Events of 2020 and 2021, including the COVID-19 pandemic and domestic unrest, highlight that long-standing systemic inequities exist in our nation, with underrepresented populations continuing to face disparities across health, economic, criminal justice, and education outcomes.

Addressing such systemic disparities requires an understanding of their deeply rooted causes, and data can serve as the impartial key to unlocking this understanding. Leaders at all levels of government are seeking to leverage data to analyze, model, and objectively measure equity outcomes to all policy decisions that may directly or indirectly affect underserved communities. To enable this data-driven decision making, our nation’s leaders and those who support them must address two ongoing challenges: the lack of data granularity essential for informing equity-related decisions, as well as barriers to using existing data to better understand impacts of policy on underserved communities.

Data Drives Equitable Policy and Actionable Decisions

The current opportunity to address long-standing inequities in society has created an urgent need to assess all federal policies, programs, and practices through an equity lens. Data empowers policymakers to ensure “the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment.” With a data-driven approach, policymakers can make decisions and design programs and services to meet individual needs uniquely and equitably.

The importance of data-driven policy decisions is not new. Legislators and policymakers at the federal level are implementing the requirements of the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence-Based Policymaking Act), which is intended to improve outcomes through the use of evidence and data to generate policies and inform federal programs. If the right information and data is collected, policies and program decisions can be made to create equitable access to wealth, opportunities, and privileges.

“The term ‘equity’ means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as 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.”

– Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government
Using Established Analytical Methods to Address Inequities

Policymakers across government are attempting to address root causes of systemic inequities through a proven scientific approach for decisive analytics commonly used to understand and address difficult questions and problems facing our nation (see Figure 1 below). Each step of this analytical framework is informed by data, and the methodology effectively highlights data gaps that need to be filled before the root causes of inequities can be understood. It is only through understanding these root causes that policymakers can create effective solutions.

Challenges with Data Collection and Management:
Limitations in equity-focused data collection and management inhibit the rigorous application of analytical frameworks. Across both federal and non-federal organizations—and spanning fields like economics, transportation, education, and healthcare—data is frequently not collected at levels of detail and granularity necessary to evaluate equity outcomes. or missing altogether. These inconsistencies exist because data related to these factors is often not collected, is unreliable, or is incomplete. When missing data pertains to underserved groups, the needs of those groups remain unaddressed in policy design or evaluation.

Studies illustrate the issues associated with the lack of sub-categorical, detailed data collection, such as in the nation’s criminal justice and health systems, where significant ethnic disparities are observed. For example, a recent report from the Urban Institute outlines that 40 states reported race (e.g., “White,” “Black,” “other”) in their arrest records, with only 15 states reporting ethnicity. According to the report, states that do not include ethnicity likely label most of their Latino prison population as “White.” This misleading labeling artificially augments the number of “White” people in prison, thereby masking the criminal justice system’s White/Black disparity.

In the health field, many attributes directly associated with maternal mortality outcomes within marginalized groups are not collected. For example, non-Hispanic Black women are three to four times more likely to die from pregnancy-related factors than non-Hispanic White women. However, determining why non-Hispanic Black women bear this disproportional burden requires an understanding of factors influencing maternal mortality including comorbidities, chronic diseases, provision of and access to care, maternal age at time of pregnancy, and various social factors such as income, housing, and education.
Challenges with Federal Data: The sharing, retention, and use of personally identifiable information across multiple government programs, even when data collection reaches sufficient levels of granularity, is generally limited and strictly regulated, which creates challenges for data merging, management, and analysis. Data captured and used by federal agencies is understandably safeguarded to protect individual privacy and ensure the data is not appropriated for unauthorized uses. Some of these safeguards are imposed by statute, but many are a result of internal policy. These safeguards to protect data privacy and restrict use often result in data stovepipes within and across agencies, which make the data inaccessible for analysis beyond the purpose for which it was collected. Without express authorization, data sets may not be combined, even if a joint analysis would reveal meaningful impacts beyond analysis of each data set alone.

In addition, data captured by federal agencies is not always defined consistently across program areas even within the same agency, let alone across agencies. This lack of consistency and standardization makes it difficult to understand and draw comparisons between equity performance and outcomes within and across agency programs. For example, federal agencies lack consistent definitions of disability and standardized eligibility criteria for government-designated disability status, making it difficult to gather accurate information about and cross-reference individuals’ disability status with demographic data such as race or sex. Furthermore, federal data does not always track location to an extent that would provide actionable information at the community or sub-community levels.

