

Race and Social Equity

A Nervous Area of Government

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Chapter 8

Assessing Racial Equity in Government

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8 ASSESSING RACIAL EQUITY IN GOVERNMENT

*In order to get beyond racism, we must first take account of race.
There is no other way.*

—Harry A. Blackmun (1978)
(University of California v. Bakke)

Assessing the performance management and accountability dimensions of racial equity is central in the delivery of public services. It provides a direct and systematic examination of both processes and outcomes related to agency practice, policies, and behavior. It also promotes transparency in the impacts and consequences of government action. Examining the role of performance management and accountability relative to racial equity fosters an examination of advantaged and disadvantaged clients, structural causes of inequities, and ways of reducing racial disparities in publicly provided services.

Ideally, accountability in government offers the promise of democracy, justice, ethical behavior, and performance (Dubnick 2005). Each of these outcomes is particularly important with regard to assessing racial equity. Democracy is fostered through transparency and openness in agency behavior (O'Donnell 1998; Schedler, Diamond, and Plattner 1999). Justice is advanced through impartiality, objectivity, and protection from abuse of power (Ambos 2000; Elster 2004). Ethical behavior is promoted through oversight of the behavior of public servants (Dubnick 2005; Morgan and Reynolds 1997), and improved performance is cultivated through an increased emphasis on the effectiveness and efficiency of government service (Berman and West 1995; Hatry and Fisk 1971; Ridley and Simon 1943; Wholey 1983).

While the *Es* of effectiveness and efficiency are nearly synonymous with performance management, the *E* of equity is largely missing from assessments of performance management or, at best, receives far less attention than its counterparts. As Frederickson states, “In running the government the administrator’s job was to be efficient (getting the most service for available dollars) or economical (providing an agreed-upon level of services for the fewest possible dollars). It should be no surprise, therefore, that issues of equity and injustice were not central to public servants or to public administration theorists” (1990, 228).

The initial reasoning went this way: To say that a service may be well managed and that a service may be efficient and economical, still begs these questions. Well managed for whom? Efficient for whom? Economical for whom? We have generally assumed in public administration a convenient oneness with the public. We have not focused our attention or concern to the issue of variations in social and economic conditions. It is of great convenience, both theoretically and practically, to assume that citizen A is the same as citizen B and that they both receive public services in equal measure. This assumption may be convenient, but it is obviously both illogical and empirically inaccurate. (Frederickson 1990, 228)

Often equity is framed as a compromiser of efficiency. As Myers notes, “What is evident in our discipline, however, is the tension between the equity and efficiency criteria and the inherent trade-offs between the two” (2002, 170). Similarly, Patton and Sawicki contend, “In many instances programs that prove to be very efficient also prove to be very inequitable. The two criteria are seldom both maximized in the same program” (1993, 204). More recently, however, return-on-investment studies suggest there are significant economic costs of social inequity to society (Norman-Major and Wooldridge 2011). For example, Aaron and Temple (2007) performed a social return-on-investment study of youth-intervention programs in Minnesota. A primary finding was that intervention programs aimed at “at risk” youth can produce returns of up to \$14 for every state dollar invested, realizing reductions in court costs, school dropout rates, adult crime prosecution, and expenditures on public assistance.

Racial Equity Analysis

Race analysis is defined as “the systematic application of tools of historical and cultural analysis to understand the social and economic circumstances facing blacks and other racial minority groups” (Myers 2002, 170). Modern racial equity analysis was pioneered by W. E. B. Du Bois (1899) in his seminal work, *The Philadelphia Negro*. Based on an in-depth sociological analysis of Negro life in Philadelphia’s Seventh Ward, the then-largest concentrated area of African Americans, Du Bois identified and analyzed structural factors that provided a grounding frame of black life. As Bobo comments,

He [Du Bois] identified six specific types of effects of prejudice: 1) restriction of blacks to menial work roles; 2) vulnerability to displacement due to competition from native whites or white immigrants; 3) resentment of black advancement and initiative; 4) vulnerability to financial exploitation;

5) inability to secure quality education for children or to shelter them from societal prejudice and discrimination; and 6) a wide array of discourteous and insulting treatment in “social intercourse.” (Bobo 2000, 191)

Building upon this work, with a more direct focus on government, Blauner (1972) found that racism had an independent institutional base that did not require prejudice in order to demonstrate effectiveness.

