



PORTLAND BUREAU OF EMERGENCY MANAGEMENT

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To: City Auditor Mary Hull Caballero

From: Jonna Papaefthimiou, Interim Director, Portland Bureau of Emergency Management
Mayor Ted Wheeler, Commissioner in Charge

Date: December 3, 2021

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

Thank you for your work to prepare an audit of the Portland Bureau of Emergency Management's (PBEM) service to people with disabilities. We strongly agree that the City can and should do more to serve community members with disabilities, including helping people prepare for disasters. People with disabilities face unique risks in many emergency situations and have disproportionately negative outcomes following disasters.

We also appreciate the opportunity to respond to this audit. While we support many of the recommendations, we are disappointed that Audit Services chose not to include information we provided on PBEM's efforts to address equity in emergency management, or to acknowledge resource constraints within the bureau. We note that the companion report on citywide ADA compliance *City does not ensure Americans with Disabilities Act compliance* raises similar issues, but adopts a measured tone, and acknowledges resource constraints in other bureaus.

PBEM has made significant efforts to serve people with disabilities. During the recent COVID-19 pandemic response, PBEM:

- Partnered with 15 community-based organizations that specifically serve people with disabilities to meet urgent community needs for household supplies and hygiene items.
- Provided personal protective equipment (PPE) directly to community members with disabilities who needed items not provided in the state's PPE giveaway program.
- Created COVID safety videos in 27 languages and accessible formats.
- Created an Equity Officer within the Emergency Coordination Center, and actively sought their input on incident response objectives and tactics.

PBEM runs the largest community emergency volunteer program in the US. It known as the Neighborhood Emergency Team (NET) program.

- 7% of NET volunteers identify as a person with a physical disability and 3% identify as a person with a cognitive disability.

- PBEM regularly trains NET volunteers on how to assist people with disabilities in an emergency through lectures, classes, and training exercises. For example, in February 2021, PBEM held a 90-minute online training with paid expert Donna Harris called “Responding to Persons with Disabilities.” It was attended by 174 volunteers.
- Before COVID, PBEM organized more than 100 outreach events annually, and more than half of these events were in communities that identified primarily as Black, Indigenous or other people of color, or people with disabilities.

We disagree that the Bureau does not meet Department of Justice guidance, and we strongly disagree that the City “put lives at risk and exposed itself to lawsuits.” This assertion reflects a fundamental lack of understanding of City response roles and protocols. Other statements, such as “the bureau did not request resources to address these issues” are simply untrue. We regret that that Auditor chose not to correct these inaccuracies.

The audit also did not acknowledge resource constraints at PBEM, which receives less than 0.1% of the City’s annual budget. Many of the City’s response plans do need to be updated. PBEM has a very lean staff, and the COVID response pulled all bureau employees away from their regular duties to address urgent community needs. However, this reflects limited resources overall, and does not indicate a neglect of people with disabilities.

With respect to the Auditor’s specific recommendations:

1. ***We agree the Additional Needs Registry (ANR) needs to be reevaluated.*** The Office of Community and Civic Life is responsible for overall leadership and coordination of the ANR, but it has not allocated resources to the ANR for several years. Recognizing the risks of this situation, PBEM initiated efforts to address this in 2020, but the pandemic prevented the bureau from making progress. PBEM intends to follow up in 2022.
2. ***We agree that we should develop a plan with performance measures and milestones for incorporating best practices for disability communities into our written plans.*** We disagree that this should be a standalone effort. Disability work is not a special project but a part of the essential work of the bureau. PBEM will work to incorporate leading practices in disability inclusion during a forthcoming update to our strategic plan, as well as our annual work plans.
3. ***We support hiring an emergency management planner knowledgeable about the ADA.*** We intend to ask for resources to support this in the FY 2022-23 budget process.
4. ***We also support additional training for all staff on disability issues, including training on ADA best practices.*** We intend to ask for resources to support this in the FY 2022-23 budget process.
5. ***We agree and have already formalized the inclusion of an equity officer into the command staff at the Emergency Coordination Center.***
6. ***We agree with the recommendation that the Emergency Management Steering Committee and the Disaster Policy Council broadly hold PBEM accountable for disability equity.*** However, we disagree that these bodies can proactively or meaningfully advise on ADA compliance given their broad focus, diffuse membership, and infrequent meeting schedule. An ADA advisor

within the bureau can ensure that the work products that come to the DPC and EMSC already incorporate disability best practices.

7. ***We disagree that the bureau should undertake a special outreach program focused solely on people with disabilities.*** A dedicated outreach program is unrealistic given PBEM's resources and makes disability inclusion a special project rather than a core focus of our work. We will continue working to ensure our outreach is inclusive of people with disabilities.

We look forward to deepening our engagement with disability communities in Portland, and to working to implement some of the recommendations of this audit. We also have confidence that, in partnership with the communities we serve, we will find other, innovative ways to make the best use of our resources and to ensure the safety and resilience of Portland residents of all abilities.