Equity Action Plan Digest:
US Commission on Civil Rights

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 Commission on Civil Rights' equity action plan is available at https://www.usccr.gov/files/2022-04/usccr-eo13985-action-plan.pdf (PDF).

Overview

What *problem* is the commission trying to solve?	Internal processes that make it harder to submit, track, and resolve claims; language barriers to accessing public advisory committee meetings
Priority groups	People of color and other underserved groups (p. 2); people with limited English proficiency and/or disabilities (p. 4)
Historic harm mentioned?	No
Partners in implementation	Minority business enterprises (p. 6), National Language Service Corps (p. 4)
Equity defined as	Not defined beyond executive order

Pillars and Principles of Equity

Acknowledgement of past harm and present barriers	Lacks centralized electronic collection tool for complaints (p. 3); language barriers across advisory committees (p. 4)
Impact goals	Track self-referred complaints (p. 2)
Actions and activities	Review internal processes and policies to identify areas for improvement, revise policies and processes where applicable, identify nonmonetary improvements, implement nonmonetary improvements, identify human capital needs and source technological tools to improve processes and programs, and request additional resources to meet identified staffing and technology needs (p. 2); minimize language barriers (p. 4)
Accountability measures and approaches	Quarterly goal monitoring (p. 3)

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.

Types of Equity and Related Activities

Procedural (example: expanding language and translation services; simplifying the vendor application process)	Updated technology for submitting claims (p. 2); access to tracking self-referred complaints (p. 3); expanded language services at public advisory committee meetings (p. 4); commission reviewing advisory committee appointment policy and determining whether it effectively creates balance and includes a diversity of viewpoints (p. 5); identifying factors that historically limited minority business enterprises' access to USCCR contracts (p. 6)
Distributional (example: creating new procurement program)	N/A
Structural (example: policy change via proposing legislation related to an equity goal; changing organizational functions)	New US territory advisory committees, efforts to recruit a broader range of advisory committee members (p. 2); information technology system developed to compile e-complaints for transparency (p. 3)

Key Metrics to Measure Progress on Equity

- the number of complaints received, processed, and resolved (p. 3)
- increased advisory committee publications, membership, or public engagement in diverse languages (p. 5)
- increased advisory committee recruitment and outreach based on racial, ethnic, lingual, political, disability-status, age, and religious diversity (p. 5)
- increased contract awards to small disadvantaged businesses and minority business enterprises (p. 6)

Looking Ahead: Key Reflections for Plan Implementation

Where is the commission set up for success?	Updated technology for complaint tracking; focus on procurement; efforts to diversify and expand advisory committee can encourage more people harmed to file complaints
Areas for future investment and growth	Invest in enforcement capacity to resolve discrimination claims faster; hire more staff to review and address claims; define metrics and timelines to measure improvement for increasing engagement with underserved communities and addressing barriers beyond language access that might limit participation; define accountability measures for each intervention; coordinate with other agencies that have structures to pursue discrimination complaints to share lessons on what process and structure works for those harmed