

# CATALYSTS FOR RACIALLY EQUITABLE ORGANIZATIONAL CULTURES

A Leadership Development  
Model for People Managers

**Kristell Caballero Saucedo**

National Urban Fellows	Class of 2022
Master of Policy Management	Mccourt School of Public Policy
Georgetown University	Advisor: Theodore R. Johnson, PhD

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## EXECUTIVE SUMMARY

Despite verbal commitments and investments in diversity, equity, and inclusion training, organizations across the United States continue to struggle with creating racially equitable cultures. As a result, Black and Latina employees, in particular, face inequities when it comes to their support and positive experiences with their managers and their sense of belonging.

United States Pharmacopeia (USP), an independent 201-year-old global nonprofit scientific organization, serves as a microcosmic example of the challenges of creating a culture where employees feel a sense of belonging and can equitably thrive and managers can grow their capacity to be truly effective leaders.

This capstone argues that because of their multilateral influence, people managers play an essential role in transforming organizational cultures. They set the tone for the type of culture they would like to uphold by providing direction to groups and individuals, setting norms, and responding and adapting to tension as they arise. Organizations like USP have invested in short-term diversity, equity, and inclusion training to build the cultural capacity of their people managers without any institutional accountability measures. As a result, these strategies have been ineffective at building the leadership practices needed for cultural change.

This paper uses four criteria—political feasibility, administrative capacity, sustainability, and relevance—to evaluate a set of policy solutions focused on supporting cultural capacity-building efforts to promote the leadership development of USP people managers. Based on this analysis, the paper proposes the liberatory consciousness peer learning network as a new model for leadership development—one that is supported by other components of organizational infrastructure—to help leaders to become agents of change. To reinforce their leadership development model, the paper also proposes the development and implementation of a communications strategy, an institutionalized accountability system, and an impact and learning strategy to track changes in organizational change by analyzing USP employee experience.

## INTRODUCTION

Conversations about integrating diversity, equity, inclusion, and belonging (DEIB) — and in some cases, racial equity—in the workplace are occurring with increasing frequency, in public, private and social sectors. The #MeToo movement, along with the racial reckoning after the viral public murder of George Floyd, catalyzed many organizations to begin interrogating institutional policies, practices, and cultures that continue to uphold “kyriarchal<sup>01</sup> mind-sets and structures” (Fiorenza, 2017) that exacerbate existing racial and intersecting inequities (Starner, 2018; Colleta, 2021). While some organizations have been intentional about such interrogations, they continue to struggle with aligning their organizational cultures with values of racial equity. One such organization is the United States Pharmacopeia (USP), an independent 201-year-old global scientific nonprofit “focused on building trust in the supply of safe, quality medicines” (United States Pharmacopeia), whose board and executive leadership have committed to and invested in advancing DEIB within the organization.

To achieve transformation, it is imperative to analyze the way existing organizational systems create inequity and to propose alternative racial equity infrastructures. Racial equity infrastructure is defined by the Council Office of Racial Equity as the “management capacity and organizational infrastructure to enable diverse stakeholders to work toward a shared vision of racial equity” through community building. It centers on stakeholder collaboration and institutional partnerships that engage well-informed communities—particularly people of color and those that are marginalized—in decision-making processes. As a result of its commitment to DEIB, USP has developed a DEIB strategy with five core pillars – governance, accountability & metrics, communications, people processes & systems, and cultural capability building – that resemble elements of a racial equity infrastructure.

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<sup>01</sup> Fiorenza (2001) defines kyriarchy as “a neologism...derived from the Greek words for “lord” or “master” (kyrios) and “to rule or dominate” (archein) which seeks to redefine the analytic category of patriarchy in terms of multiplicative intersecting structures of domination... Kyriarchy is best theorized as a complex pyramidal system of intersecting multiplicative social structures of superordination and subordination, of ruling and oppression.” (Definition summarized by Ferguson, 2014)

All five pillars are important intersecting elements of organizational transformation towards racial equity, and all contribute to the creation of an organizational culture that is equitable in such a way that everyone feels like they belong and can thrive. A major component of culture-building and employee experience is supporting the leadership development of people managers, meaning those who lead personnel as opposed to those who manage operations or systems. To be effective as a culture builder, a leader needs to be able to lead diverse teams equitably and nurture a team culture of belonging.

This capstone focuses on the importance of, and strategies for, building the capacity of people managers to become effective leaders. More specifically, it explores the USP approach as an example of how organizations can build the leadership capacity of people managers to drive organizational cultural change. I argue that training and workshops alone are not enough to support the development of effective leaders who build new cultures of belonging. For organizations to integrate racial equity into their operations, they must be intentional about cultural change. One of the ways they can do this is by supporting people managers in becoming better leaders of their teams through peer-learning networks grounded in a liberatory consciousness framework—a concept devised by professor of Social Justice Education Barbara Love that supports the development of leadership praxis that centers on racial equity (2010). Effectively building the leadership capacity of people managers requires a learning model that combines peer-learning networks (PLN) and Love’s liberatory consciousness framework.

## POLICY PROBLEM

Building the equitable leadership capacity of people managers is elemental in eliminating organizational racial disparities that affect employees' experiences with their teams, promotions to managerial positions, compensation, and the distribution of projects, resources, training, and overall employer support. A 2020 corporate workplace study by Lean In found that although Black women request promotions at the same rate as all men, they are much less likely to get promoted (at a ratio of 58:100). The study also found that managers are not as likely to support their Black women employees as their white women employees and are also less likely to advocate for their professional development and advancement. The report finds that "compared to white women, Black women are less likely to have managers showcase their work, advocate for new opportunities for them, or give them opportunities to manage people and projects. Black women are also less likely to report that their manager helps them navigate organizational politics or balance work and personal life." (Lean In, 2020, p. 9).

This lack of support also extends to Latina professionals. Gomez et al. (2020) reported, despite 52% of Latinas participating in the focus groups in their study expressing a desire to advance to top leadership positions within their fields of work, some Latinas stated that they "felt that their managers made assumptions that they do not want to advance" (p. 12). Latina employees also reported experiencing bias from their supervisors during their performance reviews. In a 2020 study by the Network of Executive Women on Latinas in the workforce, "focus group participants described performance feedback from their non-Latin bosses about things that could be considered cultural traits rather than more tangible things like business performance." (Gomez et al., 2020, p. 9)

This study also found that managers tend to have biased attitudes towards Latina women who might have a regional or Spanish-speaker's accent.

Compared to all men, Black women employees feel less comfortable talking about themselves and their lives outside of work, which ultimately signals an inability of the organization to create a culture of belonging for all employees (Lean In, 2020, p. 14).

Similarly, Allwood & Sherbi (2016) estimated that 76% of Latin Americans in the workplace intentionally repress their authentic self by “covering or downplaying who they are, modifying their appearance, their body language, their communication style, and their leadership presence” (p. 8). This research also showed that 53% of Latinas and 44% of Latinos feel that their companies define “executive presence” as behaviors that conform to traditional white male standards. Moreover, the authors found that 63% of Latin American professionals do not feel welcomed and included, are likely to feel discouraged from sharing their ideas and opinions, and feel like their ideas are neither heard nor valued (Allwood & Sherbi, 2016). In fact, compared to 77% of white women and 76% of all men in the study sample, people of color were less likely to feel a sense of belonging (63%), and women of color were even less likely to feel a sense of belonging in the workplace (50%) (DiTondo, 2020, p. 1).

USP is a microcosm of all the inequitable workplace cultures affecting professionals of color, with Black women and Latinas experiencing the most inequitable treatment. Results from the 2021 USP Engagement & Culture Survey, which was conducted from April 11 to April 25, 2021 with a USP employee participation rate of 92%, showed that compared to their peers, a smaller percentage of Black and Latin American staff working in the US reported a sense of belonging. Compared to an average of 78% overall within the US and 72% globally, among Black and Latin American staff, 61% reported feeling a sense of belonging and 68% reported feeling a sense of belonging. Latinas in the US reported least favorably at only 48% feeling a sense of belonging, while Black women in the US reported feeling a sense of belonging at an average of 65%. The survey results also revealed a disparity in feeling a sense of psychological safety when practicing full authenticity. Black staff reported “being significantly less comfortable sharing experiences and their cultural background with colleagues” with an average of 54% reporting comfort with sharing their experiences compared to 73% of USP staff overall.

## **USP is a microcosm of all the inequitable workplace cultures affecting professionals of color, with Black women and Latinas experiencing the most inequitable treatment.**

Latinas and Black women also had the lowest percentages of favorable responses when asked about their experience with their supervisors<sup>02</sup>, with Latinas landing at 64% and Black women at 74%, compared to an overall USP staff average of 83%<sup>03</sup>. Moreover, Black women and Latinas feel the least empowered to take appropriate risks and initiatives within their units, responding least favorably at 62% and 63% respectively compared to the overall USP staff average of 73%. This trend remains consistent for workload and rewards, where only 41% of Black women and 43% of Latinas responded favorably, demonstrating the importance of intersectionality<sup>04</sup> in the development of an equitable organizational culture that ensures that people managers are equipped to manage equitably and lead effectively. Advancing DEIB within the USP organizational culture would help address the existing racial and gender experiences of Black and Latin American employees and, in particular, Black women and Latinas.

Like USP, many organizations have responded to internal issues of inequity by implementing one-time DEIB training opportunities for their employees without implementing any institutionalized accountability measures. Dobbin and Kalev (2018) find that “two-thirds of human resources specialists report that diversity training does not have positive effects, and several field studies have found no effect of diversity training on women’s or minorities’ careers or on managerial diversity” (p. 49).

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02 Participants were asked to rate their experience by responding to three different statements: “My immediate supervisor gives me feedback and coaching that helps me improve my performance.” “My immediate supervisor treats me with respect and dignity.” “My immediate supervisor does a good job guiding our team through uncertainty and change.”

03 Interestingly, Black men rated highest on this question of all groups in the survey at 90%--7% points above the average for all USP employees.

04 Intersectionality is a term coined by Kimberly Crenshaw (1989) used to describe the way different social problems often overlap and create multiple levels of social injustice experienced by people holding multiple identities based on their standing on the social hierarchies.

In a 2020 workplace survey by Avion Consulting found that only 54% of 400 respondents across all demographic groups, industries, leadership levels, and roles believe that diversity training has positively impacted their workplace (p. 1). Scholars argue that one of the reasons this method is often unable to drive the change desired is that short-term educational interventions are unlikely to change attitudes or behaviors.

