



Washington State Office of Equity Federal Memo Guidance

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Purpose

The Washington State Office of Equity (Office of Equity) is providing this guidance to state agencies in response to questions we have received regarding U.S. Attorney General Pam Bondi’s Memorandum for all Federal Agencies issued on July 29, 2025 (“July 29 Bondi Memo”) and to reaffirm Governor Ferguson’s commitment and Washington state’s approach to serving everyone. We are proud of our state’s values and continue to learn and improve to be more effective, efficient, and impactful.

This guidance builds upon previous Office of Equity [guidance](#).

Guidance

The July 29 Bondi Memo states it provides non-binding guidance, not mandatory requirements. Agencies should keep doing what they’re doing; continue to ensure that their programs and activities are legally compliant, continue working to ensure all Washingtonians have fair access to opportunities and the resources and benefits available to them, and keep advancing a Washington for All.

Equity initiatives are important to ensuring access by all, to all opportunities, and they are an important proactive component of preventing discrimination. Importantly, Washington State’s

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legally compliant policies are not discriminatory or so-called “illegal” DEI; we’re innovating ways to better serve everyone who lives in Washington. This includes:

- Hiring practices that remove barriers to employment for all applicants. Practices such as: Redacting names on applicant resumes because names do not indicate someone’s qualifications for the job. Requiring trainings on how to interview candidates fairly without personal preferences or biases. Conducting outreach programs that invite candidates from all backgrounds. To not show preference to any one particular race, gender, or other legally protected status. These practices help ensure all applicants have a fair opportunity to earn a living and succeed. To gather better data on the real experiences of all Washington communities to ensure every person has access to the opportunities and resources they need to pursue the life they want to lead.
- Education that helps us understand the history behind the current needs of Washingtonians across the state. For example, an educational session that discusses the historical experiences of Black patients in medical care and ways to address bias does not exclude any individuals. All are welcome to attend to learn from our history to better serve everyone who lives in Washington today.
- Maintaining welcoming spaces for all employees and members of the public, regardless of gender identity, immigration status, disability status, nation of origin, justice involvement, education level, and race and ethnic identity.

Washingtonians have been very clear: They demand to be treated fairly by their government. Ignoring the unique needs of each community and withholding resources does not help our government fulfill its responsibilities to the people of Washington state.

- For example: A person using a wheelchair or pushing a stroller may not be able to use the stairs to enter one of our buildings because of varying levels of mobility. They may require a ramp to be able to access the programs and services being offered in that building.

As government, we should continue **seeking opportunities to increase fairness** in our communities. It is our responsibility to promote policies and remove barriers, so all persons are treated fairly in our state. We cannot do that without first understanding who has not been treated equitably and why. We must work to understand the needs of everyone in Washington and develop policies, procedures, and practices to promote fair access to our state services and resources. Capabilities, criteria, and tools such as cultural competency, lived experience, and geographic targeting should not be seen as stand-ins for unlawful practices; they are necessary to better understand and serve everyone in our state.

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- For example: Emailing community organizations in a certain geographic area that have historically not been included in your emails is a legitimate way to improve outreach strategies.

Use Targeted Universalism

The State of Washington uses the framework of [targeted universalism](#). Under targeted universalism, **we outline a universal goal, identify the barriers that different people and communities face to reaching that goal, and create targeted strategies to help all groups reach that goal.** This does not mean that we provide benefits to one group in a way that disadvantages another group but instead uplifts all communities through the use of strategies tailored to different needs.

- For example: Washington state has a universal goal of readily accessible public transportation for all Washingtonians and visitors. Some communities may need more buses. Some may need more ferries. Some communities may need more adaptive bicycles for residents with disabilities. To implement the targeted universalism strategy, a city would research what the gaps in accessible public transportation are for different areas and develop effective strategies to fill the gaps that are unique to each area. This does not mean that any community is neglected, but that all communities will receive resources tailored to their needs.

