



# Race, Ethnicity, Language, Disability, and Tribal Affiliation Demographic Data Standards

*Administrative Rule Adopted by the Office of Equity and Human Rights Pursuant to Rule-Making Authority Portland City Code 3.128.040*  
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## Applicability

This rule applies to all City of Portland staff when collecting demographic information about the public. Examples of the public may include, but are not limited to, people accessing City services or programs, people participating in community engagement with the City, and people working in partnership with the City through contracts or grants. These rules do not apply to internal City of Portland employee data collections which follow methods established by the Bureau of Human Resources.

Where preempting demographic data standards apply, those existing standards should be used. Documentation of those existing standards must be maintained and when possible mapped to the standards defined in this rule. This ensures goals of comparability and improved data quality with the demographic data standards in this rule. See the parallel guidance for more details.

## Purpose

These rules establish uniform standards and practices for City staff when collecting and reporting data relating to the race, ethnicity, language, disability, and tribal affiliation of the public. Distinct racial, cultural, and linguistic communities and those living with disabilities experience inequities. Collecting and analyzing demographic data is vital to inform decisions and effectively provide services to Portland's changing population. Standardized methodology improves the ability to recognize, target, and eliminate disparities. This rule contributes to our ability to measure progress towards equity goals and support community outcomes.

Local, state, and national best practices inform these standards. Parallel guidance emphasizes privacy protection and other important considerations when using the standards. Uniform standards support more efficient data management and analysis. These methods also establish clear expectations for communities when providing data to the City. Resulting information from more robust analyses allows for comparisons to local and national trends.

Standardized, disaggregated data is necessary to improve the City's policymaking, quality service and program delivery, and equitable resource allocation strategies. Institutionalizing these practices helps the City achieve a range of equity, justice, and Civil Rights goals and reporting requirements. These standards allow the City to better work with and respond to communities.

## Authority

[Code Section 3.128.040](#) authorizes the Office of Equity to adopt rules and procedures for civil rights compliance and to promote equity and reduce disparities within City government. The City Data Governance Committee (Ordinance No. 188356) has approved and adopted these demographic data standards.

## Related Policies

[ADM-18.30- Citywide Racial Equity Goals and Strategies](#)

[ADM-18.32- Civil Rights Title VI and ADA Title II Compliance](#)

[BTS-2.01- Information Security Administrative Rule, Subsection 18- Information Classification, Protection, and Sharing](#)

[HRAR-1.03- Public Records Information, Access and Retention](#)

[HRAR-4.08- Information Technologies, category: Employee Behavior & Expectations](#)

[HRAR-11.04- Protection of Restricted and Confidential Information](#)

[Resolution 37437 Establish Privacy and Information Protection Principles for how the City collects, uses, manages, and disposes of data and information](#)

## Definitions

The definition of race and ethnicity, language, disability, and tribal affiliation categories are sensitive and complex. The collection of such data for the public good is a serious responsibility. This policy is based in part on the [US Federal Office of Management and Budget \(OMB\) Directive No. 15](#). This directive states “The categories in these standards are understood to be socio-political constructs and are not an attempt to define race and ethnicity biologically or genetically.”

1. **American Indian, Alaska Native, or Indigenous Peoples of the Americas:** is a demographic category that includes individuals who identify with or descend from any of the original peoples of North, Central, or South America. This includes,
  - a. Individuals who identify as American Indian, Native American, or Alaska Native
  - b. "Indians" or "Indian", defined as any person who is a member of an Indian Tribe, such terms mean any individual who
    - i. is a member of a tribe, band, or other organized group or community including pueblos, racherias, colonies, and any Alaska Native Village, or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688) [43 U.S.C. 1601 et seq.], including those tribes, bands, or groups terminated since 1940, those federally recognized, and those recognized now or in the future by the State in which they reside, or who is a descendant, in the first or second degree, of any such member, or
    - ii. is considered by the Secretary of the Interior to be an Indian for any purpose or determined to be an Indian under federal regulations.
  - c. A member of the Indigenous People of Canada and Latin America, or with origins in any of the original peoples of North America, including Canada and, Mexico, Central America, and South America.

Examples could include but are not limited to Athabaskan, Blackfeet Tribe, Confederated Tribes of the Grand Ronde, Mayan, Nahua, Native Village of Barrow Inupiat Traditional Government, Navajo/Diné, Nez Perce, Osage, Tlingit, Wasco, etc.

