

**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**





## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

September 28, 2022

MEMORANDUM FOR: The Honorable Deanne Criswell  
Administrator  
Federal Emergency Management Agency

FROM: Joseph V. Cuffari, Ph.D.      **JOSEPH V  
CUFFARI**      Digitally signed by  
Inspector General      JOSEPH V CUFFARI  
Date: 2022.09.27  
12:59:06 -04'00'

SUBJECT: *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*

For your action is our final report, *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*. We incorporated the formal comments provided by your office.

The report contains two recommendations to improve equity in future FEMA operations. Your office concurred with our two recommendations. Based on information provided in your response to the draft report, we consider both recommendations resolved and open. As prescribed by *Department of Homeland Security Directive 077-01, Follow-Up and Resolution for Office of Inspector General Report Recommendations*, within 90 days of the date of this memorandum, please provide our office with a written response that includes your (1) agreement or disagreement, (2) corrective action plan, and (3) target completion date for each recommendation. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendations. Until your response is received and evaluated, the recommendations will be considered resolved and open.

Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and the disposition of any monetary amounts. Please send your response to [OIGAuditsFollowup@oig.dhs.gov](mailto:OIGAuditsFollowup@oig.dhs.gov).



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Consistent with our responsibility under the *Inspector General Act of 1978, as amended*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Bruce Miller, Deputy Inspector General for Audits, at (202) 981-6000.

Attachment



# DHS OIG HIGHLIGHTS

## ***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***

**September 28, 2022**

### **Why We Did This Audit**

In January 2021, FEMA established CRAG to evaluate policies, practices, strategies, and plans to ensure equity in vaccine access and administration. We conducted this audit to determine the extent to which the CRAG alleviated potential inequities in vaccine mission activities and how FEMA intends to ensure integration of civil rights and equity in future activities.

### **What We Recommend**

FEMA should finalize the *Equity in Policy Guide and Lens* and establish a plan for obtaining new systems or modify present systems, where feasible, to collect demographic data about applicants.

#### **For Further Information:**

Contact our Office of Public Affairs at (202) 981-6000, or email us at [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov)

### **What We Found**

The Federal Emergency Management Agency (FEMA), in coordination with the Centers for Disease Control and Prevention (CDC) and other Federal and state partners, used the CDC Social Vulnerability Index (SVI) in an effort to identify and address inequities in minority and disadvantaged communities related to the locations of COVID-19 Community Vaccination Centers. Specifically, FEMA's Civil Rights Advisory Group (CRAG) implemented a methodology that prioritized states based on the CDC SVI. This methodology sought to address differences in coronavirus disease 2019 (COVID-19) care and outcomes within communities of color and other underserved populations.

Additionally, to address inequity in future operations, FEMA's 2022–2026 Strategic Plan outlines objectives for instilling equity in emergency management. FEMA also established the Equity Enterprise Steering Group to recommend revisions to FEMA's policies, in collaboration with FEMA's Enterprise Governance Boards. Finally, according to FEMA, its Office of Equal Rights and Privacy Office are developing a system to collect demographic data on applicants to help identify and target resources to underserved and marginalized communities. However, FEMA has neither finalized its equity guide nor developed a system to collect demographic data on applicants.

### **FEMA Response**

FEMA concurred with our two recommendations. A copy of FEMA's comments is in Appendix B.



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### Background

Federal agencies are required to advance equity through Federal programs and activities, including through activities that address the coronavirus disease 2019 (COVID-19) pandemic.<sup>1</sup> Executive Order 13985 provides a working definition of equity as the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment. Historically, the Federal Emergency Management Agency (FEMA) has not tracked information relative to equity.

According to FEMA, the Civil Rights Advisory Group (CRAG) was established in January 2021 as an ad hoc group formed out of special circumstances to share information and ensure integration of civil rights and equity into all vaccine mission activities. There were no written policies and procedures pertaining to this group and its formation.

