



KING COUNTY AUDITOR'S OFFICE

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Clearer Roles, Accountability, and Monitoring Would Support Equity Change

LUC POON
ANU SIDHU
KYMBER WALTMUNSON

Executive Summary

King County's goal to embed equity in every aspect of its operations is a complicated effort requiring clear roles, strong management structures, and accountability. While the County's strategies to drive change have largely aligned with leading practices, we found that ambiguity in roles and responsibilities between agency staff and the Office of Equity, Racial and Social Justice (OERSJ) slowed progress. OERSJ is further hampered by lack of rigorous management structures. Without greater clarity and accountability, King County risks losing momentum to build on positive progress.



King County

Acknowledgment

Between 2020 and 2022, the country saw an evolution in equity and social justice (ESJ) work. King County responded to this change with some positive progress. The disparate health impacts of COVID-19 on Black, Indigenous, and People of Color communities and the murder of George Floyd further emphasized the harms of systemic racism and increased expectations for transparent, accountable action from local governments. The County Executive responded by declaring racism a public health crisis to underscore the urgency of ESJ work and appointed the County's first Chief Equity and Inclusion Officer. At the time of our audit, the County Executive had proposed code language to better define the role of the Office of Equity, Racial and Social Justice (OERSJ) in implementing the County's ESJ goals.¹ OERSJ and the Office of Performance, Strategy and Budget are also helping to update the County's ESJ Strategic Plan to better clarify roles and responsibilities for the various county entities involved.

We would like to acknowledge the commitment of the OERSJ staff to driving positive change and the demanding work they performed during the COVID-19 pandemic. Our audit data-gathering and interviews occurred over a period which included spikes in local transmission of COVID-19. OERSJ staff were redirected to help address this crisis. Even with these pressing challenges, OERSJ staff and leadership were available to answer our questions and provide information. OERSJ has been in a period of redevelopment and reorganization since a change in leadership in mid-2020. The new leadership also coincided with the COVID-19 pandemic. Against this backdrop, OERSJ helped to develop new structures and processes while keeping existing operations running. We would like to acknowledge the work of OERSJ staff in keeping the work of ESJ going amid these changes and supporting the County in achieving its goals.

Our audit work identified significant positive progress by staff across King County to advance ESJ. As ESJ work evolves, King County is making efforts to ensure its work aligns with changing needs to advance equitable systems. We highlight the County's positive progress in green boxes in sections 2 and 3 of our report. We make recommendations even in cases where OERSJ and others have work planned because audit recommendations can provide additional impetus to help ensure the work is completed.

¹ In January 2023, King County changed the name of Office of Equity, Racial and Social Justice (OERSJ) to include "Racial". We use the current name in this report even when referring to past actions and conditions.

Clearer Roles, Accountability, and Monitoring Would Support Equity Change

REPORT HIGHLIGHTS

What We Found

Lack of defined accountability for King County strategies to improve equity slowed progress and threatens the sustainability of equity work. Ambiguity in roles and responsibilities between county agencies and the Office of Equity, Racial and Social Justice (OERSJ) has hindered progress toward achieving county equity goals, which ultimately aim to equitably improve social conditions for all King County residents. In addition, process gaps make it difficult to tell whether the County's actions are improving equity and racial justice as intended. OERSJ has undergone major changes in staffing, scope, and authority since 2020, and its governance structures are underdeveloped, hindering effective management.

King County's efforts to become anti-racist and pro-equity largely align with current leading practices for equity change. One notable gap is the lack of a strong data system to facilitate equity-based decisions and engagement with communities. Developing strong equity data systems and incorporating additional leading practices can help the County implement equity strategies and meet its equity goals more effectively and quickly.

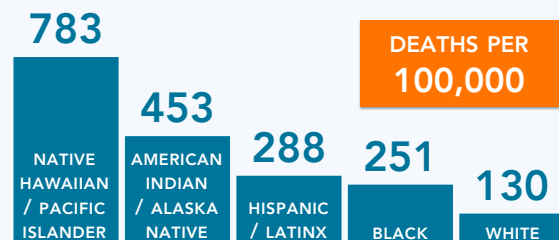
What We Recommend

We recommend that King County clearly define roles and responsibilities for implementing and tracking progress on its equity, racial, and social justice goals. Clarifying operational responsibilities in the strategic plan will enable OERSJ to better define and prioritize work across its various programs. OERSJ should strengthen its governance structures at the office and program level to improve management and accountability. To ensure King County continues to evolve in its equity work, we recommend the County take steps to better align with leading practices for equity change.

Why This Audit Is Important

Systemic racial disparities in King County are well-documented. For example, the median incomes of Asian- and White-headed households were double the income of Black-headed households. Black and Hispanic/Latinx residents in King County experienced food insecurity at substantially higher rates than the county average, and COVID-19 death rates in King County for Native Hawaiian and Pacific Islanders were six times as high as for Whites. In 2020, the County strengthened its commitment to centering equity in all county plans, actions, processes, and decisions. However, this goal is not easy to achieve. Effective equity integration requires changes by staff at all levels of government and effective data to guide decision-making. As the key agency leading this change effort, OERSJ must have strong and effective internal processes and organizational structures to make best use of its limited resources to help drive the County toward becoming pro-equity and anti-racist.

Communities of color had higher rates of COVID-19 deaths in King County.



Source: Public Health Seattle & King County

Clearer Roles, Accountability, and Monitoring Would Support Equity Change

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Lack of Clarity in Roles and Limited Accountability Hinder Progress

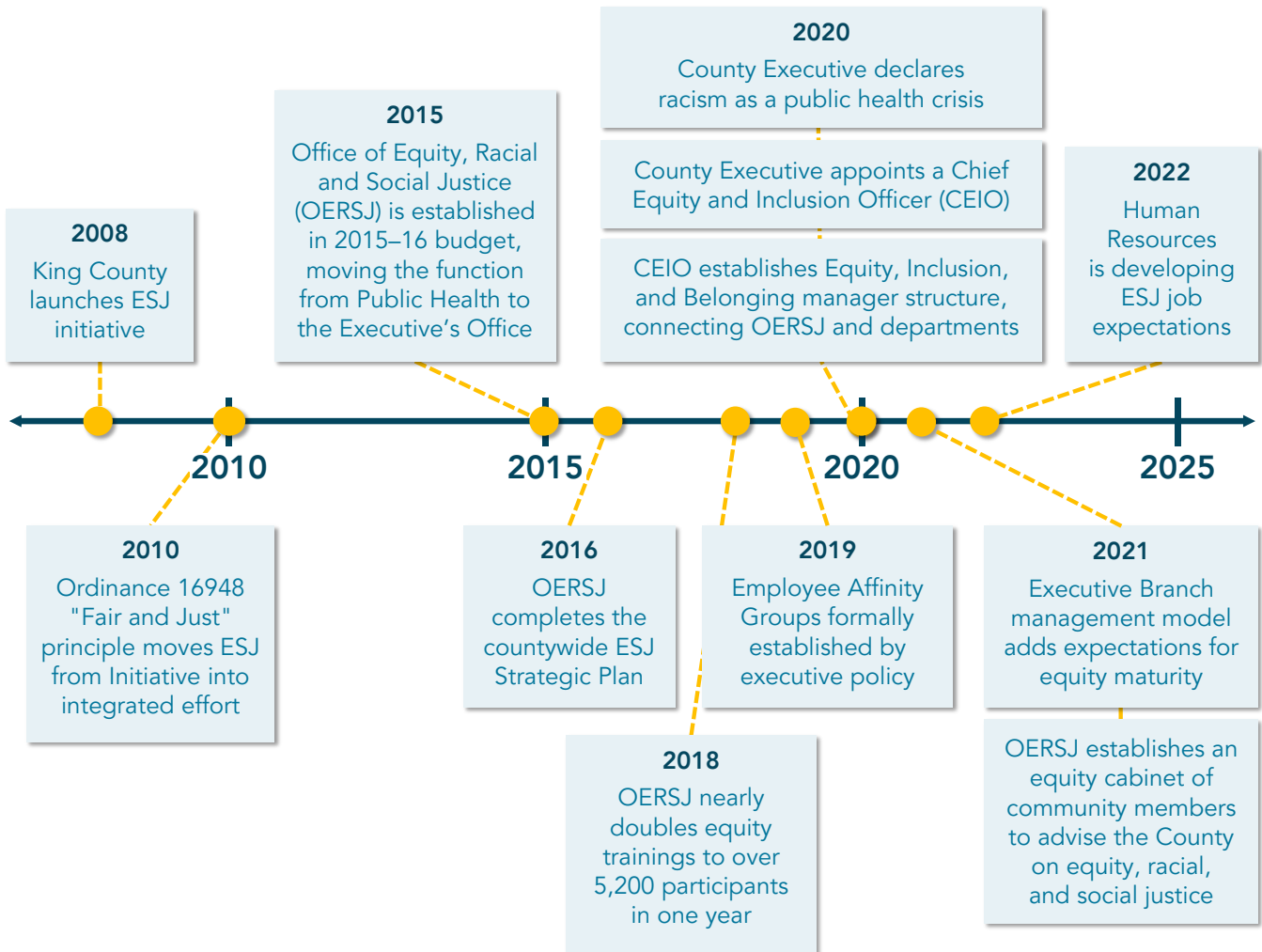
SECTION SUMMARY

While King County has directed agencies to incorporate equity in all programs and policies, the lack of clear roles and responsibilities and limited accountability for equity goals hinder progress and sustainability. The King County Council established the Office of Equity, Racial and Social Justice (OERSJ) to help drive efforts to increase equity in county policies, structures, and processes, but OERSJ's scope of work was not clearly defined until November 2022. Without clear directives and authority, OERSJ cannot effectively prioritize requests for assistance to match its capacity and lead the County's equity and social justice (ESJ) efforts. The County's Equity and Social Justice Strategic Plan (ESJ Strategic Plan) outlines internal goals to improve equity in county programs, but the County lacks a system to consistently track progress toward achieving its goals.

What has King County already done to advance equity?

King County has made coordinated efforts to advance ESJ for nearly 15 years. In February 2008, then-County Executive Ron Sims launched the Equity and Social Justice Initiative (ESJ Initiative). (See exhibit A.) The King County Executive designed the initiative to intentionally incorporate equity into agencies' policies, practices, and engagement with communities. In 2010, the County Council and County Executive Dow Constantine defined the responsibility of all county agencies to work toward equitable opportunities for all people and communities in King County Code. In 2015, the County Council established OERSJ through the budget process. Despite its initial allocation of 2.5 full-time equivalent employees (FTEs), OERSJ engaged in a wide set of responsibilities, including equity training, policy analysis, community engagement, employee engagement, and equity consulting for county agencies. In addition, one of OERSJ's major tasks was to develop a countywide ESJ strategic plan for the County to work toward a goal of "full and equal access to opportunities, power and resources so all people may achieve their full potential." OERSJ engaged over 700 employees and 100 community organizations to develop the 2016–2022 ESJ Strategic Plan, which received national recognition. See appendix 1 for more detailed information about King County's history in ESJ work.

EXHIBIT A: King County has made many efforts to further equity and social justice (ESJ) since 2008. See appendix 1 for further detail.



