

## Equity Action Plan Digest: National Council on Disability

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 National Council on Disability's equity action plan is available at [https://ncd.gov/sites/default/files/EO13985\\_NCD%20Action%20Plan.pdf](https://ncd.gov/sites/default/files/EO13985_NCD%20Action%20Plan.pdf) (PDF).

### Overview

<b>What problem is the council trying to solve?</b>	Removing barriers for people with disabilities through research and advising (p. 1)
<b>Priority groups</b>	People of color, people with disabilities
<b>Historic harm mentioned?</b>	No
<b>Partners in implementation</b>	Centers for Medicare and Medicaid Services, Congress, Department of Health and Human Services, Department of Homeland Security Office for Civil Rights and Civil Liberties, Department of Education's Office of Special Education and Rehabilitative Services, Federal Emergency Management Agency, Joint Commission, National Governor's Association, National Institute on Minority Health and Health Disparities (pp. 2-3); hospitals (p. 7)
<b>Equity defined as</b>	Not defined beyond executive order

### Pillars and Principles of Equity

<b>Acknowledgement of past harm and present barriers</b>	Adverse impacts of climate change (p. 4); ethical concerns of using metrics based on quality-adjusted life years (p. 5); overrepresentation of young people with disabilities in nursing homes (p. 7); failure of the home and community-based services system to prevent COVID-19 deaths (p. 7); difficulty in obtaining oral health care for people with intellectual and developmental disabilities on Medicaid (p. 8); long-standing exclusion under federal employment tax law of people with disabilities in congregate work settings (p. 9)
<b>Impact goals</b>	Regularly meeting with leaders and staff from within the Biden administration and Congress to determine what has been implemented (pp. 5-11)
<b>Actions and activities</b>	Develop reports (1) to identify the specific issues people with disabilities encounter due to the increased frequency of extreme weather events and economic injustice (p. 4); (2) on states' use of the Institute for Clinical and Economic Review's quality-adjusted life years-based cost-effectiveness reports or international drug prices to inform coverage of prescription drugs in their Medicaid programs (p. 5); and (3) to identify failed aspects of the home and community-based services system that contributed to unnecessary deaths of disabled people from COVID-19 (p. 7); disseminate questionnaire to oral health care providers to determine lack of participation in Medicaid programs and waivers for patients with intellectual and developmental disabilities (p. 9); study the legal implications of the Department of the Treasury's 1965 analysis of the employment status of people with disabilities in congregate work settings (p. 10)

<b>Accountability measures and approaches</b>	Deliverable schedules for each report, tethered to strategic plan (pp. 5–11)
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**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)	No examples identified
<b>Distributional</b> (example: creating new procurement program)	No examples identified
<b>Structural</b> (example: policy change via proposing legislation related to an equity goal; changing organizational functions)	Called for specific provisions within COVID relief packages (p. 2); five reports aimed at delivering presentations to policymakers and members of Congress with the long-term goal of enacting policy changes (pp. 4–11)

## Key Metrics to Measure Progress on Equity

- developing data to identify issues people with disabilities encounter due to the impact of the increased frequency of extreme weather events and economic injustice (p. 4)
- data on the Institute for Clinical and Economic Review's quality-adjusted life years coverage of prescription drugs in Medicaid programs (p. 6)
- data on home and community-based services' contribution to unnecessary COVID-19 deaths of people with disabilities (p. 7)
- data on oral health care providers' unwillingness to provide care through Medicaid programs and waivers (p. 9)
- data on historical actions that have legal implications for current worker classifications of people with disabilities (p. 10)

## Looking Ahead: Key Reflections for Plan Implementation

Where is the council set up for success?	Action items are closely tied to addressing past harms and focus of strategic plan; progress toward all five equity actions is reported on quarterly at public board meetings; competitively sourced agreements publicly posted on website; all reports released publicly and posted online (p. 5)
Areas for future investment and growth	Identify and explore intersectionality between race and disability; plan would benefit from further defining how research projects will develop results (e.g., what data collection will occur, how that analysis will advance understanding); plan would benefit from exploring possible procedural and programmatic interventions; quantify goals and develop associated metrics where possible