



RE: Department of Energy, 48 C.F.R. 970.5226-1, “Diversity Plan.”

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Dear Agency:

Thank you for the opportunity to comment on the possible rescinding of 48 C.F.R. 970.5226-1, “Diversity Plan.” I am a professor of sociology with over 20 years of experience researching racial and gender inequality in professions. As such, I am writing to offer a comment on America First’s request that the Department of Energy (DOE) cease requiring diversity plans from management and operating contractors.

As a social scientist, I urge you to rely on the relevant data and evidence about diversity in organizations in making your decision. Research shows that organizational diversity boosts innovation and effective problem-solving, characteristics which would seem to benefit the DOE’s goal of advancing energy security and promoting scientific innovation (Turi et al 2022). Thus, the question becomes not whether the DOE should expect managers and operating contractors to encourage diversity, but whether diversity plans are the most effective mechanism for achieving this goal.

Research that examines mechanisms for increasing diversity yields two outcomes that are particularly relevant to the DOE’s objectives (Dobbin and Kalev 2013, 2022). One: when organizations diversify effectively, they focus on expanding opportunities for many different groups of workers—people of color, but also women of all races, veterans, neurodivergent employees, those with visible and invisible disabilities, and more (Wingfield 2026). Ensuring that the DOE is working with companies that employ a broad spectrum of workers could potentially help meet key goals-- for example, developing effective methods for enhancing clean energy use in rural areas or identifying ways a modernized energy grid could assist disabled communities. Bringing more workers from a variety of backgrounds into contact with the DOE and ensuring that they have opportunities to thrive and advance can help achieve agency priorities. Two: organizations can use legal, evidence-based strategies that have been shown to create opportunities for more workers. Approaches such as expansive recruitment strategies, mentoring programs for all, and flexible work arrangements have a documented impact on workers by enhancing hiring, advancement, and organizational growth (Dobbin and Kalev 2022).

From this data, we can draw two conclusions. One is that diversity plans in and of themselves are not necessarily sufficient. If management and operating contractors submit plans that rely on ineffective strategies, these aren’t likely to help the DOE achieve the benefits diversity can offer. But the second conclusion we can draw is that if managers and operating contractors submit plans indicating they intend to use evidence-based approaches for creating more organizational diversity, the DOE could potentially benefit significantly from innovative new ideas that advance its mission and goals.

As a federal government agency, the DOE has an opportunity to set a powerful example. By ensuring that contractors and managers do not simply have diversity plans but require companies with whom they work to use evidence-based strategies for diversifying, the Department can be a leader to other businesses and

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organizations in both the public and private sector. Not only that, the DOE can embody its commitment to using science and data to make decisions—both about energy security and the processes that lead to it.

References

Dobbin, Frank, and Alexandra Kalev. 2013. "The Origins and Effects of Corporate Diversity Programs." Pp. 253–81 in *Oxford Handbook of Diversity and Work*, edited by Q. Roberson. Oxford, UK: Oxford University Press.

Dobbin, Frank, and Alexandra Kalev. 2022. *Getting to Diversity: What Works and What Doesn't*. Cambridge, MA: Harvard University Press.

Turi, Jamshid A., Sudhaishna Khastoori, Shahyra Sorooshian, and Nadine Campbell. 2022. "Diversity Impact on Organizational Performance: Moderating and Mediating Role of Diversity Beliefs and Leadership Expertise." *PLoS One* 17(7):e0270813 (<https://doi.org/10.1371/journal.pone.0270813>).

Wingfield, Adia Harvey. 2026. "After DEI: A Different Future for Race, Work, and Policy." *American Sociological Review* 91 (1): 1-18.