

To the California Racial Equity Commission and Staff:

On behalf of The Greenlining Institute, 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 present but serves as the very soul of this endeavor.

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

As you move into the finalization phase, our collective hope is that the Commission will lean into three guiding principles: **Be Bold, Be Directive, and Be Specific**. We offer the following comments in a spirit of partnership and shared commitment to actualizing this critical vision.

Be Bold: Own the Moment and the Mandate

The emergency facing Californians demands a framework that speaks with authority and clarity. We encourage the Commission to own this work, own the solutions presented, and lead the transformation by:

- Speaking with conviction, plainly stating, “These are the key actions agencies must implement and be held accountable for...”
- Enhance and strengthen the recommendation of the prioritized establishment of an Office of Racial Equity (ORE). Provide the actionable next steps, parties responsible, and policy pathway for an ORE. Equitable government transformation requires dedicated support, and an ORE is the essential structure needed to achieve the goals within this framework.
- Making a direct call to action to the Governor, the Legislature, department heads, and agency chiefs to issue directives, allocate budgets, and initiate mandatory changes to practice and protocol. For the Commission's goals to be operationalized, they must be resourced and required.
- Call for mandated public-facing data dashboards to provide residents with transparent, up-to-date snapshots of the state's progress toward its racial equity goals.
- Address the gaps in the Commission's purview, i.e. the reality that state government needs mandates and direction to take large-scale actions, and provide strong recommendations wherever needed, identifying the next steps, and parties of interest, while tying the framework's implementation and success to the Office of Racial Equity showing how it is needed to achieve long-term success and impacts that communities will feel and fulfill the Commission's mandates.

- Develop and require the use of a statewide racial equity analysis tool that state entities will use to assess past, current and future programs and policies for equity in the planning and impacts.

Be Directive: Connect the Values to Action

For state entities to implement this vision, they need clear, actionable directives. The final framework can be strengthened by:

- Mapping out clear phases and steps for implementation, moving from concept to practice.
- Recommending specific requirements, such as explicitly naming that, in order for the BET to affect agency transformation, all agencies must be required or mandated to complete the CA Budget Equity Tool for every budget change proposal and receive training on its use. The state budget is one of our most powerful levers for change.
- Identifying specific stakeholders (e.g., Governor's Office, Department of Finance, Office of Data and Innovation, Agency Equity Leads) and the precise actions they need to take.
- Defining what co-governance looks like in practice, providing concrete tools for agencies to evaluate their community engagement and move toward authentic power-sharing.
- Eliminate passive language and suggestions, language like "may" and "could." Use "Should", "must", "the commission strongly recommends", "the commission is committed to working with relevant parties to achieve x", "in order to achieve change, x action will be required of x agencies..."

Be Specific: Provide a Clear Roadmap

Adding specificity will transform the framework from a visionary document into an actionable playbook. We urge the Commission to:

- Detailed, broadly standardized plans are required for a house to be built. It does in fact require a manual; of course there are zoning requirements, and many other pieces that make sure houses are built safely and effectively, etc. State agencies may be able to decorate the house to reflect more nuanced aspects of their charge but will be unable to build something that adheres to racial equity principles without a manual.
- Racial inequality is where we see the most acute inequality in our society; that is why we *focus on race extensively though not exclusively*. Racial Equity is equity.
- Specify a time frame and concrete steps for the launch of the proposed Office of Racial Equity.
- Include a policy agenda with clear recommendations for the legislative changes needed to empower implementing entities.
- Provide strategic counsel on technical assistance, evaluation, and integration mechanisms.

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 [SB 17](#). Below is a summary of recommendations that remain critical to integrate in the current REF and are an example of actionable directives to achieve stated Commission goals. Specifically, we uplift the [national study I conducted in 2023](#) that recommends how best to build a framework for the State of CA. Many of the findings and best practices reported therein are found in the [Commission's Toolbox](#). The CA Racial Equity Coalition has 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](#) which set a remarkable standard for state advisory bodies to make actionable frameworks. And lastly, the State of Oregon developed a 2021 [statewide framework](#) for equity that outlines recommendations for each state entity with actionable next steps for addressing inequities from inside government.

