July 6, 2021

Submitted via https://www.regulations.gov/

To: Office of Management and Budget (OMB)

From: American Psychological Association (APA)

Re: Response to Advancing Equity Request for Information (RFI)

The American Psychological Association (APA), the leading scientific and professional organization representing psychology in the United States, with more than 122,000 researchers, educators, clinicians, consultants and students as its members, submits these comments in response to the RFI Methods and Leading Practices for Advancing Equity and Support for Underserved Communities Through Government Practices. This comment speaks to Area 1 of the RFI (“Equity Assessments and Strategies”); Area 2 (“Barrier and Burden Reduction”); and Area 5 (“Stakeholder and Community Engagement”). Our suggestions come from a broad representation of psychologists across the discipline and profession of psychology and APA subject matter experts.

Background EO 13985 and APA Response to the RFI

APA appreciates OMB’s increased focus on racial justice and equity issues and thanks the Biden Administration for the work already advanced in this area. APA welcomed EO 13985 and commends the Administration for steps it has taken to implement it. OMB issued the current RFI to obtain stakeholder input and information that could assist in efforts to implement EO 13985, issued by President Biden on January 25, 2021. The EO aims to promote equity and support for underserved communities that have been “systematically denied a full opportunity to participate in aspects of economic, social and civic life,” including LGBTQI persons, communities of color, persons with disabilities, religious minorities, people living in rural areas, and people living in poverty. In this response, we pay attention to mental health and well-being concerns federal agencies should consider. Our comments are organized as follows:

1. General
2. Area 1: Equity assessments and strategies
3. Area 2: Barrier and burden reduction
4. Area 5: Stakeholder and community engagement
5. Psychology based resources

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1 86 FR 24029
2 86 FR 7009
General Comments

Comments in this section apply across the RFI’s five areas. APA recommends:

- **Add older adults to the underserved groups named in the equity definition.** Older adults may experience ubiquitous ageism that negatively impacts their standing in society, access to services, and ability to fully participate in life. Services are often not designed in ways that facilitate older adults’ ability to use them. Further, many older adults live in poverty and older adults from underrepresented populations are more likely to experience inequality.

- **Address stigma and distrust in the federal government.** In general, agencies providing services to underserved communities must contend with stigma and distrust of Federal agencies and programs. Specific ways to overcome these barriers might include psychological science-informed outreach and relationship building with the community, ensuring staff diversity, and confronting racial microaggressions (June, 1986; Hingwe, 2021).

- ** Adopt an intersectional approach to equity assessments.** Individuals within communities are multifaceted, with several different identities and social categories. The complex interaction of these identities plays a part in determining inequities. Consider being more flexible in collecting information on multiple identities and disaggregate data so that within-group disparities can be revealed (Bailey, 2019; Christoffersen, 2017).

**Equity Assessments and Strategies**

*Regarding promising methods and strategies for assessing equity in internal agency practices and policies:*

- **Utilize assessment tools validated in the populations being assessed.** Similarly, methods for administering assessments should be tailored to the unique needs of each population to ensure adequate representation of the target population.

- **Apply a population health approach to health and human services delivery.** A population health approach offers a more proactive way to address the mental health of individuals and communities because it recognizes that our mental health exists on a continuum and emphasizes that it is critical to meet people wherever they are on that continuum, not passively waiting for them to reach a crisis before intervening (APA, 2021).

- **Fund organizations to conduct community needs assessments.** Extend grants to organizations with strong community ties that can solicit direct feedback from those who access care or receive services to identify what obstacles were encountered, solicit suggestions for streamlining, and assess the impact of their seeking services.

*Regarding community engagement or feedback from underserved individuals with lived expertise on a given policy problem be integrated meaningfully in an agency's use of equity assessment methods?*

- **Involve targeted community stakeholders from the beginning of assessment processes.** This includes identification of variables and the design of assessment strategies. For example, stakeholders can be involved in the identification of outcomes to assess and assessment methods, interpretation of collected
data, and the integration of those data into policy development. Community-Based Participatory Research principles may be helpful in informing the integration of stakeholders into this process (Cacari-Stone, 2014). For older adults, identify underserved community members to serve on state, local, federal task forces and working groups; seek out community gatekeepers; better understand use of the public comments process and who participates; identify innovative models for seeking public comments among underserved populations (e.g., public comment listening sessions as senior centers); improve education on civic engagement (Dibartolo, 2003).

- **Use assessment tools standardized in linguistically and culturally diverse communities.** Understanding the limitations and lack of potential applicability of a measure when differences in language and cultural experience are present is an important example of how psychologists may apply their knowledge. Language and communication within a sociocultural context are relevant to the research enterprise. A comparison of research measures across cultures can introduce problems and fail to capture the nuances associated with the participating culture and community (Clauss-Ehlers, Serpell, & Weist, 2013; Wagner, Hansen, & Kronberger, 2014; APA, 2017). Qualitative methods of assessment, in addition to quantitative methods may be vital to ensuring the voices of underserved communities are comprehensively captured. Integrating qualitative and quantitative data so that one informs the other may provide both a broad and in-depth view of the needs of underserved populations.