Source: King County Auditor's Office

? What is the intent of King County's equity efforts?

King County's equity efforts aim to improve the social conditions for historically marginalized communities and therefore all county residents. Social conditions include large and complex topics like public health and housing. Equitable improvements to social conditions mean that all county residents, regardless of race, gender, or other marginalized identity, can thrive, and that these identities do not dictate social conditions.

OERSJ role not clearly defined in relation to agencies

OERSJ operational responsibilities are not clearly defined—especially in contrast to the responsibilities of county agencies—making it difficult for county entities to collaborate in efficiently and effectively creating equity change. To achieve large goals, such as King County’s equity goals, organizations must establish clear operational structures and responsibilities according to leading practices. While OERSJ has administered a variety of specific functions since its creation in 2015, until legislative action in late 2022, there had not been clear, documented articulation of OERSJ’s broad, ambiguous charge of supporting county agencies in their efforts to advance ESJ. According to OERSJ, its role is to provide leadership, guidance, and subject matter expertise, and agencies are generally understood to bear the bulk of the responsibility for embedding equity into agency work. In practice, however, the boundary between OERSJ’s responsibilities and agency responsibilities is not clear. For example, senior OERSJ staff indicated that requests for agency consulting have more than tripled since 2020. OERSJ notes that because its roles are not clear, it is difficult for the agency to know when it should assist and when it should return the work to the agencies. According to OERSJ, agencies ask for help on matters like hiring panels, document reviews, and assistance resolving culture issues, to large tasks like consulting on countywide long-range plans, such as land use and the downtown civic campus. In addition, the County Council has assigned OERSJ work through provisos and other legislation. OERSJ staff said that while partnering with agencies is central to the office’s work, they lack the capacity to accommodate the large and unpredictable workload generated by agencies’ heavy reliance on their assistance. This situation has made it difficult to prioritize other important bodies of work, such as strategic planning, both enterprise-wide and for its own office.

There have been some efforts to clarify agency expectations for implementing equity work, but this still does not sufficiently clarify OERSJ’s role. A 2021 update to King County’s Lean Maturity Model—a set of management expectations intended to improve the function of government—articulated how executive branch agencies should work to incorporate pro-equity and anti-racist principles to achieve operational goals. For example, management expectations include considering racially equitable impacts in day-to-day work, setting equity targets and performance measures, and establishing an organizational culture that supports diversity, equity, and belonging. Since 2018, the County Executive expects agencies to conduct annual self-assessments on their progress at the division level and to report this to the Office of Performance, Strategy and Budget (PSB). While the 2021 update clarified agency responsibilities, OERSJ’s responsibilities are still unclear.²

² PSB stated that the Lean Maturity Model focuses on behaviors to improve operational effectiveness, efficiency, equity, and accountability. It does not describe *all* the behaviors and activities an agency should be doing to be pro-equity and anti-racist.

OERSJ’s role not documented in county code until late 2022

One reason OERSJ’s responsibilities have not been clear is that until late 2022, King County policy-makers had neither agreed on nor documented OERSJ’s responsibilities, contributing to confusion and difficulty with prioritization. Until the County Council approved legislation in November 2022, county leaders had not documented a complete vision for OERSJ’s role.³ Without this agreement, OERSJ did not have a firm mandate defining the goals and boundaries of its work. Instead, OERSJ had a broader set of responsibilities than it had the capacity to effectively deliver.

The new legislation modified county code to codify OERSJ and describe its functions and responsibilities to include:

1. Defining the County's equity, racial, and social justice outcomes with communities most affected by inequities.
2. Developing the County's strategies, practices, systems, and processes to achieve equity, racial, and social justice outcomes.
3. Providing strategic consultation to county agencies and the communities they serve to achieve equity, racial, and social justice outcomes.
4. Assisting county agencies to fulfill their responsibility to achieve equity, racial, and social justice outcomes.

This language is a positive first step but on its own will not clarify the roles and responsibilities of OERSJ in relation to agencies. Still, formal recognition of OERSJ’s role can provide a basis to do so. In the next paragraphs, we identify ways that the County Executive can further clarify roles and responsibilities.

ESJ Strategic Plan did not clearly distinguish roles between OERSJ and agencies

King County’s 2016 ESJ Strategic Plan included many goals and strategies but did not clearly articulate roles and responsibilities for implementing them, thus reducing accountability. The ESJ Strategic Plan broadly defined OERSJ’s role as “the backbone and coordinator of key county efforts to advance equity in the organization and community,” but the plan did not specify how, and there is no other document that specifies OERSJ’s role. The division of responsibilities between OERSJ and agencies for plan implementation is made more ambiguous because the plan states “...although there is now [OERSJ], every county agency and employee is still ultimately responsible for advancing ESJ activities and deliverables.” County leaders and staff stated that the lack of clarity in roles, responsibilities, and accountability makes it difficult to effectively implement the County’s ESJ goals. ESJ Strategic Plan updates are underway and there are plans to clarify roles and responsibilities for the various county entities involved. OERSJ and PSB staff are currently updating the plan and indicated that the update will include roles for OERSJ, Equity, Inclusion, and Belonging managers (further discussed in section 3), the Continuous Improvement Team within PSB, and county departments and agencies.

³ King County Ordinance 19541

Recommendation 1

The County Executive should ensure the update to the Equity and Social Justice Strategic Plan clearly defines and documents roles and responsibilities for the Office of Equity, Racial and Social Justice and county agencies.

Despite efforts, limited accountability for ESJ goals

Gaps in accountability processes make it difficult to tell whether King County is achieving ESJ Strategic Plan goals and whether its overall equity strategies are effective. Accountability is important for identifying whether the County's equity efforts are working as intended, but King County did not create a comprehensive system to consistently monitor its ESJ Strategic Plan goals or objectives.⁴ This means that the County cannot completely or consistently demonstrate that its equity strategies have been implemented nor communicate whether they have achieved results. The ESJ Strategic Plan stated that by 2018 there would be a system to evaluate and report progress at both county and agency levels, but it did not indicate who would develop this system and communicate the results. In 2019, OERSJ helped some agencies develop workplans based on the strategic plan goals and made efforts to use a data system to monitor parts of the plan. This approach failed for two reasons, 1) the data system did not include a way to aggregate data, and 2) not all county agencies participated. In addition, OERSJ noted that it did not have clear authority to mandate agencies to report on outcomes, which made it difficult to compel agency participation. In feedback solicited as part of the ESJ Strategic Plan update process described above, county staff indicated that better accountability for goals is an opportunity for improvement in an updated ESJ Strategic Plan.

Staff leading the update indicated that they will develop a performance management system to hold agencies accountable along with the updated plan. The system will track and measure agency activities under the strategic plan, including outputs and outcomes associated with the plan's goals and objectives. As shown in exhibit B, performance measures track progress on actions under King County's control. We will discuss community indicators, or the way the County tracks the impact of its actions on communities, in section 3. Community indicators provide information about social conditions that the County does not directly control but hopes to influence with its actions.

⁴ King County and its departments have various mechanisms for management and accountability, some of which incorporate elements of the ESJ Strategic Plan. These include the countywide employee engagement survey and Department of Human Resources dashboards that review benchmarks and goals for hiring, retention, and promotions.

EXHIBIT B: The Equity and Social Justice Strategic Plan update effort will increase accountability by developing a system to measure performance. We discuss community indicators in section 3 and exhibit G.



Source: King County Auditor's Office

Recommendation 2

The County Executive should identify, document, and communicate a process owner with the authority to monitor and track progress on the Equity and Social Justice Strategic Plan goals.

Recommendation 3

The process owner identified in Recommendation 2 should work with agencies to monitor, measure, and report on the goals and objectives identified in the Equity and Social Justice Strategic Plan.

Recommendation 4

The County Executive should incorporate agency feedback on improving goal tracking into the next iteration of the Equity and Social Justice Strategic Plan to ensure agency staff can implement and track progress on goals.



Office of Equity, Racial and Social Justice Governance Structure

SECTION SUMMARY

Lack of documented governance structures within OERSJ—the tools needed to support effective management—hinder agency administration and accountability. OERSJ indicates that it has not prioritized creating internal governance structures at the office or program level, in part because of lack of clarity around its roles and responsibilities, as described in section 1. In addition, many of OERSJ’s programs are new or reformulated as of 2020, and the agency is still working on developing key components of governance. This has made it difficult for OERSJ to effectively prioritize and manage its work and to clearly communicate results.

? What are governance structures?

Governance structures are foundational parts of a system of management that allow leaders to plan and conduct work and achieve desired results. Under county code, all executive branch and separately elected agencies are responsible for developing governance structures such as a mission and vision, goals, objectives, strategies, and performance measures.⁵ Further, leaders need to make sure that the organizational staffing structure and employee competencies support agency goals and objectives. Governance structures are important for effective management and continuous improvement.

OERSJ has not yet fully developed internal governance structures

OERSJ’s office-level governance structures have been underdeveloped, making it difficult to prioritize and manage work and communicate results. OERSJ can build upon recent progress. We found that OERSJ is in the process of developing governance structures, both at the office level and within its various programs. Few components were fully in place at the time of this review. The following paragraphs describe progress at each level. Exhibit C details OERSJ’s progress on each element of governance.

⁵ King County Code 2.10.034

EXHIBIT C: The Office of Equity, Racial and Social Justice has made recent progress in developing key governance structures; however, most are not yet completed.

GOVERNANCE STRUCTURE	PROGRESS
<p>Mission, vision goals, objectives, strategies: Management-leading practices direct agencies to have a mission, vision, goals, objectives, and strategies to meet objectives.</p>	<p>OERSJ documented its first mission statement in late 2022. It has not defined office-level vision, goals, objectives, or strategies as distinct from enterprise-level governance.</p>
<p>Organizational structures aligned with goals: Agencies should align their programs and work units with goals in mind and support this organizational structure with clear reporting lines.</p>	<p>OERSJ has revised its organizational chart several times in the last two years as leaders assess needs and respond to changing conditions. It did not have a final version at the time of this report. See appendix 3 for more detail. The office does have clear reporting lines between existing program staff, leads, and management.</p>
<p>Employee competence: Agencies should institute systems for employee competence such as onboarding and training processes, and performance measures and evaluations.</p>	<p>OERSJ has an onboarding process and conducted informal employee performance reviews in 2021. Senior staff indicated that OERSJ participated in the 2022 performance appraisal process.</p>
<p>Measures: Output and outcome measures should align with office-level goals and objectives.</p>	<p>OERSJ does not have output or outcome measures. Staff stated that OERSJ has made ad hoc attempts to track the assistance it provided to county agencies, community partners, and others. They said OERSJ prioritized providing assistance to county agencies and community partners in lieu of tracking efforts.</p>

Source: King County Auditor’s Office

Lack of governance structures contributed to staff overload

The lack of clear goals, objectives, strategies, and measures led to challenges, both within OERSJ and externally. Operating without documented governance structures has made it difficult for OERSJ to measure and communicate its results. OERSJ has not been able to clearly show policy-makers what it has achieved or plainly convey the role it played in enterprise-level successes. In fact, little information is publicly available that describes OERSJ’s achievements as an office. There have also been internal impacts of missing governance structures. For example, senior OERSJ staff said that it is difficult to prioritize their time when their expertise is needed in so many areas that have a critical impact on equity, racial, and social justice outcomes. Several former OERSJ staff cited excessive workload and lack of prioritization as factors in their decisions to leave the agency.

