

<b>ACF</b>  <b>Administration</b>  <b>for Children</b>  <b>and Families</b>	<b>U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES</b> <b>Administration for Children and Families</b>	
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**TO:** State, tribal and territorial human service commissioners; state, tribal and territorial agencies administering or supervising the administration of all programs funded by the Administration for Children and Families.

**SUBJECT:** Equity in Action: Prioritizing and Advancing Racial Equity and Support for Underserved Communities

**PURPOSE:** The purpose of this information memorandum (IM) is to state the Administration for Children and Families’ (ACF) unequivocal commitment to advancing racial equity for all. ACF strongly encourages its grantees to assess and address how its programs and policies may perpetuate systemic barriers for children and families of color. This IM calls for transformational leadership at all levels to ensure that Americans of all racial and ethnic backgrounds can reach their full potential.

**INFORMATION:** In support of the Biden-Harris Administration’s position, this IM outlines the significance and importance of racial equity as a fundamental principle underpinning the work of the Administration for Children and Families (ACF) and the more than 60 programs it administers. The IM highlights research findings identifying racial and ethnic disparities with implications for service delivery of ACF-administered programs and proposes actions grantees can take to further equity.

## **I. Background**

On January 20, 2021, President Joseph R. Biden released, Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*, which outlined the Biden-Harris Administration’s equity agenda. EO 13985 stated: “Equal opportunity is the bedrock of American democracy, and our diversity is one of our country’s greatest strengths...Entrenched disparities in our laws and public policies, and in our public and private institutions, have often denied that equal opportunity to individuals and communities” (U.S. President, EO 13985 2021, 7009).

The President directed that “the Federal Government should pursue a comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality” (EO 13985, 7009). In accordance with EO 13985, the focus of this IM is on advancing racial equity. Focusing on racial equity provides a specificity that will allow for maximum impact. ACF intends to build upon the frameworks, resources, and tools developed in the initial focus on racial

equity to also address equities across other marginalized and underserved communities, including members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; and persons who live in rural areas.

## **II. The Impact of Racial Inequity**

President Biden has noted that when we fail to achieve racial equity, the American Dream remains out of reach for too many. Our country is facing converging crises that have exposed and exacerbated inequities, “while a historic movement for justice has highlighted the unbearable human costs of systemic racism.” (EO 13935 2021, 7009).

Researchers have explored issues of racial equity and the intersection of poverty and the well-being of children and families. Racism has been identified as a “social determinant of health” (CommonHealth Action 2016, 4). “Social determinants of health” is an umbrella term used to describe conditions in the environments where people live—such as access to transportation, economic stability, and food security—that affect long-term mental and physical health.

What happens during childhood can have lifelong implications. Adverse Childhood Experiences (ACEs), which include potentially traumatic, unsafe, or unstable experiences occurring before age 18, have been linked to chronic health problems and mental illness throughout the life span (USDHHS, CDC, *Preventing Adverse Childhood Experiences* 2021). Children of color are more likely to experience Adverse Childhood Experiences. According to Sacks and Murphey (2018), “Nationally, 61% of Black non-Hispanic children and 51% of Hispanic children have experienced at least one ACE, compared with 40% of White non-Hispanic children and only 23% of Asian non-Hispanic children.”

The clear link between racial inequity, social determinants of health and health outcomes has been underscored by the Centers for Disease Control and Prevention:

A growing body of research shows that centuries of racism in this country has had a profound and negative impact on communities of color. The impact is pervasive and deeply embedded in our society—affecting where one lives, learns, works, worships and plays and creating inequities in access to a range of social and economic benefits—such as housing, education, wealth and employment. These conditions—often referred to as social determinants of health—are key drivers of health inequities within communities of color, placing those within these populations at greater risk for poor health outcomes (USDHHS, CDC, *Racism and Health*, 2021).

Racial inequity also has an impact on the economic condition of individuals, communities and the entire nation. Racial income inequality is estimated to cost the U.S. economy \$2.3 trillion per year, an amount expected to increase as the workforce includes a larger percentage of people of color if inequity remains the same (Langston et al. 2020, 11). Structural and systemic barriers to economic mobility can be contributing factors to limiting access to good jobs and stable employment (Langston et al. 28-29). On average, White workers with only a high school diploma and Native Americans with an associate degree have similar earnings; Black workers with an associate degree earn less than White workers with a high school diploma (Langston et al. 24).

