



# Defining Equity

A report on best practices and an analysis of common themes

Equity Strategy Program  
Metro

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## About Metro

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## I. INTRODUCTION

This report was completed in support of Metro's Equity Strategy Program and was designed to inform the development of Metro's agency definition of equity. It draws from cognitive- and opinion-based research on how people make sense of and understand equity as well as from local and national organizations' definitions of equity. This report also includes a preliminary review of how Metro's regulatory requirements relate to both the academic and practical understandings of equity.

Fifteen definitions of equity from local and national organizations and agencies were analyzed for main themes. Eleven key themes emerged from the definitions' contents, many of which appeared repeatedly throughout the definitions. For example, the most frequently mentioned theme was a unifying narrative including the terms, "we," "all," and "everyone," referring to our shared interests, our shared future, and our shared responsibilities. Key terms and themes also included: prosperity, access, barriers, intentionality, ability, means, ends, well-being, benefits, and burdens.

The three most commonly found themes in organizational definitions (everyone, prosperity, and access) and two main themes recommended in the research (barriers and intentionality) were chosen for further examination. Findings from opinion- and cognitive-based research further illustrated the importance of these themes. Consideration of federal regulatory requirements showed how the themes aligned with and supported the language and intention of Title VI of the Civil Rights Act, Title II of the Americans with Disabilities Act, and Environmental Justice and Limited English Proficiency executive orders.

In the Equity Strategy Program, and in this report, equality and equity are recognized as different concepts. Equality conveys ideas of fairness and sameness, the goal of which is for everyone to have equal conditions or equal resources. Equity, on the other hand, takes into account historical injustices that certain communities and groups face and differences in needs between groups.

The report is organized as follows. The first section identifies **best practice** models for understanding equity, essential components of a definition, and a framework by which to communicate about equity. These objectives were met by drawing from academic and opinion-based research on how people make sense of and understand equity. The second section provides **context** on Metro's federal regulatory requirements to ensure Metro's definition of equity aligns with and supports these requirements. The third section presents the analysis of **existing definitions** of equity. This examination of key concepts and terms allows this work to benefit from the progress that others have already made. The fourth and final section synthesizes the background research presented in this report and includes four recommendations for constructing a strong definition of equity.

## II. BEST PRACTICES

Defining equity is a crucial step in the Equity Strategy Program's goal to design a strong and lasting approach for advancing equity. This approach will provide the structure and guidance for all Metro staff to consistently advance equity across the agency. To support this goal, this section presents best practices of (1) a model for understanding equity, (2) essential components of a definition, and (3) a framework by which to communicate about equity. This information is drawn from academic and opinion-based research on how people make sense of and understand equity.

### **Model: Dimensions of Equity**

Advancing equity requires an understanding of the ways in which our systems and institutions affects people's lives. While this is a complex undertaking, one organizing model outlines three dimensions that help frame this process: interpersonal, institutional and structural.

Often, efforts to address inequities have focused on individuals or individual acts. However, institutional and structural inequities lead to disparate outcomes for individuals and communalities, even if they are unintended and cannot be linked to an individual's acts or intent. Understanding these distinctions is critical for identifying the parameters of Metro's role as an institution in advancing equity.

The following example, while focused on discrimination, provides a brief summary of three different dimensions or scales at which we can also think about our equity efforts.

When people think about discrimination, they typically think about **interpersonal discrimination**, such as a high school teacher who only encourages white students to take advanced classes. Interpersonal discrimination is also called individual discrimination, and occurs at a person-to-person level.

**Institutional discrimination**, on the other hand, refers to the policies, practices, and procedures that lead to adverse outcomes and conditions for certain groups, while benefitting others, often unintentionally. One example of this is the Interstate Highway Act of 1956, a large-scale public works project that used federal financial assistance. It opened up new opportunities for middle- and upper-class families to migrate out of central cities to suburban housing. Meanwhile, urban communities that remained were surrounded by massive highway construction, which often resulted in the loss of financial and social assets.<sup>1</sup> This seemingly neutral program exacerbated already existing inequalities.

**Structural discrimination** refers to the interplay of policies, practices and programs of differing institutions which leads to adverse outcomes and conditions for some communities and to the benefit of others, even if unintentionally. While typically neutral in intent, this interplay has a differential and harmful effect on members of certain groups. An example of a classic cycle of structural discrimination can be seen between the fields of employment, education, and housing: education inequity denies individuals the credentials

they need to get good jobs, employment discrimination denies individuals the income they need to ensure stable housing, and housing discrimination denies individuals the ability to access schools that provide a strong education.<sup>2</sup>

The Race and Social Justice Initiative (RSJI), Seattle’s commitment to ending institutionalized racism in City government, uses this model to discuss their role as an institution in eliminating racial disparities and achieving racial equity. RSJI states that institutional racism is the root cause of racial inequity. “To achieve long-term, systemic change, RSJI focuses on institutional and structural racism. Civil rights laws and remedies have helped to address individual racism, but they have been less effective on the underlying systems that maintain racial inequity and the denial of equal opportunity.”

While addressing individual and structure inequities are important, Metro’s definition needs to provide guidance for advancing equity at the institutional level.

Below are definitions of interpersonal, institutional, and structural discrimination.<sup>3</sup>

	Definition
<b>Interpersonal</b>	Pre-judgment, bias, stereotypes or generalizations about an individual based on their race, ethnicity, gender, sexuality, age, ability, class, or other group membership.
<b>Institutional</b>	Policies, practices, and procedures that work to the benefit of individuals in certain groups to the detriment of people in other groups, usually unintentionally or inadvertently.
<b>Structural</b>	The interplay of policies, practices, and programs of differing institutions which lead to adverse outcomes and conditions for certain groups that occurs within the context of inequitable historical and cultural conditions.

