Oregon City

DEI Assessment

NOVEMBER 2022

MGT PERFORMANCE

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Executive Summary

Methodology

The Diversity, Equity, and Inclusion (DEI) assessment consisted of a peer review of public sector agencies, an internal review of human resources policies and practices, an employee survey, employee focus groups, the facilitation of a community DEI taskforce, a community survey, and community listening sessions. The policy review was conducted through the collection of various HR policies related to six critical DEI categories: hiring and development, pay and promotion transparency, antidiscrimination, benefits, harassment and retaliation, and good faith efforts. Beyond MGT's policy review, opinions on the current state of DEI within the organization were solicited from the City's employees through an employee survey and two focus groups. In addition to employees' perceptions of the organization, MGT held a series of four community listening sessions and a community DEI survey to gather the community's perspective of the organization. The community DEI taskforce consisted of volunteers and nominees from the community. The taskforce met six times to discuss and learn about DEI-related issues.

Findings

Based on the methodology, MGT identified several key findings. MGT began with a policy analysis scored on MGT's proprietary rubric, which yielded a score of 3.73 out of 9. While this score may initially seem low, it is within the expected range for organizations at a similar point in their DEI journeys. This simply indicates that there is room to improve DEI efforts within the organization. Two of the highest leverage recommendations MGT identified within the policy analysis are increased standardization of both the interview process and the performance review process. These are areas of the employee lifecycle where unconscious bias can have an outsized impact on employees' careers and experiences with the organization. Additionally, MGT identified that the City would benefit from an expansion of parental leave offered to new parents. For additional information related to these or other policies MGT reviewed, please reference **Chapter: 2.3 SWOT Analysis of Documents.**

MGT solicited feedback from both employees and residents in the form of two separate surveys and a number of focus groups. The employee survey received 115 responses and asked questions about the workplace culture of DEI at the City. One critical finding was that people of color (POC) have a different and more negative experience than their White counterparts. However, 60% of employees surveyed stated that they do feel comfortable speaking about issues of racism, sexism, and LGBTQIA+ rights within the organization, which is a response level that would be appropriate for an organization at a similar stage in its DEI journey. Our survey also included open-ended responses which identified a need for more a comprehensive onboarding experience that embeds DEI training. MGT's focus groups with staff highlighted that there is a difference in experiences between City leadership and middle managers and validated many of the other findings detailed **in Chapter 3 Oregon City Staff Qualitative Analysis and Feedback.**

Recommendations

Based on MGT's experience with similar municipalities and general best practice regarding DEI initiatives, MGT would like to present the following recommendations that the City should consider implementing and including in their DEI Action Plan.

- Organizational development improvements
  - Clarify roles and responsibilities of middle management and upper management
  - Provide a safe space for middle management to speak freely
  - Elicit more feedback from staff on a regular basis in the form of a pulse survey
  - Identify staff responsible for change management
- Reinforce importance of cultural competency
  - Values based performance metrics should be implemented
  - Provide people managers with additional training
- Demonstrate commitment to understanding DEI at all leadership levels and within the community (middle management, executive leadership, and City Commission)
  - Develop comprehensive DEI training plan with increased emphasis for leadership through events, festivals, and other cultural celebrations
  - Provide educational opportunities for community members to learn about DEI concepts
  - Conduct outreach at local schools and with minority organizations to showcase the types of career opportunities at the City
- Conduct a community assessment to determine opportunity gaps and limitations in economic mobility and disparate treatment of people from historically marginalized communities

1. Peer Review and Best Practices

1.1 A Brief Case for Diversity, Equity, and Inclusion

Oregon City, Oregon (City) determined that a first step towards enhancing the culture of diversity, equity and inclusion at the City and the experiences of its residents would be for the City to undergo an equity assessment to identify areas in need of change and transformation within the organization and in the community. The City hired MGT Consulting to conduct an equity assessment and to develop an equity plan. The equity assessment consisted of an internal review of human resources policies and practices, an employee survey, a community DEI Task Force, and community engagement.

1.2 Definitions

This glossary contains definitions of common terms and acronyms used throughout the City's 2022 DEI Assessment. Additional and more detailed definitions can be found throughout the remainder of the report.

American Indian and Alaskan Native	U.S. citizens or permanent residents who have origins in any of the original peoples of North and South America (including Central America) and who maintain tribal affiliation or community attachment. This category includes people who indicate their race(s) as "American Indian or Alaska Native" or report an enrolled or principal tribe, such as Alaskan Indian (including Tsimshian Indians not enrolled in the Metlaktla Indian Community).
Asian	U.S. citizens or permanent residents who originate from the Far East, Southeast Asia, the Indian subcontinent.
Black or African American	U.S. citizens or permanent residents having an origin in any of the Black racial groups of Africa.
Demographics	Statistical data about the characteristics of a population, such as the age, gender, income, and race of the people within the stated population.
Digital Divide	This refers to the reality that continued access to the internet requires significant ongoing financial burden through internet subscriptions and frequent hardware updates. These financial burdens create two classes of people, those that have access to the internet and digital services and those struggle to consistently have it. The separation between these groups is referred to as the digital divide.
Diversity	While diversity is often used in reference to race, ethnicity and gender, there is a broader definition that also includes age, national origin, religion, differently abled, sexual orientation, socioeconomic status, education, marital status, gender expression, language, diversity of thought, non-physical attributes and physical appearance.
Economic Opportunity	The ability and opportunities available to an individual to build, maintain, and pass on wealth.
Equity	Equity is the practice of fair treatment, access, opportunity, and advancement for all people.

Hegemony/Hegemonic	The dominance of one group over another, often supported by legitimating norms and ideas. The term hegemony is today often used as shorthand to describe the relatively dominant position of a particular set of ideas and their associated tendency to become commonsensical and intuitive, thereby inhibiting the dissemination or even the articulation of alternative ideas. The associated term hegemon is used to identify the actor, group, class, or state that exercises hegemonic power or that is responsible for the dissemination of hegemonic ideas.
Hispanic or Latino	U.S. citizens or lawfully admitted permanent residents of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish or Portuguese cultures or origins regardless of race.
Inclusion or Inclusivity	Inclusivity is an active process to help all members of an organization feel welcomed, respected, supported, and valued as team members.
LGTBQIA+	An umbrella term that is often used to refer to the Lesbian, Gay, Bisexual, and Transgender community as a whole. 'QIA+' is included to intentionally include and raise awareness of Queer, Intersex, and Asexual communities as well as a myriad of other communities.
Native Hawaiian and Other Pacific Islander	U.S. citizens or permanent residents who have origins in any of the original peoples of Hawaii and other Pacific Islands and who maintain tribal affiliation or community attachment.
Non-Profit Sector	The non-profit element of the economy controlled by private organizations and non-governmental organizations.
Persons of Color (POC)	Also known as “People of Color” which is often the preferred collective term for referring to non-white racial groups. Racial justice advocates have been using the term “people of color” (not to be confused with the pejorative “colored people”) since the late 1970s as an inclusive and unifying frame across different racial groups that are not white, to address racial inequities. While “people of color” can be a politically useful term and describes people with their own attributes (as opposed to what they are not, e.g., “non-white”), it is also important whenever possible to identify people through their own racial and/or ethnic group, as each has its own distinct experience and meaning and may be more appropriate.
Persons with Disability	There are two common ways of looking at what disability is. One way is to see a disability as a medical condition that a person has. From this perspective, disability covers a broad range and degree of conditions, some visible and some not visible. A disability may have been present from birth, caused by an accident, or developed over time. There are physical, mental, cognitive, and learning disabilities, mental disorders, hearing or vision disabilities, epilepsy, drug and alcohol dependencies, environmental sensitivities and other conditions. A newer way of looking at disability is that it is not something a person has. A person with a medical condition is not necessarily prevented (or disabled) from fully taking part in society. If society is designed to be accessible and include everyone, then people with medical conditions often don’t have a

