February 12, 2025

Via Email to RacialEquityCommission@opr.ca.gov

California Racial Equity Commission
c/o Commission Members
c/o Commission Staff

Re: Comments on the California Racial Equity Commission process and the pending framework draft

Dear California Racial Equity Commission:

Thank you for the opportunity to comment on the Racial Equity Framework being proposed and developed by the California Racial Equity Commission (REC). This comment letter is respectfully submitted on behalf of the undersigned aging and disability advocates. We appreciate the Commission allowing stakeholders to support the development of a statewide Racial Equity Framework. In order to accomplish the REC's goal of recommending best practices and opportunities to address racial equity for the State of California, we urge the Commission to propose a framework that addresses intersectional discrimination against older adults and

disabled people of color.[1] Adding intersectionality inclusive of aging and disability in the framework would significantly enhance California's ability to advance racial equity and address the unique and compounding effects of intersectional discrimination among these groups.

As the Commission proposes and develops its framework, the REC has an important opportunity to acknowledge and eliminate intersectional discrimination and also age-based and disability discrimination. The COVID-19 pandemic demonstrated the destructive impact of ignoring systemic inequities based on age, disability, and race, leading to more deaths in nursing facilities with greater proportions of residents of color and certain older Californians of color proportionally under-vaccinated.[2] These trends occurred despite the state's ongoing commitment to an equitable recovery, signifying how deeply embedded these systemic inequities are. As another example, Black older adults who grappled with legalized discrimination prior to 1965 and systemic issues of oppression at the intersection of racism, ageism, and sexism often deal with compounding trauma.[3] By employing an intersectional analysis, policies can better address the unique needs and experiences that arise at the intersection of age, disability and other identities.[4] A framework conscious of the impacts of discrimination over a lifetime can facilitate solutions that center on older adults of color, disabled people of color, and others who face intersectional discrimination.

The Commission is wise to look to frameworks from other jurisdictions to inform its work. On the issue of intersectionality, Oregon's equity framework makes clear the need for inclusion of individuals who identify with multiple communities and are impacted by compounding systems of oppression. A framework with intersectionality inclusive of age and disability is consistent with California's pioneering efforts through the State's Master Plan for Aging. The MPA, first launched in 2020, is a blueprint for aging across the lifespan and includes the goals of Housing for All Ages & Stages, Health Reimagined, Inclusion & Equity, Not Isolation, and Caregiving That Works Affording Aging.[5] By 2030, one in four Californians will be 60 or older.[6] Over the next 2 years, California will advance 81 MPA initiatives leading with equity, community engagement, innovation and delivering results.[7] The development of the REC's framework in coordination

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[1] Cal. Exec. Order No. N-16-22 (mandating state entities to embed and institutionalize racial equity strategies across their policies, programs, and initiatives).

[2] Weech-Maldonado R, Lord J, Davlyatov G, Ghiasi A, Orewa G., "High-Minority Nursing Homes Disproportionately Affected by COVID-19 Deaths," Front Pub. Health, Mar. 2021 (explains the nuanced relationship between nursing home racial/ethnic mix and COVID-19 resident mortality).

[3] SE LaFave, JJ Suen, Q Seau, A Bergman, MC Fisher, RJ Thorpe Jr, and SL Szanton, "Racism and Older Black Americans' Health: a Systematic Review," J. of URB. Health, Feb. 2022, at 28–54 (explains the compounding trauma Black older potentially deal with).

[4] Denny Chan, "Fulfilling the Promise of Equity for Older Adults: OPPORTUNITIES IN LAW & POLICY," Justice in Aging Oct. 2023. (discussing the equity in two different contexts: (1) equity based on age and (2) equity based on other identities, like race, gender, LGBTQ+ identity, and their intersections with age).

[5] Master Plan for Aging Home Page, Master Plan for Aging (last visited October 17, 2024).

