



A FRAMEWORK FOR ASSESSING EQUITY IN FEDERAL PROGRAMS AND POLICIES

Advancing Racial Equity and Support for Underserved
Communities Through the Federal Government (EO 13985)

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Part 1: Background and Framework Purpose

On January 20th, 2021, President Biden issued Executive Order (EO) 13985 requiring agencies to recognize and work to redress inequities in their policies and programs that serve as barriers to equal opportunity. It directs that agencies advance equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality. The EO further directs that each agency assess whether its programs and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups and produce plans for addressing any identified barriers to full and equal participation in programs and in agency procurement and contracting opportunities.

Guidance pertaining to the program and policy equity assessments is primarily found in four sections of the EO: Section 1 sets the policy for the order; Section 5 describes expectations for conducting equity assessments; Section 7 sets a target for articulating remediation plans; and Section 8 establishes a requirement to consult stakeholders from underserved communities. The EO identifies the following milestones for federal agencies:

1. By August 7, 2021: Conduct Assessment and present findings to the Assistant to the President for Domestic Policy.
2. By January 21, 2022: Produce a plan to address any identified barriers and define support needs.

In support of this effort, The MITRE Corporation, a not-for-profit company working in the public interest, is offering a framework for program and policy equity assessment for consideration, use, and enhancement by federal agencies. This framework integrates leading thinking on equity

assessment, compiled from local practitioners, global thought leaders, and MITRE subject matter experts, tailored for actionable use by federal audiences. The framework leverages MITRE's extensive experience working across government through operation of federally funded research and development centers (FFRDCs) and MITRE's systems engineering background. It is a systems-based data-driven approach to assess government policies and programs that incorporates equity and human-centered research, design, and assessment practices currently used in the United States and around the world. It is designed to support the near-term directives established by EO 13985 and offer insights that can inform long-term incorporation of equity assessment concepts and processes into larger program management and policy-making efforts. Part 2 of this document provides an overview of the proposed equity assessment framework. Part 3 provides a step-by-step approach to implementing the framework.

Federal programs cover a wide range of services and benefits, from those specifically aimed at supporting underserved communities to those that support the broader operation of government. These programs utilize a variety of operating models, including delivering benefits through partnerships with state, local, tribal, and other intermediary organizations. Regardless of their approach, government programs produce intended and unintended impacts on numerous communities, many of which may have unique needs. The framework aims to help agencies better understand those impacts, needs, and requirements in order to support the federal government's goal, as articulated in EO 13985, of providing everyone with the opportunity to reach their full potential.

While the framework is broadly applicable to all federal programs, agencies will likely need to tailor each step to fit the unique qualities and circumstances of policies and programs under

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review, as well as resources and tools available to the reviewers. We recognize that federal agencies are simultaneously working to execute the time-sensitive directives established under EO 13985 while developing the capabilities and relationships required for more comprehensive and ongoing equity assessments, and therefore may not be able to fully execute all elements of the framework. For example, a central tenet of equity is close and ongoing collaboration with those being served, particularly with citizen experts who have the lived experience of an inequity. The incorporation of this kind of expertise via collaboration throughout a policy or program's lifecycle (including research, design, execution, monitoring, assessment, analysis, and remediation) is critical in understanding the problem and creating effective and equitable

solutions. However, due to the time constraints imposed by the EO, agencies may not be in a position to fully engage citizen experts in all parts of the assessment. Each step in the framework, even when not fully executed, provides insights about equity and agency processes. These insights should be reflected in the final assessment and considered during resolution planning and development of future assessment processes. MITRE recommends executing all steps of the framework and provides recommendations throughout the document for how to tailor the framework to meet resource limitations.

Equity assessment is a continuous effort, as illustrated in Figure 1 below. While many programs were prompted by EO 13985 to begin equity assessment, achieving the policy goals articulated in

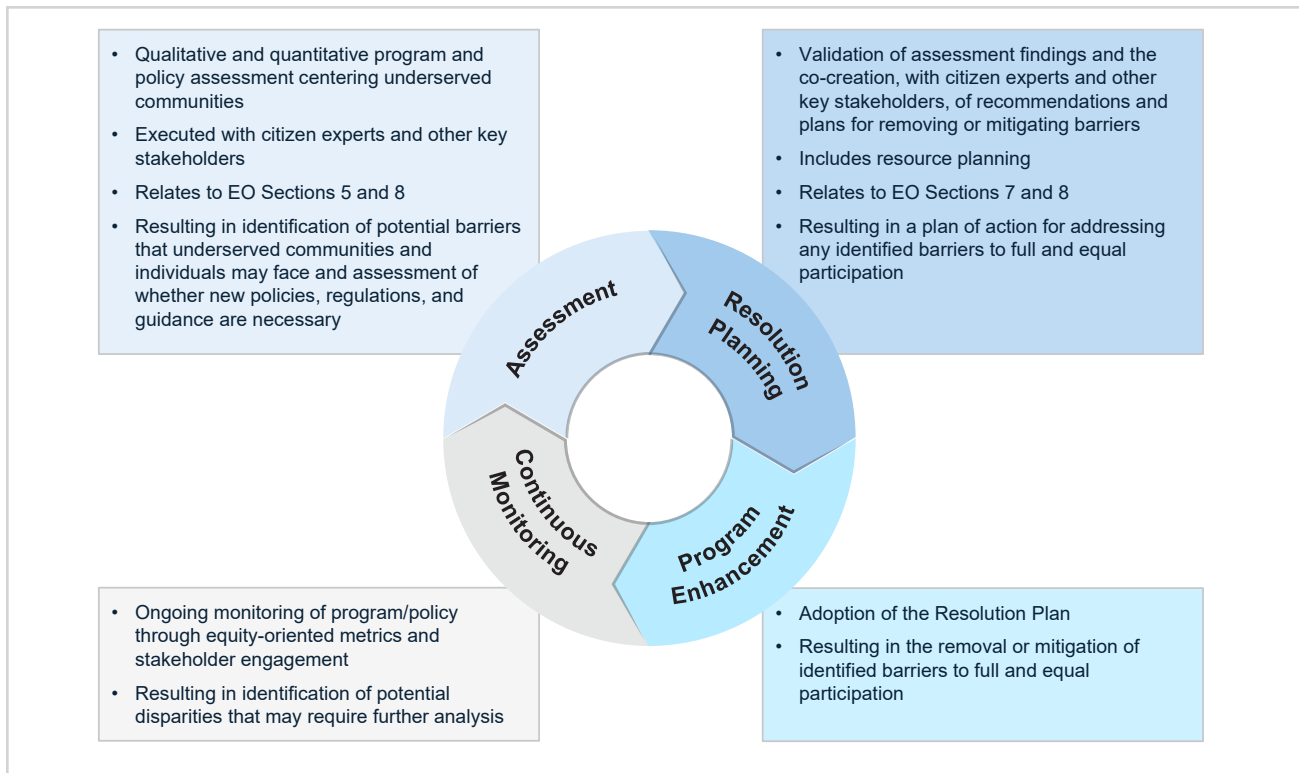


FIGURE 1: ADVANCING EQUITY IN FEDERAL POLICY AND PROGRAMS IS A CONTINUOUS EFFORT

Note: This document offers a framework for execution of the "Assessment" step of the lifecycle depicted above.

the EO will require agencies to expand the number of programs being assessed for potential barriers, adopt continual equity assessment processes, and incorporate them into existing program management and policy-making operations. The framework for equity assessment can inform not only assessments undertaken in response to EO 13985, but also the development of future agency assessment processes. Equity assessment can, for example, be introduced into overall program assessments that traditionally evaluate performance, cost, and effectiveness. The inclusion of equity considerations expands upon these measures through framework elements that help teams closely examine the needs of those who are vulnerable, historically underrepresented, and underserved; collaboratively assess the impacts of policy on their outcomes; and co-create equitable solutions with them.

Part 2: Overview of the Framework

The framework provides a general structure and detailed guidance for repeatable and inclusive equity assessments that use both qualitative and quantitative methods to identify and explore inequity in policies and programs. The framework is anchored by an understanding of the program's or policy's intended outcomes and fosters examination of all aspects of the program from the perspective of underserved communities to explore potential barriers to equal opportunity. It is targeted at the execution of the Assessment quadrant of the continuous cycle shown in Figure 1, and provides actionable next steps to help agencies prepare for the Resolution Planning phase that follows Assessment. It is important to note that during the Resolution Planning step, it may be necessary to