### Content: Components of the Definition

Although Metro’s focus is to develop a definition of equity, recommendations from similar work are applicable to Metro’s effort. For example, Anat Shenker-Osorio provides helpful recommendations for developing a definition of inequality. In her investigation, she analyzes the terms and concepts used during interviews with 19 leading thinkers on the topic of inequality as well as materials from progressive and conservative organizations, academic writing, portrayals of inequality in traditional and new media, and campaign materials on marriage equality. Her research is the first of its kind and is cited throughout this report. She argues that a definition of inequality must include, at minimum:

- Intentionality
- Detectability
- Alterability
- Unfairness

- Not inevitable

In other words, inequality is a process of deliberate action, caused by unequal conditions, that is measurable, changeable, and avoidable.<sup>4</sup>

These essential components of a definition of inequality can provide guidance for a definition of equity, and three of these components are best-suited for translation to equity work: **intentionality, detectability, and alterability**. Unfairness relates more closely to ideas of equality than to equity, the difference between which is discussed above. A positive message around equity would incorporate possibilities for growth and change, thereby conveying that inequity is alterable. The concept of intentionality is expanded upon in the third section as a key theme in existing definitions. It is recommended that these three components inform Metro's effort to define equity.

### **Process Tool: Message Framework**

How can Metro ensure a clear and comprehensive definition of equity? In addition to the components above, it is also recommended that the Metro's equity definition be developed using the following components as a process guide: values, vision, challenge, opportunity, and response. These components emerged out of national communication research and were consistently addressed in the existing definitions included in section IV of this report.<sup>5</sup> Ensuring Metro's equity definition addresses these components will help provide a clear and concise frame for the broader context of Metro's equity strategy work program.

Leading with **values** sets the tone for the rest of the communication and motivates the audience to engage with the content of the message. It can include the big ideas that are at stake, such as opportunity, prosperity, justice, protection, and the common good.

Next, the **vision** component is aspirational and inspirational and gives people a sense of what is possible and why. It communicates a sense of purpose and the goals that drive the need for change.

The **challenge** statement addresses the question, "what is the problem?" This statement should communicate the problem in a way the helps the audience see the systemic nature of the problem, rather than narrowing the conversation to an individual level. This will help ensure the response provides systemic solutions.

The **opportunity** statement addresses the question, "What is at stake for everyone in your community if it is not addressed?" Its goal is to motivate public will and public action by articulating our interconnection and interdependence, and by highlighting the systemic, rather than individual, nature of the problem.

Lastly, the **response** component answers the questions, "What must be done? And, how is this possible?" Solutions that are prominent, pragmatic, and achievable will convey the steps that can be taken to address the challenges we face and to take advantage of new opportunities.<sup>6</sup>

Metro’s current framing for the equity program builds on these components and are presented below.

	Meaning	Example
<b>Values</b>	Values that underpin the challenge and the proposed solution. Answers the question, “Why does it matter?”	We all want a region that provides jobs, a thriving economy, good transportation, a healthy environment and nature nearby.
<b>Vision</b>	Our common goal. What we all want as a result of solving this problem and implementing this solution.	Our region is stronger when everyone has access to the benefits of safe neighborhoods, a sense of community, good health, financial security, and clean air and water.
<b>Challenge</b>	Brief and easily understandable statement of the problem to be addressed.	In spite of progress, our communities have seen growing disparities in racial equality and income, jobs, home ownership, educational achievement, and health.
<b>Opportunity</b>	What is at stake for the community, and why everyone should care about and see themselves in this problem.	As the demographics of our region change and the population grows, we have an opportunity to get ahead of the disparities that are barriers to a thriving, prosperous region.
<b>Response</b>	Clear, specific statement of the solution as well as who will need to work together to make it come to pass.	Bringing equity to the forefront of our work can help ensure a thriving, prosperous region by creating a place where everyone has access to the opportunities that provide the quality of life for which our region is known.



### III. CONTEXT: Federal Regulatory Requirements

Metro, as a recipient of federal grants, is required to ensure that agency policies, practices, and procedures are in compliance with federal regulations. It is the goal of the Equity Strategy Program that Metro’s definition of equity aligns with and supports these regulatory guidelines.

**Title VI** of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Federal Transit Administration recipients are further prohibited from any action or inaction, intentional or unintentional, that results in or perpetuates discrimination based on race, color, or national origin. EPA emphasizes the importance of meaningful public involvement in decision-making processes through their Title VI requirements.

In 2000, discrimination based on English language proficiency (**Limited English Proficient**) was added to Title VI to supplement the prohibition against national origin discrimination. The US Department of Transportation requires its recipients to ensure meaningful access and language services for LEP persons, such as public transportation passengers and persons living in areas affected or potentially affected by transportation projects.

**Environmental Justice**, an executive order signed in 1994, calls for the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income. It affirms the need to avoid, minimize, and mitigate disproportionately high and adverse public health and environmental effects on low-income and minority populations.

**Title II** of the Americans with Disabilities Act applies to all activities of state and local governments, regardless of whether they receive federal assistance. It requires agencies to ensure that their programs are readily accessible to and usable by individuals with disabilities.

See Appendix A for a list of definitions of regulatory key words and concepts.

Regulation	Key words and concepts	Definitions and agency-specific priorities
<b>Title VI of the Civil Rights Act of 1964</b>	<ul style="list-style-type: none"> <li>Discrimination</li> <li>Disparate impact</li> <li>Disparate treatment</li> <li>Disproportionate burden</li> <li>National origin</li> <li>Predominantly minority area</li> <li>Meaningful access</li> <li>Meaningful public</li> </ul>	<p><b>Title VI</b> prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance.</p> <p><b>FTA:</b> Under DOT’s Title VI regulations, recipients of Federal financial assistance are prohibited from, among other things, using criteria or methods of administering its programs which have the effect of subjecting individuals to discrimination based on their race, color, or national origin.</p> <p><b>EPA principles:</b></p> <ol style="list-style-type: none"> <li>1. All persons regardless of race, color or national origin are entitled to a safe and healthful environment.</li> </ol>