	problem taking part. From this point of view, disability is a problem that occurs when a person's environment is not designed to suit their abilities.
Private Sector	The for-profit part of the national economy that is not under direct government control.
Public Sector	The non-profit part of the economy that is controlled by a form of government.
Some Other Race	A residual category with a write-in box, in addition to the five standard race categories.
Two or More Races	U.S. citizens or permanent residents who chose more than one of the other race categories.
Unconscious bias (or implicit bias)	Social stereotypes about certain groups of people that individuals form outside their own conscious awareness. Everyone holds unconscious beliefs about various social and identity groups, and these biases stem from one's tendency to organize social worlds by categorizing. Unconscious bias is far more prevalent than conscious prejudice and often incompatible with one's conscious values. Certain scenarios can activate unconscious attitudes and beliefs. For example, biases may be more prevalent when multi-tasking or working under time pressure.
White	U.S. citizens or permanent residents who responded "No, not Spanish/Hispanic/Latino" and who reported "White" as their only entry in the race question.

1.3 A Brief Case for Diversity, Equity, and Inclusivity

Any discussion of modern disparities related to race, gender, ability, or class requires a holistic lens to understand the coalescence of events, laws, policies, and behaviors that have resulted in systemic inequities. For some readers, the following paragraphs may be familiar territory briefly detailing in part the process by which disparities, particularly racial disparities, have come to be a regular feature of life in the United States. For others, this information might not be new, but having a lens that connects these independent events together is crucial for understanding how disparities have come to impact society.

After the murder of George Floyd, the United States was forced, once again, as a country to grapple with the reality of the racialized history of the United States. Systemic racism, defined by Kwame Ture, refers to the system and structures that reproduce racial inequities, and is embedded and evidenced across the landscape of the United States.[1] These inequities result in disparate opportunities for people based on race; however, race is not the only subject covered within the scope of Diversity, Equity, and Inclusion.

While the casual observer might see the confluence of events that led to the so-called "Summer of Racial Reckoning" as an isolated incident, it was caused by a long history of racial violence. The history of the economic system of chattel slavery is widely decried as inhumane in the current era; however, the impacts for Black and African American peoples persist to this day. During the post-civil war reconstruction era, Black men were regularly lynched for actual or perceived crimes. The last official

[1] K. Ture & C. V. Hamilton "Black Power the Politics of Liberation" (Random House 1967)

recorded lynching occurred in March 1981 where several members of the KKK beat and killed Michael Donald; however, experts debate whether the murder of James Craig Anderson in 2011 constituted a lynching. While the mob violence of lynching was not called for by the government, the government through its policies weaponized and enforced racial antagonism with an understanding that this type of racial violence would be used to enforce official policies.

The Jim Crow era post reconstruction heralded one of the most extreme racial segregation policies that the world has ever seen. This segregation was state sanctioned but reinforced by the violence described above. African Americans were excluded from many of Roosevelt's New Deal policies, and while African Americans were both drafted and enlisted into WWII, they had no access to the benefits that came with the GI Bill. These two policies represent critical infrastructure that allowed the blossoming of the American middle class as we know it today; however, African Americans were explicitly excluded from these benefits until the 1964 Civil Rights Act. While the Civil Rights Act overturned segregation generally, it did not offer any sort of amelioration for decades of lost economic growth that was kept from African Americans. After the passage of the Civil Rights Act both republican and democratic politicians used dog-whistle politics in order to hide racially motivated policies including Nixon's War on Drugs to Clinton's War on Poverty[2]. Both had dramatic negative impacts on the African American population of the United States. Finally, even when African Americans were able to begin building wealth, banks and lending agencies targeted African Americans with sub-prime loans even when the borrower was able to afford a conventional loan[3]. This was a key cause of the 2008 financial crash which impacted all Americans. This demonstrates the critical need of DEI work because while African Americans were targeted, the entire country suffered because of banking policies that were supported by the federal government.

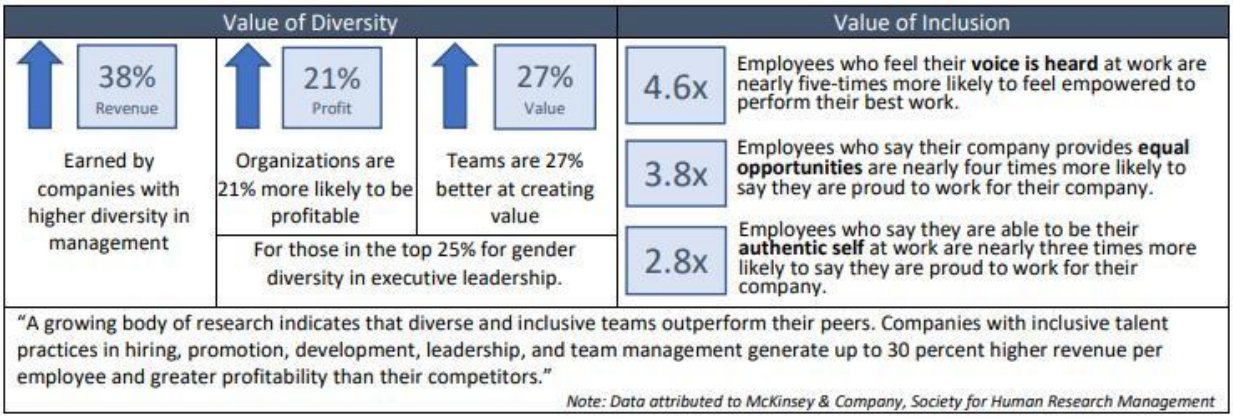
This very brief history of anti-Black policies in the United States may make it seem that DEI is focused around one minority group, but the United States was built on the exploitation of racial minorities. The Chinese Exclusion Act of 1882 was enacted because "In the opinion of the Government of the United States the coming of Chinese laborers to this country endangers the good order of certain localities within the territory." This was only a few years after 15,000 Chinese immigrants had assisted the United States in the construction of the transcontinental railroad where they were paid dramatically less than their White counterparts and were required to provide their own room and board while White workers were provided housing and meals by the railroad. It is a well-known fact that during WWII Japanese Americans were interned in camps across the United States; what is less known is that their property, businesses, and assets were seized and never returned after the end of the war. First Nations, the original residents of the modern United States, faced a genocide the likes of which has never before been seen and which many indigenous activists claim is ongoing. Hispanic Americans are subject to convoluted backlogged immigration policies that allow business owners to take advantage of their immigrant status and allow these workers to be underpaid at the profit of the company. After the events of the September 11 terror attacks on the World Trade Center, Muslim Americans and Middle Eastern people with no legitimate ties to terrorism were targeted with the strategic use of the PATRIOT Act resulting in lost businesses and earnings. The list of crimes committed against minorities that directly impact their financial prospects continues to grow even to this day.