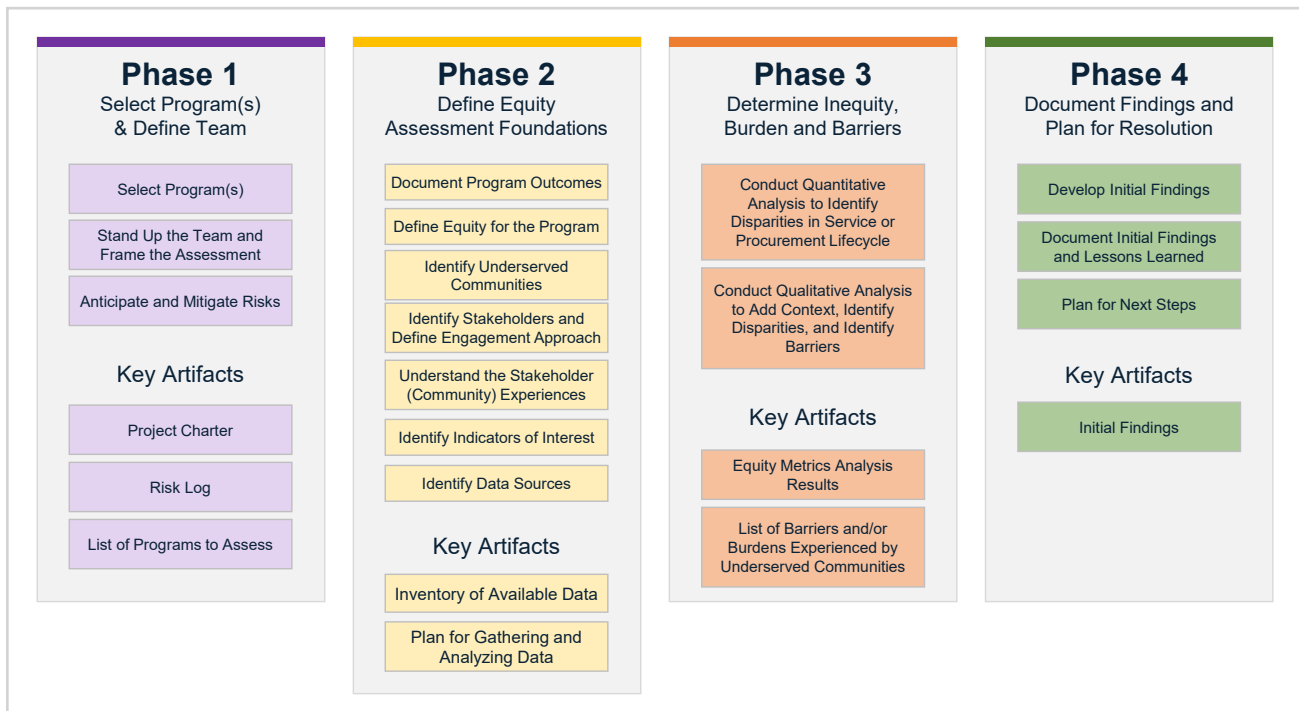


FIGURE 2: PHASES OF THE FRAMEWORK

refine insights learned in the Assessment phase. This is to be expected as equity assessment teams gain additional insights, engage key stakeholders and collect better data and information. Expect and prepare for continuous refinement as new qualitative and quantitative data yields new insights. This is not a signal of failure but an integral part of the ongoing equity assessment process.

The framework consists of four core phases, each producing artifacts that build on one another to result in assessment findings:

For each step identified in the four phases, the framework details:

- **Methodology and Outputs**
 - “Methodology” describes the recommended steps and activities to conduct the assessment.
 - “Outputs” describes the artifacts and results from the step in the process.
- **Key Considerations, Tools, and Resources**
 - “Key Considerations” outline best practices and provocative questions to consider when executing each step in the process.
 - “Tools” can be used by the government to support the process steps.
 - “Resources” provide additional reference materials that support execution of the methodology.

This customizable approach recognizes that federal agencies have limited time and resources to support the initial equity assessment required by the EO and offers guidance in the Methodology and Key Considerations sections for tailoring each step in the process. In addition, this framework draws on leading practices in equity and program evaluation. References to these concepts and tools can be found in the Tools and Additional Resources sections. Some of the referenced tools

are MITRE-developed, while others are practices employed by others and made available in the public domain. For MITRE tools not publicly available via the internet, please contact MITRE at socialjustice@mitre.org.

Key Terms and Definitions

The framework incorporates proven practices from a variety of local, state, and global practitioners, subject matter experts, and thought leaders. To facilitate adoption of these concepts at the federal level, we are standardizing the use of several important terms used throughout this framework. We introduce them here as an aid in understanding the overall framework and the sometimes subtle, but important nuances between these terms.

- **Access:** The right or opportunity to obtain benefits and privileges afforded by government services and programs.
- **Citizen Experts:** Stakeholders with lived experience of the inequity/problem in question. Using this distinction recognizes that individuals’ lived experience can provide critical insights to help better understand a problem, validate a problem, and/or shape an opportunity. This also helps to move the individuals with relevant lived experiences from passive roles to more active roles during solution identification and creation. Citizen experts also can be referred to as community partners.
- **Community:** A group of people or body of nations that have a common history or common social economic, geographic, and/or shared demographic profile.
- **Inequity:** A lack of fairness or justice. Can be revealed by disparate and/or disproportionate outcomes experienced by different groups.
- **Lived Experience:** Personal knowledge or firsthand experience of an inequity.

- **Priority Population:** An impacted community that experiences one or more forms of inequity. These stakeholders experience barriers and burdens due to inequity, and they will be impacted by the equity assessment.
- **Stakeholders:** Individuals, organizations, or groups who are involved with, can influence, or will be impacted by the service, policy, and/or program.
- **Target Population:** The intended recipients and/or beneficiaries of the policy or program.
- **Underserved Communities:** Refers to populations sharing a particular characteristic, as well as geographic communities, that have

been systematically denied a full opportunity to participate in aspects of economic, social, and civic life, as exemplified by the list in the preceding definition of “equity.” Examples of underserved communities: Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality.

Part 3: Step-by-Step Implementation of the Framework

Detailed Description	
<h3>Phase 1 – Select Program(s) and Define Team</h3>	
<p><i>Methodology and Outputs</i> <i>Key Considerations, Tools, and Resources:</i></p>	
<h4>Step 1 - Select Program(s)</h4>	<h4>Key Considerations, Tools, and Resources:</h4>
<p>METHODOLOGY</p> <ul style="list-style-type: none"> ▪ Identify criteria for program selection. To select the initial program as well as to prioritize subsequent programs for assessment, agencies should develop a criteria-based approach. Some examples of criteria may include: <ul style="list-style-type: none"> – Size of population served – Degree of program impact, or urgency (i.e., programs that serve our most vulnerable populations) – Program funding – Programs that have exhibited symptoms of inequity – Programs with audit findings related to underserved communities – Programs with known risks/barriers to enrollment or access ▪ Consider the U.S. population at large and answer these questions. Focus on where within the agency’s portfolio inequity may be prevalent and which programs will most benefit from an equity assessment. <ul style="list-style-type: none"> – Who is marginalized? – Who is exploited? – Who is powerless/voiceless? – Who has been “othered” as not being part of the dominant class? – Who has been subject to acts of violence (physical, psychological, etc.) because of their identity? ▪ Collect information across programs based on criteria. Collect, or calculate the measures associated with, the identified criteria in a spreadsheet or other decision support tool for the selection committee or individual. ▪ Evaluate and select program(s). Prioritize programs based on the criteria. The selection may be made based on qualitative criteria, or a more quantitative weighting and scoring approach. <p>OUTPUTS</p> <ul style="list-style-type: none"> ▪ Identified program(s) for assessment with supporting rationale 	<p>KEY CONSIDERATIONS</p> <ul style="list-style-type: none"> ▪ To what extent are there known challenges in access to certain programs’ benefits or impacts? <p>TOOLS AND RESOURCES</p> <ul style="list-style-type: none"> ▪ Leverage agency internal tools for portfolio management, Capital Planning and Investment Control (CPIC), or strategic information technology governance to capture and prioritize the program information. ▪ Portfolio Management Guide (MITRE) https://www.mitre.org/publications/systems-engineering-guide/enterprise-engineering/enterprise-planning-and-management/portfolio-management ▪ Five Faces of Oppression: Justice and the Politics of Difference by Iris Marion Young. Sept 2011. Princeton University Press.

Step 2 – Stand Up the Team and Frame the Assessment

METHODOLOGY

- **Identify a multidisciplinary, inclusive, and diverse team from across the agency.** A multidisciplinary team, representing, for example, various divisions, roles, skills, and levels of experience, will provide the perspective needed to assess program delivery and equity.
 - The team should adhere to and demonstrate the values of diversity, inclusion, and equity. It should work to raise awareness of and mitigate personal biases that may influence the assessment.
 - Relevant expertise to conduct assessments may include individuals with experience in equity and/or civil rights, program evaluation, data analytics, systems thinking, stakeholder engagement, organizational effectiveness/change management, and relevant legal/regulatory/policy backgrounds.
 - Team members also should include citizen experts and relevant stakeholders where possible. Engaging stakeholders early in the assessment can enable insights and information that can prove valuable in the assessment process through resolution and implementation.
- Document the team's mandate. Set forth purpose of the team and identify its functions and activities, based on selected programs. Communicate this to the agency and key stakeholders to ensure that the team has appropriate access to information needed to conduct equity assessments.
- Define the findings review process. Define the internal review process that will be used to evaluate the findings and recommendations and define the review and approval process that will be used to publish the findings from the assessment.

OUTPUTS

- Project charter, terms of reference, or other mandate document
- Team guidance (timeline, milestones, etc.)

KEY CONSIDERATIONS

Is the mandate for this team's work limited to this one-time equity assessment, or will there be ongoing activities post-assessment (e.g., assessing additional programs, implementing planning, etc.)?

Agencies may consider specific subject matter expertise in assembling the equity assessment team(s) based on the program's domain and desired outcomes.

What internal and external stakeholders should be included in the process?

