

ADVANCING WORKFORCE HEALTH EQUITY

DEI INFORMED POLICIES AND PRACTICES



About HERO

The Health Enhancement Research Organization (HERO) is a national nonprofit dedicated to identifying and sharing best practices in the field of workplace health and well-being (HWB). HERO was established to conduct and share research, policy, leadership, and strategy to advance workplace HWB and provide leadership to the nation's workforce. The work that HERO does is achieved through the efforts of its volunteer committees. This report was produced by one such committee--the Healthy Workplaces Healthy Communities Committee and their Equity Policies & Procedures Workgroup.

Development of this report was led by HERO staff and volunteer committee members. Contributors to the report are listed below in alphabetical order. Findings and conclusions in this report are those of the contributors and do not represent the official position of the organizations listed.

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OVERVIEW

This report aims to share strategies for creating DEI informed workplace policies and practices as a means of advancing workforce health equity. Real world examples of policies and practices that advance health equity are included along with recommendations for creating diverse, equitable, and inclusive workplaces. The Healthy Workplaces Healthy Communities Committee, comprised of both HERO members and non-member community partners, discussed internal workplace policy areas and the possible impacts on workforce health equity. Taking feedback from the larger committee, a workgroup of six committee volunteers narrowed the focus to five key policy areas: talent management, work-life integration and leave, health benefits, wages and compensation, and communication. When reviewing the literature, workgroup members considered the potentially disproportionate impact internal policies may have on employee populations based on race, ethnicity, language, gender identity and gender expression, sexual orientation, and (dis)ability. Through an iterative process, 75 sources were identified for review. Key search terms included, but were not limited to: workplace equity, health equity, diversity equity and inclusion (DEI), social determinants of health (SDoH), workplace determinants of health, workplace policy, equity in workplace policy, and DEI informed employer policies and practices.

Committee volunteers were assigned resources to review individually and tracked key details associated with DEI and the five policy areas. Secondary reviews were conducted to compile key examples and information associated with the selected policies while also collectively identifying patterns of practices across various industries.

WHAT IS HEALTH EQUITY AND WHY IS IT IMPORTANT TO THE WORKPLACE?

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Health equity means that everyone has a fair and just opportunity to be as healthy as possible. This requires removing obstacles to health such as poverty, discrimination, and their consequences, including powerlessness and lack of access to good jobs with fair pay, quality education and housing, safe environments, and health care!”

—Robert Wood Johnson Foundation

The COVID-19 pandemic and issues of injustice for groups historically marginalized by social systems have served to amplify the critical importance of healthy equity in our communities. Those facing food and housing insecurity, lack of health insurance, and economic hardship were at risk for the worst mental and physical health outcomes during the pandemic. The Centers for Disease Control and Prevention documented that Black, American Indian, and Hispanic individuals were twice as likely to die from COVID-19 and two to three times as likely to be hospitalized.² One opportunity to address health inequities is to understand the role of the workplace and identify key areas where businesses can have a positive impact.

Employers have an important role in understanding and addressing workplace health equity through internal company policies and procedures that impact their workforce both within the organization and in our communities. On average, full-time employees spend half of their waking hours at work, making the workplace itself a critical determinant of workforce health.³ Studies show that employees with unmet health needs are more likely to miss work, which decreases productivity and increases turnover⁴. The decisions and actions employers take on policy areas and associated business practices, can impact workplace equity. For example, employers are often directly responsible for setting premiums and deductibles as well as insurance coverage for their employees. Employer policies related to talent management (e.g., hiring, recruiting, promotion, etc.), wages and compensation, benefit design and leave policies can unintentionally exclude certain employees or disproportionately impact the health of individuals in various ways. Also, the language used in employee communications can support and create a more inclusive, equitable workplace. Often workplace policies were created and implemented without applying a lens of equity and inclusion, thus unintentionally creating barriers for a diverse staff to thrive.

Organizations benefit from examining existing policies and practices through an equity lens to address those that disproportionately benefit certain groups and negatively impact others while also furthering systems of structural discrimination. By prioritizing diversity, equity, and inclusion in the workplace, employers have an opportunity to create a more inclusive and equitable environment where employees' needs are being seen, heard, and understood. Intentionally addressing health equity in the workplace improves employees' health, morale, and loyalty leading to improved productivity, reduced turnover, and healthcare savings⁵ can have far-reaching positive effects on the HWB of individuals, families, and communities and positively impact organizational value through improved employee engagement, talent acquisition, and retention, thus impacting the well-being of historically and systematically underrepresented groups.

HOW TO TAKE ACTION

Workplace diversity, equity, and inclusion (DEI) initiatives have been steadily growing in recent years⁶. The COVID-19 pandemic and renewed racial justice efforts have presented an opportunity for companies to examine and analyze workplace DEI efforts in alignment with the changing workplace and unique expressed needs of diverse employee populations. The way we work and live has changed, along with employee expectations and work arrangements. The Great Resignation is a call to action for a more flexible and innovative approach to how, when, why, and where employees work. The pandemic created an opportunity for employers to invest in robust diversity, equity, and inclusion strategies that acknowledge the changing needs of the employee.

