



U.S. DEPARTMENT OF AGRICULTURE

**OFFICE OF THE ASSISTANT SECRETARY FOR CIVIL RIGHTS**

# **Equity Action Plan**

**(July 2023)**



[WWW.USDA.GOV/EQUITY/ACTION-PLAN](http://WWW.USDA.GOV/EQUITY/ACTION-PLAN)

## Contents

<b>Introduction: Mission Statement .....</b>	<b>1</b>
<b>Message from the Deputy Assistant Secretary .....</b>	<b>1</b>
<b>Accomplishments.....</b>	<b>3</b>
<b>Equity Actions.....</b>	<b>3</b>
Equity Action 1. Transform USDA Program Complaint Processing .....	3
Equity Action 2. Improve the Department’s civil rights infrastructure, so civil rights improvements are part of a regular learning cycle.....	4
Equity Action 3. Develop a comprehensive language access program, including establishing a Department-wide plan to provide resources, transparency, accountability, goals, and objectives for the offices and Mission Areas. ....	5
Equity Action 4. Foster a civil rights community across USDA by working with mission area and agency civil rights leaders to establish a community of practice and share processes, resources, and innovations.....	5
<b>Selected Equity Resources and Information.....</b>	<b>7</b>
USDA Equity-Related Summary Reports and Guidance.....	7
Selected Equity-Related Executive Orders and White House Resources.....	7
OASCR Equity Resources.....	7
<b>USDA Mission Statement.....</b>	<b>8</b>
<b>Department Equity Action Plan Goals .....</b>	<b>8</b>

## Introduction: Mission Statement

It is the mission of the USDA Office of the Assistant Secretary for Civil Rights to provide leadership and direction for the fair and equitable treatment of all USDA customers and employees, while promoting the delivery of quality programs and enforcement of civil rights. OASCR ensures compliance with applicable laws, regulations, and policies that protect the U.S. Department of Agriculture (USDA) customers and employees regardless of race, color, national origin, sex (including gender identity and expression), religion, age, disability, sexual orientation, marital or familial status, political beliefs, parental status, protected genetic information, or because all or part of an individual's income is derived from any public assistance program. (Not all bases apply to all programs.)

USDA prohibits discrimination against its customers. If you believe you have experienced discrimination when obtaining services from USDA, or participating in a USDA program or a program that receives financial assistance from USDA, you may file a complaint with USDA. OASCR, through our Center for Civil Rights Enforcement, will investigate and resolve complaints of discrimination in programs operated or assisted by USDA. The link to file a program discrimination complaint is [here](#).

## Message from the Deputy Assistant Secretary



*Penny Brown-Reynolds, Ph.D.  
Deputy Assistant Secretary for Civil Rights*

As Deputy Assistant Secretary for Civil Rights, I have been given the privilege to lead the Office of the Assistant Secretary for Civil Rights (OASCR) by USDA Secretary Thomas J. Vilsack. Our office is tasked with providing overall leadership, coordination, and direction for the Department's civil rights initiatives, including program delivery, compliance, and equal employment opportunity. I believe civil rights is the soul of justice; therefore, its significance cannot be overestimated.

We must look both internally and externally to ensure Department-wide efficient, fair, transparent, consistent, and equitable application of civil rights as we serve our stakeholders—USDA mission areas,

agencies, and staff offices, applicants, employees, and program recipients, including farmers, ranchers, children, families, indigenous communities, and underserved communities, educational institutions, and others. It is our priority to incorporate the Administration's strategy for advancing equity and its commitment to civil rights by continuing to promote civil rights throughout the Department.

OASCR is effectuating change to lower barriers to access and give underserved communities the chance to eradicate decades of systemic racism and discrimination.

In correcting our past, and moving forward to the future, OASCR is now positioned to address concerns from internal and external stakeholders regarding its ability to meet its mission goals and objectives efficiently and effectively. With hindsight, foresight, and insight, OASCR is becoming an organization that:

- Cultivates trust in its processes to accurately reflect efficient and timely processing of complaints of discrimination for USDA's stakeholders--employees and customers.
- Evaluates USDA's programs and services using decision-focused research based on equitable principles (Civil Rights Impact Analyses; agency head assessments of equitable and civil rights services provided; assessments of limited English proficiency; Management Directive 715); and
- Has a deep understanding of USDA, enabling identification of key leverage points to shape the culture and make equity and civil rights more relevant. Among these are USDA and OASCR strategic plans, interactions with the Equity Commission, and civil rights compliance reviews.

OASCR's Equity Action plan focuses on four action areas. For each, OASCR is already well started in reviewing our current processes to improve civil rights enforcement and accountability. The actions and goals described are ambitious but achievable, and we are focused on not just planning change but accomplishing it. To that end, OASCR is closely tracking progress on the action items, ensuring that the changes needed are implemented promptly, and that they are working. For example, we track progress on program complaint processing timeframes weekly. If our plans to reduce processing times are not accomplishing their intended ends, we will adjust those plans. In addition, we have included these actions as components of OASCR's staff's performance plans.

