OFFICE of EQUITY and HUMAN RIGHTS
CITY OF PORTLAND

Commissioner in Charge:
Carmen Rubio

Bureau Director:
Lisa Watson

Civil Rights Title VI, Language Access, and ADA Title II Annual Program Update

Office of Equity and Human Rights Supplemental Report prepared for City and Bureaus to support State and Federal Reporting

Fiscal Year 2021-2022

Contents

Introduction

In accordance with Title VI of the Civil Rights Act of 1964, the City of Portland assures that no person, on the grounds of race, color, national origin, and limited English proficiency (LEP), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any of its programs or activities, whether they are federally funded or not.

Many federal and state agencies, including the Oregon Department of Transportation (ODOT) require recipients of federal aid and funds to submit an annual accomplishment report to ensure compliance with Title VI of the Civil Rights Acts of 1964. The following supplemental report from the Office of Equity includes FY 2021-2022 (July 1, 2021, through June 30, 2022) activities and highlights:

- Changes or updates such as identification of key staff with Civil Rights Title VI or ADA Title II-related functions within the City and Office of Equity.
- Summary of the administrative structure and internal controls guiding the City in compliance.
- Activities and accomplishments including the development and implementation of internal controls, guidance, staff training, information related to discrimination complaints, and other compliance activities.
- Upcoming plans for the next federal reporting year including city- and Office of Equity-specific Title VI plans and goals.

City of Portland Title VI Statement

The City of Portland Civil Rights Title VI policy statement was established in the [2013 City of Portland Civil Rights Title VI Plan](#) and is as follows:

It is the policy of the City of Portland that no person shall be excluded from participation in, denied the benefits of, or be subjected to discrimination in any City program, service, or activity on the grounds of race, religion, color, national origin, English proficiency, sex, age, disability, religion, sexual orientation, gender identity, or source of income. The City of Portland also requires its contractors and grantees to comply with this policy.

Office of Equity and Human Rights

The Office of Equity and Human Rights was born out of a vision from community and leaders in Portland that the City government have an office where there was an intentional effort to advance equity in all City services and supports. As such, the Office of Equity spent the better part of six years providing policies and structures that focused on the internal operationalizing of equity with community support.

The Office of Equity and Human Rights was created by City Ordinance in 2011 and charged to:

1. Promote equity and reduce disparities within City government;
2. Provide guidance, education and technical assistance to all bureaus as they develop sustainable methods to build capacity in achieving equitable outcomes and service;
3. Work with community partners to promote equity and inclusion within Portland and throughout the region, producing measurable improvements and disparity reductions;
4. Support human rights and opportunities for everyone to achieve their full potential;
5. Work to resolve issues rooted in bias and discrimination, through research, education, and interventions.

Mission

The Office of Equity and Human Rights leads the City of Portland's commitment to equity. We hold the City accountable by developing policies, practices, and procedures that strive to dismantle systems of oppression and build equitable foundations for our most systemically oppressed communities. We center race and disability through education and analysis. Individuals experience multiple forms of oppression; thus, we drive equity with an intersectional framework.

Vision

A Portland City Government that,
- Acknowledges and is accountable to redress the harms of systemic oppression, anti-Blackness, and systems of white supremacy.
- Uses language that directly names the communities who experience systemic oppression—communities that are not reduced to acronyms.
- Creates and maintains spaces in Portland that are clean, safe, open, and free to community.
- Ensures Black, Indigenous, and other individuals of color enter Portland spaces every day without fear, anxiety, and/or uncertainty about whether they will return and whether their families are safe.
- Guarantees Black, Indigenous, and other individuals of color and those with disabilities have shelter—a safe place to return to at the end of each day.
- Assures Black people are not subject to, because of anti-Black racism, unjustified arrests and police violence.

Equity Stance

Equity addresses the historic, institutional systems that create oppression based on identity. We strive to use an intersectional approach to transform historic power dynamics for accountable systemic change based on the principles of humanity, justice, and belonging.

City of Portland Equity and Civil Rights Administration and Approach

As a recipient of federal, state, and regional funding, the City of Portland is institutionally responsible for and committed to the intent, obligation, objectives, and provisions of Civil Rights Title VI and related statutes, regulations, and intersecting initiatives including Environmental Justice (EO 12898), Language Access (EO 13166), and Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (EO 13985).

The City has affirmed its individual commitment and broadly replicated provisions within city policy. The City's Title VI mandate and commitments extend to all the City's services, bureaus, and offices. Operating responsibly, the City of Portland strives to meet the highest ideals for socially just and equitable decision-making, engagement, service delivery, and impacts. In doing so, the City considers Civil Rights Title VI as a legal underpinning, a component of, and under the scope of racial justice, social equity, and justice.

The City of Portland, therefore, employs an integrated and aligned approach to equity, justice, and Civil Rights Title VI administration. To fully achieve, sustain, and uphold Title VI, the City is responsible for taking proactive, affirmative, deliberate, and institutional steps to,
- assure inclusive, accessible, meaningful participation and engagement,
- foster, provide, and promote equitable benefits of government,
- safeguard, drive, promote, and ensure equitable and just impacts, outcomes, treatment, opportunities, and nondiscrimination for everyone in all aspects of its public decision-making, planning, investments, programs, services, and activities.

Our Title VI compliance administration and activities centers on developing and implementing institutional equity, racial justice, environmental justice, and accountability strategies and systems. As a component encompassed within the larger equity umbrella, City Civil Rights Title VI administration, concentrates oversight, efforts, and activities on operationalizing equity and justice in the City's existing and future public planning, decision-making, and investments. We recognize this work must be done in partnership with community, across systems, and across the whole of government, and we pursue a coordinated and comprehensive approach to,
- affirmatively advance equity and civil rights through government
- support and engage underserved and underrepresented communities
- ensure the equitable delivery of benefits, services, and opportunities
- address and eliminate disparities and barriers to access and benefits
- promote equitable outcomes
- to make progress on our goals of creating a just and equitable Portland

Racial Justice Work within the City of Portland (Civil Rights Title VI focus/overlap identified in orange)
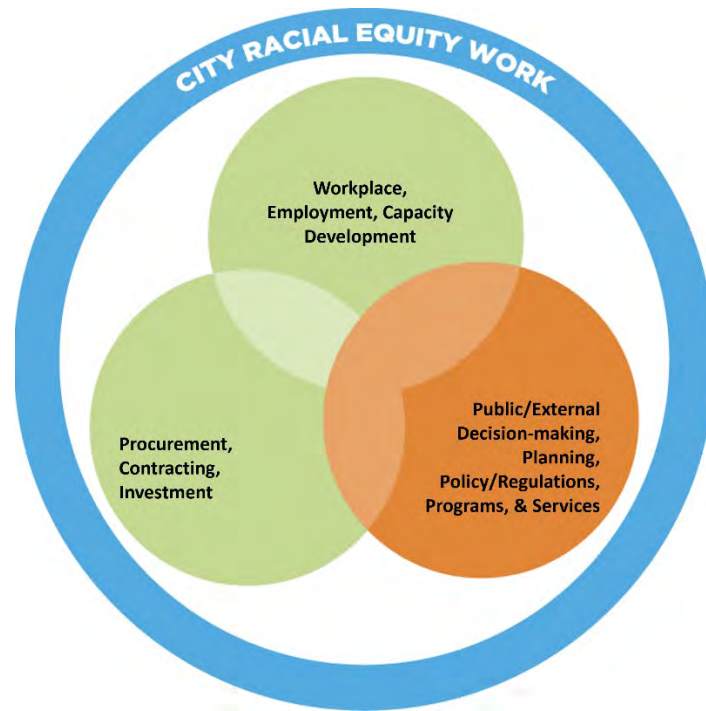
Image 1: Venn diagram demonstrating the focus and applicability of the City's Civil Rights Title VI work within different fields of racial equity work – City and Office of Equity Title VI administration focus and aligns most with public decision making, services, and impacts.

Racial Equity and Civil Rights Title VI administration, housed in the Office of Equity and Human Rights directs, develops, and manages the Citywide Civil Rights Title VI administration and related equity and justice functions or efforts. The program leads the work, citywide, and spearheads institutional alignment with the goals, objectives, intent, provisions, and regulations of Civil Rights Title VI, in an integrated approach furthering racial equity and justice. The program team is responsible for providing citywide strategic innovations on equity tools necessary to achieve the City's adopted equity goals, civil rights policies, and bureaus' equity and Title VI plans. The program is responsible for centrally managing all functional areas of City Title VI compliance and serves as a lead for ongoing, internal strategic actions to advance equity in our public policy, services, outcomes, and impacts.

Central administration, in partnership across the city, identifies and develops citywide policy, administrative rules, standards, procedures, data, resources, and tools; guide related citywide accountability and performance efforts; provides technical assistance and training across the city to guide the institutionalization of equity; provides analysis and advisement based on federal regulations, civil rights law, best practices, and community stakeholder engagement; support and help bureaus make progress on equity outcomes and compliance; and identifies strategies to assure truly equitably government for community. This centrally coordinated approach and framework works to provide,

- Strategies that enable the City to deliver on our goals of creating a just and equitable Portland,
- Strategies for the City to organize and align around, and
- Frameworks, tools, support, process and infrastructure.

All City offices, bureaus, and employees therein are responsible for complying with the provisions of and related to Civil Rights Title VI; ensuring rights are protected; for conduct, operations, and actions consistent with the

City's commitment. City Council directs city bureaus to implement the policy, standard operating procedures, tools, resources, and guidance set by the citywide administration. Equity and Title VI compliance requires a comprehensive approach – the bureaus are partners and leaders in this work. As the bureaus work to operationalize equity and Title VI into their programs, services, activities, planning, decision-making, resource allocation, and policy making, central administration works to support implementation, learn, and partner under their respective leadership.

The centrally coordinated approach and framework ensures we meet Title VI compliance requirements, that we have a centrally-coordinated management and performance system, that we are transparent and accountable to Portland communities, and that we are helping the Cities and bureaus make progress toward equity outcomes.

Language Access Administration

The City of Portland's language access responsibilities fall under its obligation to ensure nondiscrimination on the basis of national origin per Title VI of the Civil Rights Act of 1964 and Executive Order 13166, which further expands on those protections for limited English proficiency (LEP) individuals. The City of Portland's language access efforts are directed and developed by the Equity & Language Access Analyst from the Office of Equity and Human Rights. A subject matter expert, the Equity & Language Access Analyst creates standards, policy, procedures, resources, and tools; and provides language access analysis and advisement based on federal regulations, civil rights law, best practices, and community stakeholder engagement.

The City of Portland is responsible for taking reasonable steps to provide equitable and meaningful access to it programs, services, activities, and communications to members of the public who have limited English proficiency and experience institutional language barriers. City bureaus can be proactive in creating access to government for limited English proficiency (LEP) community members, and demonstrate compliance with Title VI, by implementing the citywide language access processes, guidance, tools, and resources, provided by the Office of Equity and Human Rights' Equity & Language Access Analyst.

The City of Portland's first language access policy and citywide language access program were established by City Council on November 2020 through Resolution no. 37516.

City Council directs city bureaus to implement the policy, standard operating procedures, tools, resources, and guidance set by the citywide Language Access Program directed by the Equity and Language Access Analyst of the Office of Equity and Human Rights.

As the bureaus work to operationalize language equity into their programs, services, activities, planning, decision-making, resource allocation, and policy making, the Equity and Language Access Analyst, who serves as the city's lead language access advisor, provides technical assistance and training across all levels of city government to guide the institutionalization of language equity citywide by providing a robust language equity analysis in order to assess institutional language barriers and provide strategies to increase equitable access for multilingual and multicultural communities who experience institutional language barriers and have the civil right to equitable access to government.

ADA Title II Administration

Disability Equity and ADA Title II administration, housed in the Office of Equity and Human Rights, leads the work, citywide, for institutional alignment with the goals, objectives, intent, provisions and regulations of ADA Title II in an integrated approach furthering Disability equity and justice. As Title II requires programs, services, and activities offered through local governments to be accessible and usable to people with disabilities, the City

works to achieve this broadly through non exclusion, effective communication, programmatic access, and architectural access; and ensure that every program, service, benefit, activity and facility operated or funded by the City of Portland is accessible to people with disabilities. Central administration identifies and develops citywide policy, administrative rules, best practices and procedures for ADA Title II compliance, provides technical assistance to bureaus and community, including questions, issues, policy, programming, planning efforts, best practices, institutional tools, and service delivery; identifies strategies to assure truly equitably government for people living with disabilities; and guides bureau leads on compliance documentation and data tracking.

