



September 24, 2025

California Racial Equity Commission

1400 Tenth Street

Sacramento, CA 95814

RE: Comment Letter – Draft Racial Equity Framework

To the Racial Equity Commission,

On behalf of Prevention Institute, I am pleased to share our comments on the Racial Equity Commission's draft Racial Equity Framework. Prevention Institute is a national nonprofit, headquartered in Oakland, working to build health equity and racial justice into key policies and actions at the federal, state, local, and organizational levels to ensure that the places where all people live, work, play and learn foster health, safety, and wellbeing.

At Prevention Institute, we envision a just and thriving society where all communities—especially those historically and intentionally marginalized—have the power, resources, and opportunity to lead healthy lives. We center community wisdom through deep relationships and collaboration with community-based organizations while also forging strong partnerships with government, philanthropy, and public health systems. We build bridges and power with our diverse partners to advance transformative policies and practices that accrue power to communities experiencing health inequities. Through this work, we dismantle structural racism and eliminate health inequities, creating lasting change that advances equity, justice, and collective well-being.

Through our research on [Countering the Production of Health Inequities](#), Prevention Institute conducted an analysis of the major U.S. laws—across multiple determinants of health (e.g., education, housing, health, employment, income and wealth, etc.)—dating back to the Dred Scott decision of 1857, which together shaped the inequitable social, physical, and economic conditions we experience today. We understand structural racism as a system of policies, social structures, and norms across institutions that operate as a system of power with multiple interconnected, reinforcing, and self-perpetuating components which result in racial inequities across all indicators for success. Through our analysis, our organization has recognized that without redressing race-based inequities that have, over generations, been embedded into the policies and practices that shape community environments and determine where resources and assets are distributed and who has access to them, we will not be successful in eliminating patterned differences in health outcomes between groups based on racial categories.

The California Racial Equity Framework is charged with compiling methodologies and tools that can be employed in California to advance racial equity and address structural racism.¹ We congratulate the Commission, Executive Director Dr. Larissa Estes, and the staff on the release of the draft Racial Equity

¹ [Executive Order N-16-22](#), 2022

Framework. This draft is a culmination of months of meaningful community engagement and dialogue meant to reflect the needs of California's racially diverse communities. Amidst a challenging environment for racial equity work, the Racial Equity Framework can stand as a beacon for dignity, equity, and justice for California. We offer the following recommendations with respect and humility, organizing our comments into overarching recommendations and suggestions for each section within the framework. In many ways, the framework is innovating a blueprint for racial equity that does not exist. Prevention Institute thanks the Commission and the staff for the opportunity to provide comment, and we stand ready to support the work ahead.

Overarching Recommendations

The framework has an opportunity to lay a foundation and roadmap for how government entities can integrate racial equity principles into government operations. While the framework contains a suite of applicable tools to begin assessment and redesign of operations to better California's racially diverse communities, the framework can better support users of this document by laying out a comprehensive process for how state government entities will apply the Framework in their work. There are bold recommendations that highlight innovative concepts, case studies, and tools that government entities can apply, but they require more synthesization and compilation into a clear process to be actionable within California's state government. Three mechanisms can be included in the Framework to make it more actionable, including:

1. Creating a comprehensive guide to support government entities in moving through assessment, analysis, redesign, and implementation of their operations across the domains of community engagement, data, budget equity, and government infrastructure as laid out in the framework.

For state entities to be able to take the framework and implement the Commission's vision effectively, they require clear and specific direction. We recommend outlining concrete activities and assigning clear roles to support government entities in moving from concept to action. This could take the form of a table summarizing each action recommendation within the framework, identifying who in state government can lead in carrying out that action, and identifying specific next steps for them to act.

2. Recommending a slate of policy recommendations to strengthen government accountability and transparency in implementing the framework, helping create the "enabling environment" for racial equity work in the state.

Policy recommendations can help the Governor and the Legislature use legislative levers to help make the framework more actionable and directive. The full use of the framework may require legislative empowerment, and there are strong examples of proposed legislation that require racial equity work to be done by state departments and agencies, one of which we describe on page 6 of this letter. Additionally, a slate of policy recommendations can help address structural and procedural barriers to integrating racial equity principles in government operations,

including, but not limited to, addressing the constraints of Prop 209, resourcing this work through the state budget, and making legislative requirements for the implementation of the framework.