Under the targeted universalism framework, we collect and analyze group-level data to inform how we approach each group so they can fairly access the service or opportunity. We also use data to understand how the state's practices, processes, and policies may be unfairly disadvantaging groups of people and causing them to be farther from the universal goal. First, we meet with different communities across the state to clearly understand what the data means to them and what is needed in their community to address access to resources and opportunity. Then we remove identified unfair practices, processes, and procedures. We also partner with Tribal, nonprofit and community-based organizations, local governments, trusted messengers, and private and philanthropic entities who speak the language of the specific community (where relevant), who know where and how to connect with those groups of people, and who are trusted by those groups of people. These partnerships are critical to meeting the needs of every Washingtonian because these entities have the localized and community-specific knowledge to truly make an impact.

Please consult the [case studies](#) at the end of this document for concrete examples of targeted universalism.

Finally, it is important to note that programs and services may be able to address specific needs for groups that are impacted in ways that intersect with protected status (such as race, gender, and

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disability) depending on the relevant law and legal standards. Please consult with your assistant attorney(s) general regarding your specific factual and legal circumstances.

Reminders

Please check out our previous [guidance](#) for available supports and additional resources.

As you continue your work, be intentional in how you use the methods available to you. Your agency can also seek legal consultation from your assigned AAGs on these topics. Here are a few things to keep in mind. Thank you for your partnership to build a Washington for All.

- Agencies can have organized employee affiliation groups designed to support people with specific experiences. As always, the preferred structure of these groups should be open to all who wish to attend and should provide information about the expectations of behavior for the group that participants are expected to follow.
- Training sessions that address experiences of discrimination or provide information on supporting specific groups are permitted under existing state and federal law. Such trainings can also reduce legal risk and strengthen management practices by educating staff, reducing bias, and fostering belonging. A preferred approach is to make trainings open to all attendees, though in some cases, topical sessions or smaller breakout groups may better serve the purpose and support participants' learning.
- Demographic data can and should still be collected to support the development of targeted strategies, but this data should have a clear purpose and scope of use. This data should be used to inform strategies, not to set numerical or percentage-based quotas.
- Programs that use data related to any protected characteristics should be comparing each characteristic against a clearly articulated "universal goal". For example, if a program seeks to reduce homelessness and unhoused rates and collects data on rates of homelessness for different racial groups, the data should not try to bring Latino or American Indian/Alaskan Native rates of homelessness in line with white rates of homelessness. Instead, the program should seek to bring both groups to the shared universal goal rate using thoughtful strategies.

Case Studies

Addressing Problems in the Hiring Process

We heard from many Washingtonians over the years that some state jobs should not require post-secondary degrees. Based on that feedback and data, [Executive Order 24-04](#) (which builds on previous [legislation](#)) addresses unfair exclusions by focusing on skills, abilities, and competencies.

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Unless a job requires specialized knowledge that can only be obtained through post-secondary education like a medical doctor, registered nurse, electrician, welder, or attorney, we believe people should have the right to fairly compete and demonstrate through the hiring process how they have the ability and skill to do the work, regardless of whether they have a degree. To that end, these policies make Washington's processes fairer for everyone as we implement the above executive order. View the Washington State Office of Financial Management's [Executive Order 24-04 toolkit](#).

Including People with Lived Experience in Agency Decision-making

Perspectives from people with lived experience are critical for state agencies to create policies, processes, and practices that make it easier for people to access the services and benefits that are available to them. These subject matter experts help improve access and make government more effective and efficient.

One real-world example of including people with lived experience is the project that established statewide guidelines to pay community members who participate on state workgroups. The Washington State Legislature recognized the invaluable insights that community members with lived experience bring to state workgroups. They also were aware of barriers to the public in participating in agency decisions, such as the inability to take time off work, find childcare, or pay for transportation costs. To create opportunities for greater participation, in 2022 the Legislature adopted [SB 5793](#) to allow members of certain workgroups to be able to be paid community compensation. EQUITY was charged with developing these guidelines and created a workgroup with state employees and community members who had previously participated on state workgroups (thus having lived experience on this topic).

