

# Equity Action Plan Digest: Environmental Protection Agency

Summarized by Madeline Baxter

This is one in a series of Urban Institute digests summarizing federal agencies', subagencies', and commissions' 2022 equity action plans, which were released in response to the Biden administration's January 2021 executive order, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. The Environmental Protection Agency's equity action plan is available at [https://www.epa.gov/system/files/documents/2022-04/epa\\_equityactionplan\\_april2022\\_508.pdf](https://www.epa.gov/system/files/documents/2022-04/epa_equityactionplan_april2022_508.pdf) (PDF).

## Overview

<b>What problem is the agency trying to solve?</b>	Promote and strengthen environmental justice and civil rights enforcement to eliminate disparities in environmental and public health conditions
<b>Priority groups</b>	LGBTQ people, people of color, people with disabilities, people with limited English proficiency, tribal and Indigenous communities
<b>Historic harm mentioned?</b>	Yes
<b>Partners in implementation</b>	Alaska Native villages and Indigenous groups, Board of Scientific Counselors, Civil Rights Compliance Office, civil rights groups, environmental justice or community groups, faith groups, Government Alliance on Race and Equity, businesses owned by LGBTQ+ people, minority-serving institutions and historically Black colleges and universities, National Environmental Justice Advisory Council, National Tribal Caucus, Office of Research and Development, regional program offices, socioeconomically disadvantaged small businesses, and tribes
<b>Equity defined as</b>	Consistent and systematic fair, just, and impartial treatment of all individuals (p. 3), consistent with Executive Order 13985; for EPA this means achieving environmental justice, which it provides a practical definition of: "everyone enjoys the same degree of protection from environmental and health hazards and equal access to the benefits of environmental resources and the decision-making process" (p. 3)

## Pillars and Principles of Equity

<b>Acknowledgement of past harm and present barriers</b>	Contributions to disproportionate impact of pollution on communities of color and underserved communities (p. 4); greater burden of environmental exposures, environmentally linked disease, and adverse impacts on health and well-being experienced by people of color and underserved communities (p. 5); underrepresentation of affected communities in rulemaking (p. 8)
<b>Impact goals</b>	Provide more capacity-building grants (p. 4); account for community-level vulnerabilities (p. 6); build capacity of underserved communities to provide experience and implement community-led projects (p. 8); fund community science grants (p. 18); make procurement and contracting more equitable (p. 19)

<b>Actions and activities</b>	Develop comprehensive framework for considering cumulative impacts in relevant EPA decisions (p. 4); integrate equity, environmental justice, and civil rights benchmarks into annual performance plans (pp. 4–20); develop internal capacity to engage underserved communities, increase internal capacity (p. 11); strengthen civil rights compliance program (p. 14); publicly released EPA strategy and vision, data management plan, internal policy guidelines (p. 18); track new entrants, socioeconomic small businesses, and minority-serving institutions in procurement (p. 20)
<b>Accountability measures and approaches</b>	Tracking performance in eliminating disparities in environmental and public health conditions, and training staff and partners to use these resources (p. 2); developed quantitative tracking for each goal (pp. 4–20); relaying reports regularly to external constituents (pp. 4–20); tracking percentage of EPA programs that work in and with communities with environmental justice concerns in ways that are community driven, coordinated, and collaborative and support equitable and resilient community development (p. 10); percentage of EPA infrastructure investments that benefit disadvantaged communities (p. 10); tracking percentage and/or number of EPA community grant funds that support science to address environmental justice and equity concerns, including tribal community science projects (p. 18)

**Note:** For the rubric we used to evaluate these components of the equity action plans, see the appendix to the Urban Institute's 2023 brief "Pathways to Equity at Scale: An Analysis of the 2022 Federal Equity Action Plans and Recommendations for 2023 Plans," available at [https://www.urban.org/sites/default/files/2023-03/Pathways%20to%20Equity%20at%20Scale%20Appendix\\_0.pdf](https://www.urban.org/sites/default/files/2023-03/Pathways%20to%20Equity%20at%20Scale%20Appendix_0.pdf).

## Types of Equity and Related Activities

<b>Procedural</b> (example: expanding language and translation services; simplifying the vendor application process)	Establishing capacity-building centers across the country (p. 9); providing all public meetings and materials in nontechnical and accessible form (p. 9); potential partnership with Government Alliance on Race and Equity to integrate equity assessments (p. 12); outreach and technical assistance in federal contracting process (p. 20)
<b>Distributional</b> (example: creating new procurement program)	Providing more capacity-building grants and offering grant trainings (p. 8); developing paid fellowship and internship program (p. 9); funding community science grants (p. 17); holding procurement feedback equity forums (p. 20)
<b>Structural</b> (example: policy change via proposing legislation related to an equity goal; changing organizational functions)	Developing analysis and index scores (p. 4); EPA team to monitor cumulative impacts (p. 6); developing systems to track and quantify pollution reduction (p. 7); tracking community engagement, infrastructure investments that benefit disadvantaged communities (p. 10); launching Office of Environmental Justice and External Civil Rights Compliance (p. 12); increasing outreach staff in regional office (p. 12); equity training program for all staff (p. 12); community impact and accessibility (p. 13); improving transparency in civil rights complaints process (p. 15); procurement equity dashboard (p. 20)

## Key Metrics to Measure Progress on Equity

- percentage of EPA programs working in and with communities with environmental justice concerns (p. 10)
- percentage of significant EPA actions that demonstrate response to environmental justice concerns and address disproportionate impacts (p. 12)
- output-focused goal monitoring for civil rights compliance (p. 15)
- percentage/number of community grant funds that support science to address environmental justice and equity concerns (p. 18)
- increased vendor diversification and new entrants tracked in procurement equity dashboard (p. 20)

## Looking Ahead: Key Reflections for Plan Implementation

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Where is the agency set up for success?	Performance goals integrated within strategic plan (p. 6); begins to acknowledge historical contexts for each intervention; extensive goal-tracking metrics provided in the short and long terms; committing resources toward these improvements; launch of Thriving Communities Technical Assistance Centers Program
Areas for future investment and growth	Need for increased staffing and appropriate staff capacity to support the range of stakeholder engagement; ramping up of civil rights implementation and enforcement authority; integration of community science; address procurement barriers for minority-serving institutions and small and socially disadvantaged businesses

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