

LPPS 5360: Imagining Equitable Policy  
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## **Understanding the Meaning of Equity Through Three Federal Agencies**

### **Introduction**

Executive Order 13985, or *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, was passed by President Joe Biden on his first day in office. Outlined in the second section of Executive Order 13985 is a definition of equity: “consistent and systematic fair treatment of all individuals.” While the Executive Order defines equity, agencies are granted the autonomy to achieve equity via their own methods. As a result, this executive order has created vastly different approaches across agencies. EO 13985 also outlines populations termed “underserved” which could be interpreted differently across agencies.

Since the definitions of equity and underserved communities can be interpreted differently, the Department of Agriculture, the Department of Social Security Administration, and the Department of Health and Human Services have taken separate routes to address inequities within their systems. Their attempts varied drastically in how they addressed community needs, involved stakeholders, and most notably, how each agency saw its responsibility in undoing the inequities they had a role in creating.

### **What does Equity Mean?**

#### *Dept of Agriculture*

When examining what equity means for the Department of Agriculture (USDA), several trends emerge. Of the seven equity action items outlined in the USDA’s Equity Action Plan, six target an external primary beneficiary, which include underserved rural communities, urban farmers, women and children living in poverty, and small business owners. These domains of these beneficiaries most frequently were designated as geography, occupation, or identity (particularly race and class). The seventh action item was primarily internal in nature, although minority farmers may benefit from the outcomes of this action item. Four of the action items were identified as addressing individual benefits; and only three were identified as addressing community benefits. One action item, “partner with trusted technical partners,” was identified as addressing both individual and community benefits.

Many of the action items were program implementation-and-access oriented, including actions such as increasing the availability of technical assistance, the inclusion of plain-language summaries for funding opportunities; and increasing staffing to assist with procuring grants in traditionally underserved communities, including tribal nations. The changes to programming primarily advanced procedural equity (six out of the seven action items); some action items also advanced distributional equity, primarily through increasing funding directed towards the target beneficiary (four out of seven action items); four action items also advanced recognition equity by acknowledging how negative perceptions of the USDA may manifest as a reticence to engage

in programs, language barriers, and the low-capacity of some rural and poor communities to become competitive for grant funding. Two of the seven action items advanced recognition, procedural, and distributional equity: “Reducing barriers to USDA programs and improving support to underserved farmers, ranchers, and landowners” and “Increase USDA infrastructure investments that benefit underserved communities.”

*Department of Social Security Administration*

After examining the Equity Plan released by the Social Security Administration (SSA), one would be left with a few key takeaways. Social Security is the nation's largest federal program, and the wide range of beneficiaries from their equity plan makes that clear. The most common domains beneficiaries were categorized as were identity, class, and occupation. A few examples of their wide range of beneficiaries include people with disabilities, transgender and non-binary individuals, BIPOC populations, low-wage workers, and the SSA itself. Many of the action items outlined by the SSA focused on evaluating their current processes, identifying areas that could be streamlined or otherwise improved to increase take-up, and ideally creating policy revisions to encourage equitable practices in the future. The foundation on which many action items are placed is often recognition of a right. In a clear example, the SSA highlights that the right to representation for disability claims is often underutilized by people with disabilities, pushing them to take action to increase the uptake of representation through awareness and the creation of new “outreach strategies.” However, not all recognition is equal in the action plan. All five action items hypothetically enhance knowledge about the barriers disenfranchised populations face. However, none of the action items laid out any concrete plans to change how resources are allocated as of now, but it appears to be something that the SSA will pursue in the future.

The framing of action items is particularly of note, as some are historically contextualized, though often only in terms of the recent past. This could be due to time or word limitations, but they opted to avoid explaining the policy history that created a need for an equity-focused action plan. The SSA tends to champion individual benefits as a key reason to continue moving forward with an action item, while communal benefits are underutilized as a selling point. The SSA’s approach to equity appears incongruent but possesses potential for the future. Many of their weaknesses revolve around how actionable their items are, whether there will be a substantive rather than superficial change in the accessibility of benefits for vulnerable populations, and their individualistic and non-contextualized framing of benefits.