One approach to consider when developing organizational policy is applying a Health in All Policies (HiAP) mindset. With this mindset, employers can work to avoid implementing policies and practices that inadvertently favor some while disadvantaging others. In addition, the health, equity, and sustainability consequences of policies should also be considered. Key elements included in HiAP⁷ are promoting health and equity, supporting intersectoral collaboration, creating co-benefits for multiple partners, engaging stakeholders, and creating structural or process change. Diverse and inclusive workplaces earn deeper trust and more commitment from their employees. A diverse and inclusive workforce is associated with better individual performance when employees feel motivated and engaged. How can employers evaluate internal policies and practices applying a DEI lens? In the following section, we will discuss workplace policies and practices that can impact employee health equity. Concepts and working definitions of key policy areas will be shared along with real world examples, employer actions, and practical suggestions for applying an equity lens to internal organizational policies and procedures.

The following five policy areas were reviewed for the purposes of this project, including working definitions, descriptions, and associated subcategories.



Talent Management: Talent management includes strategies and processes of a business to attract, retain, apply, and develop employee skills⁸

Diversity, equity, and inclusion is an imperative part of your talent management strategy. More diverse teams breed more innovation. Individuals representing different backgrounds with different lived experiences and perspectives help challenge norms, boost creative solutions, and illuminate blind spots. One way to attract new talent is to ensure they are represented and supported within the company. Integrating diversity, equity, and inclusion initiatives into your talent management strategy showcases the steps the employer is taking to recruit, attract, and retain current and future employees. A talent management strategy crafted through a DEI lens creates a culture where current and future employees feel a sense of belonging, their unique talents matter, and unique needs are cared for by their colleagues and leaders.

Subcategories of talent management: Overall hiring practices, external recruitment, employee evaluation processes, internal performance management at all levels, advancement opportunities, learning and development, and the built environment depending on job type/function.



Work-life integration and leave benefits: Work-life integration and associated policies, such as leave benefits, highlight the intersection of an employee's personal and professional life and responsibilities⁹.

Enabling employees to balance their professional and personal priorities is increasingly vital in today's world. As we evolve towards post-pandemic work environments, policies and programs that empower employees across the company to set work-life boundaries can lead to higher productivity and satisfaction in all areas of life. And one size does not fit all; meeting the diverse needs of employees is also key. Equity is achieved when work-life integration and leave programs acknowledge that different employees need different support, enabling all employees to achieve balance across their professional and personal lives.

Subcategories of work-life integration and leave benefits: Paid family leave; paid time off, sick, and bereavement leave; caregiving; and flexible work arrangements/scheduling.



Health Benefits: Group health plan benefits offered to employees, their dependents, and often the employee's spouse, by the employer¹⁰. Benefits may provide coverage and reimbursement for medical care, prescriptions, dental and vision benefits, and access to treatments.

The pandemic amplified the critical need for affordable and accessible health care for our workforce. The shift to at-home and flexible work arrangements forced organizations to expand the scope of health care, enable access to care, and ensure health literacy¹¹. The acknowledgement of diverse personal and family health needs is key to ensuring health and health equity across the workforce. In addition, workforce mental health came to the forefront during the pandemic, as the COVID-19 crisis and our response to it disrupted the way we live and work, adding new stressors and amplifying existing ones. Well before the pandemic, issues of employee engagement, burnout, and "diseases of despair" existed. Now with the pandemic waning, additional challenges related to returning to the workplace, new hybrid work models, economic and financial strain, and the Great Resignation further underscore the need for equitable health benefits.

Subcategories of health benefits: Benefit plans, EAP, programs that address health equity and access, health literacy/navigators, and workplace and digital well-being offerings.



Wages and Compensation: Direct compensation refers to wages paid by employers to employees in exchange for work. Compensation also includes variable pay in the form of short- and long-term incentives, such as cash bonuses, commissions and company stock awards¹².

Multiple aspects of employment can impact one's economic stability, including workload, job duties and associated exposures, job security, unpredictable hours, type of employment (e.g., underemployed, unemployed, part-time, full time, intermittent), the physical work environment, wages, and other compensations.^{13, 5, 14} Employees must receive fair and equitable compensation based on job duties performed with equal opportunities for advancement. In a system designed to historically favor specific populations over others (e.g., race, gender, ethnicity, physical ability), leading to unequal access to education, employment, and economic stability, employers must assess and address internal policies and practices around wages and compensation to ensure equitable practices. It is also important to highlight a distinction between wage parity (e.g., equitable practices across various groups) and a living wage (e.g., equitable compensation practices relative to other employers).

Subcategories of wages and compensation: Pay equity and living wage, job descriptions, associated salary ranges and pay bands, bonus and commission structures, and incentives goals and policies.



Communication: Key communication categories include what is written and disseminated but also what is observed and seen in the workplace (e.g., verbal/auditory, visual and written communications, use of pronouns, person first language, visual image selection and representation, location and accessibility of communication, etc.).

Communication by the employer should be culturally appropriate and informed, representative of the employee population and community at large, and accessible through the lens of diverse abilities, literacy, and language. In addition to having formal written DEI informed communication strategies and policies, employers must also ensure employees have equitable access to benefits and understand how to use them.⁴ The promotion of employee literacy as it relates to understanding health and benefits is critical and can be supported through workplace educational programming, tools and resources.

