

RACIAL EQUITY ACTION PLAN PHASE 1 EVALUATION

Municipal Transportation Agency Observations and Recommendations for Progress Report

As a City, we are collectively and individually accountable for racial equity. This written feedback is intended to support your department in fulfilling that accountability as you continue to implement and update your plan, and as you reflect on change and obstacles in your next progress report.

Observations and recommendations for your department's Racial Equity Action Plan ("plan") are summarized below. This is a holistic view of the plan document submitted by the department in January 2021, taking into consideration the dimensions of **Spirit, Data, Roadmap, and Transformation**.

The Racial Equity Action Plan is a strategic document to baseline dignity, justice, access and belonging in your department. It reflects your department's intentions and next steps as documented on paper at only a single moment in time, and should be continuously revised and updated as your department grows. The implementation will not be one directional or linear, and will always be a work in progress.

SPIRIT

The plan states that the department "has a significant responsibility to almost 6,000 employees to dismantle any harmful cultures, practices, and policies that reinforce anti-Blackness, structural racism and bias in the workplace." It further acknowledges that "transportation programs and policies have reduced access to opportunities... and created inequitable outcomes" for Black, American Indian, and People of Color in San Francisco, and that this holds true for both "SFMTA and its previous iterations."

At the same time, the plan primarily references history from over a century ago, while omitting recent issues and disparities raised by the community. Any plan to address racial equity must be grounded in truth and genuineness. In order to solve a problem, we must understand how we got there in the first place. **The department should demonstrate a clear understanding of how racial injustice is created within its work, as well as within its organization, and how this affects its employees.** In the words of James Baldwin: "Not everything that is faced can be changed, but nothing can be changed until it is faced."

DATA

The plan includes some quantitative findings about racial disparities across classifications. For instance, it notes that over 9 out of 10 Transit Operators are BIPOC, while half of senior management is white and 67% of the Executive Team is white. Black employees make up under a third (28%) of the overall department, yet more than half (55%) of the employees terminated in 2020 were Black.

The plan also draws on two department surveys and a set of employee interviews. One of the surveys found that fewer than 3 out of 10 employees in customer-facing or transit supervision roles were confident in department

leadership, and that a majority of them did not express overall satisfaction with the department. The plan notes that BIPOC employees “have frequently reported feeling unheard, that they have little to no control over their work environment, and that they are unable to give feedback to improve their workplace for themselves and their colleagues.” It would be helpful to make the previous surveys and interview results accessible through the plan, as well as to disclose the response rate and demographics of participants.

The department should analyze employee demographics and experiences in more intersectional ways and ensure that the implementation steps in the plan are updated to address the causes of specific disparities. For instance, the plan notes that discipline rates “are alarmingly disproportionate for African American and Black women when compared to the general makeup of the classification.” This is an important and specific finding, and the plan narrative describes how the department should “fully understand not just the drivers of the disproportionality at the agency, but also the impact of racist housing policy and childcare responsibilities on attendance violations.” However, none of the actual implementation steps seem targeted towards this specific disparity or approach.

The plan describes metrics and dashboards that will be created to measure performance and support decision-making on an ongoing basis. **It should also include implementation steps to share these with the department more broadly, as well as note any processes that will be used to obtain, maintain and secure data on an ongoing basis.**

ROADMAP

The department has established goals for each section based on an assessment of “current conditions.” While the assessment is detailed, the goals are very general. **The goals should be measurable and baselined against existing data.** Without specific and measurable goals, it will be difficult to assess progress.

The plan diverges significantly from the template to “reflect feedback from our staff, be impactful in our unique operating environments, support our action leads, and account for capacity constraints.” It categorizes the actions by priority and includes several new objectives and actions specific to the department, especially around discipline and separation. However, it also omits some important actions that are required by ORE. ORE asked departments to address the actions in the template to create a common baseline across all departments. Some areas in the template that are not fully detailed in the plan include:

- Section 1: rejecting degree inflation; interrupting “feeder models” from elite institutions; decreasing wait times; expanding beyond the Certification Rule of Three Scores
- Section 2: compensation and benefits
- Section 5: centering and meeting individual staff needs; highlighting advancement opportunities for each employee
- Section 6: digital and physical accessibility; translation services; fostering relationships with external community
- Section 7: updates to bylaws, rules of order, other protocols; land acknowledgment

The plan should include implementation steps for all of the objectives and actions outlined by the Office of Racial Equity. For ongoing or completed actions, the plan should also include steps to assess whether those actions have yielded their intended results.