	<p>participation</p> <p>Early, preventive steps</p>	<ol style="list-style-type: none"> <li>2. Strong civil rights enforcement is essential in preventing Title VI violations and complaints.</li> <li>3. Enforcement of civil rights laws and environmental laws are complementary, and can be achieved in a manner consistent with, sustainable economic development.</li> <li>4. Early, preventive steps are strongly encouraged to prevent potential Title VI violations and complaints.</li> <li>5. Meaningful outreach and public participation early and throughout the decision-making process is critical to identify and resolve these issues, and to also assure proper consideration of public concerns.</li> </ol>
<p><b>Limited English Proficient (LEP) Persons Executive Order 13166</b></p>	<p>Limited English Proficient (LEP) Persons</p> <p>Meaningful access</p>	<p><b>DOT:</b> Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities.</p> <p>Recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.</p>
<p><b>Environmental Justice Executive Order 12898</b></p>	<p>Adverse effects</p> <p>Fair treatment</p> <p>Low income</p> <p>Low income populations</p> <p>Meaningful involvement</p> <p>Minority</p> <p>Minority populations</p> <p>Full and fair participation</p>	<p><b>Executive Order 12898</b> requires those who receive federal assistance to incorporate into their cost-benefit analysis a meaningful consideration of possible disproportionate adverse environmental and health impacts on minority and low-income populations.</p> <p><b>FTA</b> environmental justice guiding principles:</p> <ol style="list-style-type: none"> <li>1. To avoid, minimize, and mitigate disproportionately high and adverse effects.</li> <li>2. To ensure full and fair participation by all potentially affected communities.</li> <li>3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.</li> </ol> <p><b>EPA</b> defines environmental justice as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of laws, regulations, and policies.</p>
<p><b>Title II of the Americans with Disabilities Act (ADA)</b></p>	<p>Disability</p> <p>Readily accessible</p>	<p>Agencies shall operate their programs so that, when viewed in their entirety, they are readily accessible to and usable by individuals with disabilities.</p> <p>Title II extends to all activities of state or local government, regardless of whether receiving federal funds.</p>

#### IV. ANALYSIS OF THEMES IN EXISTING DEFINITIONS OF EQUITY

Metro's agency definition of equity can be informed by other programs', agencies' and organizations' definitions of equity. Fifteen definitions were reviewed for main themes; most of the definitions included in this report come from organizations or agencies in the Portland Metro region, however a few are from national organizations or agencies. Terms or phrases (e.g., "barrier") as well as implicit mention of the same theme (e.g., "policies and practices that marginalize") were coded and analyzed.

Terms and concepts used to evaluate the definitions include: Shenker-Osorio's five essential components of a definition of inequality (intentionality, unfairness, detectability, alterability, and not inevitable), components of the process guide that emerged from the national communications research (values, vision, challenge, opportunity, and response), and the three dimensions of equity (interpersonal, institutional, and structural). Finally, the content was analyzed using 11 terms and concepts that emerged from the definitions themselves. See Appendix B for a summary table of the themes, as they appear in each of the definitions.

An example of each of the terms that emerged from existing definitions is provided below:

**Everyone** is unifying theme and includes the terms "we," "all," and "everyone," and the concepts "shared fate" and "shared responsibility."

↪ *All communities need the ability to shape their own present and future.*

**Prosperity** includes "prosperity," "success," and "potential" and refers to people's and communities' ability to reach their goals and ideals.

↪ *All people are able to achieve their full potential.*

**Access** refers to increasing or ensuring people's ability to gain entry to the opportunities necessary for their success and well-being. It includes concepts such as "full and equal access," "disproportionate access," "access to opportunities," and "increasing opportunities."

↪ *Equity is when everyone has access to the opportunities that enable them to attain their full potential.*

**Barriers** refers to removing the external constraints that hold people back from achieving their goals. It includes concepts like "eliminating barriers" and "free of bias and barriers" to opportunities.

↪ *All people are afforded full and fair access to all opportunities and benefits, free of bias and barriers.*

**Intentionality** refers to the concept that equity requires deliberate action to eliminate disparities. Phrases like "create the conditions" and "focused societal efforts" convey that an intentional strategy is needed to advance equity.

↪ *Creating an equitable region requires the intentional examination of policies and practices.*

**Ability** refers to individuals' and communities' agency in meeting their needs, and to the capacity that we have to change inequitable systems.

↳ All communities need the *ability* to shape their own present and future.

**Means** indicates where equity is defined as a process rather than a goal.

↳ Equity is the *means* to healthy communities.

**Ends** indicates where equity is defined as a goal or an ideal rather than a process.

↳ Equity is an *end* that benefits us all.

**Well-being** refers to individual, community, or society overall wellness.

↳ The health, safety and *well-being* of all individuals are maximized.

**Benefits** refers to the positive impact of programs and policies on certain groups at the expense of other groups, and the need to ensure that all people and communities are advantaged equitably.

↳ All communities experience the *benefits* and share the costs of growth and change.

**Burdens** refers to the disproportionate negative impacts of programs and policies on certain groups.

↳ All benefits and *burdens* are shared and bias-free.

Three key themes were mentioned most frequently in organizations' definitions of equity: everyone, prosperity, and access. In the next section, these three concepts and two others (barriers and intentionality) are expanded upon. Barriers and intentionality are also examined in depth because they were prominent in the research on how to talk about equity and in the language used in Metro's federal regulatory requirements.

In this section, each of the five themes is illustrated with an existing definition of equity, connected to the cognitive- and opinion-based research, and linked to the regulatory requirements. The definitions chosen to illustrate the themes are not necessarily stronger than others, but simply provide context for the findings. Multiple themes can be seen in each definition; notice the repetition of themes among the examples provided.



## Theme 1: Everyone

A unifying narrative, including the terms “we,” “all,” and “everyone,” was the most widely used concept and was included in 12 of the 15 definitions. Definitions referred to our shared fate, our interdependence, and our shared responsibility, or the belief that we all have roles in changing systems of inequality. For example, this theme is repeated multiple times in Northwest Health Foundation’s definition of equity<sup>7</sup>.