For OASCR to succeed—and for USDA to succeed—requires more than aspirations; it requires institutionalizing those aspirations into solid processes that serve our customers. We are wholly committed to success in the equity actions presented in this plan and look forward to reporting additional progress in the next one. Our prime directive is to provide stellar customer service.

*—Penny Brown Reynolds, Ph. D.  
Deputy Assistant Secretary for Civil Rights*

## Accomplishments

1. Issued new Secretarial signed statements on Civil Rights and Anti-Harassment.
2. Updated three key civil rights directives: 1) Departmental Regulation 4330-0002, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA; Departmental Regulation 4300-007, Processing Equal Employment Opportunity (EEO) Complaints of Discrimination; and Departmental Regulation 4200-003, Anti-Harassment Program.
3. Launched the OASCR Consolidated Complaint Activity Dashboard providing current data to the Office of the Secretary and the civil rights community on employment and program complaint processing.
4. Launched the Civil Rights Impact Analysis (CRIA) dashboard tracking current metrics for all USDA policies, advisory committees and other regulation documents needing Departmental clearance.
5. Updated the USDA Civil Rights mobile application for all employees and customers providing easy access to current civil rights news and resources on the complaint process.
6. Launched the USDA enterprise-wide Civil Rights Management System (CRMS), a tracking system capturing all data related to program complaints filed at USDA.
7. Increased capacity in the Program Directorate to address the timely processing of all filed complaints of discrimination to occur within 225 days effective October 1, 2023 .

## Equity Actions

OASCR is focusing on the following equity action items:

### Equity Action 1. Transform USDA Program Complaint Processing

OASCR will administer USDA's civil rights complaint process to ensure that program complaints are processed in accordance with requirements and are timely and efficiently resolved.

- OASCR will streamline and refine the office's program complaint processing, reviewing the current intake, investigation, and adjudication processes, in order to reduce program complaint processing time frames, and complete aged complaints. As appropriate, OASCR will revise processes and policies and implement changes/improvements.
- OASCR will issue Departmental Manual 4330-001, Procedures for Processing Program Discrimination Complaints to establish the process and procedures for administrative complaints of discrimination and set guidance for the Mission Areas and agencies of USDA in handling administrative complaints filed in any program or activity conducted by USDA.
- OASCR will meet an ambitious timeline target—225 days—for program complaint processing.

- As part of a comprehensive change management strategy, OASCRa has created a Program Complaints Task Force to triage aged cases and eliminate the delay in processing program complaints currently assigned to the U.S. Department of Housing and Urban Development (HUD) and USDA Rural Development (RD). The Task Force will quickly and effectively frame the claims and utilize RD's checklist for investigations, completing Reports of Investigations (ROI) within four weeks, and will produce a Final Agency Decision within one additional week.
- OASCR will address all the recommendations made by the Office of Inspector General (OIG) in its September 2021 [evaluation](#) of OASCR's oversight of USDA's civil rights complaint process. OIG made 21 recommendations, including: (1) updating guidance to improve complaint resolution timeliness, (2) reviewing information technology guidance and plans to ensure OASCR can meet federal and departmental requirements, (3) reviewing processes to ensure sufficient documentation and support, (4) requiring agencies and OASCR to review and assess compliance with USDA civil rights regulations and policies, and (5) reviewing and updating the strategic plan. As of this Equity Action Plan's date, only 4 recommendations [remain open](#): OASCR will address these 4 by the end of 2023.
- OASCR will implement a fast-track emergency intervention program complaint process to allow timely solutions in cases that involve urgent needs.

[Equity Action 2. Improve the Department's civil rights infrastructure, so civil rights improvements are part of a regular learning cycle.](#)

OASCR will implement ongoing processes to improve Department policies and will work with agency civil rights programs to make agency civil rights impact analyses more effective

- OASCR will assess Civil Rights Impact Analysis (CRIA) processes and take appropriate actions to make the needed improvements. We will develop and implement agency-wide technical training.
- OASCR will implement routine procedures to analyze complaints and complaints data to shed light on USDA programs, policies, and procedures, building feedback loops from the complaint process to agency and mission areas training, policy, and communications.
- OASCR will establish and implement an agency-head civil rights tool and performance evaluation process.
- OASCR will build learning cycles into its processes, institutionalizing its commitment to continuously enhance OASCR's own operations and service delivery, and ensuring that

the improvements above are the start rather than the finish of building a learning organization.

Equity Action 3. Develop a comprehensive language access program, including establishing a Department-wide plan to provide resources, transparency, accountability, goals, and objectives for the offices and Mission Areas.

OASCR will strengthen USDA's language access program, ensuring meaningful access to Department programs, services, and activities for people with limited English proficiency. The first step is a new Departmental language access plan update and additions to existing language access governance documents. More broadly, OASCR will lead the Department in building a more robust language access system, for the "federally conducted" programs the Department runs itself, and the "federally assisted" programs on which the Department partners with states, localities, and other grantees.