Challenges with Non-Federal Data: While state and local governments, charities, academia, and industry each capture useful data, that data is often not readily available to other entities. Even if the data were to be shared, analysis across data sets is difficult because the data definitions are not standardized and the data outcomes are not scalable to the nation as a whole. In addition, data held by states is subject to state privacy and data security laws and is often not shared with federal agencies unless authorized by statute. Data-sharing agreements can be used to obtain data from non-governmental or community organizations, but provisions contained within these data-sharing agreements and requirements imposed by privacy and data security laws may restrict how the data may be combined and analyzed. As a result of these inconsistent provisions, prohibitive legal requirements, and a lack of common data-sharing capabilities, the inability to share and combine data sets limits equity-related decision making.

The Racial Equity Executive Order Presents an Opportunity to Facilitate Effective Data Sharing and Analysis

The Biden Administration has adopted a whole-of-government approach to racial and social equity. The Administration’s fundamental strategy, led by the Domestic Policy Council, is clear: To counter systemic inequity, the government must ensure that all policies include principles and approaches that remedy inequities and promote equitable outcomes. The Racial Equity Executive Order (Advancing Racial Equity and Support for Underserved Communities Through the Federal Government) requires federal departments and agencies to identify relevant data, eliminate barriers to achieving racial equity and equity for underserved communities, and embed equity-centered design into key policies and programs.

The Racial Equity Executive Order also directs the inclusion of impacted communities in the policymaking process. This inclusion recognizes that quantitative input gained from data is best coupled with qualitative input gained from people’s experiences and stories to better understand the needs of communities and counter biases that may be built into analyses.

To counter systemic inequity, the government must ensure that all policies include principles and approaches that remedy inequities and promote equitable outcomes.
The Racial Equity Executive Order reinforces the importance of a data-driven approach by establishing an Equitable Data Working Group (EDWG) to address concerns that “many Federal data sets are not disaggregated by race, ethnicity, gender, disability, income, veteran status, or other key demographic variables.” The executive order also makes clear that the failure to disaggregate “has cascading effects... impeding[ing] efforts to measure and advance equity” and that “a first step to promoting equity in Government action is to gather the data necessary to inform that effort.”

Across myriad fields, many individuals and organizations are exploring the nexus of government data, demographic variables, and equity policies that factor in known disparities for marginalized groups. In health policy, organizations like the Center for Law and Social Policy have outlined how Medicaid block grants will have disparate effects on communities of color, and the National Academy of Medicine has gathered data on how race relates to health outcomes, school expulsion, and health literacy. In economic policy, Aravind Boddupalli and Kim Rueban with the Urban Institute wrote a study outlining how data tools could be used to help policymakers design a more equitable tax system. In the field of criminal justice, organizations like the Brennan Center for Justice have outlined how mass incarceration affects poverty rates and depletes local economies. Additionally, the Vera Institute of Justice has led efforts gathering missing granular incarceration data for analyzing immigrant detention, jail expansion, and local incarceration trends. In education policy, academic organizations like the Education Policy Analysis Archives are publishing articles linking data on racial discipline gaps to racial achievement gaps in the United States.

There is limited work pursuing a whole-of-government data collection approach; the Equitable Data Working Group established by the Biden Administration Racial Equity Executive Order has an opportunity to fill this void with a standardized, cross-government data collection approach. The EDWG will need to define, find, and analyze data that can help decision makers identify equity issues, evaluate the impact and implications of policy and plans on equity across government missions, and measure effectiveness of policy. The EDWG should strategically engage partners inside and outside of government at the federal, state, and local levels who are already conducting detailed data collection and equity analyses. Alongside these partners, and consistent with established analytical frameworks (Figure 1), the EDWG should focus on identifying the right questions, analyzing joint data sets, and understanding the impacts of policies on underserved communities so that decision makers can promote meaningful social justice changes across all levels of government.

Below, we outline multiple recommendations to achieve these objectives.

