CALIFORNIA RACIAL EQUITY COALITION

September 24, 2025

To the California Racial Equity Commission and Staff:

On behalf of The California Racial Equity Coalition (CREC), we write to express our profound gratitude and admiration for the momentous work reflected in the draft Racial Equity Framework (REF). This document lays a crucial and powerful foundation for the transformative work to come. The spirit of community partnership and the vision for a government that works alongside its residents is not only palpable but at the very soul of this endeavor.

The REF stands out as visionary, signaling once again that California has the moral clarity, obligation, and ambition to lead on issues of justice and equity. Its consistent emphasis on data disaggregation and co-governance principles provides a strong and actionable values-based compass for the state.

As you move into the revision and finalization phases, our collective hope is that the Commission will **own its mandate**, as designated by Governor Newsom, **to connect values to action, provide a clear roadmap, and advance a process that lives up to its own recommendations** to effectively support government entities who will use this document. We offer the following comments in a spirit of partnership and shared commitment to actualizing an equitable California and fulfilling the Newsom administration's mandates. Additionally, below we provide an appendix of our detailed analysis of the REF and its Appendices, which echo the Commissioners' own recommendations made in the recent meeting on September 17th, 2025.

- **Own the Moment and the Mandate of the Commission**

  The Commission has been given the mandate to create a path forward for a racially equitable California and address the emergency of inequities facing communities around the state. This critical moment demands a framework that speaks with the authority and clarity the Governor's mandate entrusts and endows it with. We also recommend issuing a direct call to action to the Governor, the Legislature, department heads, and agency chiefs to issue directives, allocate budgets and necessary resourcing, and initiate mandatory changes to practices, policies and protocols to advance racial equity, inclusive of a policy roadmap for the CA Office of Racial Equity. We encourage the Commission to own this work, own the solutions presented by community members and experts, and lead the transformation by speaking with conviction and plainly stating how and why government entities should carry forth the framework's recommendations. For example "These are the key actions agencies should implement and be held accountable for to meaningfully advance racial equity…" For the Commission's goals to be operationalized, they must be resourced and required, eliminating ambiguity and uplifting actionability for state agencies and their staff.

- **Connect Values to Actionable Directives**

  For state entities to be able to take the REF and implement the Commission's vision effectively, they require clear and specific direction. We recommend mapping out clear activities and roles that will help government entities move from concept to practice. For every recommendation, we urge the Commission to identify specific government entities who should lead and provide recommendations for how they should take action. Additionally, we strongly recommend that the REF advance a slate of policy recommendations to help identify the legislative levers necessary to truly empower its use. Policy recommendations can help the Governor and the Legislature understand and activate the critical legislative powers to make directives and mandates for this work, and also identify the structural and procedural barriers to integrating racial equity into government operations.

- **Provide a Clear Roadmap for Legislative Leaders & Government Entities**

  We recommend outlining a clear process that government entities can undertake to use the REF in their departments and agencies. This should include detailed, standardized plans or templates that can serve as a baseline for government entities to begin implementing the REF in their domains of influence. A comprehensive plan can draw from the REF's core elements and recommendations, and focus on advancing equity in community engagement, budget, data, and governmental infrastructure. A sequenced, concrete, and step-by-step process that walks government entities through assessing and redesigning their processes around these four key elements will help the REF succeed in its objective to guide government entities to more strategically and strongly center racial equity.

The recommendations we make to you today are consistent with the data- and community-driven recommendations we have provided to the Commissioners, its staff and executive leadership in CA since 2021 and the legislative advocacy of Senate Bill 17 (2021). Below is a summary of recommendations that remain critical to integrate in the current REF and exemplify actionable directives that can achieve the Commission's stated goals. Specifically, we uplift the national study completed by the State of Equity, Public Health Institute, in 2023 that recommends how best to build a framework for the State of California. Many of the findings and best practices reported therein are found in the Commission's Toolbox. CREC has also provided the following:

- 📄 CREC Budget Tool Brief ;
- 📄 CREC Racial Equity Framework Brief ;
- 📄 CREC Prop 209 Orientation 2024 ;
- 2025 Framework Recommendations.

