

Draft CARB Racial Equity Framework and Model for Change

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Introduction

On September 4, 2020, a group of Black California Air Resources Board (CARB) employees shared "[A Letter and Action Plan for Racial Change at the California Air Resources Board](#)". The letter calls on CARB to implement a list of actions to shift the culture at CARB from one of white privilege to an actively anti-racist and more inclusive culture that values and affirms Black lives. The authors acknowledge challenges faced by non-Black people of color (POC), and note that the recommended actions also should be applied to all non-Black POC at CARB. The letter noted CARB's then-ongoing effort to launch the Diversity and Racial Equity Task Force (DaRE) and provided

"We hope our words will encourage deep reflection, growth, and meaningful transformation concerning the culture of white privilege in our workplace and our country."

CARB Black Employees' Letter and Action Plan for Racial Change at the California Air Resources Board.

recommendations to guide the Task Force. The letter also noted that CARB and other government agencies are increasingly using terms like “equity,” “diversity,” and “environmental justice,” without recognizing the importance of having a workforce that reflects these principles.

In addition to the letter mentioned above, in 2020, all California Environmental Protection Agency (CalEPA) Boards, Departments, and Offices (BDOs) participated in a racial equity survey. This survey established a baseline for assessing the level of understanding of racial equity within the workforce. Key findings specific to CARB included:

- A high degree of commitment to and realization of the need to advance racial equity, but less agreement that progress has been made.
- A key difference emerged when responses were compared across race and ethnicity. For example, significantly more Black or African-American respondents strongly disagreed that leadership in their Division communicated the importance of addressing racial inequities and achieving racial equity.
- In general, non-supervisors were more inclined to indicate they disagreed or did not possess knowledge about activities undertaken to advance racial equity.

The letter from Black employees’ and the survey findings are only two of multiple experiences that have led CARB leadership recognizes the need to further commit to incorporating equity into CARB’s internal procedures, to ensure CARB can achieve its agency mission “to promote and protect public health, welfare, and ecological resources”.¹ Other experiences include the shared national experience of participating in or witnessing nationwide protests demanding justice for George Floyd’s murder by police in Minnesota in 2020, which in part led to the development of the Board’s Resolution 20-33 declaring the Board’s commitment to racial equity and social justice.

CARB’s mission to protect and promote the public health, welfare, and ecological resources applies to all Californians. Ensuring a continued consistent approach to improving equity in all forms—including racial equity—in CARB’s internal procedures is critical to ensure all staff teams continue to work in the same direction to achieve that mission.

CARB staff teams recognize and have worked hard to incorporate equity principles and considerations into specific programs during their development or implementation, such as the Office of Community Air Protection implementing Assembly Bill (AB) 617 (C. Garcia, Ch. 136, Stats. 2017), the Enforcement Division implementing community-focused enforcement efforts in emissions burdened communities, and the Sustainable Transportation and Communities Division developing the Advanced Clean Cars II rulemaking. It is essential that such efforts continue to reflect a shared vision to advance racial equity.

Purpose

This Racial Equity Framework (Framework) describes the conceptual framework and model of organizational change that serves as the foundation for CARB’s work to advance equity. It will guide the internal implementation of CARB’s racial equity efforts, including actions

¹ CARB’s Mission statement, available at [About | California Air Resources Board](#)

recommended in the Black Employees' letter, as well as other steps CARB will take to become an anti-racist organization.

This Framework will provide the many staff teams working on equity throughout CARB with a clear and consistent conceptual foundation to guide their work. The delineation of roles, responsibilities and reporting relationships, including across DaRE and the Offices of Environmental Justice and Racial Equity, reflect a coordinated support structure of support.

The framework is necessary in order to speak to the conscious avoidance of addressing forms of racial inequity as it may come up in CARB's work that reflect a cultural discomfort with talking about race and racism. While such discomfort is common, normalizing the use of a racial equity lens in our work is an essential part of the model of change further described in the Framework. Importantly, this Framework, and the future work that it will support, will be implemented in a manner consistent with all applicable federal and State laws relevant to protected characteristics and categories, including race, color, ethnicity, religion, sex, national origin, sexual orientation and gender identity.