DiTondo (2020) agrees, pointing out that most short-term training focuses on helping participants build awareness, and recognize and acknowledge their biases, but falls short of helping them make long-term changes. Additionally, research has found that compulsory participation in such training tends to make employees feel coerced. For these reasons, training on implicit bias and structural discrimination must integrate elements that help participants feel a sense of agency in solving the problem they are being introduced to (Dobbin & Kaley, 2018).

## BACKGROUND

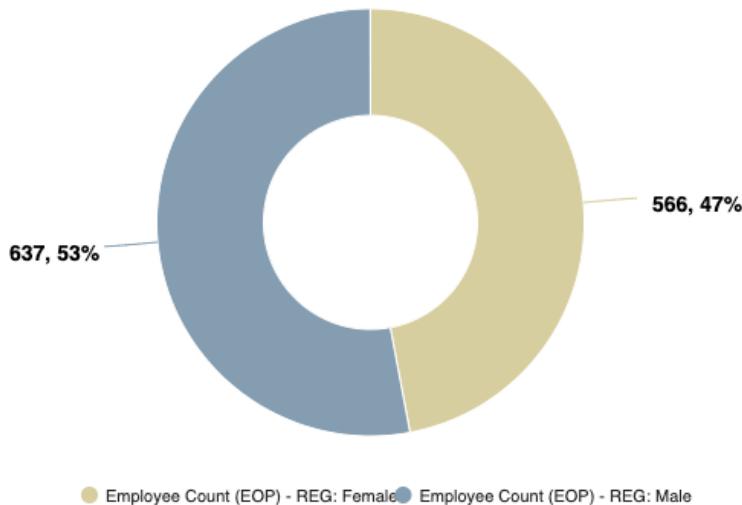
### *Organizational History of USP*

United States Pharmacopeia was founded in 1820 by a small group of concerned physicians worried by the poor-quality medicines available to Americans. The organization contributes to improving public health by publishing medicinal substance and preparation strength and purity standards and providing samples of standard-based formulas to the pharmaceutical sector. In the 1906 federal Pure Food and Drug Act, the United States government “recognized USP standards as official for strength, quality, and purity” (United States Pharmacopeia, 2020) making these standards legal requirements for drugs sold in the US.

A 1994 federal statute extended USP’s influence by setting USP official standards for dietary supplements. In partnership with the United States Agency for International Development, USP increased its influence on the global public health community through its 2000 Drug Quality and Information program, which nine years later evolved into the Promoting the Quality of Medicine program. The latter program was intended to improve medicinal quality by building the capacity of the governments of resource-limited countries to prevent the proliferation of counterfeit and substandard medicines. Since 2005, USP has expanded its presence across the world, opening new laboratories and offices in Latin America, Asia, Europe, and Africa. In 2013, Congress reaffirmed USP’s influence by mandating that the FDA ensure that “a compounder must use bulk drug substances and ingredients that comply with USP standards” (United States Pharmacopeia, 2020).

As of this writing, USP employs 1,203 people and has offices in countries across the world, including the United States, Bangladesh, Brazil, China, Ghana, India, Nepal, Nigeria, Singapore, and Switzerland, among others. However, most of the organization’s employees are based in the United States. USP’s demographic data indicate that women of all racial and ethnic identities represent 47% of USP employees globally. (See Figure 1.)

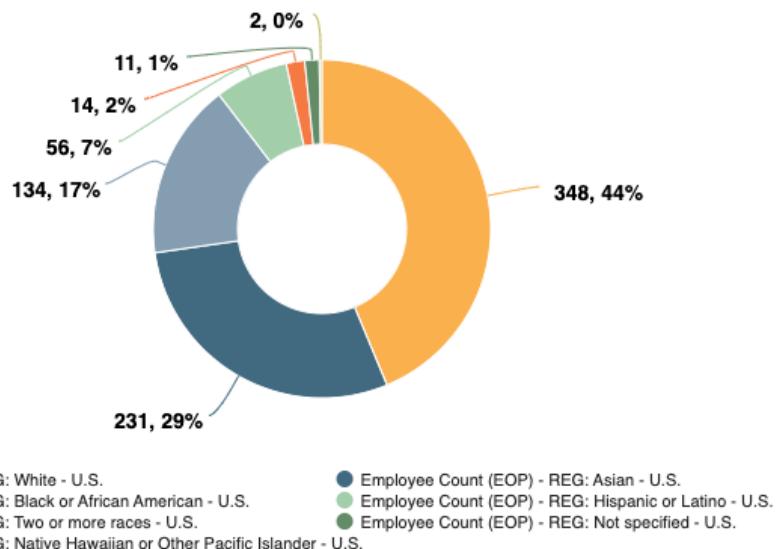
**Figure 1: USP Employee Gender Demographics Worldwide, 2022 (#,%)**



Source: United States Pharmacopeia unpublished internal information

In addition, 17% of USP employees working in the United States identify as Black; 7% identify as Latin American; 29% identify as Asian; 2% identify as being of two or more races; 43% identify as White, and 1% do not specify their racial/ethnic identity. (See Figure 2.)

**Figure 2: USP Employee Race/Ethnicity Demographics Worldwide, 2022 (#,%)**



Source: United States Pharmacopeia unpublished internal information

## *Conceptualizing Racial Equity*

Most practitioners and scholars—like those working at nonprofit organizations such as Race Forward, Center for Assessment and Policy Development, and Open Source Leadership Strategies—agree that “racial equity” is a process and condition in which racial disparities are eliminated and everyone’s outcomes are improved. The term centers on the socio-economic and political experience of racialized groups of people who have historically experienced systemic harm through policies, practices, attitudes, and cultural messages (Center for Assessment and Policy Department) that have resulted in their marginalization, oppression, and exploitation in order to uphold white supremacy (within the kyriarchy).

Internally, USP developed a set of terms to advance its DEIB Strategy—a shared language to be used throughout the work towards organizational change. These terms are defined in Figure 3. Notably, the terms Equity and Ally were added at the insistence of the Chief Equity Officer.

**Figure 3: USP's Definition of Terms**

<b>Diversity is a FACT.</b>	It is comprised of physical, personal and social characteristics, such as gender, race/ethnicity, age, sexual orientation, disability, education, and background, that make people unique and different from one another. It can be MEASURED. (traits and characteristics)
<b>Equity is POLICY.</b>	We ensure through our policies and practices that everyone receives the support they need through removing systemic barriers, such as access to networks, opportunities, resources and influential roles. Equity does not take anything away from any colleague, rather, it allows USP to expand access to all regardless of level, location, demographic dimension etc and focus on full inclusion in order to better achieve our mission.
<b>Inclusion is an ACTION.</b>	It describes a work environment where all individuals are respected for their difference and ensures equitable (given what is needed) access to opportunities and resources that allow full contribution to the organization’s success. (behaviors and social norms to level an uneven playing field)
<b>Belonging is an OUTCOME.</b>	It means employees are heard, encouraged and welcomed to bring their full perspectives and whole selves to the table and engage in a psychologically safe space that acknowledges all unique diverse dimensions and emphasizes equity for all people. (feeling of authentic acceptance)
<b>An Ally is...</b>	A person who uses their power and privilege to lift-up others; a person who acts in solidarity with another who they are allied with.

Source: (United States Pharmacopeia, 2021)

Diversity, within the context of racial equity, is defined as a process that requires organizations to become racially diverse. Here, it is imperative to state that people of color not only live within the context of their racial identity, but also experience the world as multi-dimensional beings who hold a diverse range of physical, personal, and social characteristics even within their own racialized communities. Inclusion and belonging are interconnected elements of racial equity goals as participation in social and political spaces is elemental to human wellbeing. Allyship is a strategic element needed for the advancement of racial equity efforts within institutions. The term is discussed more extensively below in the section on liberatory consciousness.

### ***USP's Racial Equity Journey***

In response to the increased prominence of the #MeToo movement in the public conversation and at the request of the organization's board of trustees, USP included diversity, inclusion, and belonging as a strategic priority before the 2019 fiscal year. Although the organization had previously celebrated new cultural events, it began creating new opportunities to implement its commitment to DIB work and helped staff to learn and engage in this work. This commitment has continued and extended to integrate equity work.

Following the announcement of its strategic commitment to DIB, USP organized an all-staff foundational diversity workshop. Employees created the organization's first affinity group, USP Global Women's Network (UGWN), cultural event celebrations continued, and affinity group events were organized. Since the inception of the first affinity group (AG), the number of these groups has increased as well as the size of their memberships. At this writing, USP has nine AGs. Affinity groups are tasked with identifying the challenges and needs of their members, supporting their members, and creating the conditions necessary to build a sense of belonging.

Between July 2019 and September 2020, USP developed and published a public diversity statement, and the executive team declared their collective and individual commitment to DIB. A consultant was brought in to assess USP's progress in advancing DIB within the organization.

From October through December of 2020, driven by its Human Resources<sup>05</sup> (HR) department, USP added DIB principles to the organization's core values. And for the first time, DIB-related questions were included in the organization's Staff Pulse Survey. The use of demographic data collection expanded and became part of the organization's hiring processes.