The processes that maintain domination—control of whites over non-whites—are built into the major social institutions. These institutions either exclude or restrict the participation of racial groups by procedures that have become conventional, *part of the bureaucratic system of rules and regulations*. Thus there is little need for prejudice as a motivating force. (Blauner 1972, 9–10, emphasis added)

An important foundation of racial equity analysis is previous and ongoing identification of illegal discrimination based on race. “Legally defined, disparate treatment racial discrimination occurs when an individual is treated less favorably—for example, is not hired for a job—because of his or her race. Disparate impact racial discrimination occurs if a behavior or practice that does not involve race directly has an adverse impact on members of a disadvantaged racial group without a sufficiently compelling reason” (National Research Council 2004, 40–41).

For example, in the area of U.S. education policy, “equity audits of school districts have been conducted by school districts (either voluntarily or under pressure by civic activists or ordered by the U.S. Department of Education Office of Civil Rights) as a way of determining the degree of compliance with a number of civil rights statutes that prohibit discrimination in education programs and activities receiving federal funding (Skrla et al. 2004, 138).

While considerable work remains in aggressively prosecuting illegal discrimination, there are many legislative and administrative actions that are not legally prohibited.

Government actions fall under a somewhat different set of legal rules. . . . Specifically, although the equal protection clause prohibits disparate treatment discrimination that fails to have the most compelling societal justification, the Constitution prohibits only intentional discrimination; evidence of disparate impact alone will not establish a violation. Thus, the Constitution does not restrict a government from engaging in acts that harm disadvantaged racial groups unless the harm is caused intentionally. Moreover, knowing that a certain practice will cause harm is not enough

to render it an intentional act of discrimination barred by the equal protection clause. As the court has emphasized, a government is not prohibited from acting in spite of harm to members of disadvantaged racial groups; it is only banned from causing harm because of race. (National Research Council 2004, 52–53)

One important area, for example, is cumulative discriminatory effects.

Discrimination by real estate agents may result in housing segregation, which in turn affects educational quality (because of local tax financing of the schools) and long-term educational and labor market outcomes. Although discriminating real estate agents can be found liable for housing market discrimination, there is no legal mechanism to allocate blame for educational or labor market differences that such discrimination might induce. (National Research Council 2004, 41–42)

Assessing Racial Equity in Government

Fortunately, across multiple areas, government action is not guided by the narrow, minimalistic standard of avoiding illegal behavior, but by providing high-quality service to the public it serves. The same standard for excellence is instructive in analyzing government performance in providing services that are racially equitable. Government agencies should be motivated to analyze the racial equity dimensions of their services from an intrinsic goal to demonstrate high performance and accountability. Government agencies routinely engage in strategic planning, budget forecasting, and performance management practices designed to offer high-quality public service. Agencies monitor and strive to improve their performance in the areas of pothole repairs, snow removal, and the provision of online services, not because of legal requirements but because citizens and residents expect high-quality services. Racial equity in the provision of government services is driven not only by legal considerations, but by an organizational desire to employ fair practices in governmental performance.

Table 8.1 offers guiding criteria for defining best practices. As Keehley et al. suggest, “A best practice should address an activity that is resource intensive and has a significant impact on external customers” (1997, 26). In general, best practices are successful over time, innovative, yield recognized positive outcomes, are repeatable, have local importance, and are not linked to unique demographics.

Identifying a “best practice” relative to racial equity is preceded by an examination of evidence. Regardless of the specific quantitative or qualitative

Table 8.1

Best Practices Criteria

1. *Successful over time.* A best practice must have a proven track record.
2. *Quantifiable results.* The success of a best practice must be quantifiable.
3. *Innovative.* A program or practice should be recognized by its peers as being creative or innovative.
4. *Recognized positive outcome.* If quantifiable results are limited, a best practice may be recognized through other positive indicators.
5. *Repeatable.* A best practice should be replicable with modifications. It should establish a clear roadmap, describing how the practice evolved and what benefits are likely to accrue to others who adopt the practice.
6. *Has local importance.* Best practices are salient to the organization searching for improvement. The topic, program, process, or issue does not need to be identical to the importing organization, however.
7. *Not linked to unique demographics.* A best practice may have evolved as a result of unique demographics, but it should be transferable, with modifications, to organizations where those demographics do not necessarily exist.

Source: Keehley et al. 1997.

techniques employed, racial equity analysis generally aligns within one or more of the four broad approaches used to measure social equity: procedural fairness (due process), access (distributional), quality (process), and outcomes.