2. **American Indian or Alaska Native Tribal Affiliation:** refers to the status of an individual who is a member of an Indian Tribe.
  - a. Unless otherwise designated, such terms mean any individual who is a member of a tribe, band, or other organized group or community including pueblos, rancherias, colonies, and any Alaska Native Village, or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688) [43 U.S.C. 1601 et seq.], including those tribes, bands, or groups terminated since 1940, those federally recognized, and those recognized now or in the future by the State in which they reside, or who is a descendant, in the first or second degree, of any such member.
  - b. Indian Tribe means any Indian tribe, band, nation, or other organized group or community, including pueblos, rancherias, colonies, and any Alaska Native village or regional or village corporation as defined in or pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688) [43 U.S.C. 1601 et seq.], which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians; and having powers of self-government. This includes the political status afforded to tribal citizens via rights retained by tribal governments through treaty agreements. The United States has a unique, legally affirmed Nation-to-Nation relationship with American Indian and Alaska Native Tribal Nations, recognized under the Constitution of the United States, treaties, statutes, Executive Orders, and court decisions. The United States recognizes the right of Tribal governments to self-govern and supports Tribal sovereignty and self-determination (87 F.R. 74479).
  - c. Is considered by the Secretary of the Interior to be an Indian or Indian Tribe for any purpose, determined to be an Indian or Indian Tribe under any regulations, or that the Secretary of the Interior (Secretary) acknowledges to exist as an Indian Tribe pursuant to the Federally Recognized Indian Tribe List Act of 1994, 25 U.S.C. § 5131.
3. **Appropriate, feasible, and safe:** describes the minimum conditions for data collection security and quality. This begins with having a clear use for the data. Data must be collected and stored in a way that ensures quality and allows for meaningful analysis. Data must be collected and published in a way that ensures anonymity of individuals. This involves consideration of Federal, State, and City policies and rules related to privacy, public records, and information security. Impacts of sample size and the context of all data points collected together, including other demographic fields, are also key factors in safe and appropriate data collection and analysis. Refer to the parallel guidance for more details and examples.
4. **Asian:** is a demographic category that includes all individuals who identify with or descend from any of the original peoples, nationalities, or ethnic groups of East Asia, Southeast Asia, or the Indian Subcontinent. Examples of these groups could include but are not limited to Asian Indian or East Indian, Bengali, Cambodian, Chinese, Filipino, Hmong, Japanese, Korean, Mien, Pakistani, Thai, Vietnamese, etc.
5. **Black or African American:** is a demographic category that includes all individuals who identify with or descend from any of the original peoples, nationalities, or ethnic groups of the Black

racial groups of Africa. Examples of these groups could include but are not limited to African American or Black, Bahamian, Barbadian, Ethiopian, Ghanaian, Haitian, Jamaican, Kenyan, Liberian, Nigerian, Somali, South African, etc.

6. **Bureau:** a bureau, division, department, office, or other organizational unit within the City of Portland.
7. **City:** the City of Portland.
8. **Disability:** is a demographic designation that includes all people having, living with or experiencing a disability or disabilities.
  - a. Also defined under ORS 659A.104; Section 504 of the Rehabilitation Act, or the Americans with Disabilities Act of 1990.
9. **Ethnicity:** is a demographic designation for a group of people sharing a culture that includes race, religion, language, and other cultural characteristics including ancestry or country of origin. Ethnicity is a fluid, sociopolitical construct.
10. **Hearing:** is a demographic category that includes all individuals who identify as being Deaf, deaf, hard of hearing, or any other condition that requires sound amplification or captioning for full understanding.
11. **I prefer not to answer:** is a demographic designation used when the individual affirmatively indicates they will not provide information on their race or ethnicity, language, disability, or tribal affiliation.
12. **Intellectual, Developmental, Cognitive:** is a demographic category that includes all individuals who identify as living with a developmental, cognitive, or intellectual disability. Examples could include but are not limited to people who live with brain injury, Downs Syndrome, and dementia.
13. **Invisible:** is a demographic category that includes all individuals who live with disabilities that can limit their ability to perform one or more tasks of daily living but who are often overlooked in disability data collection because they may appear not to have a disability, or their disability is not always actively limiting them. Examples could include but are not limited to individuals who live with chronic illnesses and/or chronic pain (e.g. HIV, Cancer, Fibromyalgia, Diabetes, a seizure disorder, or colitis).
14. **Latino/a/e/x or Hispanic:** is a demographic category that includes all individuals who identify with or descend from any of the original peoples, nationalities, or ethnic groups of Mexico, Puerto Rico, Cuba, Central and South America, and other Spanish cultures. Examples of these groups could include but are not limited to Colombian, Cuban, Dominican, Ecuadorian, Guatemalan, Honduran, Mexican or Mexican American, Nicaraguan, Peruvian, Puerto Rican, Salvadoran, Spaniard, Venezuelan, etc.
15. **Mental Health:** is a demographic category that includes all individuals who identify as living with a mental health disability. Examples could include but are not limited to people who live with bi-polar disorder, depression, PTSD, Schizophrenia, etc. which affects their mood, behavior, and

