Toolkit for Considering Equity When Conducting Oversight Work

Council of the Inspectors General on Integrity and Efficiency

The Council of the Inspectors General on Integrity and Efficiency (CIGIE) Diversity, Equity, Inclusion, and Accessibility (DEIA) Committee looks to affirm, advance, and augment CIGIE's commitment to promote a diverse, equitable, and inclusive workforce and accessible workplace environment throughout the Office of Inspector General (OIG) community that will help ensure comprehensive work, produced by a well-trained and highly skilled workforce, to be made accessible, when possible, to the diverse public it serves. The CIGIE Toolkit for Considering Equity When Conducting Oversight Work was developed by the DEIA Committee Stakeholder Oversight Working Group, composed of representatives from across the OIG community.

Links or references to resources outside the Federal government are being provided as a convenience and for informational purposes only; they do not constitute an endorsement or an approval.

CIGIE Toolkit for Considering Equity When Conducting Oversight Work

This toolkit is intended to assist Offices of Inspectors General (OIG) with considering equity in oversight work, including audits, investigations, evaluations, reviews, and other projects. The toolkit provides general considerations, resources and tools, and examples of including equity in oversight work in the following areas:

- general equity principles,
- program and policy oversight,
- data impacts on equity in oversight work,
- reporting and disseminating information,
- human capital,
- contracting and procurement,
- education,
- financial,
- information and communication technology,
- intelligence, and
- health equity policy.

In each area, the toolkit identifies relevant considerations for oversight professionals, resources and tools that can be employed to address those considerations, and examples of oversight work employing those methodologies, all to provide a baseline to inform discussions with stakeholders when planning oversight work and help guide future work in these areas.

What is Equity?

Equity is the consistent and systematic fair, just, and impartial treatment of all individuals. The Office of Management and Budget (OMB) is responsible for identifying effective methods for assessing whether agency policies and actions equitably serve all eligible individuals and communities, particularly those that are currently and historically underserved. The OMB is focusing on the following areas in accomplishing this task: (1) equity assessments and strategies, (2) barrier and burden reduction, (3) procurement and contracting, (4) financial assistance, and (5) stakeholder and community engagement. In 2018, the Government Accountability Office (GAO) added the term "equity" back into "Government Auditing Standards" (the Yellow Book).

According to Section 1.02 of the Yellow Book, "The concept of accountability for use of public resources and government authority is key to our nation's governing process. Management and officials entrusted with public resources are responsible for carrying out public functions and providing service to the public effectively, efficiently, economically, ethically, and equitably within the context of the statutory boundaries of the specific government program."

Throughout the toolkit, we use acronyms to streamline the content. We provide an acronym list at the end of the toolkit.

Table 1. General Equity Principles

Considerations and Questions to Ask	Resources and Tools
• Incorporate equity early in project planning. • Engage with stakeholders during project planning and fieldwork. • Explore different ways to measure equity, such as reviewing policies, benchmarking, measuring outcomes, or conducting gap analysis.	• EO 13950, Combating Race and Sex Stereotyping • EO 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government • EO 14003, Protecting the Federal Workforce • EO 14091, Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government • EO 14058, Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government • OMB, Study to Identify Methods to Assess Equity: Report to the President • GSA, Defining Equity in Federal Government Evaluations • Urban Institute, Community Voice is Expertise • Urban Institute, Community Engagement during the COVID-19 Pandemic and Beyond

Table 2. Program and Policy Oversight

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
• Assess equity of agency policies. • Track agency progress in addressing equity concerns. • Identify barriers to agency benefits and services. • Assess accessibility of agency programs. • Assess resources dedicated to equity initiatives.	• Program application (completed and abandoned), waitlist, enrollment, withdrawal, completion, administration, and outcome data • Stakeholder and user focus groups, surveys, and interviews • Feedback from community organizations and stakeholders or entities that work with program users	• DOJ OIG, Review of Gender Equity in the Department's Law Enforcement Components • DOL OIG, ETA Could Not Determine the Impact its Face Forward Program had on Participants Ages 17 and Under • EPA OIG, Improved EPA Oversight of Funding Recipients' Title VI Programs Could Prevent Discrimination