To achieve these goals, this document describes three key elements to guide CARB's work:

- (1) Concepts to support a shared vocabulary and understanding of topics important to implementing racial equity efforts,
- (2) CARB's model for organizational change,
- (3) A Diversity Equity and Inclusion Communication Framework describing how staff teams will coordinate (Figure 1).

The Framework is an iterative document, and its elements will be updated over time to reflect lessons learned from our work to advance racial equity as it is used to guide internal implementation of specific equity-related efforts.

[What is the Framework and How Can We Use it?](#)

In this context, the Framework describes racial equity-related concepts and how they fit together. The Framework also describes a model of change common in organizational change efforts, but that has been customized to drive anti-racism efforts through the work of the Government Alliance on Race and Equity (GARE), a network of over 300 State and local jurisdictions including CARB.

This Racial Equity Framework should be used in two ways: 1) to support the development of racial equity action plans at the Division and CARB-wide level; and 2) to provide context for CARB's racial equity efforts. This Framework is meant to build a shared understanding of racial equity that will be incorporated into specific actions. The Office of Environmental Justice (OEJ) will work collaboratively with the Diversity and Racial Equity Taskforce (DaRE) and other leaders in the Executive Office and Divisions to develop and implement a racial equity action plan to operationalize racial equity. Divisions are also encouraged to develop their own Division-specific plans using this Framework as a reference.

Figure 3 on page 10 shows how these efforts will be coordinated through work with OEJ, DaRE, CARB Divisions, other CARB equity groups, and leaders and executives. The Framework also supports the curriculum, *Advancing Racial Equity at CalEPA*, a six-hour training on structural racism and racial equity tools.

OEJ is concurrently working to design a model of community engagement with a focus on equity. As described later in this document, equity is both a process and an outcome, and efforts to enhance our engagement practices with equity in mind are also necessary, but are outside the scope of this Framework. Once complete, the community engagement model will be included as a reference.

[Why Do We Need a Common Framework for Racial Equity?](#)

A racial equity framework that clearly articulates CARB's vision for racial equity and the differences between individual, institutional, and structural racism—as well as implicit and explicit —bias helps establish a shared understanding of these concepts. From the inception of our country, government at the local, regional, state, and federal level has played a role in the historic and current racial inequities. For this reason, a racial equity framework that clearly calls out government's role to become anti-racist is critical. Failing to communicate a common framework across the entire organization increases the likelihood that equity efforts will not reach their full potential. Sharing a common framework with sister agencies also helps us learn from and leverage each other's efforts. Each CalEPA BDO has established their own BDO-specific work groups or task forces with a focus on racial equity. Together, these sister agencies and the other California state and local agencies that are part of GARE represent opportunities for peer exchange and learning. CARB is not alone in this work.

[Why Racial Equity / Why Lead with Race?](#)

Race is complicated. It is a social construct, and yet many still think of it as biological. Something that is often ignored or forgotten is that race has been used as a tool to create hierarchy. Racial categories have evolved over time, and yet many think of race as static. Race is often “on the table,” and yet rarely discussed with shared understanding. Race, income, and wealth are closely connected in the United States. However, racial inequities are not just about income. **When we hold income constant, there are still large inequities based on race across multiple indicators for success, including education, jobs, incarceration, health, housing and the environment.** Racial equity means the end of disparities based on race, such that outcomes are improved for all.

For CARB, this means we work toward a future where race no longer predicts exposure to unhealthy air or disproportionate impacts from climate. We do not simply want to close the gap, but to ensure clean air for everyone. We know from an analysis of CalEnviroScreen state-wide scores that in the highest scoring census tracts—in the communities most impacted by and vulnerable to pollution--89% of the population are people of color, while in the least impacted census tracts, the population is 72% white. A narrower focus on air quality also reveals disparities on the basis of race and ethnicity. Racial-ethnic populations in

the United States are exposed to disproportionately high levels of ambient fine particulate air pollution (PM_{2.5}), the largest environmental cause of human mortality. A [recent study](#) shows that nearly all major categories of PM_{2.5} emissions—consistently across states, urban and rural areas, income levels, and exposure levels—contribute to the systemic PM_{2.5} exposure disparity experienced by people of color.