thoughts. These effects may interfere with a person's ability to make and maintain meaningful relationships, to care for themselves, and to carry out daily life functions (work, school, etc.).

16. **Middle Eastern or North African:** is a demographic category that includes all individuals who identify with or descend from any of the original peoples, nationalities, or ethnic groups of the Middle East or North Africa. Examples of these groups could include but are not limited to Algerian, Assyrian, Chaldean, Egyptian, Imazighen, Israeli, Iranian, Iraqi, Kurdish, Lebanese, Moroccan, Palestinian, Syrian, Tunisian, etc.
17. **Mobility or other Physical Disabilities:** is a demographic category that includes all individuals who have disabilities that impact the ability to navigate physical environments some or all of the time. This includes all individuals who use mobility devices such as walkers, wheelchairs, scooters, crutches, and canes as well as people who would require assistance entering or evacuating a building with stairs.
18. **Native Hawaiian or Pacific Islander:** is a demographic category that includes all individuals who identify with or descend from any of the original peoples, nationalities, or ethnic groups of Hawaii, Guam, Samoa, or other Pacific Islands. Examples of these groups could include but are not limited to Carolinian, Chamorro, Chuukese, Fijian, Marshallese, Native Hawaiian, Palauan, Pohnpei an, Samoan, Tahitian, Tongan, Yapese, etc.
19. **Neurodivergence:** is a demographic category that includes all individuals who face barriers due to systems and processes that are not easily navigable for a nontypical brain. Neurodivergence affects all parts of an individual's life, including levels of sociability, learning, sensory stimulation, memory, and information processing.
20. **Not listed above, please describe:** is a demographic designation that includes individuals who identify with a demographic designation not listed and is given an option to write their answer in.
21. **Race:** is a demographic designation for a group of people with shared ancestry, national origin and sociocultural characteristics. Race is a fluid, sociopolitical construct. Race is not a biological, anthropological, or genetic distinction.
22. **Speech or Communication:** is a demographic category that includes all individuals who identify with having speech or communication disabilities. This can include difficulty with speech and verbalization or being understood.
23. **Visual:** is a demographic category that includes all individuals who identify as being blind or having low vision.
24. **White:** is a demographic category that includes all individuals who identify with or descend from any of the original peoples, nationalities, or ethnic groups of Europe. Examples of these groups could include but are not limited to Albanian, Cajun, English, Dutch, French, German, Irish, Italian, Norwegian, Polish, Roma, Slavic, etc.

## Demographic Data Collection Standards Policy

1. Where appropriate, feasible, and safe, the City and its employees should include demographic questions when collecting data from the public. Race, ethnicity, language, disability status, and American Indian or Alaska Native tribal affiliation data should be considered when designing data collection. When collecting this data City staff shall do so in accordance with this rule, the parallel guidance, and related policies.
2. Where appropriate, feasible, and safe, contractors, subcontractors, and grantees working on behalf of the City should include demographic questions when collecting data from the public. Race, ethnicity, language, disability status, and American Indian or Alaska Native tribal affiliation data should be considered when designing data collection. When collecting this data, contractors, subcontractors, and grantees working on behalf of the City shall do so in accordance with this rule, parallel guidance, and related policies.
3. To the greatest extent possible, the City and City contractors, subcontractors, and grantees should ask individuals to self-report race, ethnicity, preferred language, disability status, and American Indian or Alaska Native tribal affiliation information.
  - a. Staff shall not assume or judge ethnic and racial identity, race, preferred language, disability, or American Indian or Alaska Native tribal affiliation, except as mandated by state or federal reporting requirements.
  - b. Individuals have the right, and shall be offered the option, of selecting or providing one or more (multiple) racial or ethnic, language, disability, and American Indian or Alaska Native tribal affiliation designations or responses.
4. An individual has a right to decline to answer any or all demographic questions and all questions shall include the option of “I prefer not to answer.” All “prefer not to answer” or missing demographic information will be identified and recorded in the data collection instrument for analysis.
5. Privacy and confidentiality must be considered when collecting demographic information. All records prepared, owned, used, or retained by the City are considered public records under state law and may be subject to disclosure. Certain demographic data may not be exempt from disclosure. Thus, demographic data should be collected separately from other personally identifiable information. Nevertheless, there may be scenarios where demographics can be used to identify a person. City employees will seek to understand the risks and impacts of demographic data collection and adjust their data collection practices accordingly. See the parallel guidance for more details and example of a disclosure statement.
6. City employees must adhere to the Privacy Principles (Resolution 37437), BTS-2.01 (“Information Security Administrative Rule”), and BHR-4.08 (“Information Technologies”) when collecting and using demographic data. This includes responsible stewardship throughout the full life cycle: collection, storage, use, maintenance, management, processing, publication, transfer, retention, and disposal. Implementing these practices and sharing responsible data management practices is key to building trust when asking the public to share data.

