

December 12, 2023

White House Office of Science and Technology Policy  
Attention: Dr. Kristi Pullen Fedinick  
Assistant Director of Environmental Justice Science and Technology

**Re: Request for Information to Support the Development of a Federal Environmental Justice, Science, Data, and Research Plan (OSTP-CE-2023-0012)**

*Submitted electronically via [www.regulations.gov](http://www.regulations.gov)*

The Association of American Medical Colleges (AAMC) and the AAMC Center for Health Justice (CHJ) appreciate the opportunity to provide comments to the White House Office of Science and Technology Policy (OSTP) on strategies to “identify and address gaps in science, data, and research related to environmental justice”<sup>1</sup> and inform OSTP’s *Environmental Justice Science Data, and Research Plan* in furtherance of Executive Order 14096, *Revitalizing Our Nation’s Commitment to Environmental Justice for All* (EO 14096).<sup>2</sup> We are deeply committed to helping our member medical schools and teaching hospitals better understand the impact of climate change and environmental justice on our health, environment, and the economy.

The AAMC is a nonprofit association dedicated to improving the health of people everywhere through medical education, health care, medical research, and community collaborations. Its members are all 158 U.S. medical schools accredited by the [Liaison Committee on Medical Education](#); 13 accredited Canadian medical schools; approximately 400 teaching hospitals and health systems, including Department of Veterans Affairs medical centers; and more than 70 academic societies. Through these institutions and organizations, the AAMC leads and serves America’s medical schools and teaching hospitals and the millions of individuals across academic medicine, including more than 193,000 full-time faculty members, 96,000 medical students, 153,000 resident physicians, and 60,000 graduate students and postdoctoral researchers in the biomedical sciences. Following a 2022 merger, the Alliance of Academic Health Centers and the Alliance of Academic Health Centers International broadened the AAMC’s U.S. membership and expanded its reach to international academic health centers.

The goal of the CHJ, founded in 2021, is for all communities to have an equal opportunity to thrive — a goal that reaches well beyond medical care. Achieving health equity means addressing the common roots of health, social, and economic injustices and implementing policies and practices that are explicitly oriented toward equal opportunity. The CHJ partners with public health and community-based organizations, government and health care entities, the private sector, community leaders, and community members to build a case for health justice through research, analysis, and expertise. For more information, visit [aamchealthjustice.org](http://aamchealthjustice.org).

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<sup>1</sup> 88 Federal Register 7104.

<sup>2</sup> Executive Order on Revitalizing Our Nation’s Commitment to Environmental Justice for All, <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/04/21/executive-order-on-revitalizing-our-nations-commitment-to-environmental-justice-for-all/> (Accessed Dec. 4. 2023).

We appreciate OSTP’s environmental justice activities and the steps the Federal government is taking to ensure a whole-of-government approach to environmental justice by galvanizing action across Federal agencies to identify research gaps and “inadequacies that may affect agencies’ ability to advance environmental justice [...]”<sup>3</sup> In support of these efforts, The CHJ is actively working with its Multisector Partner Group<sup>4</sup> and health equity community (Collaborative for Health Equity: Act, Research, Generate Evidence, also known as “CHARGE”)<sup>5</sup> to launch programs, conduct research, and identify policies or practices that “chang[e] unjust structural conditions deeply ingrained in our built environment and social and economic systems.”<sup>6</sup>

The AAMC’s commitment to climate health is also exhibited by our *Health Sector Climate Pledge*,<sup>7</sup> joining the Biden Administration in an effort to reduce greenhouse gases by 50% by 2030.<sup>8</sup> Additionally, last year AAMC conducted a study on climate action in academic medicine which included a survey, analysis of public data, interviews with CEOs of teaching hospitals and medical school deans, and a curriculum analysis, resulting in the report: *Climate Action in Academic Medicine: An Overview of How Medical Schools and Teaching Hospitals are Responding to Climate Change*.<sup>9</sup> One notable finding was that momentum and interest in climate action is growing among teaching hospitals and health systems. Specifically, 65% of CEOs at AAMC-member teaching hospitals and health systems (n=67) reported having discussions about reducing greenhouse gas emissions in the last 12 months, 47% are taking steps to prepare for climate change through educational research, clinical delivery, or community engagement, and 43% are engaging in discussions on the impact of climate change on environmental justice, health justice, and health equity.<sup>10</sup> The AAMC also serves in a leadership capacity in the *National Academy of Medicine Action Collaborative on Decarbonizing the U.S. Health Sector*<sup>11</sup> and the CHJ recently joined the *National Academy of Medicine Climate Communities Network* as a strategic partner to co-develop solutions related to climate health inequities by amplifying community voices and lived experiences.<sup>12</sup>