This approach leads with race, but is not exclusive to race. Addressing racial inequities prepares us to recognize and deal with inequities based on other forms of marginalization. This also requires an understanding of intersectionality—when inequities based on race and gender, gender and sexual orientation, etc. interact with each other. Religious discrimination, sexism and misogyny, discrimination against gender non-conforming and non-binary gender people, ableism, anti-multilingualism and other important areas of human identity all deserve our attention and defense. However, when we disaggregate data by race in each of these areas, we see that race serves as a force multiplier for who is significantly burdened by inequity in our community. The [CalEPA Practices to Advance Racial Equity in Workforce Planning resource guide](#) addresses recruitment, hiring, retention and promotion, which are all areas where we see inequities on the basis of race and gender.

What are the Foundations of the Framework?

The elements of CARB's racial equity framework derive from approaches used by the [Government Alliance on Race and Equity](#) (GARE) and [Equity in the Center](#). GARE is a national network of State and local governments working together to achieve racial equity and advance opportunities for all. CARB has been a member of GARE since 2018, and is a member of California's [Capitol Collaborative on Race and Equity](#). CCORE is a community of California State government entities learning about, planning for, and implementing activities that embed racial equity approaches into institutional culture, policies, and practices.

Equity in the Center is a nonprofit organization whose goal is to shift mindsets, practices, and systems within the social sector to increase racial equity. Equity in the Center is guided by a robust set of advisors, practitioners and leaders in the field, including representatives of GARE. CARB's DaRE Task Force has worked to apply the Equity in the Center approach towards an organizational self-assessment in order to provide a baseline of where CARB is as an organization and therefore define future goals consistent with being an anti-racist organization.

What is the Role of Government in Creating and Eliminating Racial Inequities?

The history of government and racism can be told in three phases. In the first phase, government was **initially explicit** in its racial oppression. Government passed and enforced laws that determined, based on race:

- Who could vote
- Who could be a citizen
- Who could own property
- Who was property

- Whose land was whose
- Where people could live
- Who could marry whom
- Whose military service would be honored, and whose would not

Because people came together in mass protest and in tactical coalitions to change the laws in our country, the 13th, 14th and 15th amendments to the U.S. Constitution ended slavery, freed enslaved people, recognized the right to equal protection under the laws of the U.S., and gave Black men and other men of color the right to vote, respectively.² The 19th amendment recognized the right of women, including Black women, to vote. However, state-sanctioned racism continued through the era of Jim Crow. It took the passage of the U.S. Civil Rights Act of 1964³ and the Voting Rights Act of 1965⁴, as well as key court cases such as *Brown v. Board of Education*⁵, to do away with Jim Crow state laws. But they did not do away with racism.

In the second phase, government racism became implicit. Race neutrality did not work and after making some progress, inequity was actually worse. To make progress in reducing racial inequity, it is necessary to address and acknowledge race as a factor in creating inequity.

In the third and current phase, efforts to change government from within at the local and state government level represent a movement across the United States. This change-making effort acknowledges structural racism in our system of government, and calls for anti-racist government.

This approach means that our work to advance racial equity is not just about a new initiative or program. We are about changing government from within. This means the work is a long-term commitment, as equity is both a process and an outcome. It also means we must focus both on our own growth as individuals, as well as work to ensure that our institutional culture is committed to anti-racism.

"If we are to disrupt our nation's deep and pervasive inequity in terms of opportunity and results, generate new possibilities for community ownership of government, and establish a new narrative for a truly inclusive democracy, *it is essential to transform government.*" ([GARE Resource Guide: Racial Equity, Getting to Results](#))

What do Key Terms in the Framework Mean?

Equality and Equity

These terms are sometimes used interchangeably, but in fact mean very different ideas. Equity is NOT the same as equality. Equity is about fairness, while equality is about sameness. Equity involves providing people with the appropriate resources and support, for their particular situation, to enable them to

² U.S. Const. amends. XIII, XIV, XV.

³ *Civil Rights Act of 1964* (Pub. L. 88-352) (Title VII), as amended, 42 U.S.C. §§ 2000e et seq.

⁴ Voting Rights Act of 1965, 52 U.S.C. §10101 et seq.