Organization Staffing and Structure

In the reporting year, there were significant changes to the city's organization, structure and staffing, and Title VI administration. Below are the key leadership positions that currently play a significant role in Title VI and Title II administration at the citywide level.
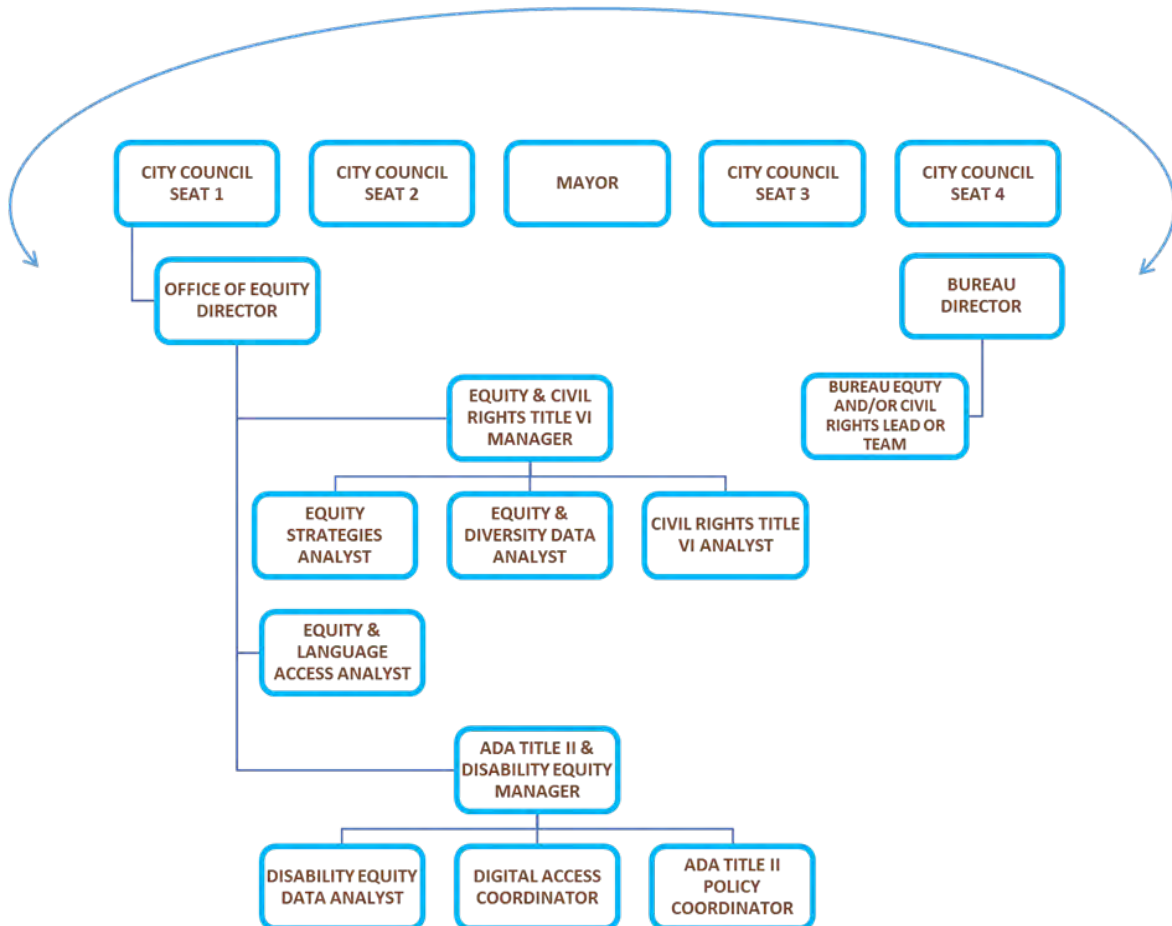
Image 2: graphic representation of citywide Civil Rights Title VI staff structure explained above.

Portland City Council

The City of Portland's Council and Mayor serve as the city's highest Civil Rights Title VI authority, including, as of this writing, Mayor Ted Wheeler, Commissioner Carmen Rubio, Commissioner Jo Ann Hardesty, Commissioner Dan Ryan, Commissioner Mingus Mapps, and City Auditor Mary Hull Caballero. As legislative and administrative decision-makers for the city, they are responsible for ensuring implementation of the City's Civil Rights Title VI policies, initiatives, and plans.

Commissioner-in-charge. Commissioner Carmen Rubio currently oversees the Office of Equity & Human Rights (OEHR) and is the administrative authority of Civil Rights Title VI regulations and obligations.

Office of Equity & Human Rights

The Office of Equity is the City office responsible for establishing overall city equity policies, plans, best practices, and strategies. The bureau is also responsible for developing, coordinating, monitoring, and tracking accountability strategies for Civil Rights Title VI; assisting with, facilitating, monitoring, and evaluating

implementation of Civil Rights Title VI compliance by city bureaus; and coordinating and providing citywide progress and compliance reports. The Office includes a variety of functions. The specific Civil Rights leads are identified above and partner across the Office and City for compliance.

Office of Equity & Human Rights Director. Lisa Watson (she/her) was appointed Director of the Office of Equity in June 2022. On behalf of the mayor and city council, she is responsible for the overall central management, leadership, direction, and administration of Equity, Civil Rights Title VI, Language Access, and ADA Title II.

Citywide Equity & Civil Rights Title VI Manager. Danielle Brooks (she/her) is the citywide Equity and Civil Rights Title VI Manager. She leads and directs citywide administration of Civil Rights Title VI and related Racial Equity efforts tied to equitable public decision-making, investments, services and outcomes. She directs the work of the division and manages and supervises staff. The Manager serves as an advisor and provides racial equity analysis across all levels of government. The Manager, in collaboration with the Title VI/Equity Strategies Team, creates standards, policies, administrative rules, plans, procedures, resources, data, and tools for use citywide utilizing the legal framework of Title VI; provides technical assistance and training across the city to guide the institutionalization of equity; serves as an advisor across all levels of government and provides racial equity analysis based on federal regulations, civil rights law, equity best practices, and community stakeholder engagement; guides bureau leads on accountability and performance systems; and identifies strategies to assure truly equitably government for community.

Civil Rights Title VI Analyst. The citywide Civil Rights Title VI Analyst supports the work of the program. The analyst supports the design and development of initiatives and serves as a lead for guiding implementation and evaluation of Title VI policies, plans, practices, or tools. They provide consultation and guidance, resources, SOPs, communications, technical assistance, and training and help develop organizational and people capacity. Serve as a point of contact for the public.

Equity and Diversity Data Analyst. The Data Analyst manages the growing body of data and data systems associated with Equity, Diversity and Civil Rights Title VI. The position works with the team, across the Office and across the city to support the work of the division and the office. The position works to support informed decision-making, data tools and systems, performance management, accountability systems, evaluation, reporting, coordination and capacity building across bureaus, and data collection and visualization associated with advancing Equity Goals, equitable service and public impacts, and Civil Rights Title VI compliance.

Equity Strategies Analyst. The Equity Strategies Analyst is responsible for guiding bureaus' development of the next Five-year Racial Equity Plans, coordinating with Title VI Plan development to develop a cohesive plan and reporting system, and working collaboratively citywide on the implementation and the improvement of the Equity Toolkits adopted by the City of Portland. They provide practical guidance on effective ways to achieve equitable results from the use of toolkits, and implementation and ongoing accountability of the Plans.

Equity and Language Access Analyst. Tatiana Elejalde (she/her) is the citywide Equity and Language Access Analyst and serves as subject matter expert and citywide language access advisor across all levels of city government. Tatiana is responsible for developing and establishing the city of Portland's first language access program and wrote the city's first language access policy. She directs the City's language access efforts and is responsible for creating standards, policies, procedures, resources and tools for use citywide utilizing the legal framework of Title VI and E.O. 13166. As the Citywide Equity and Language Access Analyst she provides an equity and language access analysis to assess institutional language barriers advising city bureaus on strategies and processes and providing guidance for the bureaus to track, monitor, assess, and evaluate city programs, services, activities, and communications to mitigate and remove institutional barriers and provide equitable and

meaningful access to multicultural and multilingual communities who experience institutional language barriers in accordance with city government's institutional responsibility under Title VI of the Civil Rights Act of 1964 and Executive Order 13166. Tatiana also leads the city's first language pay differential policy (a historic equity initiative for the city) and has done so from policy development to the creation of new citywide processes for the implementation of the policy.

ADA Title II and Disability Equity Manager. Nickole Cheron (she/her) is the citywide ADA Title II and Disability Equity Manager. She works with city offices and bureaus to ensure that every program, service, benefit, activity, and city-operated facility is accessible to people with disabilities. She serves as the cities ADA Title II compliance officer and central administrator to a host of ADA Coordinators in multiple bureaus. She directs the work of the Disability Division. She works closely with attorneys and city council offices on citywide projects that are externally facing.

ADA Title II Policy Coordinator. The ADA Title II Policy Coordinator provides consultation and technical support to City bureaus on achieving compliance ADA Title II internal policy and administrative rule. They provide training and serve as the effective communication lead.

Digital Access Coordinator. Joseph Sherman (he/him) is the cities subject matter expert on digital access. He provides effective communication training on making all digital content accessible. He takes the lead with the bureau of technology services to promote accessible web content and work toward a citywide digital access policy.

Disability Equity Data Analyst. Brie Scrivner (they/them) was recently hired as the disability equity data analyst. Brie's primary responsibility is to create data tools that demonstrate impacts for people living with disabilities in Portland. They also have a primary role in reporting back on Self-evaluation data.

City Bureaus and Offices

All Portland bureaus and offices are responsible for the implementation of Civil Rights Title VI plans, strategies, policies, procedures, practices, and activities. This may include developing, identifying, coordinating, and organizing plans, strategies, policies, practices, and efforts specific to the bureau to meet goals, intents, obligations, and provisions of Title VI.

Bureau Directors and Lead Staff. Directors are responsible for appointing a Title VI lead or liaison. Each Bureau Director, and their designee, in alignment with central administration, work to implement and administer Title VI at the bureau level. The Bureau Leads work collaboratively with the Title VI Manager, Bureau Leadership, and bureau divisions and function as liaisons between the Office of Equity and their bureau. As work is both upstream and downstream, Directors and Lead staff are responsible for implementing tools and strategies developed at a citywide level, developing, evaluating, or adapting policies and procedures specific to the bureau, collaborating across bureaus on strategies, and monitoring, evaluating, and reporting on bureau compliance activities in the bureau. Leads serve as a resource and understand the application of Title VI and equity to their respective bureau's scope, purpose, programming, and services.

Other Key City Bureaus and Roles

A few partner bureaus lead key regulatory areas or components related to Title VI compliance. Coordination and collaboration of Civil Rights compliance must occur at citywide levels and with the central program, within individual bureaus, and across bureaus to maximize effectiveness, efficiency, institutionalization, and accountability.

Office of the City Attorney. In addition to the Office of Equity, the Office of the City Attorney provides legal guidance in the administration and implementation of Title VI compliance.

Office of Community and Civic Life. Civic Life leads the City's public engagement policies and initiatives designed to increase meaningful participation, engagement, access, involvement, and further equity. These include the adopted Public Involvement Principles promulgated by the Public Involvement Advisory Committee (PIAC) and the establishment of the City of Portland Advisory Boards and Commissions policy (resolution 37328).

Bureau of Planning and Sustainability (BPS). BPS takes action to shape the future of Portland and advance climate protection for a more prosperous, healthy, equitable, and resilient city now and for future generations. They led Citywide Strategic Planning and Comprehensive Planning. BPS staff have published several reports and plans including a study on the history of racist planning in Portland, gentrification and displacement studies typology assessment, climate action plans, and the Anti-Displacement Foundation Report and Action Plan project. These resources have positively influenced and shaped PBOT's approach to public involvement, equity, and inclusion efforts including Title VI work.

Office of Management and Finance (OMF). OMF is responsible for internal and administrative services including Human Resources, Technology Services, and Financial and Revenue Services, which provides Citywide financial services, including accounting, financial reporting, treasury, debt management, grants management, risk management, and procurement administration.

City Budget Office (CBO). CBO provides information and analysis regarding budgeting, forecasting, and fiscal policy issues; develops the budget; and facilitates performance management.

Equity and Civil Rights Compliance Requirements and Internal Controls

The following actions, activities, and internal controls establish a foundation to comply and be accountable to the general requirements and objectives of Civil Rights Title VI, ADA Title II, EO 13166, EO 12898, EO 13985, and Equity. They are intended to operationalize and institutionalize compliance, advance equitable and nondiscriminatory impacts and services, and further benefits and interests of all communities in the City of Portland.

City Policies and Plans

Over the past years, there have been significant efforts across the city to center and integrate equity and Title VI into day-to-day operations. Title VI commitments, objectives, and provisions have been intentionally integrated and promulgated within numerous Citywide policies and plans, with due attention to key Citywide plans and the plans' purpose to establish Citywide population level-goals and strategic direction. Our policies, most of which have a binding effect, guide, or serve as mandatory approval criteria for decision making and operations, and far-reaching/long-term public impact. The most relevant and current plans and policies include:

- Administrative Rule 18.01 City of Portland Civil Rights Plan accepts the 2013 Civil Rights Title VI Plan to ensure nondiscrimination in programs, services, and activities, and work to achieve compliance with the provisions of Title VI. The plan details policy, administration, roles and responsibilities, major components, obligations, or implementing requirements of Title VI. This is binding City policy. The City will be working over the next few years to update the Title VI Plan (See Planned Goals and Activities section).
- Administrative Rule 18.32 Civil Rights Title VI and ADA Title II Compliance declares and reaffirms support for robust standards of Civil Rights Title VI and ADA Title II Compliance throughout City Bureaus and Offices, and directs the Office of Equity and Human Rights to continue to lead efforts by establishing Citywide policies, practices, accountability measures and supporting the work of the bureaus. City Bureaus are directed to implement policies, plans and procedures and take other actions to achieve compliance. This is binding City policy.
- City Code Chapter 3.128 Office of Equity and Human Rights establishes the Office of Equity and Human Rights, its purpose, and delegates rulemaking authority to the Director of the Office of Equity and Human Rights. This endows the Director the ability and authority to develop, manage and maintain central administration of Civil Rights compliance especially through administrative rule making.
- Administrative Rule 18.21 City of Portland Americans with Disabilities Act Title II Non-discrimination Policy reaffirms the City's previous policies to comply with Title II of the ADA and not discriminate against qualified individuals with disabilities in its services, programs, and activities.
- Resolution No. 37516 Establish the City's Language Access Policy and Program and direct city bureaus to implement the policy, standard operating procedures, tools, resources, and guidance adopted by the Office of Equity and Human Rights. It is the policy of the City of Portland to ensure meaningful access to the City's programs, services, activities, information, and communications to all community members including individuals who are limited English proficient (LEP). The City of Portland is responsible for taking reasonable steps to provide equitable and meaningful access to its programs, services, activities, and communications.
- Resolution No. 37525 Establish a language pay differential for multilingual City employees and authorize the Bureau of Human Resources and the Office of Equity and Human Rights to establish processes and procedures necessary for implementation. Institutionalizing the language pay differential policy increases equitable access to government for linguistically and culturally diverse community members served by the City of Portland. Increasing the number of different languages spoken by City staff to serve the public,

demonstrates a proactive effort to comply with institutional civil rights obligations to reduce institutional language barriers, increase meaningful access to government, and increase national origin non-discrimination protections.