Procedural fairness involves the examination of problems or issues of procedural rights (due process), treatment in a procedural sense (equal protection), and the application of eligibility criteria (equal rights) for existing policies and programs. . . . Practices such as failure to provide due process before relocating low-income families as part of an urban renewal project, using racial profiling to identify suspects, or unfairly denying benefits to a person who meets eligibility criteria all raise obvious equity issues.

Access—distributional equity—involves a review of current policies, services, and practices to determine the level of access to services/benefits and analysis of reasons for unequal access. . . . Equity can be examined empirically—do all persons receive the same service and the same quality of service (as opposed to the procedural question of whether all are treated the same according to distributional standards in an existing program or service)—or normatively—should there be a policy commitment to providing the same level of service to all?

Quality—process equity—involves a review of the level of consistency in the quality of existing services delivered to groups and individuals. . . . For example, is garbage pickup the same in quality, extent of spillage, or missed cans in all neighborhoods? Do children in

inner-city schools have teachers with the same qualifications as those in suburban schools?

Outcomes involve an examination of whether policies and programs have the same impact on all groups and individuals served. Regardless of the approach to distribution and the consistency of quality, there is not necessarily a commitment to an equal level of accomplishment or outcomes. . . . Equal results equity might conceivably require that resources be allocated until the *same results* are achieved . . . a critical issue in consideration of equity at this level is how much inequality is acceptable and to what extent government can and should intervene to reduce the inequality in results. (Johnson and Svava 2011, 20–22)

Table 8.2 provides a sample social equity template that aligns with the areas noted above.

Such templates identify guiding questions for analysis. For example, in assessing procedural fairness, an appropriate guiding question relative to personnel actions is “Are processes for career development, advancement, awards, and recognition equitable?” For access equity, an example guiding question is, “Do budget allocations reflect a commitment to fair results among all stakeholders?” For quality equity, “Is the level, frequency, duration, etc. of service appropriate for specific stakeholders?” And for outcome equity, “Does the organization take action to improve disparities?”

Racial Equity Impact Assessments

While racial equity analysis is contained within the larger rubric of social equity analysis, it is useful for federal, state, and local governments to provide an assessment specific to race. “A Racial Equity Impact Assessment (REIA) is a systematic examination of how different racial and ethnic groups will likely be affected by a proposed action or decision” (Keleher 2009). Table 8.3 is a sample Racial Equity Impact Assessment Guide for Economic Policies and Public Budgets that provides questions specific to race that governmental agencies and policymakers can use to analyze current problems, develop proposed changes, or analyze current proposals.

Governmental agencies can then develop worksheets for specific racial equity impact analysis to examine the effect of proposed programs. In order to promote racial equity in government services, these tools are most appropriately utilized *prior* to program implementation. Exhibit 8.1 provides an example worksheet from the Streetlight Relamping Program within Seattle City Light. The worksheet requires agencies to answer ten standard questions regarding racial impacts of their proposed Streetlight Relamping program.

Table 8.2

Social Equity Analysis Template

Dimension	Guiding Questions for Analysis and Associated Outcome
Procedural fairness (due process)	<ul style="list-style-type: none"> • Does the organization employ fair and equitable processes to acquire a diverse, highly skilled workforce? • Are processes for career development, advancement, awards, and recognition equitable? • Are there processes to ensure appropriate information sharing among internal and external partners? • Are goals for contracting with minority- and women-owned businesses being supported and met?
<i>Outcome</i>	<i>Ensures equal protection and due process in personnel actions and business and operational dealings.</i>
Access (distributional equity)	<ul style="list-style-type: none"> • Do budget allocations reflect a commitment to fair results among all stakeholders? • Does the organization examine its outcomes in a manner that would permit it to identify inequities? • Are targeted interventions and other corrective actions taken to correct identified inequities? • Does the organization employ a culturally competent workforce capable of delivering services in a multicultural manner?
<i>Outcome</i>	<i>Ensures that appropriate allocations of resources are made so that fair results are realized by all stakeholders.</i>
Quality (process equity)	<ul style="list-style-type: none"> • Is the quality of service comparable for all stakeholders? • Is the level, frequency, duration, etc. of service appropriate for specific stakeholders? • Does the organization gather and analyze data, conduct periodic reviews, examine service delivery metrics, and so forth to identify service delivery deficiencies? • Does the organization undertake reviews and evaluations to determine whether its processes have a disparate or adverse impact upon a group of stakeholders? • Does the organization take action to address identified deficiencies and/or disparate or adverse impact?
<i>Outcome</i>	<i>Ensures consistent quality of service to all stakeholders.</i>
Outcome	<ul style="list-style-type: none"> • Does the organization collect and analyze data that would permit it to identify disproportionate results? • Does the organization examine causes of identified disparities? • Does the organization take action to improve such disparities?
<i>Outcome</i>	<i>Ensures the absence of disparities in processes, equal access, and procedural activities.</i>

Source: Johnson and Svava 2011.