OERSJ cites several reasons that strong governance structures are not yet in place. Positive developments in 2020—including added emphasis on equity as an executive priority, a new director with added authority, and growth in staffing—required OERSJ to modify and strengthen the structures that existed previously. In addition, OERSJ indicated that leaders have been working on other urgent tasks. Specifically, they have been defining new roles for the office at the enterprise level and determining how best to use limited resources to further equity in King County.⁶



POSITIVE PROGRESS

In 2022, OERSJ published a mission statement that provides a strategic foundation for office-level goals, objectives, strategies, and measures. OERSJ can align programs with the new mission and define boundaries on the scope of its work.

Recommendation 5

The Office of Equity, Racial and Social Justice should document and implement key office-level governance structures, including:

- **vision, goals, objectives, and strategies**
- **organizational structures**
- **systems for employee competence**
- **methods to measure outputs and outcomes.**

⁶ Priorities for OERSJ leaders included strategizing the County Executive’s anti-racism priority and associated investments, building the Equity, Inclusion, and Belonging manager structure that connects OERSJ with agencies, and OERSJ’s Community Engagement and Co-Creation program.








Most OERSJ programs have not documented governance structures

OERSJ manages its six existing programs without documented program-level governance structures, limiting tools for management and accountability. In addition to its strategic planning and leadership roles, OERSJ has a variety of programs, including Language Equity, ESJ Policy Advisement, and Community Engagement and Co-Creation. Some programs have only one staff person; others have a lead and up to three employees. As the number of staff grows and the work increases in complexity, OERSJ will need documented governance structures. Leading practices for effective organizational management and King County's management expectations require documenting goals, objectives, strategies, and output and outcome measures for programs.⁷ These governance structures enable OERSJ programs to manage resources to effectively achieve intended outcomes and allow them to demonstrate progress and achievements. Further, leading practices advise managers to design policies, procedures, and other guidance that define staff responsibilities and authority, as well as the processes they should follow.

We surveyed employees leading OERSJ programs and found that most governance structures are not in place, but many are in development. OERSJ leaders stated that they want to empower program staff to develop work plans in collaboration with county agencies where appropriate. They stated that it takes time to refresh and strengthen programs as OERSJ reorganizes and reformulates itself. Four of the six staffed programs are new or significantly changed since 2020. That year, in response to the COVID-19 pandemic and the County Executive's declaration of racism as a public health crisis, the County Executive added new positions and teams to support King County's efforts to become an anti-racist and pro-equity government. As a result, many of OERSJ's program lead staff are relatively new: the average tenure at the time of this report was 1.5 years. See appendix 3 for more detail. As shown in exhibit D, below, we found that only one of the six programs had documented goals, objectives, and strategies. None of the programs measured outputs (actions, products, and processes) or outcomes (intended changes as defined in goals and objectives). One program had documented policies and procedures. However, many program leads stated that they were in the process of developing and/or documenting these components.

⁷ King County directs agencies and programs to develop these governance structures in line with its Best Run Government model.

EXHIBIT D: Many of Office of Equity, Racial and Social Justice’s (OERSJ) program leads indicated that they are working on developing key governance components for their programs.

OERSJ PROGRAM	GOALS	OBJECTIVES	STRATEGIES	MEASURE OUTPUTS	MEASURE OUTCOMES	POLICIES & PROCEDURES DOCUMENT
Anti-Hate and Bias 					PLANNING STAGE	
Civil Rights, ADA, Disability Equity 						
Community Engagement and Co-Creation 	DEVELOPING / DOCUMENTING					
ESJ Policy Advisement 						NOT PLANNED*
Internal Investments and Capacity Building 						
Language Equity and Immigrant and Refugee Programs 	DEVELOPED / DOCUMENTED					
Data Management 	New program—not yet staffed					

*OERSJ staff do not have plans to develop the governance component within the next six months.

Source: King County Auditor’s Office August 2022 survey of OERSJ program lead staff and manager input

Recommendation 6

The Office of Equity, Racial and Social Justice should develop key governance structures at the program level including documenting goals, objectives, and strategies; methods to measure outputs and outcomes; and policies and procedures.

More Opportunities to Advance Equity Change

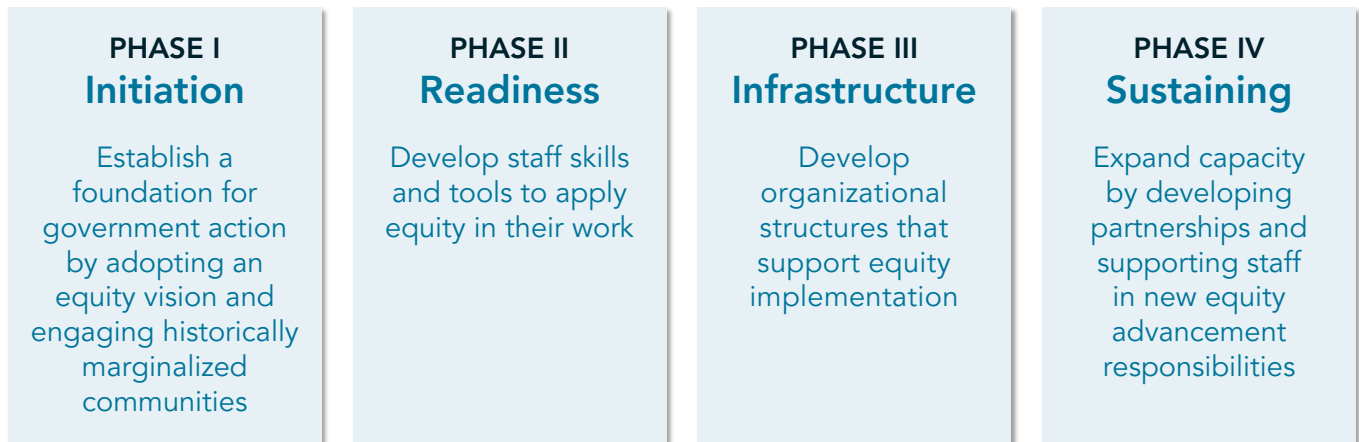
SECTION SUMMARY

King County’s efforts to become anti-racist and pro-equity are largely aligned with leading practices for equity change but some gaps remain that hinder progress. While the County has demonstrated commitment to integrating equity across the government, county efforts are underdeveloped in some areas. The biggest gap is related to data; King County has limited equity-informed data available to help agencies and their staff make more effective equity-based decisions. If the County fully implements leading practices, equity change could be more effective and sustainable.

Leading practices outline a process to center equity in local governments

New leading practices for equity implementation offer a framework for organizational change management. The International City/County Management Association (ICMA) December 2020 paper, “Governing for Equity: Implementing an Equity Lens in Local Governments,” summarizes the steps governments need to take to achieve equity change, drawing on principles from organizational change management (see exhibit E).⁸ Organizational change management is a term used to describe how organizations make significant changes in their operations or culture. ICMA identified and documented effective practices for equity change through a review of seven jurisdictions around the country.⁹ In this section, we will use these practices as a framework to identify opportunities for King County to strengthen equity efforts.

EXHIBIT E: The International City/County Management Association organizes equity change around four phases: Initiation, Readiness, Infrastructure, and Sustaining.



Source: King County Auditor’s Office using International City/County Management Association framework

⁸ www.icma.org/page/governing-equity-implementing-equity-lens-local-government

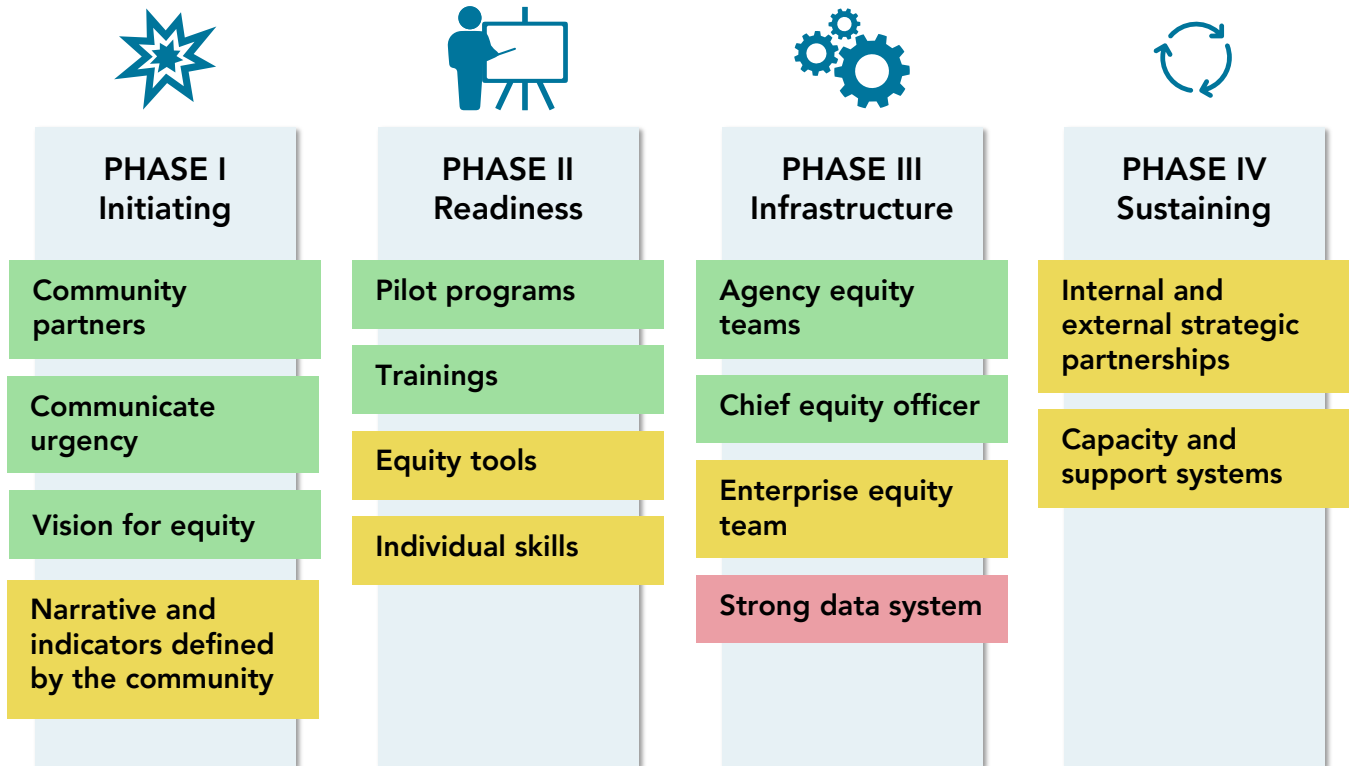
⁹ The seven jurisdictions included Alexandria, VA; Austin, TX; Boulder, CO; Dallas, TX; Fort Collins, CO; Grand Rapids, MI; and San Antonio, TX.