- ADM 18.30 Citywide Racial Equity Goals and Strategies establishes Citywide Racial Equity Goals and Strategies as binding City policy and provides a guidepost for City employees and leadership to follow, to achieve the racial equity goals. Goals 2 and 3 further promulgate and codify goals and objectives aligned with Civil Rights Title VI and Title VI administration.

- ADM 18.33 Citywide Disability Equity Goals establishes Citywide Disability Equity Goals as binding city policy, that all the city does with provide for equitable outcomes and opportunities in accordance with the ADA and directs the Office of Equity to develop and implement policies promoting the Citywide Disability Equity Goals created by this Resolution, including policies to provide effective communication as defined under Title II of the ADA.

- Resolution No. 37492 Adopt Anti-Racism, Equity, Transparency, Communication, Collaboration, and Fiscal Responsibility as the Core Values of the City of Portland to inform a unified workplace and city culture, systems, policies, practices, and procedures.

- Administrative Rules 18.02 Title VI Civil Rights Complaint Procedure outlines all the requirements of the City and its bureaus for Civil Rights Title VI complaint compliance, established complaint procedure, and clearly defines the roles and expectations of the bureaus and of Office of Equity as the Civil Rights Title VI coordination authority.

- Administrative Rule 18.20 ADA Title II Complaint Procedures outlines requirements of the City and its bureaus for ADA Title II complaint compliance, established complaint procedure, and clearly defines the roles and expectations of the bureaus and of Office of Equity as the ADA Title II coordination authority.

- In an effort to make all City of Portland facilities and programs accessible to all the City developed a comprehensive ADA Title II Transition Plan identifies barriers which impede access to City facilities that are open to the public and fulfills requirements set forth in Title II of the ADA. The City's ADA Title II Transition Plan team surveyed 342 unique facilities, identified roughly 25,000 individual barriers, and has scheduled their removal over time. Transition Plan supplements for Portland Parks and Recreation, the Performing Arts Centers, and Right-of-Way, including a Right-of-Way Self Evaluation, were developed in the years following the initial report. This is a living document, regularly updated as barriers are removed, and new facilities come under ownership or control of the City.

- Administrate Rule 18.31 City's Budget Equity Tool and Racial Equity Plans Directs City bureaus to adopt and use the Equity Budget tool on all budget proposals and base budgets, complete and update Racial Equity Plans, and measure collective actions from plans and submit reports to the Office of Equity.

- In May 2020, City Council passed Resolution 381-2020 (Declare intent to centralize, guide and coordinate COVID-19 efforts that bolster progress towards the City's COVID-19 long-term recovery goals) which included a directive from City Council giving the Office of Equity authority to hold bureaus accountable to components of the COVID-19 Response Equity Toolkit and subsequent resources that prioritize Black, Indigenous, people of color, people with disabilities and other historically and presently oppressed communities. In addition to this direction, the Resolution encouraged City Bureaus to collaborate and use a Results-Based Accountability Approach as they develop strategies, actions, and budget guidance to address the COVID-19 crisis and long-term priorities and goals.

- The City's 25-year Strategic Plan, the Portland Plan, establishes a core set of City priorities including prosperity, education, health and equity. With an eye towards 2035, short- and long-term goals are set for the entire city, as well as geographically specific recommendations. It is worth noting that the plan is based on extensive analysis of quantitative data, information about conditions in Portland's diverse

neighborhoods, and culminated in a collaborative design with partners across more than 20 municipal, regional, and community agencies and organizations.   The Framework for Equity within the Portland Plan set forth a new approach to Equity and Justice. Many Plan elements and actions are specific to Title VI compliance and compliance activities. For more information visit the website.

- The 2035 Comprehensive Plan is a long-range plan that helps the City prepare for and manage expected population and employment growth, as well as plan for and coordinate major public investments decision and land use between now and 2035. The Plan addresses future development, and it includes expectations for how and when community members will be involved in land use decisions. As Portland's primary tool to implement the Portland Plan, the Comprehensive Plan vision is guided by five principles (Economic Prosperity; Human Health; Environmental Health; Equity; Resilience), statewide planning goals, Metro 2040 growth concept, and urban design direction. Sections of the Plan, including Chapters 1, 2, and the narrative on Equitable Development polices align with and strengthen work related to Title VI compliance.

Public Policy Statement and Notification

The Office of Equity developed and posts the City's Equity, Civil Rights, and Nondiscrimination Notice, ADA Title II Notice, and Meaningful Access Statements used by City bureaus and offices to post electronically, at central locations, on appropriate signage, and communications/materials. The Notices and Access Statements, guidance for use and dissemination, and translations are available on the Office's website. Depending on the communication and medium, notice or statements are featured sitewide on Portland.gov pages, in substantive materials including but not limited to brochures, written correspondence, letters, project documents, guides, informational signs, forms, newsletters, overview sheets or surveys, program or service information, maps, reports, plans, outreach and engagement materials, and mailings.

Citywide Equity, Civil Rights, and Nondiscrimination Notice

The Equity, Civil Rights, and Nondiscrimination Notice is broader and covers, or refers to, nondiscrimination in other fields and City policies, including the city's Civil Rights policy outlined in Title 23 of Civil Rights Code, Human Resources Administrative Rules 2.01 and 2.02, ADA Title II, Language Access and Meaningful Access in addition to Civil Rights Title VI. Current version:

> The City of Portland ("the City") is committed to advancing equity, civil rights, racial justice, environmental justice, equal opportunity, and nondiscrimination in accordance with all applicable federal, state, and local laws and statutes including the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, Executive Order 13166 on Language Access, EO 13985 on Advancing Racial Equity, the Americans with Disabilities Act of 1990, ORS chapter 659A, and Portland City Code Chapter 23. It is the policy of the City to eliminate discrimination based on protected classes of race, religion, color, sex, marital status, familial status, national origin, age, mental or physical disability, sexual orientation, gender identity, or source of income. Such discrimination poses a threat to the health, safety, and general welfare of Portland community members and menaces the institutions and foundation of our community.

> It is unlawful to discriminate on the basis of the above listed protected classes in programs, activities, services, benefits, and employment, whether carried out by the City directly or through a contractor or any other entity with whom the City of Portland arranges to carry out its programs and activities except as allowed by federal law, rules and regulations.

Civil Rights Title VI and ADA Title II

The City ensures that no person, on the basis of race, color, national origin or disability, be excluded from participation in, denied benefits of, or be otherwise subjected to discrimination in any City program, service, administrative act, or activity as provided by Title VI of the Civil Rights Act of 1964 ("Title VI"), Title II of the Americans with Disabilities Act of 1990 ("Title II"), and all other related statutes and regulations. The City is committed to complying with all the requirements, regulations, and intent of Title VI and Title II. The City will make every effort to ensure nondiscrimination, access, equity, and justice in our public plans, policies, administrative acts, benefits, impacts, programs, services, and activities.

For additional information on the City's Title VI or Title II nondiscrimination requirements and contact information for the ADA Title II Manager or Civil Rights Title VI Manager, please visit the City's Civil Rights Title VI and ADA Title II website or call 503-823-4433 or 311, Relay: 711.

Making a City Civil Rights Title VI or ADA Title II Complaint:

Any person or class of persons who believes they have experienced unlawful discrimination - practice, treatment, impact - under Title VI or Title II, in the receipt of City benefits, services, or actions may file a complaint with the City of Portland. Any complaint must be filed within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint and for contact information visit our Complaints webpage or call 311.

Equal Employment Opportunity and Workplace Nondiscrimination

The City is an equal employment opportunity employer and is committed to an active affirmative action and diversity program. It is the City's policy to prohibit workplace harassment, discrimination, and retaliation on the basis of a protected status. Protected status includes race, religion, gender, marital status, familial status, national origin, age, mental or physical disability (as defined by the Americans with Disabilities Act and state law), sexual orientation, gender identity, source of income, protected veterans' status, and other protected status under applicable law. The City is committed to creating a respectful and professional work environment that is free of harassment, discrimination, and retaliation and that promotes employment opportunities.

For more information, including how to file a complaint, or contact information visit the City of Portland Bureau of Human Resources.

Meaningful Access

The City is committed to providing meaningful access and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids, and services. To request these services, contact the responsible bureau or office. To request these services from the Office of Equity, contact 503-823-4433, City TTY 503-823-6868, Relay Service: 711 or email oehr@portlandoregon.gov.

You may file a complaint directly with the U.S. Department of Justice, Federal Coordination and Compliance Section of the Civil Rights Division. Visit Filing a Complaint, call (888) 848-5306 or mail your

complaint directly to Federal Coordination and Compliance Section - 4CON, Civil Rights Division, U.S. Department of Justice, 950 Pennsylvania Avenue, N.W., Washington, D.C. 20530.

Shortened Version for Limited Space

The City of Portland is committed to equity and meaningful access, and prohibits discrimination based on race, color, national origin (including limited English proficiency), disability, age, sex, sexual orientation, gender identity, religion, source of income, or familial status in accordance with local, state, and federal laws. To request translation, interpretation, accommodations, modifications, or other auxiliary aids or services, or to file a complaint of discrimination, contact XXX-XXX-XXXX [add program contact information] or 311 (503-823-4000), for Relay Service & TTY: 711.

503-823-4000: Traducción e Interpretación | Biên Dịch và Thông Dịch | 口笔译服务 | Устный и письменный перевод | Turjumaad iyo Fasiraad | Письмовий і усний переклад | Traducere și interpretariat | Chiaku me Awewen Kapas | अनुवादन तथा व्याख्या | Translation and Interpretation

Meaningful Access Statements

Meaningful Access Statements ensure the public is notified of their civil right to request access to city government programs, services, activities, and communications. It informs the public on how to make requests for access and lists appropriate and direct contact information for the public to use for placing the requests. The statement should be included in (but not limited to): most points of written public contact, interface, communications, websites, brochures, informational material, flyers, posters, signage, email signature lines, press releases, guides, plans, policy, forms, bills, tickets, surveys, etc. The meaningful access statement provides City of Portland staff with minimum guidelines for providing inclusive and equitable engagement and removing barriers to access. Statement versions, along with purpose, guidance for staff, and translations are available on the City's website. Current templates:

Long Version

It is the policy of the City of Portland that no person shall be excluded from participation in, denied the benefits of, or be subjected to discrimination in any city program, service, or activity on the grounds of race, color, national origin, disability, or other protected class status. Adhering to Civil Rights Title VI and ADA Title II civil rights laws, the City of Portland ensures meaningful access to City programs, services, and activities by reasonably providing: translation and interpretation, modifications, accommodations, alternative formats, and auxiliary aids and services. To request these services, contact XXX-XXX-XXXX [insert appropriate bureau/staff contact information] or 311 (503-823-4000), for Relay Service & TTY: 711.

Short Version

The City of Portland ensures meaningful access to City programs, services, and activities to comply with Civil Rights Title VI and ADA Title II laws and reasonably provides: translation, interpretation, modifications, accommodations, alternative formats, auxiliary aids and services. To request these services, contact XXX-XXX-XXXX [insert appropriate bureau/staff contact information] or 311 (503-823-4000), for Relay Service & TTY: 711.

Limited Space

The City of Portland is committed to providing meaningful access. To request translation, interpretation, modifications, accommodations, or other auxiliary aids or services, contact XXX-XXX-XXXX [insert appropriate bureau/staff contact information] or 311 (503-823-4000), for Relay Service & TTY: 711.

"Translation and Interpretation" line to add to statements

503-xxx-xxxx Traducción e Interpretación | Biên Dịch và Thông Dịch | 口笔译服务 | Устный и письменный перевод | Turjumaad iyo Fasiraad | Письмовий і усний переклад | Traducere și interpretariat | Chiaku me Awewen Kapas | अनुवादन तथा व्याख्या | Translation and Interpretation

ADA Title II Notice

Current version of the Notice Under the Americans with Disabilities Act:

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), Portland will not discriminate against qualified individuals with disabilities on the basis of disability in its activities, programs, and services.

Effective Communication

The Americans with Disabilities Act requires that people with disabilities are able to receive and communicate information as effectively as people without disabilities. One of the ways Portland ensures it is effectively communicating with people with disabilities is by providing at no charge appropriate communication aids and services. Examples of appropriate aids and services Portland could provide include: accessible electronic documents; assistive listening devices; braille documents; captions; a reader/transcriber; sign language; and other ways of making communications and information accessible to people who have cognitive, speech, hearing, and/or visual disabilities.

Modifications to Policies and Procedures

Introduction of Reasonable Modification

Portland will reasonably modify its policies, practices, and procedures so people with disabilities can access City activities, facilities, and services; furthermore, Portland will provide reasonable modifications quickly, easily, and without requiring proof of disability.

Defining Reasonable Modification

A reasonable modification is a change or exception to policy, practice, or procedure that allows people with disabilities to have equal access to the activities, programs, and services offered by Portland. Reasonable modifications must always be related to an existing disability; for example, a modification to allow electric wheelchairs in an area where electric vehicles are not normally allowed will not be granted unless someone using an electric wheelchair plans to access the area in question.

When requesting a reasonable modification to a policy, practice, or procedure, an individual with a disability is not required to provide medical documentation or information about a diagnosis, but they must be able to explain how their disability relates to the requested modification.

Examples of Reasonable Modifications
- City Hall modifies its "no pets" policy to allow service animals to enter
- Allowing the user of an electric wheelchair to use their chair in locations where electric vehicles are banned

- Allowing an exception to the City's setback rule so an individual with a disability can install a wheelchair ramp in front of their home
- Assisting someone with a cognitive disability in understanding and completing a City form

Denying Requests

Although circumstances where Portland would deny a requested aid or service or a modification are rare, two possibilities could lead to a denial:

- Granting the request would fundamentally alter the essential nature of the activity, program, or service
- Granting the request would result in undue administrative and financial burdens

If Portland must deny a requested aid or service or a requested modification, every effort will be made to ensure accessibility and inclusivity.