[2] Lopez, Haney I. *Dog Whistle Politics: How Coded Racial Appeals Have Reinvented Racism & Wrecked the Middle Class* Oxford; New York: Oxford University Press, 2014

[3] Rothstein, Richard *The Color of Law* Liveright Publishing Corporation 2017

Inequities are not just exclusive to the realm of race. Experiences around gender identity, national origin, ability, neurotype, and many other lived experiences face different issues depending on identity and presentation. DEI seeks to understand what causes disparities for the historically underrepresented identities within these groups and empower them to have the same opportunities as their social dominant counterparts. Within both the public and private sector, increased diversity and inclusion yields huge dividends. It is important to note that simply having diversity is good but does not inherently guarantee inclusion.

FIGURE 1-1. VALUE OF A DIVERSE ENVIRONMENT



4

The above research provided by McKinsey & Co. demonstrates huge gains in revenue, profit and efficiency within a diverse environment. Qualitatively, organizations which successfully create an inclusive environment result in employees feeling empowered and able to bring their authentic self to work. This leads to increased buy-in and is likely what drives the increased value of diversity. Therefore, inclusion is just as important as diversity to create an equitable environment. Equity is the result of a diverse and inclusive environment and yields huge benefits to both private and public sector operations.

1.4 Peer Review and Best Practices

The following is a compilation of selected peer research prepared by MGT for the city of Oregon City (City). The peers were selected for their similarity to Oregon City in either population, gross domestic product of all industries (GDP), or proximity. The sections that follow are intended to provide information, models, and insights in five similar communities related to how equity is being addressed in other communities. As expected, there is no one size fits all solution. Community priorities, dynamics, resources, and other factors drive efforts undertaken in other communities. However, a significant thread common to all target communities revolved around the following:

- Access and Equity: Determining what steps must be taken short and long term to ensure access and equity in benefits, opportunities, compensation, and policies afforded by the City.

[4] Dixon-Fyle, Sundiatu; Dolan, Kevin; Hunt, Vivian; Prince, Sara *Diversity Wins* McKinsey & Company 2020.

- Evidence-Based Initiatives: What steps must be taken to ensure initiatives and strategies to promote and advance equity are based on best practices and the most accurate picture of inequities that affect the ability to live well and thrive.
- Leadership Commitment/Support: What steps must be taken by key leaders to foster, promote, and sustain diversity, equity, and inclusion consistently and visibly.
- Knowledge and Skills Enhancement: What steps must be taken to ensure mentoring, coaching, training, and other strategies are used to effectively mitigate implicit bias and promote and foster greater understanding of the unique experiences of minorities and other marginalized groups.
- Framework: Effective and impactful solutions framed around the following:
  - Diversity: there must be a commitment to diversity in myriad forms including race, ethnicity, gender identity, sexual orientation, socioeconomic status, language, culture, national origin, religious affiliation, age, (dis)ability status, and political perspective.
  - Equity: there must be a commitment to actively challenge harmful bias and embed equity in policies and practices to ensure equal opportunity for all persons.
  - Inclusion: deliberate and intentional efforts must be taken to ensure an environment and culture where differences are welcomed, different perspectives are respectfully heard, and all community segments feel a sense of belonging and inclusion.

It is against this backdrop that MGT conducted this peer research. For this review, MGT's research focused on communities in the State of Oregon as well as similar communities across the United States. Ultimately, the results of the peer research will be used to help guide areas of inquiry and engagement and help to inform recommendations, practices, and policies for consideration by the City.

1.4.1 Tualatin, OR

The City of Tualatin was a peer selected by Oregon City who began their work in their equity journey in 2017 with Resolution *No 5319-17 Declaring the City of Tualatin an Inclusive City*. The Resolution contains three resolutions as follows:

1. Declaration of the City of Tualatin, an inclusive city
2. Adherence to Oregon Revised Statute 181a.820 prohibiting any law enforcement agency from using resources for the purpose of detecting or apprehending persons whose only violation of the law is that they are persons of foreign citizenship present in the United States in violation of federal immigration laws
3. Consistency with federal and State laws.

Beyond the apparent incompatibility of resolution two which functionally declares Tualatin a so-called "sanctuary city" a city cannot fiat its way into diversity, equity, and inclusion as it attempts to do with resolution one. DEI is a journey that requires investment and works to maximize outcomes. Tualatin has yet to conduct a comprehensive DEI assessment available to the public and has not published a strategic plan that includes DEI goals. The City's Parks & Recreation department has published five goals related to equitable hiring, meaningful engagement of historically marginalized communities, creating safe and welcoming programming, equitable resource allocation, and tracking and reporting metrics related to DEI.

These goals are helpful and align with much of the other work that is being done in the State of Oregon. Overall, the City of Tualatin appears to be at the start line of its DEI journey but does have some best practices that align with the rest of the State.

1.4.2 West Linn, OR

The City of West Linn was another critical peer that Oregon City identified as a peer leading the State in DEI work. West Linn began its DEI journey in April 2020, shortly before the killing of George Floyd. The City sought the assistance of the Kenly Group to consult on DEI issues focused on policy development, employee training, and providing the City with a comprehensive framework to carry the work forward.

In the Kenly Group's final report, there were two deliverables of note. The first was a replication of Deloitte's 2018 maturity model with the added benefit of identifying where on the model the West Linn falls. The four categories are as follows:

1. Compliant with equal EEO or affirmation action goals
2. Program oriented with increasing representation of specific groups
3. Leader-led leveling the playing field for all by addressing systematic cultural barriers
4. Integrated leveraging difference to create business value

The report identified that the City was progressing through phase 2 towards phase 3 at the time of the report. This type of analysis is helpful as a very rough framework to identify the current landscape of a municipality and determine where critical points of influence are necessary to move the needle and advance the organization to the next level.

In addition to identifying the maturity model, the Kenly Group identified seven key recommendations to push the City of West Linn towards the third level of the maturity model. A snapshot of key recommendations is as follows:

1. Strategy & Mission
    - Provide clarity around purpose and implement a citywide DEI charter and strategy with specific goals, objectives, action items, timelines/commitment, responsible parties with accountability and tracking mechanisms.
    - Create an office of DEI that has professional oversight of DEI strategy
2. Organization & Culture
    - Establish a special DEI task force comprised of staff and community volunteers to help understand who has been impacted by past policies, inequities, practices, systems, programs and advance DEI in the City and community.
3. Recruitment, Performance & Promotion
    - Hire a DEI professional to manage the office of DEI
    - Ensure hiring, contracting, policies, and processes are in place for programming, committees, and departments with more equity focus.