King County is largely in line with best practice, but some gaps remain

King County’s equity change efforts are largely aligned with the ICMA change management guidance, but some gaps remain that hinder progress. We identified gaps that, if addressed, will help improve the County’s implementation of equity change. We conducted our assessment using a series of interviews, document reviews, and a survey of agency ESJ representatives. Please see page 39 for more detail on our methodology.

The following paragraphs will describe the gaps across each of the four phases in equity change management. Exhibit F shows the County’s strong performance in green and opportunities to strengthen practices in yellow and red. We discuss yellow and red items in the narrative below. Appendix 2 includes more information on the green items.

EXHIBIT F: King County has met several best practices needed for equity change but some gaps remain.



Source: King County Auditor’s Office using International City/County Management Association framework



PHASE I: INITIATING



Community partners: OERSJ engages community partners and has a community engagement program.



Communicate urgency: The County declared racism as a public health crisis.



Vision for equity: The County developed the “Fair and Just” ordinance indicating it will integrate equity in all lines of business.



Narrative and indicators defined by the community (described below).

Community input not gathered for initial set of indicators

Narrative and indicators defined by the community: King County did not use community input to develop its 2015 community indicators, but plans to do so in the next update. This is a best practice that helps empower the communities most impacted by the County’s equity work. Organizations should engage communities to develop community indicators to best understand their needs and priorities. Engaging the public is important because the goal of equity is to improve the lives of people in communities; without doing so, the government risks imposing incorrect assumptions about what outcomes are important to them. While the County engaged communities for part of its development of the strategies in its 2016–2022 ESJ Strategic Plan, it did not do so in developing the initial community indicators meant to assess the impact of the ESJ Strategic Plan. A 2021 County Council ordinance asked PSB to update the County’s community indicators. PSB said it was not able to incorporate community input in 2015 because it did not have the time and resources, but it is doing so for the 2023 update. PSB collected results from other county community engagement efforts to use in the update, and it plans to publish them in 2023.



POSITIVE PROGRESS

PSB plans to incorporate community input as part of its plan to update King County’s community indicators.

Recommendation 7

The Office of Performance, Strategy and Budget should finalize and publish its updates to the County’s community indicators based on community input as planned.



PHASE II: READINESS



Pilot programs: Most agencies we surveyed indicated they are employing equity pilot programs.



Trainings: The Department of Human Resources offers equity-related trainings to staff.



Equity tools (described below).



Individual skills (described below).

Agencies say the County’s main equity tool is confusing

Equity tools: King County’s main equity tool is outdated and confusing, making it less effective than it could be. The County’s main equity tool is called the Equity Impact Review (EIR). OERSJ developed this tool to help county staff identify, evaluate, and communicate the potential impact of a policy or program on equity.¹⁰ Tools such as the EIR are a leading practice to help agencies structure their thinking so they can make equity-informed program and policy decisions. County agency representatives we surveyed said that the EIR is confusing and cumbersome and, as a result, some agencies said they do not use it.¹¹ OERSJ leaders stated they plan to update the EIR, but have not published an update since its creation more than a decade ago. Equity-leading practices have evolved in that time, making the tool less reflective of current concepts. This may contribute to gaps in EIR use.

There is currently no agency training on the EIR, which could contribute to why agencies find the EIR confusing. OERSJ staff indicated they provided training on the EIR for a few years but stopped in 2019 due to the COVID-19 pandemic and shifting priorities. Leading practice shows that training staff is essential to ensure effective implementation of equity tools, but this is not yet in place in King County. Without training, staff may not know how to implement the EIR, reducing the likelihood it is used. OERSJ indicated it would like to collaborate with the Department of Human Resources (DHR) to develop a training on the EIR.



POSITIVE PROGRESS

OERSJ indicated that it wants to update the equity impact and review tool and develop a training to help agencies implement it.

¹⁰ Equity tools often require that staff answer the following questions regarding their programs and policies: What is the desired outcome? Who will benefit? What communities have been engaged in the development of the policy or program? What strategies are in place for advancing a racially equitable implementation?

¹¹ See page 39 for details on methodology and who we surveyed.

Recommendation 8

The Office of Equity, Racial and Social Justice should update the Equity Impact Review tool to improve the tool’s usefulness.

Recommendation 9

The Office of Equity, Racial and Social Justice should work with the Department of Human Resources to develop and implement a training for agencies on the updated Equity Impact Review process.

Agency staff may lack equity skills

Individual skills: Agency ESJ representatives indicated that lack of staff skills in their agencies is a barrier to implementing equity initiatives. Agencies should help staff develop the skills they need to apply equity principles in their work. Agency ESJ representatives we surveyed indicated that the lack of staff skills to apply equity has hindered their agency’s ability to contribute to King County’s equity goals most effectively. While there may be varying reasons why individuals lack skills to implement equity work, two elements likely contribute to the gap: 1) lack of clear expectations for management and staff in documents such as job descriptions, and 2) weak systems of accountability in documents such as performance evaluations.

King County’s ESJ Strategic Plan notes that by 2018 all supervisors, managers, and directors will have equity measures in their performance reviews. Despite this, fewer than a third of agency representatives we surveyed said that their agency evaluates all staff on equity performance competencies. One reason agencies may not evaluate staff on equity performance is because equity is not always included in core competencies for county job expectations. In coordination with OERSJ, DHR is developing a “Racially Just Competency” document that will set up clear expectations for equity work in job descriptions, interview questions, onboarding, and training. DHR states that a long-term goal is to include these competencies in staff performance evaluations, but the priority is to first ensure expectations are clear in job expectations and onboarding before evaluating staff on expectations for equity competencies. DHR indicated that the purpose of this work is to clearly outline what skilled equity work looks like to set up clear expectations for staff. This is an important first step to hold staff accountable to developing and implementing equity principles in their work.



POSITIVE PROGRESS

The Department of Human Resources is working with OERSJ to establish clear ESJ expectations in job descriptions, interview questions, and job onboarding and training.

Recommendation 10

The Department of Human Resources should implement the Racially Just Competency as planned.



PHASE III: INFRASTRUCTURE



Agency equity teams: Many county agencies have equity representatives that have documented equity plans for their agency.



Chief equity officer: Anita Whitfield is King County's current chief equity officer.



Enterprise equity team (described below).



Strong data systems (described below).

Enterprise equity team could help

Enterprise equity team: King County does not have an equity team that includes all branches of government, slowing enterprise-wide change. According to ICMA, government organizations should have core equity teams comprised of representatives across all departments. The objective of core equity teams is to share knowledge across the organization. The County's Equity, Inclusion, and Belonging (EIB) managers bridge OERSJ and agencies, sharing strategies and helping implement equity work in agencies. The County's EIB structure accomplishes much of ICMA's knowledge, sharing purpose across departmental equity leaders, but the EIB structure only applies to the executive branch and not the legislative and judicial branches of government.¹² The legislative branch has its own ESJ director, and the judicial branch may also have its own equity leads, however there has been limited coordination across these branches of government to share knowledge on their equity work.¹³

King County had an enterprise-wide equity group called the Interbranch Team (IBT), but it has been inactive since 2020 due to the additional work demands of the COVID-19 pandemic. IBT was a way for department representatives across the branches of King County to discuss equity strategies and lessons learned. Without an enterprise-wide coordination body, agency improvements can be siloed and opportunities to leverage lessons learned are diminished.

¹² In another audit report, we make recommendations to criminal legal agencies, including the judicial branch, to better coordinate on criminal legal goals, such as the County's goal to reduce racial disparities in the criminal legal system. Please see our audit report "Incarceration Alternative and Diversion Programs: Improved Strategy, Data, and Coordination Could Help County Meet Goals", December 13, 2022, <https://kingcounty.gov/depts/auditor/auditor-reports/all-landing-pgs/2022/incarceration-alternatives-2022.aspx>.

¹³ We do not have information on equity leads in the judicial branch because Superior Court declined to provide this information and District Court did not respond.

Recommendation 11

The County Executive should identify and implement the best approach to facilitate sharing of equity information related to leading practices, insights from data, and lessons learned across King County.

Equity-informed data systems needed for equity change

Strong data systems: Strong equity-informed data systems are required to support effective equity change. Equity-informed data systems help organizations and their staff effectively consider equity when they make decisions. Leading practices also note that strong equity-informed data systems offer a way for the community to engage in conversation around outcomes in their communities. To be equity-informed, a data system should:

1. Track the use of equity tools across the organization.
2. Track community indicators.
3. Share community indicators with the public.
4. Facilitate sharing of equity data.

The following paragraphs will assess how well King County implements each of these four elements.

Equity tool usage is not tracked

Neither OERSJ nor county agencies formally track whether agencies use King County's EIR tool, making it difficult to know where there are gaps in implementation. As described above, the County's equity tool, the EIR, helps agency staff integrate equity principles in decision-making. OERSJ cannot consistently know whether or which agencies are implementing EIR because the office does not track its use, but some agency ESJ representatives we surveyed said that they do not use EIR. Tracking could help OERSJ and others identify gaps in the ways agencies use or do not use EIR. This, in turn, could help OERSJ refine the EIR or educate county staff about its use to achieve its goal of integrating equity in all lines of work.

Recommendation 12

The Office of Equity, Racial and Social Justice, in collaboration with agencies, should aggregate and maintain agency data on usage of the Equity Impact Review tool.

No plans to regularly update community indicators

King County does not have a plan to assess changes in its community indicators, hindering the County's ability to decide how and where to adjust its strategies to achieve intended population-level impact. Leading practices state that it is important to identify indicators in the community to help determine whether social conditions are improving over time. These indicators evaluate the larger impact of government programs and actions on residents, particularly those who are disadvantaged by systemic biases related to race, class, gender identity, ability, or

intersecting characteristics. Community indicators also inform government plans and strategies to improve social conditions. According to the Government Alliance on Race & Equity, these indicators may not be quick to move because they reflect generations of policy and systems failures that have produced racial inequity. They are powerful measures that focus and hold government efforts accountable to population-level systems change over time (see exhibit G, originally introduced on page 11 as exhibit B).



POSITIVE PROGRESS

PSB is reassessing and updating the community indicators for the first time since 2015.

In 2015, King County identified 67 community indicators that it intended to use to inform and assess the County’s equity strategies over time.¹⁴ While the County does not have full control over how indicators change, the County’s equity strategies aim to improve community indicators over time. The County provided baseline data for community indicators in 2015 with the intention of revisiting them. After the current effort to update community indicators, there is no regular plan to conduct future updates. The County indicated that assessing changes in community indicators would “help guide the allocation of limited resources, inform the degree to which ESJ efforts are having the intended effect, and support course correction so efforts can achieve positive change.” The County did not assess changes in these indicators, however, limiting opportunities to know whether county equity strategies, as a whole, are contributing to improvements in community conditions as intended. Since another purpose of community indicators is to inform the County’s equity strategies, aligning reporting with updates to King County’s ESJ Strategic Plan can help ensure the County is assessing its priorities and strategies in line with changing community conditions.