Does the team have knowledge of equity, justice, implicit bias, and systemic bias and/or systemic racism principles and concepts? Do team members create a culture of humility and inclusion that will be welcoming to citizen experts and other forms of grassroots expertise? Has the team explored (and is the team willing to continue to explore) personal assumptions and biases that they might be bringing to this assessment?

Will this assessment be shared publicly or with key partners? Is equity assessment a part of a larger set of organizational initiatives or policies? What level of validation is required, and who must be involved early to ensure success?

If the agency is conducting multiple assessments, continuity and efficiency may be improved by establishing a core set of team members who oversee or execute all program assessments. Additional team members can be added for their expertise of identified programs.

TOOLS AND RESOURCES

- Coalition of Communities of Color, Organizational Self-Assessment Related to Racial Equity <https://www.coalitioncommunitiescolor.org/research-and-publications/ccorgassessment>
- IPT Startup Guide (MITRE) https://www.mitre.org/sites/default/files/pdf/08_1645.pdf
- Stakeholder Identification Canvas (MITRE) - <https://itk.mitre.org/stakeholder-identification/>
- Federal Employee Viewpoint Survey (FEVS) data
- MITRE FEVS Inclusivity Index Tool (contact MITRE)
- Project Premortem Template (MITRE) - Frame and explore your problem by imagining a future scenario in which the proposed activity fails to achieve its objective, describing the failure, then identifying the causes of the failure. Give your team insight into priorities and success criteria, uncover hidden assumptions, and identify potential pitfalls. <https://itk.mitre.org/premortem>

Step 3 - Anticipate and Mitigate Risks

METHODOLOGY

- **Identify initial risks that could impede an effective and timely assessment.** Given the short timeframe for assessments in support of the EO, the team may not be able to engage stakeholders, collect relevant data, and validate, and verify findings. As a result, the assessment could be facing significant risks to success. These risks should be identified early and documented.
- **Develop and implement mitigation.** As the risks are identified, mitigations should be identified and be implemented immediately, where possible. Mitigation could materially impact how the assessment is carried out and impact the team's plans and schedules.
- **Document and share the risk log.** Keep a running list of risks and mitigations and share status and mitigations with assessment stakeholders. The risks identified can be used to define the assumptions and constraints that affect the equity assessment's final findings and recommendations.
- **Continue to identify, evaluate, and document risks through the course of the equity assessment.** As the assessment is conducted, new risks that affect how findings may need to be interpreted could arise. Keep the risk log updated throughout the process.

OUTPUTS

- Risk log, to be maintained throughout the assessment, with initial risks and mitigations identified and communicated to stakeholders.

KEY CONSIDERATIONS

Do we have access to stakeholders? If not, how might we effectively engage stakeholders? How does lack of access to stakeholders impact outcomes?

What costs, risks, and opportunities are relevant to the communities being studied? The relationship between the federal government and some groups has been fractured due to prior assessments. What history is relevant and what mitigations might we consider?

How does the limited timeframe provided to conduct equity assessments affect the methodology? Capture the risks associated with an abbreviated assessment and any potential mitigation steps.

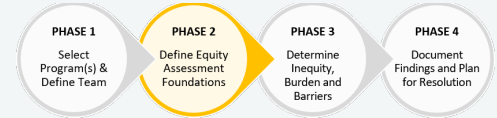
What are the assumptions and constraints that will influence the conclusions that the assessments may set forth?

If risks cannot be mitigated, consider how the final equity assessment can acknowledge the limitations of the assessment. For example, note in the assessment that not all stakeholders' interests may be represented based on recent information collection

TOOLS AND RESOURCES

- Risk Matrix Template (MITRE) <http://www2.mitre.org/work/sepo/toolkits/risk/ToolsTechniques/RiskMatrix.html>
- Risk Management Best Practices (MITRE) <https://www.mitre.org/publications/systems-engineering-guide/acquisition-systems-engineering/risk-management>

Detailed Description



Phase 2 – Define Equity Assessment Foundations

Methodology and Outputs

Key Considerations, Tools, and Resources:

Step 1 - Select Program(s)

METHODOLOGY

- **Develop a program profile.** For each selected program, provide a summary of the outcomes to be achieved by the program and key strategies used to achieve those outcomes. The analysis typically includes:
 - The overall life outcomes that the program intends to affect for program beneficiaries
 - The intended short-, mid-, and long-term outcomes (key performance indicators) of the program, such as increasing financial literacy and financial independence.
 - The strategies being employed, such as supplementing income and conducting individualized counseling
 - Key interim and outcome metrics, such as program registration and completion rates or household income or net wealth, as well as associated data
 - Assumptions, such as that increased knowledge will change practice
 - External factors out of scope of the program, such as ability of target audience to access training sites or availability of funding
 - Target population
- **Where available, summarize evidence and data as to whether the program has been successful in achieving its intended outcomes,** including any data about interim and outcome metrics for the overall target population and any known challenges or limiters to overall program success.

OUTPUTS

- Summary of program/policy outcomes, strategies for change, and target population
- Summary of program effectiveness and known challenges

KEY CONSIDERATIONS

For many programs, this program profile is well-documented and all team members agree to the articulation. For others, the process of documenting outcomes and supporting strategies being employed to achieve those outcomes may initially reveal different visions of success among the program team. Articulating and resolving these differences is an important part of the equity assessment process.

It is critical that the assessment team bind their assessment by understanding what impact the program aims to achieve, for whom, and how the program intends to achieve that impact. This is particularly important in answering whether new policies, regulations, or guidance documents may be necessary to advance equity in agency actions or programs.

TOOLS AND RESOURCES

- Mission, Vision Canvas (MITRE)
Use to develop clear statements about your organization's future aspirations and present activities: <https://itk.mitre.org/mission-vision-canvas>
- 4-H Program Leaders Working Group Logic Model Resources, <https://access-equity-belonging.extension.org/resources/logic-models-access-equity-and-belonging/>
- Theory of Change, The Annie E. Casey Foundation <https://www.aecf.org/resources/theory-of-change/>

Step 2 - Define Equity for the Program

METHODOLOGY

- **Consider the program outcomes documented in Step 1 and define how the concept of equity applies to those outcomes and metrics.** In many cases, programs define equity as achieving representational parity with the breakdown of the general population. In other cases, programs define equity based on the overall life outcomes they are targeting. For example, a program distributing COVID-19 antibodies might define equity based on the disparate health and economic impacts COVID has had on Black, Indigenous, and people of color populations, as opposed to defining equity in terms of ensuring that distribution of antibodies is consistent with the racial breakdown of the general population.
- Also, equity can be considered through multiple lenses, including:
 - Awareness Equity: How equal and practical is the ability to become aware of the service?
 - Procedural Equity and Fairness: Do we see inequity in the application of eligibility requirements? Is there evidence of unequal protection and/or failure of due process?
 - Access and Distributional Equity: Are there differences in levels of access to benefits and services across groups?
 - Output Equity: Are there differences in the completion rate of an activity?
 - Outcome Equity: Is the impact of programs or policies the same across all groups?
 - Quality and Process Equity: Is the quality of services delivered consistent across all groups in the population?
 - Citizen Engagement Equity: Are all groups served engaged equally and proportionately represented in data collection and other feedback loops?

OUTPUTS

- Proposed definition of “equity” as it pertains to the program/ policy

KEY CONSIDERATIONS

This step is key to defining success for the program from an equity perspective.

Considerations around “reasonability” should be included when discussing awareness and access to benefits. While it may be technically correct to say that there is equal ability, if it is not practical or reasonable to assume that all parties, regardless of circumstance, can be aware of or access benefits without undue difficulty, then it is not equitable.

What does equity look like across different communities’ populations (e.g., is there a merit element to the program, is the goal an equality of condition, etc.)?

TOOLS AND RESOURCES

- Problem Framing Canvas (MITRE) - <https://itk.mitre.org/problem-framing/>
- Stakeholder Identification Canvas (MITRE) - <https://itk.mitre.org/stakeholder-identification/>
- Urban Institute. Metropolitan Housing and Communities Policy Center. 2019. State of Equity Measurement, <https://tinyurl.com/4vjfduwt>
- Bread for the World Institute, Racial Equity Scorecard, <https://tinyurl.com/3pzfnbyn>

Step 3 - Identify Underserved Communities

METHODOLOGY

- **Identify initial hypotheses about who is underserved.** With this understanding of equity in mind, conduct an Environmental Scan. Review existing research, program data, prior program assessments, external published reports or materials relevant to the program’s administration, delivery, and/or outcomes to form initial hypotheses about whether, and if so, which communities may be underserved. Note that this initial hypothesis must be further evaluated through data analysis and stakeholder engagement.

Multiple communities may be identified. Considering the definitions of “equity” and “underserved” provided in the EO and depending on the unique circumstances of the policy or program, the term “underserved” may apply based on geography, race, ethnicity, language, income, gender identity, sexual orientation, religion, differing abilities, immigration status, or some combination of these and other factors.

OUTPUTS

- Initial hypotheses about which populations are underserved

KEY CONSIDERATIONS

This is an important first step in the process of evaluating the program/policy from the perspective of those who may not have been “in the room” when the solution was designed (those who have been marginalized, were powerless, or were not part of dominant classes), but who are affected by it or may have unanticipated barriers or burdens in reaping the benefits of the solution.

The assessment team should identify any and all distinctions of meaning and be careful not to tokenize any one group.