Subcategories of communication: Internal and external communications, language used to reflect employee population, internal documents and forms.

Policy Area

Employer Actions

Real World Examples

Questions and Considerations for Employers



Talent Management

(e.g., recruiting, hiring, retention, advancement)

Create an inclusive hiring practice model that aligns with your organization's DEI strategic plan.

Make your recruitment process more accessible¹⁵. Ensure application systems are accessible to individuals with disabilities by providing accessible Information and Communication Technology (ICT) as part of the application, onboarding, and employment process. Think about how your job advertisements sound, and where you are recruiting. Provide reasonable accommodations during the application and interview stages. Consider using tools such as **Even Break**, a job board specialized in reaching applicants with disabilities.

Develop external recruitment strategies that connect with local groups from underrepresented communities (e.g., race, ethnicity, gender, ability, etc.). Examples include local community colleges, Historically Black Colleges and Universities, and other universities; local and state vocational rehabilitation services; the U.S. Department of Labor Veterans' Employment and Training Service (VETS) regional offices; and U.S. Department of Veterans Affairs Veteran Readiness and Employment (VR&E) coordinators.

Keep equity in mind when designing the hiring process to ensure inclusive hiring. For example, cultural differences can affect first impressions of a candidate during an interview. Consider that not all cultures express qualities like self-confidence and leadership in the same way. Build transparency into the hiring process, facilitate open communication, and invite applicants to provide clarification where needed.

Greyston Bakery applies an open hiring policy to employ individuals who have faced barriers in getting full-time work. Greyston's workforce development programs offer job training and certification in high-demand employment areas such as IT, healthcare, business, construction, security, and hospitality. Greyston provides re-entry services for justice-involved individuals, including pre-release workforce training in correctional facilities and a post-release paid apprenticeship program designed to strengthen the individual's work record and skillset while transitioning to a full-time job.

University of Washington

Everyone involved in the interview process and on interview panels is enrolled in implicit bias training to reduce bias in the hiring process. During the interview process, at least one Diversity, Equity, and Inclusion question is asked. Post interview process, the interview panelists discuss how candidates scored differently and they question any assumptions. Additionally, job postings use inclusive language, jobs are posted on diverse listservs, and the most important competencies are defined in the job posting.

XPO Logistics Freight transporter XPO Logistics last year became one of the first in its industry to establish a DE&I office. The company, based in Greenwich, CT, also invested in development programs for employees at all levels, launched "employee resource groups" for particular demographic and psychographic cohorts among its workforce, launched an "Inclusion" broadcast series internally and developed new partnerships with organizations including those for Historically Black Colleges and Universities.

• Is there adequate opportunity for advancement and promotion in your workplace for all employees?

• Are performance management processes equitable and fair? If so, how? If not, what is one small step the organization can take to correct this?

• Does your organization implement implicit bias training for employees involved in the interview and selection process?

• Does your organization require staff from all levels of the organization to complete DEI training and on-going education?

• How do employees describe their sense of job security? Do they feel their employment status could change at any point?

• Are there hiring policies in place that might inadvertently impact particular populations more than others?

• Are you conducting thorough audits of the hiring process? What actions occur after an audit is conducted to ensure changes are made?

• Are you measuring progress in these areas? If so, how? If not, how can you start?

Policy Area	Employer Actions	Real World Examples	Questions and Considerations for Employers
<p>Talent Management, cont.</p>	<p>Include sexual orientation, gender identity and gender expression in nondiscrimination workforce policies for all operations, and when applicable, communicate how non-discrimination policies apply to customers.</p> <p>Consider your succession planning approach and look to hire new leaders that align with and support business equity values. Build equal-representation practices and policies into leadership roles.</p> <p>Create a talent management toolkit of resources and experts that can assist with your talent management efforts.</p> <p>Make it easier for employees that identify as neurodivergent and having a disability or presenting with diverse abilities to switch jobs/look for new internal jobs within the organization without having to re-submit information about their disability. If employees have to resubmit this information every time they apply for an internal position, they may be less likely to do so.</p> <p>See performance and talent management as a way to support each individual to achieve their potential in the workplace. Engage employees in informing retention-focused practices and offer safe and inclusive opportunities for feedback.</p> <p>Ensure representation of diverse populations in your Board of Directors and leadership positions.</p> <p>Hold executive leaders accountable for driving DEI outcomes and train managers and others through the organization to practice DEI.</p>	<p>At JPMorgan Chase & Co., the Office of Disability Inclusion (ODI) drives initiatives and provides strategic direction to the firm with a focus on four areas: Attitude, Accessibility, Accommodations and Assimilation. The ODI and Cornell's Employment and Disability Institute have partnered to create Resource Guides to answer questions that employees/managers ask most about working with their colleagues with disabilities. In addition, they have standardized the way the firm delivers reasonable accommodation and assistive technology to employees and job applicants and have taken a proactive approach to find—and do business with—companies owned by people with disabilities.</p> <p>3M commits to advancing the representation of underrepresented groups, and the talent acquisition processes promote increased connections with candidates from underrepresented groups and strengthen the talent pipeline. Interview processes have been redesigned to remove individual discretion and bias, and 3M has invested in a new interview management system focused on skills-based hiring. 3M also implemented racial inclusion advocacy education, including unconscious bias training, at all levels of the company, with an initial focus on the United States.</p>	

