

October 3, 2022

To: Office of Science and Technology Policy

Re: Request for Information on Equitable Data

The Center for Law and Social Policy (CLASP) is a national, nonpartisan, nonprofit organization whose mission is advocating for policies that advance economic and racial justice. Founded more than 50 years ago, CLASP works to develop and implement federal, state, and local policies (in legislation, regulation, and on the ground service delivery) that reduce poverty, improve the lives of people with low incomes, dismantle barriers arising from systemic racism, and create pathways to economic opportunity.

We appreciate the opportunity to comment on equitable data collaboratives. While data collection and other data cycle processes are powerful tools to inform key policy decisions, these data processes were created within the same systems, institutions, and structures that have been shaped by the historic and present impacts of white supremacy culture and systemic racism. This means that each component in the data cycle may collectively and individually reflect and uphold systemic inequities that center on race.

Understanding that the approaches used to gather and analyze data are not inherently neutral, CLASP highlights the importance of widening the scope of approaches and tools used to collect data about issues, which may include both quantitative, qualitative, and mixed-method approaches that include data that may come in non-traditional formats (such as storytelling) to illuminate the lived experiences of disenfranchised communities of color.

We have identified the following best practices for inclusive and equitable data and for incorporating inclusive community engagement frameworks into expanded data strategies:

- Interrogate whose knowledge (i.e., evidence, lived experiences, and perspectives) is considered central to the policymaking and advocacy process, and whose is not.
- Analyze data with the intention of understanding inequities;
- When possible, disaggregate data to honor and unpack the trends and experiences of different groups; when it is not possible, consider whether there are other types of information that can be brought to bear;
- Lead with the voices of those who are impacted in defining the problem, designing the solutions, and during implementation;
- Involve directly impacted people/communities not just as people to survey, but in developing data strategies including constructing survey questions, creating outreach strategies, interpreting and organizing qualitative responses, etc.
- Engage in authentic conversations with directly impacted community members to capture their perspectives;
- Respectfully partner with community-based connectors and organizing entities to build trust and authentic reciprocal relationships; and
- Ensure that the results of research are shared in ways that are accessible to the people it's about and who

may be impacted by policy based on that research – e.g., findings should be shared through blogs, videos, or interactive websites not just in a long technical paper that may be behind a paywall.

For a deeper discussion of these issues, CLASP recommends our 2021 paper, [Shaping Equitable Early Childhood Policy: Incorporating Inclusive Community Engagement Frameworks into Expanded Data Strategies](#), by Alycia Hardy and Alyssa Fortner. Although this paper was specifically written with regard to early childhood policy, the overall framework and many of the recommendations and resources included are of broader relevance.

Other resources that we have found useful and that we recommend for your consideration:

[Data equity framework created by We All Count](#). This framework breaks down data work into seven stages: funding, motivation, project design, data collection and sourcing, analysis, interpretation, and communication & distribution; and discusses key equity decision points within each of these stages. We All Count also provides training programs and a discussion community.

[AAPI Data Equity Project](#). Data equity is a particular concern for the AANHPI population, because they are often lumped into an “other” category in data analysis. Even when AANHPI is identified as a distinct group, the differences between various ethnic communities within the AANHPI population means that aggregate numbers can be misleading. In particular, we draw attention to the AAPI Data Equity Project’s recent report: [2022 AANHPI Roadmap for Data Equity in Federal Agencies](#) (in collaboration with National Council of Asian Pacific Americans), which assesses the current state of data equity efforts and includes recommendations for next steps.

[Learning and Action in Policy and Partnerships](#). To strengthen alignment and data sharing among the public health, health care, and social services sectors, the Robert Wood Johnson Foundation is supporting the Learning and Action in Policy and Partnerships (LAPP) national initiative, which is led by Data Across Sectors for Health in partnership with the Center for Health Care Strategies (CHCS). This project has supported 11 partnerships across two funding rounds. A recent report, [A Community-Centered Approach to Data Sharing and Policy Change: Lessons for Advancing Health Equity](#), August 2022, provides lessons from the first round of funded partnerships.

We have also heard very positive things from our partners about the [Hartford Data Collaborative \(HDC\)](#), a network of Hartford area non-profit organizations, government agencies, and philanthropic partners that facilitates data sharing and data integration among its partners.

Thank you for your consideration.