*Department of Health and Human Services*

In their Equity Action plan, the Department of Health and Human Services (HHS) adopts the definition of equity: “the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.” This plan operationalizes this “treatment of all individuals” through a strong emphasis on the domains of knowledge, economic, and cultural equity. HHS has operationalized these domains through a variety of mechanisms including direct provision of resources, increasing accessibility, training personnel, and continuing to research and understand disparities. Named beneficiaries include non-English speakers, small, disadvantaged businesses, tribal and underserved communities, pregnant women on Medicaid, and their own internal department. These benefits will be granted through mainly distributional and procedural avenues,

with minimal recognitional equity. HHS has committed to a more equitable distribution of resources through funding, knowledge of opportunities, training for potential beneficiaries, and expanded Medicaid coverage.

In addition, HHS plans to implement processes to learn from their own and other departments' data, decreasing barriers to access and information. While these processes alter how decisions are made, they are not influenced by underrepresented voices nor do they provide pathways for these communities to influence future decisions. HHS acknowledges that there are disparities in language provision, grant and acquisition recipients, and maternal mortality. The department, however, fails to acknowledge that these groups have been systematically denied access to resources or affirm their claim in the future to equitable allocation of specified resources in the future.

### **Differences and Similarities**

In Equity Action Plans presented in this report, HHS referenced a definition of equity and the term underserved, the SSA references the definition of underserved, but not a definition of equity, and USDA references the executive order that defines these words but does not include the definitions directly in their writing. This lack of clarity points to an important issue of accountability: without clearly defining the issue, it is impossible to say when you have made progress in addressing equity as a whole, and for which populations within “underserved communities” interventions will directly address. HHS and the SSA both state a need for further research and understanding of the data surrounding inequity in their departments. This places this plan as the beginning of a larger journey to achieve increased equity.

Of the three plans analyzed, HHS had the shortest action plan. The items in this plan provided more procedural and distributional change with little recognition when compared to the SSA, which had no distributional items and few procedural items, and a larger proportion of recognitional items. USDA had the highest proportion of all three components. Within the procedural items in USDA and HHS, there is an emphasis on reducing burdens to marginalized groups, but less emphasis on altering the systems to significantly include those voices. Throughout the three plans, there were consistently low rates of historical context, high rates of emphasis on individual emphasis, and mixed levels of community benefits. Taken together, the low rates of historical context and the high levels of individual benefit align with overarching American practices and values of individualism and self-reliance. This is problematic because these practices and values contributed to harm that created inequity in the first place, by undergirding the idea of equity as one that allows all groups to achieve a similar status and perspective that white, straight, wealthy, able-bodied men currently have within our society. This foundational idea of increasing marginalized groups' access in comparison to the most privileged will never bring true equity and justice.

### **Understanding the Larger Implications, Concluding Thoughts**

This report provides an overview of the 2022 Equity Plans of three Executive Branch Departments. These plans vary widely in the interpretation of equity and what actions will be required to meet the advance equity in each of their sectors. Nevertheless, the agencies examined here do provide insights into the process of advancing equity in a policy space through two broader conclusions: the benefit of examining a small component and a well-defined beneficiary

population, and the challenges for the public sector as an agent for enacting more transformative change.

Both the USDA and HHS have a well-defined beneficiary population, which means that the action items within these plans could target very specific populations, such as minority farmers living in rural areas. This allows for programmatic changes that may have the potential to provide more equitable access to resources, which may be challenging for other departments with broader scopes and with more all-encompassing goals, including agencies such as the SSA. Expanding this takeaway to policy-making at-large, it could be argued that this speaks to a benefit of addressing equity in small portions with explicit beneficiary groups.

Despite the potential benefits of changing the accessibility of resource-oriented programs in the USDA and HHS, the Equity Plans analyzed here also fail to vision towards more transformational change with regard to program structure and implementation. As one example, the SSA makes no mention in its equity plan of the more systemic inequalities of the labor market and educational system that produce differing outcomes in peak salaries, which directly impacts the amount of social security benefits one receives during retirement. A more transformational approach to equity could be to reconfigure the system of how social security benefits are distributed; instead, the SSA remains well within more conservative boundaries by including action items such as increasing the accessibility of customer service representatives.

In conclusion, the Equity Plans presented here provide some insight into both the challenges and potential opportunities for present and future policymakers interested in enacting equitable policies. Policymakers should take careful consideration to truly understand where inequities lie within their current programmatic efforts, including acknowledging that some failures may not be recognized by those within the organization. Policymakers should also continue to explore the extent to which transformational change is possible, as it may be necessary to truly achieve equity.