[6] "January 2024 Master Plan for Aging Third MPA Annual Report," 3 Master Plan on Aging, 2, 2 (2024) (explains the progress for year three of the master plan on aging and future goals).

[7] "California's Master Plan FOR AGING 2025-26 INITIATIVES," 4 Master Plan on Aging 2025-26 Initiatives, 3, 3 (2025) (explains all 81 initiatives and further shows the continued efforts for older adults and aging community).

with the MPA allows for California to be both an anti-racist and pro-aging and disability state. The MPA strives for joint collaboration through initiative 52 by prioritizing older adults and people of disabilities to be represented in the Racial Equity Framework. Aligning these efforts is an opportunity for the REC to break down government silos and work directly with the California Department of Aging and other government entities to implement the MPA, centering equity and anti-racism. We ask that REC Commissioners and staff meet with the California Department of Aging and relevant advisory groups for the MPA with expertise on equity and aging in accordance with the Commission's powers to engage with advisers or advisory committees to ensure coordination between these two efforts and strategize how best to advance race equity for older Californians of color and people with disabilities of color.[8] To further emphasize this point, we ask that the REC consider hosting listening sessions with older adults of color and disability groups to allow for inclusion of their voice.

The Commission has an opportunity to advance equity for older adults by adopting an intersectional approach to its proposed framework. Another concrete example is with respect to data collection and reporting. As unified data reporting standards emerge, so should data collection practices. The framework proposed by the REC should set forth a California where data collected and reported by state entities would be intersectional and disaggregated, so that advocates and others can better understand the experiences of specific communities, e.g. older women of color or younger disabled LGBTQ+ Californians. We appreciate that sharing personal detailed demographic information on race, ethnicity, SOGI, language, disability, and age can be a sensitive matter.[9] The framework should also account for potential barriers that may offset accurate and reliable data collection.

Finally, we appreciate the REC's commitment and support for community participation. We anticipate the REC will allow for more opportunities for public participation in the framework drafting process to help ensure true equity and inclusion. Procedural transparency allows for greater public participation and accountability during the framework comment and implementation period. Although updates of the Framework Committee are appreciated, we ask for a more robust sharing of proposed draft language of the framework with ample time for public feedback. Review of the draft framework is an important component to holding all accountable and hearing from the state's many diverse voices. We propose that the Committee take time to report and maintain public-facing drafts of the framework. Allowing for public transparency by releasing draft framework language is critical in the REC's work to promote community trust.

In closing, we continue to appreciate the thoughtful consideration the REC has already demonstrated and the opportunities for public input and engagement during this process. We were encouraged during Commissioner Salas's recent inquiry about the representation of older

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[8] Ca. Exec. Order No. N-16-22 Sec. 8.g.ii("The commission shall have the authority to: engage with advisers or advisory committees when the commission determines that the experience or expertise of advisers or advisory committees is needed for commission work").

[9] Turesky, M., "Aging Back into the Closet: Community Planning for Older LGBTQ + Adults," 37 J. of PLAN. Literature., 67,70 (2022) (highlighting the experiences of older LGBTQ+ adults based on intersectional theory).

adults in future data for a more inclusively designed framework that accounts for older Californians of color. We commend the Commission's engaging approach and look forward to working with you to ensure the adoption of a meaningful framework that advances equity for all Californians, including older adults and people with disabilities.

Respectfully,

AAPI Equity Alliance

Advocates for African American Elders

Aging and HIV Institute

Aging While Black

Alzheimer's Los Angeles

Archstone Foundation

Bet Tzedek Legal Services

California Association of Area Agencies on Aging

California Behavioral Health Association

California Commission on Aging

Cultiva La Salud

Disability Rights California

Human Services Association

Justice in Aging

Little Tokyo Service Center

MSA (Multipurpose Senior Services Program Site Association)

NextGen CA

Openhouse

Prevention Institute

Public Health Advocates

Sistahs Aging with Grace & Elegance

SSG Silver

Western Center on Law and Poverty