FEMA's Office of Equal Rights oversaw the CRAG and included personnel from across FEMA, as well as the U.S. Department of Health and Human Services (HHS), Centers for Disease Control and Prevention (CDC), U.S. Department of Housing and Urban Development, Department of Homeland Security Office for Civil Rights and Civil Liberties, and the U.S. Department of Justice's Civil Rights Division.

According to FEMA, the CRAG helped develop the methodology used to determine FEMA Community Vaccination Centers (CVC) pilot site locations and worked to analyze demographic data and collaborate with community-based organizations to identify and support underserved communities. The pilot CVCs' intent focused on the delivery of vaccines to historically underserved populations, in response to Executive Order 13995, which directed a government-wide effort to address the severe and disproportionate effects of COVID-19 on those populations.

Initially, we conducted this audit to determine the extent to which FEMA is ensuring the CRAG was working to eliminate potential inequities in FEMA vaccine activities. However, according to FEMA, the CRAG was terminated in May 2021. Therefore, with the termination of the CRAG, we modified our objective to determine the extent the CRAG alleviated potential inequities in vaccine mission activities and how FEMA intends to ensure integration of civil rights and equity in future activities.

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<sup>1</sup> Executive Order 13985, *Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (Jan. 20, 2021) and Executive Order 13995, *Executive Order on Ensuring an Equitable Pandemic Response and Recovery* (Jan. 21, 2021).



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### Results of Audit

#### **FEMA Used the CDC Social Vulnerability Index in an Effort to Address Inequities in Disadvantaged Communities Concerning Locations of COVID-19 Community Vaccination Centers and Also Plans to Address Inequity in Future Operations**

FEMA's CRAG made efforts to address inequities experienced in minority and disadvantaged communities concerning locations of CVCs. FEMA also plans to address inequity in future operations. The *Executive Order on Ensuring an Equitable Pandemic Response and Recovery* directed a government-wide effort to address differences in COVID-19 care and outcomes within communities of color and other underserved populations. However, FEMA has not finalized its *Equity in Policy Guide and Lens*.<sup>2</sup> Additionally, FEMA's Office of Equal Rights and Privacy Office have yet to develop a system of records<sup>3</sup> that will allow the components to collect demographic data. Without the equity guide and a system of records, FEMA has no assurance equity will be properly integrated into its policies and programs and cannot accurately identify and target resources for communities of color and other underserved populations.

#### **Equity in Locations of Community Vaccination Centers**

FEMA's CRAG implemented a methodology, which prioritized states by gross population based on U.S. Census data. Once selected, FEMA, HHS, and CDC, worked with state emergency management and public health officials to plan actual CVC pilot locations, leveraging CDC's Social Vulnerability Index (SVI) (Figure 1) and county-level population data. According to FEMA, with assistance from its Federal and state partners, 39 CVCs in 27 states were established from February through June of 2021.

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<sup>2</sup> The *Equity in Policy Guide and Lens* is a tool developed for use by FEMA program offices and directorates in reviewing and developing policies, procedures, and documents. It is intended to ensure equity is properly integrated into FEMA policy documents and processes.

<sup>3</sup> According to the Department of Homeland Security website ([www.dhs.gov/system-records-notices-sorns](http://www.dhs.gov/system-records-notices-sorns)), a system of records is a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifier assigned to the individual.



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**CDC Social Vulnerability Index (SVI)**  
A tool to identify socially vulnerable communities **GRASP**

**CDC Social Vulnerability Index**

**What is social vulnerability?**  
Every community must prepare for and respond to hazardous events, whether a natural disaster like a tornado or disease outbreak, or a human-made event such as a harmful chemical spill. A number of factors, including poverty, lack of access to transportation, and crowded housing may weaken a community's ability to prevent human suffering and financial loss in a disaster. These factors are known as **social vulnerability**.