⁵ *Brown v. Board of Education* (1954) 347 U.S. 483.

experience similar opportunities and outcomes as other groups. Equality, on the other hand, involves giving everyone the exact same level of support or resources regardless of their situation. Equality only works if everyone starts from the same place and needs the same things.

Process and Outcomes

Equity is both a process and an outcome. A parallel notion to help illustrate this concept comes from California's definition of environmental justice, which was amended by statute in 2018 to include the phrase meaningful involvement. Under State law: "[E]nvironmental justice" means the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. (Gov. Code, § 65040.12, subd. (e).) This definition focuses both on procedural justice, including meaningful involvement and outcomes, as expressed by the goal of "fair treatment".

Racial Equity refers to the level of fairness and justice in the systems, processes, and policies of an organization, such that race would no longer be a factor in the assessment of merit, the distribution of opportunity or the benefits of regulation, i.e., clean air. Racial equity is achieved when race can no longer be used to predict life outcomes and outcomes for all groups are improved. When systems and structures are not working well, they are often not working well across the board. Many examples of strategies to advance racial equity benefit not only Black, people of color and Native Americans, but also all communities, including whites.

Levels of Racism

Individual Racism occurs at the individual or internal level, and includes negative feelings or beliefs (whether conscious or unconscious) based on race. Examples include prejudice—being predisposed to judgement on the basis of race, or xenophobia—fear of the "other." These feelings can be internalized, when people of color take in racist beliefs about their own race or ethnicity. At the level of the individual, these feelings can be explicit—we are conscious of them, or implicit—we are unaware of our preferences toward or against others on the basis of race, ethnicity or any other form of oppression.

Racism at the interpersonal level happens between people, such as through expressions of racial prejudice, hate and bigotry. Microaggressions can be a form of interpersonal racism.

Institutional Racism happens at the level of an organization—an institution, a workplace, or a sector, such as banking, education, health care, environmental protection, etc. Evidence of institutional racism can be found in policies, practices or decisions that result in discriminatory treatment or effects, even when those policies seem race-neutral or color-blind, meaning that they do not explicitly mention race.

Structural Racism is the cumulative total effect of all the forms of racism, amplified across our history and reinforced by social norms of white-dominant society. These levels of racism are interconnected and reinforcing. Police officers are not only acting as individuals, but are representing a powerful institution. When we interact with the public as representatives of CARB, we are not only seen as individuals, but also as representatives of our institutions.

A glossary of racial equity terms created by DaRE can be found [here](#); this glossary expands on the terms described in the Framework.

CARB's Model of Organizational Change

CARB will be deliberate and use approaches that are consistent specifically aligned with anti-racist organizations. Our vision should be the central driving force. In the six-part approach to institutional change recommended by GARE, there are three overarching elements: Normalize, Organize and Operationalize (Figure 1).

Six-Part Strategic Approach to Institutional Change

Normalize

- Use a racial equity framework
- Operate with urgency and accountability

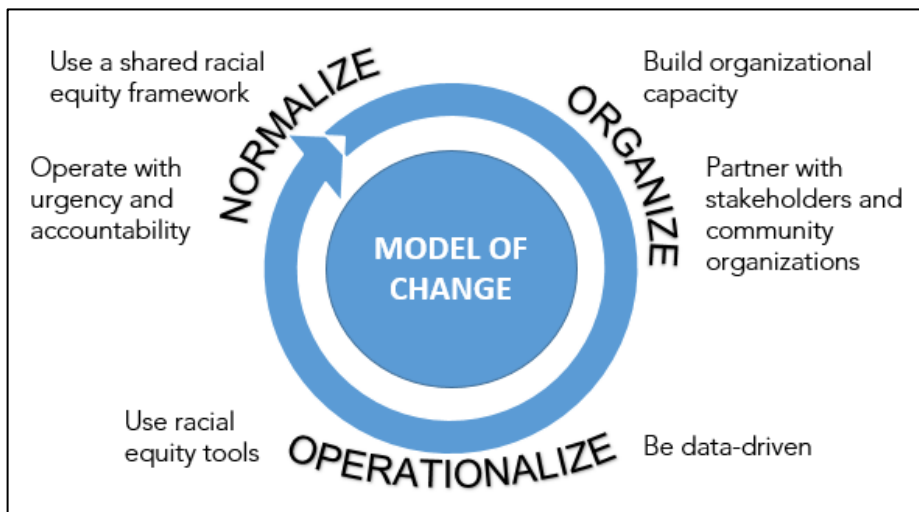
Organize

- Build organizational capacity
- Partner with other organizations and communities