7. Requests for demographic information shall be distinct from questions related to program eligibility criteria and an individual's decision not to answer questions related to demographic data shall not affect eligibility for public programs. This may not apply in very limited instances when tribal affiliation and sovereign rights are required for eligibility.
8. This administrative rule includes minimum standards as well as expanded standards to establish uniform practices for granular levels of demographic data collection and reporting.
9. The City and City contractors, subcontractors, and grantees may adhere to alternative standards to comply with differing data collection and reporting requirements such as federal, state, or grant standards that preempt these standards. Documentation of alternative required standards should be maintained by staff managing data collection and analysis. When questions arise about existing or differing standards, staff can contact Office of Equity for further implementation guidance.
10. These data standards for race, ethnicity, language, disability, and tribal affiliation represent minimum standards. The standards are not intended to limit the collection of needed data or levels of detail. Efforts to collect more detailed data should adhere to all other data and privacy guidelines, policies and these standards. For example, efforts should be made so that open-ended answers or other data with increased granularity can be aggregated to the formats in the standards for analysis and reporting.
11. The minimum and expanded race and ethnicity standards in these rules are designed to aggregate to existing federal reporting categories.
12. Nondiscrimination and meaningful access statements must be included when collecting demographic data. These are required as part of Civil Rights Compliance and ensures equitable access and participation in data collection efforts.
13. When implementing these standards, describing the purpose of the data collection to the public, including why we ask about demographics in connection to equity, is highly recommended. This provides transparency on the planned uses of the data and better informs the public before they decide how they would like to participate.
14. For further implementation guidance and examples related to this policy, see the parallel guidance document.

## Race and Ethnicity Demographic Data Collection Standards

**Those covered by this policy must adhere to the minimum standards listed below:**

1. Minimum Race and Ethnicity Data Standards:

Which of the following describes your racial or ethnic identity? Please select ALL that apply.

- American Indian, Alaska Native, or Indigenous Peoples of the Americas
- Asian
- Black or African American
- Latino/a/e/x or Hispanic



- Middle Eastern or North African
- Native Hawaiian or Pacific Islander
- White
- Not listed above, please describe\_\_\_\_\_
- I prefer not to answer

2. Where appropriate, feasible, and safe, City staff and City contractors, subcontractors, and grantees may elect to collect more detailed racial and ethnic information using these Expanded Race and Ethnicity Data Standards:

Which of the following describes your racial or ethnic identity? Please select ALL that apply.

American Indian, Alaska Native, or Indigenous Peoples of the Americas:

- American Indian
- Alaska Native
- Canadian Inuit, Metis or First Nation
- Indigenous Mexican, Central or South American

Asian:

- East Indian
- Cambodian
- Chinese
- Communities of Myanmar
- Filipino/a
- Hmong
- Korean
- Japanese
- Laotian
- South Asian
- Vietnamese
- Other Asian

Black or African American:

- African American or Black
- African (Black)
- Afro-Caribbean
- Other Black

Latino/a/e/x or Hispanic:

- Mexican
- Central American
- South American
- Other Latino/a/e/x or Hispanic

Native Hawaiian or Pacific Islander:

- Native Hawaiian
- Chamorro
- Marshallese
- Micronesian
- Samoan
- Tongan
- Other Pacific Islander

Middle Eastern or North African:

- Middle Eastern
- North African

White:

- Eastern European
- Western European
- Slavic
- Other White

Not listed above, please describe \_\_\_\_\_

I prefer not to answer

## Language Demographic Data Collection Standards

1. Minimum Language(s) Spoken or Signed at Home Data Standard:

Language(s) spoken or signed at home:

- \_\_\_\_\_
- I prefer not to answer

2. Where appropriate, feasible, and safe, City staff and City contractors, subcontractors, and grantees may elect to collect more detailed language information. Expanded Language Data Standards include:

Language(s) spoken or signed at home:

- \_\_\_\_\_
- I prefer not to answer

How well do you speak English?