**We have a shared fate**—as individuals within a community and communities within society. **All communities** need the ability to shape their own present and future. Equity is both the means to healthy communities and an end that benefits **us all**. Equity requires the intentional examination of systemic policies and practices that, even if they have the appearance of fairness, may, in effect, serve to marginalize some and perpetuate disparities. Working toward equity requires an understanding of historical contexts and the active investment in social structures over time to ensure that **all communities** can experience their vision for health. (emphasis added)

--Northwest Health Foundation

Research shows that a dominant framework for understanding inequality is that it is an individual issue rather than a population-level or group-level issue. The dominant discourse talks about inequality in terms of gaps, divides, or canyons, as if we have two separate economies.<sup>8</sup> However, Fassia and Bresette argue that a unifying frame provides an alternative to the idea of separate and competing fates and to the belief that equity policies must come at the expense of other groups. Instead, this new frame facilitates conversations about communities, illustrating our common goals of opportunity and moving us forward together. “We are stronger when we tackle our challenges together.”<sup>9</sup>

This narrative has been shown to be a successful strategy for building public support. A public-opinion poll conducted in Oregon found that a higher percentage of respondents consistently agreed with unifying statements than with those that mentioned differences. For example, 81 percent of respondents agreed with the statement, “We need to reach all pregnant women with information, education and health care.” Agreement dropped to 64 percent when respondents were asked the same statement with an additional caveat: “...all pregnant women regardless of immigration status...” Likewise, 86 percent of respondents agreed that, “It is only fair that everyone should have access to the health care that they need to be healthy,” whereas 78 percent agreed with reducing “the barriers faced by rural Oregonians to getting and staying healthy.”<sup>10</sup>

However, John A. Powell, Director of UC Berkeley’s Haas Institute for a Fair and Inclusive Society and former Executive Director of the Kirwan Institute for the Study of Race and Ethnicity, argues that universal programs are likely to exacerbate inequalities. He encourages the use of “targeted universalism”, which challenges the belief that universal strategies will help achieve universal goals and instead proposes targeted strategies to achieve universal goals. For example, the implementation of universal health care could worsen health disparities in poor communities that already have disproportionate access to

decent health care, such as a lack of facilities or medical staff. Increased demand in middle- and upper-class communities would likely draw medical professionals, thereby reducing access and quality of care in poor communities.<sup>11</sup>

### *Regulatory Context*

Title VI and Environmental Justice requirements also use this unifying theme. One of FTA's EJ principles is "to ensure full participation by all potentially affected communities"<sup>12</sup> and EPA defines EJ as "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income."<sup>13</sup> However, in general the regulatory requirements focus on specific populations: Title VI prohibits discrimination on the basis of race, color, national origin, and English language proficiency; EJ seeks to prevent disproportionately high adverse effects on minority and low-income populations; and Title II of the Americans with Disabilities Act requires that programs are readily accessible to and usable by individuals with disabilities.

## Theme 2: Prosperity

Concepts related to prosperity were the second most commonly mentioned theme in organizations' definitions of equity. Also including the terms “potential,” “thrive,” and “success,” this theme was found in 11 of the 15 definitions considered, and was more frequently used in relation to individuals rather than to society as a whole, with the exception of the excerpt below. Coalition for a Livable Future's definition of equity<sup>14</sup> repeatedly refers to this theme.

We all have a shared fate and a shared responsibility —as individuals within a community and communities within society. Our region's future depends on the **success** of all of its populations, but disparities in the distribution of resources and opportunities create imbalances that disadvantage some communities and advantage others. To create **a prosperous region**, we must ensure that everyone in our region benefits from the opportunities the region provides so that we are all **able to thrive**.

Building an equitable region will benefit us all by creating a stronger, healthier, and more sustainable community. Equity is not just a moral imperative – it is an economic one. As our region becomes more racially, ethnically, and age-diverse, **our shared prosperity** depends on our ability to create conditions that will **allow everyone to flourish**. Just as the sustainability of our economy depends on a regional strategy, our efforts to increase equity must also be regional in scope.

In an equitable region:

- All people have access to the resources necessary for meeting their basic needs and advancing their health and well-being.
- All people have the power to shape the future of their communities through public decision-making processes that are transparent, inclusive, and engage the community as full partners.
- All communities experience the benefits and share the costs of growth and change.
- All people are able and have the opportunity to **achieve their full potential and realize their vision for success**.

Inequities are not random; they are the results of past and current decisions, and they can be changed. Creating an equitable region requires the intentional examination of policies and practices (both past and present) that, even if they have the appearance of fairness, may, in effect, serve as barriers to perpetuate disparities. Working toward equity requires the prioritization of policies, infrastructure, and investments to ensure that **all people and communities can thrive** – regardless of race, ethnicity, income, age, gender, language, sexual orientation, ability, health status and other markers of identity. (emphasis added)

-- Coalition for a Livable Future

The prosperity narrative parallels work by Dr. Manuel Pastor, who argues that inequality hinders economic growth. For example, by failing to fully invest in the education of children of color, we are not preparing the future workforce and leaders for the jobs and roles of tomorrow.<sup>15</sup> Additional research shows that societies with higher social equity have more rapid and sustained economic growth and are more resilient to external shocks.<sup>16</sup> Social indicators show similar trends: people in more equal societies are less likely to use illegal

drugs, to be imprisoned, to experience mental illness, and to experience interpersonal violence. People in more equal societies also live longer and have more social mobility.<sup>17</sup>

Research conducted internationally and in the US shows that inequality is harmful to economic growth. International Monetary Fund economists found that for every 10 percent decrease in a country's inequality rate, there was a 50 percent increase in the length of the country's growth spell. Metropolitan areas in the US show similar trends; greater economic and racial inclusion corresponds with stronger growth. During the 1990s, the regions that had decreases in income disparities, concentrated poverty, or racial segregation showed greater increases in per capita income. Remarkably, there was an even stronger positive association between equity and growth in economically depressed regions like Detroit and Cleveland than in regions with strong economies.<sup>18</sup>

### *Regulatory Context*

There is little mention of prosperity, success, or potential in the federal regulatory requirements. However, one of EPA's five EJ principles is: "Enforcement of civil rights laws and environmental laws are complementary, and can be achieved in a manner consistent with, sustainable economic development."<sup>19</sup>



### Theme 3: Access

Access was the third most frequently discussed concept in the reviewed definitions of equity, and was mentioned either explicitly or implicitly in 10 of the 15 definitions. The theme “access” includes concepts such as “access to opportunities,” “full and equal access,” “disproportionate access,” and “increasing opportunities”. Opportunity was included in the access theme due to its typically parallel usage in the definitions. Metro's Community Investment Initiative clearly identified the importance of having access in its priorities.<sup>20</sup> An excerpt of the draft definition is provided for context.

