



July 2, 2021

Ms. Shalanda Young  
Acting Director  
Office of Management and Budget  
Executive Office of the President

Dear Ms. Young:

Nemours Children's Health (Nemours) thanks you for your leadership in advancing equity in our nation and for the bold vision set forth in Executive Order (EO) 13985. We believe real change will require a "whole of government" approach that prioritizes equity, collaboration, and the lived experiences of children, youth, and families. Following are: 1) responses to the required components of the Request for Information (RFI), 2) responses to specific questions in the RFI, and 3) a proposal that builds from the questions.

#### **Required RFI Components**

- Respondent: Nemours Children's Health (Nemours)
- Focal Area: RFI Section 5
- Nemours Mission and Expertise: Nemours is one of the nation's largest multistate pediatric health systems, including two free-standing children's hospitals and a network of nearly 80 primary and specialty care practices across five states. Nemours seeks to transform the health of children by adopting a holistic health model that utilizes innovative, safe, and high quality care, while also caring for the health of the whole child beyond medicine.
- Contact for Questions: Daniella Gratale, [Daniella.gratale@nemours.org](mailto:Daniella.gratale@nemours.org), 202-425-5805

#### **Responses to Selected RFI Questions from Section 5**

As stated in the introduction of this RFI, "*Our country faces converging economic, health, and climate crises that have exposed and exacerbated inequities, while a historic movement for justice has highlighted the unbearable human costs of systemic racism.*" Disparities within racial, gender, sexual orientation, disability and other categories exist in numerous areas of life. Decades of research demonstrate that substantially reducing disparities requires a multi-generational approach. Starting in the early years of a child's life and even preconception, provides substantive opportunities to build a foundation of strong health, education, and economic outcomes for future generations.<sup>1</sup> As the Office of Management and Budget (OMB) begins assessing current agency policies and actions, we strongly support efforts to center equity and engage underserved populations, including children, youth and families, to deepen our understanding of the challenges communities face and develop effective policy responses.

Evidence shows that factors like trauma and stress in a mother's life prior to conception, during pregnancy, and throughout the early postnatal care period can impact the life course of her child.<sup>2</sup> Such negative impacts on a child's health can result from both severe but also more moderate levels of stress and trauma on the mother.<sup>3</sup> Other research shows how the preconception diet of a mother, her lifestyle and health behaviors, and the overall health of both parents can all have long-lasting impacts on a child's health and well-being.<sup>4</sup> The father's health at preconception can also have a significant impact on a child's health in areas including preterm birth, low birth weight, and stays in the neonatal intensive care unit.<sup>5</sup>

Early childhood and adolescence are also critical times of development when one's lived experiences can have long-lasting effects on lifelong health and wellbeing. Evidence on adverse childhood experiences – such as domestic violence, parent mental illness or having an incarcerated family member – are strong indicators of poor adult health, health risk behaviors, and even chronic diseases.<sup>6,7</sup> Studies show that Black and low-income individuals were far more likely to report adverse childhood experiences compared to White or higher-income individuals – partially explaining the significant adult health disparities that exist between these groups.<sup>8,9</sup>

Even without accounting for specific adverse events, poverty alone is associated with negative outcomes. Children raised in low-income households are more likely to have poorer neurocognitive outcomes, less educational attainment and lower economic productivity in adulthood – all in turn contributing to the repeated potential for intergenerational poverty.<sup>10</sup> Children who live in the most economically disadvantaged counties in America die at rates up to five times those of their peers in the same state. The same children are three times more likely to lack regular access to healthy food and are 14 times more likely to drop out of high school. In addition, teen pregnancy rates are up to 26 times higher in these counties.<sup>11</sup>

This collection of research indicates that those who have faced challenges in their lives are more likely to not only experience negative health outcomes themselves, but also raise children who will start their lives already at a disadvantage. If effectively implemented and designed in consultation with those they intend to serve, numerous policy approaches starting during pre-conception, continuing through childbirth, and into the early years can substantially reduce disparities. Policy solutions and strategies must target cyclical and intergenerational disparities that persist – especially because the same communities have disproportionately experienced the negative impacts of the COVID-19 pandemic.<sup>12</sup>

The responses below provide recommendations for how the federal government can engage children, youth, and families in this critical process and maximize the impact of EO 13985.

