

Written Testimony of Whitney J. Tome, J.D.

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U.S. House Committee on Natural Resources | Subcommittee on Oversight and Investigations

Good afternoon, Chairman TJ Cox, Ranking Member Louie Gohmert and other members of the Subcommittee, thank you for the opportunity to share information about the critical issues of diversity, equity inclusion, and justice facing federal environmental agencies.

My name is Whitney Tome and I am the Principal and Head of the Beyond Diversity Strategies Practice at The Raben Group and the former executive director of Green 2.0. While leading Green 2.0 for four years, I observed challenges to and sought to transform the racial and ethnic makeup of the boards and staff at mainstream environmental nonprofits, foundations and federal government agencies. Green 2.0 continues to do this work with the leadership of Andres Jimenez, who looks forward to working closely with Congress on holding these institutions accountable.

Addressing diversity, equity, inclusion and justice is critical to improving environmental outcomes for all people. For far too long frontline communities and people of color have borne the brunt of environmental injustice. People of color have been omitted from decision making, their health and lives have been sacrificed, and their voices have been silenced when it comes to solutions that would have provided them with clean water, clean air, and healthy food and products. These injustices have too often been determined by race and geography.

The Federal Government needs to live up to its purpose by treating all people equitably and justly. It requires analyzing and addressing the inequities within governmental institutions from workforce to policy. Government needs to transform its institutions so that everyone has access to all aspects of the environment - ecological (biological), physical (natural and built), social, political, aesthetic, and economic.

We need to begin with a clear framing around diversity, equity, inclusion and justice which have consistently been used interchangeably and often incorrectly. Diversity is simply representation or the characteristics that make a group of people different. Inclusion is the development and constant cultivation of an environment where everyone can participate and feels a sense of belonging. Equity begins to address systems change by identifying and removing the barriers to guarantee fair treatment, access, opportunity and advancement that have historically prevented marginalized groups from fully participating. Justice, specifically social justice, is a vision of society where the resources are distributed equitably, all members are physically and psychologically safe, and every actor has their own sense of agency and social responsibility. These key concepts are critical to understand in order to seek change in our federal environmental agencies. We need to be working at the level of equity and justice to address systemic issues that are baked into 401 years of our government structure and processes that perpetuate inequality. Injustice and inequity have accrued in so many government agencies,

from seeking and receiving federal relief, to health care, to mortgage loans, to environmental access to clean water and clean air. From the experience of Flint, Michigan to Newtok, Alaska, we have allowed frontline communities - specifically communities of color and native communities - to carry the full weight of contaminated water or move an entire village due to climate change.

The September 4, 2020 memorandum from the Office of Management and Budget¹ is seriously concerning and will create a chilling effect across all government agencies. To ban our government employees - those who interact with the public and serve the public interest - to not be educated about the impacts of race is to ignore 401 years of history. It is the silencing and/or continued oppression of stories that are told through our National Parks from the African Burial Grounds, Caesar Chavez, Stonewall Inn, Belmont Paul, Knife River Indian Villages, Tule Lake and more than two-thirds of the nation's cultural resources. It ignores the fact that federal government agencies are severely behind in the representation of people of color in their workforce. As Dr. Dorceta Taylor's report *The State of Diversity in Environmental Organizations* commissioned by Green 2.0 illuminated as of 2014 only 15.5% of the 74 government agencies were staff of color and NGOs and foundations were only at 12.4% and 12% respectively.² The most current publicly available demographic data from the Office of Personnel Management's Diversity & Inclusion Workforce at a Glance only covers 2010 to 2014.³ It only shows between one and three percentage point increase in people of color across the major federal environmental agencies - EPA, Interior, NOAA and Forest Service.⁴ People of color in the U.S. workforce continue to increase overall, yet these environmental agencies have hardly made any gains in the last 20 years and will continue to be woefully behind without substantial investment, changes in behavior and multiple systems of accountability.⁵

Given the infinitesimal progress to date, it is critical for:

1. these federal environmental agencies to utilize the myriad of best practices published and proven to be effective, and
2. for Congress to hold these agencies accountable annually for making progress.

The GAO Report on *Diversity Management: Expert-Identified Leading Practices and Agency Examples* highlights many best practices including top leadership commitment, integration of diversity and inclusion into strategic plans, utilizing qualitative and quantitative measures/metrics,

¹ Vought, Russell. Office of Management and Budget. 2020. Training in the Federal Government. <https://www.whitehouse.gov/wp-content/uploads/2020/09/M-20-34.pdf>

² Taylor, Dorceta. *The State of Diversity in Environmental Organizations*. Green 2.0. 2014. <https://www.diversegreen.org/the-challenge/>

³ Office of Personnel Management. Diversity & Inclusion. Federal Workforce-At-A-Glance. <https://www.opm.gov/policy-data-oversight/diversity-and-inclusion/federal-workforce-at-a-glance/>

⁴ Ibid.