In the comments below, we respond to three aspects of OSTP’s RFI, expressing overwhelming support for the following:

- Using science, data, and research to support policies that promote environmental justice
- Prioritizing the development of common environmental justice principles, terms, and definitions
- Developing activities that have a profound impact on environmental justice such as coordinated multi-sector model for information and data sharing

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<sup>3</sup> *Id.*

<sup>4</sup> AAMC Center for Health Justice, Multisector Partner Group, <https://www.aamchealthjustice.org/multisector-partner-group>.

<sup>5</sup> AAMC Center for Health Justice, CHARGE, <https://www.aamchealthjustice.org/get-involved/aamc-charge>.

<sup>6</sup> American Public Health Association. Addressing Environmental Justice to Achieve Health Equity. Nov 2019. <https://uat.apha.org/policies-and-advocacy/public-health-policy-statements/policy-database/2020/01/14/addressing-environmental-justice-to-achieve-health-equity>.

<sup>7</sup> Join Biden Administration’s Pledge to Reduce Greenhouse Gas Emissions 50% by 2030 <https://www.whitehouse.gov/briefing-room/statements-releases/2022/06/30/fact-sheet-health-sector-leaders-join-biden-administrations-pledge-to-reduce-greenhouse-gas-emissions-50-by-2030/> (Accessed Dec. 1, 2023)

<sup>8</sup> AAMC Joins Biden Administration Pledge to Decarbonize Health Care Sector, <https://www.aamc.org/news/press-releases/aamc-joins-biden-administration-pledge-decarbonize-health-care-sector>.

<sup>9</sup> Climate Action in Academic Medicine: An Overview of How Medical Schools and Teaching Hospitals and Health Systems are Responding to Climate Change (November 2022), <https://www.aamc.org/media/64106/download?attachment>.

<sup>10</sup> *Id.*

<sup>11</sup> National Academy of Medicine Action Collaborative on Decarbonizing the U.S. Health Sector <https://nam.edu/programs/climate-change-and-human-health/climate-collaborative-members/> (Accessed Dec. 4, 2023).

<sup>12</sup> Network Focused on Community-Driven Climate Solutions Announces Members and Strategic Partners <https://nam.edu/network-focused-on-community-driven-climate-solutions-announces-members-and-strategic-partners/> (Accessed Dec. 4, 2023).

- Ensuring meaningful community engagement to build and maintain public trust and improve research, programs, and policies.

## **I. Development and Use of Science, Data, and Research to Support Environmental Justice Policy**

The OSTP has requested feedback on the collection and use of environmental justice data, including data the Federal government should prioritize (Q.1a) and the “biggest opportunities” for advancing environmental justice related decision-making in Federal research and grant programs (Q.1b).

### **Environmental Justice Principles and Terminology**

The CHJ recommends infusing principles of equity and justice in agency rulemaking, programs, public engagement processes, and other climate and environmental justice activities. We note that EO 14096 requires the establishment of mechanisms to achieve inter-agency coordination on environmental justice issues, recommending the Director of OSTP convene an Environmental Justice Subcommittee (OSTP Subcommittee). It also requires the designation of an Environmental Justice Officer within each agency to serve as a representative of the White House Environmental Justice Interagency Council (Interagency Council). As stated in the RFI, a goal for the OSTP Subcommittee and agency partners is the development of an *Environmental Justice Science, Data, and Research Plan*. We urge the OSTP Subcommittee to develop and adopt common environmental justice principles, definitions, and terminology that can be used consistently across departments and agencies.