Policy Area	Employer Actions	Real World Examples	Questions and Considerations for Employers
<p>Talent Management, cont.</p>	<p>Thoroughly review and assess talent management policies and processes to identify those that limit opportunity or contain implicit bias (e.g., job advertisements, application pool, accessibility, etc.).</p> <p>Keep track of who gets opportunities for promotion most. Data shows that managers tend to give high-visibility work only to in-group team members and promotions to those who know somebody and don't select people of color for client-facing or revenue-generating jobs that can lead to c-suite roles.</p> <p>Have research backed and informed DEI training programs that include both awareness and skills development. Training programs should include race, ethnicity, gender expression and identity, ability, age, and sexual orientation.</p>		
 <p>Work-Life Integration and Leave</p> <p>(e.g., leave, benefits, scheduling, time off, caregiving)</p>	<p>Develop hybrid work models that include lower salaried workers. Is a hybrid model being applied throughout your organization, giving equal opportunity to work a hybrid schedule where possible?</p> <p>Ensure that remote and hybrid work opportunities are equitably accessible across job classes and levels. For jobs where this is not possible, provide autonomy to employees to inform work flexibility.</p> <p>Where possible, limit shift work, which has shown to have negative health effects and bring about social disruption for employees. If this is not possible, consider designing health promoting shift schedules.¹⁶</p> <p>Facilitate a culture of work-life integration and flexibility throughout the organization, from leaders to entry-level and front-line workers.</p>	<p>Bank of America offers 16 weeks paid maternity paternity and adoption leave; reimbursement for eligible adoptions; fertility and surrogacy expenses; no-cost expert support pre- and post-birth for new or future parents through pregnancy, adoption, or surrogacy; and comprehensive childcare reimbursement programs. Additionally, a Family Planning Reimbursement program provides up to a collective \$20,000 lifetime maximum, and a Family Support program offers expert pregnancy, fertility, egg freezing, adoption, surrogacy, infancy, and postpartum support at no cost for new or future parents and their spouses or partners. Back-up child care reimbursements are also available.</p> <p>Alteryx¹⁷ offers four mental health days for all employees that can be scheduled throughout the year and mental health first aid training. There</p>	<ul style="list-style-type: none"> • Are shift work schedules designed to promote/facilitate favorable health outcomes? • Are leave benefits equitable across job functions? • Is paid sick leave available for all employees irrespective of hours worked, job function, wage, race, ethnicity, gender, and ability? • Do you offer paid maternity/paternity leave? Paid caregiver leave? • Who is included in your definition of family for paid family leave? Do maternity and paternity benefits include adoptions? • Are LGBTQ+ families able to fully utilize benefits? • Are people taking PTO? Do you have a culture that enables and celebrates PTO?

Policy Area	Employer Actions	Real World Examples	Questions and Considerations for Employers
<p>Work-Life Integration and Leave, cont.</p>	<p>Avoid work emails and contact during off work hours and vacation.</p> <p>Develop part-time work and job-sharing options where possible.</p> <p>Track and reward usage of PTO for each individual. Train people managers on PTO policies and utilization best practices.</p> <p>Ease transition back to office for new mothers and birth parents by ensuring there are enough lactation rooms.</p> <p>Support child, elder, and other family member care: care burdens that most often fall on women. Solicit guidance and input from employees on the type of policies and would be most supportive of their needs.</p> <p>Broaden eligibility for paid family leave policies ensuring they are inclusive and responsive to varying family types (e.g., new baby/adoption/foster, care for a family member with a serious health condition or special needs, a worker’s own serious health condition, partner in active-duty military, or a survivor of domestic violence).</p> <p>Broaden definition of family to include a parent or parent of a spouse or domestic partner, spouse, domestic partner, grandparent, grandchild, sibling, or an individual with whom the covered individual has a significant personal bond that is or is like a family relationship, regardless of biological or legal relationship.</p> <p>Establish a trans-inclusive restroom/facilities policy.</p> <p>Evaluate dress code for gender-neutrality.</p>	<p>is also an agreement that there will be no meetings held the first Friday of every month for Breakthrough Fridays.</p> <p>Alteryx added two additional companywide holidays in the Spring and Fall showing support of mental health awareness. They also track and encourage use of PTO.</p> <p>Johnson & Johnson offers all employees maternal, paternal¹⁸, adoptive or surrogacy-assisted—eight weeks of paid leave that can be taken during the first year of a new child’s arrival into their family. Plus, mothers in the U.S. who have given birth can take up to 17 weeks of paid leave.</p> <p>Google offers flexible time off, including for a variety of personal circumstances (e.g., vacation, bereavement, jury duty, sick leave, parental leave, disability, holidays, global reset and well-being days). In addition, they offer four “work from anywhere” weeks per year and two work from home days each week for many roles as part of a hybrid work model.</p> <p>Chevron Gas & Mobile¹⁹ has taken a stand for their transgender employees through education. They were globally known as “Employee Resource Group of the Year” because of their release of an educational pamphlet outlining employee transition guidelines, complete with gender terminology, differentiating sexual orientation, and creating a workplace engagement plan. Their peer-to-peer based company training culture effectively reduces stress for transitioning employees by placing social conduct responsibility on everyone, such as including management support in creating healthy conversations about the transition process.</p>	<ul style="list-style-type: none"> • Are sleep disturbances considered when planning travel for your frequently traveled employees? • Can technology be better utilized to enable at-home and flexible work arrangements across job functions? • Are departments allocating part-time and flex-time positions? • Are employees able to disconnect from all business communications during their “off” time without penalty?