- Very Well
- Well
- Not Well
- Not at All
- Don't know
- I prefer not to answer

3. To the greatest extent practicable, City staff and City contractors, subcontractors, and grantees gathering language data shall ask open-ended questions designed to elicit an unprompted response related to spoken or signed languages.
  - a. If a list of answer options is provided, the standards should, at a minimum, include [City of Portland's Language List](#), English, American Sign Language, "Not listed above, please describe" with space for the respondent to write in or provide their specific language, and "I prefer not to answer".

## Disability Demographic Data Collection Standards

### 1. Minimum Disability Data Standards:

Do you identify with having or living with a disability?

- Yes
- No
- I prefer not to answer

If yes, please describe the nature of your disability. Select ALL that apply:

- Mobility or other physical disabilities
- Visual
- Hearing
- Intellectual, Developmental, Cognitive
- Speech or Communication
- Mental Health
- Neurodivergence
- Invisible
- Not listed above, please describe: \_\_\_\_\_
- I prefer not to answer

2. Where appropriate, feasible, and safe, City staff and City contractors, subcontractors, and grantees may elect to provide and collect more detailed disability and access information using the Expanded Disability Data Standards. These categories are designed to align with the Minimum Disability Data Standards. Expanded Disability Data Standards:

Do you identify with having or living with a disability?

- Yes
- No
- I prefer not to answer

Do you find it challenging to access City events, programs, or services due to of lack of accessibility or a need for additional support?

- Yes
- No
- I prefer not to answer

If yes, please describe the nature of your need for additional access. Select all that apply:

- Mobility or other physical (Do you have serious difficulty walking, standing, sitting, or climbing stairs?)
- Visual (Do you have serious difficulty seeing. Do you use a screen reader, large print etc.?)
- Hearing (Do you have difficulty hearing, do you use sign language, live captions, etc.?)
- Intellectual, Developmental, Cognitive (Do you have difficulty concentrating, remembering, understanding, or making decisions?)
- Speech or Communication (When using your usual language, do you have difficulty communicating?)
- Mental Health (Do you have difficulty with mood, behavior, or thinking even with medication?)
- Neurodivergence (Do you have difficulty due to sensory, social, or information processing?)
- Invisible (Do you have a disability that is not readily apparent by your general appearance)
- Not listed above, please describe: \_\_\_\_\_
- I prefer not to answer

## American Indian or Alaska Native Tribal Affiliation Data Collection Standards

1. This demographic information is about sovereignty and associated rights/benefits, not specifically race and ethnicity.
2. Minimum American Indian or Alaska Native Tribal Affiliation Data Standards:

Are you an enrolled member, and/or a descendant, of a Federal or State recognized American Indian Tribe or Alaskan Native Village/Corporation? Mark and describe all that applies.

- Enrolled Member. Tribal Affiliation(s): \_\_\_\_\_
  - Descendant. Tribal Affiliation(s): \_\_\_\_\_
  - I am not an enrolled member or descendant of a federally or state-recognized American Indian Tribe or Alaska Native Village Corporation.
  - I prefer not to answer
3. Where possible, City staff and City contractors, subcontractors, and grantees gathering demographic data from an individual shall ask open-ended questions designed to elicit an unprompted response related to American Indian or Alaska Native Tribal Affiliation.

## Administration and Implementation

1. The Office of Equity, in collaboration with bureau partners, may create and implement shared or parallel definitions, policies, procedures and practices that expand on the minimum criteria of these rules.
2. The Office of Equity in partnership with the City Data Governance Committee will continue to provide implementation guidance and support for:
  - a. Collecting data in consistent, meaningful, culturally competent ways.

- b. Protecting client privacy in compliance with state and federal law.
  - c. The addition of demographic data categories for the collection of more accurate and comprehensive data.
  - d. Education and communication materials.
- 3. The Office of Equity shall assess use of these standards by City employees as part of Civil Rights Compliance monitoring and reporting.
- 4. The Office of Equity and City Data Governance Committee, in collaboration with the bureau stakeholders, shall review the standards every three years to ensure the standards are up to date, efficient, uniform and consistent with best, promising and emerging practices.