The OSTP Subcommittee, Interagency Council, and other key agency partners should also leverage existing resources to develop guidance in the form of a language guide and/or glossary that covers key terms and definitions for use by Federal agencies, community partners, environmental justice advocates, and other interested individuals and entities. For example, EPA’s 2013 guidance: *Environmental Justice-Related Terms as Defined Across the Partnerships for Sustainable Communities Agencies*<sup>13</sup> and the *EJ 2020 Glossary*<sup>14</sup> are two resources that could serve as helpful references, recognizing that the principles and definitions in this guidance have likely evolved since publication. The OSTP should also solicit first and third-person narratives to ensure the language guide (and other resources) are applicable to racially and ethnically diverse communities,

As members of a collective global community, we have a social responsibility to consider ways to dismantle environmental racism through the use of language that is precise, inclusive, respectful, and action oriented. It is critical for OSTP to ensure that its environmental justice initiatives intentionally omit and seek to remove examples of polarizing terminology, especially terms that reinforce racial and ethnic hierarchy and white supremacy in light of the growing multi-racial diversity in the U.S (e.g., “[a]void use of adjectives such as vulnerable, marginalized and high-risk.”<sup>15</sup>) As noted in the CHJ and American Medical Association *Guide to Language Narrative and Concepts*, “[d]ominant narratives create harm, undermining public health and the advancement of health equity; they must be named, disrupted and corrected.” Dominant narratives also protect privileged groups, reinforcing divisions between populations and communities and impedes momentum toward equality and justice.<sup>16</sup>

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<sup>13</sup> Environmental Justice-Related Terms As Defined Across the PSC Agencies, <https://www.epa.gov/sites/default/files/2015-02/documents/team-ej-lexicon.pdf> (Accessed Dec. 4, 2023).

<sup>14</sup> EJ 2020 Glossary, <https://www.epa.gov/environmentaljustice/ej-2020-glossary> (Accessed Dec. 4, 2023).

<sup>15</sup> Association of American Medical Colleges, American Medical Association, Advancing Health Equity: A Guide to Language, Narrative and Concepts (2021), <https://www.ama-assn.org/system/files/ama-aamc-equity-guide.pdf>.

<sup>16</sup> *Id.*

Finally, the *Federal Plan for Equitable Long-Term Recovery and Resilience*, (ELTRR),<sup>17</sup> which “lays out a government-wide approach for federal agencies to cooperatively strengthen the conditions necessary for improving individual and community resilience and well-being nationwide,” provides a guiding framework and pre-existing partnership, both of which would facilitate the alignment of purpose, approach, and language for environmental justice efforts. The ELTRR workgroup, comprised of over 40 federal agencies and departments, including the Environmental Protection Agency (EPA) and Department of Health and Human Services, has adopted the “Vital Conditions for Health and Well-Being Framework” which provides an organizing structure with a focused attention on a “small but comprehensive set of conditions that all people depend on to reach their full potential for health and well-being.”<sup>18</sup> A “Thriving Natural World” is one of the framework’s seven domains.

### **Key Activities and Considerations for Advancing Environmental Justice Research**

We would like to highlight several activities and considerations that OSTP should take into account as it takes steps to develop the *Environmental Justice Science, Data, and Research Plan*.