Requesting an Appropriate Aid or Service or a Modification

There are four places you can go if you want to request an aid to make communication more effective, or if you want to request a policy, practice, or procedure be modified:

- If you know the person directly running the activity, program, or service in question, it's best to start there.
- If you do not know who is running the activity, program, or service in question, call 311 and you will be directed to the right person.
- Complete the online [Request an ADA Accommodation](#) form.
- If you have questions about requesting an appropriate aid or service, or about a possible modification, contact Nickole Cheron, ADA Title II and Disability Equity Manager at Nickole.Cheron@portlandoregon.gov.

Complaints

There are three ways you can file a complaint about the accessibility of an activity, program, or service offered by Portland:

- Online: [File an ADA Complaint | Portland.gov](#)
- Contact the ADA Coordinator for the bureau running the activity, program, or service in question.
- If you do not know who to contact, call 311 and you will be directed to the right person.

If you have questions about Portland's complaint process, contact Portland's ADA Title II and disability equity manager Nickole Cheron at Nickole.Cheron@PortlandOregon.gov.

Demographic Data, Research, and Analytic Tools

The City of Portland uses demographic data, analytic tools, and other practices to inform and guide decision making to ensure nondiscrimination and advance equity. We use demographic data to assess equity in the distribution of services and benefits, to inform purpose and goal setting, to identify and address impacts, and take appropriate measures to avoid or mitigate potential disparities. The Office of Equity and City bureaus develop and implement these resources for use at an enterprise level. While not comprehensive, some key data resources, sources of demographic data, and analytic tools are described below.

- Portland Census profile data by neighborhood was created in collaboration with Portland State University's Population Research Center. These [Neighborhood Profile Data](#) and Maps provide demographic data profiles, mapping tools, and additional information by neighborhood. These profiles are based on 2020 Census data, the American Community Survey, Feeding America food insecurity data, CDC Social Vulnerability Index, Portlandness: A Cultural Atlas, and National Center for Health Statistics Life Expectancy Estimates.

- The [Portland Housing Bureau Opportunity Map](#) identifies levels of opportunity in Portland neighborhoods. Using a 5-point scale, the map is based on variables that include childhood education, employment, transportation, access to family wage jobs, and access to community amenities that promote heathy, active living.

- The Anti-Displacement Action Plan Map Tool or Vulnerability Analysis and Mapping (under development), [Gentrification and Displacement Neighborhood Typology Assessment - Supporting Maps](#) and additional [Anti-displacement Documents](#) are provided by the Bureau of Planning and Sustainability.

- The Portland Bureau of Transportation (PBOT) uses a simple equity ranking index called an [Equity Matrix](#) to help make decisions on projects and programs. This map uses data on race and income to score Portland census tracts. It also uses data on limited English proficiency for additional context.

- [City of Portland Open Data site](#) provides Portland GIS Data available for download. Formats include API (GeoJSON and GeoService), Shapefile, Spreadsheet and KML formats.

- All information is stored in a central database and shared publicly through the City's [Rescue Plan Open Data Portal website](#). Its structure and content were shaped by the Community Leads Cohort, community leaders partnering with the City to improve data and technology use. They told us what information frontline communities would like to see in the portal and helped us create context to improve accountability and reduce the risk of harm. Together, we are co-creating engagement events for Summer 2022 – to share the portal with community, gather feedback, and support community data literacy.

- The Equity Data Atlas is an internal inventory and guide of existing equity-related administrative data, infrastructure, data portals, matrices, reports, maps, surveys, directories, assistance programs, etc. The purpose is to help support and coordinate equity data work across the City.

- The City's [Racial Equity Toolkit](#) was designed to help staff achieve this mission by applying an equity lens to our work. Racial equity tools are designed to integrate explicit consideration of racial equity, civil rights compliance, and nondiscrimination in decisions, including policies, practices, programs, and budgets. Use of racial equity tools incorporates new processes of decision-making and participation that build community capacity, foster meaningful engagement and genuine participation in the decision-making process, and delivery of service that better represents communities' needs and priorities.

- The [COVID-19 Response Equity Toolkit](#), developed by the Office of Equity in partnership with City Bureaus and Equity Practitioners, provided guidance for centering pandemic relief on populations with urgent needs. The Equity Toolkit also included access to tools and technical assistance to help inform priorities, strategies, and decision-making. The Equity Toolkit, shaped by input from more than 80 community-based partner organizations, is a guide and resource for City staff. It includes equity expectations and guiding principles; information about how to use a Results-Based Accountability approach in the design and implementation of response programs and actions; local disparities data and trends on high-risk populations; themes from community engagement; and information about our legal obligations and practices under various local and federal regulations including Civil Rights Title VI, Language Access, and ADA Title II. As directed by Resolution 381-2020, the Equity Toolkit questions for programmatic or policy decisions and for determining the impact of the proposed relief on vulnerable populations in Portland, were provided to all project teams receiving American Rescue Plan LFRF (Local Fiscal Recovery Funds).

- The Factor 1 analysis is a federally mandated analysis that involves assessing the number or proportion of LEP (Limited English Proficiency) persons by language group eligible to be served by a program, activity, or service. It covers the entire city of Portland service area. The analysis uses demographic data from the five-year American Community Survey and the Oregon Department of Education school enrollment data for school districts in Portland. Further, the analysis helps develop the safe harbor language list. The non-English language groups qualify for the safe harbor provision by having an LEP population of 1,000 people or more within the Portland service area. The analysis also helps generate spatial distribution of LEP population in the City which in turn will serve as citywide equity tools. The accompanying guidance to the demographic analysis is developed by the Office of Equity's Equity and Language Access Analyst and directs the bureaus on the utilization of the language equity tool and resource and includes standards and best practices for city bureaus to follow regarding community engagement, cultural considerations, and usage of the tool and the languages list generated from the analysis.
- [Community research and reports](#) like the People's Plan or 2017 IRCO needs assessment
- The City of Portland has integrated the Budget Equity Assessment Tool into the budget proposal requirements. This [Budget Equity Assessment Tool](#) is a set of questions to guide City bureaus and their Budget Advisory Committees in providing a holistic assessment of how budget allocations benefit and/or burden communities, especially Indigenous people, Black people, immigrants and refugees, people of color, and people with disabilities. This analysis is required and critical to implement changes, both in the short- and long-term, to help meet bureau and City equity goals. More information is available in the [Budget Development Materials](#) provided by the City Budget Office.
- The [State of Housing in Portland](#) report is published annually by Portland Housing Bureau to provide stakeholders and policy makers with a comprehensive look at Portland's housing market by neighborhood, housing type, and affordability using the latest available data.
- The City uses other regional and national external demographic data sources for informed equitable decision-making and engagement including, for example, the [Metro Regional Barometer](#), [National Equity Atlas](#), [Census Bureau](#), and the [EJ Screening and Mapping Tool](#) (EJScreen) in addition to other more specific sources.
- All these resources and more are available on the [Equity and Title VI Best Practices and Resource](#) page including [Anti-racist RBA resources](#), [Equitable Decision-making/Analytic Tools](#), [Demographic Data Sources](#), [Key City and Regional Plans](#), [Community Research and Publications](#), and [Equitable Engagement and Involvement Resources and Practices](#). See ADA Title II Section for links to resources on Demographics and Data Collection related to People with Disabilities communities.

Community Engagement & Public Involvement

The City of Portland has a comprehensive community engagement and public involvement process to ensure Black, Indigenous, People of Color, Immigrant and Refugee, multilingual populations, low income, and people with disabilities communities are engaged through throughout planning, decision-making, service delivery, public outreach and involvement activities. With consideration to the form of government, the City has institutionalized and is actively implementing legislative and operational touchpoints that provide visions, goals, objectives, actions, and proactive strategies to both drive and shape public participation and community involvement and hold our institution accountable to such a core element of Civil Rights compliance.

Equitable engagement is institutionalized at a citywide and bureau-level. The citywide Community Engagement framework directs, outlines, and guides community engagement at the City and holds the bureaus accountable. Additionally, each bureau, with respect to their work, takes steps and efforts to implement and adhere to citywide policies and procedures and develop practices, procedures, guidance, and policies that bring principles

in to practice and build on citywide efforts in accordance with their functions, needs, operations, and administrative structure.

Citywide engagement is led by the Office of Community & Civic Life (Civic Life). Civic Life connects Portlanders with city government to build inclusive, safe, and livable communities. Civic Life's programs invest in building strong civic engagement, community leadership, and support relationships between businesses and their neighbors including the Advisory Bodies Program, Disability Program, Neighborhood Program, Diversity in Civic Leadership Program, and the Immigrant and Refugee Program. Furthermore, Engagement is woven throughout the framing policies described above. In addition to those policies, the City's engagement framework is informed and guided by laws, best practices, and guidance from a variety of sources, including:

- Portland's Public Involvement Principles guide City officials and staff in establishing consistent, effective, and high-quality community involvement. The principles represent a road map to guide government officials and staff in establishing consistent, effective, and high-quality public involvement across Portland's City government. The principles are intended to set out what the public can expect from City government while retaining flexibility in the way individual City bureaus carry out their work. This document continues to serve as a resource for City staff as well as a tool for community members seeking to leverage better public processes.
- Additional Public Involvement and Notification Policies, including
    - ADM-4.01 - Web-Based Inventory of Significant Policies, Programs & Projects
    - ADM-4.03 - Standards for Neighborhood Associations, District Coalitions, Business District Associations and the Office of Neighborhood Involvement
    - ADM-4.05 - Guidelines for Public Involvement in Bureaus' Budget Advisory Committee Process
    - ADM-4.06 - Public Involvement Advisory Council (PIAC) 2013 Annual Report, Appointment of PIAC Members, and Direction to Carry Out Specific Activities
- Chapter 2 of the 2035 Comprehensive Plan lays out the goals and policies for community engagement in long-term planning activities.

Engagement Practices and Resources for Staff

Bureaus have developed specific procedures, methods, plans, and resources for guiding equitable community engagement. The Office of Equity provides resources for staff to support meaningful and equitable community engagement in compliance with civil rights requirements in the Equitable Engagement and Involvement section on the Equity-Title VI Best Practices and Resources page. These include additional resources for accessibility, including Language Access Resources, engagement with Immigrant and Refugee Communities, ADA Title II Accessibility Resources, and engagement with People with Disabilities are described in sections above and below. The Office of Community and Civic Life provides many internal resources and the Bureau of Planning and Sustainability has developed a Community Engagement Manual to support their Long-Range Planning Community Engagement Committee and the policies outlined in Chapter 2 of the Comprehensive Plan.

Language Access

The Citywide Language Access Program, directed by the Equity and Language Access Analyst of the Office of Equity, develops and provides city staff with the citywide language access policy, standard operating procedures, tools, resources, and guidance for implementation at the city bureau level.

As the bureaus work to operationalize language equity into bureau programs, services, activities, planning, decision-making, resource allocation, and policy making, the city's Equity and Language Access Analyst, who serves as the city's lead language access advisor, provides technical assistance in the form of guidance and

recommendations and training to support the institutionalization of language equity citywide. Technical assistance is provided at the leadership level including to city attorneys, Council offices, bureau leadership, to program managers, and communications directors and leads. The Language Access program uses an approach which works through the legal framework of Civil Rights Title VI and E.O. 13166 and uses a language equity analysis in order to provide targeted strategies in policy development, planning, program and process design and evaluation, and culturally and linguistically specific community engagement to assess, mitigate and remove institutional language barriers.

For FY 21-22 the Equity and Language Access Analyst also served the remainder of her term as the city's COVID-19 Equity Officer and Language Access lead (March 2020-September 2021). Serving as Equity Officer within the Emergency Coordinator Center's (ECC) command and leadership level, an equity framework was employed and civil rights obligations and compliance was enforced and integrated into the Emergency Coordination Center's operations including the Joint Information Center (centralized emergency response communications). With the additional role of language access lead when the ECC mobilized to provide community-based vaccination clinics, June – September 2021, the Equity and Language Access Analyst in her role as Equity Officer and Language Access lead, developed processes and provided guidance to ensure there were onsite interpreters, access to remote interpreting including ASL, and provided training (including creating condensed RBA training module for crisis work) to vaccine clinic leadership including leadership from Portland Fire and Rescue and Portland Bureau of Emergency Management. Some vital resources were developed by the Equity and Language Access Analyst in this role including:

- COVID-19 Language Access Guidance, and
- Language Access tracking tool and guidance

The important 2 language access guidance documents outline civil rights responsibilities and were authored by the Equity and Language Access Analyst. These resources were operationalized throughout the emergency response period and were used during co-occurring emergencies including for emergency communications. Some emergency communications projects were created in over 35+ languages in order to reach linguistically isolated immigrant and refugee communities and worked to proactively remove barriers to accessing lifesaving information with health and safety impacts.

During the course of regular city operations numerous City staff across all levels of city government contact the Equity and Language Access Analyst to seek advisement on performing their duties in order to ensure compliance with civil rights laws and to learn best practices, federal thresholds, targeted strategies, receive training and recommendations on culturally and linguistically specific community engagement strategies, and to seek advisement on implementing standard operating procedures that institutionalize language equity citywide. The Equity and Language Access Analyst works with the Bureau of Human Resources leadership to design new citywide processes that support the institutionalization of the Language Pay Differential which is a historic equity initiative for the city of Portland that seeks to rectify workplace equity issues, proactively remove institutional language barriers, and seeks to increase the diversity of the workforce so it more accurately reflects the demographics of the city which includes upwards of 50K limited English individuals who have the civil right to equitable and meaningful access to the benefits of the City of Portland government.

ADA Title II and Accessibility

Title II of the ADA prohibits all state and local governments from discriminating on the basis of disability, but moreover, its goal is to promote equal access and full participation. The City of Portland works to ensure that every program, service, benefit, activity and facility operated or funded by the City of Portland is accessible to

people with disabilities. The City strives to eliminate barriers that may prevent persons with disabilities from accessing our facilities or participating in City programs, services and activities.