- **Recognize that inequity occurs at structural and organization levels, not only at the level of individual agency staff.** Federal agencies were created in an historical context in which White Americans were afforded more rights, privileges, and opportunities than non-White Americans, and as a result may unintentionally replicate racial inequality. Understanding this context is critical to advancing equity for all Americans, recognizing how their specific agency has ‘racialized’ outcomes and how inequities are built into their system is important (Ray, 2019). Appropriate training would be designed to help teams assess inequity and how to implement solutions at a structural, organizational level. Another useful area of training for effective equity strategies would be training to build structural competency. Structural competency maintains belief in the relevancy of building competency not only at the individual level (to perform one’s role adequately) but also to create and engage in structural changes that might create long term systemic changes within larger systems. The technique is being explored in psychology (Ali & Sichel, 2014) as well as in other disciplines (Chambers & Ratliff, 2019). See APA multicultural guidelines (APA, 2003).

**Barrier and Burden Reduction**

*Regarding communities which experience multiple, cumulative barriers and are disproportionately burdened by specific administrative processes or requirements: What data, tools, or evidence are available to show how particular underserved communities or populations disproportionately encounter these barriers?*

- **Respond to needs of those living in low-resource environments.** Individuals living in low-resource environments may have a greater likelihood of receiving lower-quality care from health services and greater barriers to access (Jha, Orav, & Epstein, 2011; Schoen, et al., 2013). This broad spread of effect is tempered by the fact that low-income and discriminated groups, and even middle-income individuals from those same groups, are more likely than low-income Whites/White Americans to live in low-resource areas. This means that the vulnerabilities created by life in low-resource environments are much more likely to affect disadvantaged and discriminated identity groups (Williams & Jackson,
2005). The greater exposure to crime and violence and limited access to quality school systems creates additional and often lifelong vulnerabilities for diverse populations.

- **Accelerate investment in neighborhoods and built environment.** Federal agencies should take steps to support local, state and regional efforts aimed at to improving the infrastructure of communities that have been underserved or marginalized. Geographic place is a powerful predictor of conditions for health. Communities directly and indirectly shape health through environmental exposures; access to safe recreational facilities; access to high-quality schools; the presence of crime; and the like. Unsafe neighborhoods prevent children from playing outside and older adults might feel like vulnerable targets. Lack of or inadequate public transportation can be problematic for those living in poverty or with limited economic resources, creating barriers to healthcare or educational and economic opportunities. Because of residential segregation and subsequent disinvestment, these kinds of neighborhood attributes are often magnified in highly segregated communities.

**Stakeholder and Community Engagement**

This section provides recommendations federal agency should consider in developing strategies to engage members of communities that have been historically underrepresented in the federal government and underserved by, or subject to discrimination in, federal policies and programs.

- **Build systems for continuous community feedback.** Engage and foster relationships with community stakeholders by giving them a seat at the table. Consider developing community oversight boards or committees to provide recommendations and guidance.

- **Foster trust and social cohesion.** Psychological research has shown that communities with a high level of trust and engagement around common challenges tend to have better overall health and resiliency after disasters. Psychologists can help build social cohesion by supporting community dialogues that bring people together to improve their ability to identify the systems, policies and other factors that can create lasting change (APA, 2020).

- **Acknowledge trauma.** Positive change in addressing these historical trauma starts with willingness to engage in open and honest dialogues on these difficult topics. Mental health issues that need to be discussed concerning implicit biases, ableism and racism are complex and multifaceted. Accordingly, they will require multifaceted and evidence-based approaches that embrace diversity, equity and inclusion and eradicate the negative stigma of mental illness. To be effective, these approaches must be fully researched and sufficiently resourced. Federal agencies should prioritize these considerations in their budget and appropriations requests.

- **Consider consulting these capacity building and training resources concerning sexual and gender minorities.**
  - Understanding the Well-Being of LGBTQI+ Populations A Consensus Report of the National Academies (https://www.nap.edu/read/25877/chapter/1)
  - Program leadership of the George Washington University’s Graduate Certificate Program LGBT Health Policy and Practice (https://lgbt.columbian.gwu.edu/)

- **Adopt a lifespan approach to equity.** People may experience inequities at a greater or lesser extent as they age depending on the issue. Federal agencies should specifically identify older adults, as an example, when operationally defining equity in underserved communities, as older adults represent a
unique population with shared experiences. Moreover, there is a growing literature on ageism and its effects on the health and well-being of older adults (Brothers & Diehl, 2017; Levy, 2017).

APA Resources

Psychologists are deeply engaged in research, training, and interventions, and advocacy to advance racial justice and equity. Although some of these materials are geared towards the discipline of psychology, federal agencies may find psychology-informed concepts and approaches to achieve racial justice and equity useful.

- Bias, Discrimination, and Equity Resources. Information, resources, and support for behavioral and social scientists, advocates, activists, and community serving practitioners addressing health and race disparities during and post-OVID-19. https://www.apa.org/topics/covid-19/equity-resources

- Highlighting the value of using psychological science to combat racism and inequities in the scientific workforce. APA identifies several factors causing disparities in the scientific workforce and offers evidence-based solutions in response to a request for information from the National Institutes of Health. https://www.apaservices.org/advocacy/news/value-science-combat-racism


- APA Guidelines for Psychological Practice for People with Low-Income and Economic Marginalization. (2019). These guidelines provide concrete actions that psychologists can take when working with Low-Income and Economically Marginalized (LIEM) individuals and deepens the conversation surrounding how to provide appropriate care for people in different economic positions. https://www.apa.org/about/policy/guidelines-low-income.pdf


References


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