- **EPA Proposed Guidance (Nov. 2023) — Revised Technical Guidance for Assessing Environmental Justice in Regulatory Analysis (88 FR 78358) & Draft Policy, Achieving Health and Environmental Protection Through EPA’s Meaningful Involvement Policy (88 FR 78747)**  
The EPA recently issued draft guidance that updates how agencies evaluate environmental justice during regulatory actions, providing recommendations on analytic and technical approaches that should be utilized during this process.<sup>19</sup> This guidance builds on EPA’s guidance from 2016 to ensure alignment with revised definitions and terminology consistent with EO 14096. We also note that the EPA has issued a request for comment on the Agency’s *Meaningful Involvement Policy* which supersedes the 2003 *Public Involvement Policy* and is cross referenced in the draft Technical Guidance.<sup>20</sup> Given the unique timeliness of both draft guidance and the significant topical overlap with OSTP’s RFI, we encourage swift coordination to ensure efficient bi-directional sharing of information received in response to both RFIs.
- **NIH RFI (Oct. 2023) — Environmental Justice Research Gaps, Opportunities and Capacity Building (NOT-ES-23-016)**  
Another effort that OSTP should note is the National Institutes for Health (NIH) recent RFI on the specific needs and tools to address environmental justice research gaps, build community partnerships, support a diverse workforce, and advance Federal decision-making pursuant to EO 14096. Over the last few years, the NIH has taken meaningful steps toward climate change and health research but acknowledges in the RFI that “more transformative, solutions-oriented research is needed across the NIH on environmental justice [...]” to improve the health of affected communities in the U.S. and globally.<sup>21</sup> The CHJ plans to respond to this RFI, reinforcing many of the same recommendations included here. Notably, one issue that is not explicitly addressed in OSTP’s RFI, is the need for a diverse and inclusive environmental justice workforce, including strategies for increasing diversity, equity, accessibility, and inclusion. Effectively addressing environmental issues that disproportionately impact historically marginalized individuals and groups requires concerted

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<sup>17</sup> Federal Plan for Equitable Long-Term Recovery and Resilience , <https://health.gov/our-work/national-health-initiatives/equitable-long-term-recovery-and-resilience> (Accessed Dec. 4, 2023).

<sup>18</sup> Organizing Around Vital Conditions Moves The Social Determinants Agenda Into Wider Action, <https://www.healthaffairs.org/content/forefront/organizing-around-vital-conditions-moves-social-determinants-agenda-into-wider-action> (Accessed Dec. 4, 2023).

<sup>19</sup> Technical Guidance for Assessing Environmental Justice in Regulatory Analysis, [https://www.epa.gov/system/files/documents/2023-11/ejtg\\_revision\\_110823\\_508compliant\\_0.pdf](https://www.epa.gov/system/files/documents/2023-11/ejtg_revision_110823_508compliant_0.pdf).

<sup>20</sup> Meaningful Involvement Policy, <https://www.epa.gov/environmentaljustice/epas-meaningful-involvement-policy> (Accessed Dec. 4, 2023).

<sup>21</sup> Request for Information (RFI): Environmental Justice Research Gaps, Opportunities and Capacity Building <https://rfi.grants.nih.gov/?s=6508990aaec4ec015d06fb82>.

efforts to rectify racial and ethnic disparities in the environmental health workforce.<sup>22</sup> We appreciate NIH's interest in this issue and support its broader goals to foster inclusive excellence by increasing scientific workforce diversity (see, *AAMC Comments on Draft NIH Chief Officer for Scientific Workforce Diversity Strategic Plan*).<sup>23</sup> The OSTP should coordinate with NIH to facilitate bi-directional sharing of information from both RFIs, especially on the topics and issues that are not addressed in each respective request.

▪ **Coordinated Model for Information and Data Sharing**

We appreciate OSTP's interest in identifying ways to translate environmental justice research and data into action (e.g., policy and programs), understand data gaps, data collection challenges, and the use of different types of information (e.g., Indigenous Knowledge) to inform governmental decision-making. Specifically, EO 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* requires the establishment of an *Interagency Working Group on Equitable Data* (Data Working Group).<sup>24</sup> The Data Working Group has been actively considering ways to “facilitate the sharing of information and best practices [...]” and in April 2022, released recommendations on ways to advance and measure equity and diversity in federal data collection programs.<sup>25</sup>

As emphasized throughout this letter, we wholly support efforts that increase inter-agency collaboration but are concerned that the requirements for a coordinated government approach as set forth in EO 13985 and EO 14096, fall short of achieving effective multi-sector collaboration during a time when there is an *immediate need* to create a sustainable infrastructure that elevates collaboration between the federal government, states, Tribal, territorial, and local governments, academic institutions, private/nonprofit sectors, community organizations, and other entities. For example, OSTP, EPA, and NIH have each recently issued public requests for comment on advancing environmental justice activities across the federal government. In furtherance of OSTP's role in coordinating agency activities, OSTP could have coordinated with EPA and NIH and issued this RFI as a multi-agency request. We believe this would have increased the depth and richness of the public feedback. It also would have demonstrated how OSTP is fulfilling its responsibilities and commitment to advance environmental justice and increase interagency collaboration pursuant to EO 14096. Given the similarities between the three requests, we hope that OSTP, EPA, and NIH collaborate and share key ideas gathered through the public comment mechanism as it is likely that key information may only be submitted in response to one of the three.