Table 8.3

Racial Equity Impact Assessment Guide for Economic Policies and Public Budgets

Stage	Questions for Consideration
1. Analyzing current problems	<p>A. What are the <i>adverse effects</i> that different disadvantaged racialized communities experience under current conditions, policies, practices, and expenditures?</p> <p>B. What are the <i>causes or contributing factors</i> (e.g., unfair policies and practices, inequitable or insufficient funding formulas) that produce or perpetuate the inequities?</p> <p>C. What <i>data or evidence</i> is available or can be collected to demonstrate the racial inequities, adverse effects, contributing causes, trends, and current needs?</p>
2. Developing and advancing proposed changes	<p>A. What steps can ensure <i>public input and participation</i> by the most disadvantaged racial communities and stakeholders in developing proposed policies and budgets?</p> <p>B. What <i>new policies, programs, funding streams</i> are needed to address the needs and inequities that different racialized communities face?</p> <p>C. What <i>changes in existing policies, programs, budgets</i> would reduce racial inequities?</p> <p>D. What <i>new opportunities</i> can be created to enhance equity, inclusion, and unity across different racial/ethnic groups?</p> <p>E. What specific equitable <i>outcomes</i> will this achieve, and what are the success indicators?</p> <p>F. How can these proposed changes be <i>effectively designed</i> in such a way to make them most viable, enforceable, and sustainable?</p>
3. Analyzing current proposals	<p>A. Will the proposal <i>reduce, limit, or eliminate programs</i> that are vital to or disproportionately needed by particular disadvantaged racial/ethnic communities?</p> <p>B. Will the proposal <i>increase, expand, or create programs</i> that are vital to or disproportionately needed by particular disadvantaged racial/ethnic communities?</p> <p>C. Will the proposal <i>miss or create opportunities</i> to benefit and unify people across different racial/ethnic communities?</p> <p>D. Will there be enough money allocated to address real racial inequities <i>with fair and sustainable revenue streams</i>?</p> <p>E. Will there be <i>adequate provisions to ensure success and fairness</i>, including sufficient public participation by stakeholders in development, implementation, and evaluation?</p> <p>F. What <i>modifications</i> in the proposal are needed to maximize racial equity and inclusion?</p>

Source: Keleher 2009.

Exhibit 8.1

Racial Equity Impact Analysis Worksheet**1. Department and project title**

Streetlight Relamping Program, Seattle City Light

2. Briefly describe the proposed action and the desired results.

Seattle City Light is implementing a group relamping program for streetlights. The proposal outlines the steps SCL wants to take to engage a contractor to begin replacing 21,000 street lights. Then the Utility will begin a rotating program to replace luminaries in Seattle and our franchise cities. At present, the Utility replaces streetlight bulbs as it becomes aware of outages from customers and other spotters. This practice is more expensive than group relamping, and customers frequently have long periods before the streetlight can be fixed.

3. Who are the racial/ethnic groups affected by this program, policy, or practice? How will each group be affected? What are the racial disparities related to this project?

All racial groups residing in our service area will be affected. Those living in areas with higher crime rates presumably will be safer with more illumination. The original plan was to have two sets of contractor crews work north and south from the Utility's midway point, Denny Way. In response to the RSJ [Race and Social Justice] analysis, the Utility decided to work from the southernmost line of the service area and relamp moving north from there. This way, more low-income and immigrant communities would be served first. The relamping program is intended to provide greater reliability in streetlight operations than the current process.

4. How does the proposed action expand opportunity and access for individuals (including immigrants and refugees)?

There are large immigrant populations in the southern part of the service area. Currently, City Light relies heavily on customers to report lights out. Immigrants who do not speak English fluently and may not be knowledgeable about City Services are less likely to phone in outage reports.

5. How does the proposed action promote racially inclusive collaboration and civic engagement? Is there community support for or opposition to the proposal? Why?

The project manager went to several community meetings ahead of time to explain the program. There were written messages translated into the seven most common languages used in the district.

6. How does the proposed action [e]ffect systemic change (address institutional racism)?

(continued)

Exhibit 8.1 (*continued*)

Traditionally, City Light began system and service improvements in the north part of the service area. These residents are generally white and more financially advantaged. This method of rolling out the project will bring improvements first to communities of color.