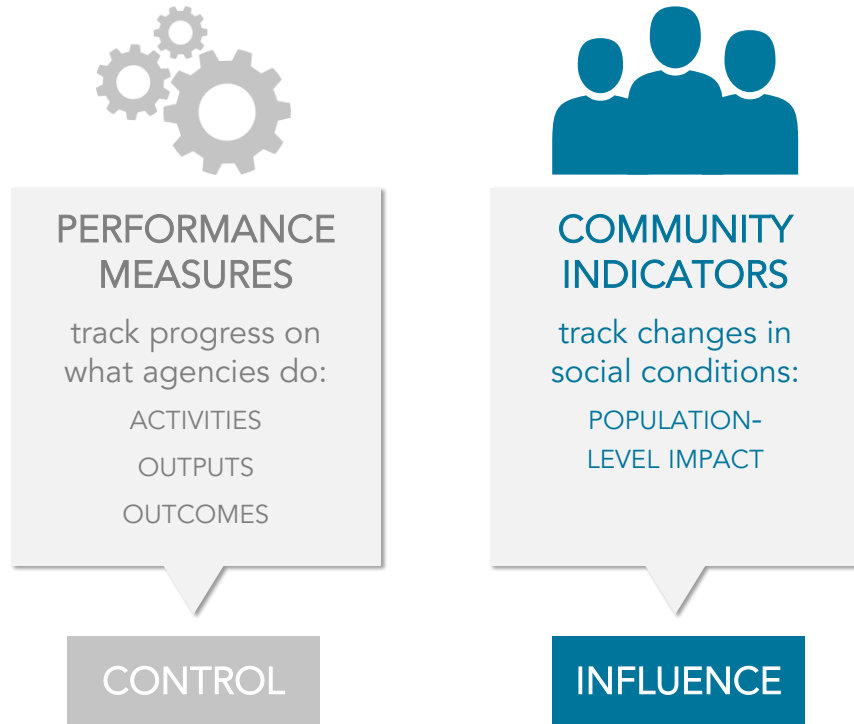
In 2022, PSB both reassessed and is updating the community indicators for the first time since 2015. Staff indicated that the project should be complete in early 2023.

Recommendation 13

The Office of Performance, Strategy and Budget should update community equity indicators in time to inform updates to the Equity and Social Justice Strategic Plan.

¹⁴ King County’s equity strategies aim to focus on fourteen community conditions that the County terms the Determinants of Equity (Determinants). Determinants include things like quality education and economic development. The County’s community indicators provide a way to measure these determinants.

EXHIBIT G: King County’s community indicators inform its equity strategies and track changes in community conditions over time. The County’s equity strategies aim to positively influence these indicators in the long-term. Performance measures are discussed in section 1 and exhibit B.



Source: King County Auditor’s Office

No public reporting on community indicators

There is no consistent public reporting on King County’s community indicators, limiting transparency. Leading practices state that an external data dashboard is important because it helps shape community discourse around equity. Transparent and consistent reporting can help the County show residents that it is actively engaged in equity strategies to improve community conditions and can help track population-level impact. King County does not have an external data platform to share data on its community indicators. External data dashboards should be updated with some regularity to track changes in community conditions. OERSJ and PSB recognize the lack of external dashboards as an issue and are taking steps to address it. Staff leading the ESJ Strategic Plan update indicated that the next ESJ Strategic Plan may include a provision to publicly report on community indicators and ensure updates are happening more consistently.

 **POSITIVE PROGRESS**

PSB indicated it is in the process of identifying an appropriate platform for a public dashboard to display community indicators.

Recommendation 14

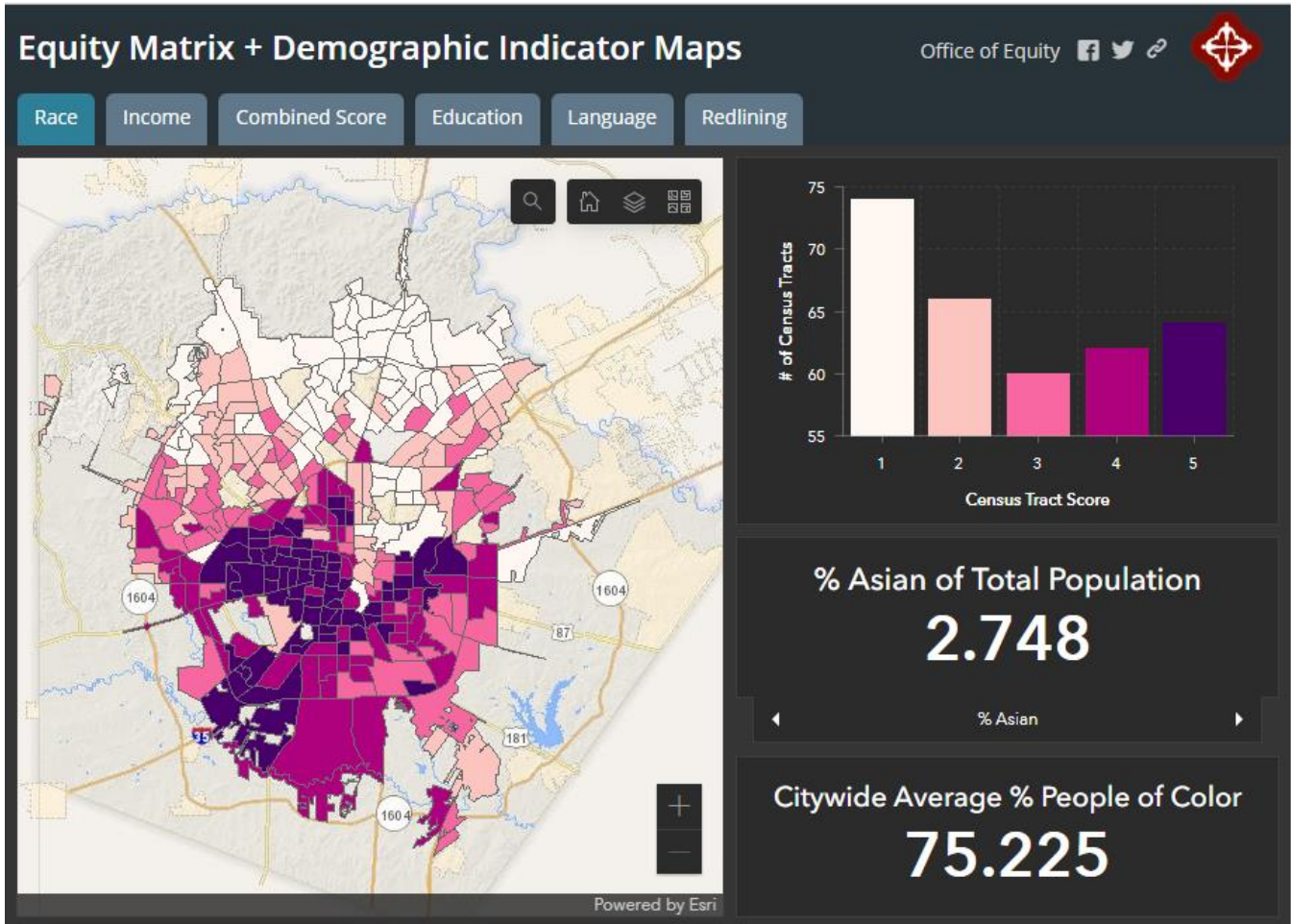
The Office of Performance, Strategy and Budget should develop a platform and use it to report on changes in King County’s community indicators.

Opportunities to include more equity data

King County could pull more information into its existing map of equity data to help agencies understand which communities may be disproportionately affected by its programs or policies.¹⁵ Equity data is information that agencies can use to disaggregate groups of people by race or other characteristics, including demographic data, geographic data, income data, and others. Leading practices indicate that having a central map of equity data is important to help agencies identify how their programs or policies may impact specific communities. The City of San Antonio, Texas, provides city demographic information in a public, online dashboard to help inform San Antonio’s programs and policies (see exhibit H). Although King County has a central map with merged data on language, income, and race—disaggregated by geography for agencies to use—it does not include other important equity data. For example, King County Information Technology (KCIT) reports on outcomes related to internet access disaggregated by income. This information has helped the department inform strategies to increase digital equity (i.e., ensuring everyone is able to access information available on the internet). This information exists within KCIT, but it could be useful to other county agencies in making service decisions that might be affected by internet access. OERSJ indicated it would like to pull together more data into a central data map to help agencies make equity-informed decisions.

¹⁵ King County’s map of equity data:
<https://experience.arcgis.com/experience/2e2dc414086648128bbf96f552817e7e/page/Page-1/>

EXHIBIT H: The City of San Antonio, Texas, has an equity map of demographic indicators across different community characteristics to inform equity approaches on programs and policies.



Source: City of San Antonio, Texas, Office of Equity, <https://cosagis.maps.arcgis.com/apps/MapSeries/index.html?appid=184271d3b89748e5b6ba183463da804a>

Recommendation 15

To help agencies make equity-informed decisions, the Office of Equity, Racial and Social Justice, in collaboration with other King County agencies, should conduct a needs assessment for equity data.

Recommendation 16

The Office of Equity, Racial and Social Justice, in collaboration with other King County agencies, should expand its central map of equity data to include information collected in Recommendation 15.



PHASE IV: SUSTAINING



Internal and external strategic partnerships (described below).



Capacity and support systems (described below).

Internal and external strategic partnerships: While King County has external community partnerships, it could do more to partner internally across all branches of government, as described in the discussion of Phase III, above. The County engaged over 100 community organizations in developing its 2016–2022 ESJ Strategic Plan. OERSJ also has a program dedicated to community engagement. The County has efforts to partner internally through the EIB structure, as described in Phase III, but not all branches of government are involved, slowing enterprise-wide change. ICMA indicates that successful equity change includes having internal partnerships across all parts of government. Recommendation 11, above, may help improve the County’s internal partnerships.

More work needed to ensure equity change is sustainable

Capacity and support systems: King County has some structures in place to help staff to integrate equity into their work but may need to do more to sustain progress. According to ICMA, organizations need to provide staff the support systems they need to do equity work well. Gaps in staff support can reduce sustainability of equity change because staff may not be given the time and resources needed to drive change in their organizations. Current and former OERSJ employees and EIB managers said equity work can take an emotional toll on staff, making support structures even more important. EIB staff indicated that it often needs to justify equity work because it does not necessarily have the full support of department leadership to implement equity principles. EIB staff also said the risk of limited support means that the County could lose key staff who are trying to implement equity principles. One way to help staff feel supported in equity work is ensuring supervisors and managers understand the importance of equity work and are held accountable. Recommendation 10, above, may help address some of these concerns.

Conclusion

As stated in the 2016-2022 King County ESJ Strategic Plan, systemic racial disparities are well-documented, persistent, and in some cases, worsening. The County has acknowledged the urgency of this problem by committing to becoming an anti-racist and pro-equity government. While the County has taken many steps that have helped the government better include equity thinking in programs and policies, several gaps hinder progress and could undermine the long-term sustainability of this work. If the County is to achieve its strategic goals related to equity, it will need to provide clear authority to those charged with driving King County toward its goals, rather than leaving ambiguity in roles and responsibilities across agency staff and OERSJ. In addition, a clearer definition of OERSJ’s responsibilities will better enable the agency to

refine work scopes and governance for each of its programs to prioritize and complete its work more effectively. Last, there needs to be clear data and monitoring to ensure county strategies are achieving community outcomes to improve equity. Without this information, the County cannot demonstrate what strategies it is using or whether they are working, which could undermine community trust over time. As the County Executive stated in June 2020, racism is a crisis that needs immediate action. Our recommendations will help provide the building blocks needed to help the County move urgently and sustainably to promote equity and address the harms of racism in the King County community.