The Commission has an abundance of resources at its disposal, including the Reparations [Task Force Policy Recommendations](link), which set a remarkable standard for state advisory bodies to develop bold, actionable frameworks. And lastly, the State of Oregon developed a 2021 [statewide equity framework](link) that outlines actionable next steps for each state entity to address inequities from inside government. By taking these additional steps to strengthen the draft REF, the Commission has the opportunity to solidify its legacy and fulfill its transformative mission.

Commission Process that Lives up to its Own Recommendations:

In addition to our recommendations for the REF, we also want to voice our concerns with the process, timeline, and deliberation of the REF during the Commission meeting on September 17th. While the REF powerfully elevates the vision and spirit of how and why state government should lead with racial equity and community at the heart, we were deeply disappointed and concerned about the short time frame Commissioners were given to discuss their feedback and reactions to the REF.

After more than a year of community engagement, presentations by guest speakers, research, and analysis conducted by the Commission and staff, *less than one hour was given to Commissioners to fully discuss, analyze, and provide feedback on the draft REF and appendix*, which amount to over 300 pages of content. The dialogue and compressed timeline for commissioner input, including the compressed discussion at the public meeting and less than 24-hour window to submit written feedback, significantly limits the Commission's ability to incorporate their perspectives and expertise into the draft REF. While we understand the constraints the Commission and staff are working under to comply with the Bagley-Keene Act, the quick timeline risks undermining both the REF's merit and spirit, and importantly, public confidence in the process. To move forward productively, it is critical that commissioners be given adequate time for review and discussion, and that their feedback be meaningfully considered and visibly incorporated into revisions. Without these changes, the REF cannot fully reflect the collective expertise, leadership, and authority of the commission.

Similarly to commissioners, communities and advocates had very little time to fully digest and analyze the volume of content within the REF and toolbox, much less to turn around and submit written public comment in time for the Commission meeting. And while the Commission's website invites the public to submit written comments by the 24th of September, it remains unclear to CREC, after the various points of discussion throughout the meeting, whether public comments received by this deadline will be considered for incorporation into an updated draft or not. Whether all public comments will be taken into account or only those that meet a particular timeline, we bring attention to the commission's draft community engagement toolkit, which the staff originally proposed a 30-day comment period for the draft REF. A pivotal document of this size and significance will be strengthened by a substantive and transparent feedback process and timeline.

Therefore, we urge the Commission and staff to:

1. Meaningfully consider all feedback provided by the Commissioners and the public received by 12 pm on September 24th, the publicly posted deadline.
2. Extend the current public comment period for the REF draft to give staff, Commissioners, and public adequate time to participate before the draft is finalized *after* the October 14th REC meeting.
3. Dedicate at least 80% of the time in the October Commission meeting for Commissioners to deliberate, discuss how feedback was/was not incorporated into the draft, and identify additional revisions necessary to achieve a final draft that the Commissioners can vote to approve.

It is imperative that both the Commission's process and the final racial equity REF lean into and live up to the values it stands by.

In closing, we thank you again for your dedication and courage. This Racial Equity Framework is a testament to the hard work of the Commission and its staff. By **owning the Commission's mandates, connecting values to action, and providing a clear roadmap for government**, it can become the powerful call to action—and practical playbook—that California needs and deserves.

We are excited to continue partnering with you to bring this vision to life.

In solidarity,

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Appendix: California Racial Equity Coalition Recommendations & Analysis for the Draft Racial Equity Framework

Overarching Principles of Government Racial Equity

The Coalition analyzed the Racial Equity Framework (REF) with the following principles in mind:

- **Procedural Equity:** Ensure internal state and external public-impacting processes are racially equitable, inclusive, and responsive.
- **Distributional Equity:** Ensure programs, resources, services, provisions, contracts, and procurement are distributed equitably.
- **Longevity:** Make racial equity last in California state government function and outcomes. Racial equity lasts when the government establishes *permanent* infrastructure.
- **Accountability & Transparency:** Establish mechanisms for accountability and transparency with the public in all aspects, levels, policies, and structures.
- **Evaluation & Measurement:** Use disaggregated data and community experiences to inform and develop metrics for racial equity outcomes and budgeting.
- **Value Wellbeing:** Establish expansive equity indicators to increase equity impacts. Ensure that the health and wellbeing of communities, land, and ecosystems are held in high priority, meaning that they are an essential and weighted evaluation and decision making criteria.

