

EAT Step 5 Walk-Through — Implementation Planning

IMPORTANT — Scope of this resource: This walks staff through the methodology of the DHS Equity Analysis Toolkit. It does not perform equity analyses. Actual equity analyses are conducted by the appropriate authorities — your Equity Champion, the One DSD Equity Team, or the DHS Equity Director for your work area.

Content

EAT Step 5 Walk-Through — Implementation Planning

Resource type: Tier 1 Flagship — EAT Walk-Through (Methodology Education, Not Analysis)

Adapted from: DHS Equity Analysis Toolkit Guide (Minnesota DHS) — Step 5: Implementation

Library home: L01 EAT Walk-Through Library

Companion to: T02_01 (EAT Overview), T02_05 (Step 4 Strategies), T02_07 (Step 6 Monitor/Evaluate)

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What this step is for

Step 5 is where equity analysis becomes equity action. This walk-through covers the four elements of an EAT implementation plan — strategy, action/task, person responsible, and deadline/resources — along with how to integrate equity considerations into implementation so that the analysis does not end when the planning document is signed.

Plain-language overview

Many equity analyses produce good findings and good strategy recommendations — and then fail in implementation. The plan sits on a shelf. The responsible person changes jobs. The funding does not materialize. The community engagement that informed the analysis does not continue into the implementation phase. The DHS EAT Guide (<https://mn.gov/dhs/>) recognizes this risk explicitly and builds implementation planning directly into the six-step process.

Step 5 asks: Do we have a plan that is realistic, adequately funded, and genuinely accountable?

If the answer to any element is no, the EAT process is not complete. The guide is direct: "If the answer to any question is no, what resources or actions are needed?" Step 5 does not let a team conclude the

analysis without confronting the gap between what the analysis recommends and what the organization is resourced to deliver.

Walk-through (the methodology)

The four elements of an EAT implementation plan

The DHS EAT Guide (<https://mn.gov/dhs/>) specifies four required elements for every implementation plan developed through the EAT:

1. Strategy.

A strategy is the overarching approach — "how you aim to mitigate unintended consequences or expand positive impact." It corresponds to the strategy options developed in Step 4. Each strategy in the implementation plan should be directly traceable to a specific finding from Steps 2–4. If a strategy cannot be traced to a finding, it should not be in the plan.

2. Action/Task.

"Break the strategy into actionable steps." This is where strategy becomes work. Each action should be specific enough that a person reading it knows what to do on Monday morning. "Improve language access" is a strategy; "Translate waiver application form into Somali, Hmong, and Karen with community-based reviewer sign-off by [date]" is an action.

3. Person Responsible.

"Assign clear ownership for each action." Without named ownership, actions become everyone's responsibility and therefore no one's. The person responsible does not have to be the person doing the work, but they must be accountable for ensuring the work is done and for reporting on progress.

4. Deadline and Resources.

"Set dates and describe tools, staffing, budget, and partnerships needed." Deadlines without resources produce unfunded mandates. Resources without deadlines produce drift. Both are required. Resource descriptions should be specific: not "adequate staffing" but "0.5 FTE program coordinator assigned to this implementation from [date] to [date]."

Feasibility testing: the five questions

The EAT Guide requires every implementation plan to pass a feasibility test. The five questions are:

1. Is the plan realistic?
2. Is it adequately funded?
3. Are we adequately resourced with personnel?
4. Are we adequately resourced with mechanisms to ensure successful implementation and enforcement?
5. Are we adequately resourced to ensure ongoing data collection, public reporting, and community engagement?

"If the answer to any question is no, what resources or actions are needed?" This framing is important: a "no" answer is not a reason to abandon the plan. It is a finding that must be resolved — either by securing additional resources, modifying the plan to match available resources, or escalating the resource gap to leadership with a clear equity argument for closing it.

Integrating equity into implementation

Implementation is where equity considerations most commonly erode. The analysis is done; the recommendation is made; now the work is "just implementation." But equity does not sustain itself through default. Implementation must actively maintain equity considerations through:

Ongoing community engagement. The communities whose input shaped the analysis should be part of implementation — not just as recipients of the change, but as participants in monitoring whether the change is working. "Clear and transparent communication throughout implementation" is required by the EAT Guide's community engagement principles.

Accountability structures. The EAT Guide directs teams to share the equity analysis and implementation plan with Equity Directors, Equity Committees, and the communities disproportionately impacted. The Equity Impact Statement should be shared with stakeholders and division/administration leaders and posted on SharePoint. Accountability requires visibility.

Cultural and linguistic responsiveness in implementation. If the equity analysis identified language access barriers, the implementation plan must address language access not just in the final product but in every communication about the implementation — announcements, training materials, feedback mechanisms. Implementation communications that are only in English, about a change designed to improve access for non-English-speaking communities, contradict themselves.

Staff training and preparation. If the change requires staff to understand new eligibility criteria, new documentation alternatives, or new engagement approaches, the implementation plan must include training. Staff who implement a change without understanding its equity rationale are more likely to apply it inconsistently — which can reproduce the disparities the analysis was designed to reduce.

The relationship between Step 5 and Step 6

Step 5 (Implementation) and Step 6 (Accountability, Communication, and Evaluation) are adjacent and interdependent. Step 5 establishes the plan; Step 6 monitors it. But the monitoring mechanisms required by Step 6 must be designed in Step 5. You cannot monitor what you have not planned to measure.

This means the implementation plan developed in Step 5 must include:

- What data will be collected to evaluate whether the implementation is producing the intended outcomes?
- At what intervals will data be reviewed?
- Who is responsible for reviewing data and recommending adjustments?
- How will communities be kept informed of progress and invited to provide feedback?

- What is the course-correction mechanism if implementation is not producing equitable outcomes?