**What is CDC Social Vulnerability Index?**  
ATSDR's Geospatial Research, Analysis & Services Program (GRASP) created databases to help emergency response planners and public health officials identify and map communities that will most likely need support before, during, and after a hazardous event.

Hurricane Sandy - Breezy Point, NY  
Photographer - Pauline Tran

**Figure 1. CDC, Social Vulnerability Index**

Source: [atsdr.cdc.gov](http://atsdr.cdc.gov)

FEMA considered 15 variables, including poverty level, minority status, age, and disability, when identifying and selecting communities in need of a pilot CVC. For example, using the CDC SVI, FEMA determined that a pilot CVC should be placed in the city of Norfolk, VA, which had a minority population of 50 percent, poverty population of 19.7 percent, and 7.7 percent of the population with a walking disability. The city of Norfolk and the three surrounding metro areas (Hampton Roads Urban Area, comprising Portsmouth, Newport News, and Hampton) were identified as significantly underserved for vaccines. The proximity of the surrounding areas to Norfolk made it a good location for the pilot CVC.

According to FEMA, the operation was short-lived as there was a decrease in vaccine administration rates across all federally run CVC locations, with some pilot CVC sites falling short of maximum throughput targets. According to FEMA, “This steady decrease coincided with two primary factors ... (1) increased nation-wide vaccine hesitancy within still unvaccinated populations and (2) the exponential rise in vaccine availability to the public through more traditional vaccine providers such as primary care physicians and private pharmacies.”



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Based on our audit and considering that the option of receiving the vaccine is a personal decision and may skew results, we concluded that FEMA's CRAG, in coordination with its Federal and state partners, used the CDC SVI in an effort to identify and address, during its limited period of operation, inequities in minority and disadvantaged communities concerning the locations of CVCs.

### **Equity in Future FEMA Operations**

#### FEMA 2022–2026 Strategic Plan

FEMA's 2022–2026 Strategic Plan (Strategic Plan) outlines objectives for instilling equity as a foundation of emergency management, including:

- cultivating an organization that prioritizes and harnesses a diverse workforce;
- removing barriers to FEMA programs through a people-first approach; and
- achieving equitable outcomes for those FEMA serves.

To achieve this goal, the Strategic Plan includes measures that determine the percent of its workforce reflecting the diversity of the Nation and the percent of staff members who see equity, diversity, and inclusion valued in their work and decision-making processes. Additional measures include tracking the percentage of FEMA programs with feedback loops that integrate input from communities, monitoring the percentage of programs that require implementing partners to advance equity in their programs, and tracking those FEMA programs that evaluate and report on outcomes.

#### Equity Enterprise Steering Group

FEMA established the Equity Enterprise Steering Group (ESG) with two stated objectives: (1) create a FEMA-wide definition of equity and a framework for implementing equity into agency programs, in line with FEMA's core values: compassion, fairness, integrity, and respect; and (2) review and recommend revisions to FEMA-wide policies, procedures, plans, and guidance, in collaboration with FEMA's Enterprise Governance Boards, as appropriate, to ensure the integration of equity considerations to drive equitable outcomes.

According to FEMA's Equity ESG, equity is defined as the consistent and systematic fair, just, and impartial treatment of all individuals. According to FEMA, the Equity ESG is now working on its second objective of policy review to include a data analytics subgroup and a strategic plan subgroup. The Equity ESG developed a draft *Equity in Policy Guide and Lens* with a planned targeted publication date of June 2022. However, FEMA has not finalized or



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given a deadline for this draft to be issued. Upon finalization, according to FEMA, its program offices and directorates will use the guide as a tool to review and develop policies, procedures, and documents with the intent of ensuring equity is properly integrated. Without the equity guide, FEMA has no assurance equity will be properly integrated into its policies and programs.