Operationalize

- Implement racial equity tools
- Be data-driven

Figure 1, GARE Model of Organizational Change



The GARE Model of Change complements and reinforces another model in use at CARB, within DaRE and referenced in some of CARB's materials, known as the Race Equity Cycle (Figure 2) from Equity in the Center. Like the GARE Model, it also has three overarching elements, called: Awake, Woke, and Work. Elements of both models are described in detail below.

Figure 2, Equity in the Center's Race Equity Cycle



Normalizing / Awake

Normalizing racial equity means it is institutionally acceptable to explicitly identify race as a focus for our work in government, consistent with State and federal law. We do this by building a **shared understanding of a framework**. We must transition from an organization where race and racism are not acknowledged to one that uses racial equity as a lens for both internal and external operations. When we use racial equity as a lens, it means that we are incorporating race and ethnicity when analyzing problems, identifying solutions,

and defining progress.

"Awake," like normalizing, is the stage in which the organization focuses on people (workforce) to ensure that it is comprised of different backgrounds, with the primary goal of ensuring that the workforce reflects the diverse background, talents, and experiences of state residents.

The two key strategies that are part of normalizing are to **use a shared racial equity framework** and to **act with urgency and accountability**. The development of this iterative racial equity framework and its use in workforce training and to communicate a shared foundation for action plans is a response to this strategy.

We must also leverage the current moment by acting with urgency to prioritize lasting and meaningful change over superficial or "band-aid" approaches that treat equity as the priority of the day. Rather we must commit to equity as an organizational imperative—one that must be acknowledged, addressed and institutionalized in order to protect all the Californians we serve. While such change is hard and takes time, we have seen how quickly national crises can elevate the conversation. Our challenge is to leverage the current moment by **acting with urgency** to prioritize lasting and meaningful change over superficial or "band-aid" approaches that treat equity as the priority of the day. Rather we must commit to a path of organizational change and build in institutional accountability.