Finally, the aforementioned ELTRR led by the Assistant Secretary for Health's Office also offers an existing opportunity for enhanced alignment. Given that multisector and multiagency coordination is ELTRR's goal, we encourage OSTP and other departments and agencies interested in environmental justice to tap into that ready-made partnership to facilitate alignment and efficiency of requests for public comment as well as other overlapping efforts. As previously noted, one important aspect of the ELTRR is the incorporation of the seven vital conditions for health and well-being. We are pleased to see the recent release of the OSTP Domestic Policy Council's *Playbook to Address Social Determinants of Health*, recognizing that “[a]ddressing social determinants of health must prioritize

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<sup>22</sup> Harrington JM, Hawkins S, Lang M, et al. The Need for a Diverse Environmental Justice Workforce: Using Applied Research to Understand the Impacts of Harmful Environmental Exposures in Vulnerable and Underserved Communities (September 2022).

<sup>23</sup> AAMC Comments, e Draft NIH Chief Officer for Scientific Workforce Diversity Strategic Plan for FYs 2022-2026 (NOT-OD-22-054), <https://www.aamc.org/media/58846/download?attachment>.

<sup>24</sup> Executive Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through Federal Government*, January 20, 2021.

<sup>25</sup> The Release of the Equitable Data Working Group Report, <https://www.whitehouse.gov/ostp/news-updates/2022/04/22/the-release-of-the-equitable-data-working-group-report/> (Accessed Dec. 4, 2023).



environmental justice as a key building block in creating health communities.”<sup>26</sup> We also appreciate that the Playbook highlights the connections between OSTP’s environmental justice RFI and how the vital conditions for health framework can help identify and address data gaps related to environmental justice.

▪ **Collection of Race and Ethnicity Data & Other Demographic Data**

The Office of Management and Budget (OMB) is in the process of revising its *Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity* (SPD 15) which was initially issued in 1977 and revised once in 1997.<sup>27</sup> The CHJ submitted comments to OMB supporting several changes, including the collection of race and ethnicity information using a combined question and the use of detailed race and ethnicity categories by default.<sup>28</sup> We also supported the inclusion of a new reporting category: Middle Eastern or North African (“MENA”) as well as the removal and updates to certain terms and definitions (e.g., discontinuation of “majority/minority,” “tribal affiliation or community attachment” in the American Indian or Alaska Native definition). Given the breadth of the revisions to SPD 15 and impact on *all* federal data collection (including research related to climate change and environmental justice), we strongly encourage OSTP assist OMB with the coordination, dissemination, and implementation of the finalized recommendations when released in summer 2024.

In the interest of accountability, we also recommend OSTP integrate evidence-based mechanisms for the prospective and retrospective review of agency activities (e.g., policies, regulations, agency programs). This would help to proactively identify and address potential barriers and burdens, in addition to providing useful evidence on whether agencies are meeting the objectives of EO 14096. For example, in EPA’s *Draft Technical Guidance for Assessing Environmental Justice in Regulatory Action*, the Agency notes that environmental justice concerns would greatly benefit from the development of tools that help increase the “integrity, objectivity, and quality of data when evaluating EJ concerns.”<sup>29</sup> To promote data quality and policy evaluation, we encourage the development of new tools and continued evaluation of existing processes that help agencies assess environmental risks and implications of environmental stressors using a framework such as an “environmental impact assessment” or “cumulative impact assessment.” Notably, EPA does not have guidance on the use of a cumulative impact assessment in the context of rulemaking despite its use of other assessment processes such as the Health Impact Assessment, commonly applied in a local community context.<sup>30</sup>

We recognize that integrating evaluation mechanisms in agency research programs requires tremendous coordination with internal and external partners, including support for data infrastructure and interoperability. The OSTP, Interagency Council, and Interagency Working Group on Equitable Data are uniquely positioned to build this capacity. We encourage consideration of the specific needs and uses for cumulative impact assessments and other evaluation mechanisms, especially as EPA takes steps to finalize the draft guidance on the assessment of environmental justice in agency actions.