We see the objective of the REF as systematically embedding racial equity into the core functions of state government to create real changes that communities who've been harmed or abandoned by government, making government systems and impacts fair and supportive of the thriving of all Californians. The REF should do so by creating the action plans for California government and its legislature to:

- Build permanent capacity within agencies for racial equity work
- Establish recommendations for resource allocation for systemic changes
- Create pathways to trusting community partnerships
- Build implementable, rigorous accountability tools and standardization
- Create statewide definitions of racial equity for government and legislative use to address racially disparate outcomes of government impact
- Provide clear, actionable steps agencies need to take to achieve an equitable reality for California's most vulnerable communities.

The goal is to transition racial equity from a suggestion to a mandated, practiced function of government with measurable, felt impacts on people's daily lives.

Below, we include an analysis of the REF made against past recommendations CREC has sent to the Commission. We hope that you consider both the recommendations that have not been included in the REF and the accompanying analysis to create a strong, actionable Framework.

Overarching Coalition Analyses

- While the REF offers a strong step forward in suggesting goals and intentions for a racial equity strategy, the REF misses the chance to be directive, strongly recommend changes, and provide actions.
- REF asks that users/readers switch between REF, the appendix, and linked items in a way that makes it cumbersome for users to understand what is needed from them. Racial Equity work in government is already seen as laborious and arduous. The way it's written is not user friendly. It's not practical.
- REF offers a lot of case examples of how REC or other entities implemented equity strategies/best practices but doesn't offer directives, strong recommendations, or detailed equity considerations/strategies to help government understand how to concretely operationalize change. There is a disconnect between best practice and how it would be implemented by government workers.
- Integrate parts of the appendix that *do* have clear recommendations, tools, and resources directly into the report so as to not bury critical information.

CREC Recommendations	REF Analysis
Internal Capacity Building: Dedicate resources to establish lasting practices, staff structures, and technical assistance networks within government.	There is no clear guidance or specific tools on how to build internal capacity. Although REC has been mandated per the EO to offer TA, the REF is written in a way that overall communicates that government entities *could* start doing things like this but if there is not specific TA/training/guidance, etc. already being offered there will be a huge gap between REF theory and practice.
Community Power-Sharing: Normalize full community participation and collaboration in decision-making processes.	The REF includes robust community engagement recommendations, and highlights "co-governance" strategies Although co-governance and community engagement spectrum is discussed, the REF falls short in helping government to assess/evaluate where they might be on that

CREC Recommendations	REF Analysis
	spectrum, examples of what an organization would do or look like if they were at each part of the spectrum, and actionable equity strategies or steps to get to the next level. What does co-governance look like concretely? Evaluation should also include the community's reflection and assessment of where the organization would fall on the spectrum as well to ground truth how government organizations would assess themselves.
Accountability Mechanisms: Implement required tools (e.g., racial equity assessments, budget equity tools) with clear standards and evaluation processes.	Not present; There is a section on Evaluation on pg. 44 but does not state a structured evaluation strategy. "*The commission will develop a self-evaluation in partnership with an external evaluation team…*"

Overall, the REF and appendix offer cases of how REC or other entities implemented equity strategies but doesn't offer standardized tools for government workers to concretely take actionable steps for policy/practice change. |
| Expansive Equity Definition: Move beyond one-dimensional goals to prioritize a comprehensive set of equity outcomes affecting all aspects of life. | Pg. 24 talks about developing an equity index but there is no guidance on how to do this effectively or tools to use. |
| Legislative Action: Use the REF to pave the way for future legislation that codifies these practices into law. | Not present. Pg. 33 mentions an Impact Analysis |
| REC recommends Leg/GO Establish an Office of Racial Equity (ORE) with a mandate and dedicated funding to lead all efforts. | Too general and not explicit.

Missing recommendations on vision, mission, responsibilities, authority of a REC and definitely doesn't discuss dedicated funding |

CREC Recommendations	REF Analysis
REC recommends ORE / agency leadership Develop & Mandate Racial Equity Tools for all new policies, practices, and budgets, requiring an analysis of community impact.	Pg. 30 but no specific duties given just alignment and accountability
REC recommends ORE Launch a Community Partnership Program to formalize power-sharing relationships, including stipends and resources for community participants.	Not mentioned
ORE/Office of Data & Innovation (ODI) Define and Adopt Expansive Equity Indicators across all agencies	Not mentioned
ORE/ODI Commission a Statewide Equity Mapping Project to identify baseline needs, gaps, and required infrastructure.	Not mentioned
Form a working group to finalize the structure and authority of the proposed Office of Racial Equity (ORE)	Not mentioned
Begin drafting the enabling legislation to formally establish the ORE and mandate the use of racial equity tools.	Says ORE "could" "may" be created and do things but does not recommend legislation to achieve it. Use stronger language
Initiate an RFP process for the statewide equity mapping project and baseline report.	No mention of this. Pg. 25 talks about Equity Explorer (which is extremely hard to navigate and understand) and the L.A Equity Index.