3. Integrating the “Three Equity Objectives” to ground racial equity work in a set of objectives and outcomes that can guide the strategies and tools nestled in the Framework. The Three Equity Objectives provides a useful frame that identifies specific forms of equity, helping ensure that policies aimed at restructuring and redesigning government operations can identify how specifically they’re making progress towards racial equity. It is a frame we at Prevention Institute use in our own research, policy advocacy, and support of grassroots movements to advance health equity and racial justice.

The Three Equity Objectives

This frame can help assess whether government agencies are acting in a just and fair manner when it comes to delivering goods and services, making assessments of department budgets, building robust community engagement plans, and more.²

The three objectives are:

- *Procedural equity* refers to transparent, fair, and inclusive processes that provide additional opportunities for those who are disproportionately impacted. These values of transparency, fairness, and inclusion apply to who participates, how participants are engaged, and how input is valued. Procedural equity involves acknowledging imbalances in power and technical expertise that often exist when historically marginalized communities engage with public agencies in decision-making.
- *Distributional equity* means fair distribution of resources, benefits, and burdens, and prioritizes resources for communities experiencing the greatest inequities. Distributional equity is often the first thing people think about when they think about equity because it is the most quantifiable or tangible. Distributional equity is guided by quantitative and qualitative data and allocates goods, services, and other resources in a manner that creates fair opportunities for health and wellbeing for all.
- *Structural equity* addresses underlying structural factors and policies that gave rise to inequities and commits to correcting past harms and preventing future unintended consequences. While more difficult to measure than the other types of equity, structural equity is no less important. Structural equity exposes deep factors related to

² Yuen, T. et al. Guide to Equitable, Community-Driven Climate Preparedness Planning. Urban Sustainability Directors Network, May 2017. Accessed at:
https://www.usdn.org/uploads/cms/documents/usdn_guide_to_equitable_community-driven_climate_preparedness-high_res.pdf

power that perpetuate disadvantage within systems and then reverses these inequities through with some combination of new norms, policies and/or representation.

These overarching recommendations will strengthen specificity and direction in the framework, identifying *who* will be charged with implementing the framework and *how* they will do that. And importantly, offering policy recommendations to the Governor and the Legislature and grounding the framework in a frame like the Three Equity Objectives sets a foundation for the framework to be more directive and more specific about objectives and outcomes in the future.

Part 1- Building the Framework for Your Organization

Ground and Guide Government Entities in Rethinking Community Engagement

This section, focused on community engagement, power sharing, and walking through the community engagement toolkit, contains bold ideas that can help government strengthen its community engagement and input processes so that communities can have more say over how government serves them. We applaud the Framework for highlighting the importance of considering language, disability, and geographic access when engaging the public (page 14). Additionally, the inclusion of the concept of “shared governance” is a bold idea (page 15), it alludes to the role that communities closest to the problems government seeks to address can play in devising solutions and guiding the process. However, the bold ideas included in this section need to connect the dots to the “why” and the “how.”

For example, *why* is considering language, disability, and geographic access important to supporting robust and representative community engagement? How do government entities address these needs through the design of engagement processes? And why is shared governance an effective tool in ensuring government operations are aligned with community-defined needs? What sustainability, accessibility, and accountability considerations should government entities keep into account when building channels for shared governance, like a community advisory board?

Helping connect the dots to “why” and “how”, potentially through a comprehensive guidebook or manual, will support government entities in understanding the intent of meaningful community engagement, assessing existing engagement processes, and redesigning them to apply the principles and paradigms highlighted in this section. Additionally, this section could speak to the importance of a central, resourced entity in state government that can support all departments and agencies with designing robust and meaningful community engagement processes that move beyond “consultation” to “collaboration” and “defer to.” A central hub for technical assistance on how to design and implement equitable community engagement processes can help build a culture and norm around community engagement in government, making community engagement expected and required.

Gathering and Using Information and Data to Serve All Californians Successfully

Explicitly Tie Equitable Data Practices to Other Structural Recommendations Made in the Framework

We appreciate the inclusion of recommendations around data equity and disaggregation and would like to further underscore the importance of collecting both quantitative and qualitative evidence to understand the full picture of differential socioeconomic, political, and health conditions between racial groups. Investing in data collection that identifies the geographic and racial gaps in resources, opportunities, and/or outcomes and creates a nexus between identified gaps and policy solutions will aid both policymakers and program administrators in making informed decisions for legislation, budgets, and services designed to advance equity. The [California Healthy Places Index](#) (HPI) is a useful example of an evidence-based, peer-reviewed data source that can help policymakers and program administrators prioritize equity in their investments and operations. The HPI provides scores geographic tracts throughout California on metrics focused on socioeconomic, health, and racial justice indicators.³ A geospatial tool like the HPI can help government entities understand the intersectional factors that contribute to overall gaps and outcomes for communities across the state. Going further, a common data tool in state government that compiles data on community social, economic, political, and health outcomes and makes it accessible to the public can help ground government decisions in real community outcomes and indicators and promote accountability to the public.