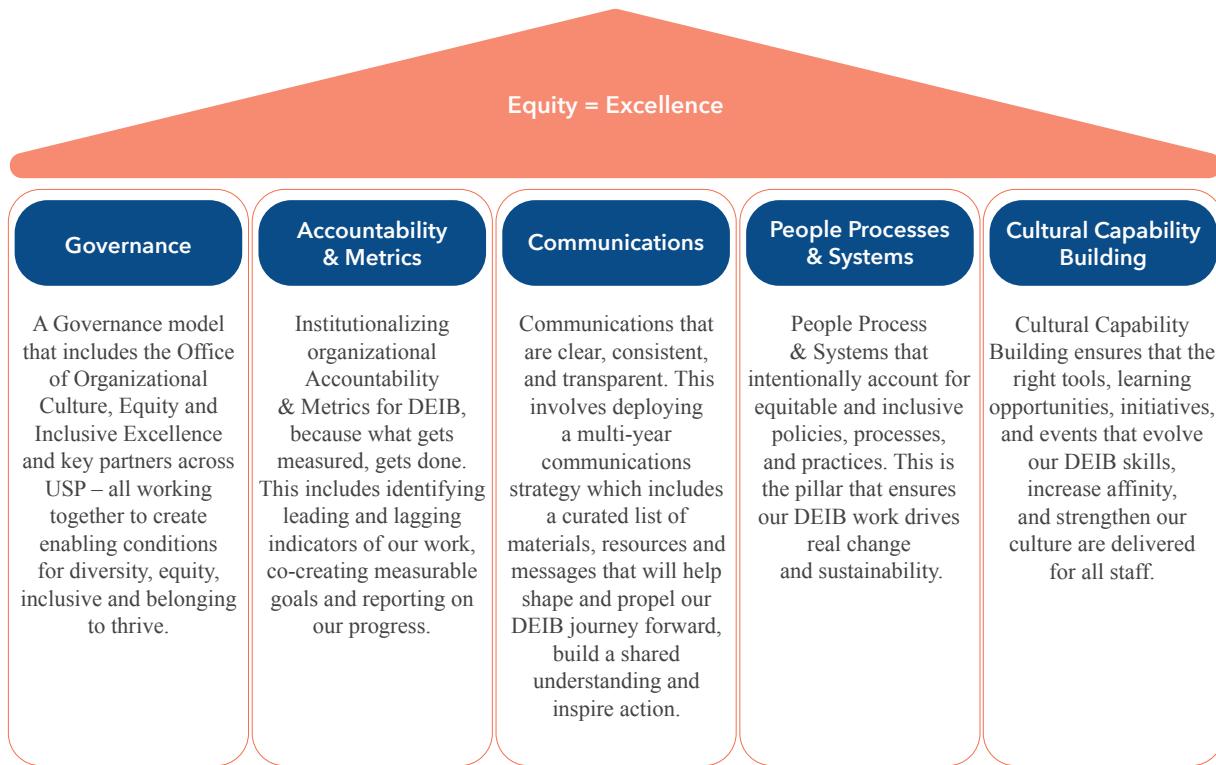
In January 2021, a DIB Council was created through an application process open to all USP staff interested in serving as members. Working in tandem with the AGs, the Council serves as a bridge between the AGs and the Office of Organizational Culture, Equity, and Inclusive Excellence (Equity Office), provides counsel to the strategic work of the Equity Office, and serves as an advocacy group to advance racial equity efforts within teams as well as other departments. As the first members of the DEI Council reach the end of their term in June 2022, the Council is becoming a more established entity within USP. The Equity Office relies on the Council to engage in conversations with different departments requesting to meet with or draw consultants from the Equity Office. Their consistent presence in these and other strategic meetings has helped build the Council's credibility and prominence within the organization.

In the spring of 2021, the Equity Office created a DEIB strategy and road map. Grounded in the principle of Equity=Excellence, USP's Diversity, Equity, Inclusion, and Belonging (DEIB) strategy is composed of five pillars: Governance, Accountability & Metrics, Communications, People Processes & Systems, and Cultural Capability. (See Figure 4.) In particular, the Equity=Excellence principle is rooted in the organization's core passion for quality and commitment to others and aligned with USP's culture of excellence. In June 2021, USP hired its first Chief Equity Officer & Senior Advisor to the CEO to lead the newly created Equity Office.

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<sup>05</sup> The Human Resources department has been renamed the Global People & Culture department. For simplicity purposes, I will refer this department as HR in the rest of the paper.

**Figure 4: USP's DEIB Strategic Framework**



Source: (United States Pharmacopeia, 2021)

The launch and operations of the Equity Office have helped continue the momentum of DEIB work within USP. As a starting point to build the cultural capacity of its employees, USP had already launched two non-compulsory, but highly recommended, diversity and inclusion workshops focused on unconscious bias and “choosing respect” training. These workshops had a 99% employee participation rate. However, the Equity Office has advanced training by developing learning and engagement opportunities focused on racial equity.

In addition, in a 21-Day racial equity pilot challenge that ran between January 18, 2022, and February 16, 2022, 146 employee participants learned and reflected on racial equity topics. On January 3, 2022, and February 2, 2022, the Equity Office facilitated an interactive webinar focused on engaging in conversations about race where more than 400 USP staff participated globally. At the time of this writing, 176 of USP’s 328 people managers have enrolled to participate in a 21-Day Equitable Leadership Challenge, which launched on March 14, 2022.

and is focused on building awareness and equitable practices of people managers. These learning opportunities have helped USP employees build intrapersonal awareness and analysis of what it takes to be a racial equity advocate and an ally to their peers with marginalized identities. The opportunities have also helped build the conditions necessary for people managers to move towards the development of a praxis that is grounded in intersectional racial equity.

As part of USP's 2025 Impact Strategy, a Success Sharing Plan (SSP) was developed, and one of its primary goals is to attract and retain mission-committed talent through strengthened flexibility, inclusivity, and people management fundamentals. To support his goal, in 2021, USP's CEO publicly announced the executive team's decision to create two new mandates to be included as part of employees' annual strategic goals: the DEIB goal and a people-oriented goal for people managers. As a result, by the end of the 2022 fiscal year (June 30, 2022), all USP employees are expected to have accomplished at least one DEIB-focused goal, which will be considered during their annual performance review. The Equity Office can leverage this newly developed mandate to incentivize people managers to engage in leadership development programming that is grounded in racial equity. For the most part, staff across divisions have submitted DEIB goals (See Figure 5), which could include participating in DEIB-focused programming, engaging with or being an active member of one of the Affinity Groups, or strategic integration of DEIB into their work.

**Figure 5: Staff that submitted DEIB Goals (%) by Division**

Division	% of Staff Goal Plans that Include DEIB Goals
Digital & Innovation	100%
Global External Affairs	88%
Global Health & Manufacturing Services	54%
Global Science & Standards	85%
Legal, Strategy & People	85%
Operations	72%
Regions & Program Operations	75%

*Source: Internal USP HR Analytics*

On February 28, 2022, USP announced the launch of the Great People Manager (GPM) Ecosystem, which is a compilation of different management and leadership development programs, practices, and policies developed by HR in partnership with the Equity Office and the Employee Relations teams to support people managers. To attract, retain, and develop USP talent, the GPM hopes to provide the training, tools, and resources needed to develop five key competencies: 1) accountability and assessment, 2) continuous improvement, 3) nimble and adaptive leadership, 4) inclusive management, and 5) coaching fellowship. (See Appendix A.) The Equity Office is currently tasked with serving as a consultant to the Learning, Strategy & Organizational Transformation team which will develop content for the GPM Ecosystem. More specifically, the Equity Office is supporting the integration of DEIB perspectives into the learning content being developed. However, within the GPM context, the Equity Office is primarily responsible for creating learning opportunities focused on building the inclusive management competency of people managers. As the leading entity for the promotion of the fourth competency of the GPM Ecosystem (i.e. inclusive management), the Equity Office enjoys complete autonomy in developing the content, approach, and direction of the learning opportunities being developed.

## LITERATURE REVIEW

### *Why People Managers?*

Institutions committed to integrating values of racial equity into their institutional policies, practices, and culture are often challenged by the complexities of this work. Racial equity requires not only an interrogation of systems but also an analysis of the interpersonal and intrapersonal beliefs and behaviors of individuals living intersectional lives. Wasserman et al. (2008, p. 178) observe that organizational leaders play a key role in “holding and communicating” these complexities of racial equity work in ways that allow for all members of the organization to understand.

Organizational leaders are elemental to the design and development of systems, facilitate “unified meta-narratives that support the vision of an inclusive culture,” and enable clarity on an intentional process and structure of engagement (Wasserman et al., 2008, p.178). This role is especially important during times of resistance against the racial equity values required for organizational change. Wasserman et al. (2008, p. 178) call for engagement with pushback, a process of “dancing with resistance” as it is recognized and embraced as an opportunity to identify key lessons instead of something to be suppressed.

Referencing previous literature, especially Heifetz & Laurie (1997), Wasserman et al. (2008, p. 179) stress the need for leaders of organizations implementing transformation to develop skills that help them “create the conditions to mobilize groups and individuals, provide direction, protection, and orientation, manage conflict, and shape norms.” As leaders of teams within their organization, people managers need to have these leadership skills enabling them to be responsive and adaptive to tensions that might arise because of the nuanced reality of racial equity transformative work.

Harter (2019) argues that managers often experience unhappiness and lack of motivation, and report that they feel more stress and burnout than members of their teams. In addition, they often receive management development training that does not equip them with the right tools to effectively support their teams. Harter contends that repositioning how companies support the

development of their managers by grounding their development as coaches on their values and talents is a key component in changing culture by developing people managers.

### ***Peer Learning Networks***

Backer (2018) explores the benefits and best practices of peer networking by examining 19 peer networks in the social sector, thirteen of which were facilitated by its funding partner Annie E. Casey Foundation. Backer (p. 3) defines peer networking as “a problem-solving and decision-making approach built on interaction, both structured and informal, among two or more people defined as ‘equals’ by their similar goals and interests, job roles or place in a community.”

Backer’s study references Peters & Waterman (1987) to articulate the need for simultaneous loose-tight properties for effective peer networking. Curators of these networks must balance structure and informality to “promote continuity and follow-through” but allow flexibility for the organic cross-pollination and interrogation that move ideas forward (p. 19). The author further explains that peer networks are places where people can engage in the cross-pollination of ideas, dissemination of good practices, and the development of leadership structures focused on collaborative problem-solving. Such networks, they say, also inspire participants to innovate transformative ideas through conversations that reinforce the need to expand the bounds of critical thinking. Albeit focused on educators, Poortman & Brown (2018) similarly describe peer learning networks (PLN) as “any group who engage in collaborative learning” (p. 5) with individuals outside the communities they are usually part of, like their communities of practice.

In a review of literature on the development of peer learning from 1981 to 2006, Topping (2007) argues that peer learning fundamentally requires multi-directional communication between participants and the learning facilitator and involves conflict and challenge as in the development and interrogation of ideas. As a result, they claim, peer learning networks enhance communication and social skills that ultimately improve the self-esteem of participants (p. 635).

In a study focused on online asynchronous learning networks, Hiltz (1998) identifies multiple disadvantages to remote collaborative learning. The “social presence” of remote

peers and learning facilitators does not feel as strong as networks do in person. Additional disadvantages include limited bandwidth and participants' inability to know the next time they will be able to receive reactions or feedback. In a remote learning environment, the social isolation from peers also makes it difficult for participants to remain engaged and motivated. Retaining engagement and motivation of people managers is critical because competing priorities, including their work and supervisory responsibilities, might lead to their de-prioritization of the network and learning content. Nonetheless, Hiltz (1998) argues that collaborative learning methods, where participants can engage in idea and information sharing as well as sharing feelings and experiences, are effective for online peer learning.