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<sup>26</sup>The US Playbook to Address Social Determinants of Health, <https://www.whitehouse.gov/wp-content/uploads/2023/11/SDOH-Playbook-4.pdf> (November 2023).

<sup>27</sup>Initial Proposals for Revising the Federal Race and Ethnicity Standard <https://www.whitehouse.gov/omb/briefing-room/2023/01/26/initial-proposals-for-revising-the-federal-race-and-ethnicity-standards/> (Accessed Dec. 4, 2023).

<sup>28</sup> AAMC Comments to OMB, RE: Initial Proposals for Updating OMB’s Race and Ethnicity Statistical Standards, Docket No. OMB – 2023 – 0001 <https://www.aamc.org/media/66246/download?attachment>.

<sup>29</sup> Supra Note 15.

<sup>30</sup> *Id.*

- **Tools that Support Environmental Justice**

Related to OSTP’s interest in identifying the opportunities for federal decision-making, including the evaluation of tools and environmental justice resources through the White House “Justice 40 Initiative,” is the Administration’s newly launched and first ever government-wide *Environmental Justice Scorecard*, developed to evaluate agency actions on environmental justice and provide public transparency and accountability.<sup>31</sup> While this resource is new, it appears especially useful for helping OSTP measure the progress of the OSTP Subcommittee and particularly how its activities are benefiting communities made marginalized.

Another resource that has received considerable attention is the Administration’s *Climate and Economic Justice Screening Tool* (CEJST) to help the government identify communities that are disproportionately impacted by environmental hazards and allocate financial investments to those communities based on specific risk factors (e.g., flood risk, pollution exposure).<sup>32</sup> There have been concerns among policy-makers, researchers, community-based organizations, environmental justice advocates, and others that the CEJST excludes race and ethnicity data in its algorithm. Concerns have also emphasized that the omission of race and ethnicity provides an inaccurate picture of which communities disproportionately experience environmental harms.<sup>33</sup>

As OSTP points out in the RFI, there might be “examples of data, research, local or Indigenous Knowledge that have been misused or misinterpreted in environmental justice-related decisions and actions” (Q.1f). It is also equally important to examine the tools and resources that support those decisions. We recommend the continued evaluation of CEJST given the outstanding concerns from both users of the tool and the communities impacted by the funding decisions. Related, we would also like to bring to OSTP’s attention an August 2022 letter from the *White House Environmental Justice Advisory Council* expressing concern with the current version (1.0) of CEJST. As stated by the Council: “[t]he CEJST does not include race as an indicator of a disadvantaged community. However, decades of environmental justice research justify the inclusion of structural racism metrics in the tool.”<sup>34</sup> The Council goes on to provide additional examples where structural racism has been and should be used as a metric (i.e., redlining, segregation, foreclosures)<sup>35</sup> and addresses missing metrics such as indicators of Native American and tribal land, income data, among other equity measures.<sup>36</sup>

While we recognize the CEJST is reviewed and updated every year based on public feedback, it is clear that outstanding concerns with Version 1.0 remain unaddressed, increasing the potential for errors, data gaps and disparities in funding allocation. As the White House Council recommended in their August letter, we also reaffirm the need for *additional opportunities* for feedback from environmental justice and health equity experts in addition to the annual public feedback opportunity. Further, we support the Council’s suggestion to increase staff resources that will allow for the development of strategies in partnership with experts, community organizations, as well as the communities that use and/or are directly impacted by CEJST.<sup>37</sup> As discussed further in Section II (*Meaningful Engagement for Communities*), we firmly believe that those closest to historic and contemporary injustice and inequity are also those closest to solutions to that injustice and inequity.

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<sup>31</sup> Environmental Justice Scorecard, <https://ejscorecard.geoplatform.gov/scorecard/> (Accessed Dec. 4, 2023).