The City's ADA Title II Program is responsible for supporting Portland's efforts to comply with Title II of the ADA. Bureau ADA Title II liaisons meet quarterly for training and coordination.

Intake and referral of ADA Title II complaints and requests is centralized through the City's 311 program, Request and Complaints are routed to bureau representatives through an enterprise system that allows The ADA Title II Manager to communicate with bureau staff through the entire process.

ADA Title II Liaisons also have access to a library of resources located on both the intra and internet. These resources include:
- Effective Communication Resources
- Complaints
- Events and Meetings
- City of Portland Trainings
- Data Collection and Demographics
- Disability Equity and Disability Justice
- External Trainings
- Other Important Resources

The ADA Title II program coordinates and maintains The Transition Plan and The Self-Evaluation. Updates to both plans are in the works. The ADA Title II program recently built a sequel database to make updating scheduled barrier removals easier to track. The Self-evaluation Plan had not been updated since 1993 and the program recently received funds to launch a two-year process to update the plan.

Civil Rights Title VI and ADA Title II Complaints

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI or Title II may file a complaint with the City of Portland. The City of Portland's Administrative Rules 18.02 Title VI Civil Rights Complaint Procedure and 18.20 Title II ADA Complaint Procedure defines standard practices for Civil Rights complaint management across the city. The administrative rules specifically identify tracking protocols and accountability practices. Information about submitting a complaint is included in the Notice and Community members can access information on the How to File a Civil Rights Title VI Complaint webpage or How to File an ADA Title II Compliant webpage.

Complaint Submission/Central Intake Form

Any persons who believe they have been the subject of unequal treatment, discriminated against, or denied benefits of any program or activity provided by the City of Portland on the grounds of disability, race, color, or national origin may file a complaint with the City of Portland. Complaints must be in writing and may be written in the complainant's preferred language. If the complainant needs assistance in reducing the complaint to writing, they may request assistance from a PDX311 representative or they may have another person write and acknowledge the complaint on their behalf. A person can file a complaint on behalf of another person if they have a legal relationship that allows them to do so.

Community can report complaints against the City by using the **report discrimination form** or over the **phone** by calling 311, (503) 823-4000, or 711 for TTY via Oregon Relay Service. Staff are available Monday through Friday from 8:00 a.m. to 5:00 p.m., excluding Federal Holidays. *Allegations received by phone or TDD will be*

transcribed by city staff on a complaint form and provided to complainant for confirmation or revision before processing.

Community may submit a written complaint to the City, by **email, mail, or fax**.

Mail to:
PDX311
1120 SW Fifth Avenue
Suite 114
Portland, OR 97204
Attn: Discrimination Report

Email to: cityinfo@portlandoregon.gov with the subject "Discrimination Report"

Fax to: 503-865-3300

Written complaints must include the following **required details**:
- The name, address and phone number of the person who experienced the discriminatory action;
- The date of the alleged act of discrimination or the date when the complainant(s) became aware of the alleged discrimination;
- A brief but specific description of the discriminatory practice or action and any relevant facts, including as appropriate:
    - When
    - Where
    - City bureau, office, contractor or sub recipient involved
    - What happened; who was involved; policy program or activity that was discriminatory; how you were discriminated against, treated or impacted; etc.
- The names and contact information of any witnesses, including city employees or contractors.

Investigation process
What happens once a complaint is submitted?

Upon receipt of the complaint, a trained staff person will conduct an evaluation to determine:
1. If the complaint is complete;
2. If additional information is needed;
3. If the City has jurisdiction;
4. If the complaint is timely; and
5. Which Bureau is responsible for resolution

An appropriate Bureau coordinator will notify the complainant in writing within 15 working days whether the complaint has been accepted or not. If the complaint is not accepted, the Bureau will state why. If the complaint is not accepted because additional information is needed, the complainant will be notified what information is needed.

If the Complaint is accepted, the City will investigate the merits of the complaint and will attempt to resolve it.

In cases where the complaint is against one of the City of Portland's sub-recipients, the City will assume jurisdiction and will investigate the complaint.

In some instances the City will have a legal obligation to notify a state or federal agency of a Title VI complaint, and in such instances that agency may investigate the complaint.

How are Title VI complaints investigated?

In cases in which the complaint is against the City, the responsible Bureau will work with the complainant to investigate and attempt to resolve the complaint. The option of informal mediation meetings may be used at any stage.

The responsible Bureau will complete discrimination complaint investigations within sixty (60) business days after written notice of acceptance of the complaint. If the investigation is expected to exceed 60 business days, the responsible Bureau will notify the complainant of a revised timeline and the reason for the delay.

Once the investigation is complete, the responsible Bureau must provide a written response to the complainant with the findings and actions by the responsible Bureau. The Title VI complaint process is an administrative process and does not provide for compensatory or punitive damages.

Can the City dismiss a complaint?

The City of Portland may dismiss a complaint for any of the following reasons:
- The complainant withdraws the complaint.
- The complainant fails to respond to repeated requests for additional information needed to process the complaint.
- The complaint is untimely.
- The complainant cannot be located.
- The complaint is determined to be legally insufficient.

Complaint Resources for Staff

The Office of Equity provides resources for staff to support managing and resolving complaints available in the Title VI Complaints section on the Equity-Title VI Best Practices and Resources page and on the Complaints section on the ADA Title II Resources page. These include a Complaint Guidance Manual with supporting checklists, decision trees of the process, table and description of roles, a guidance manual with supporting checklists and templates, and referral information. Further Intake and referral of ADA Title II and Civil Rights Title VI complaints is centralized through the Cities 311 program. Complaints are routed to bureau representatives through an enterprise system that allows The ADA Title II/Civil Rights Title VI Manager to communicate with bureau staff through the entire process.

Equity - Civil Rights Education and Training

The City provides and sustains a variety of diversity, equity, inclusion, and nondiscrimination professional development, training, education, and technical assistance to bureaus and staff to build capacity in achieving equitable outcomes and service.

Racial Equity 101

In these ongoing and mandatory training sessions, between 2-4 hours, City staff learn fundamentals and background of racism, bias, discrimination, and equity; skills and tools necessary to implement a racial equity analysis on policies, practices, programs, and services to provide inclusive, accessible, meaningful participation and engagement, and non-discriminatory services and impacts. Training sessions help participants to recognize

institutional and systemic barriers to just access to services and opportunities for people of color and people with disabilities. Visit here for more information.

Anti-racist (or Racial Equity Centered) Results-Based Accountability

The Office of Equity offers several different professional development opportunities for Racial Equity-Centered Results-Based Accountability (RBA), a data fed methodology that starts with desired equitable results and works backwards towards the means that address root causes to ensure that agency plans work toward community results with stakeholder-driven implementation. The methodology defines achievements for racial equity and disrupts historic patterns of providing services without centering historically underserved groups. The training opportunities range from 2.5-hour introductory sessions to multi-month intensive cohorts.

Civil Rights Title VI Training

The Office of Equity developed multiple Civil Rights Title VI training modules offered throughout the year. These included a general Title VI training, a complaint training, and quick sessions focused on American Rescue Plan compliance. Presentation materials and recordings are available for staff on internal sharing platforms and the Office plans to build on and improve these trainings in the hopes of offering a recorded series accessible to staff at different levels available at any time.

Disability Justice and Intersectionality

The Office of Equity delivered multiple workshops to increase knowledge about the systemic oppression of people with disabilities in the United States and to examine its relation to racial oppression. This workshop covered the City of Portland's Disability Equity Goals and ADA Title II foundational practices.

Language Access Training

The Equity and Language Access Analyst, manager of the citywide Language Access Program, is a professional trainer and served on the Office of Equity's training team for many years. Providing Language Access training has always been one of the services provided to city staff by the Language Access Program. An inherent part of how technical assistance and guidance is provided to city bureaus, the following groups have been provided language access specific trainings by the Language Access Program manager:

- Unified Communications Steering committee (includes city communications Directors and Council offices Comms Directors)
- Emergency Coordination Center Command (leadership level)
- Joint Information Center (Emergency communications including city Public Information Officers and city bureau communicators)
- Citywide timekeepers (Language Pay Differential training)
- Diverse and Empowered Employees leadership (Language Pay Differential training)
- Equity Managers
- Water bureau language access group
- Bureau equity team staff assigned language access specific roles

All interactions with city staff seeking language access advisement receive training and guidance based on national best practices, community stakeholder input/data, Federal guidelines and thresholds, and in accordance with Civil Rights laws and corresponding executive order 31366.

ADA Title II Training

The Disability Division of the Office of Equity and Human Rights provides multiple opportunities for training throughout the year. Trainings range in topic from effective communication, making digital contact accessible, creating accessible PDFs, creating accessible word documents, internal trainings for bureau ADA coordinators on

using the ADA accommodation form and ADA complaint form, trainings on entering data into the Transition Plan data base, along with numerous specified trainings for work groups wanting to do a deeper dive on ADA Title II compliance for their bureau.

Human Resources 2.02 Workplace Harassment, Discrimination, and Retaliation Prohibited Series

All City employees are required to complete trainings on HR Administrative Rule 2.02 Workplace Harassment, Discrimination, and Retaliation Prohibited rule. After the initial two- hour classroom has been completed, a refresher training is available. This training is required every three years. Managers and supervisors are also required to complete 2.02 training specific to their roles and responsibilities in understanding and complying with 2.02.

Training and Education Resources for Staff

The Office of Equity provides several different resources for staff through internal sharing platforms and on our website. We are currently building out the Training and Education page with additional information [the page is currently inactive and will be accessible once the update is complete].   Civil Rights Title VI presentation and training materials are and Anti-racist RBA materials are provided in different sections of the Equity and Title VI Best Practices and Resource Page.

FY 2021-2022 Reporting Period Activities and Accomplishments

Civil Rights Title VI and ADA Title II Complaint Process

Over FY 2021-22 the Office of Equity and the City focused on activities to support bureaus, manage complaints, build capacity in resolving complaints, and provide enterprise-level solutions for easier processing and tracking. These include:

- Updating guidance and resources for staff, including the guidance manual, process flow charts and an explanation of roles. These are available in the Title VI Complaints section on the Equity-Title VI Best Practices and Resources page and on the Complaints section on the ADA Title II Resources page.
- In July 2021, the Office of Equity provided a 3-hour training on managing and resolving Civil Rights Title VI and ADA Title II Complaints. Over 30 key staff attended, and a recording is available for staff on an internal sharing platform. The module introduces staff to basic Civil Rights Title VI and ADA Title II purpose, concepts, and vocabulary; provides and overview to the complaint process and responsibilities; troubleshoots and goes over some basic scenarios for complaint management and resolution.
- In May of 2022 the City Launched an enterprise solution for central intake and tracking of ADA Title II and Civil Rights Title VI complaints. The single point of contact allows all complaints to be taken in and referred out to bureaus involved in the complaint. The mechanism for referral also allows records of complaint management to be logged and tracked for a for future use in analyzing compliance efforts and identifying service gaps.

Title VI and Title II Investigations, Complaints, and Lawsuits during reporting period

Bureaus and Offices referencing this update and providing federal or state reporting must provide a log of discrimination complaints during the reporting period. They may also need to provide information on lawsuits or complaints investigated by external agencies depending on reporting requirements. Bureaus should provide a brief description, log of complaints, and indicate if none were received during the reporting period within each category. Include,

- Investigations by External Agencies
- Lawsuits
- Formal Discrimination Complaints - Formal complaints submitted to the City of Portland were received, applicable under our complaint procedures (fall under jurisdiction of the City of Portland and Title VI or Title II) investigated, and resolved by City staff. Table 1 below lists formal complaints received during the reporting period. [Bureaus/Offices insert table or indicate if no complaints were received]

Equity and Civil Rights Title VI

Training

- **Racial Equity 101**. For FY 2021-2022, 39 Racial Equity 101 trainings facilitated for City of Portland employees; 730 City employees enrolled and completed Racial Equity 101.
- **Anti-Racist Results Based Accountability.** Partnering with the firm Equity and Results, the Office of Equity hosted four 2.5-hour RBA 101 Sessions throughout FY 2021-22. Additionally, the Office provided a 10-session cohort to provide coaching on the application of equity centered RBA and developing equity plans. Approximately 16 bureaus and over 60 staff participated in the cohort, which included large groups sessions, cross bureau cluster sessions and individual bureau coaching.
- **Civil Rights Title VI and ADA Title II 3-hour Complaint Training.** See above.

- **Civil Rights Title VI Training.** In April 2022, the Office provided a 3-hour general Title VI training inviting key staff from all the bureaus. Training covered background and an overview of Civil Rights Tile VI; the Equity and Title VI program; different roles and responsibilities; data, decision-making, public engagement, reporting and other civil rights program areas and/or requirements of the City; and various procedures, practices and supports to guide efforts. The training was recorded, and the office intends to build on it for an electronically accessible general training for staff.
- **Civil Rights Title VI Briefing for the American Rescue Plan Project Teams.** In December 2021, the Office provided a condensed 30-minute version of the general Title VI training with a focus on documentation and reporting for the American Rescue Plan Project Teams.
- **How to include demographic data in your data collection strategy.** In 2021, the Office of Equity presented at the Cities Open Data Day. The presentation briefly described the importance of data in equitable governance and community-centered data-driven decision-making and described the demographic data standard for collecting equity data in the City.