Budget Equity Tool and Processes

To fulfill Gubernatorial mandates within EO N-16-22, one objective of Commission and the REF should be to establish pathways for, create, normalize and institutionalize the use of Budget Equity Tool (BET) across state government to change currently inequitable systems and ensure budget processes are equitable, community-informed, and analyzed for both investments and extractions. This requires building a robust data infrastructure to support this work.

Overarching Coalition Analysis:

- The REF section "Understanding Budgets and how it impacts Communities" should identify pathways to and recommendations for permanent partnership and collaboration with CA's Department of Finance (DoF) to coordinate statewide adoption and adherence to budgeting for equity, including developing new processes, addressing old, harmful processes that impede equity outcomes and create negative impacts on communities of color.
- There needs to be more focus on the state budget process overall, and integrating the community engagement and data recommendations made in the previous chapters to ensure budget processes are transparent, participatory, understandable, and accountable to communities.
- We need an entity that will counsel, coach, and support depts/agencies in connecting the dots between budget decisions and community investment. How will this budget equity tool be implemented? This should be, in the long run, the Office of Racial Equity, working in partnership with the DoF.
- This section should have a stronger focus on structural budget issues: How do we get from responses to questions to integrating procedural equity into the budgetmaking process? Outside of a BET or BCP, recommendations to integrate meaningful community input and influence over budget decisions will help advance budget equity and shared governance.

CREC Recommendations	REF Analysis
Community-Driven: Communities must directly inform budget policies, analysis, and outcomes.	Mention of community engagement, but not positioning communities to directly inform policy, analysis, or outcomes. On page 94, focusing on the BET, asks "Did your department or agency actively seek public engagement from impacted groups or communities in the development of the proposal, and ongoing? If so, how have and/or will impacted communities be engaged?" and

CREC Recommendations	REF Analysis
	"What is your public engagement plan? What is your plan to track and ensure the most impacted communities are reached? How do you track data about impact and services provided? How will that engagement be assessed and who will be a part of this evaluation process? c. How have or how will impacted communities be able to provide input to inform goal setting and decision making?" These are prompts for yes/no answers with room for elaboration but no requirements to engage community in a meaningful way. The BET can make specific recommendations, pulling from community engagement recommendations in the REF, for how and at what level communities should be engaged on budgets.
Lead with race; Budget equity requires extensive analysis of racial inequity. Leading with race is an important starting point to examine broader systemic inequities affecting marginalized communities with diverse experiences. Use the words "race" and "racial equity" in the BET	Budget equity tools in the appendix do not specifically lead with race, but use proxy terms to assess how government entities' budget is consulted with and works in service of "historically impacted communities." Additionally, the REF clearly states that "Budget equity means applying an equity lens to every stage of the state budget process, moving beyond 'what's in the budget' to 'who benefits, who is left out, and how to fix it.'" This language in this section can be more explicit about leading with race, and elevating recommendations to share power and budget decisionmaking with communities.
Systemic Integration: The BET must be a standard, resourced, and required practice for budget analysts.	Not required for DOF nor State within the REF.
Holistic Analysis: Budgets must be analyzed for both equitable investments and harmful extractions (e.g., fines, fees).	BET includes a set of standardized questions that government entities can use while making "budget change proposals (BCP)." There is a focus on identifying gaps in