The participating community members included people who live in rural areas of Washington, those with disabilities, those with children, those from a low-income background, and others. These subject matter experts provided critical insight and expertise during the development of the guidelines and are a strong reason why the [Community Compensation Guidelines](#) are such a critical resource for state agencies implementing the legislation. We have received positive feedback about these guidelines from Washington state agencies, community-based organizations, and organizations/agencies from across the United States.

Improving Access to Internet

Because access to the internet is essential for participating in the economy and supporting our students' education, Washington State government is expanding partnerships with nonprofits, private entities, community-based organizations, local governments, and Tribal governments to ensure every person has reliable high-speed internet, the devices to use it, and the skills to navigate it. Through engagement with Washingtonians across the state, we've learned the following insights, which can help us implement more effective strategies to achieve internet access for all.

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We provide this detailed example to demonstrate the critical information that can only be gained by engaging with different communities and why it is so important to engage with different communities in Washington State. Communities may have different needs so it is important to understand the needs of the specific population so you can develop solutions that meet the need for that population versus a broad strategy that may not be helpful.

Population	Barrier(s)	Need(s)
Tribes	Digital redlining; historic underinvestment; sovereignty and rights-of-way issues; sparse infrastructure; trust concerns	Equitable investments in infrastructure; fiber internet installation not only in cities, but also on Tribal lands; Tribal-led broadband authorities; direct funding to tribes; spectrum access; culturally grounded training; MOUs honoring data sovereignty
Low income	Cost barriers; limited devices; reliance on mobile-only service; Cost of service/devices; data caps; credit checks; unstable housing; limited time for training	Device access; digital navigators for one-on-one support; no-cost/low-cost broadband; device grants and repair; unlimited/adequate data; prepaid/no-credit plans; stipends; flexible, bite-size trainings
Non-Native English Speakers	Language barriers and lack of multilingual resources; English-only portals/support; low awareness; fear of scams	Multilingual support; culturally competent navigators; multilingual outreach (top WA languages); in-language help desks; plain-language UX (simple and clear language in user experience design); community messengers; translated security tips
Black community	Legacy of redlining and underinvestment in broadband infrastructure in historically Black neighborhoods; higher broadband cost burden relative to income; distrust of institutions due to surveillance and discriminatory policing; low representation in tech workforce; gaps in culturally relevant training opportunities	Equitable investments in infrastructure; fiber installation not only in new or wealthy neighborhoods; targeted broadband infrastructure investments in historically under-connected neighborhoods; subsidies that address total cost of access (service + devices); privacy protections and anti-surveillance safeguards; culturally relevant, community-led digital literacy programs; partnerships with Black-owned businesses and CBOs; pathways into tech careers through apprenticeships, internships, and entrepreneurship support

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**Asian American,
Pacific Islander,
Native Hawaiian
(AAPINH)**

Language barriers for limited-English speakers (esp. Vietnamese, Chinese, Korean, Tagalog, Khmer, and other Southeast Asian & Pacific Islander languages); lack of in-language tech support; cultural stigma around asking for help; underrepresentation of Southeast Asian and Pacific Islander communities in broadband planning; immigrant privacy concerns; intergenerational tech knowledge gaps; high broadband access rates for some subgroups (e.g., Indian, Chinese, Japanese Americans) can mask deep gaps for others (e.g., Cambodian, Lao, Hmong, Samoan, Native Hawaiian).; counties like **King, Pierce, Snohomish, and Thurston** have the largest Asian American populations, but needs are often concentrated in **South King County cities** (Kent, SeaTac, Tukwila, Renton, Federal Way).; Language access and digital literacy vary significantly across subgroups, making **disaggregated data** essential to avoid leaving communities behind.