Tools, Resources, Guidance, & Support

- **Demographic Data Standards Guidance.** The Office released our [Race, Ethnicity, Language, Disability, and Tribal Affiliation Demographic Public Data Collection Recommended Standards Guide](). The purpose is to establish minimum, uniform standards for common and consistent categories and processes for public data collection in the City of Portland. Standardized demographic data collection methodology will allow the City, Bureau, community stakeholders, elected officials, and other decision makers to better recognize, address, target and eliminate inequities experienced by distinct racial, cultural, and linguistic communities, and by people with disabilities. Based on local, state, and national best practices, these standards allow the City to meet federal reporting expectations and the need for robust, comprehensive data collection and analysis; compare the City's progress with national and local trends; aid our ability to design effective, data-informed policies and services; improve quality service delivery; ensure equitable allocation of resources; and institutionalize practices that can help us achieve a range of our Equity, Justice, and Civil Rights goals.
- **Resource/Tools Dissemination**. We updated our [Equity-Title VI Tools and Resources]() hub. This page includes links to different racial equity analytic tools, data sources, Title VI presentations, RBA resources, community plans and reports, external sources, and complaint resources. This is intended to serve as a hub for tools, practices, and information to help the city and bureaus meet the requirements of Title VI, related executive orders, and advance equity through City government.
- **Hiring**. In 2021, the Office of Equity hired an Equity Data Analyst on the Civil Rights Title VI team. This position is described in the organization staffing and structure section.
- **Data Atlas**. The Equity Data Analyst organized and worked with partner bureaus to develop an Equity Data Atlas which centralized knowledge of, and access to administrative data and reports throughout the City of Portland. The atlas provides an inventory and links to different data portals, matrices, reports, maps, surveys, directories, assistance programs, etc. The purpose is to help support and coordinate equity data work.
- **Equity and Diversity Data Practitioners Team**. Office organized and convened a regular meeting of equity data practitioners from across the City to share resources, best practices, and data work.
- **Consulting and Technical Assistance.** Over the year FY 2021-22 the team has provided over 100 consultations, technical assistance, or provided guidance to bureaus, project teams, or Council Offices.
- **Racial Equity Plan Updates**. Multi-year project from 2021 through 2023. Reporting will be ongoing. See project description in upcoming goals.

- **Citywide Equity Outcomes, Indicators and Data Portland.** Ongoing project since 2020. See project description in upcoming goals.

American Rescue Plan Delivery and Compliance

Please see Appendix 1 for an overview of ARP LFRF performance and delivery and compliance activities.

Language Access

- Provided well over 100 instances of technical assistance and guidance to city bureau leadership, Council offices, and bureau staff
- Provided implementation support on language equity tools, resources, guidance documents, and operating procedures
- Integrated language access and civil rights guidelines into emergency response operations and communications
- Served as equity and language access advisor on regional emergency and disaster messaging committees
- Equity and Language Access Analyst recruited to serve on Equity committee of the Regional and Disaster Preparedness Organization.
- Created multiple citywide processes for implementation of Language Pay Differential Policy
- Provided training and advisement on Language Pay Differential Policy implementation
- Provided training and advisement on implementation of language access standards, best practices, tools, resources, guidance documents.
- **Language Pay Differential Policy and implementation**:
  - Trained the HR leadership team on the policy
  - Convened and lead the HR leadership group along with the Office of Equity's Director on the policy and plan for implementation
  - Sequenced the necessary phases of implementation
  - Planned and designed new citywide processes needed under each implementation phase
  - Created the citywide processes and forms
  - Created and distributed the citywide communications
  - Designed and distributed the citywide survey
  - Coordinating the data collection for the citywide survey
  - Sole contact for entire city workforce – answering large volume of emails with questions about the policy's eligibility process
  - Provided advisement to Human Resources while they set up the work scope with the testing agency
  - Provided advisement based on policy development process regarding level of proficiency the testing agency will test for
  - Conducted research on the recruitment language used by other municipalities. Created recruitment language using the research and provided the scenarios and language content to HR recruitment team in order for that team to have a foundation and research to work from

ADA Title II

- Hiring of Digital Access Coordinator and Disability Data Analyst
- Launch of 311 ADA Title II request and complaint forms and centralized referral system
- Successful completion of remediation RFP
- Successful budget requests for $350,000 Self-Evaluation consult
- Successful budget requests for ADA Title II/ Civil Rights Title VI Investigator.

Upcoming Goals, Plans, and Activities for Fiscal Year 2022-23

In the next reporting period, the Office of Equity and Human Rights plans to accomplish goals highlighted below to further advance City of Portland equity goals and ensure all City offices and bureaus follow Civil Rights Title VI, EO 12898, EO 13985, Language Access, and ADA Title II regulations and laws.

Equity, and Civil Rights Title VI

- **Hiring Vacant Positions**. The Office will recruit and hire for the vacant positions within the program including the Civil Rights Title VI Analyst, the Equity and Diversity Data Analyst, and the Equity Strategies Analyst.

- **Complete Update of the Racial Equity Plans**. The Office will continue to support the development of bureau Racial Equity Plans, scheduled for completion in the summer of 2023. The Office will take the plans, citywide summary, and reporting schedule to Council for acceptance in summer/fall of 2023. These plans serve as a key component of Civil Rights Title VI Plans and provide a basis for planning for and demonstrating non-discrimination and equity in public services and impacts.

- **Citywide Equity Outcomes, Indicators, and Data Portal.** The Office will continue work on the Citywide Equity Outcomes and Indicators project. To more fully enable the City to deliver on our goals of creating a just and equitable Portland, the Office of Equity will continue to establish shared, community-level, equitable outcomes, and indicators for the City to organize and align around for: medium to long-range equity planning, design and decision-making, investment, and performance management and accountability. We will identify and describe approximately six high-level, equity outcomes statements that align with City and community plans, select population-level indicators to measure current conditions and monitor changes and/or progress (providing success measures and baseline data), and develop report and data portal or visualization hub for information sharing and connecting to other work. The data portal will provide the City with meaningful demographic data, conditions, and disparities data bureaus can use to inform planning, decision making, and engagement, helping meet our compliance requirements and providing a framework for reporting and performance management.   The Office of Equity will continue working with BPS, equity managers, and the Budget Office to identify appropriate metrics and build public equity indices, spatial mapping, and dashboards.

- **Start Update of Civil Right Title VI Plans.** The Office will continue to plan for and scope the Civil Rights Title VI Plan update. Using an outcome-based and performance management planning approach through the Racial Equity Plans Update and Outcomes projects, the Office of Equity and partners will then establish a new Civil Rights Title VI Plan structure and bureaus will update implementation plans that feed into a Civil Rights Title VI and Racial Equity citywide plan. We may explore consulting options for plan development and bureau support.

- **Civil Rights Title VI Training Module**. Using the general training (described in accomplishments for the reporting year) develop an electronically accessible Title VI training module(s) for staff. The Civil Rights Title VI Analyst will work with the training team to determine the best strategy and materials. Team may develop introductory and advanced modules.

- **Civil Rights Title VI Bureau Coordinators.** Depending on hiring process, the Title VI Analyst will identify, convene, and train Title VI Coordinators for every bureau. They will conduct regular meetings with liaisons to discuss bureau Title VI plans and progress, create a community of practice on policies, procedures, and practices to meet general requirements, and develop solutions to issues as they arise.

- **Racial Equity Toolkit Redevelopment**. The Racial Equity Toolkit (described above) was designed to help staff achieve this mission by applying an equity lens to our work. The current toolkit requires an update that considers and provides a suite of different "tools" to use in different ways, at different levels of complexity,

and at different stages of the initiative or administrative lifecycle. The Office plans to update it to reflect new practices, content, resources, and design in a way that makes these tools interactive and usable.

- **American Rescue Plan Delivery**. The Office plans to continue to support Equity and Title VI compliance in the American Rescue Plan Projects Delivery including providing training and guidance to project teams, consulting teams on project design and performance monitoring, developing any needed tools for project design, contributing to federal reporting, and developing systems for effective and equitable delivery. The Equity Strategies Analyst and the Civil Rights Title VI and Equity Manager are both part of the Data and Equity Strategies Team within the ARP Delivery Team.

- **Reporting System**. Continue to connect with the SmartCitiesPDX team, ARP delivery team, the Bureau of Technology Services, and the City Budget Office to explore upcoming data sharing and infrastructure opportunities to better support Civil Rights compliance, reporting, and performance management.

- **Dissemination of Resources, Tools, and Practices.** The program team will continue to update the Resource page and internal information sharing hubs.

- **Equitable Development and Anti-displacement Investment Tool and Framework**. Since the completion of the ADAP Foundation report, multiple bureaus have been working together to turn the report recommendations into products that give city staff the tools they need to not only understand the dynamics of displacement in their own work, but to also understand how to make everyday decisions that can help build stable and resilient communities. The Equity and Civil Rights Title VI Manager team will continue to work with the Bureau of Planning and Sustainability, the Bureau of Transportation, and other bureau staff on this work, including developing a shared analysis and framework of what projects have displacement influences and why, and possible strategies moving forward.

Language Access

The Equity and Language Access Analyst will edit into final format a suite of standard operating procedures. Many were in final format but since city council has adopted the citywide language access policy, that information needs to be incorporated as well as remote access options incorporated into SOPs (i.e. working with an interpreter, working with community engagement liaisons). The Equity and Language Access Analyst is responsible for the Factor 1 demographic analysis process which includes writing guidance for the resource and accompanying mapping tools for usage by city staff. For the Factor 1 analysis refresh, the Equity and Language Access Analyst is responsible for convening and leading a multibureau project team which includes a jurisdictional partner in order to provide important regional data and tools for incorporating language equity and civil rights thresholds into decision-making, planning, policy, program, services, activity, and community engagement. This project is currently underway. The Equity and Language Access Analyst will convene and train the first group of the citywide language access liaisons in August 2022. The Equity and Language Access Analyst is also responsible for all webpage content including creating a section where city staff will be able to easily access all the Citywide Language Access Program's resources, standard operating procedures, tools, guidance, and recommended best practices and community engagement strategies for use in the institutionalization of language equity into city operations and policy, planning, and decision-making including resource and budget allocation. The program manager will reengage with the 311 program to advise on implementation of process for language access requests from the public, and support the programs multilingual staff who receive the language pay differential in order to proactively remove barriers for LEP community members contacting the city through 311. Groups that will receive language access training in FY 2022-2023 include:
- City Council offices
- ARPA project team managers
- Citywide language access liaisons

- City bureau Directors
- Equity managers (due to so many new hires who have not received the training)
- 311 staff and management
- Office of Equity staff including fellow civil rights team members and bureau leadership
- City Attorneys

ADA Title II

- **Self-Evaluation Plan.** The Disability Division will hire a consultant to launch a two-year project to create a Self-evaluation Plan and an update of The Transition Plan.
- **Digital Access Policy.** The Disability Division will continue to push to partner with The bureau of Technology Services to create a City-wide Digital Access Policy based on DOJ, WC3 and 508 guidelines.
- **Hiring of Civil Rights Investigator.** The city has funded a limited term position to focus on ADA Title II and Civil Rights Title VI complaints and training.
- **Continued digital access training.** The Disability Division will continue to provide effective communication and digital access training. Provide office hours support on a weekly basis for bureaus wanting to make their digital content accessible.
- **Launch of citywide remediation contracts.** The Disability Division has established two service contracts for bureaus wanting to do document remediation.
- **Launch of Disability Community Engagement Liaisons.** Working with the Office of Civic Life, The Disability Division has created an opportunity to hire native screen reader users to help bureaus identify web content issues.
- **Continued coordination of Bureau ADA Title II Liaisons.** The Disability Division will continue to meet and train Bureau ADA Title II Coordinators as well as assist bureaus in hiring ADA Title leads for their bureaus.
- **Response to 2021 Audit of lack of disaster preparedness for People with Disabilities.** The Disability Division will continue to address needs highlighted in the 2021 audit.
- **Continued support of PDX Wav.** The Disability Division will continue to work with the private for hire transportation department in trying to make access for people with disabilities more readily available.
- **Creation of disability data tools.** Collect and assemble Portland area disability data to be used as a tool in bureau decision making, planning, resource allocation.

Appendix 1: Promoting Equitable Outcomes, Centering Equity, and Complying with Civil Rights in the American Rescue Plan Local Fiscal Recovery Funds

[Appendix 1 content from the Annual Report, Delivery Team Guidance and Resources, and ARPA Round 2 Allocation Process Reports]

The COVID-19 pandemic has brought severe and prolonged public health, economic, and social impacts to Portland community members, organizations, and businesses. Through the Local Fiscal Recovery Funds program, the American Rescue Plan Act provides a major infusion of federal relief dollars directly to the City of Portland, allowing us the opportunity to act with both intention and urgency to deliver needed stabilization and care to our community.

Equity-Civil Rights Legislation & Toolkit

Very early in the pandemic, the Portland City Council established core values to guide its COVID-19 response. In a Council Resolution adopted on May 20, 2020, Council directed that the City's COVID-19 response center climate and equity and prioritize fiscal resiliency, equity, the needs of our vulnerable populations, and climate action in budget decisions.

 In this same action, Council adopted a [COVID-19 Equity Toolkit](#) to provide guidance in the development of policy, practices, and procedures related to our pandemic response. The Resolution additionally directed the City's Office of Equity and Human Rights to work with bureau-based Equity Managers and practitioners, the City Budget Office, and community partners to center the City's equity goals in our response actions.

The Equity Toolkit, shaped by input from more than 80 community-based partner organizations, is a guide and resource for City staff. It includes equity expectations and guiding principles; information about how to use a Results-Based Accountability approach in the design and implementation of response programs and actions; local disparities data and trends on high-risk populations; themes from community engagement; and about our legal obligations under various local and federal regulations.

This legislative action builds on previous City Council actions to advance equity. The body of legislation charted the course for prioritization of CARES resources and emergency response work and has guided City Council's allocation of Rescue Plan resources and project design/delivery over the last reporting year.

Use of Funds

Institutional barriers and systemic oppression have made Black and Indigenous communities, communities of color, low-income workers, people experiencing houselessness, older adults, and people with disabilities or underlying health conditions especially vulnerable to both the public health and economic impacts of the pandemic. The City has sought to center these communities in its budget, policy and programmatic decisions. The City of Portland is making community-informed investments in thoroughly vetted proposals to support equitable, durable recovery from the pandemic.