Policy Area	Employer Actions	Real World Examples	Questions and Considerations for Employers
 <p>Health Benefits and Workplace Well-being</p> <p>(e.g., health and medical benefits, well-being strategy)</p>	<p>Ensure all employees are able to leave work for preventive care and screenings without penalty.</p> <p>Provide no-cost, virtual primary care medicine, behavioral health, and mental health resources to minimize barriers to access.</p> <p>Ensure provider directories include patient race/ethnicity/gender and languages spoken to ensure that patients have the option to select concordant providers.</p> <p>Ensure that provider networks have sufficient diversity to meet benefits enrollee needs – through either in-person or virtual offerings.</p> <p>Communicate how to locate and identify diverse providers (e.g., race, gender, ethnicity, languages spoken) in employee communications and provider selection process.</p> <p>Provide ongoing education, training, and resources to ensure all employees from across job categories, roles, and demographics understand benefits coverage and how to access care.</p> <p>Ensure parity of coverage for physical and mental health conditions.</p> <p>Train and partner with Employee Resource Groups (ERG) to promote EAP and wellness programs, addressing unique needs of each population.</p> <p>Make sure that ERGs perspectives are elicited to ensure that provided benefit offerings meet the needs of the workforce.</p> <p>Offer social determinant of health and needs screenings coupled with referral services for members, especially for food insecurity, and virtual care.</p>	<p>For more than a decade, Delta Airlines has provided benefits and privileges to same-sex spouses and same-sex domestic partners of its U.S.-based employees, including health benefits, optional insurances, survivor income, and pass travel.</p> <p>Metro Nashville Public Schools offers 5 onsite medical clinics strategically placed throughout the district to allow same day access with no longer than a 15-minute drive for employees. All services are offered with no patient cost-sharing and include primary care, behavioral health, physical therapy, chiropractic care, acupuncture, health coaching, Group Medical Visits, and a fitness center with group classes and personal trainers. The district has also removed all behavioral health copays for in network providers, and has worked with local institutions to develop bundled programs with concierge care navigation for maternity, orthopedic, and substance abuse disorders that beneficiaries can choose to participate in with no out-of-pocket cost.</p> <p>In March 2021, JPMorgan Chase & Co. launched a global COVID-19 Vaccine Speaker Series in partnership with the firm’s 10 business resource groups (BRGs) focused on vaccine hesitancy, based on research, in underrepresented communities including: Black, Latinx, Asian Pacific, LGBTQ+ and Disabled. Sessions featured 30 external subject matter experts, consisting of 16 medical professionals and 13 change agents/influencers. Over 22,000 employees registered for the events. Content was customized for each diverse group with overall objectives to engage and inform employees about the importance of getting vaccinated.</p>	<ul style="list-style-type: none"> • Have employers heard directly from employees and their family members as to what benefits they value to promote their health and well-being? • Do all employees have equitable access to affordable benefits with some type of wage-based subsidy for lower income earners? • Do all employees have the ability to leave work without penalty to obtain recommended preventive care services, including cancer screenings? • Is the health plan offering social determinants of health screening and referral services for members, especially for food insecurity and adverse childhood experiences? • How do you ensure health benefits communications are inclusive of diverse languages, literacy levels, and physical reading abilities? • Is there an undue burden of proof for those in domestic partnerships (e.g., proof of comingled finances)? • Is there a disproportionate health care cost burden for lower wage earners? • Is access to virtual care equitable (e.g., Zoom, Microsoft Teams, wireless internet etc.)? • Are you utilizing employee surveys to determine what benefit resources are requested by employees?