7. How does the proposed action educate on racial issues?

Mainly the learning has been internal to City Light by making the project managers and engineers more aware that the decisions they make can have consequences to low-income and racially diverse communities. One hopeful outcome may be developing better trust and expectations within communities of color.

8. How does the proposed action support workforce equity and/or contracting equity?

City Light will contract out for group streetlight repair work; we will be looking at HUBS. Contractor employees will work for prevailing wages.

9. How does this action help to achieve greater racial equity? Describe the resources, timelines, and monitoring that will help ensure success.

The contractor's work will be inspected by a City Light resident engineer. We will use those reports to monitor progress and quality of service.

10. Are there any unintended consequences on racial equity? Are there strategies to mitigate any negative impacts?

None expected.

Source: Race and Social Justice Initiative 2010.

This worksheet captures subtle aspects of street lighting. For example, the proposal discusses the impact of customers' language skills in phoning in outage reports under the current system. It also addresses the association between lighting and crime. Additionally, the response to question six discusses the City of Seattle's previous record in providing system and service improvements, which historically began such improvements in the north part of the service area, largely comprising a higher-income and white population. The proposed lighting program will alter this historical service sequence to improve the City of Seattle's service to communities of color.

Legislative Racial Equity Assessments

The utilization of racial equity assessments is extending beyond use at the agency level. In April 2007, the state of Iowa passed the nation's first minority

Exhibit 8.2

**Minority Impact Statement Legislation,
Iowa Code § 2.56 (2009)**

1. Prior to debate on the floor of a chamber of the general assembly, a correctional impact statement shall be attached to any bill, joint resolution, or amendment which proposes a change in the law which creates a public offense, significantly changes an existing public offense or the penalty for an existing offense, or changes existing sentencing, parole, or probation procedures. The statement shall include information concerning the estimated number of criminal cases per year that the legislation will impact, the fiscal impact of confining persons pursuant to the legislation, the impact of the legislation on minorities, the impact of the legislation upon existing correctional institutions, community-based correctional facilities and services, and jails, the likelihood that the legislation may create a need for additional prison capacity, and other relevant matters. The statement shall be factual and shall, if possible, provide a reasonable estimate of both the immediate effect and the long-range impact upon prison capacity.
2.
 - a. When a committee of the general assembly reports a bill, joint resolution, or amendment to the floor, the committee shall state in the report whether a correctional impact statement is or is not required.
 - b. The legislative services agency shall review all bills and joint resolutions placed on the calendar of either chamber of the general assembly, as well as amendments filed to bills or joint resolutions on the calendar, to determine whether a correctional impact statement is required.
 - c. A member of the general assembly may request the preparation of a correctional impact statement by submitting a request to the legislative services agency.
3. The legislative services agency shall cause to be prepared a correctional impact statement within a reasonable time after receiving a request or determining that a proposal is subject to this section. All correctional impact statements approved by the legislative services agency shall be transmitted immediately to either the chief clerk of the house or the secretary of the senate, after notifying the sponsor of the legislation that the statement has been prepared for publication. The chief clerk of the house or the secretary of the senate shall attach the statement to the bill, joint resolution, or amendment affected as soon as it is available.
4. The legislative services agency may request the cooperation of any state department or agency or political subdivision in preparing a correctional impact statement.

(continued)

Exhibit 8.2 (*continued*)

5. The legislative services agency, in cooperation with the division of criminal and juvenile justice planning of the department of human rights, shall develop a protocol for analyzing the impact of the legislation on minorities.
6. A revised correctional impact statement shall be prepared if the correctional impact has been changed by the adoption of an amendment, and may be requested by a member of the general assembly or be prepared upon a determination made by the legislative services agency. However, a request for a revised correctional impact statement shall not delay action on the bill, joint resolution, or amendment unless so ordered by the presiding officer of the chamber.

Source: State of Iowa 2008.

impact legislation (Exhibit 8.2). The passage of Iowa's legislation occurred following a Sentencing Project report that found that Iowa incarcerates African Americans compared to Caucasians at a ratio of 13 to 1. The national average is 5.6 to 1. This places Iowa in the top spot for the highest ratio of black-to-white incarcerations of any state in the nation (Mauer and King 2007). According to Iowa's governor, Chet Culver, "while 2% of Iowa's population is African-American, 24% of Iowa's prison population is African-American" (Office of the Governor of Iowa 2008). Targeted at reducing racial disparities in the Criminal Justice system, "Iowa plans to utilize minority impact statements when new public offenses are created, when penalties for existing public offenses are changed, and when changes are made to sentencing, parole, or probation procedures" (Rossi 2010, 866).