Understanding Budgets and how it impacts Communities

Address Structural Inequities in the State Budget Process

While including equity questions within the Budget Change Proposal (BCP) process can help government entities be more intentional about leveraging their budgets more effectively to serve California's racially diverse communities, this section has an opportunity to address the structural inequities in the overall state budget process. For example, the state budget process can significantly strengthen accountability and transparency to the public. This section could include a stronger recommendation for a statewide budget dashboard that shows the public where state revenues are being invested in by geography, population, and department/agency to understand where investment inequities may exist. The inclusion of Catalyst-California's Los Angeles City Equity Index is a great starting point, but the Framework can go further by offering recommendations for which state department can lead the creation of a statewide index, and what the initial steps to begin to build one may be. A statewide equity index also alludes to the need for more data-driven decision making in the budget process. Policy recommendations focused on budget equity could make a clear case for data-driven decision-making in both the budget change proposal process and structural accountability and transparency in the budget overall. This section can more explicitly tie data recommendations around data disaggregation and data specificity to decisions on budgets.

Additionally, under a slate of policy recommendations, the framework could recommend policies that create more shared governance structure in government, for example, like a state budget advisory council, or the establishment of a participatory budgeting council that can help determine

³ Public Health Alliance of Southern California. California Healthy Places Index. <https://healthyplacesindex.org>. Published 2025. September 23, 2025.

recommendations for how the state budget should invest in communities most impacted by racial inequities.

Structures to Help Create a California where All Can Thrive

Recommend the Necessary Functions & Responsibilities for the Office of Racial Equity

We applaud the inclusion of the Office of Racial Equity (ORE) and the role it can play as a central hub of racial equity practice in state government. The section highlighting the ORE can add additional specificity around the role and responsibilities an ORE can play in supporting government entities in implementing the Framework. For example, language should be included to empower the ORE to conduct trainings and technical assistance, convene department leaders and racial equity leads to facilitate alignment and share best practices, and foster accountability by measuring, evaluating, and reporting on progress.

Make Policy Recommendations to Establish Legislative Requirements for Racial Equity Work

This section can recommend legislation that will motivate state government entities to utilize the tools and recommendations included in the Framework. A policy recommendation for the legislative establishment of the Office of Racial Equity can help create the necessary infrastructure for long-term racial equity work to be carried out. Additionally, implementing legislation can also help contribute to the formal adoption of the Framework. For example, this year the Legislature considered [AB 766](#) (Sharp-Collins), a bill that would require “each agency, department, office, or commission subject to the Governor’s authority to, for any strategic plans applicable and if feasible, develop or update [their] strategic plan to reflect the use of data analysis and inclusive practices to more effectively advance racial equity and to respond to identified disparities with changes to the organization’s policies, programs, and operations.” As of September 15th, 2025, AB 766 has passed out of the Legislature and is now on Governor Newsom’s desk to be signed or vetoed. AB 766 is an example of the kind of complimentary legislation that can help empower the Framework, mandating the use of its recommended strategies and tools by department and agency operations.

The Racial Equity Framework is a valuable opportunity to establish a whole-of-government approach, supporting departments and agencies to begin to assess their current operations’ ability to advance racial equity and work in service of communities experiencing persistent racial inequities. With each tool, procedure, and policy recommended in the draft, the Framework should clearly lay out how a government entity can take the recommended material, turn to their place of work, and begin to implement it. Help connect the dots, and be specific about the steps government entities can make in service of racial equity once they’ve read the Framework.

We thank the Racial Equity Commission for the opportunity to comment on the draft Framework, and we are happy to support the Commission and the staff in this journey to advance racial equity in state government.



Sincerely,

A handwritten signature in black ink, appearing to read "Vince Leus".

Vince Leus, MURP
Program Manager
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A handwritten signature in black ink, appearing to read "Juliet Sims".

Juliet Sims, MPH, RD
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A handwritten signature in black ink, appearing to read "Brianna Hodge".

Brianna Hodge
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