In 2020, persons of color were disproportionately impoverished:

RACE/ETHNICITY	POVERTY RATE	POPULATION DISTRIBUTION
United States Total	11.6%	99.7%
American Indian/Alaska Native	21.4%	0.8%
Black	19.8%	12.4%
Hispanic	17.1%	18.8%
Multiple Races	12.8%	2.1%
White	8.3%	59.6%
Asian/Native Hawaiian and Pacific Islander	8.0%	6.3%

SOURCE: Kaiser Family Foundation. “2020 Poverty Rate by Race/Ethnicity (CPS) and 2020 Population Distribution by Race/Ethnicity (CPS).” *Kaiser Family Foundation State Health Facts-Demographics and the Economy*, October 5, 2021. KFF estimates based on the Census Bureau's March Current Population Survey. Data Source: U.S. Census Bureau, CPS: Annual Social and Economic Supplements, 2017-2021.

One significant impact of disparate poverty levels is the heightened risk of minority families entering the child welfare system (Fong 2017, 5-13). Poverty is also associated with poor housing, homelessness, food insecurity, inadequate child care, and negative physical, and behavioral health outcomes (American Psychological Association 2009).

On the topic of structural racism, the ACF Office of Planning, Research and Evaluation (OPRE) report #2017-69, *Identifying Racial and Ethnic Disparities in Human Services*, noted that “although U.S. laws and policies forbid discrimination based on race and ethnicity, institutional policies and practices can still fuel, magnify, and perpetuate existing inequities—even if an organization or agency applies its policies and practices equally without regard to race, ethnicity, gender, or other demographic difference” (McDaniel et al. 2017, XIII). Therefore, deliberate comprehensive action must occur to advance an equity agenda across government. EO 13985 directs government agencies to take a systemic approach to redress inequities in policies and programs that serve as barriers to equal opportunities. It is against a backdrop of Presidential leadership, research findings, statistical data, and innovative work at the federal, tribal, state, territorial, and local levels that ACF pledges its support, skills, and resources to the Biden-Harris Administration’s efforts to advance racial equity and support for marginalized and underserved communities.

### **III. Elevating Equity at the Administration for Children and Families**

In April 2021, ACF announced the launch of an ambitious equity agenda with the goal of eliminating inequities within federal programming, as well as within the administration of human service programs at ACF and in the jurisdictions. The work will be ongoing and involve the entirety of ACF. ACF has established an internal Equity Advisory Group with representation from each ACF program office. One critical charge of the Equity Advisory Group is to shepherd the establishment of program-specific Equity Action Plans that outline the sustainability and accountability for outcome-based strategic plans to advance equity.

ACF’s internal engagement strategies include: conducting staff training; supporting Employee Resource Groups; promoting employee well-being; assessing agency human resources practices,

programs, policies, and procedures; strengthening equitable, accessible, and inclusive employment practices; expanding the role of the Office of Diversity Management and Equal Employment Opportunity (ODME); maintaining a zero-tolerance policy against discrimination, harassment or retaliation; strategic planning; and establishing an agency-wide Council on Diversity.

Several strategies are currently being employed in ACF office activities and programs that support the agency's commitment to improved outcomes for marginalized and underserved communities:

Through the OPRE-funded Racial and Ethnic Disparities in Human Services Analysis Execution Project, ACF is examining existing program administrative and survey data to analyze potential racial and ethnic disparities in two ACF programs. This project builds upon work conducted under a prior project, including the 2017 report, *Identifying Racial and Ethnic Disparities in Human Services: A Conceptual Framework and Literature Review* (McDaniel et al. 2017), which summarized existing research on racial and ethnic disparities in access, services and treatment, as well as outcomes within six ACF human services programs offering a conceptual framework for distinguishing racial and ethnic "disparities" from "differences." ACF's evaluation policy confirms ACF's commitment to evaluations designed to represent the diverse populations that ACF programs serve and to encourage diversity among those carrying out the work through building awareness of opportunities and building evaluation capacity among underrepresented groups (ACF 2012) (USDHHS, ACF, OPRE 2021, 2).

Complementing its history of anti-racism in action, the Office of Head Start's (OHS) *Advancing Racial and Ethnic Equity in Head Start Webinar Series* "promotes anti-bias and anti-racism strategies that Head Start and Early Head Start programs can use in practices, services, and systems." Viewers are encouraged "to reflect on individual perspectives and recommit to building program environments that communicate genuine care, value, and respect for all children, families, and staff" (USDHHS, ACF, OHS, 2021).