### Capability Needs Analysis for Collecting Demographic Data

According to FEMA, its Equal Rights and Privacy Offices are also developing a system that will allow the component to collect and store demographic data of applicants for FEMA assistance, recipients, and subrecipients who apply for financial assistance and grants. However, FEMA did not provide evidence that it is developing a system to collect demographic data. FEMA stated that its program offices and directorates are reviewing their need to collect demographic information. After the need to collect demographic data is identified, required justifications and intended uses of the demographic information, information technology systems to securely store the information, and required Privacy Impact and Privacy Threshold Analyses will be developed and submitted for approval with the System of Records Notice.<sup>4</sup>

FEMA, historically, has not collected demographic data. According to FEMA, the enhanced data system will allow it to identify and increase targeted resources for underserved and marginalized communities. As a practical matter, it is imperative that FEMA collect demographic data in a manner consistent with Federal law to determine whether its programs provide disproportionately less assistance to disaster survivors in minority and disadvantaged communities and ensure equity in FEMA operations. Without a system of records, FEMA cannot accurately identify and target resources to underserved and marginalized communities.

Because the equity plans just described are ongoing, we plan to revisit these topics when FEMA obtains a system for the collection of demographic data or develops a system of records and completes and implements substantial policy revisions.

## Recommendations

**Recommendation 1:** We recommend the Federal Emergency Management Agency Administrator establish and provide a target completion date to finalize and implement the *Equity in Policy Guide and Lens*.

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<sup>4</sup> According to the U.S. Census Bureau website (<https://www.census.gov/about/policies/privacy/sorn.html>), a System of Records Notice is a notice published in the Federal Register, required by the *Privacy Act of 1974*, intended to alert the public that a Federal agency has created, modified, or abolished a system of records.



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**Recommendation 2:** We recommend the Federal Emergency Management Agency Administrator establish a plan for obtaining any new systems or survey present systems to determine if modifications are feasible to collect demographic data of applicants for Federal Emergency Management Agency assistance, recipients, and subrecipients. FEMA should provide the plan for obtaining any new systems or modifications of any present systems and commit that the systems will be implemented and utilized in a manner consistent with Federal law.

### Management Comments and OIG Analysis

The Acting Associate Administrator, Office of Policy and Program Analysis noted FEMA's appreciation for OIG's work planning, conducting its review, and issuing this report. (See Appendix B.)

FEMA concurred with our two recommendations. The following summarizes FEMA's response to each recommendation and the OIG's analysis.

**FEMA's Comments to Recommendation 1:** Concur. FEMA's Equity ESG Policy Working Group is finalizing the *Equity in Policy Guide and Lens* (Guide), which is currently in coordination with FEMA stakeholders. The Guide includes FEMA's strategic approach for addressing equity impacts in the development and review of new and existing policies. Once completed, the Guide will provide component personnel with tools to integrate equity into policy documents and processes, which is in direct support of the 2022-2026 Strategic Plan. Additionally, this initiative responds to Executive Order 13985, *Executive Order for Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*. Estimated Completion Date (ECD): February 28, 2023.

**OIG Analysis of FEMA's Comments:** FEMA's planned corrective actions are responsive to the recommendation, which we consider resolved and open, until we receive a copy of the finalized and piloted *Equity in Policy Guide and Lens*.

**FEMA's Comments to Recommendation 2:** Concur. FEMA's Equity ESG Equity and Data Analysis Working Group (EDAWG) is reviewing current systems to determine the feasibility of implementing modifications to collect demographic data of applicants for FEMA assistance, recipients, and subrecipients. To support this review, EDAWG surveyed FEMA-wide programs in May and June 2022. The results of this survey will be shared with the Equity ESG by September 30, 2022, and then socialized throughout FEMA during October 2022. FEMA and the Equity ESG will use the results of this



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survey and accompanying plan to support the development of courses of action for the component. ECD: January 31, 2023.