Policy Area	Employer Actions	Real World Examples	Questions and Considerations for Employers
<p>Health Benefits and Workplace Well-being, cont.</p>	<p>Vary medical premium contribution by pay level, with larger company subsidies for those earning less to develop equity in health care cost burden amongst employees.</p> <p>Work with EAP vendor providers to integrate services into workplace health and well-being strategy.</p> <p>Provide equal benefits to married spouses and unmarried partners with fair and equitable standards for documentation of relationship status.</p> <p>Work with the insurance provider or administrator to adopt guidelines of coverage for medically supported transition-related care and ongoing treatments such as hormone therapies. Ensure compliance with WPATH standards as the basis for transgender health benefits coverage. Employers should be aware of changing state mandates as they apply to their employees.</p> <p>Provide equivalent coverage for transgender individuals without exclusions, ensuring equivalency in spousal and domestic partner benefits.</p> <p>Clearly communicate benefit layers such as traditional health and medical benefits, well-being resources, volunteerism policies and perks ensuring culturally, linguistically, and health literacy level appropriate content and dissemination strategies.</p> <p>Provide information on MDs who are LGBTQIA+ friendly and what specific benefits this population has available to them.</p> <p>Provide clinician race and ethnicity, training and experience with cultural humility in treating diverse client population.</p>	<p>At Hennepin County, members of the health plan pay no copay or deductible for mental health and substance use visits for both in-network and out-of-network providers, allowing for maximum coverage for preferred providers. Additionally, online cognitive behavioral therapy programs are available at no cost for employees and family members, and a variety of mental health-focused classes and events are offered – from cooking classes about food and mood to storytelling events with diverse speakers aimed at reducing stigma. In addition, Hennepin County is working to identify new vendors to increase diversity in wellness offerings and providers.</p> <p>Dojo4,²⁰ a software, web, and mobile design business and B Corp in Boulder, CO, realizes the importance of offering health insurance and other benefits to all of its employees. Part-time workers at Dojo4 became eligible for health insurance benefits in 2019, when the cooperative began offering it to all member-employees.</p>	

Policy Area

Employer Actions

Real World Examples

Questions and Considerations for Employers



Wages and Compensation

At a minimum, pay a living wage across all levels of the organization.

Aim for higher wage levels that move employees beyond living paycheck-to-paycheck and allows them to save and thrive.

Do not ask for previous salary history nor ask applicants to name a salary when hiring.

Annually audit compensation and bonus structures controlling for factors such as race, ethnicity, gender, education, years of experience, and position level. Include contract workers, temps and vendors as part of the pay equity goals and process review.

Adjust wages as a result of routine pay equity evaluations and audits, making adjustments where needed.

Ensure fair pay practices at all levels of the organization that also include the company supply chain.

Educate employees on wage theft and have strict policies in place for reporting.

Offer free financial well-being services to all employees, regardless of full, part, or contract appointments (e.g., saving, retirement planning, investment education).

Provide wealth-building benefits (e.g., 4019k), access to bank accounts, stock ownership plans) to all employees including part time workers.

Provide managers with data letting them know where they stand in terms of pay for individuals based on identified DEI wage equity goals.

At **Starbucks**, executives are collectively accountable for three-year representation targets focused on increasing Black, Indigenous, and Latino representation in managerial positions in the corporate sector. If targets are met or exceeded, payout increases by 10%. There is an automatic 5% reduction to payout if growth is 0-5%, and 10% reduction to payout if growth is negative.

Unilever has a Code of Business principle that speaks to pay equity and earning a living wage: Unilever will provide employees with a total remuneration package that meets or exceeds the legal minimum standards and in line with industry standards in the markets in which Unilever operates. Unilever is committed to giving employees a living wage, ensuring that they can meet their everyday needs. Additionally, Unilever conducts a living wage audit each year using their Framework for Fair Compensation.¹⁴ The audits check that fixed compensation is achievable without the need to work an excessive number of hours, that country payroll processes deliver employees' full pay correctly and on time, and that there is no unequal pay between genders. Lastly, the internal policy on the Sustainable Employment of Temporary Workers requires that in-sourced third-party temporary workers on the manufacturing sites be given comparable terms and conditions to those of employees, including the payment of a living wage.

Tom's of Maine²¹ pays the lowest-paid workers more than 25% above a living wage.

Dr. Bronners²² caps the pay of its highest-paid executives at five times that of its lowest-paid, fully vested employees, who make approximately \$28 per hour.

- Do all employees have access to regular pay? Do opportunities exist to facilitate access to emergency funds/ advance pay in the event of a financial crisis?
- Do all employees have predictable work schedules to ensure a steady source of income?
- Do you understand what your employees desire in terms of equitable work scheduling and pay? If so, how do you know? If not, how might you address this knowledge gap?
- Do employees receive employer support to promote their financial well-being, either through retirement fund contributions or performance-based incentives or both? Is this available to employees regardless of full-time status?
- Do you periodically conduct living wage and pay equity audits?
- What actions are taken following wage audits?
- What is your plan to measure success in reducing compensation inequities?
- How will you continue to review your policies while ensuring an objective and regularly scheduled reporting process with defined metrics to evaluate progress?