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
• Assess agency's proactivity versus reactivity in addressing equity concerns. • Assess the experience of an outward-facing agency's customers, for equity concerns.	• MITRE, A Framework for Assessing Equity in Federal Programs and Policy • HHS, Conducting Intensive Equity Assessments of Existing Programs, Policies, and Processes • Digital.gov, Customer Experience Toolkit • OPM, Measuring Results: Evaluation	• ED OIG, The Office for Civil Rights' Complaint Dismissal Process • NSA OIG, Review of the Agency's Implementation of Executive Order 13950 on Combating Race and Sex Stereotyping

Table 3. Data Impacts on Equity in Oversight Work

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
• Collect voluntarily self-reported demographic data. • Seek out qualitative data (for example, interviews, focus groups, narrative, long form surveys) in addition to quantitative administrative data to better understand lived experiences. • Consult agency staff and community stakeholders in defining which data should be collected or reused. • Be transparent about the limitations of the data. • Disaggregate data by demographics. • Incorporate informed consent whenever possible. • Share data to reduce the burden of duplicate data collection.	• Federal employment reports • Administrative data • Demographic data (for example, U.S. Census, American Community Survey) • Focus groups • Trend analysis, longitudinal studies, statistical analysis • Socioeconomic indices (for example, CDC's Social Vulnerability Index) • U.S. Census, Advancing Equity with Data • OMB, Study to Identify Methods to Assess Equity • Urban Institute, Principles for Advancing Equitable Data Practice	• ED OIG, New York State's and Selected Districts' Implementations of Selected Every Student Succeeds Act Requirements under the McKinney-Vento Homeless Assistance Act • DOJ OIG, Evaluation of Gender Equity in the Federal Bureau of Investigation's Training Process for New Special Agents and Intelligence Analysts at the FBI Academy • DOI OIG, Management Advisory: Recommendation for Identifying, Protecting, and Ensuring Proper Handling of Tribal Data and Information • HHS OIG, CDC Found Ways To Use Data To Understand and Address COVID-19

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
- Engage with domain experts (such as agency staff, case workers) and methodology experts (such as data scientists and statisticians). - Conduct an equity assessment. - Retain data privacy and consider data access. - Determine how to handle missing data and small sample sizes. - Consider other socioeconomic factors that may contribute to disparities in data. - Make translators available during community engagement. - Develop survey questionnaires in more than one language.	Equitable Data Working Group, A Vision for Equitable Data	Health Disparities, Despite Challenges With Existing Data - GAO, Tax Equity: Lack of Data Limits Ability to Analyze Effects of Tax Policies on Households by Demographic Characteristics - GAO, Military Justice: DoD and the Coast Guard Need to Improve Their Capabilities to Assess Racial and Gender Disparities

Table 4. Reporting and Disseminating Information

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
- Solicit and incorporate program feedback from people with lived experiences. - Translate materials into languages most applicable to your audiences. - Test for accessibility. - Comply with Section 508 guidelines that require products to present data and visuals in a manner that is mindful	- Translators - Data visualization training - Color contrast guidance 508 compliance guidelines - GSA, Section508.gov - GSA, PlainLanguage.gov - APA, Bias-free language 18F Content Guide, Inclusive language	- GAO, GAO-18-258, K-12 Education: Discipline Disparities for Black Students, Boys, and Students with Disabilities - HHS OIG, Inaccuracies in Medicare's Race and Ethnicity Data Hinder the Ability To Assess Health Disparities (hhs.gov), Las imprecisiones en los datos de raza y origen étnico de

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
of cognitive, visual, and other disabilities to improve accessibility. For example, all graphics should alternative text (alt text). • Use inclusive images. • Report out smaller demographic groups, while protecting privacy. • Consider using equitable data visualization. • Write for your intended audience. • Use inclusive language for increased accuracy in reporting equity. For example, using person-first and identity-first language. • Use plain language. • Review inclusive language guidance. • Make websites, reports, and digital forms accessible. • Widely disseminate the results of equity-oriented evaluations. • Account for how publication may reinforce inequities or close disparities.	• Urban Institute, Do No Harm Guide: Applying Equity Awareness in Data Visualization • NIH, Standards for Collecting and Reporting Data on Race and Ethnicity • DOJ, Information Quality Guidelines	Medicare dificultan la evaluación de disparidades en la salud