- By August 2023, OASCR will lead the Department in developing a new Language Access Plan to cover both federally conducted and federally assisted activities. It will:
  - Offer guidance for USDA agencies and offices to use to develop their own language access plans, including minimum standards and a description of required components for each agency/mission area language access program.
  - Direct periodic reporting timing and content for offices/agencies.
  - Describe process and roles for the Department's ongoing exploration of emerging technology—artificial intelligence/machine learning, remote interpretation, and other similar technologies—that may allow more effective and more efficient language access strategies.
  - Describing the structure/criteria and scope for an ongoing Departmental effort to assess where enterprise-wide services would work better than the existing agency-by-agency approach.
- OASCR will stand up a Departmental language access coordinating committee, which will develop additional Department resources, such as FAQs and reference guides for USDA staff, and provide a governance structure for implementation of the Department's language access plan, as well as those of the agencies/offices.

Equity Action 4. Foster a civil rights community across USDA by working with mission area and agency civil rights leaders to establish a community of practice and share processes, resources, and innovations.

OASCR will enhance communication and increase collaboration across USDA's civil rights offices, fostering an efficient, effective, and service-oriented Civil Rights culture at USDA. In particular, OASCR will:

- Conduct coordinated monthly Civil Rights Directors meetings to provide guidance and information sharing.
- Conduct quarterly listening sessions with individual Civil Rights Directors on resource needs and challenges.

---

For more information on equity at OASCR, and all of USDA, see [usda.gov/equity](https://usda.gov/equity)



## Selected Equity Resources and Information

### USDA Equity-Related Summary Reports and Guidance

#### Programmatic Equity at USDA

- [Equity Website](#)
- [Equity Accomplishments](#)
- Equity Action Plan: [Full Plan | Summary](#) (February 2022)
- [USDA Environmental Justice Scorecard](#)
- [USDA Advisory Committees](#)

#### Equity Commission

- [Equity Commission Website](#)
- [2023 Interim Report | USDA Response \(English\)](#) (February 2023)
- [Informe Interino 2023 | Respuesta al Informe Interino de la Comisión de Equidad del USDA | \(En Español\)](#) (Febrero 2023)

### Selected Equity-Related Executive Orders and White House Resources

- [White House Equity Page](#)
- [Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#)
- [Executive Order 14091, Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](#)
- [Executive Order 14096, Revitalizing our Nation's Commitment to Environmental Justice for All](#)
- [Executive Order 13175, Consultation and Coordination with Indian Tribal Governments](#)
- [Presidential Memorandum on Tribal Consultation and Strengthening Nation-to-Nation Relationships](#)
- [The Path to Achieving Justice<sup>40</sup>](#)

### OASCR Equity Resources

- [Filing a Program Discrimination Complaint](#) as a USDA Customer
- ["And Justice for All" Posters](#)
- [Civil Rights Policy Statements](#)
- [Civil Rights Directives](#)
- [USDA Special Emphasis Programs](#)
- [Information on Reasonable Accommodations](#) for People with Disabilities
- [Nondiscrimination in USDA-Conducted Programs and Activities](#)

## USDA Mission Statement

“To serve all Americans by providing effective, innovative, science-based public policy leadership in agriculture, food and nutrition, natural resource protection and management, rural development, and related issues with a commitment to delivering equitable and climate-smart opportunities that inspire and help America thrive.”

## Department Equity Action Plan Goals

### 1. **Reducing Barriers to USDA Programs**

USDA is reducing barriers to programs and improving support to underserved farmers, ranchers, landowners, businesses, and communities, including by providing ways for stakeholders to share their experiences, insights, and needs and by incorporating that input into policy development and implementation improvement.

### 2. **Partnering with Trusted Technical Assistance Providers**

USDA is partnering with trusted technical assistance providers to ensure that underserved producers and communities have the support they need to access USDA programs.

### 3. **Directing USDA Programs to Those Who Need Them the Most**

USDA programs are targeting those who need them the most, including by increasing infrastructure investments that benefit underserved communities.

### 4. **Expanding Equitable Access to USDA Nutrition Assistance Programs**

USDA is expanding equitable access to USDA nutrition assistance programs to ensure that those who qualify are able to participate, those who participate get benefits that are meaningful, and those who receive those benefits can use them conveniently and in ways that promote improvements in their health and well-being.

### 5. **Advancing Equity in Federal Procurement**

USDA is advancing equity in Federal procurement, by providing underserved and disadvantaged businesses, tools and resources to increase access to funding opportunities and expand their network to develop critical local, State, regional, and National relationships.

### 6. **Upholding Federal Trust and Treaty Responsibilities to Indian Tribes**

USDA is upholding Federal trust and treaty responsibilities to Indian Tribes, removing barriers to access USDA programs, embracing Tribal self-determination principles, and incorporating indigenous values and perspectives in program design and delivery.

### 7. **Committing Unwaveringly to Civil Rights**

USDA has committed unwaveringly to civil rights, working to equip its civil rights offices with the tools, skills, capacity, and processes essential to enforce and uphold civil rights effectively and efficiently.

### 8. **Operating with Transparency and Accountability**

USDA is operating transparently and accountably, providing information on Department programs that Congress, stakeholders, and the general public need to hold us to account on our equity agenda, and working systematically to collect and take account of public feedback.



USDA

USDA is an equal opportunity provider, employer, and lender.