CREC Recommendations	REF Analysis
	investment, but not an explicit articulation of harmful extractions like fines or fees. However, there is a question that asks agencies/dept's to identify how their proposed BCP may benefit or burden communities.
Data-Driven Decisions: A foundational data infrastructure is required to accurately measure equity and guide budget decisions.	There is consistent mention of data disaggregation and the use of spatial data to assess level of investment by geographic area and population. Additionally, the REF makes mention of the importance of an equity index that can ground budget decisions in real data.
REC recommends the Governor's Office/Legislature/DoF/ORE Formalize & Mandate the Budget Equity Tool (BET) across all state agencies, ensuring its use is a required part of the annual budget process.	Does not formalize or mandate a tool. Says that "the incorporation of a series of standardized questions" for budget assessment can help decision-makers understand if their resources are benefitting disadvantaged communities. The REF can make specific recommendations for the inclusion of equity metrics
REC recommends ORE/DoF Develop and Fund a Training Program for budget analysts and government workers on how to use the BET, analyze budgets for equity and extraction, and integrate community input.	In the Appendix on Budget Equity Tool (p. 105): [As a next step], Explore training and technical assistance opportunities for Department of Finance (DoF) analysts, agency subject matter experts on equity, and agency budget analysts
REC recommends ORE/Office of Data and Innovation Create a Statewide Equity Index as a necessary data infrastructure to inform the BET. This tool would map community needs and disparities to guide budget decisions.	Highlights a case example: LA City Equity Index by Catalyst, but should include recommendations or a starting point for how an equity index can be established statewide.
REC recommends ORE/Oversight office/DOF establish a Technical Assistance Center to provide ongoing support, resources, and	In the Appendix on Budget Equity Tool (p. 105): [As a next step], Explore training and technical assistance opportunities for Department of Finance (DoF) analysts,

CREC Recommendations	REF Analysis
education to agencies implementing the BET and using the equity index.	agency subject matter experts on equity, and agency budget analysts
REC recommends Leg/Budget Committee Legislative Action to secure dedicated funding and resources for the BET process, training, and the development of the data infrastructure.	Not included.
Sample Questions to Include in the Budget Equity Tool 1. How does the proposed budget request align with clearly defined racial equity goals or plans in the office, department, agency, and state? 2. How does the proposed program, policy or initiative improve racial equity? 3. Who will be impacted and how will they be impacted? 4. What data was used to make projections and determine community needs? If more data is needed, how is this being addressed in lasting ways? 5. How have communities been included in goal setting & decision making? How have relationships been fostered for ongoing inclusion?	While the standardized budget questions in the BCP are a great start, there are no clear connections between analyzing budgets for clearly defined racial equity goals or plans. No explicit mention of racial equity in the BCP- Budget Equity Worksheet. There is currently no state or federal law that prohibits making analyses and assessments of budgets, policies or programs and their impacts using a racial equity lens to understand the most acute impacts. There is a question about whether or not communities were engaged in the process, but can strengthen details about whether engagement provides meaningful opportunities for communities to help set or shift budget goals, investments, or budget priorities.

Office of Racial Equity

We see the objective for the CA Office of Racial Equity (ORE) as creating a permanent, powerful, and fully-resourced state body that will ensure the full implementation, accountability, and longevity of the REF across state government, beyond the temporary lifespan of the current Commission which is set to end in 2030 and possesses limited authority.

Overarching Coalition Analysis

The language focused on the ORE should be more directive and detailed to ensure state policymakers take on the charge of establishing an ORE and granting the Office sufficient power and authority to support statewide systemic change that brings about equity for Californians. It is critical that the Commission make very clear the main utilities and functions of the ORE in order to create executive and legislative buy-in in a timely manner that reflects the urgency of the need for racial equity in California.

As one of the key strategies for achieving the Commission's goals, the ORE requires an action plan to achieve it and language of authority in its recommendation. Examples of this include:
- "In order to create a central, resourced hub/body that leads, coordinates, and holds the government accountable for continuous racial equity progress, the Commission strongly recommends the immediate and urgent development of a policy roadmap, developed in partnership with the state legislature and all relevant parties, to statutorily establish a permanent office of racial equity that has dedicated budget and staff of experienced racial equity practitioners."
- "The Commission recommends that the ORE is empowered to function to:
  - Build statewide capacity, racial equity training, including BET training and technical assistance, and supports data collection and analysis for equity
  - Create guidance & elaborate on frameworks and tools developed by the Commission and create frameworks and resources for agencies to develop their own Racial Equity Action Plans (REAPs) while ensuring adherence and fidelity to effective racial equity principles.
  - Coordinates and convenes department secretaries and racial equity leads to ensure alignment and share best practices.
  - Maintains accountability by measuring, evaluating, and reporting on the progress of state agencies toward their racial equity goals.
  - Make enforceable recommendations to state entities to ensure that racial equity does in fact become the outcome of state government process, practice and policy.
  - Partnership with DoF: Co-develop and co-implement the BET, and serve as a technical advisor to DoF for analyzing budget proposals.
  - Build a Network of Practitioners to support the development of embedded racial equity capacity within each agency, including:
    - Identifying Racial Equity Leads in each department.