### ***Liberatory Consciousness***

To advance racial equity values that get us to change the systems and cultures that create racial disparities requires the development of praxis for allyship. Often, it is challenging for leaders to develop this praxis because of the complexities that arise from leading teams including people holding a multiplicity of identities. To overcome this problem, Love (2010, p. 601) offers “liberatory consciousness” as a model that “[e]nables humans to live their lives in oppressive systems and institutions with awareness and intentionality, rather than on the basis of the socialization to which they have been subjected.”

Love’s liberatory consciousness model offers four key components that attempt to dismantle inequitable systems: awareness, analysis, action, and accountability. Building awareness and is fundamental to building a praxis because it requires building our capacity to, with intentionality, observe and build our consciousness of “our language, our behaviors, and even our thoughts” (Love, 2010, p. 602). Engaging in continuous analysis of the world individuals live in and how they are engaging with the existing inequitable systems requires individuals to build their capacity to theorize the what and the why of what is happening in their lives and the world, and to reflect on what needs to be done in response. The component of action requires acting on the solutions individuals have considered during the analysis process. The accountability (and allyship) component is necessary for the multidimensional coalition

and alliance building that occurs within and across different identity groups (Thompson, 2008, p. 328; Catalano, 2015, p. 429). Catalano (2015, p. 419) explains that the liberatory consciousness framework gets us “beyond virtual equality,” and moves us away from existing us vs. them, oppressor vs. oppressed binary models of allyship by recognizing the existence of intersectionality.

Further exploring the role of people managers in creating organizational cultures that embrace racial equity, Wasserman et al. (2008, p. 180) note that creating an organizational culture of inclusion requires developing leadership with “a new set of leadership qualities and skills including flexibility, fluidity, self-awareness and mindfulness, courage, and the capacity to be vulnerable in a powerful way.” These elements are present in the development of a liberatory consciousness because such a consciousness requires individuals to engage in continuous identification and interrogation of systemic inequitable structures while developing an analysis of how they engage in these systems and what role they play in dismantling them. Liberatory consciousness also requires mindfulness, courage to confront the way individuals contribute to these systems, and courage not only to act but to engage in multidimensional modes of accountability.

**Black and Latina women at USP would greatly benefit from an intentional effort to shift USP's organizational culture that it is grounded squarely on values of racial equity.**

## STAKEHOLDERS

Employees and leaders alike are impacted by the absence of an organizational culture grounded in racial equity values. Though impacted differently by the existing organizational culture, the majority of USP employees have a positive outlook on DEIB work and its capacity to drive USP to achieve its mission. In the 2021 USP Engagement & Culture Survey, 85% of participants responded, “highly favorable” to the statement “I feel that Diversity, Inclusion, and Belonging will help us drive continued growth toward fulfilling USP’s mission.”

Moreover, existing learning opportunities have shown that USP employees are seeking opportunities to learn with and from their peers by engaging in group discussions. In fact, in a recent 21-day challenge feedback survey, 55% of respondents said that they would like to engage in group discussions. This request for opportunities to have conversations with peers is consistent with surveys conducted during recent trainings on unconscious bias and choosing respect. Other peer-learning activities like the book club established by the affinity group for Black employees have succeeded in building participants’ “learning edge and notions on race and privilege.” According to the 2021 Book Club survey, 97% of respondents who participated in the club felt that their participation in this peer learning opportunity was impactful on their learning and understanding. Forty-seven percent of respondents felt that their colleagues and fellow-club participants helped build their awareness and broaden perspectives on racial inequities. These responses show that USP employees appreciate peer-learning opportunities that would help build their abilities to engage in conversations and actions that lead to more equitable organizational conditions.

However, the 2021 USP Engagement & Culture Survey also showed gender disparities in

employee experience across USP locations worldwide, and racial and gender disparities within the United States<sup>06</sup>. And while 82% of USP employees “believe USP is taking the right steps to create a diverse and inclusive environment” (2021 USP Engagement & Culture Survey Results, 2021), employees have had different experiences within the organization.

### ***Black and Latina Employees at USP***

The 2021 USP Engagement & Culture Survey results illuminate existing inequities in employee experience across gender and race—trends admittedly that exist in organizations across the United States. Like other Black women and Latina professionals in the workforce, Black women and Latinas at USP are more impacted than other employees as a result of an inequitable organizational culture and lack of equitable leadership. Not only are they less likely to feel supported by their managers, but, according to Carr et al. (2009), they also are less likely to feel like they belong in the workplace. Such feelings, in turn, can impact their job performance, their connection with their work, and their commitment to the organization. The lack of a racially equitable organizational culture can also drive employee turnover. Glassdoor’s 2020 workplace survey of job seekers and employees found that compared to 38% of white respondents, 47% of Black and 49% of Latin American respondents reported they had previously left an organization after witnessing or experiencing discrimination at work. Importantly, because this is a universal problem across organizations in the United States, meaning that Black and Latina women at USP would find themselves in a difficult predicament if or when they decided to leave.

Therefore, Black and Latina women at USP would greatly benefit from an intentional effort to shift USP’s organizational culture that it is grounded squarely on values of racial equity. The development of equitable people managers would significantly impact their experience because it would transform the existing relationships with their managers, their teams, and the organization.

That said, a peculiarity revealed by the 2021 USP Engagement & Culture Survey is that even though Latinas would benefit from the development of a culture with racially equitable

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<sup>06</sup> Note that the 2021 USP Engagement & Culture Survey did not collect race/ethnicity data outside of the United States

values, the group responded the least favorably to the questions of whether DEIB would help USP drive continued growth toward fulfilling its organizational mission. Only 65% of Latinas responded favorably compared to a USP overall rate of 85%. It is unclear what lies behind his result, which is against the respondents' best interests as they are one of the groups most impacted by the experiential disparities enabled by the existing culture.

### ***Leaders at USP***

#### **People Managers**

As previously discussed, people managers set the tone for the cultures developed by the teams they manage. As leaders, people managers are tasked with ensuring effective and high-quality work from their teams. Creating an equitable and inclusive workplace is in the best interest of people managers because, according to research conducted by Cloverpop (2017, p. 7), “[h]ighly diverse teams were twice as likely to make better choices and meet or exceed expectations.” Cloverpop’s study found that diverse and inclusive teams (teams with members who differ in gender, age, and ethnicity/race) make better and faster decisions. According to Cloverpop, diverse teams with inclusive practices make better business decisions and twice as fast up to 87% of the time.

#### **Executive Team**

USP’s executive team (ET) is composed of seven members: the CEO, the Executive Vice President, and four Senior Vice Presidents. Ultimately, the ET’s interest is to ensure that the organization achieves its mission “to improve global health through public standards and related programs that help ensure the quality, safety, and benefit of medicines and foods.” A 2018 McKinsey study found that the integration of DEIB values gives organizations a competitive advantage. According to McKinsey, balanced binary gender diversity alone makes organizations 21% more likely to outperform their peer organizations. Moreover, organizations with ethnic and racial diversity are 33% more likely to outperform their peer organizations. Informed by these findings, USP’s ET recognizes that to reach the organization’s goals, USP must develop the conditions that would allow for its employees to create quality work, as well as enable the

organization to acquire and retain the best talent in the labor market. As organizational leaders that are also people managers, the ET is also responsible for leading the cultural change required for them to achieve organizational success.

As noted, building a racially equitable organizational culture is also about remaining competitive in the job market. According to recent employee surveys (Glassdoor, 2020; Monster, 2020; Flood, 2016), for Millennials and Gen Zers organizational values of diversity, equity and inclusion are important factors when deciding where they want to work. According to a 2020 workforce survey conducted by Monster, 57% of Millennials and 83% of Gen Z job seekers stated that these values are important when selecting what organization to work for. Moreover, in a Glassdoor (2020) study, 37% of employees and job seekers stated that they would not apply to a company “where there are disparities in employee satisfaction ratings among different ethnic/racial groups.” The numbers were higher when disaggregated by race and ethnicity with 41% of Black, 33% of Asian, 32% of Latin American, and 30% of white respondents expressing this sentiment. Finally, a PWC 2016 survey found that 86% of female professionals and 74% of male professionals seek employers with diversity and inclusion strategies.

## PROPOSED POLICY OPTIONS

As the leader of DEIB efforts within USP, the Equity Office can advance the sustainability and resilience of the organization's racial equity work, transforming USP into a workplace where all employees, but most importantly Black and Latinas feel seen, heard, and empowered. This will require the Equity Office to create the conditions for people managers to serve as agents of cultural change grounded in values of racial equity. The following paragraphs suggest three policy recommendations that could support people managers in that effort.

### ***Policy Option #1: Continue Implementing Traditional Learning Models***

The continuation of traditional learning models as a method to advance racial equity within USP by focusing on building the cultural capability of people managers is threefold:

The Equity Office would continue leveraging its role as a consultant to the Learning, Strategy & Organizational Transformation team to support the integration of racial equity perspectives into the existing content of the organization's manager training curriculum and additional content being developed. Its role as an influencer would rely on the willingness of the Learning, Strategy & Organizational Transformation team to integrate racial equity values and content into programming.

The office would also continue leveraging its role as lead for the inclusive management style competency of the GPM Ecosystem, to develop people managers, using previous programming methodologies like the webinars, workshops, and traditional 21 daily challenges. These will be one-time and short-term opportunities focused on building the awareness and analytic capacity of people managers in relation to equitable leadership, with the hope that these managers commit to and practice equitable behaviors that lead to cultural change.

Lastly, apart from the GPM programming, the Equity Office would continue developing racial equity-focused learning opportunities like the webinars, workshops, and 21 daily challenges.

### ***Policy Option #2: Reliance on Individual Commitment to Learning and Transformation***

As part of the Great People Management Ecosystem programming, the Equity Office would take the lead in launching the liberatory consciousness peer-learning network as an optional learning opportunity available to all people managers. Relying on program marketing, the Equity Office would partner with the USP communications team to promote and recruit network participants. Behavioral change within USP would also depend on self and peer-to-peer accountability within the network, with the objective that people managers develop new leadership behaviors and expand their leadership edge to integrate racial equity. This option would depend on people managers' commitment to their learning and transformation since it is an optional opportunity without institutional accountability measures.