Equity exists when individuals, communities and jurisdictions have **equal political, social, and economic opportunity**, and when there is fairness in the geographic distribution of the benefits and burdens of building a healthy region. Investing in equity is a means to achieve healthy communities, and an end that further contributes to the region’s prosperity. The recommendations of the CII and its work groups will address economic, social, political, and geographic equity by addressing structural disparities and by providing **equitable access to opportunities** in healthy communities.

Healthy communities provide the following outcomes:

- Social equity – **access to quality education, quality health care, healthy food, and a safe and healthy environment**
- Economic equity – **access to living wage jobs, small business opportunities, new economy job skills, and opportunities for wealth creation**
- Political equity – **access to political participation, and a proportional voice in local and regional decision-making processes**
- Geographic equity – proximity to institutions and infrastructure that provide social, economic and political opportunities (emphasis added)

--Metro’s Community Investment Initiative

#### *Regulatory Context*

Title VI LEP and Title II of the Americans with Disabilities Act specifically address access for LEP persons and for people with disabilities. Federal aid recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. Title II extends to all activities of state or local government, regardless of whether they are receiving federal funds, and requires that their programs are readily accessible to and usable by individuals with disabilities. “Meaningful access” and “readily accessible” are not defined. However, opportunity is addressed several times in these requirements.<sup>21</sup>

**Title II** Americans with Disabilities Act: Requirements of all activities of state or local government, regardless whether receiving Federal funds include:

- Must provide programs and services in an integrated setting unless separate or different measures are necessary to ensure **equal opportunity**.
- Must eliminate unnecessary eligibility standards or rules that deny individuals with disabilities an **equal opportunity** to enjoy their services, programs or activities unless

“necessary” for the provisions of the service, program or activity. (excerpt)

Access to political participation, or political equity as defined above, is one of EPA’s EJ requirements. EJ includes the meaningful involvement of all people.<sup>22</sup>

**EPA Environmental Justice:** Meaningful involvement means that:

1. potentially affected community members have an appropriate **opportunity to participate** in decisions about a proposed activity that will affect their environment and/or health;
2. the public’s contribution can influence the regulatory agency’s decision;
3. the concerns of all participants involved will be considered in the decision-making process; and
4. the decision-makers seek out and facilitate the involvement of those potentially affected.

## Theme 4: Barriers

Eliminating barriers was named in the research as a crucial concept, but was not prevalent in other organizations' definitions of equity. As mentioned above, one of the main themes found in the analysis was "access," such as having access to a quality education, adequate health care, parks and natural resources, and safe and efficient transportation. However, a lack of access, or the barriers that prevent people from having access, was less frequently mentioned. The term "access" was used in 9 of the 15 definitions, while "barrier" was named twice: in CLF's and ARC's definitions of equity, both of which are excerpted in this report.

In her analysis of how people talk about inequality, Shenker-Osorio argues that using the barrier frame is one of the most effective ways to talk about inequality. It relies on the metaphor that life is a journey and that one cannot get to his or her destination if there are obstructions in the path. It conjures images that everyone can relate to: feeling held back or not being able to go where one wants to go. On a much larger scale, this means that individuals are excluded from the economy and cannot contribute to society with the full measure of talent that they have. Lastly, inequality as a barrier focuses on the process rather than an outcome.<sup>23</sup>

Shenker-Osorio also points out that focusing on barriers provides an alternative to the dominant framework that blames individuals for their situations. According to her research, people tend to talk about wealthy people in terms of what they have, such as "the private jet crowd," while they talk about poor people in terms of their characteristics, such as unmotivated. The concept of eliminating barriers shifts the focus so that external constraints are the source of inequality, not individual failings or lack of effort. It also implies that all people are capable and deserving.

### *Regulatory Context*

The concept of barriers appears in the regulatory requirements only in relation to LEP individuals.<sup>24</sup>

**Executive Order 13166 Limited English Proficient (LEP) Persons:** Language for LEP individuals can be **a barrier to accessing important benefits or services,** understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. (emphasis added)

## Theme 5: Intentionality

Eight of the fifteen definitions examined in this analysis included, or referenced, the concept that equity requires deliberate action to eliminate disparities. In this thinking, equity requires strategic efforts to remove barriers and provide access to opportunities. “Creating the conditions” necessary for individual and community prosperity was one way to talk about intentionality.

Oregon Health Authority’s definition of health equity<sup>25</sup> and Policy Link’s definition of equity<sup>26</sup> include references to the need for intentionality in equity work.

Health equity is the attainment of the highest level of health for all people. Health equity entails **focused societal efforts** to address avoidable inequalities by equalizing conditions for the health of all groups, especially for those who have experienced socioeconomic disadvantages or historical injustices. (emphasis added)

--Oregon Health Authority

Just and fair inclusion. An equitable society is one in which all can participate and prosper. The goals of equity must be to **create the conditions** that allow all to reach their full potential. (emphasis added)

--Policy Link

In her analysis of how people talk about economic inequality, Shenker-Osorio argues that intentionality is one of the five key components in a strong definition. It provides an alternative to what she calls the “agency problem,” or the narrative that the economy is a self-regulating entity and that markets act on their own, rewarding successful entrepreneurs and punishing bad ideas and inefficient behavior.<sup>27</sup> The concept of intentionality contradicts this narrative by highlighting that systems of inequality are human made and therefore not inevitable. Instead, they are changeable and require deliberate action.

According to researchers who argue that intentionality is a key concept in equity work, deliberate analyses of seemingly benign policies is crucial to eliminating institutionalized discrimination. For example, mandatory background checks for all new employees at an organization may disproportionately affect individuals who grew up in communities with higher rates of police surveillance. Institutional policies, programs, and procedures that appear to be neutral in their effect on people in marginalized groups may unintentionally perpetuate disparities.