<sup>32</sup> White House Justice 40 Initiative, <https://www.whitehouse.gov/environmentaljustice/justice40/> (Accessed Dec. 4, 2023).

<sup>33</sup> <https://apnews.com/article/climate-science-environment-pollution-fe337100f1bb1f5fa86f081af8a3b69f>

<sup>34</sup> White House Environmental Justice Advisory Council, RE: Recommendations for the Climate and Economic Justice Screening Tool, August 2022, [https://www.epa.gov/system/files/documents/2022-08/CEJST%20Recommendations%20Letter%208\\_4\\_2022%20Final.pdf](https://www.epa.gov/system/files/documents/2022-08/CEJST%20Recommendations%20Letter%208_4_2022%20Final.pdf) (Accessed Dec. 4, 2023).

<sup>35</sup> *Id.*

<sup>36</sup> See also, EPA’s EJ Screen which includes “People of Color” as one of the seven socioeconomic indicators featured in the mapping tool, <https://www.epa.gov/ejscreen/overview-socioeconomic-indicators-ejscreen> (Accessed Dec. 5, 2023).

<sup>37</sup> *Supra* Note 25.

Meaningful community engagement will help identify appropriate data sources and strategies to rectify outstanding issues with CEJST.

## II. Encouraging Participatory Science and Meaningful Engagement for Communities

We appreciate that OSTP is interested in “encouraging, implementing, and institutionalizing community and/or participatory science,” and recommend OSTP continue to develop opportunities to respond to the mandate of EO 14096 to “ensure that the public including members of communities with environmental justice concerns has adequate access to information on Federal activities.”<sup>38</sup>

### Bi-Directional Communication

The AAMC and the CHJ have long supported the government’s efforts to increase community participation by establishing effective bi-directional pathways that allow for community wisdom to shape agency decision-making. We agree with OSTP that community engagement should be institutionalized in governmental practices and for engagement to be “meaningful” it should be done in partnership *with* the community, not “for” the community as noted in the RFI and addressed above (Section I, Environmental Justice Principles and Terminology). We recommend the OSTP Subcommittee develop mechanisms that allow for ongoing community feedback across the spectrum of policy and program development – from the formulation of new policies and programs through program implementation and evaluation of those activities using metrics that matter both to the government and to diverse communities. This will also ensure information about the *Environmental Justice Science, Data, and Research Plan* and other agency activities reach all intended communities and are useful to those communities.

One way this might be pursued is through the establishment of a permanent environmental justice community advisory group that would advise the OSTP Subcommittee and Interagency Council on a process for meaningful public engagement, including the use of community-generated data in federal, state, and/or local decision-making. Notably, EO 14096 emphasizes the need to conduct environmental justice activities “*in partnership* with State, Tribal, territorial, and local governments, as well as community organizations, businesses, and members of the Federal government (emphasis added).”<sup>39</sup> The Interagency Council consists of leadership from across the federal government and while this is an impressive group as is, it would behoove the Council to include a community representative from the EPA’s National Environmental Justice Advisory Council and/or the White House Environmental Justice Advisory Council. This would help to keep the Council consistently apprised of important agency-related community engagement activities and achieve one of the Interagency Council’s goals “[...]to increase the meaningful participation of individuals from communities with environmental justice concerns in Federal activities.”<sup>40</sup>

Further, these efforts should be evaluated, iterated, and improved over time. We encourage OSTP to adopt the National Academies’ conceptual model for *Assessing Meaningful Community Engagement* which lays out four domains to assess the impact that authentic, co-equal engagement has on partnerships, programs, policies, and communities.<sup>41</sup> One key aspect of this process includes the definition of what should be measured in meaningful community engagement, not solely what is already being measured. As stated in the related Commentary, “On the premise that society ‘measures what matters most,’ and ‘what is measured gets done,’ the Organizing Committee wanted the conceptual model to focus on the outcomes

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<sup>38</sup> Supra Note 2.

<sup>39</sup> Supra Note 15.