This initial research need not be limited to agency data and information. Often, external research related to the outcomes of the program space will highlight disparities. Although those disparities may not be the result of the program, the research may point assessors to a potentially underserved population.

Anecdotal information from program managers, participants, and partners can also be very useful at this phase.

TOOLS AND RESOURCES

- Problem Framing Canvas (MITRE) - <https://itk.mitre.org/problem-framing/>
- Stakeholder Identification Canvas (MITRE) - <https://itk.mitre.org/stakeholder-identification/>
- Bread for the World Institute, Racial Equity Scorecard

Step 4 - Identify Stakeholders and Define the Engagement Approach

METHODOLOGY

- **Identify program stakeholders and their needs.** Identification of stakeholders includes groups (e.g., potential consumers) who may benefit or become burdened as a result of successful program administration and delivery, as well as those who partner with the agency in service delivery (e.g., state, local, or tribal organizations).
 - Who has the problem that is being solved by this policy or program?
 - What community is being served (or not)?
 - Who may have been overlooked?
 - Who else is delivering or creating approaches (e.g., potential solutions), and what can we learn from them?
 - Who needs to be involved from the community to help inform or develop the approach?
 - Who needs to be involved (especially from the community) in decision-making processes?
 - Who is essential to successful service delivery? Who could derail program success?

KEY CONSIDERATIONS

Ideally, the equity assessment is conducted in partnership with community stakeholders. Community stakeholders include citizen experts, as well as communities that will be impacted by potential solution(s). Engaging with community stakeholders ensures that underserved communities are positioned to act in their own best interest.

Consider methods such as Community Based Participatory Research, Participatory Design, and/or Equity-Driven Design Thinking to include community stakeholders as part of the assessment team.

A number of challenges can arise with engaging community stakeholders. The assessment team should anticipate, and design mitigation plans, to ensure effective engagement. These challenges, if not mitigated or planned for, can constrain how and to what extent these community stakeholders can be engaged in the process. For example, stakeholder engagement may be subject to Paperwork Reduction Act (PRA) requirements; community stakeholders may not have a unified voice, so proxies may better serve the purpose; etc.

Step 4 - Identify Stakeholders and Define the Engagement Approach

- **Assess ongoing and past stakeholder engagement.** Many programs have built-in processes to engage stakeholders in the operation of the program, such as feedback surveys, periodic assessments, or anonymous channels, etc. Assess the role that each stakeholder group has played in the program (e.g., provided feedback on the program, participated in the design of the program, etc.), and assess if the feedback and participation is sufficient to support this assessment.

- **Create an engagement plan for each group of stakeholders during the assessment.** Engaging stakeholders is the best way to gain insights, truly understand where inequity may exist, and understand the barriers and burdens experienced. Citizen experts are those stakeholders who have lived experience of problems or issues. Engaging citizen experts as co-designers in the assessment makes it more likely that the real problems of inequity will be discovered.

The method and manner of engagement should not only be amenable for the agency, but should work for the stakeholders as well; otherwise, it will be ineffective. In addition, community stakeholders should be appropriately compensated for their time and contributions.

If there is limited time available for the assessment, comprehensive stakeholder engagement may not be possible. In this case, proxies may be available to internal subject matter experts who are familiar with the stakeholders' needs and could fulfill their role in the assessment.

Consult within your organization to determine who might add insight. In addition, coordinate with other agencies to ensure integration of outreach and engagement activities to specific and targeted communities.

OUTPUTS

- Stakeholders identified
- Stakeholder engagement plan created

When identifying community stakeholders, consider organizations and intermediaries that work with impacted groups: Whose insights are critical? Who could derail the assessment and who could ensure its success?

If it is not possible to engage directly with community stakeholders: Who are the advocates and/or other “on the ground” experts, and what is the best way to engage them? How do we ensure cultural competence? Do we have trust? If not, how might we build trust? What external information could serve as a proxy for stakeholder feedback? Conduct an environmental scan to identify proxy information that could be used in the assessment, Office of Management and Budget/Government Accountability Office (OMB/GAO) reports, Inspector General (IG) reports, advocacy group studies, academic studies, etc.

TOOLS AND RESOURCES

- Leverage partnerships and affiliations to inform outreach activities, such as through MITRE's Social Justice Platform and other partnerships with minority-serving organizations.
- About Cultural Competence from the Centers for Disease Control <https://npin.cdc.gov/pages/cultural-competence>
- Stakeholder Identification Canvas (MITRE) <https://itk.mitre.org/stakeholder-engagement/>
- US Public Participation Playbook <https://digital.gov/guides/public-participation>

Step 5 - Understand the Stakeholder Experience

METHODOLOGY

Capture stakeholder perspective.

There are multiple methods to capture the stakeholder experience. We focus here on three human-centered design techniques: PAINstorming, personas, and journey maps.

PAINstorming, personas, and journey maps can help deepen the understanding of the stakeholders who have the lived experience of the inequity. Due to time or other constraints, the assessment team may not be able to engage stakeholders directly, so this step can help characterize the stakeholders to gain insights into their experiences. It must be said, however, that the best way to understand the stakeholder experience is from the stakeholders themselves. We advocate for co-creation and co-design of this assessment process with stakeholders and/or proxies. Solutions (and the process to derive solutions) are best when affected stakeholders are engaged in the process as co-creators with the government, not only as test subjects.

When developed with cultural awareness and empathy, personas and journey maps are great tools in helping to identify barriers and other insights. They become even stronger tools when the stakeholder can co-create, validate, and revise the personas and journey maps to avoid misrepresentation and tokenization. In instances where it is not possible to engage the communities to be part of this process, engage proxies and/or staff or employees who work closely with end users to help create the personas and journey maps.

For key stakeholders identified in the initial hypotheses, assessment teams can better understand the stakeholders' experiences with their program by developing a persona. A persona is a descriptive profile that helps to understand and articulate perspectives, attributes, and needs of the stakeholder. A journey map enables understanding of the persona's perspectives and how they interact with the program. There are several methods to do this, which are listed below. These artifacts are developed through either a PAINstorming session (if time is short), or through a more thorough persona and journey map development effort.

▪ PAINstorming activity

PAINstorming is a brainstorming activity to help teams understand the experiences of those they serve. It combines insights achieved via the persona activities and journey mapping activities and can be used as an accelerated method of creating a persona and journey map. PAINstorming does not replace full persona development or journey mapping. It provides an “at a glance” view of the persona and their perspectives, needs, and wants derived via brainstorming with the team to understand how impacted communities may experience a service or program.

KEY CONSIDERATIONS

Community engagement, co-assessment, and co-creation of solutions with, and not just for, those who experience the inequity is critical. Approaches such as participatory design for public participation is a best practice and should be the goal of programs that want to eliminate inequity and create positive social change.

This information is essential to centering the needs of marginalized, vulnerable, and underserved people during the course of the equity assessment. In the absence of ongoing collaboration with citizen experts, personas and journey maps can stand in as “users.”

What are some of the unique needs or characteristics of the communities? What is common? What context and history are relevant to their relationship with the program/policy being assessed? What assumptions does the assessment team or program team have about the priority populations?

When creating personas to identify priority populations “of interest” and to help determine where inequity exists, consider intersectionality. That is, the convergence of where an individual may be part of multiple underserved groups. An example of this could be a Hispanic, Spanish-speaking woman who is LGBTQ. This is called “designing for the margins.” By identifying the most “marginalized,” you can identify inequity across multiple groups. When issues for those “at the margins” are fixed (that is, those who are the most impacted by inequity), value accrues not only to those at the margins, but to everyone. (Examples of designing for the margins: closed captions, handicapped access, curb cuts, etc.)

TOOLS AND RESOURCES

- Persona template (MITRE) <https://itk.mitre.org/personas/>
- Elements of a Persona <https://www.usability.gov/how-to-and-tools/methods/personas.html>
- PAINstorming (MITRE) <https://itk.mitre.org/painstorming/>
- Service Blueprint Canvas (MITRE) <https://itk.mitre.org/service-blueprint>
- Journey Mapping (MITRE) <https://itk.mitre.org/journey-mapping>
- U.S. Public Participation Playbook <https://digital.gov/guides/public-participation>

Step 5 - Understand the Stakeholder Experience

▪ **Persona activity**

This activity is to develop personas of those who are end users of the program or service. This technique is often used to create a visual story that enables the program to better understand the end user, demographics, needs, wants, aspirations, and other information that helps to paint a picture of who they are. Personas promote empathy by providing a way of seeing and understanding those the program is designed to support. Persona development is typically based on primary research gathered through interviews, feedback, surveys, and other means of data collection to help understand the end user. Personas can also include information on education, values and beliefs, goals, thoughts, and other information to aid in understanding the end user.

▪ **Journey Mapping activity**

A journey map can provide a “day in the life” view of an end user on their journey to realize the intended results of the program. This includes their interaction with the program itself, as well as all of their peripheral actions. This activity will also help to inform activities that fill gaps in outcomes and incorporate activities into the implementation plan. There are several type of journey maps that can be created, depending on the assessment needs and goals. Types of journey maps include:

- Service Blueprints
- “As-Is” or Current State Journey Map
- “To-Be” or Future State Journey Map
- “Day in the Life” Journey Map

At this point in the process, the assessment team may gain the most value from a service blueprint and/or an “as-is” journey map. The details on how to create both types of journey maps are provided in the appendix. A brief description of both is described below.