### *Regulatory Context*

Title VI and Environmental Justice requirements highlight the importance of intentional planning to avoid discrimination and minimize adverse effects. One of EPA’s Title VI principles is “Early, preventive steps are strongly encouraged to prevent potential Title VI violations and complaints.”<sup>28</sup> Inclusive and meaningful public involvement to ensure

collaborative, credible, and solid relationships between agencies and communities<sup>29</sup> requires deliberate action. Likewise, US Department of Transportation's LEP policy guidance requires recipients to provide language assistance to LEP persons that they serve, including public transportation passengers and persons living in areas affected or potentially affected by transportation projects. Intentionality is emphasized throughout Metro's Federal regulatory requirements.

## Approach

A definition can take many forms and is not necessarily one or two sentences, such as in a dictionary. Some organizations and agencies define equity in one sentence, others in one to three paragraphs, and others with lists of priorities or outcomes. The Applied Research Center's approach to a definition<sup>30</sup> bears inclusion because it offers an alternative method: a list of principles and goals, rather than a more traditional definition. Their report also lists equity outcomes and equity success indicators. (The bolding below highlights where the five themes discussed in this report emerge throughout the principles.)

### Equity Principles

- **Equal opportunity** and fair treatment: **All people** are afforded **full and fair access to all opportunities** and **benefits**, free of bias and **barriers**, with all programs designed to be inclusive and representative of the demographics of the communities in which they're based.
- Excellence and efficacy: Jobs are high-quality, and job programs are highly effective and specifically tailored to build strong skills and career paths for marginalized communities, so as to maximize the shared **benefits** and transformative **potential** of the green economy.
- Health and wellness: The health, safety and **well-being of all individuals and communities** are maximized, with **active attention** to eliminating existing disparities.
- Human rights and worker's rights: **All employees and community residents** are guaranteed basic rights and respect, including the right to organize and engage in collective advocacy.
- Sustainability and security: Households and communities are provided the support and protections needed for long-term economic security and environmental sustenance. This includes affordable housing, **access** to public transportation and proximity to a high-quality education for children.
- Transparency and accountability: Openness and fairness are maintained in all phases of planning, decision-making, program development, implementation, documentation and evaluation, with public participation of community stakeholders, particularly those most disadvantaged.

### Equity Goals

- Economic equity: Increase economic stability and reduce poverty by ensuring that economically disadvantaged people and communities have **full and fair access** to high-quality jobs, improved community services and environment, **access** to affordable housing and public transportation, and expanded **opportunities**.
- Gender equity: **Create opportunities** and outcomes that ensure that women have **full and fair access** to all jobs and contracts, and that all **benefits** and **burdens** are shared and bias-free.
- Racial equity: Create **opportunities** and outcomes that ensure that people of color have **full and fair access** to all jobs and contracts, and that **all benefits** and **burdens** are **shared** and bias-free. (emphasis added)

--Applied Research Center

## V. RECOMMENDATIONS

**1. Draw from existing definitions.** Much work has already been done by local and national organizations and agencies to create effective definitions of equity. The analyses of 15 definitions showed a consistent repetition of key themes despite differences in length, formatting or focus area. The following themes emerged after coding and analyzing the definitions:

- Everyone
- Prosperity
- Access
- Barriers
- Intentionality
- Ability
- Means/ends
- Well-being
- Benefits/burdens

Everyone, prosperity, and access were the three most commonly found themes in the 15 definitions of equity and are expanded upon in section 3 of this report. Two additional themes, eliminating barriers and intentionality (or equity as a deliberate action) were highly recommended in the research on how people talk about equity. Together, these five themes emerged as essential components in a definition of equity.

**2. Highlight our interdependence.** This report drew from research conducted by Anat Shenker-Osorio on how experts, organizations, and news media talk about economic inequality. She illustrated some of the common ways of talking about inequality, such as gaps or canyons, and expanded upon why these frames are divisive and can reinforce the idea of separate and competing fates. Instead, she argued for inclusive language that points out that we all have a shared fate and shared interests.

Public opinion polls conducted in Oregon show similar trends; respondent agreement rate was consistently higher with statements referring to all or everyone than to phrases that highlighted the rights or well-being of specific groups. In addition, this unifying narrative was the most frequently mentioned trend in the analysis of 15 organizational and agency definitions of equity. An all-inclusive narrative has been shown to be an effective way to talk about equity issues.

**3. Choose an effective format.** A definition can take many forms and is not necessarily one to two sentences. Some organizations and agencies define equity in one sentence, others in one to three paragraphs, and others with lists of priorities or outcomes. Regardless of the length or layout of the definition – Metro’s definition should address

the five components outlined in the message frame (values, vision, challenge, opportunity, response). Using these categories as a tool to guide the development of Metro's equity definition will help create a message that is clear, positive, and comprehensive regardless of the length or layout.

- 4. Focus on institutional equity.** Understanding the differences between interpersonal, institutional, and structural equity is crucial in identifying the parameters of Metro's role in advancing equity in the region. Institutional policies, practices, and procedures that appear to be neutral may actually benefit people in some groups at the expense of people in other groups. Institutional equity requires deliberate strategies to examine, question, and alter certain policies, practices, and procedures. Metro's equity definition should support this focus on institutional equity.



## APPENDIX A

Definitions of key terms and concepts from Metro's regulatory requirements (EPA Title VI, EPA Environmental Justice, FTA Title VI, FTA Environmental Justice, and Title II of the Americans with Disabilities Act).

**Adverse effects** (FTA EJ) - The totality of significant individual or cumulative human health or environmental factors, including interrelated social and economic effects.

**Disability** (ADA) - An individual with a disability is a person who (1) has a physical impairment that substantially limits a "major life activity", or (2) has record of such impairment, or (3) is regarded as having such an impairment.