After a legislative committee makes a determination that new correctional legislation may have an impact on a minority population, an impact statement will be prepared by one of the agencies or commissions previously mentioned. After an impact statement is prepared, and before the proposed legislation is voted on, the impact statement is sent to the legislative body for review. "Committee consideration of . . . [the racial impact statement] should be guided by two questions. First, do the crime control benefits of such a policy outweigh the consequences of heightened racial disparity?" That is, would an increase in racial disparity resulting from passage of the proposed legislation seem justified if looked at from a public safety viewpoint? "[S]econd, are there alternative policy choices that could address the problem at hand without such negative [racially disparate] effects? By

answering these two questions, legislatures would direct sentencing policy more specifically toward the area of concern and would almost inevitably reduce the racial disparities” (Rossi 2010, 864-65).

Evaluating Racial Equity Performance

Equity evaluation is not calculated by a universal mathematic formula. Rather, it is similar to program evaluation or agency performance evaluation. The rating system offers a differentiation among inequitable policies and practices, ranging from an overall assessment of “inequitable” to “minimally inequitable.” As Table 8.4 depicts, specific or general agency policies and practices should be evaluated against the four primary measures of equity: procedural fairness, access, quality, and outcome. Each dimension is assessed to derive an overall equity evaluation. If the evaluation results yield an assessment of “excellent” on each of the four dimensions of equity, then the agency policy or practice is “equitable.” If the evaluation results yield an assessment of at least “good” on each of the four dimensions of equity, then the agency policy or practice is “minimally inequitable.” If the evaluation results yield an assessment of at least “fair” on each of the four dimensions of equity, then the agency policy or practice is “moderately inequitable.” If the evaluation results yield an assessment below fair on any one of the four dimensions of equity, then the agency policy or practice is “inequitable.” Importantly, the overall equity assessment is based upon performance on *each* of the four dimensions of equity. For example, if a specific policy or practice is rated “excellent” on one equity dimension, such as procedural fairness, but rated “fair” on another equity dimension, such as quality, the overall evaluation is “moderately inequitable.”

Similar to program evaluation, equity assessments may be determined by using a variety of quantitative and qualitative tools, such as regression analysis, residual differences analysis, hazard models, audit studies, geographic information systems (GIS) analysis, content analysis, and ethnography. Performing racial equity analysis alone is not predicated by a specific technique, but rather a thorough assessment along multiple dimensions as methodologically appropriate based upon the specific policy or practice.

Conclusion

Government agencies that deliver public services in a democratic society should value and measure the equity of their work. Assessing equity within government is as important as assessing effectiveness and efficiency. To promote such appraisals, the use of racial equity assessment tools is increasing within government. Governments are providing internal monitoring and

Table 8.4

Racial Equity Ratings

Ratings	Criteria
Equitable	Excellent performance on each of the four equity dimensions (procedural, access, quality, and outcome)
Minimally inequitable	At least good performance on each of the four equity dimensions (procedural, access, quality, and outcome)
Moderately inequitable	At least fair performance on each of the four equity dimensions (procedural, access, quality, and outcome)
Inequitable	Below fair performance on one or more equity dimensions (procedural, access, quality, and outcome)

accountability of their racial equity performance, rather than relying solely upon external academic researchers and policy organizations to fill this gap. It is particularly important to assess racial equity impacts *prior* to the implementation of legislation or programs, rather than just following implementation. Similar to projecting the fiscal impact of a proposed policy or program, projecting the racial equity impact of a particular action is also critical.

Racial equity toolkits are designed to detect subtle aspects of racial inequities, which are more aligned with contemporary racial inequity practices. While blatant racism and discrimination still exist, on the whole they have decreased over time. Monitoring illegal discrimination remains important, but additional examination of more nuanced racial inequities is important as well. Doing only the former fails to systematically consider the nuances of racial inequities that permeate twenty-first-century governmental agencies.

Evaluating agency performance in terms of racial equity is also a critical task. Routine racial equity analysis of agency performance can be effective in assessing policies and practices. While racial equity analysis in government is important, such systematic evaluation is also relatively new, unless it is legally required. Public administrators will need additional training in developing and conducting racial equity impact assessments. This suggests that the fields of public administration and public policy will need to better train public affairs professionals along these skill set dimensions. However, public administration programs must also examine areas of nervousness within their own organizational structures.

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