

To: California Racial Equity Commission
From: California Department of Aging
Subject: Racial Equity Framework Draft Public Comment Submission
Date: September 24, 2025

To the California Racial Equity Commission:

Thank you for the opportunity to provide comments on the draft Racial Equity Framework. We applaud the effort and tremendous resources gathered to develop this framework; it will be a valuable tool to help advance equity throughout California.

The California Department of Aging (CDA) is responsible for facilitating implementation of the [Master Plan for Aging \(MPA\)](#), which includes a focus on equity throughout the plan's Five Bold Goals. Additionally, CDA administers programs that serve older adults, adults with disabilities, family caregivers, and residents in long-term care facilities throughout the State. These programs are funded through the federal Older Americans Act, the Older Californians Act, and through the Medi-Cal program.

We appreciate the opportunity to provide input and request that the following feedback be taken into consideration during the revision process.

1. Initiative 52 in the Master Plan for Aging seeks to ensure that "...people of color, both older adults and people with disabilities are represented as a population of focus in the Racial Equity Framework."

Age tends to compound the impacts of a lifetime of discrimination.¹ As the Commission revises its framework, we recommend highlighting the importance of eliminating intersectional discrimination as well as age-based and disability discrimination. Including this focus in the framework will help meet the needs of older Californians and disabled Californians of color.

As an example, the COVID-19 pandemic demonstrated the impact of system inequities based on age, disability, and race, leading to more deaths in nursing facilities with greater proportions of residents of color and certain older Californians of color proportionally under-vaccinated. These trends occurred despite the state's ongoing commitment to an equitable recovery, signifying how deeply embedded these systemic inequities are. Therefore, we recommend consideration be given to proposing a framework that includes structural ageism and ableism inherent in our systems and that intersects with racism to impact communities of color in California and across the country.

¹ <https://justiceinaging.org/wp-content/uploads/2023/10/Fulfilling-the-Promise-of-Equity-for-Older-Adults.pdf>

2. Clarification: Please see the following recommendations for clarification in the Framework and Toolbox
- a. Framework
 - i. p.2: Key Tools and Strategies, under Community Engagement, bullet #3 – recommend including language about in-person and virtual engagement
 - ii. p.2: Key Tools and Strategies, under Data and Information Use, bullet #1 – recommend explicitly stating age as one of the lists (even though it says “other identities”). Age is important to point out as a data point because not all ages in California thrive equally and equitably.
 - iii. p. 15: second paragraph, reference to CDA/EACAD – recommendations: 1. Replace EACAD’s purpose: The purpose of EACAD is to advise the Administration on the implementation of the Master Plan for Aging (MPA) initiatives and deliverables to achieve equity outcomes for older adults, people with disabilities, and caregivers. 2. In the last sentence, replace EACAD with CDA, as CDA provides stakeholder advisory committees the accessibility documents in preparing their presentations. This is not just EACAD, but rather, CDA as whole.
 - iv. p. 16, second paragraph, reference to four-factor – the California Health and Human Services Agency (CalHHS) is releasing revised guidelines and includes a 5th factor. We recommend connecting with CalHHS to align language regarding the Language Access Plans.
 - v. p. 16, third paragraph, reference to five threshold language – recommend listing out the 5 languages (Spanish, Tagalog, Chinese, Korean and Vietnamese).
 - vi. p. 31, Adding Equity to Duty Statement box – recommend adding language to include valuing older adults and disabilities within the workplace.
 - vii. p. 32, Strategies to embed to Build Equity into Your Strategic Plan (ESRI, nd) – Under number 1, it states “eligible Californians”. Please clarify eligible populations, as it seems this concept would apply to all Californians.
 - viii. p. 33, last paragraph – It references the United Kingdom, racial equality impact assessment. Suggest clarifying how this equality impact assessment relates to our definition of equity.
 - ix. Overall recommendations – recommend reorganizing where Part 3 – Our Historic Journey with California is Part 1. This gives context into what this framework is and why it’s important.

b. Racial Equity Toolbox

- i. p. 75, 1.6 Department of Aging, Equity Advisory Committee on Aging and Disability General Best Practices and Rules for Creating and Accessible Document – this document is developed by CDA, not the EACAD. These guidelines are provided to the EACAD and other MPA stakeholder advisory committees to create their presentations to be accessible. Recommend changing the language to reflect that it's the work of CDA and not EACAD.

Thank you for your consideration of the above recommendations and areas of clarification. Thank you for the tremendous effort that went into developing this product and we look forward to release of the final version.