⁵ Vespa, Jonathan, Lauren Medina and David M. Armstrong. *Demographic Turning Points for the United States: Population Projections from 2020-2060*. Revised February 2020. <https://www.census.gov/content/dam/Census/library/publications/2020/demo/p25-1144.pdf>

and tying performance goals to diversity.⁶ Since 2005, many key articles and peer reviewed journal articles have added to these best practices:

- *Why Diversity Programs Fail* from the Harvard Business Review.⁷
 - Highlights the positive impact of voluntary training, cross-training, college recruitment targeting women and minorities, mentoring, diversity task forces and diversity managers.
- *The Six Signature Traits of Inclusive Leadership: Thriving in a diverse new world* from Deloitte University Press.⁸
 - Identifies a series of core competencies for leadership to cultivate and assess in order to build inclusive teams.
- *How to Promote Racial Equity in the Workplace* from the Harvard Business Review.⁹
 - How to analyze a workplace with a racial equity lens from problem definition to correcting the problem.

There are critical best practices, from the experience of practitioners, that have not been embedded throughout federal environmental agencies. They include:

- *Providing significant financial resources for each agency/department.* When working at the scope and scale of government, the financial resources committed to diversity, equity, and inclusion should be at least 1% of the overall agency budget. In order to address systemic issues, anything less will continue the unacceptable results that we have now.
- *Investing in human capital within each agency/department.* When extracting the Human Resources and EEO divisions of each agency, there are often only a few people who are focused on or leading diversity, equity and inclusion efforts. As an example, one of the largest agencies in the Department of the Interior, an agency with over 20,000 employees, has just 1 full-time staff member plus 2 support staff on diversity, inclusion and relevance. It is impossible for a staff of one to have an impact on a systemic issue across 20,000 employees especially with a small budget.
- *Supporting long-term change management.*¹⁰ Diversity, equity and inclusion work is long-term change management and cultural change, therefore it needs the same level of infrastructure, constant learning and evaluation like any strategic plan. The culture of many federal agencies force assimilation and uniformity which limits creativity and innovation which is much needed across all of government.
- *Assessing and making pay equitable for all employees regardless of identity and hierarchy.* Pay for several of the seasonal, junior or entry-level positions within agencies,

⁶ United States Government Accountability Office. Report to the Ranking Minority Member, Committee on Homeland Security and Governmental Affairs, U.S. Senate. *Diversity Management: Expert-Identified Leading Practices and Agency Examples*. January 2005. <https://www.gao.gov/new.items/d0590.pdf>

⁷ Dobbin, Frank and Alexandra Kalev. "Why Diversity Programs Fail." Harvard Business Review. July/August Issue. 2016. <https://hbr.org/2016/07/why-diversity-programs-fail>

⁸ Bourke, Juliet and Bernadette Dillon. *The six signature traits of inclusive leadership: Thriving in a diverse new world*. Deloitte University Press. 2016. <https://www2.deloitte.com/us/en/insights/topics/talent/six-signature-traits-of-inclusive-leadership.html>

⁹ Livingston, Robert. "How to Promote Racial Equity in the Workplace." Harvard Business Review. September-October Issue. 2020. <https://hbr.org/2020/09/how-to-promote-racial-equity-in-the-workplace>

¹⁰ Society of Human Resource Management (SHRM). [Managing Organizational Change Toolkit](#).

depending on geography, is low and as a result limit applicants, especially women and people of color, who typically do not have additional financial resources to accept employment that does not provide a livable wage and quality benefits.

- *Tracking attrition rates to address retention barriers.* Based on the May 2019 GAO Report *Federal Retirement: OPM Actions Needed to Improve Application Processing Times*, one-third of the federal workforce is eligible for retirement.¹¹ Meanwhile, the federal workforce has almost double the number of employees over the age of 60 than under the age of 30.¹² The expected knowledge drain in the federal government coupled with the limited recruitment and retention of young people¹³ will result in decreased environmental protection and enforcement. The cascading and multiplying effects on people of color will be far ranging.

In addition to all of the best practices referenced above, the Subcommittee on Oversight and Investigations must support and hold agencies accountable through the following means:

- Establish several government-wide bodies including requiring OPM's Diversity & Inclusion to coordinate with and hold convenings for all federal agencies to learn from each other and share their best practices at least twice a year.
 - Re-establish a specific Interagency Task Force focused on diversity, equity, inclusion and justice for federal environmental agencies with the ability to leverage experience and expertise beyond environmental agencies.
- Track the amount of financial and human resources dedicated to diversity, equity and inclusion in each agency separate from EEO and HR.
- Require federal environmental agencies to develop and implement equity and inclusion competencies for every single position within an agency and to use those competencies as one weighted metric for promotions and advancement.
- Allow federal agencies to gather information from their partners - mainly colleges and/or universities - about the demographic diversity of their student body, faculty and the curriculum requirements that include classes on race and gender.

I thank you again for the opportunity to appear today. I am happy to respond to questions that you may have.

¹¹ United States Government Accountability Office. *Report to Congressional Requesters. Federal Retirement: OPM Actions Needed to Improve Application Processing Times*. May 2019. <https://www.gao.gov/assets/700/699120.pdf>

¹² Office of Personnel Management. 2018. Full-Time Age Distribution. <https://www.opm.gov/policy-data-oversight/data-analysis-documentation/federal-employment-reports/reports-publications/full-time-permanent-age-distributions/>

¹³ Neal, Jeff. "Government Hiring of Young People continues to be horrible." Federal News Network. May 2019. <https://federalnewsnetwork.com/commentary/2019/05/government-hiring-of-young-people-continues-to-be-terrible/>