<sup>40</sup> *Id.*

<sup>41</sup> Assessing Meaningful Community Engagement: A Conceptual Model to Advance Health Equity through Transformed Systems for Health, <https://nam.edu/assessing-meaningful-community-engagement-a-conceptual-model-to-advance-health-equity-through-transformed-systems-for-health/> (February 14, 2022).



needed to guide the measures and metrics of meaningful community engagement, not being limited by what already exists in the literature.”<sup>42</sup>

### **Demonstrating and Maintaining Trust**

The OSTP is also interested in learning how to advance respectful and meaningful public engagement. While “respectful,” and “meaningful” are appropriate ways to refer to community engagement, we also encourage the use of the word “trustworthy” as community partnerships are most successful when they are built on trust, respect, and a shared vision. The EPA also shares this sentiment stating in their draft *Meaningful Involvement Policy*, “[m]eaningful involvement is a process used to inform decision-making, enhance EPA’s actions, and build or rebuild trust with the public to achieve health and environmental protection. This process takes time and resources, is nonlinear, and is often iterative.”<sup>43</sup> We wholly agree and hope that OSTP will consider how EPA’s draft policy (once finalized) contributes to and informs OSTP’s goals for meaningful community engagement.

Finally, we would like to highlight the work the CHJ is doing with its Multisector Partner Group and health equity community by guiding organizations and government entities in their efforts to equitably partner with communities and build trust among members of those communities. To achieve this, the CHJ co-created with community members from seven geographies across the U.S., the *Principles of Trustworthiness* and a corresponding toolkit which integrates local perspectives with established precepts for community engagement.<sup>44</sup> In an effort to apply and evaluate these Principles, we recently launched the *Principles of Trustworthiness Toolkit Pilot Project* to award up to five multisector community partnerships with \$30,000 to formally use the Toolkit and contribute to its evaluation over one year. We believe the Principles would serve as a useful resource as the OSTP Subcommittee is developing community engagement strategies as part of the Research Plan. We know that OSTP is familiar with the Principles of Trustworthiness from discussions across the office in the context of pandemic clinical trial readiness<sup>45</sup> and are enthusiastic about helping OSTP achieve meaningful and trustworthy partnerships facilitated by the principles and toolkit.

The AAMC and the CHJ appreciate the opportunity to comment on this important undertaking and applaud OSTP for its thoughtful approach to advancing environmental justice. Achieving climate and environmental equity is about ensuring that all communities have sustainable and equitable opportunity for health and we agree with the Administration’s contention that “wherever people live, play, work, learn, grow, and worship — is a matter of justice and a fundamental duty that the Federal Government must uphold on behalf of all people.”<sup>46</sup> The CHJ has prioritized environmental justice as one of its four mission areas (i.e., trustworthiness, data for health equity, environmental justice, and maternal health equity) and will continue to amplify communities that are disproportionately impacted by climate change and co-develop evidence based solutions to climate health inequities.

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<sup>42</sup> *Id.*

<sup>43</sup> EPA’s Meaningful Involvement Policy, <https://www.epa.gov/system/files/documents/2023-11/achieving-health-and-environmental-protection-through-epas-meaningful-involvement-policy.pdf> (October 2023).

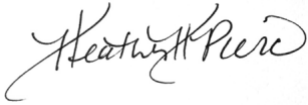
<sup>44</sup> AAMC Center for Health Justice Principles of Trustworthiness, <https://www.aamchealthjustice.org/our-work/trustworthiness/trustworthiness-toolkit>

<sup>45</sup> See AAMC Comments, OSTP Emergency Clinical Trials RFI (Jan. 27, 2023), <https://www.aamc.org/media/64816/download?attachment>

<sup>46</sup> Executive Order on Revitalizing Our Nation’s Commitment to Environmental Justice for All, <https://www.whitehouse.gov/briefing-room/presidential-actions/2023/04/21/executive-order-on-revitalizing-our-nations-commitment-to-environmental-justice-for-all/>.

For questions about these comments or to learn more about our environmental justice activities, please contact either of us or our CHJ colleagues, Daria Grayer, JD, MA, Director of Policy and Regulations (dgrayer@aamc.org) or Anthony Nicome, MHS, Environmental Justice Fellow (anicome@aamc.org).

Sincerely,



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cc: David J. Skorton, MD, President and Chief Executive Officer