Many of the actions around analyzing data and updating policies do not include implementation steps to make decision-making more transparent and accessible. **The plan should describe how information that is used to implement each action will be shared and validated with staff who are most likely to be affected by decisions.**

The plan clearly names the individual employee that is responsible for leading each action. It states that these responsibilities will be reflected in those employees' performance plans. A potential area of concern is that many actions are assigned to a small number of individuals, or even to vacant positions. **The plan should clarify who is accountable for final decisions as well as who will be called on to support the lead.**

The plan notes which actions can be accomplished with existing staff and budget; which actions can be accomplished by deprioritizing other work; and which actions require new staff or budget. However, the additional resource needs are not estimated. Material resources are also not included in the plan. **The resources for each action, such as staff and budget, should be scoped in further detail.** It is important to ensure that staff who are named in the plan as responsible are actually equipped with the resources and decision-making authority to successfully make change.

The timelines for the actions are also very clear, to the month and year. However, some actions are not planned to result in meaningful change until 2023, or even 2025. There does not seem to be a clear relationship between the "priority" level of an action and its target date for implementation. **The plan should result in timely change.** If this requires increasing or shifting resourcing, this should be discussed in the plan.

Lastly, consider adding risk mitigation or contingencies to the plan. **Plan implementation could include steps for monitoring, avoiding, or mitigating identified and potential risks and unexpected issues that may arise from addressing racial inequities within the department.** For instance, besides resource and schedule needs, this may need to involve accounting for people's internal motivations, understanding external sociopolitical movements, and socializing new ideas and processes.

TRANSFORMATION

Ultimately, the purpose of racial equity work is to move our City towards **Transformation**. While this was not an individual section of the Racial Equity Action Plan template, we offer these additional reflections to inform your department's continued work:

Many of the implementation steps in the plan do not name or center race. Moreover, important actions around analyzing the recruitment process for racial disparities and conducting regular department surveys are listed as "not currently feasible for implementation" due to budget priorities. **The implementation steps should establish how employees will be empowered to identify the causes of racialized outcomes and inequitable systems that are within the department's control. The plan should also commit to changing internal decision-making structures to repair trust and empower BIPOC staff.** The people closest to the pain should be closest to the power, as they have the knowledge and expertise that is required to address the department's racial equity challenges.

While most actions have quantitative employee-centered outcomes identified, such as demographics and participation rates, there are few to no qualitative outcomes listed. **Every aspect of making BIPOC staff "net better off" in the workplace should be addressed in tangible ways in the plan: financially; emotionally and mentally; relationally; physically; and purposefully.** Every employee is a person, not only a worker.

CLOSING THOUGHTS

We appreciate that a self-assembled group of department staff created a plan beginning in 2018, and that a steering committee, project team, and action leads were later established to formalize and finalize the plan.

We were also encouraged to see the following outlined in your plan:

- Committing to add Racial Equity Action Plan implementation steps to specific employees' performance plans;
- Identifying specific alternatives to discipline, such as counseling and resources;
- Creating a department-wide Manager Training Program;
- Periodically reviewing each supervisor's/manager's record of disciplinary decisions for consistency, proportionality, and fairness.

Along the continuum of becoming an anti-racist organization, the Racial Equity Action Plan indicates that the department is emerging into the "symbolic change" and "identity change" stages. As your department continues implementing its Racial Equity Action Plan, we urge you to continuously measure and reflect on progress towards **Transformation:**

- **How will you move to increase transparency of decision-making and repair trust, especially with Black employees who have been disproportionately disciplined? How will you hold all management accountable for this work?**
- **How will you compensate, mentor, and promote BIPOC workers, both permanent and temporary, in a way that truly values the depth of the experience and expertise they have gained from years of committed and essential work?**
- **How will you accelerate actions to make concrete changes in hiring, retention, promotion, discipline, and internal work culture before the end of 2021?**

We understand that the Racial Equity Action Plan can only capture what is planned at a moment in time. We know that over the last year your department has been implementing and adapting your plan. We look forward to learning more about the meaningful changes your department is making for employees, especially those who are Black, American Indian, and People of Color, in your March 2022 progress report. Thank you for your continued partnership in this transformational work.