**Recommendations**

Executive Branch Agencies and the Office of Management and Budget can take three actions to create robust equitable data practices to support the goals of the Racial Equity Executive Order. The three key actions are to refine data practices and policies to address barriers to data collection, standardization, and analysis; leverage and learn from successful programs that collect and use local data; and establish a close strategic partnership between the EDWG and Chief Data Officers (CDOs).
**Refine Data Practices and Policies**

**Recommendation**—The EDWG should adopt the following common data practices and policies to support whole-of-government sharing and analysis:
- Use a consistent method to clarify and address relevant analytic questions.
- Develop data standards, including but not limited to definitions of identity groups, income classes, and common local geo-location fields.
- Propose the use of common measures that can be compared and tracked over time.
- Partner with state and local governments, which are closest to and keenly aware of the unique challenges found in the communities they serve. This partnership could take many forms, such as launching a National Policy Equity Council chaired by the Domestic Policy Council with members from the National Governors Association and the Conference of Mayors.

Consistency in data practices, structure, and standards established through close collaboration with state and local governments would enable broader scaling and application of policies, leading to enhanced policy efficacy.

**Recommendation**—The Domestic Policy Council should sponsor or endorse a Data Equity Consortium:
- The Consortium would be a coalition of private sector, academic, and community stakeholder groups operating independently of the government but with government interest and engagement.
- The Consortium would coordinate the discovery and sharing of research, insights, data, and innovative ideas from the private sector, academia, and the policy “think tank” community, perhaps with the specific responsibility of making recommendations to the government.
- Patterned after the COVID-19 Healthcare Coalition formed by the Mayo Clinic and MITRE with over 1,000 private sector and academic participants, the Consortium would help validate and gain broad support for data-driven policy recommendations at the federal, state, and local levels and serve as a key focal point for the EDWG to engage broadly across all sectors.

Such a Consortium would enable the collection of a diversity of policy approaches, leading to novel ideas that could address equity concerns in innovative new ways.

**Recommendation**—The Domestic Policy Council and EDWG should establish overarching policies, and where needed, support legislation that enhances broader data access in the following ways:
- Facilitates transparent analysis of multiple data sets in a way that balances privacy issues with the ability to obtain actionable information.
- Amends data intersection restrictions to allow commingling of data sets to advance equity (while still protecting individual privacy).
- Embeds standard, consistent language into data-sharing agreements to permit additional analysis to better understand equitable impacts and potential solutions.
- Aligns data practices with clear guidelines for ethical use and incorporates best practices that preserve privacy protections.
- Provides a defined retention period for the analysis of data before the underlying data must be destroyed.
- Prohibits the disclosure of individual or summary data revealing personal identities.
- Permits governments to collect geo-location data.
- Requires the accurate, transparent, and clear reporting of all findings, including uncertainty in the findings, without political influence.
- Ensures data authenticity and provenance for accurate findings.
- Provides for trusted third parties to collect and analyze data sets and validate data analyses and conclusions.
- The Federal Government should provide grants to state and local governments to update systems for improved equity-related data collection; systems funding is often a barrier to collection.

Increasing broader data access while balancing the protection of personally identifiable information will enable more focused, strategic, and effective policy design.
Replicate Successful Models for Obtaining Local Data

Recommendation—The federal government should leverage new data collection and management methods already being implemented by many local communities:

- **Collaborative partnerships provide access to data and analytic insights.** Various community groups, such as the San Antonio Area African American Community Fund (see Figure 2 below), have demonstrated that a unified coalition including local stakeholders can bring about meaningful change. Strategic use of data for decision making can be accomplished through collaborative partnerships between federal, state, and local governments, along with not-for-profits, research institutes, academia, large and small businesses, charitable organizations, and commercial sources.

- **Leverage and promote standards across federal, state, and local governments.** To scale or replicate successful local models (as accomplished by the National Neighborhood Indicators Partnership, see box below), there may be opportunities for federal CDOs—working across state and local boundaries—to promote data standards, facilitate data collection and sharing, and enable re-creation of successful efforts in communities around the United States.

By engaging community stakeholders and leaders of successful grassroots models, the federal government can learn best practices for particular local problems, thereby ensuring policy efforts are addressing real-world equity issues observed at local levels.