Concise Recommendations for Operationalizing Racial Equity in California

To achieve its racial equity goals, California must move beyond aspirational statements and implement two core structural changes:

1. Recommend a mandated/required a Racial Equity Budget Tool (BET) to ensure public spending actively disrupts historical and present disparities.
2. Establish a permanent, empowered Office of Racial Equity (ORE) to build capacity, ensure accountability, and sustain efforts across all state government.

Actionable Recommendation 1: Implement a Mandatory Budget Equity Tool

Objective: Embed racial equity analysis into every stage of the state budgeting process to prioritize equitable investments.

Key Actions:

- Work with Department of Finance to develop a
- Standardized BET: Create a mandatory tool with questions focused on:
 - Alignment with state and departmental racial equity goals.
 - Identification of specific racial disparities to be addressed.
 - Analysis of who will benefit and who will be burdened, using disaggregated data.
 - Documentation of community input and power-sharing in decision-making.
 - Clear metrics for measuring racial equity outcomes.
- Require Universal Participation: Mandate that every state agency must complete a BET for all budget requests submitted to the Department of Finance (DOF).
- Integrate Co-Training: Implement mandatory "co-training" where:
 - Departmental staff receive training on budgeting processes.

- DoF budget analysts receive training on racial equity principles and how to review REBTs.
- Establish a Robust Review Process: Task DOF fiscal analysts, in partnership with racial equity practitioners, with:
 - Analyzing all BET submissions.
 - Providing iterative, constructive feedback to agencies to improve proposals.
 - Prioritizing budget requests that demonstrate a clear positive impact on equity.

Actionable Recommendation 2: Establish a Permanent Office of Racial Equity (ORE)

Objective: Create a central, resourced hub to lead, coordinate, and hold the government accountable for continuous racial equity progress.

Key Actions:

- Work with the Governor's Office and the legislature to establish a Permanent Office: Statutorily establish the ORE with a dedicated budget and staff of experienced racial equity practitioners.
- Empower the ORE with Key Functions:
 - Capacity Building: Develop and provide statewide racial equity training, including BET training and technical assistance.
 - Guidance & Tools: Create frameworks and resources for agencies to develop their own Racial Equity Action Plans.
 - Coordination: Convene department secretaries and racial equity leads to ensure alignment and share best practices.
 - Accountability: Measure, evaluate, and report on the progress of state agencies toward their racial equity goals.
 - Partnership with DOF: Co-develop and co-implement the REBT, and serve as a technical advisor to DOF for analyzing budget proposals.
- Build a Network of Practitioners: Direct ORE 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.

Finally, **we applaud the Commissioners' robust recommendations** in the [9.17.25 Klamath REC meeting](#). I would like to take this opportunity to uplift several that stood out and expand upon them.

- Sections of the framework need to have actionable recommendations that use directive language. Call out the role of state government, naming players and their roles, speak to how the commission and players work together, and names what it will really take to create a fair government.

- Think first and foremost about the state agencies who will pick up the framework and have to implement it. At present, they do not have what they need to know how to move forward.
- The Budget Equity Tool (BET) process still needs more precision and recommendations for success. For example, what are the next steps when a state agent *does* discover an inequity or disparity? What are the steps to closing the gaps and what is the intentional process that addresses this?
- Current legal constraints *do not* prevent the work and mandate of the Commission to create a framework for government to work equitably nor does it prevent the Commission from providing strong directives to state agencies.
- The Office of Racial Equity, as a pillar of key strategies for achieving the Commission's goals, requires a roadmap and an action plan to achieve it. One example of this could be:
 - "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.
 - 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.
 - 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."
- Create mechanisms and practices that demonstrate how the Commission brings the voices of the people in communities they engage with to the appropriate state government entity, and provide response and feedback to communities how their voice was heard and what will change.

In closing, we thank you again for your dedication and courage. This framework is a testament to the hard work of the Commission and its staff. By sharpening its focus on bold, directive, and specific language, 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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The Greenlining Institute