**Discrimination** (FTA Title VI) - Any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results from disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

**Disparate impact** (FTA Title VI) - A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, national origin, where a recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

**Disparate treatment** (FTA Title VI) - Actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

**Disproportionately high or adverse effect** (FTA EJ) - Whether an adverse effect is 'disproportionately high' on minority and low-income populations depends on whether that effect is (1) predominantly borne by an EJ population, or (2) will be suffered by the EJ population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-EJ population. It is important to note that determinations of disproportionately high and adverse effects take into consideration the mitigation and enhancement measures that are planned for the proposed action.

**Disproportionate burden** (FTA Title VI) - A neutral policy that disproportionately affects low-income populations more than non-low income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives to mitigate burdens where practicable.

**Environmental Justice community** (FTA EJ) - The EJ community definitions apply to the residential population, as well as to workers, students, patients, and other individuals who are part of the community that would be affected by a given plan, program, policy, or project.

**Fair treatment** (EPA EJ) - No group of people should bear a disproportionate burden of environmental harms and risks, including those resulting from the negative environmental consequences of industrial, governmental, and commercial operations or programs and policies. EPA has expanded the concept of fair treatment to include how burdens and benefits are distributed across all populations.

**Limited English Proficient (LEP) Persons** (FTA Title VI) - Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported on the US Census that they speak English less than very well, not well, or not at all.

**Low income** (FTA EJ) - A person whose median household income is at or below the Department of Health and Human Services (HHS) poverty guidelines. A locally developed threshold is encouraged.

**Low income populations** (FTA EJ) - Any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed or transient persons such as migrant workers or Native Americans who will be similarly affected by a proposed DOT program, policy or activity.

**Meaningful involvement** (EPA EJ) - Meaningful involvement means that (1) potentially affected community members have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health; (2) the public's contribution can influence the regulatory agency's decision; (3) the concerns of all participants involved will be considered in the decision-making process; and (4) the decision-makers seek out and facilitate the involvement of those potentially affected.

**Minority** (FTA EJ) - Includes persons who are American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian and other Pacific Islander.

**Minority populations** (FTA EJ) - Any readily identifiable group or groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed or transient persons such as migrant workers or Native Americans who will be similarly affected by a proposed DOT program, policy or activity.

**National origin** (FTA Title VI) - The particular nation in which a person was born, or where the person's parents or ancestors were born.

**Predominantly minority area** (FTA Title VI) - A geographic area, such as a neighborhood, Census tract, block or block group, or traffic analysis zone, where the proportion of minority persons residing in that area exceeds the average proportion of minority persons in the recipient's service area.

**APPENDIX B:** Contents of Organizational Definitions of Equity

	Components of Inequality Definition					Equity Strategy Message Box				Dimensions			Key Themes										Regulatory Requirements												
	Intentionality/ deliberate action	Unfairness/ unequal conditions	Detectability/Measureable	Alterability/Changeable	Not inevitable	Vision	Challenge	Opportunity	Response	Interpersonal	Institutional	Structural	Access	Barrier	Ability	Everyone	Means	Ends	Well-being	Prosperity	Intentional	Benefits	Burdens	List of focus areas	LEP	Title VI				EJ			ADA		
																								Meaningful access	Meaningful public particip	Disparate impact	Disparate treatment	Disproportionate burden	Adverse effects	Fair treatment	Meaningful involvement	Full and fair participation	Readily accessible		
Alameda County Dept of PH	x	x	-	-	x	-	-	-	-	-	x	x					-	-		-			x	-	-	-	-			-	-				
Applied Research Center			-	-	-						-	x	x		x			x	x	x	x	x	x	-	-				x	-	-	-			
Coalition for a Livable Future	-	-	-	x		-	-	-	-		x	x	x	x				x	x	x	x	x		-	-						x				
Community Investment Initiative				-		-					x	x			-	x	x		x	-	x	x	x	-	-				-	-	-				
Greater Portland Pulse						-						x			x				x				x	-							-				
Multnomah County, ODE						-									x		-		x										-						
Northwest Health Foundation		-	-	-		-	-				x			x	x	x	x			x	x		x	-	-										
OEHR, Portland						-						x		x	x	x	x	x	x		x			-					-	-					
Oregon Health Authority		-		-	x	-									x					-															
PolicyLink						-									x	-			x	x									-	-	-				
Portland Plan						-						x		x	x	x	x	x	x		x			-					-	-					
Race and Social Justice Institute						-						x																-	-						
King County		-		-		-	-				-	x	-	x	x					x			-	x	-	-			-	-					
Upstream Public Health		x		-		-	-						-		x				x	-				-				-	-						
Urban League, Portland						-						x		x	x	x	x	x	x		x			-					-	-					
<b>Directly mentioned</b>	<b>1</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>2</b>					<b>0</b>	<b>3</b>	<b>1</b>	<b>10</b>	<b>2</b>	<b>6</b>	<b>11</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>11</b>	<b>4</b>	<b>7</b>	<b>3</b>												
<b>Implied</b>	<b>1</b>	<b>4</b>	<b>4</b>	<b>7</b>	<b>1</b>					<b>1</b>	<b>2</b>	<b>3</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>0</b>	<b>4</b>	<b>0</b>	<b>1</b>												
<b>Total</b>	<b>2</b>	<b>6</b>	<b>4</b>	<b>8</b>	<b>3</b>	<b>13</b>	<b>5</b>	<b>3</b>	<b>9</b>	<b>1</b>	<b>5</b>	<b>4</b>	<b>10</b>	<b>4</b>	<b>6</b>	<b>12</b>	<b>6</b>	<b>7</b>	<b>6</b>	<b>11</b>	<b>8</b>	<b>7</b>	<b>4</b>	<b>6</b>	<b>8</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>5</b>	<b>3</b>	<b>10</b>	<b>8</b>	<b>6</b>	<b>1</b>