Table 5. Human Capital

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO

• Assess the following for equity concerns:
  ○ agency personnel data policies, standards, and procedures.
  ○ guidance on employment, and reporting on human resources, payroll, and training data.
  ○ human resources data and technology to support employees.
  ○ workforce analysis and planning capabilities to improve human capital management.
• Conduct program assessments that consider areas such as the efficiency, effectiveness, improvement, or the learning, of the agency's workforce.
• Issued reports that provide for the assessment of trends and workforce challenges.
• Assess agency data for equity:
  ○ workforce salary distribution
  ○ recruitment, relocation, and retention incentives
  ○ bonuses and other compensation
  ○ occupational areas
  ○ promotions and separations
  ○ turnover indicators
	• Government-wide human capital priorities and strategies, including the Federal Workforce Priorities Report
	• Employee surveys, including employee surveys or reimbursable survey services
	• Reviews of human capital measures and targets, including HRStat quarterly reviews
	• Meetings with agency human capital leaders, including human capital reviews
	• Summaries of employees' occupations, agency of employment, salaries, promotions, awards, and other actions in Federal employment reports
	• Operating plans that detail human capital strategies, including Human Capital Operating Plans
	• Employment documentation, such as personnel actions and records in personnel documentation
	• Employee health insurance information
	• U.S. AbilityOne Commission Strategic Plan FY 2022-2026 [See Strategic Objectives (II: Identify, Publicize, and Support the Increase of Good Jobs and Optimal Jobs in the AbilityOne Program.)]
		• GAO, Accessible Version, Federal Workforce: Strengthening Diversity, Equity, Inclusion, and Accessibility
		• ED OIG, The Office for Civil Rights' Complaint Dismissal Process
		• DOJ OIG, Audit of the Federal Bureau of Prison's Management and Oversight of its Chaplaincy Services Program
		• DOJ OIG, Review of Gender Equity in the Department's Law Enforcement Components
		• DOL OIG, ETA Could Not Determine the Impact its Face Forward Program had on Participants Ages 17 and Under
		• EPA OIG, Improved EPA Oversight of Funding Recipients' Title VI Programs Could Prevent Discrimination
		• FCA OIG, Human Capital Planning at the Farm Credit Administration
		• NRC OIG, Audit of the NRC's Compliance with E.O. 13950
		• SEC OIG, Audit of the Representation of Minorities and Women in the SEC's Workforce
		• TVA OIG, Organizational Effectiveness Follow up: Human Resources Employee Health

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
- o statistics on underrepresented groups in the workforce - Assess whether agencies have equitable access to employment.		

Table 6. Contracting and Procurement

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
- Identify training opportunities that inform equitable approaches to contracting. - Identify opportunities for supplier diversity and equity. - Do contracting actions to determine whether there was fair and equitable access to websites, forms, and systems? - Do supply chain and workforce equity in contracting and procurement actions happen?	- Federal Acquisition Regulations - Agency specific acquisition regulations - Contract Writing Systems and clause identifiers - Contracting Officer/Contracting Officer's Representative-training materials - GSA, Supplier Diversity and Equity Action Plan	- DOL OIG, OFCCP Did Not Show it Adequately Enforced EEO Requirements on Federal Construction Contracts - PBGC OIG, PBGC's Use of the Women-Owned Small Business Federal Contracting Program - DoD OIG, Audit of DoD Service-Disabled Veteran-Owned Small Business Contract Awards

Table 7. Education

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
- Does the agency: - o offer further education opportunities, particularly those needed to close identified gaps,	Employee surveys can include Government-wide or agency-specific efforts.	ED OIG, Ohio Department of Education's and Selected Virtual Charter Schools' Internal Controls Over Individualized Education Programs

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
- reimburse employees who want to further their education, - have a student loan repayment program, - encourage employees to maintain their licenses and memberships to professional organizations, or - pay for continuing professional education (CPE) requirements licenses and memberships to professional organizations? - Assess agency program evaluations that consider areas where different levels or types of education are needed to fill identified position gaps. - Do comparisons of demographics to educational requirements reflect equity concerns?	- Federal employment reports can include summaries of employees' occupations, agency of employment, salaries, promotions, awards, and other actions. - Employment documentation can include personnel actions and records. - Partnership for Public Service can provide data and analysis. - National Fund for Workforce Solutions can help with the development of OIG finding development and recommendations. - Tuor and Backes-Gellner, Educational diversity and individual pay: the advantages of combining academic and VET graduates in the workplace. - Training Industry, How Education Benefits Drive Diversity, Equity and Inclusion in the Workplace - Bright Horizons, Education Index: Workforce Education And Equity In The Workplace	- ED OIG, Office of the Chief Privacy Officer's Processing of Family Educational Rights and Privacy Act Complaints - ED OIG, Office of Special Education Programs' Differentiated Monitoring and Support - ED OIG, New York State's and Selected District's Implementation of Selected Every Student Succeeds Act Requirements under the McKinney-Vento Homeless Assistance Act