In March 2021, Portland Mayor Ted Wheeler directed his Chief Administrative Officer and the Executive Director Portland's economic and urban development agency to convene and chair the [Economic Relief and Stabilization Coordinating Council (ERSCC)](#). He charged this group with developing and recommending an investment

package for the City's first round of American Rescue Plan Local Fiscal Recovery Funds (LFRF). The investment package developed by the ERSCC was shaped by three guiding principles:

1. Ground process, priorities and outcomes in the city's Core Values of anti-racism, equity, in-language access, and transparency to ensure benefits for BIPOC communities and the most vulnerable Portlanders.
2. Prioritize investments on relief and stabilization activities that are informed by data and address houselessness and houselessness prevention, community health and safety, and COVID-19 economic challenges for individuals, businesses and communities.
3. Act as effective stewards of financial and other resources by ensuring the city can provide critical services, aligning investments with other public and private investments, including regional collaboration, and positioning community for longer term recovery.

City staff built on community input to develop Rescue Plan project proposals that were refined through a collaborative process among City bureaus and then considered by City Council staff in a series of large group conversations. This transparent dialogue helped shape an overall package that is aligned with City Council priorities and responsive to community-identified needs.

The ERSCC-proposed investment package supports projects in three investment priority areas: community health and safety; household stabilization; and business and commercial district stabilization. These investment areas were identified both by community and by independent economic analysis, and affirmed by the City Council, as top priorities for the City's COVID-19 response. Embedded throughout the investment package is a commitment to building capacity for community-based partner organizations and improving partnerships with these groups.

City Council allocated Round 1 SLFRF funds in two actions: roughly $40 million in the City's Fiscal Year 2021-2022 budget, and roughly $64 million on July 28 in a separate budget action. Round 1 projects support local households, neighborhoods, and businesses to stay stable, healthy, and connected as we move through ongoing impacts of the pandemic and into recovery. Additionally, City Council allocated a portion of funds to revenue replacement to ensure continuity of important City services, and to program delivery to support successful implementation of this grant.

Proposals considered as part of the July 28 action were required to identify how the project would result in equitable outcomes, the project's impact on communities of color, how the project will implement the COVID-19 Response Equity Toolkit, and provide accessibility to the project benefits. The Office of Equity reviewed these proposals, along with numerous other stakeholders, and provided comments on which proposals were more aligned with the Equity Toolkit and which proposals needed more development or discussion. This information was a key consideration for the City Council as they reviewed proposals.

Based on the City's deep engagement with community beginning in 2020, and City Council's direction to center equity and climate goals, the City's investment package prioritizes people and communities most affected by the devastating economic and social health impacts of the pandemic: Black, Indigenous, and People of Color households and workers; immigrants and refugees; people with disabilities; people experiencing houselessness; and small businesses, especially those owned by people of color. Nearly all of our programmatic investments are in the Negative Economic Impacts (EC 2) or Services to Disproportionately Impacted Communities (EC 3) categories.

In addition to Rescue Plan LFRF funds, the City of Portland is in receipt of Emergency Rental Assistance funds which we passed through to our network of 40+ culturally-specific and community-based organizations to do intake, case-manage, and provide rent assistance to households most in need. Additionally, the City received

Community Development Block Grant, Emergency Solutions Grant, and funds for Housing Opportunities for People with AIDS through the CARES Act. Together, these funds have supported investments in expanded winter shelter capacity; rent assistance; supportive services; safe motel shelter; street outreach; and support for contracted service providers, including hazard pay for frontline workers.

 Our investments will stabilize our families, protect Portland's unique economy and our most vulnerable neighbors from the worst impacts of the pandemic, and support in ways that lay the foundation for an equitable, safe, sustainable economic recovery.

 As of March 31, 2022, Rescue Plan investments have served:

- 1,510 individual recipients
- 80% individual recipients identifying as Black, Indigenous and People of Color
- 24 nonprofit partners
- 51% non-profit partner board and staff identifying as Black, Indigenous and People of Color
- 15 business partners
- 40% business partners (those helping to implement Rescue Plan projects) with owners who are Black, Indigenous and People of Color

Round 2 Allocation Process

The Mayor's ARPA guidance included the same four Council Priority Areas that apply to General Fund budget requests: Community Safety, Economic Stabilization and Recovery, Houselessness crisis, and Livability. The guidance also indicated the proposals would be prioritized based on their ability to support a bureau's performance and customer service, that all proposals should advance the City's racial and disability equity goals, and that proposals that further climate and resiliency goals would also be prioritized. Finally, the guidance included a requirement that proposals have output and outcome performance measures, and that cost per service measures could make proposals more competitive.

Modeling the evaluation process on the Round 1 ERSCC process, starting in February 2022, reviewers from OMF, CBO, and the Office of Equity and Human Rights (Office of Equity) each reviewed the detailed proposals that were submitted and screened them for eligibility for ARPA resources, equity, and financial sustainability, respectively. Round 2 proposals also received a climate impact review from the Bureau of Planning and Sustainability (BPS). To embed equity into program development, understand intended outcomes and results for vulnerable populations, and guide assessment and selection, new proposals were asked to respond the adapted COVID-19 Response Equity Toolkit questions:

- Considering information in the COVID-19 Equity Toolkit - including CDC high-risk populations, local disparities data, and community input - is this program prioritizing those most impacted by the COVID-19 health pandemic? If yes, please describe the communities receiving project benefits. If no, describe why.
- If you answered yes to question 1, how will these communities benefit, i.e. how will they be "better off"? Review GARE's resources about selecting measures to assess a project's intended impact.
- If you answered yes to question 1, in what ways will those communities be better off, and can those ways be measured? Will these measures be disaggregated by race/ethnicity, income, gender, disability, and/or geographic location? Describe challenges you may have in disaggregating these measures.
- Will the project ignore or worsen existing disparities, or produce other unintended consequences for BIPOC and vulnerable communities including people living with a disability, national origin, and/or gender? Please describe any data being collected to identify disparities, unintended consequences, or denial of benefits.

Equity

Score		Explanation
Green (1)	✅	Indicates the proposal, as described, substantively supports equity goals, centers equity, focuses on equitable outcomes, utilizes a targeted universalism approach, provides some form of relief for communities who have been most impacted by the pandemic, and meets community priorities and needs.
Yellow (2)	⚠️	The proposal potentially supports equity goals. However, reviewers identified concerns or issues with the proposal, or the proposal does not as clearly describe how the project centers equity or benefits those most impacted. Yellow projects may be equitable – and therefore, green – if designed and implemented in an equitable way. Alternatively, they may not necessarily be equitable (neutral), or may result in negative unintended consequences or impacts – and therefore, red.
Red (3)	🔶	The proposal does not advance equity goals, center equity, or necessarily benefits those most impacted, **OR** the proposal is scoped as neutral, and neither helps nor hinders equity.

Image A-1 provides an explanation of the Equity Scores for Round 2 project proposals. Each project was screened and given a score of Green, Yellow, Red, or Grey.

The Rescue Plan Round 2 Review details the results of the screening process. All reviewer scores were pre-viewed with proposers, with the invitation to discuss and respond to questions associated with the reviews. In many cases, the reviewers changed their scores based on responses from proposers. The screening results and proposals were provided for Council as they considered projects for Round 2 prioritization and funding.

ARP Delivery and Performance

As part of the City budget, Council approved funding for an internal team to support the delivery of Rescue Plan Local Fiscal Recovery Funds. This Delivery Team includes project management, equity strategies analysis, data and reporting analysis, procurement, grants management, communications, and government relations capacity.

The Delivery Team, with members from four bureaus, support overall compliance and success. They provide Project Teams with help, guidance, and tools to facilitate effective, accountable, transparent, equitable implementation. They also manage federal and local reporting. The team's priorities are to provide clear information about eligibility requirements and federal rules; share resources to support compliance with Rescue Plan rules and general Civil Rights obligations; answer questions, problem-solve, and route policy decisions; support Project Teams to consider equity in project design and implementation; partner on development of strong output and outcome measures; offer technical assistance and user guides related to reporting. The Data and Equity Strategies work group includes staff from the City's Office of Equity and Human Rights, Bureau of Planning and Sustainability, and Office of Management and Finance. This team has created a new framework – from project design through final reporting – for centering equity and complying with civil rights and for performance and data management of Rescue Plan projects. The framework ensures we meet federal reporting requirements, that we have a centrally-coordinated data management and performance system, that we are transparent and accountable to Portland communities, and that we are helping projects make progress toward equity outcomes.

This implementation support will help our project teams achieve their equity goals and report their progress transparently and accountably. Key elements and activities are provided below.

ARP Equity Outcomes

As part of this new approach, the Data and Equity Strategies Team established developed seven overarching equity outcomes guided by the concept of "targeted universalism," and connected each community-facing

project to one of the goals. Strong output and outcome measures allow us to track project progress toward these goals. These outcomes describe how ARPA funds will provide relief to the communities disparately impacted by the COVID-19 pandemic:

- All business operators in Portland, especially those hardest hit by the pandemic, feel supported in continuing to operate sustainably.
- All people in Portland have the skills and support to gain stable employment and afford basic life necessities.
- .
- All people in Portland have safe and inclusive outdoor spaces for recreation, business, and socializing.
- Artists who identify as Black, Indigenous, or people of color receive support and funding to continue to practice their art in Portland.
- All people in Portland feel secure and stable in their current homes.
- All houseless or unsheltered people in Portland are given stable and secure shelter with access to health services.
- All people in Portland are able to connect to resources and to one another via dependable internet and devices.

As part of the U.S. Treasury reporting requirements, projects that provide benefits to underserved communities are recommended to also provide disaggregated information (by race/ethnicity, age, gender, etc.) to help describe progress towards these intended outcomes and address any potential barriers in program delivery or equitable access to benefits.

COVID-19 Response Equity Toolkit Considerations and RBA Exercise:
Taking equity and civil rights-related resolutions, orders, tools, and guidance documents into consideration, the Data and Equity Strategies team met with the 27 projects receiving the first stage of funding to walk through questions adapted from the City's COVID-19 Response Equity Toolkit:
- Considering the information in the COVID-19 Equity Toolkit, including CDC high-risk populations, local (Multnomah County and Oregon) disparities data, and what we're hearing from community, is this relief prioritizing those most impacted by the COVID-19 health pandemic?
    - Please describe the communities who will receive this relief.
    - Please describe how these communities will benefit from this relief (how will these communities be "better off?"). Visit GARE's resources on how to select measures for assessing a program's intended impact.
    - Please describe how these "better off" measures will be evaluated (in what ways will program participants be better off and can those ways be measured?). Are these measures disaggregated by race/ethnicity, income, gender, or geographic location? Please describe any challenges you may have in disaggregating these measures.
- How will your program track compliance with Title VI of the Civil Rights Act (i.e. number of complaints filed and resolved, use or planned use of bilingual employees serving beneficiaries of the program, or a description of the services provided by the program and if any persons were denied these services on the basis of prohibited discrimination)? Please describe.
- Please describe how your project has accounted for meaningful access requirements (refer to the Effective Communications Guide/ADA Title II and Language Access Guidance for COVID-19 Response Efforts).

 Each project team was asked to provide insight into which how their project considers economic and racial equity as goals, how vulnerable or disparately impacted communities will benefit, and intended community outcomes, and engaged in brainstorming how these results or outcomes can be measured through data collected by the project team. In addition to these questions, which were focused on direct positive results for

community as guided by the Results-Based Accountability Framework, the exercise also asked project teams to describe plans and prepare for Civil Rights Title VI compliance, Title II/ADA and language access considerations (including plans to serve underserved or adversely affected communities, identify and address potential challenges in bringing awareness and access).

Refine measures through coordination

Following the Equity Toolkit exercise, the DEST team continues to collaborate with project teams to:

- Ensure data collected is tied to outcomes
- Make recommendations on data collection methods and equity strategies
- Align data with Data Standards and Reporting Guide
- Ensure every team has a table of final reporting measures for quarterly and annual submissions
    - Provides clear expectations for Project Teams & partners

Using both output and outcome measures lets us record both progress and impact. Together, this information helps us understand who is being served, how we are serving them, and whether our projects are having the impact we hoped they would.

City Reporting Guide

The Data and Equity Strategies Team has worked to establish a single, standard approach to reporting. This approach meets US Treasury requirements and Portlanders' expectations for clear, accessible information about City programs and services. The reporting guide and system outline clear reporting requirements and values:

- **Compliance** - Meet all federal grant requirements.
- **Transparency** - Build trust & show progress throughout duration of projects. Communicate data collection responsibilities and purpose of data to all partners.
- **Accountability** - Demonstrate how projects connect to priorities.

The DEST provides ongoing tools and support over the life of the program that allows Project Teams to focus on delivering effective, successful projects. Ongoing meetings between Project Teams and the Data and Equity Strategies Team help make sure metrics and outputs connect to equitable outcomes. The DEST builds on existing data systems or standards project teams already use and coordinates these various systems to produce one overall dataset for the program.

Data Standards

Data Standards are provided for required reporting in City of Portland Rescue Plan Local Fiscal Recovery Funds (LFRF) Projects. City of Portland project teams, including project subrecipients and contractors, are required to use the standards for reporting data. Data standards are provided for output and demographic data collection and are informed by the Office of Equity and Human Rights, Oregon Health Authority REALD standards, and other regional sources. The use of uniform standards improves the usability of the data for storytelling across Portland Rescue Plan projects connected to equity outcomes. These methods also support streamlined implementation, provide proactive and clear expectations with partners collecting data, and more efficient data management and analysis.

To uphold the City's core values of anti-racism and equity, and to comply with Civil Rights requirement, we must understand where and to whom relief is provided. Geographic and demographic data disaggregation -- meaning data is able to be broken down into categories and/or mapped by specified geographic areas -- is also required by US Treasury for most projects. To meet this federal requirement, and align with our local values, we are requiring consistent spatial and demographic disaggregation for each project. This approach allows us to provide

community members as well as policy- and decision-makers a complete, transparent picture of the project impacts.