Under this policy, the Equity Office would also continue in its role as a consultant to the Learning, Strategy & Organizational Transformation team for GPM Ecosystem programming work. It will also continue in its role as curator of racial equity-focused learning opportunities available to all USP staff.

### ***Policy Option #3: Mutually Reinforcing Pillars of the Racial Equity Infrastructure***

Relying on all pillars of the racial equity infrastructure as part of this policy option, the Equity Office would assume the roles of advocate, consultant, and implementer. I have divided each component of this option in a way that is specific to each racial equity infrastructure pillar:

#### **Cultural Capability Building**

The Equity Office would develop and implement a liberatory consciousness peer-learning network curriculum for people managers, as well as continue to develop all-staff racial equity learning opportunities and serving as a consultant to the Learning, Strategy & Organizational Transformation team for GPM Ecosystem programming work. The Equity Office would also continue in its role as curator of racial equity-focused learning opportunities available to all USP staff to help build their interpersonal skills.

## **Governance**

The Equity Office would leverage existing support from the ET to gain financial and public support to implement the network. It would request a 5-year funding commitment from USP identifying this funding guarantee as a key component of its strategic goals. In addition, the ET would help promote and actively participate in the liberatory consciousness peer-learning network, to ensure that the ET will support policy changes that include changes in annual performance reviews to include assessments of team culture and aggregate employee experience as a basis of institutional accountability.

## **Accountability & Metrics**

The Equity Office would leverage existing relationships with the People Technology & Analytics Department and existing evaluation methods to develop evaluation strategies focused on measures of cultural change. Short- and mid-term cultural changes could be measured using the Weekly Pulse Survey. Measure, while long-term cultural changes could be assed using USP's Annual Culture Survey. Both measurement strategies would require analysis of results pre- and post-curriculum implementation.

## **Communications**

The Equity Office would leverage its own funding and partnership with the communications team to develop a communications strategy that reinforces the importance of building equitable leadership, the expectation that people managers would build equitable team cultures where all people thrive, and the organizational goal is to foster a culture of belonging for all—particularly for Black and Latina women.

## **People Processes & Systems**

The Equity Office would partner with and serve as a consultant to the HR team to update annual performance reviews for people managers. Performance reviews would include assessments of team culture and aggregate employee experience as a foundation of institutional accountability.

## CRITERIA

To conduct a comparative assessment of the three policy options, I use four criteria.

The criteria have been weighted based on the level of importance as it relates to addressing the policy problem.

1. Political feasibility: estimates the level of support each option is likely to receive from multiple stakeholders. This criterion is weighted at 20% as stakeholder support is needed to ensure engagement of the target audience (i.e. people managers), but it is also helpful for creating social and institutional pressures to ensure high participation. The weight of this criteria also takes into consideration the existing landscape at USP, which includes existing support and engagement in racial equity efforts.
2. Administrative capacity: to achieve the necessary organizational change. Such capacity requires the investment of time, knowledge and skills, funds, and technical expertise. This criterion has been weighted at 15% as administrative capacity is elemental to the implementation of the policy options. However, capacity alone is not what helps determine whether a policy can help address the policy problem.
3. Sustainability: takes account of the fact that staff and leadership changes are part of organizational life cycles. For this reason, to ensure sustainability, a criterion focusing on the long-term financial, technical, and staff commitment is required. This criterion has been weighted at 15% as it measures whether the policy option can be sustained in the long term to achieve organizational transformation.
4. Relevance: estimates the policy option's ability to build an organizational culture, grounded in racial equity with an intersectional perspective by developing racially equitable people managers. Ultimately, this criterion tries to determine whether the policy option will address the existing organizational culture that contributes to the inequitable outcomes previously discussed. This criterion is weighted the highest at 50%, being that it evaluates the options' ability to achieve the USP's strategic goal to attract and retain mission-committed talent by addressing the existing policy problem.

The following section provides a detailed description of the key components of the four criteria identified. I have developed a matrix to rate each option based on its score for each criterion. Scores range from 1 to 6. Thus, for political feasibility and relevance, the continuum is as follows: emerging with a scaling range of 1-2, growing with a scaling range of 3-4, and advanced with a scaling range of 5-6. Emerging signals low levels of commitment to supporting racial equity work. Growing signals that an organization has some level of commitment to racial equity work. And advance signals a strong and active commitment to racial equity work.

For the criteria on relevance, the continuum relates to the different stages of change where the advanced stage signals a more complex understanding of racial equity; and for behavioral change the advanced stage signals the successful completion of the individualized praxis of people managers. For administrative capacity and sustainability, the continuum ranges as follows: emerging with a scaling range of 5-6, growing with a scaling range of 3-4, and advancing with a scaling range of 1-2. The focus here is on the level of financial and personnel investment required, which increases as the organizational commitment to racial equity is more advanced. The following tables disaggregate the four general criteria into their main components.



## Political Feasibility

Division	Emerging (1-2)	Growing (3-4)	Advanced (5-6)
<b>Leadership Support</b>	Only a few members of the executive team support the policy option. The policy option is not approved for implementation.	The CEO and some members of the ET fully support the policy option. The policy option is approved and implemented. Some ET members help promote and participate in policy option programming.	All members of the ET fully support the policy option. The policy option is approved and implemented. ET members help promote and participate in policy option programming.
<b>Staff (non-people managers)</b>	Only a few staff support the policy option. Very few staff advocate for the policy option.	Up to 50% of staff support the policy option. Many of them advocate for the policy option.	The majority of the organization's staff support the policy option. A significant number of USP staff advocate for the policy option.
<b>People Managers</b>	Only a few people managers support the policy option. Low-level engagement during the development and/or implementation processes. Very few people managers serve as advocates for the policy option.	Up to 50% of people managers support the policy option. Mid-level engagement during the development and/or implementation processes. Multiple people managers serve as advocates for the policy option.	The majority of the organization's people managers support the policy option. High-level engagement during the development and/or implementation processes. A significant number of people managers serve as advocates for the policy option.
<b>Support of relevant organization departments</b>	The policy option has little to no support from relevant departments (e.g. HR, leadership development, and evaluation) needed for its implementation.	The policy option has support from some relevant departments needed for its implementation.	The policy option has full support from all relevant departments needed for its implementation.

## Administrative Capacity

Criteria	Emerging (5-6)	Growing (3-4)	Advanced (1-2)
<b>Cost</b>	The policy option requires an investment that is, for the most part, considered low-cost.	The policy option requires mid-level investment	The policy option requires a significant level of investment.
<b>Staff Time/Expertise</b>	Although the implementation of the option does not require a significant level of expertise, it requires an intermediate level of understanding of DEIB or racial equity. Implementation can rely on volunteer staff time.	Policy option implementation requires an investment of relevant skills but not relevant experience. It also requires mid-level staff time.	High-level of relevant expertise and experience is required for the successful implementation of the policy option. Allocation of significant staff time is required.
<b>Technical Support</b>	Implementation of the policy option requires low levels of technical support for communications, evaluation, and IT.	Implementation of the policy option relies on mid-levels of significant technical support for communications, evaluation, and IT.	Implementation of the policy option requires significant technical support for communications, evaluation, and IT.

## Sustainability

Criteria	Emerging (5-6)	Growing (3-4)	Advanced (1-2)
<b>Cost</b>	The policy option requires minimal levels of long-term investment to upkeep its implementation.	The policy option requires some financial investment to sustain its implementation.	The policy option requires significant levels of investment to sustain its implementation.
<b>Staff Time/ Expertise</b>	Long-term, the policy option requires minimal staff capacity to implement. Implementation does not require a significant level of expertise; though it requires an intermediate level of understanding of DEIB or racial equity. Implementation can rely on volunteer staff.	Long-term, policy implementation still requires relevant skills but not relevant experience; it requires mid-levels of staff capacity.	Long-term, the policy option requires high-level staff time and expertise for the continuation of the offerings under the policy.
<b>Technical Support</b>	Long-term implementation of the policy option requires low levels of technical support for communications, evaluation, and IT.	In the long-term, implementation of the policy option relies on mid-levels of technical support for communications, evaluation, and IT.	Significant technical support for communications, evaluation, and IT continues to be a requirement in the long-term for the implementation of the policy option.

## Relevance

Division	Emerging (1-2)	Growing (3-4)	Advanced (5-6)
Builds cultural capability in a racial equity context that is intersectional	The policy option offers a framing grounded in diversity, equity, inclusion, and belonging.	The policy option offers a racial equity framing that is limited to race and racism.	The policy option provides racial equity framing that considers intersectional identities within the kyriarchy.
Behavioral change of people managers	The policy option helps people managers build awareness and analysis and provides tools for action, but there is no significant change in leadership practices.	The policy option supports people managers in developing an individualized racially equitable plan with interpersonal and intrapersonal accountability. However, only some people managers have fully integrated these elements into their daily practice.	The policy option supports people managers in developing an individualized racially equitable plan with interpersonal and intrapersonal accountability measures. Most people managers have fully integrated these elements into their daily practice.

## ANALYSIS OF POLICY OPTIONS

This section analyzes the three policy options on the basis of the four evaluation criteria. Using the criteria weights previously discussed and average scores criterion using the subcriteria scores, I calculate the final scores of each option to provide a comparative analysis of the three options.

### Policy Option #1: Continue Implementing Traditional Learning Models

Criteria	Score	Explanation
<b>Political Feasability</b>		
<b>Leadership Support</b>	4	While ET support might be high pre and during implementation, the option's inability to address the existing problem and lead to cultural organizational change (by leveraging people managers) would result in a decrease of support in the long run.
<b>Staff (non-people managers)</b>	4	Support from staff would be high at the beginning, but the policy option's inability to create significant long-term cultural change would lead to a reduction of support.
<b>People Managers</b>	6	Without the pressure to commit or institutional accountability, people managers are more likely to support a policy that does not require them to participate in learning opportunities outside of their existing responsibilities. Participation in programming under this policy does not require significant levels of time commitment. In addition, people managers will not be penalized for not changing their behaviors and leadership style.
<b>Support of Relevant Organization Departments</b>	6	This option does not require any change in the existing relationships with relevant departments.
<b>Administrative Capacity</b>		
<b>Cost</b>	4	Some additional spending would be required for the implementation of this option to complete the existing offerings catalog of the Equity Office. This might include hiring external consultants for the development and implementation phases.
<b>Staff Time/Expertise</b>	4	Existing learning models would require staff time and relevant skills for the development of new content for the programming, although very technical expertise and experience might not be necessary.
<b>Technical Support</b>	4	The implementation of the option requires some level of communications and technology support.
<b>Sustainability</b>		
<b>Cost</b>	5	Costs would decline in the long-term as a result of the completion of the programming. But the option would require consistent updates.