- ■ Supporting internal Racial Equity Strategy Teams and Working Groups.
- ■ Ensuring this network has the tools and authority to implement change."

CREC Recommendations	REF Analysis
Permanence & Sustainability: The ORE is proposed as the permanent body to drive the REF forward, ensuring the work continues after the Commission sunsets.	Can have stronger language about the permanency and necessity of the ORE. The section does not discuss directly that REC will sunset which is also an important "why" of creating an office - key decision makers may not understand this.
Mandate & Mission: Its mission is to operationalize racial equity within the state government by coordinating across agencies, building capacity, providing technical assistance, and ensuring accountability.	Not a mandate, a suggestion. Includes language around coordination, TA, capacity building and accountability, but lacks clear directives about how it will be implemented, who it would hold accountable etc.
Authority & Resources: It is critical that the ORE is not just advisory but is a dedicated office with real authority and adequate resources to mandate accountability and growth.	Senior level equity roles, will they have authority? Does say accountability and coordination Doesn't say mandate, and uses soft, suggestive language as opposed to requirements or strong recommendations. Recommendations for an ORE should be more direct and specific about what it should and should not be
Core Functions: The office is tasked with: ● Helping agencies complete and implement their racial equity plans. ● Ensuring alignment with the broader REF. ● Facilitating community engagement and power in government. ● Building partnerships with local government, philanthropy, and private organizations.	Does not explicitly make any of these statements. The REF should define the role and duties of an ORE.

CREC Recommendations	REF Analysis
Commission advocates for establishment	Yes.
REC recommends Legal Counsel/Policy Advocates Draft authorizing legislation or executive order to formally create the ORE.	Not mentioned
REC recommends Budget Offices/Officials Secure dedicate funding and resources for the ORE.	Not mentioned
REC recommends defining the specific authority and reporting structure of the ORE	Not mentioned
REC recommends and develops a transition plan proposal from the Commission to the permanent ORE.	Not mentioned

Community Engagement and Co-Governance

We see the objective of establishing strong, clear co-governance strategies and action plans institutionalizing a culture of shared governance where state government policies and decisions are made *with* underserved communities, not just *for* them. This involves treating community engagement as a continuous, transparent, and two-way process, moving beyond tokenistic and consultation to genuine collaboration and power-sharing. It means providing the template for agencies to expand upon to actualize true community engagement that shifts power into their hands. It means not just extracting stories from communities, but establishing a procedure and process for bringing voices back to government and developing timely, effective responses that communities can feel so that their voices feel heard.

Overarching Coalition Analysis

- The Community Engagement Plan (Appendix page 63) needs stronger, more directive guidance as well as templates and tools so that agencies and departments can move confidently ahead with effective, coordinated community engagement.

- The engagement toolkit is not really a tool per se; it's a general case study on how the Commission and staff did their engagement and some considerations/caveats of their own process. This section can be so much more, giving equity considerations and caveats while creating a community engagement action plan and process.

- The REC engagement process outlined in the appendix is more so for a community input meeting process rather than to plan for engagement - what are the equity questions/considerations that the government needs to ask and understand before planning an engagement meeting/process for programs?

- This section needs to spell out that "this is a best practice" more explicitly. Great that you give a REC example but spell out/recommend that every department should implement this best practice in their community engagement/plan.

- CREC looks forward to seeing the future tools and strategies for the community engagement section, which we hope provides concrete examples and processes government entities can take to create more equitable community engagement processes. Overall, the REC had a more robust community engagement plan and process than some state departments/programs; and we congratulate them and the staff on their efforts. However, they should have done more direct engagement with the government/state worker community and integrated more of the learning from the Possibility Lab's Asset Landscape of CA state equity infrastructure conducted for the REC earlier this year into the framework to address the stated needs of staff to conduct equity work.