▪ **Service Blueprint**

A service blueprint shows both the front stage (user experience) and backstage (process to deliver the service/ program). A service blueprint can help to demonstrate what is happening “behind the scenes” to establish the experience. This tool accelerates the process of understanding the service and how it connects with people, and it provides insights into critical moments throughout the experience and possible improvement.

See Appendix A on how to create a service blueprint.

▪ MITRE F.A.I.R. Framework (contact MITRE)

The FAIR Framework integrates community voice into quantitative and qualitative research, analysis, modeling, and simulation. It is a systematic methodology to identify and explore the architecture of disparities and the design of equity. It helps clarify the structural elements that lead to a community’s experience of a certain outcome in a given space (e.g., disparities in health; persistence of poverty). This structured process supports both quantitative and qualitative research efforts.

Step 5 - Understand the Stakeholder Experience

▪ “As-Is” or Current State Journey Map

Current state journey maps illuminate pain and opportunity points from the end users’ experience and perspective. They also account for their touchpoints with the program/services, as well as their feelings, motivations, behaviors, and thoughts. Current state journey maps can also provide insight into other activities that affect the end user that are relevant to their experience with the program/service. They can also shed light on other forms of inequity that the end user may experience and how it shapes their life, choices, and activities.

See Appendix A on how to create a current state journey map.

Step 6 - Identify Indicators of Equity in the Program and Procurement Processes

METHODOLOGY

▪ Identify indicators, measures, metrics, and scales of equity.

Starting with the operational definition of “equity” in Phase 2, Step 2, identify how the program will assess equity *in*:

1. Program access to benefits and opportunities,
2. Taking advantage of procurement and contracting opportunities.

Indicators are a fact or trend that indicates the state, level, or presence of something without directly observing it (adapted from Oxford Dictionary). In this case, indicators should support the evaluation of equity towards the realized definition of equity as it relates to the program (i.e., equal access to all program outputs).

An indicator is often, but not exclusively, implemented as a metric of one or more measures. Measures are the means of assessing the degree, extent, or quality of something (e.g. demographic comparison of program output delivery is a measure of equal access.)

For each measure, metrics should subsequently be identified that provide a concrete method for assessment and relate to “how” the indicators are measured (e.g., ratio of percentage delivered to protected class A to B over one year is a metric of equal access)

The scale to evaluate each metric should be established prior to analysis to evaluate ranges of performance and how they will be evaluated against the indicator (e.g., <1:1 ratio of percentage output delivered to protected class A to B over one year indicates low assessment of equal access, etc.)

KEY CONSIDERATIONS

Due to time limitations, the assessment team may need to prioritize indicators to a small subset relating to awareness, access, procedural inclusion, output and overall impact.

Time permitting, multiple, complementary indicators are required to gain a full picture of equity. For example, graduation rates by race or income alone may not be sufficient to determine equity in education; complementary indicators such as access to special resources such as gifted and talented programs, college admission rates, and school discipline may be required to present a more complete picture.

Approaches employed for disparate impact analysis and adverse impact analysis (as required by Title VII and other civil rights laws) can be leveraged to measure equity.

Many indicators will be context specific and, ideally, the assessment team has access to stakeholders to gather input from different user groups about which indicators are most meaningful.

Indicators can be articulated in quantitative or qualitative form and can be objective or subjective.

Step 6 - Identify Indicators of Equity in the Program and Procurement Processes

- When developing indicators, the assessment team should select indicators relating to:
 - The full programmatic lifecycle from both the program consumer and program provider points of view, including awareness of opportunities, eligibility, registration, throughput, output, and outcome/impact.
 - Customer and contractor satisfaction with the process and outcomes as well as participation or response rates of different communities in feedback and other program design and management processes.
 - Resource burdens (e.g., cost, time) associated with using or receiving the service or becoming a subcontractor/provider for the service.
- Because each community has unique needs and histories, in addition to comparing marginalized communities to those that have traditionally been centered in program design, it may be appropriate to select indicators that allow the assessment team to:
 - explore each group’s trends individually as well as compared to different groups.
 - compare communities to population averages (e.g., agency, city, state, or nation).
 - compare communities that have some factor in common (different communities with access to the same resources or the same socio-cultural context in different physical locations), or
 - explore issues relating to saturation or coverage (e.g., compare adoption with pool of all possible or eligible candidates).

OUTPUTS

- List of indicators, measures, metrics, and scales against which the assessment team will gather and analyze data

For the program context “access” should be defined. Access may be defined in a variety of ways, including:

1. Availability of services, amenities, or products. Does the program offer the necessary service for the individuals who need them to achieve program outcomes? If not, those who need it have no access to that service.
2. Literal/physical access to a service or amenity. This includes physical ability to get to/enter or use the facility and/or technology access needed to participate in the program.
3. Access to information. Related to physical access, information must be presented and made available in a form that program participants can use. Language barriers, sight/hearing impairments, and technology illiteracy may all contribute to lack of access to information.

TOOLS AND RESOURCES

- Community Indicators Consortium Project Development Guide, <https://tinyurl.com/4w8rf9jp>
- Racial Equity Index Methodology, National Equity Atlas, <https://nationalequityatlas.org/about-the-atlas/methodology/indexmethod>
- MITRE library of equity indicators (contact MITRE)
- Community Indicators Consortium, Indicator Projects <https://communityindicators.net/indicator-projects/>

Step 7 - Identify Data Sources

METHODOLOGY

- **Identify the data and information sets that will support the assessment.** Based on the indicators identified in the previous step, the team should identify the data sets that need to be collected to support the analysis. Numerous data types could be used to support the assessment, including:
 - **Administrative records:** A source of evidence consisting of qualitative or quantitative data collected or produced as part of a program’s operation.

KEY CONSIDERATIONS

- To fill data gaps and address data quality concerns, evaluators might collect primary data through questionnaires or focus groups, or through use of commercial data.
- What equity related data has the program collected to calculate the identified metrics? Is there data available? If not, the team should consider this a key finding of the assessment. In addition, the team should document data needs that impair the ability to calculate metrics appropriately and identify alternate metrics based on available data.

Step 7 - Identify Data Sources

- **Laws, regulations, and policies:** The specific laws, regulations, and policies that authorized and chartered the program and framed the intended results. In addition, there are contextual laws, regulations, and case law that are related and can impact the operation and design of the program.
- **Program evaluation:** An assessment using systematic data collection and analysis of one or more programs, policies, and organizations intended to assess their effectiveness and efficiency. These tend to be ad hoc or event-based assessments that could be conducted by the program team (or contracted resources), the agency’s audit or compliance organizations, the Office of General Counsel (in the case of a compliant or lawsuit), or external government organizations, such as OMB, GAO, or the IG. These types of assessments may also be conducted by external third parties (these are not necessarily endorsed by the agency) such as university resource groups, studies and analysis by FFRDCs (MITRE, RAND, etc.) and other not-for-profit and advocacy groups (PEW, etc.).
- **Performance measurement:** The ongoing monitoring and reporting of a program’s accomplishments and progress, particularly toward its pre-established goals.
- **Environmental scan:** Environmental scans can help the assessment team identify external sources of information to inform recommendations. The environment scan can be focused on identifying research and knowledge developed by state, local, and other federal government programs, academia and resource organizations, or the private sector. These information sets generally do not contain specific information on the subject program but contain raw or refined data for analysis lessons learned, best practices, leading research and knowledge, etc.
- **Stakeholder feedback:** Many programs design mechanisms to collect “the voice of the customer” as part of their awareness activities to ensure that key stakeholders are engaged in the process. This could range from components of performance management systems where feedback is collected in an ongoing basis, to ad hoc surveys issued periodically to collect stakeholder feedback. If these mechanisms do not exist or lack the full set of information needed, the assessment team can design a stakeholder engagement strategy that can range from surveys to focus groups to interactive workshops.

KEY CONSIDERATIONS

To fill data gaps and address data quality concerns, evaluators might collect primary data through questionnaires or focus groups, or through use of commercial data.

- What equity-related data has the program collected to calculate the identified metrics? Is data available? If not, the team should consider this a key finding of the assessment. In addition, the team should document data needs that impair the ability to calculate metrics appropriately and identify alternate metrics based on available data.
- Are the identified data sets available for agency use? If the data is collected by another entity, is it already publicly available or shareable? Note that data sets with personally identifiable information, collected by other agencies and/or non-federal entities, may not be immediately shareable due to privacy laws.
- Based on the data sets identified and available to calculate metrics, what was the purpose of those data set collections? To what extent do those programs align with the use intended here, to determine level of access to program benefits and opportunities and/or procurement and contracting opportunities? What bias might result from the analysis of this data for equity purposes, based on the original purpose of the data collection?
- Time permitting, what new data sets may be required to support the assessment (internal, external, private sector, etc.)?