Ongoing Collaboration, Guidance and Support

The Delivery Team and key delivery partners provide ongoing collaboration and support. The DEST Team, Equity Strategies Analyst, Civil Rights Title VI and Equity Manager, and Title VI Analyst provide guidance to project teams to ensure projects meet their equity goals and compliance requirements. Guidance is coordinated with Language Access and ADA Title II Teams depending on Project Team need.

- Provide Project Teams with a template and guidance for inclusion of Equity, Nondiscrimination, and Access Statement.
- Share guidance and provide technical assistance on language access and access for people with disabilities.
- In December 2021, the Title VI Analyst provided a brief overview presentation of Title VI of the Civil Rights Act, related regulations, basic requirements, and Equitable best practices to Round 1 Project Teams.
- Provided a Data Submission Guide
    - How, when, and where to submit data
    - Outline data reviews that are project manager's responsibility
    - Data review process with our team & project teams
- Provide data file examples for several scenarios
- Host office hours to discuss and review data
- Build and review data collection forms
- Coordinate the ARP reporting and metrics with concurrent efforts such as bureau-specific Racial Equity Plans. Our goal is to build on good work already done at the bureau level and Citywide, and to leverage the data collection and reporting for these funds to continue improving our overall system of programs and services.

Language Access Resources

Through the American Rescue Plan, the City allocated each participating project with an additional Language Access & Equity Budget of $5,000 to ONLY be applied for multi-lingual translations and interpretation.

Equity and Civil Rights Compliance Survey

In support of City compliance with Civil Rights requirements, Rescue Plan Project Teams shared additional information about their work related to equity and civil rights through a survey developed by the Data and Equity Strategies Team and partners at the Office of Equity. Additional survey support was provided to Teams through weekly office hours. Project teams were asked, if applicable, to record the following information:

Project Design, Meaningful Access
- Please describe how engagement with impacted communities informed your project's goals or design.   - Please describe any equity- or impacted community-related data, research, analysis, or analytic tools that informed your project's design and/or delivery. (The RBA exercise we did together early on is one example, and because we have a record of those meeting notes you do not need to reference it below.)   - If applicable, please describe how outreach or engagement will ensure equitable access to your project.
Language Access
- Is information about your project available in multiple languages?   - Please describe how you will engage communities whose primary language is not english.   - Please describe how you have used or will use language services for translation, interpretation, or other services to increase language access.
ADA Title II

- Please describe how you considered physical and programmatic access for people with disabilities.
- Please describe how project information is accessible to people who are deaf, blind, and/or people with intellectual or cognitive disabilities.
- Please describe any engagement with disability organizations or disabled community members.
- If you have hosted or will host events, how have you considered people with disabilities accessing the space?

Civil Rights Notification

- Does your project notify the public of their nondiscrimination rights and how to file a complaint?
- If yes, how does your project provide the notification described in question 12?
- Are your project's contractors and/or subrecipient partners aware of their nondiscrimination and equity obligations?
- If yes, how have you provided the notification described in question 14?

Compliance Logs
Comprehensive civil rights compliance tracking includes logs of specific activities or records. This includes discrimination complaints, ADA Title II requests for accommodation or access, and language access services. It is important to track this through the life of your project.

Discrimination complaints
311 records can be used for civil rights reporting. If your project cannot use the 311 system for this, please attach a spreadsheet or table with the following information for each complaint:

- Project name
- Date (DD/MM/YYYY)
- Complainant name (Last, First)
- Complainant contact information
- Complaint basis (e.g. race, ethnicity, national origin, limited English proficient, Disability)
- Complaint detail (brief description)
- Summary of findings, resolution, or corrective action (brief description; indicate whether investigation is active and ongoing)

ADA Title II
311 records can be used for civil rights reporting. If your project team cannot use the 311 system for this, please attach a spreadsheet or table with the following information for each request

-Project name
- Date (DD/MM/YYYY)
- Requestor name (Last, First)
- Contact information
- Request detail (brief description)
- Summary of access provided (brief description)

Language access services
Please attach a spreadsheet or table with the following information for each language access service or activity:
- Project name
- Language access type (bureau-initiated or public-initiated)
- Date (DD/MM/YYYY)
- Name of person making request, if applicable (Last, First)
- Staff contact (Last, First)
- Type of contact (phone, in-person, written, meeting/event, or other (provide description if other))
- Language

- Type of service (spoken, written)

Data Management Strategy and End-to-end Data Pipeline

The Data and Equity Strategies Team developed workflow of tools and strategies to move and combine data from various sources to prepare analyses and share findings. This applies to all stages of the data lifecycle and the workflow was informed by community insights and City core values. To mitigate disparate harms that can be perpetuated or arise from data, the team engaged subject matter expertise and committed to shared values to supplement and manage the data pipeline to improve data impacts. This work over the reporting period included:

Data Cleaning and Storage

- Documentation of file management workflows
- Data cleaning
- Rescue Plan Database
  - o Data schema design considered initial query and data analysis needs to tell stories of impact and service
  - o Database connected to open data web services

Publicly Shareable Data and Analysis

- Explore data to draw out statistical narratives
- Build data visualization pages following UI/UX/Accessibility best practices
- Understand outcomes and outputs through analysis of reporting measures and community narratives
- Connect data pages to portland.gov/united and Rescue Plan Open data Hub platforms
- Partner with Smart City PDX Community Leads to design and engage with communities to improve data sharing. Including communities makes data sharing more impactful and useful for wide range of internal and external stakeholders
- Brainstormed design, what frontline communities they work with would like to see first from the project reporting data and what context is needed to improve accountability, transparency, and reduction of harm with data.
- Create and plan for engagement activities.
- Review reporting to US Treasury, Council, and community to ensure equity is embedded in performance measures and metrics to measure progress, and the city is accountable and transparent about compliance and equity-related activities.

Publicly Shareable Data and Analysis: Portal

The Rescue Plan open data portal launched in June 2022. We believe data should be a community asset. Through the Rescue Plan program, the City created a new approach to performance and data management, and built new tools to share information transparently and accountably.

The data portal includes spatial and demographic information about who and where Rescue Plan investments are helping, the partners who are helping to implement projects — and how projects are advancing equity outcomes. The DEST will continue to add new analyses to highlight key insights about project progress and impact.

Key portal features include:

- Important context about what is and isn't reflected in the data – we hope you will read this carefully before exploring the data

- Initial analyses about who we are serving and how – for example, community profiles grouped by race and ethnicity and a partners dashboard with demographics and award information about all organizations partnering with the City to implement projects
- All data is available to download and explore on your own

Performance management is at the heart of our Rescue Plan SLFRF implementation strategy. We are committed to transparency and accountability about project and program progress and impact. We want to understand how each project, groups of similar projects, and the program as a whole are making progress toward Citywide and project-specific outcome goals.

Working back from that, we developed a new performance and data management approach to create measures, collect data, and share information with US Treasury, Portland community members, and local policymakers. Since August 2021, we have developed the following elements:
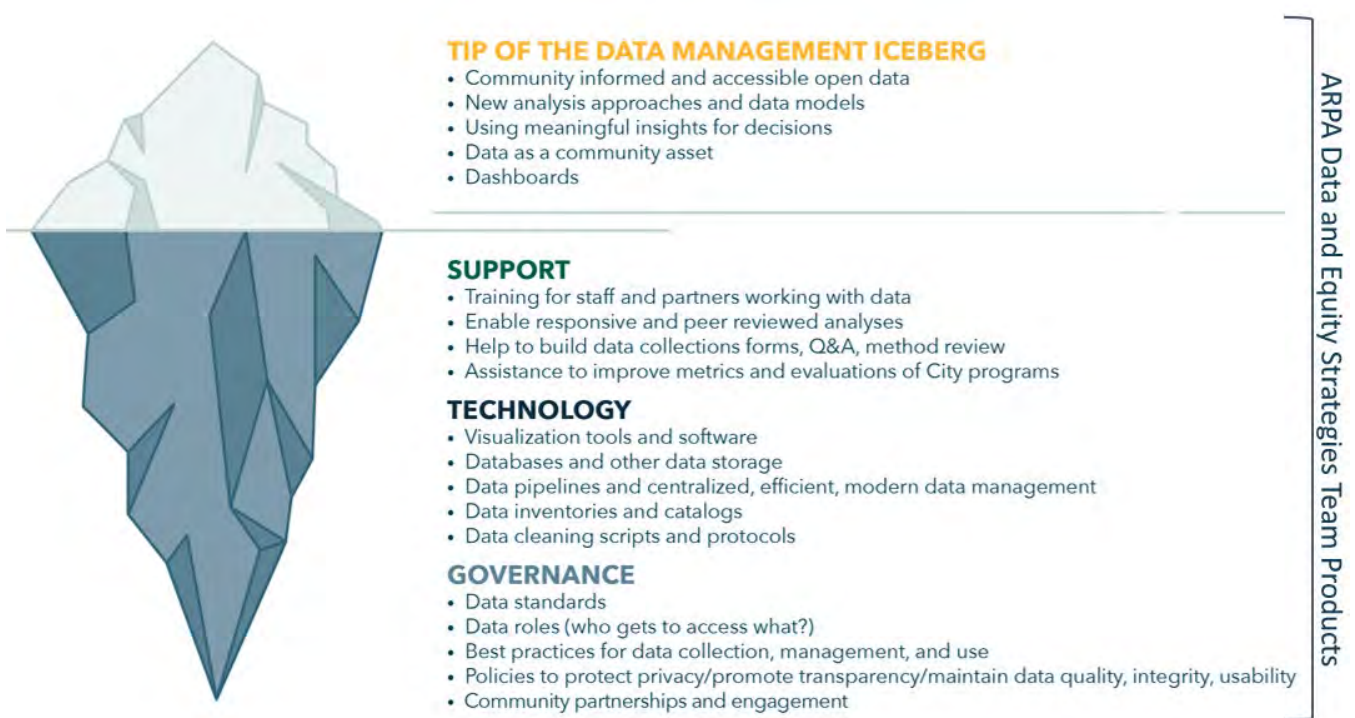

Image A-2 describes the ARPA Data and Equity Strategies Team Products, demonstrates how data management is comprised of a number of support, technology, and governance activities and deliverables listed out specifics of some of those activities.

This new approach is designed to produce the following results:
- *Data-driven decision-making*: decision-makers have clear, complete information to make good choices about future policies and investments
- *Invested community*: community has information and tools to understand the impact of City work, advocate for future investments, and hold the City accountable
- *Better projects*: City staff and community partners have information to refine their work for more impact, and incorporate understanding of impacts into future proposals
- *Clear impacts*: Everyone can understand the impact of individual projects and of multiple projects across larger areas of focus – consistent, connected data shows us the big picture

- *Increased trust*: Transparent, community-informed reporting builds trust with community, media, and other stakeholders

In action:
1. Project proposals were evaluated for alignment with policy and equity goals
2. Funded project scopes were reviewed through a results-based accountability lens to identify the project's intended impact
3. Reporting measures were developed to capture output and outcome information relative to the intended impact
4. Projects use consistent data standards and processes to ensure alignment and usability of reporting information
5. All data is submitted to a central location each quarter
6. Data is reviewed, cleaned, and loaded into a central open data website: Rescue Plan Open Data: Investing in Portland (arcgis.com)
7. Complete project datasets as well as community-informed analyses and visualizations are available on this open data website
8. Data can be analyzed on a project, project group, or program level to understand impact against a variety of reporting measures and City policy priorities

The Delivery Team will continue to support Round 1 Projects, work with Round 2 Projects, refine existing and build new tools, strategies, and practices to help make progress towards equitable outcomes, comply with Civil Rights Title VI, and be accountable to Portland communities. We are also committed to leveraging this grant to create performance management tools that will be useful beyond Rescue Plan. The approach we have built – and the processes and infrastructure to support it – was designed to be useful and replicable in other City contexts. We are excited to see what this data tells us, and see how it is used by community and policymakers in the months and years ahead.

Community engagement

The City's COVID-19 Equity Toolkit identifies community engagement needs as part of the Results-Based Accountability approach. This approach includes identifying ways project teams can authentically engage and inform impacted communities before making programmatic design and decisions. The process also highlights the need to understand historical relationships with impacted communities and identify how to rebuild broken trust.

Beginning in March of 2020, the City of Portland has intentionally engaged community organizations, leaders, and members to ensure that our investment decisions reflected community needs as defined by community, not just by policymakers.

City engagement has included both existing and new committees and focused audiences to ensure that we are leveraging expertise that's already plugged into City processes as well as bringing new insight and perspective to our work. For example,

- The City's Joint Volunteer Information Center, a partnership with more than 80 community-based partner organizations, helped shape the City's COVID-19 Equity Toolkit and included implementation partnership. These trusted community organizations helped both develop these responses and deliver them to community members.

- The City and its Economic Recovery Task Force, includes more than 70 external partners. This body has advised the Council about economic stabilization and recovery interventions, helping ensure that our investments respond to our community's specific needs.
- The longstanding Portland Housing Advisory Commission and the new COVID Rent Assistance Provider Network met monthly to provide guidance to the City's housing stability response.
- Conversations with Reimagine Oregon; a focus group of Black, Indigenous, and business owners of color; the City's Joint Volunteer Information Center; and the Street Roots Ambassador Program have also informed the City's investment strategy and allocations.

The City's SLFRF investments represent an opportunity to partner with a variety of community organizations – some who have existing relationships with the City, some who are new. Many project teams continue to collaborate with community partners in project design and implementation. We will use this opportunity to build capacity among our partners, including by providing training about what it means and how it works to be a sub-recipient of federal funds and/or a contractor with the City. Through the delivery of these funds, we hope to foster a cohort of community groups who are competitive for public funds, who are deeply rooted in and connected to community, and who can continue to partner with the City beyond the life of these funds.

Finally, we are committed to capturing community feedback as we implement Rescue Plan projects. Many projects will use surveys to measure project outcomes. These surveys are an opportunity to understand each project's impact, and to build on that learning with our next investments. Each outcome survey is a tool we can use to improve our approaches to deliver better services to community.