



**OFFICE of EQUITY
and HUMAN RIGHTS**
CITY OF PORTLAND

Commissioner in Charge:
Ted Wheeler, Mayor



To: City Auditor Mary Hull Caballero

**From: Koffi Dessou, Interim Director, Office of Equity and Human Rights
Mayor Ted Wheeler, Commissioner in Charge**

Date: November 30, 2021

RE: Response to the Audit *Emergency Management: Pandemic highlights City's long-standing neglect of people with disabilities*

Let this letter stand as the response from the Office of Equity and Human Rights. We want to first recognize that back in 1993 the city made a commitment to comply with the Americans with Disabilities Act. There have been many decisions and people long before this audit who have failed to resource and make a priority this work which is why we find ourselves here today. We can no longer put this on the back burner...the gaps in compliance reflected in this audit have potential life and death consequences for people living with disabilities in Portland.

Through this audit process we were told audits only point out what's wrong... They are not intended to give credit or acknowledge all of the hard work people have done. We don't disagree with the findings and recommendations of this audit. Unlike the audit we also want to acknowledge there have been many efforts since the Portland Bureau of Emergency Management (PBEM) was created in 2004 (it may be later) to integrate better inclusion of people with disabilities in emergency response.

The majority of those efforts came from a collaboration between PBEM and The Office of Neighborhood Involvement (currently Civic Life). During that partnership we saw the development of a training program (utilized by multiple cities), the creation of additional needs registry, and innovative pilot program to connect NET volunteers with people in their neighborhoods who might have challenges during a disaster because of disability, multiple trainings of first responders and the inclusion of people with disabilities in the emergency plans. The decision back in 2007 to create this partnership instead of housing all of the responsibility in PBEM came from the good intention that someone with a disability, with expertise in the field of disability would be a much better fit to guide the work. Even without protocols or MOUs the partnership worked well for a time. In fact Portland was the only jurisdiction in the 2016 regional disaster preparedness organization: Disabilities, Access and Functional Needs Inclusive Planning survey that had multiple efforts toward disability inclusion. Alas positions and priorities shifted and efforts and intentions that are not based on standards of best practice, codified, implemented, measured, and evaluated often fall short...and they did.

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Blame does not solely lie with PBEM, Civic Life or Office of Equity; it also lies with the Commission form of government where programs and services are siloed and the revolving door of employees has the cost of the loss of historical knowledge... The gaps in both compliance and serving the disability community have grown wider. Over the years the .5 FTE designated within Civic Life to work on these issues was watered down and then was recently eliminated without any conversation with partners and stakeholders. Every year we face inclement weather issues that impact the disability community far beyond any other and every year we sit down and try to improve our response but without dedicated staff a bunch of good conversations never turn into a concrete plan. In 2020 we faced the longest natural disaster to impact Portland. Even with five of the designated staff that work on aging and disability throughout the city being reassigned in the ECC we struggled playing catch up for decisions that were made and implemented before we got there and without us at the table.

So yes there are huge gaps in compliance not just at PBEM at the city in general and we can do better. There are also amazing people who are committed to not just ADA compliance but to the inclusion and elevation of the disability community. Many of the gaps pointed out in this audit can be fixed by a commitment from Council to resource the work of ADA compliance and disability inclusion with the funds and authority it should have had back in 1993. We believe the first and best step is to allocate the funds for a full-time position with knowledge and experience with ADA Title II and Disaster is emergency planning in response for people with disabilities. It is imperative that this position is given the authority to create update and maintain plans specific to disability and update and audit existing plans for compliance so they are inclusive of the access and functional needs of people with disabilities. We are committed to PBEM, the city and most importantly the community of people with disabilities to see this through for something better for everyone.