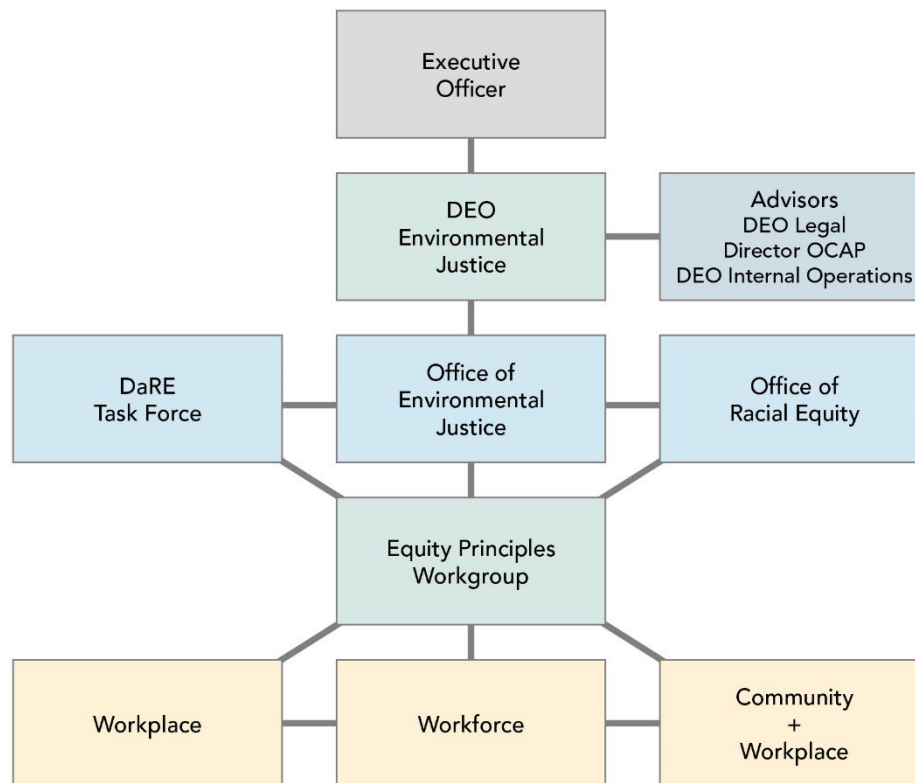
Organizing / Woke

At its core, organizing is about mobilizing for change and transformation. We do this in two ways: **building our own capacity** and **partnering with others**. Building our own capacity means we cannot solely rely on contractors, consultants or those with “environmental justice” in their job titles to do the work of racial equity. Rather, we must develop a commitment to the breadth (all functions) and depth (throughout hierarchy) of institutional transformation.

In some equity spaces, this is also called “Woke” – this moves us from representation to inclusion, because we all understand that just because we invite others to the table does not mean they are respected, valued or heard. In this space, we are looking to create a culture that requires an adaptive and transformational approach that impacts behaviors and mindsets, as well as practices, programs, and processes.

Organizing to advance equity must come from the bottom up and top down. It is also essential to identify key points of coordination and leadership within the organization. CARB has organized for racial equity by creating the DaRE Task Force and establishing an Office of Racial Equity (Figure 3). Executive Office leadership and the Division Chief Council coordinate across the organization to support this work. DaRE acts as a cross-organizational team that centers the work that is focused internally, while the OEJ and Racial Equity focus on our external work.

Figure 3, CARB's Organizational Capacity for Racial Equity



In 2021, CARB deepened our capacity to identify and address any structural racism through a Train-the-Trainer program. Seven CARB trainer candidates participated in a CalEPA-wide effort that stemmed from work begun in 2019 to refine the racial equity curriculum offered by GARE for CalEPA. Certified trainers can deliver a six-hour training course on structural racism, *Advancing Racial Equity at CalEPA*. CARB has six certified trainers, including four principal trainers that can train and certify future trainer candidates. Trainers not only provide training, but serve as in-house informal consultants to guide deeper change efforts throughout the organization, in coordination with DaRE and the Offices of Racial Equity and Environmental Justice. CARB's trainers are part of a network of twenty certified trainers throughout CalEPA. We also have strong partnerships across many other institutions and communities. We must further deepen these partnerships if we are to achieve racial equity.

Operationalize / Work

"Operationalize" is characterized by taking steps to deliberately assess our programs, policies and operations with a racial equity lens. By **using racial equity tools**, which are a series of questions, we build a track record of experience. Racial inequities are not random—and in all too many examples of structural racism, are a result of government actions, policies or programs. As such, they will not disappear without concerted and

deliberate action. It is important to emphasize that most approaches to anti-racism work, such as those in GARE and Equity in the Center, require this focus on our institutions to effect change. Work on an individual level to increase our understanding and awareness prepares us to critically examine our workplaces, cultures, policies, and practices. This is often where it may seem as if such an approach conflicts with loyalty to the institution. Clear leadership that acknowledges we can and must not only “do better” but be anti-racist can signal that this approach is not only sanctioned but required.

In the framework from Equity in the Center, operationalizing is called Work—organizations hold themselves accountable to address systemic racism and the root causes of inequities, both internally and externally.

In addition to being intentional, we must be **driven by the data**—both qualitative and quantitative. Measurements must take place at two levels—first, to measure the success of specific programmatic and policy changes, and second, to develop baselines, set goals, and measure progress towards goals—goals that should be deeply informed by community priorities, needs and values.

Public-facing equity-data focused tools developed by the CalEPA Racial Equity Team, in which CARB participates, include:

- An [interactive StoryMap](#), *Pollution and Prejudice*, that explores the history of redlining for California cities.
- The StoryMap contains the [CalEPA Redlining and Environmental Justice Tool](#), which demonstrates the association between historically redlined neighborhoods and present-day CalEnviroScreen (CES) cumulative impact scores. Also links to regulated facility information in the context of redlining and CES scores. Also see:
 - [Not Even Past](#) (University of Richmond’s Digital Scholarship Lab and the National Community Reinvestment Coalition) maps redlined cities and social vulnerability across the U.S.
 - [In U.S. Cities, the Health Effects of Past Housing Discrimination are Plain to See](#), News article by media outlet NPR.
- A [data visualization](#) tool to disaggregate workforce demographic data by Board, Division, or Office (BDO) and within BDO, in addition to classification, race, ethnicity and gender to better understand the demographics of the workforce.
- [State of California Workforce Data](#) - Data tables in machine readable structure about the demographics of state employees categorized by department, job title, race and gender. (California Open Data Portal).

