

PURPOSE

APD is committed to equity and its infusion into multiple facets of work. The purpose of the APD Equity Impact Protocol is to ensure critical thought and consideration of diverse consumers and providers prior to and during the development of APD rules and policies. It intends to minimize unintentional impacts and serves to prevent the perpetuation of bias and discrimination in Oregon's APD system.

Rule and policy writers are expected to use the APD Equity Lens as a resource and accompaniment, as it contains information designed to help clarify important equity concepts. It also contains a list of questions that APD staff can use when exploring the impact of policies and rules on different populations. The APD Equity Lens is available [here](#).

RULES and POLICIES

The protocol is specifically designed for use during the rule development process. The intention is that thought be given to potential impacts prior to the finalization of rules. By identifying potentially impacted populations on the front end, it opens an opportunity to engage those stakeholders in the process.

While the protocol may be used in new policy development or revisions, it is not necessarily required. Policy development includes a set of processes that incorporate the Equity Lens into Policy Transmittal Writing Guidance.

THE PROTOCOL

There are three steps to the Policy/ Rule Review process.

- I. Policy/ Rule Review Packet Submission. Policy impact reviews must occur prior to finalization of all APD policies. Review submissions must include the following:
 - Who Submits the Packet: The person responsible for drafting or overseeing the development of the new or amended policy/ rule is responsible for the timely submission of the Policy/ Rule Review Packet and review request.
 - What does the Packet Contain: Policy/ Rule Review Packet must be submitted to the contact person identified below. Documentation must include the following information:
 1. Draft policy/ rule set;
 2. Responses to Questions for Ensuring Strategic and Equitable Policies and Rules (see below); and
 3. Supporting documents and important background materials.

APD Equity Impact Protocol

- When Should the Packet be Submitted: The Policy/ Rule Review Packet should be received a minimum of two weeks before any anticipated communication with internal and/ or external partners.

During the rules making process, a review packet may be submitted at two different points. The first is prior to convening the Rules Advisory Committee (RAC). The second point is prior to the rule being filed with the Secretary of State.

It is important to acknowledge the challenge of time when trying to finalize policies and rules. As such, considerations to the timeline should be made early in the process. As APD staff, there is an expectation that equity be at the forefront of thought, rather than an afterthought. If a policy or rule is completed without the protocol, an opportunity to apply the equity lens and be intentional about the potential impacts of our work on consumers and providers is lost.

Policies and rules enacted prior to the promulgation of this protocol can still be reviewed following the same process outlined herein.

- Where Should the Packet Be Submitted: Policy/ Rule Review Packets should be submitted electronically to Kelsey Gleeson at: KELSEY.GLEESON@dhsosha.state.or.us. Review packet submissions will be tracked.

II. Equity Impact Protocol (EIP) Team Review. The EIP team meets on a weekly basis. Within two weeks of the time of submission, the EIP team will:

- Review policy packet submission; and
- Prepare feedback on the submitted policy/ rule.

III. Review Wrap-up

- Upon completion of the Review, the EIP team will communicate recommendations with policy/ rule review requestor.

QUESTIONS FOR STRATEGIC AND EQUITABLE POLICIES AND RULES

The following questions are taken from the [APD Equity Lens](#) and should be addressed and included in the Policy/ Rule Review Packet.

1. What does the policy/ rule/ work aim to accomplish?
2. Which specific communities are affected by the policy/ rule/ work initiative?
3. Describe how the policy/ rule/ initiative meets the needs of consumers representing diverse backgrounds.

4. What are the potential unintentional consequences or social, political, emotional, economic, and other impacts of the policy/ rule/ work on the groups identified? Does the policy/ rule ignore or worsen existing disparities? How could adverse impacts be minimized?
5. How does the policy/ rule/ initiative reflect ODHS equity goals concerning [Diversity and Inclusion and Service Equity](#)?
6. Given the potentially impacted populations you identified, will the policy, rule, or other work outputs be available in other languages? If so, which languages? If not, describe your rationale not offering the policy/ rule/ work in different languages.
7. Describe your plan for communicating the new, or modified policy/ rule/ initiative to potentially impacted communities.
8. Describe the data collection strategy for identifying and tracking impacts of the policy/ rule/ initiative on consumers representing diverse backgrounds. What does success look like?