***Q1: What processes should agencies have in place to engage proactively with the underserved individuals and communities that will be most affected by agency programs, policies, rules, processes, or operations? How can agencies design and implement community engagement practices that are accessible to underserved communities? How might affected communities be engaged pro-actively and early to shape agency policy priorities and strategies?***

It is important for the federal government, or any entity that seeks to engage with underserved communities, to prepare before beginning outreach. Equity Impact Assessments (EIAs) are a tool to conduct systemic evaluations of how a policy, decision or action will affect specific groups of

individuals. The Annie E. Casey Foundation (AECF) has developed a Race Equity and Inclusion Action Guide with the goal “to provide key audiences with transferrable insights and tools that can help them understand what steps to take to make sure they are creating equitable opportunities for the populations they serve.”<sup>13</sup>

The guide outlines seven steps: 1.) establish an understanding of race equity and inclusion principles; 2.) engage affected populations and stakeholders; 3.) gather and analyze disaggregated data; 4.) conduct systems analysis of root causes of inequities; 5.) identify strategies and target resources to address root causes of inequities; 6.) conduct race equity impact assessment for all policies and decision making; and 7.) continuously evaluate effectiveness and adapt strategies. The guide contains numerous questions and additional areas for exploration under each step. Completing this process will allow federal agencies to better understand the individuals they seek to engage and prepare them to do so. While the AECF guide specifically describes best practices for race-related issues, the approaches can apply to a variety of areas related to equity and discrimination.

In addition, agencies should consider implementing child impact assessments. The Kids Impact Initiative includes [recommendations](#) for implementation of child impact assessments, including considerations around the impact of proposed policies on equity and the inclusion of the youth perspective. The material includes both national and international examples.

Agencies can also utilize a variety of strategies to engage with, and incorporate the lived experiences of, individuals within the communities they hope to serve. For example, [this resource](#) titled, *Lived Experience: The Practice of Engagement in Policy*, highlights how a comprehensive approach to community engagement must include outreach, consultation, collaboration and shared leadership with community members. Cultivating relationships with community members and including them in decision-making processes is of the utmost importance in policy change for many reasons, especially because survey data will not entirely capture a community’s specific needs. In particular, agencies can develop partnerships with community-based organizations to conduct focus groups and interviews with community members to understand the interests of a community.

***Q2: What tools and best practices might agencies deploy to establish advisory boards, task forces, and commissions that are inclusive of underserved communities?***

In support of the RFI’s statement, “*Our Nation deserves an ambitious whole-of-government equity agenda that matches the scale of the opportunities and challenges that we face,*” Nemours and other partners have explored how to elevate the voices and needs of children and youth across the country. We urge the Biden Administration to launch a White House Office on Children and Youth and a federal children’s cabinet, which states and local governments have effectively used to improve equity and drive policy change.<sup>14</sup> The White House should supplement both of these structures with one or more Family and Youth Advisory Boards and include diverse representation. Below is a full description of this proposal.

In addition, we urge the Executive Branch to launch family councils or advisory boards within each major human services agency of the federal government. Understanding the experiences of families, parents, guardians and caregivers through such councils will result in more effective

policies and public support. Such boards should be diverse and inclusive and include membership from federal program beneficiaries served by the program implemented by each agency. Ascend at the Aspen Institute outlines best practices from their extensive experience piloting family councils and advisory roles within state government.<sup>15</sup> The councils typically involve up to 20 members who have lived experience with the relevant policy issue, especially those from groups that have faced historical inequities. Members of these councils should receive compensation ahead of the meetings for their time, travel and other expenses so they do not have to fund these costs upfront. Meetings should also be held at times when members can attend.

Government officials should also seek to understand and address other barriers to involvement. These barriers may include lack of access to transportation to in-person meetings, lack of internet access for virtual meetings, a need for childcare during meetings, a need for interpretation services during meetings, timing of the meetings, or other factors. It will be critical to identify barriers through direct engagement with youth and families, and to make a focused effort to work with partners inside and outside of government to find innovative solutions to address them.

### **Proposal**

Building on the information and concepts presented above, we submit the following proposal for your consideration in order to achieve a coordinated government-wide strategy focused on equity, beginning in the earliest years of life. In alignment with EO 13985, we recommend establishment of the following:

- 1) A senior leadership position in the White House specifically focused on children and youth
- 2) A Federal Children's Cabinet to implement cross-agency collaboration and center our efforts on equity, elimination of child poverty and racial justice
- 3) A National Child and Youth Advisory Board
- 4) A White House Conference on Children and Youth
- 5) A federal framework for child and family outcomes

### **White House Leadership Structure**

**We urge the establishment of a designated leader and structure within the Domestic Policy Council (DPC) to serve as the nexus for all policies, investments and public-private partnerships impacting children and youth.** This could be achieved through a White House Office on Children and Youth or a new Special Assistant for Children and Youth.