4. Community Engagement
    - Develop meaningful partnerships with neighborhood associations/groups and advance DEI externally, in order to meet the needs of and enhance services or provisions to underserved communities
    - Support and encourage the creation of diverse community based advisory boards focused on enhancing DEI and include their feedback in policy and decision making.
5. Finance, Procurement & City Services
    - Allocate budget, time, and resources needed to design, develop and implement DEI strategic citywide initiatives. Initiative should have a clear framework, strategies, policies, activities, and measurable outcomes.
    - Generate a financial dashboard to track where funds are going and who is impacted.
    - Promote the Library as a resource for DEI research, including increasing its black, indigenous, people of color, and foreign language materials and programs.
6. Training, Awareness & Education
    - Provide all elected officials, leaders, staff, boards, committees, volunteers, etc. with basic DEI training so everyone has a stronger self-awareness, understanding of bias, compassion-based practices, and sustainable actions.
    - Require staff to attend DEI customer service-oriented training to ensure service is extended in a respectful manner to residents regardless of individual values, beliefs and knowledge.
7. Communications
    - Provide communications support for visual, hearing, cognitive, speech impairments, and different languages.
    - Establish a citywide DEI communication to provide updates and progress on DEI initiatives
    - Develop a marketing/inclusion plan to underserved populations

The goals identified by the Kenly Group are consistent with many of the goals MGT has identified as being significant in the State of Oregon and across the country with similar peers. The goals are significantly more detailed than those presented here and include a number of other objectives within each goal to quickly and efficiently develop equitable practices across the City. For these reasons, West Linn is a strong peer, and their models are worth further investigation and replication.

1.4.3 Happy Valley, OR

The Happy Valley DEI landing page is one of the most unique this office has reviewed. Although, it leads with fairly standard diversity demographics, the bulk of the page is made up of DEI reading lists broken down by category, including areas of race, gender, social justice, and body positivity, among others. Like many other peers in 2020, Happy Valley issued a four-part resolution condemning racism and mandated the following:

1. Authorizing the creation of a DEI task force to develop a strategic plan to promote change and support inclusion in the community
2. Commitment to review systems, programs, policies, and practices and remove barriers to ensure access to all
3. Through 2020-2021 authorize the necessary funding to hire a consultant team to assist in the development of a DEI strategic plan
4. Affirming that the City will explore ways to partner with local organizations to confront bias

From the information available, Happy Valley created an incredibly detailed strategic plan related to three focus areas:

- Reflecting the diversity of the City,
- Staff culture and training, and
- Accountability to city residents.

Each of these focus areas has several pages of goals that demonstrate ownership of the goal by city staff and the target implementation date. While the goals of this strategic plan are too extensive to fit in this report, some highlights include continuous learning and development for staff to create a common language around DEI, accountability through regular updates and institutionalizing the DEI task force and expanding communication strategies to meet the needs of a diverse community. The strategic plan was voted on and adopted by the Happy Valley city council in October 2021.

1.4.4 Tigard, OR

Tigard, OR is collecting and publishing diversity snapshots and has a dedicated DEI team that the Human Resources director directs. They also have implemented 4 benchmarks as measures of success for the City, including:

1. Building a workforce that is broadly reflective of the community we serve
2. Attracting and retaining a talented workforce skilled at working together with inclusion
3. Create a space for community conversations around diversity, equity, and inclusion to help identify and address barriers within organizational systems
4. Creating processes, policies, plans, practices, programs and services that meet the diverse needs of those we serve

Similar to Happy valley, Tigard also has education on their DEI page, including an ongoing podcast series on creating equitable outcomes in Tigard called *Talking Tigard.* There is a section on "Fearless Female Leaders" in Tigard; however, the list is exclusively of white women. There is also an entire YouTube playlist of educational information related to DEI. Based on this information, the City of Tigard is focused first and foremost on the education of its staff and community. This focus, while appropriate, should be coupled with specific, measurable goals based on data relevant to the City. While some internal equity audit may have been conducted, which led to this decision to focus so heavily on education, there is no publicly available documentation to support this. Nevertheless, the general educational content is very strong, bolsters their DEI practices, and could be something that Oregon City considers replicating.

1.4.5 City of Lake Oswego, OR

The city of Lake Oswego, Oregon initiated its DEI efforts in May 2019, with Lake Oswego passing Resolution 19-31, which established their DEI task force. The task force was responsible for creating a snapshot of the community that included robust community engagement and recommendations based on this research. The task force focused on five key areas:

- Commissions/Boards
- Workforce hiring & retention
- Facilities & Programming
- Community Engagement
- Youth Engagement

The City of Lake Oswego conducted focus groups consisting of 59 total participants for the study. The City also conducted a survey totaling 161 respondents. Based on this mixed qualitative and quantitative data, the DEI task force created a list of recommendations. The recommendations are grouped by the key areas mentioned above and further divided into short, middle, and long-term goals. For example, the Boards and Commission's section had a total of six goals broken down as follows:

- Short Term
    1. Recruit diverse applicants for boards and commissions
- Mid-Range (18-36 Months)
    1. Develop on-boarding process for new board members to include the role and duties of an advisory board. Specify members' role in working with council and staff
    2. Conduct mid-term check-ins with boards and commissions members to gauge levels of engagement
    3. Enhance visibility off boards and commissions at diverse community events
- Long Range (3-5 years)
    1. Develop a leadership academy to inform underrepresented communities about the structure of local government and the role of boards and commissions in the City. Leadership Academy will consist of a year-long cohort of 25 people
    2. Maintain a list of candidates not selected for a board position and encourage re-application during recruitment periods

Lake Oswego is an excellent peer as it is geographically proximal to Oregon City and implements a mixed-methods approach to its investigation. Another exciting aspect of this peer is that they created the task force at the outset. In their context, the study was executed internally by the taskforce. This demonstrates that other municipalities in the Oregon are implementing mixed-methods studies in order to gain the broadest understanding of the issues possible, and also indicates that taskforces are an effective means of managing the process and can potentially morph into a more permanent office.