Appendix 1

King County Historical Milestones in Advancing Equity

Year	Action	Description
2008	Equity and Social Justice Initiative launches	In February 2008, then-County Executive Ron Sims launched the Equity and Social Justice Initiative (see exhibit A). The initiative was designed to intentionally incorporate an equity lens into department policies and practices, and their engagement with communities. Prior to the initiative, departments and agencies focused on disparities and disproportionality in areas such as health and criminal justice, but their efforts were not aligned under common goals.
2010	Ordinance 16948 “Fair and Just” principle moves equity and social justice from an initiative to an integrated effort	The King County Council and County Executive Dow Constantine codified the responsibility of all county agencies to apply the “Fair and Just” principle as a core element of the countywide strategic plan. This directs all agencies in the County to support equitable opportunities for all people and communities. The passage of the October 2010 “Fair and Just” ordinance marked a level of leadership focus on equity and social justice (ESJ) that continues through the present day.
2015	The Office of Equity, Racial and Social Justice is established in a 2015–16 County Council budget action	The County Council established the Office of Equity, Racial* and Social Justice (OERSJ) in January 2015, moving the function of ESJ work from Public Health – Seattle & King County to the County Executive’s Office, thus expanding ESJ to apply to all agencies. OERSJ’s role was to serve as the coordinator of key efforts to advance equity in the organization and community. At the time of its creation, the office had two full-time staff and one intern. *“Racial” was added to the name in 2023.
2016	The Office of Equity, Racial and Social Justice completes the countywide Equity and Social Justice Strategic Plan	OERSJ staff worked with over 600 employees and 100 local organizations to develop the first Equity and Social Justice Strategic Plan (ESJ Strategic Plan) to help guide King County in meeting its equity goals. The County’s 2016–2022 ESJ Strategic Plan achieved national recognition as a model for advancing equity in government. It lays out a vision and strategies for the County to work toward a goal of “full and equal access to opportunities, power and resources so all people may achieve their full potential.” The plan directs county agencies and staff to focus on people and places where needs are greatest to ensure that decisions, policies, and practices are equitable.
2018	The Office of Equity, Racial and Social Justice adds	Between 2016 and 2019, OERSJ increased in size and scope, absorbing new functions and adding staff. A 2018 ordinance added work related to immigrant and refugee programs and language access coordination for

Year	Action	Description
	staff and takes on new responsibilities, including equity training	<p>the County. Another ordinance the same year added the civil rights program to OERSJ, including enforcing nondiscrimination and disability laws and handling complaints under the Civil Rights Act. A new position was added to increase training capacity, as OERSJ became the primary entity to fulfill the County’s equity training needs. In 2018, trainings peaked at over 5,200 participants in a single year. By 2019, OERSJ had expanded from three to nine staff.</p> <p>OERSJ’s longtime director left the office at the end of 2019, and the County Executive appointed an interim leader until June 2020.</p>
2019	County Executive policy formally establishes Employee Affinity Groups	The County Executive signed the Employee Resource/Affinity Group Policy, which formalizes the work of affinity groups. These groups are employee-led and focus exclusively on state- and federal-protected categories (such as race, gender, and sexual orientation) and their common interests.
2020	<p>County Executive appoints a Chief Equity and Inclusion Officer</p> <p>Chief Equity and Inclusion Officer establishes Equity, Inclusion, and Belonging manager structure connecting OERSJ and departments</p>	<p>The County Executive appointed a Chief Equity and Inclusion Officer (CEIO) to direct OERSJ and lead the County’s efforts to become an anti-racist, pro-equity government. The CEIO sits on the County Executive’s Senior Leadership Team and was given the authority to direct equity strategies and processes across King County government.</p> <p>The CEIO implemented a new class of staff employed within executive departments but coordinated by OERSJ Equity, Inclusion, and Belonging (EIB) managers. The EIB manager role was intended to help bridge OERSJ and agencies and to facilitate sharing of equity strategies across agencies. In the past, some departments had equity managers, but their scope of work varied and there was no central direction or coordination. Now, the intent is for EIB managers to drive agency progress toward achieving goals by:</p> <ul style="list-style-type: none"> • helping agencies plan and strategize about how to advance equity in alignment with county goals. • providing best practices and technical support on equity-related projects. • providing coaching and support for managers and other employees to be culturally responsive, inclusive, and equitable. • building internal and external partnerships that help attract and amplify under-represented and diverse perspectives.
2020	County Executive declares racism as a public health crisis	Senior OERSJ staff stated that the disproportionate impacts of COVID-19 on Black, Indigenous, and People of Color communities and the racial reckoning sparked by the George Floyd murder, illuminated the impact of inequities in a new way and created additional urgency for King County to take action. The County Executive declared racism a public health crisis and made anti-racism a priority in the 2021–2022 budget.

Year	Action	Description
2021	Executive branch updates management model	A 2021 update to King County’s Lean Maturity Model added language clearly describing management expectations for executive branch agencies to develop pro-equity and anti-racist behaviors. While this is not intended to be an equity-specific maturity model, the 2021 update added explicit equity expectations such as disaggregating data by race, income, language, and place, and emphasizing the needs of customers and communities who have traditionally been underserved.
2021	OERSJ establishes Equity Cabinet for community input	Following the success of King County Metro Transit’s Mobility Equity Cabinet and Water and Land Services’ Open Space Equity Cabinet, OERSJ established an Equity Cabinet to inform enterprise-wide decisions. The Equity Cabinet consists of 15 members of Black, Indigenous, and People of Color communities who are compensated for their time. Members meet monthly and analyze King County’s practices and procedures to ensure that decision-making addresses the root causes of disparities and distributes resources using equity and racial justice as primary factors for defining objectives and measuring progress. They also support evaluation of the County’s progress on the ESJ Strategic Plan and pro-equity policy agenda, among other responsibilities.
2022	The Department of Human Resources develops racial justice competence for job expectations	The Department of Human Resources (DHR) is developing a “Racially Just Competency” for employees to set expectations for an equity-oriented mindset and actions in job performance. DHR plans to include elements of this competency in job descriptions and onboarding. DHR plans to train employees on the competency. Eventually, DHR intends for managers to use it in performance evaluations.

Source: King County Auditor’s Office’s analysis of county documents and information

Appendix 2

Change Management for Equity Implementation: Assessment of King County

We used the International City/County Management Association’s (ICMA) equity change management framework to conduct the following assessment of King County’s practices and progress to advance equity. As described in section 3 of our report, ICMA organizes equity change management across four phases: Initiation, Readiness, Infrastructure, and Sustaining. Each phase has several practices that governments implement in alignment with leading practices. We describe King County’s assessment against each of these phases and practices below.

Equity change management element	Assessment (yes, no, partial)	Reason for assessment
PHASE I: INITIATION		
Create and adopt equity-oriented vision	Yes	King County has created and communicated an equity-oriented vision since 2010. In 2022, the County Executive declared that the County would work to become an anti-racist and pro-equity government.
Engage community stakeholders on issue of equity	Yes	The Office of Equity, Racial and Social Justice (OERSJ) workload includes a community engagement program to engage community in county program and policy decisions. In addition, King County’s racism as a public health crisis announcement propelled many efforts to actively engage community on how to appropriately respond to the COVID-19 pandemic.
Communicate urgency of equity work	Yes	In June 2020, the County Executive declared racism as a public health crisis, underscoring the urgency of anti-racism and pro-equity work.
Equity-related trainings offered to staff	Yes	The Department of Human Resources (DHR) offers countywide equity trainings. In addition, 67 percent of agencies we surveyed said they offer their own trainings and an additional 14 percent adapt DHR trainings to target their agency’s specific needs.
Develop quantitative and qualitative narrative based on community engagement	Partial	While King County’s Equity and Social Justice Strategic Plan planning process partially engaged community to develop the plan’s vision and strategies, community was not engaged when the County developed its initial set of community indicators meant to assess the County’s community conditions; they plan to do so in their next update.

Equity change management element	Assessment (yes, no, partial)	Reason for assessment
PHASE II: READINESS		
Pilot programs for department readiness: departments piloting equity-based programming, plans, or tools	Yes	Based on the agency equity representatives we surveyed, 93 percent of agencies are employing pilot programs.

Equity change management element	Assessment (yes, no, partial)	Reason for assessment
PHASE III: INFRASTRUCTURE		
Departmental Equity Teams that operate internally within departments	Yes	Equity agency representatives we surveyed indicated they have some documented equity plan for their departments.
Chief Equity and Inclusion Officer with clear authority	Yes	The County designated a Chief Equity and Inclusion Officer (CEIO) in 2020 who reports directly to the County Executive and sits on the Senior Leadership Team. The CEIO has the authority to tell department directors what to do in terms of equity work.
Individual skills, i.e., the ability for people to answer questions related to equity outcomes	Partial	Agency equity representatives we surveyed indicated that many agency staff lack equity skills, which has made it difficult for them to effectively contribute to King County's equity goals.
Equity-focused tools provided to staff	Partial	OERSJ developed the Equity Impact Review (EIR) tool to help county staff identify, evaluate, and communicate the potential impact of a policy or program on equity. County agency representatives we surveyed indicated that the EIR is confusing and cumbersome. Notably, no one in our survey indicated that the tool was very or extremely effective. OERSJ plans to make updates to the EIR in order to improve its usefulness to agencies.

<p>Core Equity Team that operates at the organizational level and consists of representatives across multiple departments. The team's objective is to share departmental lessons and best practices</p>	<p>Partial</p>	<p>The Equity, Inclusion, and Belonging (EIB) managers accomplish some mutual support and knowledge sharing across departmental equity leaders, however these positions are limited to executive agencies and EIB managers do not exist in legislative or judicial branch agencies.</p>
<p>Strong data management system which includes each of the components in the next four rows below</p>	<p>No</p>	<p>There is no enterprise-wide equity-informed data management system. Please see specific components of an equity-informed data system in the next two rows.</p>
<p>Track the use of equity tools across the organization</p>	<p>No</p>	<p>Neither OERSJ nor county departments track the use of the County's equity tool, the EIR.</p>
<p>Track community indicators</p>	<p>No</p>	<p>In 2015, King County identified 67 community indicators that it intended to use to inform and assess the County's equity strategies over time. The County provided baseline data for community indicators in 2015, but there is no regular plan to track changes in these indicators.</p>
<p>Display community indicators in an external data dashboard</p>	<p>No</p>	<p>The County does not have a central dashboard to share how well its equity strategies are working. The Office of Performance, Strategy and Budget indicated that it is in the process of identifying an appropriate platform for a public dashboard to display and track community indicators.</p>
<p>Maintain a central repository of equity data</p>	<p>No</p>	<p>The County does not have a central repository for analyzing equity data that agencies can use to understand which communities may be disproportionately affected by their programs or policies.</p>

Equity change management element	Assessment (yes, no, partial)	Reason for assessment
PHASE IV: SUSTAINING		
Partnerships outside organization	Yes	King County does a lot of equity work through Public Health – Seattle & King County, which is a cross-jurisdictional agency with Seattle. King County has also been a member of the Government Alliance for Racial Equity. Almost all King County agencies we surveyed have external strategic partnerships.
Capacity for change: acknowledge the strains equity work will place on the existing capacity of agencies and develop strategies to support staff as they take on new responsibilities	Partial	OERSJ employees and EIB managers indicated that equity work places additional strain on staff and that they need more support to do this work.
Intra-organizational relationships to share best practices, insights from data, and resources to expanding capacity	Partial	Achieving this element of equity work is contingent upon governments establishing a core equity team, as described above in Phase III: Establishing Equity. EIB managers accomplish some of this mutual support and knowledge sharing through their relationships with departmental equity leaders.