- There are some really good bits in here, including highlighting the importance of language, ability, geography, compensation, and food/drink as foundational to achieving robust engagement, but this section often does not answer the question of "why" quite specifically enough. For example, why is addressing language, ability, and geography important to a robust community engagement process, and why do we want a robust (and representative) community engagement process in the first place? Same with shared governance, *why* are we talking about shared governance here? Why should government entities consider integrating shared governance strategies into decisionmaking and budgeting? We need to connect those dots for future government entities who will be using these materials. Assume that all users of this document are beginning from an entry-level in understanding of racial equity, and establish a baseline for government entities to use this document.

CREC Recommendations	REF Analysis
From Consultation to Collaboration: Recommend structures that all departments	Spectrum is referenced but no specificity on where departments must advance. Needs a

CREC Recommendations	REF Analysis
must advance to at least the "collaborate" level on the Spectrum of Community Engagement within 5 years.	more helpful explanation to understand where a department/program is on the spectrum or standardized way for departments/programs to assess it. Uplifted 1-3 but no indication how to move to next steps.There is a part that discusses the first 3 steps are pre-requisites to a shared gov model (pg 14 and 18). This section should include additional details on the description/explanation about how to "achieve" a certain level and the corresponding example of policy or practice change on how to achieve that level. REF does not give a mandate or suggestion on timeframe for departments to move through the spectrum in 5 years.
Centralized Support & Accountability: A central office must provide oversight, resources, and technical assistance to all agencies.	Mentions being able to access The Office of Community Partnerships and Strategic Communications (OCPSC) as a state entity subject matter expert for trusted messengers, etc. and also working with tribal offices on tribal engagement but does not discuss centralized oversight and support for CE plans, etc.
Mandatory and Funded: Community Engagement (CE) Plans must be a required, annual, and publicly accessible part of every agency's work, backed by dedicated funding.	Highlights how one best practice for the commission was implementing collaboration with philanthropy to support community engagement activities throughout the state. Doesn't discuss this suggestion
Accessibility and Inclusion: Engagement must be designed to remove barriers (e.g., providing stipends, childcare, translation) and be accessible to people of all ages and abilities.	Takes the time to uplift moments of success in the area. Reference example: We have traveled to the Central Valley, Imperial Valley, Antelope Valley, and along the Central and North Coast, rather than hosting meetings exclusively in major metropolitan areas such as Sacramento or Los Angeles. The commission

CREC Recommendations	REF Analysis
	did this to reduce the travel burden on communities. In partnership with community-based organizations, the commission identifies language needs in the community, coordinates interpretation services, and collaborates with the community partner to translate materials. Examples of the way the REC did these things are great but they are not comprehensive best practices - would have liked for the REF to directly say these are best practices, every engagement plan needs to include/consider these and implement to the best of their ability.
Action, Not Extraction: The process must be designed to ensure community input leads to tangible action and policy change.	They hint at this through the 1-3 for the spectrum. However, there is no strong focus on tangible action and policy change. They indirectly discuss "non-extraction" efforts when they say they returned back to the communities to give an update on REC efforts but we know this is not the only non-extractive strategy. More discussion and recommendations are needed so that non-extraction is parlayed into action/practice/policy change.
REC recommends that Governor's/Legislature mandate Community Engagement Specialists by issuing a directive that every agency must have a dedicated staff member responsible for designing and implementing community engagementPlans.	Does not discuss
REC recommends designating a Central REC oversight Office (e.g., OCPSC) to manage CE efforts across all agencies until the ORE is established. This office will distribute resources and provide guidance.	State agencies and departments, as well as local jurisdictions can leverage the subject matter expertise of OCPSC, but doesn't recommend or mandate that OCPSC or other bodies should be responsible for central oversight.