TOOLS AND RESOURCES

- Urban Institute Elevate Data for Equity <https://www.urban.org/elevate-data-equity>
- Urban Institute Data Catalog <https://datacatalog.urban.org/>
- MITRE Social Justice Data Catalog (contact MITRE)

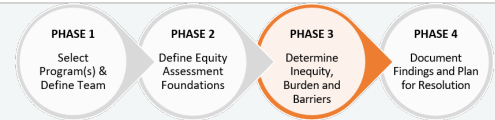
Step 7 - Identify Data Sources

- **Document data gaps and data quality issues that will adversely impact the assessment.** Equity assessment practitioners have documented substantial concerns relating to data for equity evaluation. Data is not collected consistently across regions, with sufficient granularity across or within underserved populations, or with sufficient frequency to cover many equity indicators. Additionally, there are many concerns over data quality, as prior data collection efforts may have been influenced by the very systemic biases the equity evaluations are seeking to disrupt. Assessment teams should avoid using program data for benchmarking or predictive analytics when there are data gaps for underserved populations or where there are known program access issues. Capture these gaps as assessment risks and develop mitigations to help close gaps (e.g., identify proxy information that could inform the team).

OUTPUTS

- Data and information inventory

Detailed Description



Phase 3 – Determine Inequity, Burden, and Barriers

Methodology and Outputs

Key Considerations, Tools, and Resources:

Step 1 - Conduct quantitative analysis to identify disparities in program or procurement lifecycle

METHODOLOGY

- **Evaluate the current capacity for the gathered data to provide disaggregated information for each metric.** Data that cannot be disaggregated, are not representative of underserved populations, collected through a biased sample, or not otherwise representative of the program population should be documented in the risk log.
- **Identify variances in equity and burden across communities.** Data analysis should be used to quantify disparities based on the definition of equity and the specified indicators and metrics. For example, calculate, based on community/population groups, the level of application and enrollment (those determined eligible and/or awarded) to receive program benefits, and compare across community/population groups. Depending on the particular set of indicators, data, time, and expertise available, techniques might include:
 - **Statistical Analysis/Modeling:** A form of evidence that uses quantitative measurements, calculations, models, classifications, and/or probability sampling methods to describe, estimate, or predict one or more conditions, outcomes, or variables, or the relationships between them. The ability to disaggregate the data and stratify metrics for as many user groups as possible (by race, ethnicity, age, sexual orientation, gender identity, ability, veteran status, age, etc.) improves the ability to identify disparities in service or procurement life cycle.
 - **Benchmarking Analysis:** A benchmarking analysis uses data from the environment scan to understand the performance (effectiveness and equity) results of similar-type programs. This will provide the team with a comparison of the target program performance against an industry average.
 - **Trend Analysis:** Trend analysis uses data from across multiple time periods and analyzes patterns to explain and interpret past events or forecast future events. Within an equity analysis, stratification and disaggregation can be applied to examine trends and changes in the rate of access, enrollment, participation, and outcomes within and between community/population groups.

OUTPUTS

- Quantified disparities based on selected indicators and programmatic definition of equity

KEY CONSIDERATIONS

- Approaches to identify disparate impact through, for example, adverse impact analysis or determinations of “substantially different rate” may be useful to guide quantitative analysis. In employment law, adverse impact is defined as “substantially different rate” of hiring or promotion, to the disadvantage of a race, sex, or ethnic group.” A “substantively different” rate may be defined by statistical significance tests or other thresholds. This long-standing approach to evaluating legal claims under civil rights laws is useful in considering how to define and measure equity. In equity assessments, however, the bar for evaluating whether all communities were served with equity need not reach the standards required to show disparate/adverse impact; instead, a finding that there is a distinction in communities/populations that access and/or receive benefits may be sufficient to show inequities.
- What counterfactuals might be explored? How do we know what part of the outcome was due to the policy or program?

TOOLS AND RESOURCES

- Evaluate, Collecting Data, Data Collection Methods, Racial Equity Tools
<https://www.racialequitytools.org/resources/evaluate/collecting-data/data-collection-methods>
- A Framework for Centering Racial Equity Throughout the Administrative Data Lifecycle, Amy Hawn Nelson and Sharon Zanti. September 30, 2020.
<https://ijpds.org/article/view/1367>

Step 2 - Conduct qualitative analysis to add context, identify disparities, and identify barriers

METHODOLOGY

- Use qualitative analytic methods to compare the processes, outcomes, and strategies of the program to the needs, resources, and perspectives of the identified underserved communities. By centering the experiences of underserved communities, the assessment team exposes assumptions and gaps in understanding and identifies unique barriers and burdens that drive disparities in access and effect. In addition, qualitative analysis will deepen an understanding of how the quantified disparities from Step 1 result from a misalignment of program design and delivery with the needs of a specific population/community. The qualitative analysis should include:
 - **An assessment of the program delivery lifecycle:** Document an end-to-end program delivery process diagram showing both the internal and external processes of acquiring/creating and delivering the program's benefits to the consumer. The diagram should include all inputs, outputs, and process steps. For procurement and contracting opportunities, identify how the agency advertises, solicits, or otherwise informs the public of such opportunities and general criteria used to evaluate contracting proposals. Additionally, the diagram should detail how the agency advertises the service to external consumers and supports engagement with consumers throughout service delivery. To assist in documenting the process, the assessment team can leverage the Journey Map and Service Blueprint tools described in Appendix A.
 - **An analysis of the system of systems for achieving the program's intended outcomes:** Develop system maps 1) centering on the program's overall life outcome (identified in Phase 2, Step 1) and 2) centering on the outcome of securing agency procurement and contracting opportunities (or, alternatively, successfully delivering subcontractor services). Identify all causal factors and resources that contribute to the outcomes, and then assess the resources and perspectives of the user groups against the identified factors. The more decomposed the system map, the easier it will be to identify burdens and barriers. This analysis helps identify factors that may be out of the control of the government, but do create or sustain disparities.

KEY CONSIDERATIONS

- The more detailed and encompassing these artifacts are, the more effectively they will expose disparities and barriers.
- This program analysis can also identify inefficiencies in program operations or barriers that may impact effectiveness. These should be captured in the recommendations. When a program is not delivering the intended results, it is important to understand whether the challenge lies with the authorization (the strategic and policy documents that are developed by agency leadership to provide guidance to the team that will design and stand up the program) or if it lies with how the program is operated.
- How might the theory of change be out-of-date? How have research/analysis or contextual factors (political, economic, etc.) changed since the program's inception?
- Is the program well funded? What is the impact of underfunding on underserved communities?
- Can we translate personas and citizen expert narratives into measurable factors to supplement our quantitative analysis?

TOOLS AND RESOURCES

- MITRE F.A.I.R. Framework (contact MITRE)
The F.A.I.R. Framework integrates community voices into quantitative and qualitative research, analysis, modeling, and simulation. It is a systematic methodology to identify and explore the architecture of disparities and the design of equity. It helps clarify the structural elements that lead to a community's experience of a certain outcome in a given space (e.g., disparities in health; persistence of poverty). This structured process supports both quantitative and qualitative research efforts.
- Service Blueprint Canvas (MITRE)
<https://itk.mitre.org/service-blueprint>

Step 2 - Conduct qualitative analysis to add context, identify disparities, and identify barriers

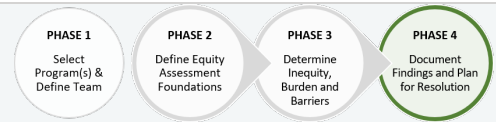
- **An analysis of the program policy:** Consider policy and regulatory guidance relating to the program, particularly concerning eligibility and policy shaping the implementation of the program delivery mechanisms. This includes specific program statutes, regulations, and sub-regulatory policies and PRA information collection requests mapped to specific points on the program lifecycle. In addition, study rulings regarding access, equity, and discrimination in the subject program. To support procurement/contracting equity assessment, identify the agency's policies that regulate the acquisition processes, particularly those that govern programs established to support small and disadvantaged businesses.
- **Vet the aforementioned artifacts with citizen experts and key stakeholders representing the identified underserved communities:** Gather citizen experts from the priority population(s) (both potential service consumers and potential subcontractors) and key stakeholders to evaluate the program delivery process, causal models, policy findings, and other elements of the program (e.g., program outcomes and strategies from Phase 2, Step 1) through structured facilitation to provide context and identify barriers. Alternatively, these artifacts might be jointly developed/ documented with citizen experts.
 Additionally, the assessment team might use this interaction with citizen experts, through tools such as surveys and focus groups, to gather more experiential data such as throughput times to feed qualitative analysis and/or interpret the results of any earlier qualitative analysis or research findings. This context from citizen experts is critical to achieving accurate, unbiased interpretation of data and findings.
- If citizen experts are not available, the assessment team can:
 - Identify local organizations and organizations that represent the citizens to act as proxy/representatives.
 - Leverage the community perspective developed in Phase 2, Step 5 and compare concepts from those personas and journey maps to the elements of the program. This approach may be ideal due to time limitations but is more likely to result in missed insights and biases that could disadvantage underserved populations.

