EQUITY & INCLUSION DIVISION

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1/30/2024

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Subject: Oregon Data Literacy Framework: Report Release and Public Comment Period

Thank you for the opportunity to comment on the Oregon Data Literacy Framework. Thank you for the proposed framework for developing statewide training standards for data literacy. We are very pleased to see that the framework also centers equity in this process. Below we share four concerns along with some suggestions.

First, we are concerned, that equity is viewed as a subset of the framework's discussion of "ethics" and is usually mentioned last. The document calls for "equity considerations" and "equity implications" numerous times without any detail as to what these considerations and implications are. We suggest that this framework provide more details on the equity considerations and implications in the field of data practices. It would be helpful to identify what these considerations and implications might look like for data practitioners. For example, the framework could include reference to REALD & SOGI, which came from communities in Oregon, and is essential in standardizing how race ethnicity, language, disability and sexual orientation and gender identity data is collected. We understand that REALD & SOGI might have been omitted due to be required only by OHA and ODHS, but we think there is a way to include as a model and as an example of practicing data equity.

Second, we suggest ethics should be implemented in every level of the framework, as there are ethical impacts in every step from collection, cleaning, analysis, visualization, to storytelling. Equitable data comprehension and analysis isn't a checkbox item, it is integral to every level of research and data analysis. For example, perhaps a column could be added to the table on Capabilities on page 5 labeled 'equity considerations.' As equity needs to be considered at each step. And to further illustrate how this could be integrated within the capabilities table, under 'interpretation', to what extent does the analyst's interpretation resonates with how communities would interpret, making meaning out of the data. And who does the storytelling?

Third, the lack of reference to 'member-checking' with communities most impacted by health inequities in the Personas/Roles table on page eight is striking. We understand that this might not be applicable to all datasets, but data systems with REALD & SOGI data should have a process in place to ensure fidelity not only to the REALD & SOGI standards, but also in checking interpretation and meaning making. Fourth, we applaud the focus on data literacy; increasing data literacy is vital for Oregonians when it comes to understanding our world and the factors that impact us all. Comprehension of the meaning of the data is the end goal of data literacy, as knowing the context is just as, if not more important, as understanding the variables within the dataset. Therefore, as you push forward to increasing data literacy, there needs to be an equal effort in increasing the understanding of the meaning behind the data along with data equity practices, such as the internalization of creating research in partnership with community, designing datasets that are led by the community it is representing, and applying REALD & SOGI elements at every opportunity. It is not equitable to merely teach new jargon-heavy language to communities; instead, it is better to step into communities and learn their language to teach comprehension of data practices.