Policy Area	Employer Actions	Real World Examples	Questions and Considerations for Employers
<p>Wages and Compensation, cont.</p>	<p>Consider set annual contributions regardless of employee 401(k) contribution level.</p> <p>Publish compensation levels, including bonuses, across all roles including job categories and pay bands when posting jobs on public platforms.</p> <p>Adopt and advertise a formal policy communicating your commitment to providing a living wage that is evaluated on a regular basis against local and national markets and adjusted accordingly.</p> <p>Evaluate for disparities in utilization of employer-sponsored financial services and programs being offered, making adjustments in delivery of services to understand the needs and maximize engagement across employee demographics.</p>	<p>More than half of Dr. Bronner’s employees are women, and nearly 60% are People of Color.</p> <p>3M has achieved pay equity within 90% of their global employee population and continues to make progress toward enterprise pay equity. An analysis of their largest countries — comparing national average raw pay gap data between men and women to 3M’s compensation data — showed that raw pay differences are below external benchmarks. Fourteen of the 17 countries analyzed show an adjusted gender wage gap of 1% or less.</p>	
 <p>Communication</p> <p>(e.g., internal and external)</p>	<p>Establish and utilize Employee Resource Groups (ERGs) that align with your DEI program and include them in developing communication efforts, ensuring both internal and external publications are informed, accessible, and representative.</p> <p>Establish policies/procedures that allow for optional sharing of pronouns and name if it is different than legal name</p> <p>Provide opportunities for employees to list pronouns and name on hiring documentation and nametags</p> <p>Ensure internal communications (e.g., intranet, newsletters, onboarding documents, benefits communications) are provided in languages representative of the employee population and accessible based on diverse physical abilities.</p>	<p>At Goldman Sachs, employees can attach flags to their desks that create a sense of identity, and includes individuals that identify as an ally or LGBTQ+ member. Additionally, in the future, the company’s internal directory will allow employees to include preferred pronouns.</p> <p>Salesforce is taking steps to bring inclusive communication to their clients by removing the most harmful language from content and code (i.e., whitelist and blacklist), which clearly do not align with equity values, thus creating a sustainable and scalable process.</p> <p>Novartis believes that diversity is integral to their success, because it helps them to understand the unique needs of their patients and find innovative ways of addressing those needs. Within the organization, the word ‘disability’ has been</p>	<ul style="list-style-type: none"> • Are your communications teams trained on accessible design principles? • Do you have marketing guidelines with agreed upon language so that you use consistent terminology for equity and inclusion? • Do you have a diverse communications team who can design culturally informed and appropriate messaging? • Do you have a way for staff to provide feedback on communications without fear of retribution?

Policy Area	Employer Actions	Real World Examples	Questions and Considerations for Employers
<p>Communication, cont.</p>	<p>At all levels of leadership, offer training programs and meetings to communicate your commitment to an incisive workplace culture, including ERG representatives.</p> <p>When employees are included in visual communications, both internal and external, ensure diverse representation across race, gender, age, and ability.</p> <p>Evaluate HR and communication documents to ensure gender neutral language is being applied.</p> <p>Include response options beyond “male” and “female” on surveys.</p> <p>Review organization communications and documents assessing accessibility across languages, dialects, and ability ensuring they align with your employee populations.</p> <p>Remove gendered language from policies, e.g., instead of “he/she” use “they”.</p> <p>Communicate about workplace policies and benefits through a variety of avenues and technologies, ensuring all employees are reached. Be mindful of work status (e.g., contract, PT, remote, shift, etc.), job function, diverse abilities, and language.</p> <p>Review organizational communications for cultural appropriateness, diverse representation and accessibility.</p> <p>Openly and consistently share efforts toward positive change in culture, policy, and practices as well as their outcomes. This will facilitate greater employee buy-in into proposed and engagement in positive practices.</p>	<p>replaced with ‘diverse ability’ because they don’t view people living with disabilities as having a lack of ability, but rather having diverse skills and proficiencies. HR professionals in the company are also educated on topics such as unconscious bias, inclusive leadership, disabilities/accommodations and compensation/pay equity in order to improve their diversity hiring methods²³.</p> <p>Johnson & Johnson makes a point to incorporate diverse voices into its marketing concept meetings. The company is also a founding member of the <i>Unstereotype Alliance</i>, which works to tackle gender imbalance in advertising.²⁴</p> <p>Sirius XM/Pandora/Sticher²⁵ has an inclusive language project underway with the aim of replacing nonexclusive language with inclusive language in the workplace. Instead of HR and DEI generating a list of words to be replaced with alternates, functional workgroups were created across departments to identify words commonly used within their functional areas and identify those that need to be replaced with inclusive language. This makes the project workgroup specific and includes the employee voice in the process.</p>	

WHERE TO START

For an organization to commit to improving health equity in a meaningful way, it must be prioritized as a strategic initiative. As described in the previous sections, there are multiple opportunities to analyze existing policy areas through an equity lens.

1. ASSESS

A natural place to start is by assessing your organization for gaps and collecting baseline data. Examine the current policies and data with equity in mind. Look at the benefits the organization offers to make sure they include resources for a diverse and representative employee population.

- Survey your staff ensuring everyone's voice is represented. Talk with employees, particularly those from underrepresented groups. With surveys, be mindful that language/literacy issues and other personal priorities may limit responses from individuals who are traditionally underrepresented – which may bias/skew reporting and interpretation of the data. Make it a point to ask others, specifically those who are traditionally underrepresented, what matters to them.
- When setting baseline data, remember to consider what conditions your employees face outside of work in their communities (e.g., food deserts, crime rate, accessibility to healthcare and childcare).
- Look at health risk assessment data and make appropriate swift changes. Communicate your plans with employees.
- Do you have a DEI strategy? Does your DEI strategic plan align with the mission and vision of the organization? Ensure that DEI efforts also take into account equitable benefit design. This includes assessing any policies and practices that may have a negative health or well-being impact on the individual or the whole of the organization.

2. COLLECT DATA

Use the data collected to build report cards to share with leaders and build action plans to address the gaps. Prioritize areas that need the most improvement. Set clear goals with measurable outcomes. Collect ideas for interventions and resources to address the identified gaps. Dig into what resources are available from existing partnerships.