Worked example fragment (anonymized, methodology illustration only)

Continuing the anonymized waiver program scenario:

The Equity Champion develops the implementation plan following strategy selection in Step 4.

Strategy 1: Eliminate income documentation requirement for HCBS waiver eligibility where not legally required.

Action/Task — Person Responsible — Deadline — Resources

Legal review of documentation requirement across all waiver programs — Office of Legal Counsel, with Equity Director support — 60 days from analysis completion — 0.25 FTE OLC staff time
 Policy revision drafted and circulated for public comment — Policy team lead — 90 days from legal review completion — Policy team existing capacity
 Revised eligibility criteria implemented in [case management system] — IT lead + program lead — 30 days after policy adoption — IT project funding: [specific amount]
 Staff training on new eligibility criteria — Training coordinator — Concurrent with system implementation — 4-hour training session; translation of materials into Somali, Hmong, Karen

Feasibility test results:

- Realistic: Yes, with legal review completed first.
- Adequately funded: Partially — IT implementation funding requires budget request.
- Adequately resourced with personnel: Partially — policy team capacity is strained; 30-day delay may be needed.
- Mechanisms for implementation and enforcement: Pending — audit protocol for new eligibility criteria not yet designed.
- Data collection and community engagement: Pending — requires Step 6 monitoring plan.

Resource gap escalation: Budget request for IT implementation funding submitted to division director with equity analysis supporting the request.

This resource walks through methodology only. The actual implementation plan would be developed by the Equity Champion and program leadership.

IS / IS NOT

Step 5 IS — Step 5 IS NOT

Four specific elements: strategy, action, person responsible, deadline/resources — A vague commitment to "work on equity"

A feasibility test with honest answers to five questions — Assumed to be feasible until proven otherwise

An integration of equity into every aspect of implementation — A one-time equity check at the beginning of implementation

A precursor to a measurable monitoring plan (Step 6) — Complete when the plan document is signed
Shared with stakeholders and posted for accountability — An internal document that only the implementation team sees

Common questions

What if the implementation plan reveals that the resources required are not available?

Document the gap and escalate. The EAT framework does not expect every analysis to produce a fully funded implementation plan on day one. It does expect the gap to be named clearly and presented to leadership with the equity argument for closing it. An equity analysis that stops at "we can't afford it" without escalating the resource gap is not complete.

Who approves the implementation plan?

The Equity Director for your work area reviews and approves the equity-related elements of the implementation plan. The division director or other appropriate leader approves the plan for operational implementation. Both approvals are required.

What happens if the person responsible leaves before implementation is complete?

This is a real risk and should be named in the plan. A transition protocol — who assumes responsibility, how implementation continuity is maintained, what documentation exists — should be part of the plan. Equity analyses that depend on one person's institutional memory are fragile.

Connection to DSD goals

DSD's six organizational goals can only be advanced through sustained implementation. The EAT's implementation planning step is the bridge between analysis and action — between the commitment to equity and the work of achieving it. Without a rigorous, accountable Step 5, the best analysis in the world produces no change for the communities DSD serves.

When to escalate / where to refer

- If resource gaps identified in the feasibility test cannot be resolved within the program area: escalate to division director with equity analysis.
- If the implementation timeline creates a gap between analysis completion and community-facing change that is too long: consult your Equity Director about interim strategies.
- If staff training is needed to implement the equity-related changes: contact DSD training staff and the CECLC for appropriate training development support.

Reflective questions

1. Think of a change your program area implemented in the last year. Did it have a named person responsible for every action? A deadline with resources? If not, what happened?

2. What does "realistic" mean when an equity analysis recommends a change that the program area cannot currently fund? Who gets to decide?
3. How does your program area currently communicate implementation updates to the communities affected by a change? Is that communication accessible to communities with limited English proficiency?
4. What monitoring mechanisms are already built into your program area's work? How could they be adapted to track equity-related implementation progress?
5. What is the difference between an implementation plan that integrates equity throughout and one that checks equity at the beginning and then proceeds as normal?

Sources

- DHS Equity Analysis Toolkit Guide — Minnesota DHS (<https://mn.gov/dhs/>) (primary source, Step 5)
- Racial Equity Impact Assessment Guide — Race Forward (https://www.raceforward.org/sites/default/files/RacialJusticeImpactAssessment_v5.pdf) (section 9: ensuring viability and sustainability)
- King County Equity Impact Review — Phase 4: Implement (https://blog.homelessinfo.org/wp-content/uploads/King-County-Equity-Impact-Review-checklist_Mar2017.pdf)
- Racial Equity Toolkit — GARE, via Othering and Belonging Institute (https://belonging.berkeley.edu/sites/default/files/ARCHIVE/gare-racial_equity_toolkit.pdf)
- One DSD Program Charter v1.1 (one-dsd-program-charter)

Always defer to the person in front of you.

Ask: Is the plan realistic?

Ask: Is it adequately funded?

Ask: Are we adequately resourced with personnel?

Ask: Are we adequately resourced with mechanisms to ensure successful implementation and enforcement?

Ask: Are we adequately resourced to ensure ongoing data collection, public reporting, and community engagement?

Ask: What data will be collected to evaluate whether the implementation is producing the intended outcomes?

Ask: Who is responsible for reviewing data and recommending adjustments?

For all staff, use EAT Step 5 Walk-Through — Implementation Planning to define the decision, compare evidence and impacts, document limits, and name the owner; use the guidance in the immediate task, check impact and access, and ask for help when authority is unclear. Start by ask: Is the plan realistic?

Do not replace official legal, policy, clinical, supervisory, program, or Tribal authority.

Do not infer an individual's identity, preferences, needs, or experience from group-level information.

State uncertainty, use current authoritative sources, and escalate when the decision exceeds the user's role.

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