**OIG Analysis of FEMA's Comments:** FEMA's actions taken and planned corrective actions are responsive to the recommendation. In addition to FEMA's planned actions, FEMA provided evidence of Office of Management and Budget approval to collect demographic data via the Disaster Assistance Improvement Program and Individual Assistance Survivor Online Application and Resource Portal systems stored in the National Emergency Management Information System. We consider the recommendation resolved and open, until FEMA provides its plans for feasible modifications to any additional systems to collect demographic data in a manner consistent with Federal law.



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### **Appendix A**

#### **Objective, Scope, and Methodology**

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

Initially we conducted this performance audit to determine the extent to which FEMA is ensuring its CRAG is working to eliminate potential inequities in FEMA vaccine activities. According to FEMA, the CRAG was terminated in May 2021. Therefore, we modified our objective to review the extent FEMA's CRAG alleviated potential inequities in vaccine mission activities and how FEMA intends to integrate civil rights and equity in future activities.

The scope of the audit focused on the CRAG's controls to identify and eliminate inequities involving federally supported CVCs and future FEMA equity activities. To answer our objective, we emailed a questionnaire to FEMA to determine the CRAG's responsibilities and current plans to identify and eliminate inequities. We inquired about:

- the overall purpose of the CRAG;
- the FEMA entities involved;
- how the CRAG determined the locations of the CVCs;
- how inequities were identified and alleviated; and,
- lessons learned that could be applied toward future disasters.

We also asked about other decisions made concerning equity issues. In addition, we reviewed relevant criteria and Executive Orders and documentation about the 39 CVCs established to determine if the methodology used to identify and place the CVCs sufficiently addressed potential inequities experienced in minority and disadvantaged communities surrounding vaccine administration.

We also requested and reviewed FEMA's 2022-2026 Strategic Plan, reviewed the establishment of the Equity ESG, and reviewed FEMA's plans to collect demographic data about applicants, to determine what FEMA is doing to ensure equity for disadvantaged communities in the event of future disasters. We reviewed documentation associated with the CRAG's controls and methodologies in determining CVC locations because, according to FEMA officials, the CRAG was an ad hoc group and had no written policies and procedures. We did not rely on any information system-based data from FEMA to achieve our audit objective.



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We conducted this audit between November 2021 and July 2022 pursuant to the *Inspector General Act of 1978, as amended*, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

The Office of Audits major contributors to this report are Larry Arnold, Audit Director; Felipe Pubillones, Audit Manager; Alfonso Dallas Jr., Auditor-in-Charge; Emma Peyton, Auditor; Maufrend Ruiz, Program Analyst; Kevin Dolloson, Communications Analyst; and Tanya Suggs, Independent Referencing Reviewer.



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**Appendix B**  
**FEMA Comments to the Draft Report**

U.S. Department of Homeland Security  
Washington, DC 20472



**FEMA**

September 15, 2022

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.  
Inspector General

FROM: Paul Judson  
Acting Associate Administrator  
Office of Policy and Program Analysis

**PAUL C** Digitally signed by  
**JUDSON** PAUL C JUDSON  
Date: 2022.09.15  
16:58:09 -04'00'

SUBJECT: Management Response to Draft Report: “FEMA Used the CDC Social Vulnerability Index in an Effort to Address Inequities in Disadvantaged Communities Concerning Locations of COVID-19 Community Vaccination Centers and Plans to Address Inequity in Future Operations” (Project No. 21-051-AUD-FEMA)

Thank you for the opportunity to comment on this draft report. The Federal Emergency Management Agency (FEMA) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

FEMA leadership is pleased to note OIG’s recognition of the efforts of FEMA’s Civil Rights Advisory Group (CRAG), which was established in January 2021 to ensure effective collaboration across FEMA and between the multiple federal agencies regarding the integration of civil rights and equity into all vaccine mission activities. The CRAG ensured the equitable placement of FEMA Community Vaccine Centers (CVC) pilot sites by assisting in implementing a methodology that prioritized states by gross population and identified to state and local leaders underserved communities to place CVC pilot sites in based on the Centers for Disease Control and Prevention/Agency for Toxic Substances and Disease Registry Social Vulnerability Index (CDC SVI).<sup>1</sup> Through this process FEMA successfully identified areas of high population and high vulnerability as candidate locations for community vaccination center pilot sites, as well as the unique needs of underserved communities identified for those locations.