<b>Staff Time/Expertise</b>	4	Staff time would decrease in the long run, but relevant skills would be required during the process of sustainment of the programming content.
<b>Technical Support</b>	5	The option would reduce the level of support for communications and technology for the implementation of the option as existing communications and technologies can be recycled.
<b>Relevance</b>		
<b>Builds cultural capability through a racial equity context that is intersectional</b>	3	Existing content integrates racial equity, but also provides DEIB-related content.
<b>Behavioral change of people managers</b>	1	Although this option provides learning opportunities and resources for people managers, it doesn't provide the conditions necessary to build a praxis. There will be a slight change in behaviors but not significant enough to influence organizational change. Traditional learning models have not significantly improved organizational culture.

## Policy Option #2: Reliance on Individual Commitment to Learning and Transformation

Criteria	Score	Explanation
<b>Political Feasibility</b>		
<b>Leadership Support</b>	5	ET support will be high during the implementation of the policy option, but a slight decrease might occur because of slow progress toward achieving USP's strategic goal to attract and retain mission-committed talent.
<b>Staff (<i>non-people managers</i>)</b>	4	This option would have staff support during initial implementation, but support would decrease over time as a result of slow progress toward achieving cultural change.
<b>People Managers</b>	4	Without the pressure to commit or institutional accountability, people managers are more likely to support a policy that does not require them to participate in learning opportunities outside of their existing responsibilities. This option requires a considerable time commitment from people managers participating in the peer learning model. In addition, people managers will be penalized for not changing their behaviors and leadership style.
<b>Support of Relevant Organization Departments</b>	6	This option does not require any change in the existing relationships with relevant departments.
<b>Administrative Capacity</b>		
<b>Cost</b>	3	Mid-level investment would be required for staff time in addition to resources needed to implement appropriate technologies for virtual learning platforms and communications.
<b>Staff Time/Expertise</b>	2	Highly skilled staff required for the development and implementation of the model, including the curation of the content and facilitation of network conversations.

<b>Technical Support</b>	2	A moderate level of technical support from communications and IT experts would be needed for the promotion of the programming and creation of a virtual platform for remote learning.
<b>Sustainability</b>		
<b>Cost</b>	4	Although this option's cost would be lower than during the initial implementation, moderate levels of investment would be needed to maintain and continuous implementation of this option.
<b>Staff Time/Expertise</b>	2	Although staff time needs might decrease in the long-term, expertise would still be needed for the continuous implementation and update of content.
<b>Technical Support</b>	4	A moderate level of support is needed from IT and communications staff for the implementation of this policy option; specifically, for the marketing and virtual platform for remote learning.
<b>Relevance</b>		
<b>Builds cultural capability through a racial equity context that is intersectional</b>	6	This option is grounded in the liberatory consciousness framework which builds a praxis to actively dismantle the kyriarchy.
<b>Behavioral change of people managers</b>	3	This option would help many people managers to develop an individualized racially equitable plan with interpersonal and intrapersonal accountability measures. However, only some people managers would have fully integrated these elements into their daily practice. There are no institutional measures of accountability or other reinforcements that serve as incentives for behavioral change.

### Policy Option #3: Mutually Reinforcing Pillars of the Racial Equity Infrastructure

Criteria	Score	Explanation
<b>Political Feasibility</b>		
<b>Leadership Support</b>	4	ET support might not be as strong because they are people managers, but their commitment to solving existing organizational challenges creates some support from the ET.
<b>Staff (<i>non-people managers</i>)</b>	6	This option would likely receive the majority of staff support because it would drive cultural change and they could provide feedback about their manager's performance.
<b>People Managers</b>	2	Although some people managers would support the implementation of the cultural capability portion of this policy option, the majority would likely oppose it because of institutional accountability.
<b>Support of Relevant Organization Departments</b>	4	HR support might become less favorable because the policy requires investments of time and expertise from their team to make a policy change on performance reviews. There would be no change in the existing support from departments leading evaluation and leadership development since the policy option requires no additional commitment from them.
<b>Administrative Capacity</b>		

<b>Cost</b>	1	The option calls for high levels of investment to cover the time and staff capacity of all staff involved. In addition, resources will be needed to acquire and employ appropriate technologies for virtual learning platforms and communications resources.
<b>Staff Time/Expertise</b>	1	Highly skilled staff will be required for the development and implementation of the model, including the curation of the content and facilitation of network conversations. Significant HR time will also be required for the partnership with the Equity Office to develop the new performance review for people managers.
<b>Technical Support</b>	1	High level of support from IT and communications for the implementation of this policy option. Specifically, for the marketing, communications strategy building, and virtual platform for remote learning. Evaluation support is needed for the implementation of cultural data analysis and reporting.
<b>Sustainability</b>		
<b>Cost</b>	3	Although cost would be lower over time than at initial implementation, moderate levels of investment would be needed to maintain and implement the policy option programming and evaluation on an ongoing basis.
<b>Staff Time/Expertise</b>	2	Although staff time needed might decline in the long-term, expertise would still be needed for the continuous implementation and maintenance of content.
<b>Technical Support</b>	3	Although not as significant as at the initial launch, moderate level of long-term support from IT and communications for this option's implementation; specifically, for the marketing, communications strategy building, and the creation of a virtual platform for remote learning. The most significant support would be for the consistent short-, mid-and long-term evaluation support needed for the implementation of culture data analysis and reporting.
<b>Relevance</b>		
<b>Builds cultural capability through a racial equity context that is intersectional</b>	6	This option is grounded in the liberatory consciousness framework which builds a praxis to actively dismantle the kyriarchy.
<b>Behavioral change of people managers</b>	6	This option would help most people managers to develop an individualized racially equitable plan with interpersonal and intrapersonal accountability measures. Most people managers have fully integrated these elements into their daily practice as they have institutional measures of accountability that serve as incentives for behavioral change. In addition, consistent messaging to people managers and to the organization helps reinforce the value of the work.

## Comparative Analysis of Policy Options

Policy Options	Political Feasibility Weighted Average	Administrative Capacity Weighted Average	Sustainability Weighted Average	Relevance Weighted Average	Total Average Weighted Score
<b>Option #1</b>	5x.20=.1	4x.15=.6	4.6x.15=.69	2x.50=1	3.29
<b>Option #2</b>	4.75x.20=.95	2.67x.15=.40	3.33x.15=.50	4.5x.50=2.25	4.1
<b>Option #3</b>	4x.20=.8	1x.15=.15	2.67x.15=.40	6x.50=3	4.36

## RECOMMENDED APPROACH

USP's existing landscape gives the Equity Office many options to advance racial equity within the organization. However, the benefits and tradeoffs require a deep interrogation of these options that provides a clear understanding of the organization's goal. Option #3 is the option that scored the max points on the criteria of relevance, meaning that the policy would help most in addressing the core policy problem at hand: the inequitable experience of Black and Latina employees within USP.

Too often, organizations state a commitment toward advancing DEIB within the organization but rely on traditional learning models like workshops and one-time training opportunities that have been ineffective in transforming organizational cultures (Dobbin & Kalev, 2018). Option #3 offers an alternative model for building cultural capability by focusing on helping people managers build a liberatory consciousness while relying on a network of peers to cross-pollinate ideas and expand their understanding of how to apply an intersectional racial equity approach to leading and managing a team. While option #2 offers a similar learning model, it fails to build the institutional systems of accountability that would motivate people managers to change their behaviors. Also, unlike option #2, option #3 includes a comprehensive communications strategy that would serve as a reinforcing mechanism to illuminate the importance of the network in achieving USP's strategic goals. However, the development of strategic communications and advocacy for performance review changes to executive leadership and HR partners require additional administrative capacity.

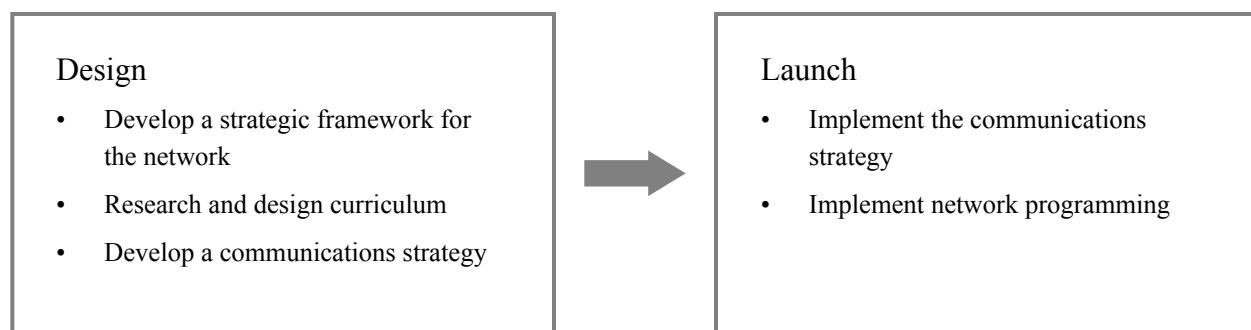
Despite scoring the lowest on political feasibility, option #3 offers peer-to-peer accountability and institutional accountability measures that would serve as incentives for behavioral change among people managers. This, in turn, would result in a change of culture within the different teams and departments at USP. Since people managers are found at multiple levels in the organizational hierarchy because it is grounded in principles of intersectional racial equity, the network will be able to influence organizational change multi-directionally.

Compared to options #1 and #2, option #3 requires more administrative capacity and sustainability because of the differences in time and expertise they require. Organizations often rely on the volunteer time of employees of color, or HR employees who often lack racial equity expertise and experience to expand the cultural capability of their employees (Nance-Nash, 2020; Miller, 2020). This leads to employee burnout among employees of color (Titareid, 2020). Fisher (2012) argues that people engaging in personal change experience different transitions in the process. He calls this set of experiences the “transition curve”. (See Appendix B.) Skilled facilitation that makes personal transitions feel “as effective and painless” as possible is necessary for successful behavioral change. For these reasons, hiring a lead for this work is important as the work requires time, expertise, and experience to be able to curate the appropriate content and facilitate conversations that will lead to behavioral change. While both policy options require expertise, option #3 requires higher levels of administrative capacity required to support people managers navigate through this transition curve to develop a leadership style that is grounded in intersectional racial equity.