Table 8. Financial

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
• Do existing policies and procedures identify potential financial barriers that can prevent equitable access to financial programs? • Assess pay equity to determine whether individuals are equitably compensated for similar work. • If differences in compensation are found, consider what socioeconomic factors may contribute to these differences. • Assess equitable access to governmental and nongovernmental resources and programs available to employees, such as EAP and PSLF.	• Government-wide strategic plan to advance diversity, equity, inclusion, and accessibility in the Federal workforce • Federal employment reports • Equal Pay Act (1963) • OPM, Guidance for Implementation of Executive Order 14003: - Protecting the Federal Workforce • OPM, 2022 Federal Employee Viewpoint Survey Results	• DOJ OIG, Evaluation of Gender Equity in the Federal Bureau of Investigation's Training Process for New Special Agents and Intelligence Analysts at the FBI Academy • SEC OIG, Audit of the Representation of Minorities and Women in the SEC's Workforce • ED OIG, DEIA FY 2022 Annual Progress Report • Peace Corps OIG, The Peace Corps' Management of Payroll and Benefits for U.S. Direct Hires • TVA OIG, Audit of Employee Relocation Allowances • SEC OIG, Audit of the Representation of Minorities and Women in the SEC's Workforce

Table 9. Information and Communication Technology

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
• Assess the ability of customers, including individuals with disabilities or limited access to the Internet, to access programs that use ICT and/or modifications to ICT systems.	• Software, applications, websites, videos, electronic documents, databases, and other electronic ICT the agency develops, procures, maintains, or uses	• GAO, Electronics Government Act: Agencies Have Implemented Most Provisions, but Key Areas of Attention Remain • VA OIG, Enhanced Strategy Needed to Reduce Disability Exam Inventory Due

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
• Assess the agency's use of or response to social media as it relates to equity. • Assess programs designed to improve the equity of access to the Internet. • Assess agency's internal processes to ensure the accessibility of their ICT for individuals with disabilities.	• Hardware, computers, information kiosks and transaction machines, telecommunication equipment, customer premises equipment, multifunction office machines, and other physical ICT the agency develops, procures, maintains, or uses • Digital.gov, Embedding Equity in Civic Design to Transform Customer Experience • Digital.gov, Government Usability Case Studies • GSA, Section508.gov • Digital.gov, An Introduction to Accessibility • CDC, Using Social Media • DOC, Digital Equity Guide for the States • ED, Advancing Digital Equity for All	to the Pandemic and Errors Related to Canceled Exams • DHS OIG, FEMA Made Efforts to Address Inequities in Disadvantaged Communities Related to COVID-19 Community Vaccination Center Locations and Also Plans to Address Inequity in Future Operations • DoD OIG, Evaluation of DoD Efforts to Address Ideological Extremism Within the Armed Forces • GAO, Broadband: National Strategy Needed to Guide Federal Efforts to Reduce Digital Divide

Table 10. Intelligence

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO

• Consider equity for:
   o racial, ethnic, and other underrepresented demographic groups, and
   o foreign beliefs and cultural practices.
	• Workforce data and assessments
	• Analysis of intelligence agencies applicant flow data
	• External analytic evaluation programs and periodic reviews
	• External reviews on security and counterintelligence determinations
		• GAO, Intelligence Community: Additional Actions Needed to Strengthen Workforce Diversity Planning and Oversight

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO

• Consider equity within intelligence operations:
    ○ unbiased intelligence analytic products, and
    ○ equity in human intelligence operations.
	• White House Archives, Presidential Memorandum: Promoting Diversity and Inclusion in the National Security Workforce
	• ODNI, Principles of Professional Ethics for the Intelligence Community
	• CRS, Intelligence Community Diversity and Equal Opportunity
	• ODNI, Intelligence Community Directive 203 Analytic Standards	