1.4.6 Clackamas County, OR

Oregon City is located within Clackamas County and has been in contact and provided assistance to the DEI efforts undertaken by Oregon City employees. Clackamas County's equity, diversity and inclusion (EDI) journey started in 2004 when they created Leaders for Equity, Diversity and Inclusion Council (LEDIC). LEDIC, a volunteer advisory to the commission, serves as a liaison between the County and matters concerning EDI. In 2010, they created another council called the Equity, Diversity and Inclusion Council (EDIC), an employee-led council to strengthen the County's efforts to hire, train and retain a diverse workforce. In 2020, Clackamas County established the Equity and Inclusion Office (EIO). EIO's mission is to lead a culture of learning and awareness of equity and inclusion by guiding, supporting and collaborating with employees and residents in order to foster welcoming communities, and create greater connections where all people thrive and belong. Their vision is that the County is a place where people thrive, have a sense of safety, connection, and belonging, so that everyone is honored and celebrated for the richness in diversity they bring. There are a variety of initiatives, programs and resources that Clackamas has for equity, diversity and inclusion (EDI) which includes:

- Racial Equity Support Line: The support line is led and staffed by people with lived experience of racism who offer support to those who are feeling emotional impacts of racist violence, microaggressions, immigration struggles and other cross-cultural issues.
- ERGs: Employee Resource Groups are volunteer-led groups organized around a particular shared interest. They allow employees the chance for workplace development, networking, mentoring and provide a space for personal and professional awareness
- Translation, interpretation, and hearing accommodations: Clackamas County provides accommodations and auxiliary aides
- The Queers and Allies Group (Q&A): Q&A provides education, advocacy and engagement for Clackamas County employees to create awareness and inclusion to empower equitable change in the workplace.
- Clackamas County holds an annual Community Festival to celebrate the County's rich regional culture and heritage.

In November of 2020, Clackamas County, in collaboration with the Coalition of Communities of Color, cities and local community-based organizations are implementing a community informed study into the everyday realities of Clackamas County's communities of color. They started the process by conducting an environmental scan. The environment scan led to 6 recommendations focusing on areas of concern and strategy for racial justice:

- Representation and Leadership
- Education and Training
- BIPOC-Informed policy
- Access and Services
- Multilingual and Multicultural Communications and Engagements
- Community Support and Connections

1.4.7 Washington County, OR

Washington County lies directly east of Portland and is geographically close to Oregon City making it a crucial peer to investigate. Washington County has been invested in DEI work since 2016 when it launched the Coalition of Communities of Color project. This project is designed to create a proactive effort to bring racial justice to Washington County so that every community flourishes and unites people and stakeholders across the County in collective action to advance racial justice and community building. In 2018, this coalition released its first extensive report *Leading with Race: Research Justice in Washington County*. This report details the lived experiences of eight communities of color and ethnic groups in Washington County. It includes data snapshots of four jurisdictions within the County that identify key socioeconomic outcomes for communities of color living in those cities and a call to action that implores the readers to take recommended steps based on the report's findings. Additionally, in 2018 the County Administrative Office hosted a DEI think tank which created six goals along the theme of creating a diverse workforce and procurement processes. Finally, in 2020 Washington County hired a Chief Diversity Officer to launch and run new DEI initiatives across the County.

What Washington County demonstrates is that the implementation of DEI within a county is a process that takes careful time, investment, and planning. What began as a coalition of community groups asking the County to take up this mantle turned into several new initiatives culminating in the retention of a Chief Diversity Officer. Each step in the process required careful strategic planning and resulted in new opportunities that were previously out of the County's reach. As the city of Oregon City begins its DEI journey, it's essential to recognize that DEI is a process of continuous improvement building on the implementation of strategic goals.

1.4.8 State of Oregon

The State of Oregon completed its Diversity, Equity, and Inclusion plan late in September 2021. MGT has found that it is helpful to look at statewide initiatives and goals to get a better understanding of the issues that the State as a whole sees as most pressing. Like most other governments, the State of Oregon leverages the availability of data to demonstrate the need for a DEI plan; however, one thing that sets the State of Oregon apart is that it authentically and transparently addresses historical and modern inequities that it has been a party to. This includes an explicit example of Japanese internment during World War II and statewide mandatory minimum sentencing, which has "played a key role in perpetuating racial disparities, and so government and policy must be a part of the solution – immediately." The State of Oregon advances a vision of racial equity that dismantles institutional and structural racism, builds a more equitable state where everyone has the opportunity to thrive, and ensures an inclusive and welcoming state for all by celebrating the collective diversity of race, ethnicity, culture, color, disability, gender, marital status, and many other explicitly and implicitly protected classes. Oregon's DEI action plan has five key objectives as follows:

- Normalize the concepts of racial justice in the state government enterprise – acknowledge history, prioritize and make urgent efforts to put racial equity at the forefront.
- Organize efforts and build organizational capacity across departments for connected, cohesive, and amplified impacts. Foster both internal and external partnerships.

- Operationalize and embed racial equity into every part of state government putting DEI strategies into practice.
- Guide and direct enterprise-level operationalizing of racial equity and DEI work.
- Inspire expansion of equity by sharing and collaborating to build on what is already happening.

The State of Oregon is striving to achieve these stated goals through ten specific strategies:

1. **Agency-Specific Racial Equity Plans**

   Each agency is responsible for developing an agency-specific racial equity plan incorporating all the strategies of the DEI action plan in order to set goals and initial timelines.

2. **State Diversity, Equity, and Inclusion Infrastructure**

   State diversity, equity, and inclusion infrastructure is critical to the success of the implementation of DEI initiatives within the agency.

3. **Inclusive Communications**

   For maximum transparency and accountability, communicating our work needs to happen during major shifts and occurrences, and on a day-to-day basis. As we work towards equity, we will need to share the progress of our work in compelling clear, accessible, and transparent ways.

4. **Community Engagement**

   Oregonians (the colloquial term used for a resident of Oregon) are engaged when they are meaningfully included in discussions, decision-making, and implementation of the parts of government that affect their lives. In essence, community engagement means sharing power by proactively working with community stakeholders and building meaningful partnerships to inform decision-making.

5. **Disaggregated Data as a Lever for Change**

   As we leverage qualitative and quantitative data, both drive questions and strengthen our efforts to take action. The role of data is to help identify needs and optimal conditions for access to services and opportunities for improvement.

6. **Equitable Budget, Inclusive Budget Process, and Investing in Target Communities**

   As a state government, we must change our budget process based on the racial impact of our services and investments. It is important to acknowledge and address the racial roots of inequity that currently exist whenever making revenue, procurement, and contract decisions. Racial equity in budgeting can also be highly cost-effective if done thoughtfully and with community input.

7. **Contract Equity and Improving State Procurement Processes**

   Work around equity must entail the provision of economic opportunities for all Oregon businesses. State government strategies can be leveraged to address structural barriers of small business development in both the utilization and availability of firms.

8. **Diversifying the Workforce and Creating an Inclusive Workplace**

People of color play a significant role in Oregon's history and culture. Unfortunately, people of color in our State's workforce face higher unemployment rates and lower wages than non-Hispanic white workers. Overall, people oof color have had higher unemployment rates than white workers, with Native Americans experiencing the highest unemployment rates. Because these inequities in pay and employment have been so consistent over decades, it is time to do things differently. Together we can promote public service through intentional and purposeful recruitment, hiring, and retention of culturally and ethnically diverse staff.

9. **No Tolerance for Racism, Hate, and Discrimination**

   In a healthy and safe society, all people and their diverse backgrounds are celebrated. Our state agencies can ensure the safety of all Oregonians by protecting civil rights and taking active measures against harassment, discrimination, racism, xenophobia, stigmatization, violence and hate crimes. Until that is the norm, the role of state agencies must be to set up an institutional power to protect, care for, and serve those who have been subject to intolerance and harmful discrimination, racism, and hatred.