- Set up training sessions to advance understanding, appreciation, and support of DEI workplace initiatives and policies. You may consider creating Employee Resource Groups to create a sense of comradery and support for employees in the workplace.
- Look for available resources from current partners or through the community that could address identified needs.
- Remember, you may not hear all voices when implementing surveys and/or collecting data. You may wish to create a combined approach of survey implementation and qualitative analysis to ensure that the data collected is representative of your diverse employee population (e.g., race, compensation level, job role, ethnicity, gender) and not just the small percentage of employees that typically respond to surveys.
- Develop goals informed by data collection. Is there enough data present that represents the majority of the population to create goals and measurable outcomes? If not, it may be best to understand what other data may be useful so program and policy implementation speaks to the larger employee base.

- Collecting data from population subgroups- racial, ethnic, or socioeconomic- that comprise the organization can shed light on the unmet needs and the organization. This, in turn, can open up pathways for enhanced inclusiveness and greater equitable improvements in employee health and well-being.
- Consider other modes of data collection as well such as focus groups or informational interviews. Underrepresented populations may respond differently to different modes of data collection.

3. FORMALIZE A PROCESS

Formalize the process of data collection and assessment to ensure that the process of program and policy implementation continues to speak to the evolving workplace environment and the changing needs of the employees. Assess the outcomes of your actions. Are people better off after changes were made?

- Resurvey. Measure data and repeat the process ensuring the majority of voices are heard before any changes are made or policies implemented.
- Consider a *Total Worker Health*[®] approach. The National Institute for Occupational Safety and Health has developed *Total Worker Health*^{®26}, an evidence-based approach that prioritizes safety at the workplace, safe and healthy design of work, and positive work experiences as a way to achieve worker well-being. Grounded in health equity and geared toward reducing occupational health disparities, the *Total Worker Health*[®] (TWH) program recognizes work as a key social determinant of health and emphasizes organization-led efforts to ensure employee safety, health, and well-being. The TWH program provides guidance such as making the business case, tools for getting started with TWH, and promising practices from organizations that have implemented the TWH approach, along with publications and education resources from *Total Worker Health*[®] Centers of Excellence across the country.
- Create a systematic process of evaluating benefits, policies, and practices on a regular basis. Employers may wish to incorporate these systematic processes, analyses, and reporting into broader DEI efforts to evaluate the effectiveness of benefit design, policies and procedures over time. “Tying in the health preferences and needs of different populations subgroups into the systematic process can inform a more inclusive and equitable approach to benefits planning.”²⁷

CALL TO ACTION

The workplace is a significant determinant of health. Employers play a crucial role in how benefit offerings, internal policies, and practices are designed and implemented, having a direct impact on employee well-being and the workplace experience. By adopting a “Health in All” policies mindset, employers can begin to understand how the current benefit design and existing policies and procedures can impact the physical, emotional, and financial health of employees. By recognizing those workplace factors, such as benefit offerings, work-life integration policies, and wages and compensation, can be deleterious to employee health, employers can begin to move the needle towards more equitable workplace practices.

Resources

- HERO Health and Well-being Best Practices Scorecard in Collaboration with Mercer©, <https://hero-health.org/hero-scorecard/>
- Human Rights Campaign Foundation's Corporate Equality Index, <https://www.hrc.org/resources/corporate-equality-index>
- Out & Equal Workplace Advocates, Toolkit for Change: Assessing LGBTIQ+ Inclusion in Your Workplace, <https://outandequal.org/toolkit-for-change-assessing-lgbtqi-inclusion-in-your-workplace/>
- Meyer Memorial Trust, Diversity, Equity and Inclusion Spectrum Tool, <https://mmt.org/sites/default/files/Meyer%20DEI%20Spectrum%20Tool%202018.pdf>
- Berkeley Haas, DEI Checklist (EGAL), https://haas.berkeley.edu/wp-content/uploads/EGAL_DEIChecklist.pdf
- Racial Equity Tools (multiple tools available), <https://www.racialequitytools.org/resources/plan/informing-the-plan/organizational-assessment-tools-and-resources>

- American Heart Association CEO Roundtable, Driving Health Equity in the Workplace, <https://www.heart.org/-/media/files/about-us/driving-health-equity/ceorthealthequitymanuscript.pdf?la=en>
- Robert Wood Johnson Foundation, Improving Access to Paid Family Leave to Achieve Health Equity, <https://www.rwjf.org/en/library/research/2021/05/improving-access-to-paid-family-leave-to-achieve-health-equity.html>
- MIT, Living Wage Calculator, <https://livingwage.mit.edu/>
- Human Rights Campaign Foundation's, Transgender Inclusion in the Workplace: A Toolkit for Employers, https://assets2.hrc.org/files/assets/resources/Transgender_Inclusion_in_the_Workplace_A_Toolkit_for_Employers_Version_10_14_2016.pdf
- Institute for Economic and Racial Equity, Brandeis University, Diversity, Equity, and Inclusion (DEI) Organizational Assessment Tools: A Resource Guide, https://heller.brandeis.edu/iere/pdfs/dei_organizational_assessment_tools.pdf

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