x Definition uses term or synonym  
 - Definition implies term or concept

## NOTES

1. John A. Powell. 2009. Post racialism or Targeted Universalism? *Denver University Law Review* 86, 785-806. Retrieved from <http://www.law.du.edu/documents/denver-university-law-review/powell.pdf>
2. Fred L. Pincus. 2000. Discrimination comes in many forms: Individual, institutional, and structural (pp. 31-35). In Adams, M., Bleumenfeld, W. J., Castaneda, R., Hackman, H. W., Peters, M. L., and Zuniga, X. (Eds.) *Readings for Diversity and Social Justice: An Anthology on Racism, Antisemitism, Sexism, Heterosexism, Ableism, and Classism*. New York: Routledge.
3. Definitions adapted from work by the Race and Social Justice Initiative. Understanding interpersonal, institutional, and structural racism. Retrieved from <http://www.seattle.gov/rsji/docs/defining%20racism.pdf>
4. Anat Shenker-Osorio. 2010. Narrowing the gap, leveling the playing field: How we talk about economic inequality. Retrieved from [http://neighborhoodpartnerships.org/wp-content/uploads/2011/06/Narrowing-the-Gap\\_shenker-osorio\\_May-2010.pdf](http://neighborhoodpartnerships.org/wp-content/uploads/2011/06/Narrowing-the-Gap_shenker-osorio_May-2010.pdf)
5. Lawrence Wallack. 2012. *Framing Workshop (including an adaptation of Public Works' Message Box)*. Presented at Metro's Senior Leadership Team Retreat on May 18, 2012.
6. Public Works. 2012. *Messaging memo: Keeping our message big enough*. Retrieved from [http://www.cwfny.org/wordpress/wp-content/uploads/2012/06/Keeping\\_Your\\_Message\\_Big\\_Enough-Public-Works.pdf](http://www.cwfny.org/wordpress/wp-content/uploads/2012/06/Keeping_Your_Message_Big_Enough-Public-Works.pdf)
7. Northwest Health Foundation. The NWHF Case for Equity. Retrieved from <http://nwhf.org/about/values/>
8. Shenker-Osorio, 2010.
9. Anika Fassia and Patrick Bresette. *Race and the role of government: Changing the terrain of public discourse* (presentation). Public Works.
10. Patrick Bresette and Anika Fassia. 2012. *Framing to build public will* (presentation). Oregon Advocate's College 3, Session 1. Public Works.
11. John A. Powell, 2009.
12. Federal Transit Administration. 2012. Environmental Justice Policy Guidance for Federal Transit Administration Recipients (Circular FTA C 4703.1). Retrieved from [http://www.fta.dot.gov/documents/FTA\\_EJ\\_Circular\\_7.14-12\\_FINAL.pdf](http://www.fta.dot.gov/documents/FTA_EJ_Circular_7.14-12_FINAL.pdf)
13. Environmental Protection Agency. 2010. EPA's action development process: Interim guidance on considering environmental justice during the development of an action. *OPEI Regulatory Development Series*. <http://www.epa.gov/environmentaljustice/resources/policy/considering-ej-in-rulemaking-guide-07-2010.pdf>
14. Coalition for a Livable Future. Defining Regional Equity. *Regional Equity Atlas*. Retrieved from <http://clfuture.org/programs/regional-equity-atlas/about-regional-equity-atlas-project/defining-regional-equity>
15. Sarah Treuhaft, Angela Glover Blackwell, and Manuel Pastor. 2011. America's tomorrow: Equity is the superior growth model. Policy Link and PERE. Retrieved from [http://www.policylink.org/atf/cf/%7B97c6d565-bb43-406d-a6d5-eca3bbf35af0%7D/SUMMIT\\_FRAMING\\_WEB\\_FINAL\\_20120127.PDF](http://www.policylink.org/atf/cf/%7B97c6d565-bb43-406d-a6d5-eca3bbf35af0%7D/SUMMIT_FRAMING_WEB_FINAL_20120127.PDF)

16. Chris Benner and Manuel Pastor. 2013. Buddy, can you spare some time? Social inclusion and sustained prosperity in America's metropolitan regions. MacArthur Foundation Network on Building Resilient Regions. <http://brr.berkeley.edu/wp-content/uploads/2013/05/Benner-Pastor-Buddy-Spare-Some-Time.pdf>
17. The Equality Trust. 2012. Research. Retrieved from [http://www.equalitytrust.org.uk/research?field\\_research\\_subject\\_tid=All](http://www.equalitytrust.org.uk/research?field_research_subject_tid=All)
18. Sarah Treuhaft, Angela Glover Blackwell & Manuel Pastor, 2011.
19. Environmental Protection Agency. 2006. Title VI Public Involvement Guidance for EPA Assistance Recipients Administering Environmental Permitting Programs (Recipient Guidance). Federal Register 71(54), 14207-14217. Retrieved from <http://www.gpo.gov/fdsys/pkg/FR-2006-03-21/pdf/06-2691.pdf>
20. Community Investment Initiative, Metro. CII Definition of Equity (draft, internal communications).
21. Department of Justice. 2002. Title II Highlights. Retrieved from <http://www.ada.gov/t2hlt95.htm>
22. EPA, 2010.
23. Shenker-Osorio, 2010.
24. Department of Transportation. 2005. Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (Notices). *Federal Register* 70(239), 74087-74100.
25. Office of Equity and Inclusion, Oregon Health Authority. FAQs: What is Health Equity? Retrieved from <http://www.oregon.gov/oha/oei/pages/faq.aspx>
26. PolicyLink. Our Mission. Retrieved from [http://www.policylink.org/site/c.lkIXLbMNJrE/b.7977453/k.FBB8/PolicyLink\\_About\\_Us.htm](http://www.policylink.org/site/c.lkIXLbMNJrE/b.7977453/k.FBB8/PolicyLink_About_Us.htm)
27. Shenker-Osorio, 2010.
28. EPA, 2006.
29. Environmental Protection Agency. 2003. Public Involvement Policy. Retrieved from <http://www.epa.gov/publicinvolvement/policy2003/finalpolicy.pdf>
30. Yvonne Yen Liu & Terry Keleher. Green equity toolkit: Standards and strategies for advancing race, gender and economic equity in the green economy. Applied Research Center. Retrieved from [http://www.arc.org/downloads/Green\\_Toolkit\\_112009.pdf](http://www.arc.org/downloads/Green_Toolkit_112009.pdf)