10. **Urgency, Transparency, and Accountability in All Operations**

    For state employees, there is urgency around hiring practices, budgetary processes, contracting, and procurement, just as there is urgency in making sure employees feel safe at work. Simultaneously, we must put in place real accountability and transparency in our equity-driven work. Without these two things, it is all too possible to deprioritize the urgent needs based on budget cycles and limited resources.

The State of Oregon's strategic plan leaves little to be desired. It addresses the hand of the State in perpetuating historical inequities and seeks to rectify those mistakes through a detailed strategic plan. One key takeaway is that the State heavily invests resources to statewide DEI infrastructure. This could be crucial for Oregon City to utilize. Additionally, the detail and actions associated with each of the ten strategies will likely be helpful to emulate in whole or in part.

1.5 Best Practice Summary

In the past two years, MGT has reviewed dozens of requests issued by municipalities seeking to perform an equity audit, equity profile, or DEI assessment designed to provide evidence and guidance to advance equity, racial, and social justice. Virtually all the requests we have examined have been premised on creating a stronger and more inclusive community where every person can thrive in an anti-racist and pro-equity environment. In addition, we have seen that an assessment has been the starting point for shifting away from policies and practices that react to crises toward investments that address root causes. We found that equity profiles and similar types of assessments tend to focus on areas where people of color experience disproportionately worse outcomes related to health, access to housing and good-paying jobs, educational attainment, income, incarceration rates, and transportation.

This peer review demonstrates that across the country various county and city entities are interested in furthering their DEI efforts to better support their employees. While geography differs, best practices across organizations is the use of a mixed-methods study to capture the experiences of city and county staff. This is typically turned into goals which differ by the needs of the organization. MGT's work is closely

aligned with these best practices as our methodology uses a mix of quantitative and qualitative data gathered by Oregon City to best address these challenging issues.

Based on the above research coupled with MGT's extensive experience we have determined that the following practices and strategies tend to be effective and warranted:

- An internal audit to develop goals generally yields positive results and helps employees and management align around DEI.
- Specificity in goals generally requires more investment and accountability but has the benefit of demonstrating a commitment to DEI as well as access to specific impacts.
- Accountability with executive level leadership is needed in several key areas, including operations and services, plans, policies and budgets, workforce and workplace, community partnerships, and internal and external communications and education.
- An internal equity audit should be premised on identifying where barriers towards DEI have the potential to create worse outcomes for specific marginalized demographic groups. Based on MGT's experience key areas within policies and practices include the following:
  - Hiring & Development
  - Pay & Promotion
  - Antidiscrimination
  - Benefits
  - Harassment & Retaliation
  - Good Faith Efforts
- The structure, resources, and authority to plan and execute strategies are essential to long-term success. Happy Valley, the State of Oregon, Lake Oswego have all implemented task forces to address issues of equity and access and are good examples of the structure, resources, and authority that can make a huge difference in an equity audit.
- Continuous community and stakeholder engagement is essential for buy-in, credibility, and community support.

2. Policies Review and Analysis

2.1 Methodology

This section summarizes the steps undertaken to review the Oregon City's Human Resource (HR) policies utilizing a methodology MGT has refined over the course of 200 disparity and equity studies. In examining the routine application of HR policies and procedures, MGT focused on understanding the hiring process, job descriptions, current employment process, non-discrimination policy, sexual harassment policy, violence prevention policy, and relevant local administrative codes. City staff completely cooperated with the acquisition of documents for review. MGT's approach included collecting and reviewing source documents pertinent to the HR policy review. The methodology included the following significant steps:

- Identification of key documents related to HR policies and practices researched through the City's website
- Communication with Patrick Foiles, the City's Human Resources Director, to obtain any additional critical policy and practices pertaining to the City's HR policies
- Detailed review of all documents individually noting key components of DEI for each
- Aggregate review of documents noting key themes related to the development of DEI throughout
- Review of City's Employee Handbook, and other applicable chapters
- Analysis and summarization of data, information, and input gathered throughout the policy review

MGT's methodology included reviewing various source documents and information pertinent to the HR policy review. The majority of time was spent analyzing the Oregon City Municipal Code, Personnel Policy Manual, and Management Handbook, among others. Important source documents and information collected and reviewed are itemized in **Table 2-1**.

TABLE 2-1. DOCUMENTS REVIEWED FOR THE POLICY REVIEW

INDEX	DESCRIPTION
1	Oregon City Municipal Code Chapter 2
2	Personnel Policy Manual
3	Job Descriptions
4	Management Handbook
5	AFSCME Contracts
6	OCPEA Contracts
7	Employee Benefits Webpage
8	Complaints Against City Employees Webpage

2.2 Policy Overview

MGT used a multi-faceted approach to conduct the review and prepare this summary, which included collecting and reviewing relevant source documents as articulated above. The eight different documents cover programs and policies designed to create an equitable work environment across the City and diversify the workforce. In addition, as part of the equity assessment, MGT reviewed requirements for the policies and procedures highlighted in the following section. Through this review, MGT sought to determine if policies or conditions limit the pool of candidates or create built-in barriers that adversely impact diversity, equity, and inclusion.

Table 2-2 is a copy of the rubric used to analyze the policy documents received by MGT. In general, the policies distributed to MGT demonstrate a commitment to establishing an equitable workplace; however, the City can improve in some areas to better reflect the diversity of the community as a whole. For example, Oregon City uses some gendered language throughout the records received. The use of specific gendered pronouns such as she/her/hers or he/him/his is not considered a best practice. Generally, best practices dictate that organizations seeking to increase diversity and inclusion should consider using nongendered terms wherever and whenever possible. There are two reasons for this distinction. First, using a binary gender (ie. he/she or hers/his) entrenches normative binary genders, alienating a large portion of the LGBTQIA+ community. Second, gendered pronouns can cause the perception of excluding women and genderqueer individuals as male-exclusive or male-leading language is usually the default.

The City has also done an excellent job laying out the reporting standards for sexual harassment, non-discrimination, and violence prevention. Oregon City has one of the most comprehensive antiharassment policies MGT has had the privilege of reviewing and is an exemplar that MGT would use to demonstrate to the City's peers what is possible in this realm. The definitions of harassment and retaliation are clear, there are enumerated examples of prohibited behavior, and there is clear anti-harassment training. These all lend themselves to incredibly strong anti-harassment and anti-retaliation policies.