Multilingual outreach in top WA Asian & Pacific Islander languages; broadband infrastructure; community-based digital navigator programs led by trusted API organizations; culturally responsive training (small group, in-language, and hands-on); privacy-first program design; targeted investments in areas with high Southeast Asian & Pacific Islander populations; programs bridging intergenerational tech learning in families

**Disability
community**

Inaccessible platforms/devices; inaccessible sites/apps; lack of AT (assistive tech); poor compatibility; transportation to classes

Universal design; assistive tech; tailored digital skills training; WCAG-conformant services; AT devices & software; one-on-one coaching; captioning/ASL; procurement accessibility requirements

Latino/a/e

Limited-English proficiency (esp. Spanish-dominant or Indigenous-language speakers); low awareness of low-cost programs; immigration-related privacy concerns; rural agricultural work locations; intergenerational tech gaps; reliance on mobile-only access

Culturally and linguistically tailored outreach (Spanish + Indigenous languages); trusted messengers via Latino-serving CBOs; ID-flexible enrollment in broadband programs; mobile-friendly government and service portals; bilingual digital literacy programs for youth and adults; portable connectivity for agricultural and seasonal work; community device lending in Latino-majority areas

LGBTBQ

Safety/privacy concerns; hostile household settings; targeted harassment

Privacy-by-default options; safe community access points; anti-harassment tools; trauma-informed support

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Immigrant and Refugee	Documentation barriers; privacy/surveillance fears; unfamiliar systems	ID-flexible enrollment; privacy-first services; culturally competent training; trusted CBO partners; secure messaging channels
Youth	Device sharing at home; homework connectivity gaps; inconsistent school/home platforms	One-device-per-student with take-home rights; home broadband support; unified platforms; family tech training
College & Technical Students	Housing moves; campus vs. home gaps; specialized software costs	Portable connectivity options; software licenses; campus device banks; evening/weekend support
Small Businesses	E-commerce setup barriers; cybersecurity risk; lack of IT support	Setup “starter packs”; pro-bono clinics; cybersecurity basics; digital marketing coaching; shared studios
Farmworkers	Remote worksites; mobility; employer-controlled housing access	Portable hotspots; field Wi-Fi nodes; multilingual support; durable devices
Veterans	Transition challenges; disability-related access needs; benefits navigation online	Veteran-focused navigators; assistive technology support; benefits portal training; peer groups
Older Adults	Low confidence; fear and targets of scams; accessibility needs; fixed income	Navigators, education, simple safety and security guidelines, accessibility considerations; hands-on, paced training; scam/fraud education; large-print/accessible devices; helplines; home install support
State service users (benefits, health, courts)	Complex portals; account recovery issues; verification hurdles	Unified login; password-less/low-friction IDV; mobile-friendly portals; live chat; in-person digital help
Justice-Impacted	Gaps in IDs/credit; supervised access limits; skills gaps from incarceration	ID alternatives; fee waivers; reentry-focused training; secure devices; record-friendly hiring for IT support roles
Unstably Housed	No stable power/address; device theft/loss; shelter Wi-Fi limits	Charging lockers; rugged/low-cost devices; shelter & library high-capacity Wi-Fi; cloud-stored docs; mail/ID support
Multi-Dwelling Units (MDUs)	Landlord lock-ins; outdated wiring; limited competition	“Right-to-choose” ISP rules; inside-wiring upgrades; bulk affordable plans; building-level Wi-Fi
Rural/remote	Sparse infrastructure; unprofitable markets for ISPs; high service costs; lack of opportunities for digital access to careers, healthcare, banking, etc.; No last-	Broadband expansion, local digital literacy programs; Public investment in middle/last-mile; open-access fiber; service reliability standards; local co-ops; backup power

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mile/middle-mile; poor backhaul; outages;
high install costs

**Urban
Underserved**

Affordability; redlining legacy; building wiring
barriers; device scarcity

Bulk housing broadband; digital navigator programs;
community device libraries; landlord wiring
requirements

**Disaster-Prone
Areas**

Outages; damaged infrastructure;
displacement; fraud and scam vulnerability

Resilient networks (microgrids, satellite failover);
emergency Wi-Fi hubs; device replacement funds;
trusted resource to verify donation efforts

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