As the OIG notes, the CRAG ceased operation in May 2021 as the utilization of CVC pilot sites decreased due to nationwide vaccine hesitancy and the widespread availability

<sup>1</sup> <https://www.atsdr.cdc.gov/placeandhealth/svi/index.html>



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of vaccines at local pharmacies and primary care physician offices. Accordingly, the OIG modified the objective of this engagement to determine how FEMA will ensure civil rights and equity in its future activities. FEMA has outlined its plans to do so in its 2022-2026 FEMA Strategic Plan<sup>2</sup>, which includes the goal of instilling equity as a foundation of emergency management through cultivating a diverse workforce, removing barriers to FEMA programs through a people-first approach, and achieving equitable outcomes for those FEMA serves.

Additionally, FEMA established in April 2021 the Equity Enterprise Steering Group (ESG) with the objectives to: (1) create a FEMA-wide definition of equity and framework for implementing equity into agency programs; and (2) review and recommend revisions to FEMA-wide policies, procedures, plans and guidance to ensure integration of equity considerations to drive equitable outcomes. The Equity ESG's work includes reviewing and determining the feasibility of the collection of demographic data to better inform equitable decision making.

Through these initiatives, FEMA continues to reduce barriers and increase opportunities for all people to access FEMA programs and services. FEMA remains committed to instilling equity as a foundation of emergency management in future activities.

The draft report contained two recommendations with which FEMA concurs. Enclosed find our detailed response to each recommendation. FEMA previously submitted technical comments addressing several accuracy, contextual and other issues under a separate cover for OIG's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Enclosure

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<sup>2</sup> <https://www.fema.gov/about/strategic-plan>



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### Enclosure: Management Response to Recommendations Contained in Project No. 21-051-AUD-FEMA

OIG recommended the FEMA Administrator:

**Recommendation 1:** Establish and provide a target completion date to finalize and implement the Equity in Policy Guide and Lens.

**Response:** Concur. FEMA’s Equity ESG Policy Working Group is finalizing the “Equity in Policy Guide and Lens” (Guide), which is currently in coordination with agency stakeholders, and includes FEMA’s strategic approach for addressing equity impacts in the development and review of new and existing policies. Once complete, the Guide will provide agency personnel with tools to integrate equity into policy documents and processes, which is in direct support of the agency’s 2022 -2026 Strategic Plan. Additionally, this initiative responds to Executive Order 13985 “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government,” dated January 20, 2021.<sup>3</sup> Estimated Completion Date (ECD): February 28, 2023.

**Recommendation 2:** Establish a plan for obtaining any new systems or survey present systems to determine if modifications are feasible to collect demographic data of applicants for Federal Emergency Management Agency assistance, recipients, and subrecipients. FEMA should provide the plan for obtaining any new systems or modifications of any present systems and commit that the systems are in a manner consistent with Federal law.

**Response:** Concur. FEMA’s Equity ESG Equity and Data Analysis Working Group (EDAWG) is reviewing current systems to determine the feasibility of implementing modifications to collect demographic data of applicants for FEMA assistance, recipients, and subrecipients. To support this review, EDAWG surveyed Agency-wide programs in May and June 2022. The results of this survey will be shared with the Equity ESG by September 30, 2022, and then socialized throughout FEMA during October 2022. The results of this survey and accompanying plan will be used by FEMA and the Equity ESG to support the development of courses of action for the agency. ECD: January 31, 2023.

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<sup>3</sup> <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>



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**Appendix C**  
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