Source: King County Auditor’s Office using International City/County Management Association framework

Appendix 3

Office of Equity, Racial and Social Justice Programs and Descriptions

The Office of Equity, Racial and Social Justice (OERSJ) indicates that the following table of programs and descriptions is current as of January 2023.

Program	Description	Number of staff	Year program added to OERSJ
Anti-Hate and Bias	Primary staff support for the activities and strategic initiatives of the Coalition Against Hate & Bias.	1	2020
Civil Rights, Americans with Disabilities Act Compliance, and Disability Equity	Review and process discrimination and Title IV complaints for King County government; manage Americans with Disabilities Act (ADA) compliance; coordinate ADA enterprise-wide; implement Disability Equity plan; advance disability justice.	4	Civil Rights and ADA: 2017 Disability Equity: 2020
Community engagement and Co-Creation	Develop and coordinate pro-equity engagement and co-creation principles and approaches and ensure enterprise-wide alignment, knowledge, skills, and abilities to effectively utilize those approaches.	3	2020
Data Management	On behalf of OERSJ, work with agencies across the executive branch to establish and implement data gathering, use, and analysis approaches to inform and report on metrics and outcomes, and help build OERSJ internal metrics.	0*	
Equity and Social Justice Policy Advisement	Provide strategic policy and guidance support to OERSJ and countywide equity and social justice (ESJ) work.	2**	2015
Equity and Social Justice Strategic Plan	Coordinate development of the next iteration of Equity and Social Justice Strategic Plan.	1.5	2022

Immigrant and Refugee Programs	Develop and coordinate education and training tools to support departments and agencies in fulfilling the requirements of King County Code 2.15, the Citizenship and Immigration Status Code, which outlines provisions on how to provide services to immigrants and refugees; collaborate with the Office of Civil Rights/ADA in the Department of Human Resources (DHR) to track enterprise-wide training completion, compliance, and enforcement of the code.	1	2018
Internal Investments and Capacity Building	With an internal focus, coordinate and advance ESJ work across King County through department Equity, Inclusion, and Belonging (EIB) network, Affinity Groups (Affinity Partnering Team), and other strategic partnerships such as OERSJ and DHR.	1	2020
Language Equity	Provides guidance and tools to departments, agencies, residents, and businesses as it pertains to accessible communications to individuals with limited-English proficiency, with the goal of coordinating and increasing language equity across the enterprise; administer and monitor department implementation of King County Code 2.15 language access mandates.	1	2015
Office Administrative Management and Leadership	Ensure that OERSJ internal systems and processes are in place to sufficiently manage the internal business of the agency.	3	2015
Strategic Communications	Create OERSJ and Chief Executive and Inclusion Officer internal and external communications strategies, networks, and approaches.	1	2021

*Not yet staffed

**While two staff primarily contribute to this program, senior leaders and others across OERSJ contribute to this work.

Source: Office of Equity, Racial and Social Justice

Executive Response

Dow Constantine

King County Executive

401 Fifth Avenue, Suite 800
Seattle, WA 98104

206-263-9600 Fax 206-296-0194

TTY Relay: 711

www.kingcounty.gov

February 28, 2023

KyMBER Waltmunson

King County Auditor

Room 1033

COURTHOUSE

Dear Ms. Waltmunson:

Thank you for the opportunity to review and comment on the proposed final report on the advancement of equity and social justice within King County government.

We appreciate the Auditor's understanding of the critical nature of this work for all the communities King County serves, especially those who have been historically oppressed and who, because of that history, continue to experience disparities in life circumstances and outcomes. We also appreciate the collaborative approach the audit team utilized throughout this process, all towards helping to ensure that King County and the Office of Equity, Racial and Social Justice (OERSJ) are able to maximize the impact of its efforts to become anti-racist and pro-equity in all facets of its work.

As you know, ending systematic racism and other forms of identity-based oppression is a journey and we thank you for clearly recognizing the advancements that King County and the OERSJ has made over the years, including those that have and continue to occur since the King County Executive declared racism to be a public health crisis in 2022. While that is the case, we know that there is still much more that must be accomplished for King County to reach its true north, a King County that is a welcoming environment where all people can thrive.

With that in mind, we have concurred with all of the recommendations, with the exception of one, where we partially concur:

Recommendation 16: The Office of Equity, Racial and Social Justice, in collaboration with other King County agencies, should expand its central map of equity data.

Our partial concurrence on this recommendation is in no way based on disagreement with the needs that this recommendation is meant to address, (i.e., to provide for data that is necessary to understand disparities and to track and report on progress toward positive community outcomes). Rather, it is

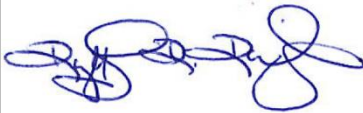
based on the central map approach identified in the recommendation. We believe there may be more user-friendly approaches to spatially display data to help agencies make equity-informed decisions.

We concur with the overarching themes represented in the draft report, namely the need for clearer roles and better-defined responsibilities across the government; the need to establish OERSJ's official governance and work structures; and the need to establish effective data sources and approaches to both inform anti-racist and pro-equity work, all of which are critical to advancing ESJ work in King County. Towards this end, you will note that the majority of the work to address the recommendations is already underway. Unfortunately, King County's limited revenue sources and the resulting constrained resources impact this important work in numerous ways, namely in the time needed to do the required work.

While that is the case, King County and the Office of Equity, Racial and Social Justice remain relentless on this path towards equity, racial and social justice for all; and insufficient resources can never mean insufficient outcomes. To this point, we invite you to consider the [Highlights from King County's Equity and Social Justice Plan \(arcgis.com\)](https://arcgis.com) published at the end of 2022.

Thank you again for recognizing the importance and the effectiveness of the work that King County and OERSJ has done to date and for the collaborative approach your office utilized throughout this audit process.

Sincerely,



Dwight Dively
Chief Operating Officer

cc: Shannon Braddock, Chief of Staff
Anita Whitfield, Chief Equity and Inclusion Officer
Jennifer Hills, Deputy Chief Operating Officer
Kelli Carroll, Director of Special Projects

Recommendation 1

The County Executive should ensure the update to the Equity and Social Justice Strategic Plan clearly defines and documents roles and responsibilities for the Office of Equity, Racial and Social Justice and county agencies.

Agency Response	
Concurrence	CONCUR
Implementation date	March 2024
Responsible agency	OERSJ
Comment	<p>This work is currently underway.</p> <p>By Ordinance 19541, effective January 1, 2023, functions & responsibilities of the Office of Equity, Racial & Social Justice (OERSJ) include:</p> <ol style="list-style-type: none"> 1. Defining the county's equity and racial and social justice outcomes with communities most affected by inequities; 2. Developing the county's strategies, practices, systems and processes to achieve equity and racial and social justice outcomes; 3. Providing strategic consultation to county agencies, and the communities they serve to achieve equity and racial and social justice outcomes; 4. Assisting county agencies to fulfill their responsibility to achieve equity and racial and social justice outcomes; and 5. Operating the civil rights program... <p>The update to the Equity and Social Justice Strategic Plan that is also currently underway will further define and document the roles and responsibilities for OERSJ and county agencies.</p>

Recommendation 2

The County Executive should identify, document, and communicate a process owner with the authority to monitor and track progress on the Equity and Social Justice Strategic Plan goals.

Agency Response	
Concurrence	CONCUR

Implementation date	May 2023
Responsible agency	OERSJ
Comment	This work is currently underway. A new position in OERSJ, Systems Implementation Manager, will serve as a process owner to help build an enterprise-wide approach to monitoring & tracking progress on the ESJ Strategic Plan goals.

Recommendation 3

The process owner identified in Recommendation 2 should work with agencies to monitor, measure, and report on the goals and objectives identified in the Equity and Social Justice Strategic Plan.

Agency Response	
Concurrence	CONCUR
Implementation date	March 2024
Responsible agency	OERSJ
Comment	This work is currently underway. In partnership with other County agencies (PSB, HR, etc.) the new Systems Implementation Manager will help develop approaches to tracking progress on Strategic Plan goals. An enterprise-wide accountability system will require participation from separately elected agencies .

Recommendation 4

The County Executive should incorporate agency feedback on improving goal tracking into the next iteration of the Equity and Social Justice Strategic Plan to ensure agency staff can implement and track progress on goals.

Agency Response	
Concurrence	CONCUR
Implementation date	March 2024
Responsible agency	OERSJ

Comment	<p>This work is currently underway.</p> <p>The ESJ Strategic Plan Project Manager and the various support teams have and will continue to consider effective tracking of plan goals. OERSJ, in coordination with the Strategic Plan Refresh project teams and other internal networks, will develop and facilitate an approach to seek input from County agencies.</p>
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Recommendation 5

The Office of Equity, Racial and Social Justice should document and implement the key office-level governance structures, including:

- vision, goals, objectives, and strategies
- organizational structures
- systems for employee competence
- methods to measure outputs and outcomes.

Agency Response	
Concurrence	CONCUR
Implementation date	December 2023
Responsible agency	OERSJ
Comment	<p>This work is currently underway.</p> <p>The Office of Equity, Racial and Social Justice has documented its organizational structure (provided to Auditor’s Office 1/30/22).</p> <p>OERSJ is currently working to identify output and outcome measures that can be gathered within existing resources.</p> <p>OERSJ has historically participated in the Executive branch's formal performance evaluation process, with the exception of 2021 where it did not utilize the standard form & process.</p>

Recommendation 6

The Office of Equity, Racial and Social Justice should develop key governance structures at the program level including documenting goals, objectives, and strategies; methods to measure outputs and outcomes; and policies and procedures.

Agency Response	
Concurrence	CONCUR
Implementation date	December 2023
Responsible agency	OERSJ
Comment	<p>This work is currently underway.</p> <p>OERSJ is in the process of developing detailed program specific workplans for 2023/2024. Completed workplans will include goals, objectives, strategies, and measurement. Policies and procedures will be incorporated where needed to increase clarity and effectiveness.</p> <p>OERSJ is preparing to recruit for the position of Chief of Staff, which will add capacity to advance this work.</p>

Recommendation 7

The Office of Performance, Strategy and Budget should finalize and publish its updates to the County's community indicators based on community input as planned.

Agency Response	
Concurrence	CONCUR
Implementation date	June2023
Responsible agency	PSB
Comment	None.

Recommendation 8

The Office of Equity, Racial and Social Justice should update the Equity Impact Review tool to improve the tool's usefulness.