A White House Office on Children and Youth or Special Assistant directly reporting to the President or Vice President, and supported by a Children's Cabinet would serve as a single leadership structure to drive an agenda and comprehensive strategy for children and youth from cradle to career – one that is steeped in equity. Such a structure could set forth a cross-department vision, measurable goals, a coordinated budget and policy agenda for children and youth with a focus on advancing racial and economic justice and equity to ensure all children can enter pre-school, k-12, college, and adulthood healthy, thriving, and ready to learn. In addition to these critical steps, the Office and Children's Cabinet could also support effective implementation in practice through community engagement. For example, they could issue

guidance, provide technical assistance, disseminate best practices, and implement waivers to federal awardees regarding how to legally share data across sectors, blend and braid funds, and make it easier for children, youth and families to access federal programs that serve them after receiving substantive feedback from community members.

### Federal Children's Cabinet

**A Federal Children's Cabinet would work in tandem with a White House Office on Children and Youth to foster alignment of investments and implementation of policies affecting children, youth and their families and to address immediate challenges stemming from the pandemic.** This new structure would align and more effectively coordinate the federal response to major issues such as the youth mental health crisis, rebuilding the childcare sector, and eliminating child poverty. Together with the White House Office on Children and Youth, the Cabinet would ensure that the unique needs of children and youth are a major consideration throughout the development of new policies and legislation, with a focus on advancing equity.

Children's cabinets and similar coordinating entities have been effective at the state and local level. For example, [Virginia's improvements](#) in school attendance, school suspensions, student nutrition and school accreditation help to promote equity. Indiana's Commission on Improving the Status of Children developed and is implementing a cross-agency [Guide for Equity Consideration](#) to identify and help address unintended consequences of policies, practices, and decisions and to incorporate the voices of those most impacted by decisions being made on behalf of Indiana's children. Equity has also been a focus for local-level children's cabinets such as in [Hamilton County, Tennessee](#) where the Cabinet galvanized cross-sector responses to holistic needs, from meals to computers and internet access to mental health supports to childcare to learning hubs for school-aged youth.

A White House Office on Children and Youth and Children's Cabinet would address the cross-sector needs of children and youth as we emerge from the pandemic. It would help to rebuild from economic declines that have exacerbated poverty in our nation, could ensure that the principles of equity impact assessments are considered, and would promote long-term equity.

### National Youth and Family Advisory Board

Youth have powerful lived experiences and insights that policy often fails to account for. A whole of government approach to equity demands that we create mechanisms for amplifying their voices and perspectives to inform federal policy. We recommend the establishment of a National Family and Youth Advisory Board consisting of young people and families. The Advisory Board would review federal policy on an ongoing basis, drawing best practices from existing boards at the state and local level and would engage with the Cabinet and Office.

Examples from the State and Local level can be found from the [Minneapolis Youth Congress](#) to the [New Orleans Youth Advisory Board](#), from the [Maryland Youth Advisory Council](#) to the [Maine Young People's Caucus](#) to the [State of Iowa Youth Advisory Council](#) and [Youth Action Squads](#). They help inform policy priorities, review existing programs and initiatives, make recommendations on policies impacting youth and envision new solutions. Establishing a similar structure at the federal level would directly advance the goals of

this RFI by promoting greater civic engagement, improving policy decisions, and ultimately advancing better outcomes for children, youth and families

### *White House Conference on Children and Youth*

**We believe a White House Conference on Children and Youth would be an effective venue to launch this leadership structure, solicit feedback from stakeholders and draw attention to policies to advance equity for young people.** A conference could spur collective action across the public, nonprofit, philanthropic and private sectors to move the needle on an ambitious vision and measurable goals to improve the lives of children and youth.

Given the enormous stressors on the systems serving children in the wake of the COVID-19 pandemic, there is a powerful opportunity for another summit, combined with a federal backbone structure for children and youth, to spur meaningful policy change steeped in equity for children, youth and their families.

