



Organization: The Council on Black Health

Responding to Area Section 1 – Equity Assessments and Strategies

Organization Overview: Since its inception in 2002, The Council on Black Health (the Council) formerly known as the African American Collaborative Obesity Research, Network (AACORN), has become a premier research organization that develops and distributes information about ways to improve the health profiles of Black Americans. There is a growing number of organizations that have begun to elevate their presence in health-related issues affecting the Black community. Importantly, the Council has the unique distinction of engaging a mix of academic researchers; federal, state, and local government; private foundations; national and local community organizations; national and local thought leaders; and community members in conversation and action to develop, implement, and oversee a national Black health agenda.

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Area 1. Equity Assessments and Strategies. Approaches and methods for holistic and program- or policy-specific assessments of equity for public sector entities, including but not limited to the development of public policy strategies that advance equity and the use of data to inform equitable public policy strategies.

The Council on Black Health is a research organization that aims to develop and promote solutions that achieve healthy Black communities. Many policies and ordinances surrounding health and social determinants of health are not developed with Black populations in mind and further contribute to Black health inequities. To adequately address this issue, it is imperative that equity be the driving force behind each policy decision.

Several methods and strategies exist for identifying systemic inequities to be addressed in agency policy, one of which is the Policy Equity Assessment. The Policy Equity Assessment has three stages of assessment with guiding questions to identify systemic inequities in policies or programs. The Policy Equity Assessment can be used at different stages of the policy development and implementation process and, unlike many other equity assessments, it is not solely designed to be used prior to the development of policy. The three stages include the logic stage, capacity stage, and research evidence stage.

- In the logic stage, agencies will assess what the policy is designed to do and whether the policy sets explicit goals to address racial/ethnic health inequities.
- In the capacity stage, agencies will determine if the policy has the capacity to meet the needs of the eligible population and those of each racial/ethnic group. This would include identifying racial/ethnic inequities in access to and distribution of policy benefits.
- In the research evidence stage, agencies will conduct research to determine if the policy is effective for the defined target population and if it reduces the identified inequities.

From start to finish, the Policy Equity Assessment can be an extensive and time-consuming process, but it has been effective in identifying policy inequities in a study conducted by Joshi et al. in 2014. In this study the Policy Equity Assessment was applied to three policies, one of which was the Family and Medical Leave Act (FMLA). Analysis during the logic stage found that the act's objectives do not explicitly mention improving outcomes for racial/ethnic minorities. During the capacity analysis researchers found that only an estimated 54% of working parents meet FMLA eligibility criteria. Also due to the unpaid nature of FMLA, many eligible workers don't utilize the benefits because they cannot afford losing pay. This creates a disproportionate burden on low income working parents, many of whom are racial/ethnic minorities. Lastly, they were unable to completely assess differences in FMLA coverage based on race/ethnicity due to a lack of data reported on this demographic. In the research evidence analysis, FMLA was shown to have a positive impact overall, but low-income workers experienced disproportionate barriers to use. The information provided by the assessment can provide OMB with a target for policy adjustments that address the identified inequities.

In addition, the guiding questions for each stage of the Policy Equity Assessment can be modified to reach the desired demographic. Although it was designed with racial/ethnic inequities in mind, it can be used to identify inequities faced by other underserved communities such as low income, LGBTQ+, women, and individuals with disabilities.

It is important to note that although the Policy Equity Assessment has been demonstrated to be effective in the study conducted by Joshi et al. 2014, it has not been evaluated or compared to other assessments for effectiveness. There is growing literature surrounding equity assessment and the need for such tools; however, most if not all have not been evaluated. It would be advantageous for OMB to fund research to conduct a systematic review of equity assessment tools and strategies for effectiveness in identifying and reducing inequities faced by underserved communities.

To conclude, the Council on Black Health is pleased to see government agencies such as OMB taking the initiative to acknowledge and address inequity in federal policies and programs. In addition to engaging with and seeking input from stakeholders within underserved communities. The Council on Black Health continuously strives to develop and promote solutions to achieve healthy Black communities. Our ability to do so would greatly benefit from equity being the driving force behind all federal, state, and local policy work.

References:

Joshi, P. K., Geronimo, K., Romano, B., Earle, A., Rosenfeld, L., Hardy, E. F., & Acevedo-Garcia, D. (2014). Integrating Racial/Ethnic Equity Into Policy Assessments To Improve Child Health. *HEALTH AFFAIRS*, 33(12), 2222–2229. <https://doi.org/10.1377/hlthaff.2014.1169>