Agency Response	
Concurrence	CONCUR

Implementation date	March 2024
Responsible agency	OERSJ
Comment	OERSJ will survey and gather information from users of the current Equity Impact Review (EIR) tool/process to improve usefulness. Additionally, the Office will evaluate the EIR processes of peer jurisdictions. This information will be used to update the existing EIR tool/process.

Recommendation 9

The Office of Equity, Racial and Social Justice should work with the Department of Human Resources to develop and implement a training for agencies on the updated Equity Impact Review process.

Agency Response	
Concurrence	CONCUR
Implementation date	September 2024
Responsible agency	DHR with support from OERSJ
Comment	The Department of Human Resources and OERSJ will work together to develop and implement a training for agencies on the updated Equity Impact Review process.

Recommendation 10

The Department of Human Resources should implement the Racially Just Competency as planned.

Agency Response	
Concurrence	CONCUR
Implementation date	March 2023
Responsible agency	DHR
Comment	The relaunch of the Racially Just Competency is currently scheduled to begin in March 2023. Additionally, the Department of Human Resources is developing a “leadership-go-first” approach, specifically for the Racially Just competency which will be followed by additional work to establish this competency throughout the enterprise.

Recommendation 11

The County Executive should identify and implement the best approach to facilitate sharing of equity information related to leading practices, insights from data, and lessons learned across King County.

Agency Response	
Concurrence	CONCUR
Implementation date	December 2023
Responsible agency	OERSJ
Comment	The development of a refreshed Inter-Branch Team is included in OERSJ's 2023 work planning.

Recommendation 12

The Office of Equity, Racial and Social Justice, in collaboration with agencies, should aggregate and maintain agency data on usage of the Equity Impact Review tool.

Agency Response	
Concurrence	CONCUR
Implementation date	March 2023
Responsible agency	OERSJ with support from PSB
Comment	None

Recommendation 13

The Office of Performance, Strategy and Budget should update community equity indicators in time to inform updates to the Equity and Social Justice Strategic Plan.

Agency Response	
Concurrence	CONCUR
Implementation date	June 2023
Responsible agency	PSB
Comment	<p>This work is in progress.</p> <p>PSB is coordinating closely with the ESJ Strategic Plan Update Project Manager to ensure that determinants of equity information is informing the ESJ Strategic Plan Refresh project.</p>

Recommendation 14

The Office of Performance, Strategy and Budget should develop a platform and use it to regularly report on changes in the community equity measures.

Agency Response	
Concurrence	CONCUR
Implementation date	December 2023
Responsible agency	PSB
Comment	<p>We concur that reporting on changes in the status of community indicators is critical for numerous equity driven reasons.</p> <p>PSB is currently developing a platform to report on community indicators as part of the Determinants of Equity update.</p> <p>More staff resourcing is needed to maintain and continuously update changes in community indicators.</p>

Recommendation 15

To help agencies make equity-informed decisions, the Office of Equity, Racial and Social Justice, in collaboration with other King County agencies, should conduct a needs assessment for equity data.

Agency Response	
Concurrence	CONCUR
Implementation date	March 2024
Responsible agency	OERSJ
Comment	This work is underway.

Recommendation 16

The Office of Equity, Racial and Social Justice, in collaboration with other King County agencies, should expand its central map of equity data to include information collected in Recommendation 15.

Agency Response	
Concurrence	PARTIALLY CONCUR
Implementation date	September 2024
Responsible agency	OERSJ
Comment	<p>As related to community indicators, the Determinants of Equity tool will substantially meet this need by broadening the indicator data sets that can be spatially displayed.</p> <p>OERSJ will partner with PSB, the County Demographer and KCIT GIS to design an approach which can be achieved within existing resources and which aligns with the County's data governance planning.</p>



Statement of Compliance, Scope, Objective & Methodology

Statement of Compliance with Government Auditing Standards

We conducted this performance audit in accordance with 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 on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Scope of Work on Internal Controls

We assessed the extent to which the County Executive has designed and implemented internal controls that will facilitate implementing and monitoring the Equity and Social Justice Strategic Plan (ESJ Strategic Plan) and associated outcomes. We also assessed the extent to which the Office of Equity, Racial and Social Justice (OERSJ) has designed and implemented internal controls at the office and program levels. In performing our audit work, we identified concerns relating to control environment, control and monitoring activities, and information and communication.

Scope

This audit reviewed the current (2022) status of equity structures and processes across King County with a focus on OERSJ. We included information from 2018 to the present related to implementation barriers, equity measurement, and/or context to current conditions.

Objectives

1. What barriers impact the County's ability to achieve its equity and social justice (ESJ) goals?
2. To what extent do countywide equity structures and processes align with leading equity change management practices?
3. To what extent does OERSJ have the foundational elements of agency management in place?
4. To what extent does the County effectively measure and communicate progress toward its ESJ goals?

Methodology

To understand barriers, learn about equity structures and processes, and evaluate measurement and communication, we interviewed senior staff in the Office of Performance, Strategy and Budget and OERSJ current and former staff. We reviewed documentation of employee feedback on the ESJ Strategic Plan implementation as well as of findings from a 2020 independent consultant assessment of OERSJ. In addition, we conducted a Qualtrics survey in August 2022 of Equity, Inclusion, and Belonging (EIB) managers and other representatives for county agencies with 150 or more staff. Superior Court and District Court representatives declined to participate. All 10 EIB managers completed the survey, and we got responses from four agencies that did not have EIBs, for a total of 14 responses. This accounted for 87.5 percent of the agencies that met our criterion (number of staff) and 100 percent of agencies that agreed to participate.

The County's efforts to become more equitable in its structures, policies, and services is a process of change management. To assess these efforts, we used John P. Kotter's 1996 book, *Leading Change: Why Transformation Efforts Fail*, which outlines an eight-step process for transforming an organization and making the change last. According to change management researchers, Kotter's book remains one of the most widely used change management resources. Kotter's eight steps include establishing a sense of urgency, creating and communicating a vision, planning for visible (measurable) performance improvements, and using the increased credibility from the improvements to change systems, structures, and policies that don't fit the vision. Kotter's recommendations dovetail with both standards of internal control and the paper referenced in the next paragraph. Internal control standards direct leaders to assess and respond to risks facing an agency as it seeks to achieve its objectives. The standards state that agencies should use quality information to achieve objectives and communicate quality information both internally and externally.

To evaluate countywide equity processes and structures (including measurement and communication of progress against goals), with respect to the International City/County Management Association (ICMA) December 2020 paper by Dr. Benoy Jacob, "Governing for Equity: Implementing an Equity Lens in Local Governments," we reviewed county ordinances and reports, including the Equity and Social Justice 2016–2022 Strategic Plan, information on county communications and structures, such as budget documents and staff reports, the County's Equity Impact Review tool, the appointment of a Chief Equity and Inclusion Officer, the declaration of racism as a public health crisis, training records from the Department of Human Resources, countywide employee engagement survey results from 2018–2022, and job descriptions for EIB managers.¹⁶ We also used information from the EIB survey and interviews of OERSJ and other staff mentioned above. In addition, we interviewed Dr. Benoy Jacob, author of the ICMA paper referenced above, who is the Director of the Community Development Institute, Division of Extension, and Affiliated Faculty at the LaFollette School of Public Affairs, University of Wisconsin-Madison. We also used guidance published by the Government Alliance on Race & Equity.

To review governance structures for agency management, as described below, we reviewed available documentation, surveyed lead staff in OERSJ's programs and interviewed OERSJ senior managers. We included programs (identified by OERSJ as lines of business in August 2022) that were responsible for a defined and ongoing body of programmatic work.¹⁷

Under King County Code 2.10.034 and 2.10.14, all executive branch and separately elected agencies are responsible for developing governance structures such as a mission and vision, as well as goals, objectives, strategies, and activities. We applied management criteria expanding on this requirement from:

- King County Auditor's Office, "[Foundational Elements of Department Management: Essential Tools and Audit Criteria](#)," October 2020.
- King County Auditor's Office, "[Goal Planning: Key Elements of a Performance Management Framework](#)," June 2016.

¹⁶ www.icma.org/page/governing-equity-implementing-equity-lens-local-government

¹⁷ This excluded general office administration, strategic communications, and the ESJ Strategic Plan update project. Also, at the time of our survey, the Language Equity and Immigrant and Refugee Programs were managed by the same person as a joint program.

- King County Office of Performance, Strategy and Budget, "[King County Strategic Planning Guidebook](#)," February 2016.
- King County Code, "[Title 2 Administration](#)," accessed December 15, 2022.
- US Government Accountability Office, "[Standards for Internal Control in the Federal Government](#)," September 10, 2014.

We evaluated OERSJ on a subset of the governance structure elements because the office is small and made up of programs that have their own governance structures. At the office level, we looked for mission, goals, objectives, strategies, organizational structures aligned with goals, clear reporting lines, methods to ensure employee competence, and output and outcome measures.

At the program level, we looked for goals, objectives, strategies, output and outcome measures, and documented policies and procedures. This was because the programs are significantly different from one another and would be best served by having independently documented policies and procedures. Other elements of governance, such as employee performance evaluations, would be managed at the office level.



List of Recommendations

Recommendation 1

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Recommendation 2

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Recommendation 3

The process owner identified in Recommendation 2 should work with agencies to monitor, measure, and report on the goals and objectives identified in the Equity and Social Justice Strategic Plan.

Recommendation 4

The County Executive should incorporate agency feedback on improving goal tracking into the next iteration of the Equity and Social Justice Strategic Plan to ensure agency staff can implement and track progress on goals.

Recommendation 5

The Office of Equity, Racial and Social Justice should document and implement the key office-level governance structures, including:

- **vision, goals, objectives, and strategies**
- **organizational structures**
- **systems for employee competence**
- **methods to measure outputs and outcomes.**

Recommendation 6

The Office of Equity, Racial and Social Justice should develop key governance structures at the program level including documenting goals, objectives, and strategies; methods to measure outputs and outcomes; and policies and procedures.

Recommendation 7

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Advancing Performance & Accountability

KING COUNTY AUDITOR'S OFFICE

KYMBER WALTMUNSON, KING COUNTY AUDITOR

MISSION Promote improved performance, accountability, and transparency in King County government through objective and independent audits and studies.

VALUES INDEPENDENCE • CREDIBILITY • IMPACT

The King County Auditor's Office is committed to equity, social justice, and ensuring that King County is an accountable, inclusive, and anti-racist government. While planning our work, we develop research questions that aim to improve the efficiency and effectiveness of King County government and to identify and help dismantle systemic racism. In analysis we strive to ensure that communities referenced are seen, not erased. We promote aligning King County data collection, storage, and categorization with just practices. We endeavor to use terms that are respectful, representative, and people- and community-centered recognizing that inclusive language continues to evolve. For more information, see the King County [Equity and Social Justice Strategic Plan](#), King County's [Statement on Racial Justice](#), and the King County [Auditor's Office Strategic Plan](#).

ABOUT US The King County Auditor's Office was created by charter in 1969 as an independent agency within the legislative branch of county government. The office conducts oversight of county government through independent audits, capital projects oversight, and other studies. The results of this work are presented to the Metropolitan King County Council and are communicated to the King County Executive and the public. The King County Auditor's Office performs its work in accordance with Government Auditing Standards.



This audit product conforms to the GAGAS for independence, objectivity, and quality.