CREC Recommendations	REF Analysis
REC recommends oversight Office/ORE Develop & Disseminate Official Guidance including templates, tools, and a clear definition of the "who, what, how, when, and where" for mandatory annual CE Plans.	Does not discuss this because they do not discuss central oversight body
REC recommends Legislature/Budget Committee Secure Dedicated Funding to remove restrictions and allow state funds to be used for stipends, childcare, translation, and other costs critical for inclusive engagement.	Does not discuss this
REC recommends an oversight office/ORE Launch a Public Tracking System for all agencies to post their CE Plans, progress reports, and opportunities for input, ensuring transparency and accountability.	Does not discuss this because they do not discuss central oversight body
REC recommends an oversight office/ORE Provide Technical Assistance & Training to state agencies to help them build capacity, design effective plans, and advance along the Spectrum of Engagement.	Does not discuss this because they do not discuss central oversight body, however, it is said that REC is responsible for giving government technical assistance
REC recommends the Governor's Office issue an executive directive formally tasking the OCPSC (or similar) with the interim central oversight role.	Does not discuss this
REC Recommend convening a working group with community-based organizations to begin drafting the mandatory CE Plan guidelines and templates.	Shows an example but not a directive. Government agencies and departments can also establish their own community advisory bodies to support community engagement work within their respective teams and agencies.
REC recommends CA Legislature conduct budget analyses to identify and advocate for the necessary dedicated funding lines for implementation.	Is that part of the implementation plan, where will this be? This recommendation and guidance is not included

Data for Equity

We see the objective of establishing infrastructure, standardized data processes, and a statewide equity index as transforming state government into a model of data-driven transparency and accountability, using both quantitative and qualitative data to identify disparities, measure the impact of policies, and direct resources to the communities with the greatest needs.

Overarching Coalition Analysis

- The REF (page 2) states that the Commission values Data and Information use by state government that utilizes disaggregated data, storytelling:, and equity indices and mapping
- Appendix section 1.8 (page 88) demonstrates the Commission's commitment to and the importance of understanding and using disaggregated data to inform government systems and processes.
- It does not connect the dots from disaggregated data to a strong recommendation or directive that will actualize a statewide data hub/index
- The REF's Data section needs directive recommendations. For example, the REF section on "gathering and using data to serve all Californians successfully," (page 22), the Commission states, "make data collection and disaggregation a collaborative process between researchers and community, engage and build relationships with community members early on to begin trust building and acknowledge concerns." This clause is a statement rather than a call to action with next steps for its audience, state and local governments and the legislature. Statements like this should be followed by recommendations, templates/frameworks to use, and implementation plans.

CREC Recommendations	REF Analysis
Mandatory Standards: Establish mandatory, statewide standards for data collection, disaggregation, and public reporting.	How alignment with standards will be evaluated and enforced? What will be the baseline data standard? Is there any example in CA as a preliminary guideline.One good place to examine and start is to uplift the Master Plan on Aging. It is the most comprehensive showcasing progress, goals and initiatives.
Transparency: Make all data publicly accessible through online dashboards and periodic reports.	What specific dashboards will be created? Will there be alignment / aggregation from local to state level? Again, there are hints at more transparency.

CREC Recommendations	REF Analysis
	However, giving an example like the Master Plan on Aging. There is a data dashboard, implementation tracker, updates and annual report, past reports, etc. There is even a local playbook.
Empowerment: Strengthen the state's central data office (ODI) to lead this transformation.	Draft identifies ODI as a source of standardization, but it needs to specifically call out and uplift ODI's leadership role.
Targeted Action: Use data to precisely identify geographic and demographic disparities to guide resource allocation.	Identifies the utility of geographic data, but does not essentialize it.
Holistic Data: Elevate the value of both quantitative data (numbers, metrics) and qualitative data (community stories, experiences) to provide full context.	Does highlight the importance of both qualitative and quantitative data, but would still want to see specific metrics called out.
REC recommends Gov office/Legislature Secure funding and authority to expand the Office of Data and Innovation (ODI), making it the central engine for data equity, technical assistance, and accountability.	Not identified in this draft; needs to be a clear call to action.
REC recommends ORE /ODI Adopt and train agencies on best practices for integrating community voice and storytelling into data products, using guides like Catalyst California's.	Some recommendations for training are identified
REC directly recommends creation of a California Equity Index that maps intersectional demographic data with key disparity metrics to identify high-need regions.	No call to action around a state equity index, just references to local efforts.

Also to note there is an example of some state Equity indexes. However, if there is going to be a reference it should focus on one that the state has actively engaged with like the Master Plan on Aging. |

CREC Recommendations	REF Analysis
Develop and recommend implementation guidelines for state agencies to measure and publicly report on the racial equity impact of their policies and programs	Some recommendations for guidelines are noted throughout
Recommend drafting & enacting legislation mandating statewide data collection, disaggregation, and public disclosure standards	No mandate identifiable