Operationalizing racial equity also includes being able to **use racial equity tools** such as a racial equity lens, which is a set of questions grounded in civil rights disparate impacts assessment. Disparate impact assessment is addressed within Title VI of the Civil Rights Act of 1964, which ensures that programs accepting federal money are not administered in a way that discriminates on the basis of race, color or national origin (<https://www.justice.gov/crt/fcs/T6Manual7>). Using a racial equity lens means asking how our actions will benefit and potentially burden communities, including estimating impacts / benefits on the basis of race, ethnicity or other relevant categories. It means considering

alternatives, with a focus on which would do the most to address existing disparities and which might have unintended consequences. The questions that make up the racial equity lens include but are not limited to:

- Who will benefit from or be burdened by the proposal or program?
- What are the strategies for advancing racial equity or mitigating unintended consequences?
- How will you ensure accountability, communicate and evaluate results?

CARB has been taking on the challenge of developing such a protocol to guide key CARB decision-making using a racial equity lens. The work continues, and will include engagement with external equity leaders.

Summary of Progress to Date

While there is no perfect place to start, continuous movement (progress) is necessary. Below are some things that CARB has done and continues to do to inform its racial equity work.

Normalize/Awake

- Draft the CARB Racial Equity Framework
- Establish a shared vocabulary through DaRE's Racial Equity Glossary of Terms
- Establish a racial equity baseline for CARB (DaRE Awake-Woke-Work Document; CARB Racial Equity Employee Survey Summary of Findings)
- [Guidance for Racial Equity Conversations](#)
- 90-Day Challenge/Brown Bags/Speaker Series/Heritage Month Acknowledgments
- Prepare report to the Board on racial equity

Organize/Woke

- Launch DaRE
- Take part in 2020 Racial Equity Survey
- Launch multiple division-specific equity work groups
- Identify race equity champions at the Board and senior level
- Create Office of Racial Equity
- Certify in-house trainers on structural racism, and launch training delivery

Operationalize/Work

- Develop Interim Community Engagement Guidance
- Disaggregate available workforce data by race and ethnicity to identify areas of inequity (see links in resource section above)
- Launch [Diverse Hiring Panels memo/Redaction Project](#)
- Racial Equity Code of Conduct
- Draft the Racial Equity Assessment Lens

Moving Forward

This Framework, released for internal comment on March 2, 2022, is the first step in an iterative process to develop and implement CARB's model of organizational change to further incorporate equity. It is one of the next steps in implementing the Resolution, responding to the 2020 Letter from Black Employees, and coordinating ongoing equity efforts across CARB. As the Framework is implemented, the Office of Environmental Justice and the Executive Office working with the Divisions, will track lessons learned and update the Framework as needed to support the effective and meaningful advancement of racial equity throughout CARB.

References

GARE has developed a [Racial Equity Toolkit](#) which offers a simple set of questions that helps governments proactively eliminate racial inequities and operationalize racial equity. Equity in the Center has a publication entitled [Awake to Woke to Work](#) that provides insights, tactics, and best practices to shift organizational culture and operationalize equity.

These and other key references are listed below.

[Advancing Racial Equity and Transforming Government: A Resource Guide to Put Ideas into Action](#)

[GARE Resource Guide: Getting to Results](#)

[Awake to Work to Work: Building a Race Equity Culture](#)

[CARB Racial Equity Survey Findings, Final Report](#)

Legal resources include but are not limited to:

[U.S. Const., amends. XIII, XIV, XV.](#)

[U.S. Civil Rights Act of 1964, Titles VI and VII](#)

[Cal. Const., art. I, §§ 3, subd. \(b\)\(4\), 7, subd. \(a\)](#)

[Cal. Const., art. I, § 31](#)

[California Gov. Code, §§ 12900 et seq., 11135 et seq.](#)