OUTPUTS

- End-to-end program delivery process diagram
- System maps of causal factors and resources that contribute to the outcomes
- Identification of specific barriers or burdens borne by underserved communities in access to benefits and services or in taking advantage of agency procurement and contracting opportunities
- Context to inform the results of the quantitative and qualitative assessments and the development of recommendations

- Service Blueprint Canvas (MITRE)
<https://itk.mitre.org/service-blueprint>
- Journey Mapping (MITRE)
<https://itk.mitre.org/journey-mapping>
- MITRE system dynamics models for social justice (contact MITRE)
- Insight Maker, web-based system dynamics tool
<https://insightmaker.com>
- MITRE PolicyNet platform for policy and regulatory analysis (contact MITRE)
- How to Design and Manage Equity-Focused Evaluations, UNICEF, <https://agora.unicef.org/course/info.php?id=1238>

Detailed Description



Phase 4 – Document Findings and Plan for Resolution

Methodology and Outputs

Key Considerations, Tools, and Resources:

Step 1 - Conduct quantitative analysis to identify disparities in program or procurement lifecycle

METHODOLOGY

- **Capture Observations:** Observations, data, and other artifacts/ outputs should be codified and stored where they are accessible to the assessment team to allow for continued review and analysis. These observations must be captured as fact-based without judgement or bias. It is also important to document shortcomings in the data, as well as where data was not available or usable, or other limitations that should be remedied going forward.
- **Determine Themes:** Categorize qualitative, quantitative, and codified data to identify emerging themes. Evaluate and discuss among the assessment team to prioritize, combine, pair, and/or sequence the themes. Time permitting, engage with internal stakeholders to help provide relevant information or context. Additionally, academic and grassroots organizations that serve the community stakeholders and/or have specific domain knowledge and expertise may have published research available that can add context to the identified themes.
- **Develop Preliminary Insights:** Determine early insights based on the information gathered during this assessment. Critically evaluate how these insights may be limited or skewed based on the potential biases or limitations inherent in the data set, information gathering process, access to stakeholders, and/ or time and resource constraints. It is important to remember that these initial insights are not static conclusions and that the program should continually improve its ability to gather data and engage stakeholders in the process of co-creation.

KEY CONSIDERATIONS

Open and Transparent Government

- Promote open and transparent government by sharing data, knowledge, and research gleaned from the assessment process.
- Provide insight into the process, to include stakeholder engagement and data sources used.
- Consider new and innovative ways of engaging citizens and creating transparency by bringing them into the process of creating solutions that work.
 - How might we convene a community panel to create partnerships with communities?
- Consider new and innovate ways of engaging other programs and creating cross-agency transparency by partnering.
 - How might we shift the power dynamics to enable communities to remedy issues to allow the creation of ways that meet their needs and also meet program goals?

TOOLS AND RESOURCES

- **Mind Mapping**
<https://itk.mitre.org/mindmapping/>
 Card Sorting -
 This hands-on activity allows participants to communicate and document their mental model and how they think about a specific set of information. It creates a logical structure (e.g., relationships, sequences, timing) among related informational entities.
<https://itk.mitre.org/card-sorting/>
- **Stormdraining**
 The inverse of brainstorming, Stormdraining aims to reduce a large collection of ideas, activities, or components to a smaller collection of the most valuable or promising ideas.
<https://itk.mitre.org/stormdraining>

Step 2 - Document Initial Findings and Lessons Learned

METHODOLOGY

- Document Initial Findings: Synthesize observations, themes, and insights to develop initial findings as set forth by the Executive Order. The initial findings must provide answers to the following questions:
 1. What potential barriers do underserved communities and individuals face to enrollment in and access to benefits and services in federal programs?
 2. What potential barriers do underserved communities and individuals face in taking advantage of agency procurement and contracting opportunities?
 3. What, if any, new policies, regulations, or guidance documents may be necessary to advance equity in agency actions and programs?

Based on the initial findings, there may be some emerging recommendations or potential solutions. Be sure to document these as well, while clearly stating that they are initial recommendations and that additional solutions are likely to be identified as part of Resolution Planning. If community stakeholders were not included in the assessment team, it is also important to clearly state that the initial findings and recommendations will need to be further validated and verified by community stakeholders.

A note on business process:

An equity assessment will likely reveal areas of opportunity for improvement that are not problems of inequity, but rather problems related to inefficient processes. This is not to say that inequity and other problems in program delivery are mutually exclusive; both may exist. To understand where process improvements may be needed, look for these symptoms of process inefficiency:

- Long wait times; excessive rework or errors; undefined or outdated service outcome goals; frequent exception cases with no approved process; unbalanced benchmark data; critical functions or decisions routed unjustifiably to exclusive workforce members; bottlenecks across the program; underutilization of data analytics to track progress; lack of, or inadequate mechanisms for, the continuous monitoring of workforce management and resourcing. Other symptoms can include lack of sufficient feedback mechanisms to support continuous improvement and enhanced customer service, and insufficient training and/or adherence to customer service standards

KEY CONSIDERATIONS

Support and Advance an Engaged Citizenry

Communication should be with and not just to communities, and communication should be done in a manner that reflects ongoing partnership with citizen experts and key stakeholders. This helps ensure that context is captured throughout the process so that underserved communities not only have a voice in defining solutions that affect them, but they are equal creators in the creation of those solutions. In some cases, communities may lead the development of solutions during the Resolution Planning phase after the initial equity assessment.

- How might findings be shared across agencies and with stakeholders?
- What type of feedback mechanisms can be put in place?

Equity as a Process

Explore not only equity in the program/policy, but also lessons learned about the assessment process so that the equity assessment process can be improved and applied more completely and consistently in the future. Consider how these recommendations might apply more broadly.

- What data should the program collect going forward?
- What additional training/skills might we need on our team?
- What citizen expert and stakeholder relationships should be affirmed or expanded?
- How might we shift the power dynamics to enable communities to remedy issues to allow the creation of ways that meet their needs and meet program goals?
- What is the right process for maintaining current knowledge about how the program might create, sustain, or exacerbate disparities?
- What programmatic partnerships might be necessary to do the greatest good (for example, bundling housing with behavioral health support and financial literacy training)?

Step 2 - Document Initial Findings and Lessons Learned

Document Lessons Learned and Demonstrated Best Practices

Lessons learned and best practices should be documented throughout the assessment process, as it is easier for teams to capture them on a rolling basis rather than attempting to recall them at the end. It is important to capture not only what worked well, but also what did not. Those activities that did not work well provide critical knowledge and learning that the assessment team can leverage going forward.

OUTPUTS

- Initial Findings Report that provides answers to Section 5 of the Executive Order
- Key Observations, Themes, and Insights documented
- Lessons learned and best practices documented

Business Process Improvement Techniques

Techniques that are useful in the identification and remediation of business process problems include:

- Capability Modelling
- Lean Six Sigma
- Design Thinking
- Service Blueprinting
- Process Diagramming
- Voice of the Customer Studies

TOOLS AND RESOURCES

- Rose, Bud, Thorn (MITRE)

This framework helps a user or group conduct an analysis by visually categorizing positive (rose), potential (bud), or negative (thorn) aspects of a topic (e.g., system, product, process).

<https://itk.mitre.org/rose-bud-thorn/>

Step 3 - Plan for Next Steps

Once the initial equity assessment is complete, Resolution Planning is the next phase. In Resolution Planning, the broad next steps are to engage with critical stakeholders (if not already done as part of the initial assessment), verify and validate initial findings, develop solutions to address inequities, and develop the Resolution Plan. The outcome of this phase will be the Resolution Plan, which is the plan for addressing any identified barriers to full and equal participation.

A brief description of what is expected per step is included to support reader understanding; however, specific details must be developed by the Resolution Planning team.

Resolution Planning Steps

1. Engage with critical stakeholders.

The objective of this step is to engage with a representative and comprehensive set of stakeholders who are critical to the success of addressing the agency's inequities. Critical stakeholders must include community stakeholders (e.g., those who have lived experience or are currently living with the problem). Community stakeholders also include communities that will be impacted by the potential solution(s). These stakeholders play a key role in the development of solutions: Without the engagement of stakeholders from communities who will be directly affected by proposed solutions, the likelihood of success decreases.

KEY CONSIDERATIONS

Prior to Resolution Planning, the assessment team has identified the following in the findings report:

- Potential barriers that underserved communities and individuals may face to enrollment in and access to benefits and services in federal programs
- Potential barriers that underserved communities and individuals may face in taking advantage of agency procurement and contracting opportunities
- Whether new policies, regulations, or guidance documents may be necessary to advance equity in agency actions and programs

Areas of concern that were previously identified should be verified and validated to determine if the preliminary findings are valid. To do this, teams must collect qualitative and quantitative data that may not have been previously accessible.

Step 3 - Plan for Next Steps

When community stakeholders are included, it is more likely that solutions created will meet the needs of the community. Equity assessments must be equitable in the process itself, and paramount to this is engaging communities in the co-design of both the assessment and the solution.

Community stakeholders may have multiple roles, including but not exclusive to:

- Providing data and feedback on the current program
- Participating in review and validation of the initial findings
- Fully engaging as part of the problem-solving team
- Participating in the design of solutions and their implementation

Developing and implementing solutions without co-creating with impacted communities is not advised. If communities were not part of the initial equity assessment process, then they must be involved with vetting and validating the problem and developing any proposed solutions. If communities were part of the initial equity assessment process, then ensure their continued engagement. The method and manner of engagement should not only be amenable for the agency, but should work for stakeholders as well; otherwise it will be ineffective.

The key is to work with communities, as they are citizen experts and understand the needs and barriers they face. Proxy organizations can and should be engaged as well. Proxy organizations are important when direct access to stakeholders is not achievable or recommended. Proxy organizations include non-government organizations, not-for-profits, community organizations, civil rights and civil liberty organizations, and more. The [U.S. Public Participation Playbook](#) offers insight and techniques to engage communities.

2. Verify and validate initial findings.

The objective of this step is to ensure that the team is solving the right problem. Taking action on the wrong problem will not yield favorable results and can create more inequity.