### *Federal Framework on Children and Families*

Our federal government currently lacks a common outcomes framework for children and families that is centered in equity. Guided by external partners, including non-profits, child-serving organizations, philanthropy, and youth and families themselves, the White House Office on Children and Youth could develop a federal outcomes framework for children and families. This interlocking framework across federal and state children's offices and coordinating bodies would work to unify equity-based efforts through budgets, strategies, metrics, community-based learning to better assess the impact of policies and programs on equity. Aligned goals and corresponding measures that matter will help to drive aligned incentives, shared accountability and ultimately improved outcomes.

As previously cited, Ascend at the Aspen Institute recommends a bold new framework that would “center child and family outcomes with performance measures that reflect meaningful outcomes in education, economic status, and health and well-being. Such a framework would not only strengthen existing interventions but seed a range of pilots and innovations, making the most of the inventive mindset that has emerged during the pandemic.”<sup>15</sup>

The federal leadership structure for children and youth described above, in close collaboration with Congress, would be essential to the successful development and implementation of a multi-generational equity framework. Cross-governmental collaboration could ensure that programs across the federal government are realigned to deliver and measure better, more equitable outcomes, starting in the earliest years of life.

Finally, OMB could work with a Federal Children's Cabinet and White House Office on Children and Youth to perform child impact assessments that would consider the impact of laws, budgets, guidance, regulations and other policies on children and youth, with a strong equity lens. This would include a structured set of questions to inform policymakers and advocates about the impacts, both positive and negative, of a proposed action on the lives of children and youth. Ensuring that child impact assessments focus on the impact of a proposed policy on equity would be critical.

As referenced above, the Kids Impact Initiative has developed [recommendations](#) for implementation of child impact assessments that ensure that youth input has been included in the process and that the impact of the proposed policy on equity has been considered. Moreover, OMB and a Federal Children’s Cabinet could share tools with states and localities to identify and assess the opportunities that exist within their respective locales to address equity. For example, the Child Opportunity Index examines the extent of racial/ethnic inequity in the distribution of children across levels of neighborhood opportunity. Increasing the use of tools to identify where the greatest inequities exist can help identify neighborhoods that are disadvantaged across multiple dimensions and that are appropriate sites for community development and other place-based interventions.<sup>16</sup>

### **Acknowledgement**

Nemours thanks our partners at Mental Health America, First Focus on Children, the Forum for Youth Investment, the Education Redesign Lab at Harvard University and Children’s Funding Project for their work in co-developing the content included in the “proposal” section above. Our joint documents can be viewed at <https://www.nemours.org/whoffice4kids>. While our organizations have co-developed joint content, this letter is solely intended to express the views of Nemours.

### **Conclusion**

Nemours commends your leadership in advancing EO 13985. Achieving whole child and family well-being grounded in equity will require the whole of government approach that you are seeking to advance. We believe establishment of a federal leadership structure for children, youth and families will ensure that policies to advance equity positively impact the trajectory of a young person’s life instead of only addressing disparities once they have already occurred. Our goal is to support all children and youth in reaching their full potential and optimizing their opportunities for success. We stand ready to assist you in any way we can and welcome the opportunity to partner to help all children and youth realize the bright futures they deserve.

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<sup>1</sup> Heckman, J. J. (2017). Four Big Benefits of Investing in Early Childhood Development. *The Heckman Equation*. [https://heckmanequation.org/www/assets/2017/01/F\\_Heckman\\_FourBenefitsInvestingECDevelopment\\_022615.pdf](https://heckmanequation.org/www/assets/2017/01/F_Heckman_FourBenefitsInvestingECDevelopment_022615.pdf)

<sup>2</sup> Horsch, A., & Stuijzand, S. (2019, 2019/05/27). Intergenerational transfer of perinatal trauma-related consequences. *Journal of Reproductive and Infant Psychology*, 37(3), 221-223. <https://doi.org/10.1080/02646838.2019.1629190>

<sup>3</sup> Bowers, M. E., & Yehuda, R. (2016, 2016/01/01). Intergenerational transmission of stress in humans. *Neuropsychopharmacology*, 41(1), 232-244. <https://doi.org/10.1038/npp.2015.247>

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- <sup>9</sup> James, C. V., Moonesinghe, R., Wilson-Frederick, S. M., Hall, J. E., Penman-Aguilar, A., & Bouye, K. (2017). Racial/Ethnic Health Disparities Among Rural Adults - United States, 2012-2015. *Morbidity and mortality weekly report. Surveillance summaries (Washington, D.C.: 2002)*, *66*(23), 1–9. <https://doi.org/10.15585/mmwr.ss6623a1>
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