## IMPLEMENTATION

Considering the multiple elements of option #3, the design and implementation processes would be divided into short-term, ongoing, and mid-term timelines. The design phase will focus on identifying strategies, timelines, and design as well as building the appropriate teams and/or partnerships. The phase of the launch process would focus on applying the strategies developed during the design phase. The evaluation phase would focus on leveraging lessons from the application of strategies and analyzing the impact of the policy, measuring the change in organizational culture through employee experience.

### *Short-Term Work*



### **Design**

Leveraging existing funds and its role as an inclusive management programming developer within the GPM Ecosystem, the Equity Office would focus on developing a strategic framework for the liberatory consciousness peer learning network that includes the design and launch of programming and a communications plan and the design of an evaluation strategy. To begin, the Equity Office would hire a lead to develop a strategic framework and identify a timeline and cadence of curriculum engagement. The lead would then research related content and design the curriculum. This curriculum would help people managers understand how the kyriarchy shows up in the workplace and share practices that can serve to dismantle these inequities. The lead would also research existing and affordable technologies and platforms accessible and familiar to USP employees that can be used to implement the curriculum.

In partnership with the Equity Office, the lead would also develop an application process, which would include the creation of a set of scoring criteria, an online application, and a detailed scoring rubric to select the number of participants for the first network cohort.

The Equity Office and its communications partners would build a communications strategy focusing on promoting the liberatory consciousness peer learning network by reinforcing messaging regarding the importance of building an equitable leadership, and the expectation that people managers will build equitable team cultures as part of USP's strategic goals. This communications plan would connect USP's strategic goals and support the narrative that racial equity work is not a stand-alone component, but an integral part of the organization's goals and framework. A set of communications talking points would be developed to provide advocates and the ET with strategic language that helps support the Equity Office's efforts to build racially equitable leaders. The ET-specific talking points would signal their engagement and support for the peer learning network and encourage other people managers to engage by leading by example. The Equity Office would engage with other departments in the organization to ensure that this messaging is also integrated into other communications.

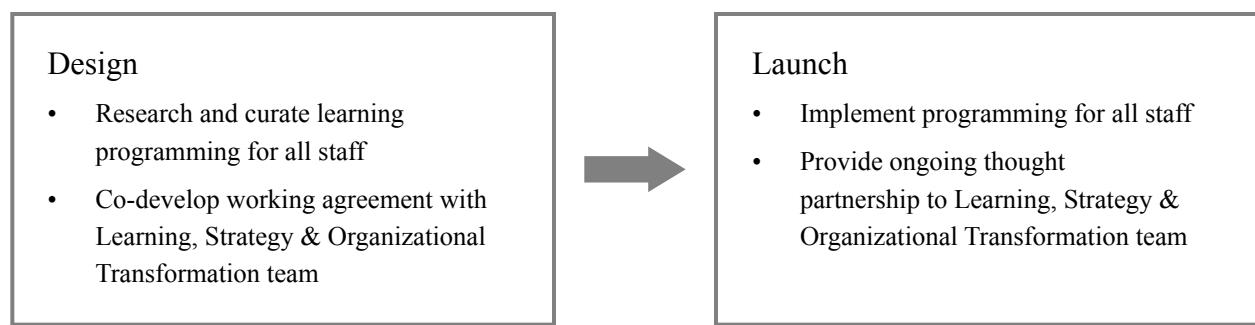
## **Launch**

Upon completion, the communications strategy would be rolled out to begin promoting the liberatory consciousness peer learning network. The Equity Office would provide talking points to other departments and advocates of the work, including the ET, the Affinity Group, and DIB Council members, as well as to any other USP employees who have reached out to support the work of the Equity Office. Once the application for the network participants closes, the lead and Equity Office team would review the applications and select the members of the first cohort. A week or two before launching the peer learning network, the Equity Office would notify the members of the cohort. This process would repeat for each new network cohort as the evaluation process illuminates changes required for the work.

The first cohort of the peer learning network would be launched by the lead starting with an onboarding session to provide detailed information about the network process and platform.

The curriculum would focus on building the awareness of participants by providing content focused on existing policies and practices that lead to inequities, and on actions that can be taken to end these inequities. The content would be paired with reflective questions related to the topic for that week to support the development of capacity for interpersonal, intrapersonal, and systemic analysis by people managers. The lead would provide a template to network participants to help them develop an individualized racially equitable leadership action plan that focuses on the integration of what they are learning into their daily practice. For peer-to-peer accountability, the lead would facilitate biweekly meetings over five months where network members would discuss their experiences in building awareness, and the successes and tensions experienced with the application of new behaviors.

### ***Ongoing Work***



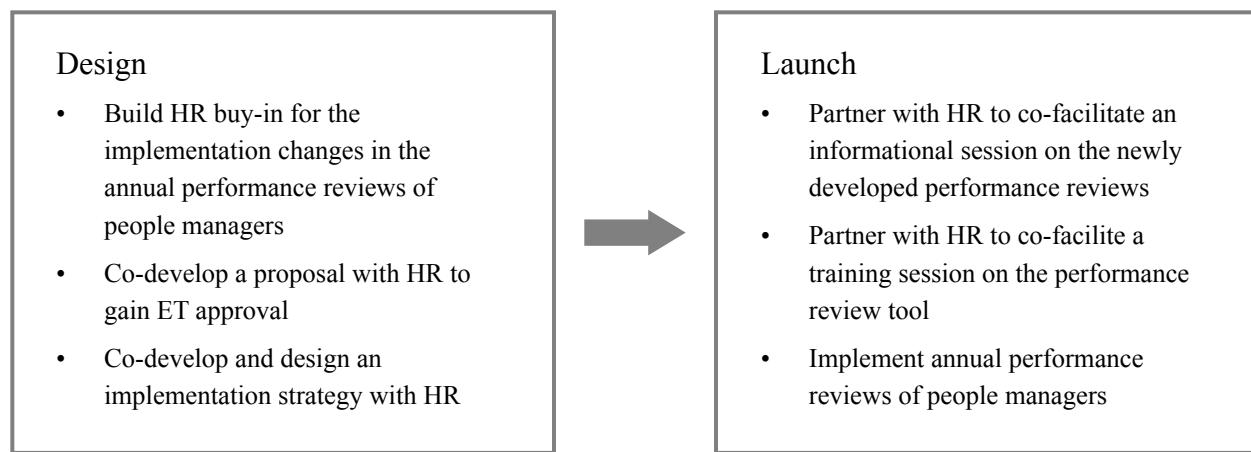
### **Design**

To continue the existing all-staff programming that has been curated and developed by the Equity Office, the existing team would, design a learning strategy with clear priorities and themes for each year to help guide these content design processes. The Equity Office would then research, and curate different learning opportunities focused on building the interpersonal and intrapersonal skills of all USP staff. In addition, the Equity Office would continue serving as a consultant to the content curators of the Learning, Strategy & Organizational Transformation team. This would require the Equity Office to co-develop a working agreement that clarifies the scope of the consultancy partnership.

## **Launch**

The Equity Office continues implementing all-staff DEIB learning opportunities throughout the year, which would serve as additional learning opportunities for people managers that can be integrated into what they are learning throughout their engagement in the network. In addition, an Equity Office representative would engage in ongoing consulting meetings with the content curators of the Learning, Strategy & Organizational Transformation team.

## ***Mid-Term Work***



## **Design**

The Equity Office would focus on institutionalizing methods of accountability.

Implementing changes in the annual performance reviews of people managers would require buy-in from the HR Department and approval from the USP Executive Team. However, before engaging the Executive Team, the Equity Office would engage in strategic conversations with HR to introduce the proposed update to the annual performance reviews of people managers as a method of aligning the work of the Equity Office, HR, and the strategic goals of USP to create a culture of belonging. While the Equity Office would provide insights regarding equitable practices, the HR team would lead the conversations with knowledge of the HR practices and legality. Upon agreement, HR and the Equity Office would design a people manager performance review strategy to present as a proposal to the Executive Team. Once approved by the ET,

HR would work in partnership with the Equity Office to design an implementation strategy for the new performance review that includes communicating the changes to people managers and training them to be able to effectively use the new performance review tool.

## **Launch**

In two to three years, the HR-Equity Office partnership would launch the annual performance review of the people managers strategy by convening an informational session and later facilitating a training session on the tool. This partnership would also facilitate a train-the-trainer session for HR VPs so that they are able to support people managers utilizing this performance review system.

## ***Policy Evaluation***

The evaluation process for this policy would be two-fold: programming evaluation and impact evaluation. To evaluate the curriculum design and content of the liberatory consciousness peer learning network, the Equity Office would design: (i) a pre-participation survey focused on the existing understanding, knowledge, and practices of people managers participating in the network; (ii) a mid-term review of the programming and learning, content, and platforms used during the curriculum implementation; and (iii) a post-participation survey that includes questions regarding the knowledge and practices of people managers participating in the network as well as their overall experience with the format, content, and platforms used. Resulting lessons would be used as needed to update the format, content, and platforms. This evaluation strategy would be repeated for every new cohort. The Equity Office would also develop an evaluation survey for all-staff learning opportunities that would be administered following the completion of each activity. For the impact evaluation, the Equity Office would engage in design conversations with the People Technology & Analytics department to develop an evaluation strategy that leverages the existing Weekly Pulse Survey and USP's Annual Culture Survey.

On an ongoing basis, the Equity Office would review the post-programming feedback for the all-staff learning sessions to help inform future programming. Periodically, the Equity Office and lead would partner to evaluate the liberatory consciousness peer learning network. This

process would begin by collecting data before the launch of the curriculum when the participants would be asked by the lead to complete the pre-network survey. The mid-program survey would be implemented two weeks before the mid-time mark so that the analysis of the results could be used to shift the curriculum to meet the needs of participants. With the support of the Equity Office, the lead would be responsible for adjusting the curriculum. A few days after the closing of the curriculum, the post-participation survey would be implemented and later analyzed by the Equity Office and lead. The findings would then be used to inform the strategic framework for the next cohort.