It is critical to verify and validate the initial findings with the community, especially if community stakeholders were not part of the initial equity assessment team. This step may involve revisiting the initial findings, modifying their conclusions, and/or reaching new conclusions based on new data or information. Consider what resources will be needed to collect new data, augment existing data, and/or assess the fuller set of data. In addition, consider what resources may be required to compensate community stakeholders for their time, input, and contributions.

Equity assessments are equitable in both process and outcomes, and equity cannot be assessed without the engagement and participation of the impacted stakeholder groups who may bear the burden of the inequity. Stakeholder engagement is a critical part of this process. Understanding the problem(s) and design solution(s) should be done with citizen experts in a participatory process that allows for the co-creation of more equitable and more effective outcomes. Those who have the lived experience of the inequity must be centered in this work to ensure their voices are not only heard but integrated into the process.

TOOLS AND RESOURCES

U.S. Public Participation Playbook

<https://digital.gov/guides/public-participation>

Step 3 - Plan for Next Steps

3. Develop solutions to address inequities.

The objective of this step is to co-design solutions that will address the agency's inequities. Be sure that the proposed solutions solve the problem(s) at hand and remedy the inequity. Using the barrier analysis to identify specific focus areas, the proposed solution(s) should identify policy, business process, information technology, organizational capacity/skill sets, data, and public engagement approaches to address equity problems.

Consider small scale tests and pilots to determine the impact of the proposed solutions. Again, co-creation with communities is critical, and Community Based Participatory Research, Participatory Design, and/or Equity Driven Design Thinking are recommended approaches.

4. Develop the Resolution Plan.

The objective of this step is to develop the Resolution Plan, which is the plan for addressing any identified barriers to full and equal participation. This plan should capture key information that has been developed in the preceding steps:

- How to implement the proposed solutions and recommendations.
- Estimated benefits from implementing proposed solutions, as well as a benefits realization timeline.
- Scope of implementation and change required for people, process, technology, policy, etc.
- Estimated timeline for implementation.
- Estimated costs for implementation.

The Resolution Plan should also include any supporting resource requests, (i.e., budget requests, skills needed, additional information requirements, (re)training for staff or other actions to ensure proper implementation, etc.) required to take action on the proposed solutions.

Appendix A How-to: PAINstorming, Personas, and Journey Maps

Note: This section provides a “how-to” guide to developing PAINstorming, personas, and journey map artifacts. The terms users, communities, and groups are used to characterize the various stakeholder groups that the team wishes to better understand. Development of these artifacts is best done in a workshop session and if available, with the guidance of a skilled facilitator.

Tip: Consider PAINstorming when time limitations exist. Though PAINstorming is not limited to use only when time limitations exist, it provides a light version of journey mapping and persona development that can be useful in better understanding the user experience.

PAINstorming	Personas	Journey Map
<p>The outline below walks you through the PAINstorming activity. This should be done for each persona of interest. Stakeholders have different perspectives and needs, so it is better to capture each separately to understand the various experiences across diverse groups.</p> <p>Tip: Use anecdotal evidence to inform your persona(s) and PAINstorming activity, if available.</p>	<p>Developing personas is a technique used to create a visual story that enables the program to better understand the user demographics, their needs, wants, and aspirations, and other information that helps create a greater understanding of who they are.</p> <p>Personas promote empathy; they provide a way of seeing who interacts with your program or service.</p> <p>Persona development is typically based on primary research gathered through interviews, surveys, and other means of data collection to help understand the community. Personas can also include information on education, values and beliefs, goals, thoughts, and other information to aid in understanding the persona.</p>	<p>The journey map can provide a view of a “day in the life” of stakeholder communities as they realize the intended results of the program. This not only includes their interaction with the program itself but all their peripheral actions.</p> <p>Several types of journey maps can be created, depending on team needs and goals. Types of journey maps include:</p> <ul style="list-style-type: none"> ▪ Service Blueprints ▪ “As-Is” or Current State Journey Map ▪ “To-Be” or Future State Journey Map ▪ “Day in the Life” Journey Map <p>An equity assessment team may gain the most value from a service blueprint and/or an “as-is” journey map. The details on how to create these types of journey maps are provided below.</p>

How to PAINstorm	How to Develop a Persona	How to Journey Map (two examples included below)
<p>Try this PAINstorming template: https://itk.mitre.org/painstorming</p> <p>Using a sheet of paper or (virtual) white board, answer the questions below.</p> <p>STEP 1: Persona: Who are you trying to better understand? Think about the community the team would like to better understand. What are their attributes and characteristics? Name and write a brief description of the persona.</p> <p>STEP 2: Activities: What job does the persona need to have done? In other words, why do they require/use your program or service? What do they do to access your service? Describe this from the point of view of the persona, not your agency.</p> <p>STEP 3: Insights: What happens when the persona cannot utilize your program or service as intended due to barriers (physical, organizational, infrastructure, resources) and/or system failure (inequity)?</p> <p>STEP 4: What are the processes, activities, and tools your persona uses to “work around” barriers or system failures? Capture if these workarounds do more harm than good and capture what value these workarounds provide that could be introduced into your program/ service?</p> <p>STEP 5: Needs: Dig deeper into why the persona is experiencing your program or service differently than intended. <i>What needs do they have that are not being met and what are the consequences impact(s) of these unmet needs? What are the second and third order consequences?</i></p>	<p>STEP 1: Collect information about your persona. This can be done via surveys, interviews, feedback, research, etc.</p> <p>STEP 2: Create at least two types of personas that represent your underserved communities who may experience inequity.</p> <p>STEP 3: Personas can include but are not limited to the following information:</p> <ul style="list-style-type: none"> ▪ Fictional name ▪ Age ▪ Gender ▪ Marital status ▪ Family information ▪ Location, birthplace, and/or nationality ▪ Race ▪ Occupation ▪ Education ▪ Hobbies ▪ Technology familiarity ▪ Languages spoken ▪ Favorite quote(s) ▪ Overall life goals/aspirations/ motivations ▪ Pain points/needs ▪ Demographic and other data that describes the persona <p>STEP 4: Name the persona and add a fictional image to aid in visualizing the persona.</p> <p>STEP 5: Solicit feedback on the persona. At this stage you may not be able or ready to engage stakeholders; however, you can collect feedback from within the organization to confirm/validate the persona.</p>	<p>Try this Service Blueprint template: https://itk.mitre.org/service-blueprint</p> <p>A service blueprint can help to demonstrate what is happening “behind the scenes.” It helps to establish the experience and accelerate the process of understanding the service and how it connects with people. Additionally, it provides insights into critical moments throughout the experience and possible opportunities for improvement.</p> <p>How to create a Service Blueprint:</p> <p>STEP 1: Identify the problem space that is key to the success of your service/program. The opportunity space should be easy to understand, include a simple subject matter, and be based on data.</p> <p>STEP 2: Pick the scenarios within your problem space that will have the most impact. Develop a scenario statement using the following format: “A user wants/tries to ____, and experiences ____, resulting in ____.” Then, break down your scenario into steps and touchpoints.</p> <p>STEP 3: Hold a blueprinting workshop with relevant stakeholders and users to develop the end-to-end view of each scenario. If you do not have access to stakeholders/users, work with those who interact and work closely with your stakeholders. Lay out the steps and touchpoints beforehand, and add detailed layers to capture the critical moments and ideas.</p> <p>STEP 4: Separate the critical moments and ideas to identify insights, inequity and potential service improvements. Look to amend critical moments that could leave the user dissatisfied with the service and instances of inequity that are present.</p>

How to PAINstorm	How to Develop A Persona	How to Journey Map (two examples included below)
		<p>STEP 5: Out of the critical moments and ideas, themes will emerge for service improvements. Create categories and relationships between themes.</p> <p>STEP 6: Take action on the strategic fixes to drive service improvement.</p> <p>Try this Journey Mapping Template: https://itk.mitre.org/journey-mapping</p> <p>How to Develop a Current State Journey Map</p> <p>Current state journey maps illuminate pain and opportunity points from the users' experience and perspective. They account for their touchpoints with your program/services and also their feelings, motivations, behaviors and thoughts. Current state journey maps can also provide insight into other activities that affect users that are relevant to their experience with the program/service. They can also shed light on other forms of inequity the user may experience and how it shapes their life, choices, and activities.</p> <p>STEP 1: Establish the “why” and the “what.” Answer the following key questions before beginning the process:</p> <ul style="list-style-type: none"> ▪ What goal does this journey map support? ▪ Who will use it? ▪ Who is it about and what experience does it address? ▪ How will it be shared?

How to PAINstorm	How to Develop A Persona	How to Journey Map (two examples included below)
		<p>STEP 2:</p> <ul style="list-style-type: none"> Gather existing research and base this exercise on truthful narratives. This is a qualitative research process to tell the complete story. Ask about the actions involved, pain points, wins or successes, and opportunities. <p>STEP 3:</p> <ul style="list-style-type: none"> Collaborate with others; the exercise of filling out the journey map (not the output itself) is often the most valuable part of the process. Invite stakeholders to contribute to compiling data and building the map. This should be a very inclusive activity, with a diverse collection of participants who bring different perspectives and experiences. <p>STEP 4:</p> <ul style="list-style-type: none"> Synthesize the data before moving on to creating the visual. <p>STEP 5:</p> <ul style="list-style-type: none"> Engage others with the end product and solicit feedback.

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