TABLE 2-2. SCORING RUBRIC

	Document Rubric	Score
Hiring & Development	Bias removed from job description	0
	Conduct blind resume screening	3.5
	Opportunities exist for contractors and temps to become full-time employees	0
Pay & Promotion Transparency	Transparent communication around seniority, pay scale, and promotion requirements	3
	Performance review & assessments are standardized to ensure uniform evaluation style.	3
	Clear communication of low, median, and high pay ranges for particular roles	1.5
Anti-Discrimination	Hiring practices explicitly ensures anti-discrimination and resources for LGBTQIA+ individuals	4

	Hiring practices explicitly ensure anti-discrimination and resources for veterans	0
	Hiring practices explicitly ensure anti-discrimination and resources for disabled individuals (See Job Accommodation Network for more details)	0
	Publish compensation levels and pay bands	0
Benefits	Provide paid parental leave and leave for caretaking	0
	Provide childcare and eldercare coverage or subsidies	5.5
	Healthcare includes options that cover women-specific needs (ie. gynecology, maternal health, reproductive health, domestic violence treatment)	0
Harassment & Retaliation	"Sexual harassment" clearly defined within policy	8
	Sexual harassment whistleblower/antiretaliation protections established and defined	9
	Transparent sexual harassment reporting process which incorporates employee feedback.	9
	Seperative remedies offered to alleged victims of sexual harassment during investigation period	7
	HR programs and policies show many attempts to make a good faith effort to be free of confusing language and jargon.	5.5
Good Faith Efforts	Wherever possible, policies and procedures use gender neutral language	8
	Program or policy proactively helps facilitate professional and/or career development.	7.5
	Average Score for the City	**3.73**

2.3 SWOT Analysis of Documents

The rubric identified in **Table 2-1** is divided into the six sections and represents areas where key DEI barriers appear in both the private and public sectors.

- **Hiring & Development:** Policies related to hiring, onboarding, and continued professional development.
- **Pay & Promotional Transparency:** Policies and practices related to compensation and promotion requirements and transparency.

- **Anti-Discrimination:** Policies and procedures designed to decrease and eliminate discrimination against all people regardless of race, gender, ethnicity, ability, age, or other demographic indicators.
- **Benefits:** Policies and procedures focused primarily on options around leave, paid time off (PTO), and various medical benefits pertinent to the work of DEI.
- **Harassment & Retaliation:** Review of the policies and procedures closely related to the prohibition of harassment and related antiretaliation policies.
- **Good Faith Efforts:** Other efforts that demonstrate good faith when applying the principles of DEI focused around inclusive language across the policies and procedures.

A SWOT analysis is a tool used to determine the Strengths, Weaknesses, Opportunities, and Threats to programs or policies. Strengths and Weaknesses are self-explanatory and, in this context, refer to elements of documents that actively increase DEI across the City. Opportunities are how weaknesses identified may be shored up. Finally, threats are significant internal or external issues or barriers that could adversely impact increasing and embedding DEI in the City's practices.

Hiring and Development

Strengths

Hiring and development is an area where Oregon City can make significant improvements in relation to DEI best practices. When examining hiring and development policies, MGT analyzes job descriptions, hiring processes, and professional development opportunities. Based on our review, most of these policies are nascent or completely absent. That being said, a key strength that MGT identified with regard to the job descriptions is that bias appears to be largely eliminated. There are office roles that do not require an undergraduate degree, which is crucial in ensuring economic mobility within the organization. It appears the City acknowledges this by offering roles that do not require an undergraduate degree or a specific degree.

Weaknesses

MGT identified several weaknesses in the City's hiring and development policies. First, the job descriptions do not contain specific pay ranges. While it is noted that there are 'pay grades' associated with most job descriptions, these require a potential applicant to look up the AFSCME contract, identify the pay schedule, and determine what grade they would be compensated at. These additional steps also require some understanding of collective bargaining since the pay schedule is hard to find in the AFSCME contract. Additionally, MGT did not find any professional development investments within the City's Personnel Policy Manual. Professional development typically takes many forms, but most clients MGT has worked with offer a set amount for courses annually coupled with specific educational benefits. For example, many of MGT's clients offer, around $5,250 per year for tuition assistance with an additional $500 specifically for books. This type of professional development allows employees to continue to grow and mature in their careers which allows for increased economic mobility. A third weakness that MGT identified is that the Personnel Policy Manual lays out the process for hiring temporary workers, but the policy explicitly states that temporary work is meant to stay temporary and not fill or replace pre-existing full-time positions. While this policy is helpful for protecting the roles of full-time employees, there is no

policy that indicates a path to full-time employment for temps. Limiting the transition of temporary employees to full-time employees can harm DEI goals as it creates two separate hierarchical classes of employees which could be treated differently based on their work. Temp positions are also excellent paths for those returning to the workforce such as stay at home parents or individuals returning from injury or illness. Again, incorporating a path to full-time employment for temporary workers could improve the economic mobility of employees, and avoid DEI issues around class and opportunity. Finally, it appears as though there is limited standardization within the hiring process for Oregon City. Hiring and advancement are two areas that are most impacted by unconscious bias, which means that the standardization of hiring practices can ensure that all candidates are given an equitable chance at the role.

Opportunities

There are a number of opportunities to improve upon the weaknesses MGT identified. The first is to standardize hiring procedures. Currently there is a basic framework for hiring new employees, but there is no policy that requires standardization of interview questions. A lack of standardization can quickly turn the interview process into a popularity contest rife with unconscious bias. Requiring interviewers to submit a list of questions for the role prior to interviews would be a quick way to address this without creating exorbitant amounts of work for employees involved. Along the same lines, creating a standardized path to full-time employment for interns would be another way to potentially increase diversity within City employment. The City should also consider implementing a professional development program either partnering with an organization that offers relevant certifications or creating a tuition reimbursement program so employees can take certification and continuing education courses.

Threats

Hiring and development is an area that is crucial to ensuring DEI within an organization. The lack of standardization within the hiring process could be seen as a threat to DEI as it creates a large risk of unconscious bias within the hiring process. This has a direct impact on the diversity of City employment and could be dramatically limiting equity with potential new employees.

Pay and Promotion Transparency

Strengths

As mentioned above, there is a published salary schedule for the City of Oregon City which is crucial for pay equity and pay transparency. The salary schedule is published within the AFSCME contract and includes the schedule and associated cost of living adjustments (COLAs) for the 2019-2020, 2020-2021, and 2021-2022 fiscal years. That being said, there is no reference made to the salary schedule under the City's Policy 115 that governs the salary program administration.

Weaknesses

Currently the City has limited policies governing the standardization of promotion requirements and performance reviews. When administering performance reviews, departments are 'encouraged to use the City's standard evaluation form' but are not held accountable in any meaningful way. Performance reviews are a key area where unconscious bias can negatively impact an employee's experience with an organization. Standardization of performance review standards is a core component of eliminating this

type of bias. Therefore, while there is an attempt to standardize, which is a strength, much more could be done in this regard.

As mentioned above, there is no reference or guidance in the policy documents to guide employees on how to locate, read, and understand the salary schedule. Currently under the City's Policy 115, it is established that the compensation plan is maintained by the City Manager's office; however, there is nothing noted indicating that to find the salary schedule an individual will have to consult the AFSCME contract.