---

**The San Antonio Area African American Community Fund (SAAAACF)**

has created a collaborative effort to identify and address inequities into focus areas of education, population, finance, health, criminal justice, and social factors (Figure 2). Data is collected from the public domain in each of these focus areas and standardized across the relevant attributes to enable evaluation of any given policy or program according to measures of success unique to each focus area. A prerequisite for this success was Texas state and local governments passing bills (similar to those found in many other states) requiring sufficient levels of granularity in terms of data collection. This model was derived in large part from a state-wide collaborative organization, the Indiana Commission on the Social Status of Black Males, illustrating how data-driven programs can be replicated at local levels around the United States.

---

**The National Neighborhood Indicators Partnership**

has successfully replicated and scaled localized data methods. The partnership brings communities together to ensure they have access to data and skills to advance equity and well-being across neighborhoods and brings decisive analytics at a localized level, informing more impactful and equitable decisions by local decision makers.

---

**Figure 2: San Antonio Area African American Community Fund Program Evaluation Process**
Strategically Partner with CDOs

The EDWG, tasked with the national responsibility of promoting data-driven equity in government action, is strategically situated as a coordinating body to manage our national data gathering and sharing efforts. However, the EDWG must be staffed appropriately and informed of these local data gaps to drive impactful change at the community level. Collaborating with the Federal CDO Council would provide the EDWG with a strategic opportunity to understand these local gaps.

The Evidence-Based Policymaking Act requires federal cabinet agencies to each have a CDO to leverage data for improved federal government efficiency and effectiveness. CDOs are commonly found in industry and the role is expanding at the state and local levels, with over 25 state CDOs. In line with the 2020 Federal Data Strategy Action Plan, the Federal CDO Council officially launched in 2020 with the intent to “develop resources to support CDOs in fulfilling their responsibilities under the [Evidence-Based Policymaking Act], identify and evaluate new technology solutions for improving the collection and use of data, and coordinate with other government-wide councils that conduct data-related activities.”

To create a strong partnership with the federal CDOs, we have two recommendations:

Recommendation—Add the Federal CDO Council Chair to the EDWG:

- Each agency’s CDO should be engaged in their agency’s equity data efforts; CDOs have also have unique access to data resources and should therefore be used to build data-driven approaches to positively impact marginalized people groups. CDOs could collaborate with other agency leaders who establish and implement operational and programmatic data standards and protocols.
- The Federal CDO Council Chair would be a focal point for the EDWG to obtain access to standardized CDO practices, allowing for appropriate data management scaling and application across federal agencies, opening doors of collaboration and information sharing, especially in terms of data benefiting marginalized groups.

Recommendation—Establish a Federal CDO Council Equitable Data Subgroup:

- This subgroup would be uniquely positioned to work directly with state CDOs, who not only are privy to missing data but also would likely have information on local programs. The subgroup could also gather and share best practices with the Federal CDO Chair and scale the programs at a higher level or disseminate them to local communities for re-creation around the United States.
- This subgroup could collaborate with—and inform the data collection of—CDOs at each federal agency, shaping the expectations for federal CDOs as to their data collection, standardization, and harmonization.
- This subgroup could also be leveraged by each individual federal agency to meet the desired outcomes of Executive Order 13985 in “assess[ing] whether, and to what extent, its program and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups.”

The addition of the Federal CDO Council Chair to the EDWG as well as an Equitable Data Subgroup would establish and streamline the standardization of data collection efforts at a national level, increasing the efficacy of data sharing across agencies and programs.

Conclusion

Addressing systemic inequities through all policies, not just through equity-specific policies, is aspirational. Yet, the goal becomes far more achievable if government leaders work expeditiously to address barriers to using data to achieve equitable outcomes. Moreover, the Racial Equity Executive Order provides an opportunity for constructive collaboration to enable the collection, analysis, and sharing of data. Improved quantitative data, assessed with qualitative data obtained in consultation with stakeholders who have lived the experience of a program, moves us much closer to understanding and addressing equity in all domestic policies.
MITRE’s mission-driven teams are dedicated to solving problems for a safer world. Through our public-private partnerships and federally funded R&D centers, we work across government and in partnership with industry to tackle challenges to the safety, stability, and well-being of our nation.

© 2021 THE MITRE CORPORATION. ALL RIGHTS RESERVED. APPROVED FOR PUBLIC RELEASE. DISTRIBUTION UNLIMITED. PUBLIC RELEASE CASE NUMBER 21-1627