Every month, the Equity Office would analyze the Weekly Pulse Survey data to identify any changes in the employees' experience of feeling a sense of belonging, and a feeling of fairness, as well as their feelings about improving relationships with their manager pre- and post-launch of the network. At the close of the 2023 fiscal year (June 2023), the Equity Office would partner with the People Technology & Analytics Department to launch USP's Annual Culture Survey. A comparative analysis of earlier survey results and the 2023 data would focus on identifying trends in employee experience with their managers and their overall sense of belonging. A particular focus would be placed on the experience of USP employees of color, in particular Black women, and Latinas. This analysis would assess the effectiveness of the network in changing USP's organizational culture to become more racially equitable.

After the 2023 USP's Annual Culture Survey results are analyzed, the Equity Office and the Learning, Strategy & Organizational Transformation teams would assess the impact evaluation tools. The partnership would focus on what information is missing, whether the surveys are asking the right questions to evaluate cultural change; and the effectiveness of the monitoring framework, including whether it is the right monitoring framework to track cultural change, and how often, when, and how much data should be collected. In addition, the partnership would assess whether the data being collected is giving the Equity Office enough information, and whether it USP should adjust framework implementation.

## CONCLUSION

Employee experience data that continues to illuminate the insidious behavioral patterns of inequity have been normalized by existing organizational cultures in the U.S. workplaces. As a result, despite the many verbal DEIB commitments and financial investments in one-time DEIB workshops and training made by organizations across the country, Black women and Latina professionals continue to be harmed by the existing inequitable cultures exhibited by people managers. USP is an example of an organization committed to creating a culture of belonging that is equitable. But it has struggled to identify an effective method to get to equitable outcomes. People managers are elemental to influencing cultural change within an organization, as they set the tone for normalizing day-to-day practices and behaviors at work.

This capstone offers a strategy that leverages people managers as agents of change to catalyze cultural transformation grounded in racial equity values. Building the organizational infrastructure needed to reinforce a liberatory consciousness peer learning network, would facilitate behavioral change, enabling people managers to lead the way to build teams and organizations grounded in racial equity, and in which Black women and Latina employees are able to thrive. Building an institutionalized method of accountability, establishing evaluation methods to measure change, and creating a communications strategy to reinforce the importance of racially equitable leaders is elemental to the success of this leadership development model.

As job seekers become more diverse and the market becomes more competitive, building racially equitable organizational cultures, with people managers equipped to lead equitably, becomes more of a necessity. Like never before, significant, and long-term investment in racial equity strategies is a matter of organizational survival as Millennials and Gen Zers become the largest workforce in the US. For this reason, this investment must be strategic in equipping and leveraging people managers to lead cultural change within their organizations.

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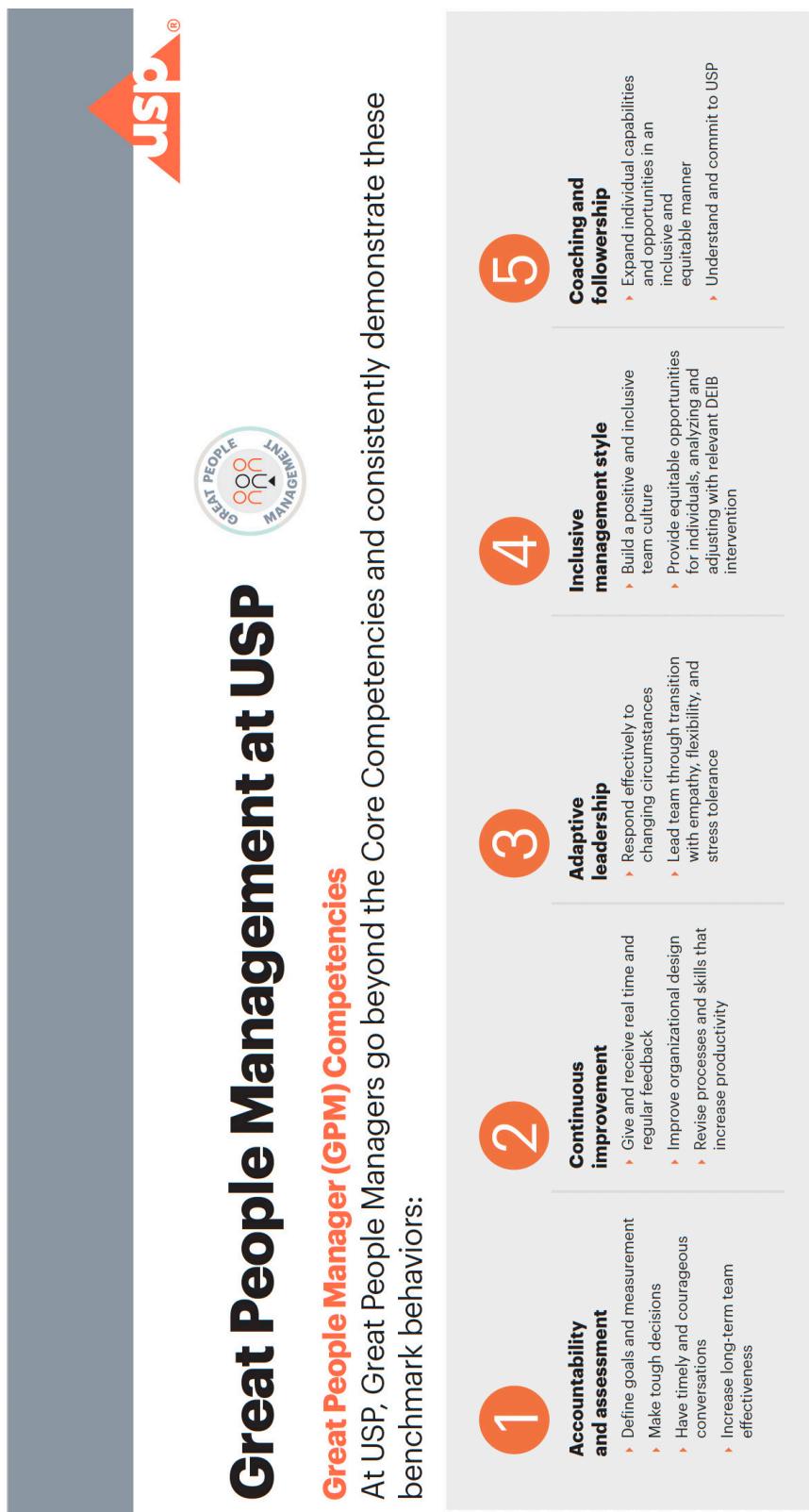
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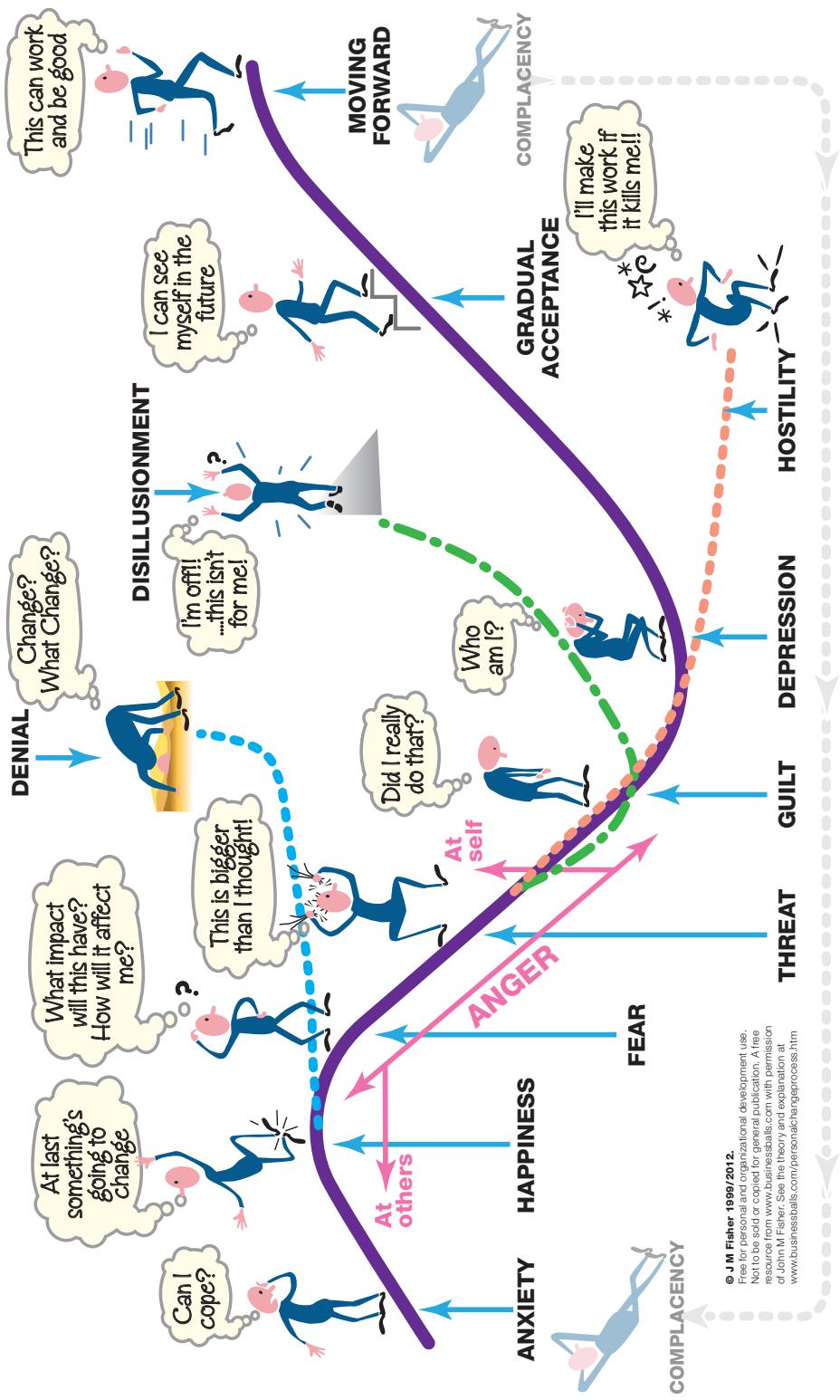
## APPENDICES

### Appendix A



## Appendix B

### The Process of Transition - John Fisher, 2012 (Fisher's Personal Transition Curve)



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