In efforts to address racial disproportionality and disparity, "the child welfare field has moved from acknowledging the problem of systemic racial and ethnic disproportionality and disparity to forming and implementing solutions" (Child Welfare Information Gateway 2021, 1). The Children's Bureau recognizes the need to focus on equity throughout the child welfare continuum and has identified resources with strategies for reducing and eliminating disproportionality and disparity within the child welfare system (Child Welfare Information Gateway 2021, 12).

ACF is working in partnership with HHS and the Office of Management and Budget to study methods for assessing agency policies and identify actions to assist agencies in assessing equity with respect to race, ethnicity, religion, income, geography, gender identity, sexual orientation, and disability. ACF is focused on making "advancing diversity, equity, inclusion, and accessibility a priority component of the agency's management agenda and agency strategic planning" (U.S. President, EO 14035 2021, 34596). In developing ACF's strategic plan framework, the agency integrated the perspectives and experiences of program participants in the

design, management, evaluation, and decision-making of ACF programs and operations. ACF held interviews and listening sessions with ACF grantees and beneficiaries to ensure that our strategic plan is anchored in the needs of our broad stakeholders, children and families.

#### **IV. Elevating Equity in Human Services Agencies**

ACF recognizes and acknowledges the foundational racial equity work done by federal, tribal, state, territorial, and local government agencies and non-government organizations. After the spring of 2020, when the public outcry against systemic racism reached its crescendo, governors and mayors across the nation were galvanized to address racial inequities within their jurisdictions in a more intentional manner. Officials employed several strategies to advance equity. Many states have a governor-appointed Diversity, Equity, Inclusion, and Accessibility (DEIA) council, committee and/or chief officer role responsible for overseeing DEIA efforts across state agencies.

In addition, some states have committed to adding an anti-racist multicultural lens to their everyday work. This involves hiring equity experts to train leadership and staff and to advise on internal and external policy changes. It also includes revising data collection processes to expand collection options for race, ethnicity and gender. This data approach will more accurately reflect how people think of themselves while still allowing the agency to report data as the federal government requires.

Some jurisdictions are also creating Equity Data Portals to track state efforts on closing equity gaps. There is an emphasis in the field on recognizing the importance of poverty reduction in ensuring equity and the intersection of inequality and oppression in poverty. Reducing administrative barriers in programs such as TANF is one tool in this work. To effectively address structural racism, states have determined that it is crucial to expand their decision-making process to include individuals with lived experience and those impacted by their programs.

Recognizing the importance of racial equity to all ACF programs, we urge those within the human services field to consider the following actions toward achieving equity:

- Review and revise policies using an equity assessment processes and tool. Formal operational structures operating out of or reporting directly to the executive leader's office, such as task forces or committees, can greatly assist efforts to assess how agency policies affect disproportionality and disparities and to enact system changes. These structures can include other institutions and should center on individuals with lived experience.
- Create and promote statewide policy to address systemic issues and meet the needs of children and families of diverse racial and ethnic backgrounds.
- Identify contract and procurement opportunities that contain barriers to full and equitable participation. At a minimum, ensure these opportunities are promoted and communicated to providers of goods and services owned or operated by members of diverse racial and ethnic backgrounds.
- Establish a diverse and culturally competent workforce that acknowledges the importance of culture, has the capacity for cultural self-assessment, recognizes the dynamics resulting from cultural differences, strives for the expansion of cultural knowledge, and adapts services to meet culturally unique needs (Cross et al. 1989).

## V. CONCLUSION

ACF is committed to the Biden-Harris Administration's goal of advancing equity. To realize this goal, ACF is examining both its internal and external policies, operations, and relationships. We are consulting with our internal and external partners, focusing especially on those with lived experience because they are the true experts on our programs and processes. ACF will engage its external partners through ongoing two-way communication designed to solicit feedback and information about promising national, tribal, state, territorial and local plans, policies, practices, and activities. At ACF, we want to elevate and promote the work and accomplishments of federal, tribal, state, territorial, and local government and non-government partners.

ACF is unwavering in its dedication to making racial equity a central part of how we operate and deliver on our mission. Our goals are clear: to build a more just and equitable nation with systems that treat everyone with fairness and to provide everyone with the opportunity to reach their full potential. We are looking forward to our continued partnership and hearing about the work already done, accomplishments, challenges, and plans from the field.

Please direct your comments to [Equity@acf.hhs.gov](mailto:Equity@acf.hhs.gov). We look forward to working with you and with the people we serve to achieve these important goals.

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### ATTACHMENTS:

Attachment A - Definitions

Attachment B - References

Attachment C - Selected Resources in Support of Racial Equity