Table 11. Health Equity

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
• Assess how inequities may limit access to health care benefits and services. • Assess equitable access to services, such as telehealth, telemedicine, behavioral health, vaccinations, treatment for substance use disorder, and maternal health. • Assess the social factors influencing maternal health services. • Consider privacy concerns when reporting on the health outcomes of a small group of individuals. • Assess occupational health equity. • Assess equitable allocation and use of health care funds.	• Focus groups • Community outreach • Survey and interview data • Enrollment data and criteria • Demographic data • Administrative claims and encounter data • CMS, CMS Framework for Health Equity • CDC, What is Health Equity? • GAO, Health Care Capsule: Racial and Ethnic Health Disparities • VA, Equity Action Plan Summary: U.S. Department of Veterans Affairs • VA, Health Equity Action Plan Final	• DoD OIG, Evaluation of DoD Military Medical Treatment Facility Challenges During the Coronavirus Disease-2019 (COVID-19) Pandemic in Fiscal Year 2021 • DOL OIG, OIG Alert Memorandum: ETA and States Need to Ensure the Use of Identity Verification Service Contractors Results in Equitable Access to UI Benefits and Secure Biometric Data • HHS OIG, Hospitals Reported That the COVID-19 Pandemic Has Significantly Strained Health Care Delivery • HHS OIG, COVID-19 Had a Devastating Impact on Medicare Beneficiaries in Nursing Homes During 2020

Considerations and Questions to Ask	Resources and Tools	Examples from OIG and GAO
- Assess social determinants of health. - Assess underrepresented groups' health concerns, for example Tribal Health equity. - Identify healthcare fraud schemes targeted at underrepresented groups. - Identify gaps in equitable access to healthcare and health insurance coverage for employees. - Do individuals have equitable access to affordable health insurance? - Consider culturally accessible health services.	- VA, OHE Operational Plan FY2023 - VA, Diversity, Equity, and Inclusion Initiative - NIH, NIH-Wide Strategic Plan for Diversity, Equity, Inclusion, and Accessibility - HHS, Culturally and Linguistically Appropriate Services	- HHS OIG, Certain Medicare Beneficiaries, Such as Urban and Hispanic Beneficiaries, Were More Likely Than Others To Use Telehealth During the First Year of the COVID-19 Pandemic - VA OIG, Comprehensive Healthcare Inspection of the VA Pacific Islands Health Care System, Honolulu, Hawaii - VA OIG, Department of Veterans Affairs Office of Inspector General Healthcare Inspection: Summarization of Select Aspects of the VA Pacific Islands Health Care System Honolulu, Hawaii - GAO, GAO-21-69, Accessible Version, VA Health Care: Better Data Needed to Assess the Health Outcomes of Lesbian, Gay, Bisexual, and Transgender Veterans - GAO, GAO-20-83, Accessible Version, VA Health Care: Opportunities Exist for VA to Better Identify and Address Racial and Ethnic Disparities

Acronyms List

APA American Psychological Association

CIGIE Council of the Inspectors General on Integrity and Efficiency

CDC Centers for Disease Control and Prevention

CMS Centers for Medicare and Medicaid Services

CPE Continuing Professional Education

CRS Congressional Research Service

DEIA Diversity, Equity, Inclusion, and Accessibility

DHS Department of Homeland Security

DOC Department of Commerce

DoD Department of Defense

DOI Department of the Interior

DOJ Department of Justice

DOL Department of Labor

EAP Employee Assistance Program

ED Department of Education

EO Executive Order

EPA Environmental Protection Agency

ETA Employment and Training Administration

FBI Federal Bureau of Investigation

FCA Farm Credit Administration

FEMA Federal Emergency Management Agency

GAO Government Accountability Office

GSA General Services Administration

HHS Department of Health and Human Services

ICT Information and Communication Technology

IG Inspector General

NIH National Institutes of Health

NRC Nuclear Regulatory Commission

NSA National Security Administration

ODNI Office of Director of National Intelligence

OFCCP Office of Federal Contract Compliance Programs

OHE Veterans Health Administration, Office of Health Equity

OIG Office of Inspector General

OMB Office of Management and Budget

OPM Office of Personnel Management

PBGC Pension Benefit Guaranty Corporation

PSLF Public Student Loan Forgiveness

SEC Securities and Exchange Commission

TVA Tennessee Valley Authority

VA Department of Veterans Affairs

VET Vocational Education and Training