The biggest identified weakness as it relates to pay and promotion transparency is the lack of standardization of the supervisorial appraisal under the City of Oregon Personal Policy Manual Policy 610. As expressed above, this lack of standardization can introduce the unconscious bias of supervisors into the performance review process. A recent article in the Harvard Business Review identified four key patterns of bias that can be introduced into the performance review process[5]. The article, based on a case study, suggests that beyond racial and gender stereotypes there are three key ways bias can be introduced to the performance review process:

1. Groups who supervisors may unconsciously see as less competent are asked to prove themselves repeatedly. Mistakes that members of these 'prove it again' groups make are typically remembered much longer and weighed heavier than successes causing negative impact to the employee at the time of the performance review.
2. A narrower range of acceptable behavior is tolerated from women and people of color than white male counterparts. During performance evaluations women or POC people might be labeled as 'bossy' or 'aggressive' for certain behaviors; whereas the exact same behaviors from men and white people would be labeled as 'authoritative' or 'leadership.'
3. Nearly 20% of white women were assumed to no longer wish to make partner with the case study firm after having children. This type of bias around what a woman's priorities are pre and post birth can also introduce unconscious bias into the performance evaluation process.

Opportunities

There are two opportunities that would address the weaknesses identified under pay and promotion transparency. First, MGT recommends publishing a document that contains the salary schedule apart from any collective bargaining agreement. This makes the pay schedule significantly more accessible and transparent to current and potential employees. MGT also recommends standardizing the performance review process in order to minimize unconscious bias. For example, it is best practice for organizations to require managers, or whoever is conducting performance reviews, to create and submit metrics for the roles in question at least one month prior to the start of performance reviews. HR is then responsible for ensuring that the metrics measured correlate with the job description and expectations of any defined career laddering for the role that is being reviewed.

[5] Williams, Joan C.; Loyd, Denise L.; Boginsky, Mikayla, Armas-Edwards, Frances *How One Company Worked to Root Out bias from Performance Reviews* Harvard Business Review April 2021.

Threats

Standardization of performance reviews is critical to ensuring the elimination of unconscious bias in the review process. A reason that many organizations can be diverse at the bottom and non-diverse in leadership is because organizations will often focus their DEI efforts exclusively on recruitment, but less so on employee retention efforts like performance evaluation. This can result in organizations with diverse employees but non-diverse leadership which makes this a potential threat to DEI at Oregon City.

Antidiscrimination

Strengths

When looking at antidiscrimination policies, MGT not only looks at the existence and quality of the policies on record, but also any support systems like employee resource groups, trainings, and practices such as the establishment of a DEI committee designed to support historically marginalized peoples. The City has extensive standards for anti-discrimination by indicating that discrimination is not allowed at the City and pairs it with distinct examples of prohibited behavior. Additionally, within the scope of disability accommodations, there are enumerated examples of what constitutes 'reasonable' accommodation. This is important as the "reasonableness" standard is largely left up to employers.

Weaknesses

One key aspect of DEI initiatives is ensuring the inclusion and anti-discrimination of LGBTQIA+ individuals, disabled individuals, and veterans. Currently, based on the information provided to MGT, there is an anti-nepotism policy that is strong. However, there are no support networks or reporting standards to ensure anti-discrimination of individuals who belong to these groups, which could limit the inclusion of these individuals.

Opportunities

The City should consider implementing protections for LGTBTQIA+ people, including a section indicating non-discrimination against LGBTQIA+ individuals and a section asserting the validity and commitment to respecting chosen pronouns of nonbinary and trans individuals. Along these lines, the City should also consider creating and maintaining employee resource groups (ERGs) to increase inclusive programming in the City. ERGs should have a combination of various identities along with a larger intersectional discussion group that is made up of multiple identities represented by other ERGs.

Threats

While there are no active threats to DEI with the anti-discrimination policies that exist, there is a significant lack of anti-discrimination support and discrimination reporting structure.

Benefits

Strengths

The biggest strength that MGT has identified within the benefits offered to City employees is the existence of gender affirming healthcare through the City's ACA compliant health plan. ACA compliant plans are

required to include healthcare for gender affirming care. This can be leveraged as a tool to recruit gender nonconforming people.

Weaknesses

Based on the documents received by MGT, the City does not offer paid parental leave for caretaking. The current system offers Oregon Family Leave Act (OFLA) and the Federal Family Medical Leave Act (FMLA). Neither of these benefits include a paid provision for parental leave. The City is currently evaluating the paid leave program under development by the state of Oregon that will start in 2023. According to a 2017 report by New America, a highly respected policy think tank, mothers returning to work full time before 12 weeks is associated with their child experiencing developmental setbacks. To receive paid time off under OFLA or FMLA, an employee would need to accrue a minimum of 12 weeks time-off which might not even be possible depending on their specific rate of accrual depending on their tenure with the City. This means that parents are left with the choice to either forgo some or all of their income during their parental leave or return to work early and risk developmental impacts to their children. If parents choose to deplete their accrued sick time to take leave, they must assume that the sick leave will accrue fast enough to allow them to care for any sickness that the new child will experience, doctor appointments, or other events that require the parent to take time away from work. According to a 2021 report by the Bipartisan Policy Center, paid leave increased the likelihood of female employment one year after childbirth by 23%. Similarly, the same report found that women who take paid family leave after giving birth are 40% more likely to return to work.[6] Another study conducted by the Federal Reserve on New Jersey's Family Leave Insurance (FLI) plan found that increased payments through the FLI program were directly correlated with a smaller wage gap in the observed county[7].

In a similar vein, the City does not offer childcare/eldercare subsidies for parents. According to the Center for American Progress (CAP), families with children under the age of 4 spend 10% of their monthly income on childcare. For single parents, this number climbs to 15%.[8] It is noted that Oregon City does have a pre-tax FSA program which caps out at $5,000 which can help support childcare, but only covers a small portion of expected childcare expenses. According to the above referenced CAP report, on average American families spend $250 per week on childcare which totals approximately $13,000 annually representing a gap of approximately $8,000. This has the potential to disproportionately impact the most vulnerable people and could be remedied by additional employer intervention. This could take many forms including a matching program or onsite daycare for employees.

Finally, there is a key policy missing from the documentation received by MGT. There is no policy in the manual governing lactation breaks for new birthing parents. This is a key benefit that is required by the Fair Labor Standards Act requiring an employer to provide "(1) a reasonable break time for an employee to express breast milk for her nursing child for 1 year after the child's birth each time such employee has need to express the milk; and (2) a place, other than a bathroom, that is shielded from view and free from intrusion from coworkers and the public, which may be used by an employee to express breast milk." It is noted that Oregon City does offer this accommodation; however, it has not been codified into policy.

[6] Gitis, Ben *Paid Family Leave Can Help Close the Gender Pay Gap* Bipartisan Policy Center Mar. 24, 2021
[7] Tito, Maria *Maternity Leave and the Gender Wage Gap: An Analysis of New Jersey Family Leave Insurance* Board of Governors of the Federal Reserve System August 17, 2016.
[8] Malik, Rasheed *Working Families Are Spending Big Money on Child Care* June 20,2019

While Oregon City does offer a number of key benefits for parents, this lack of federally mandated policy is what drove down the score of the item in the **Scoring Rubric**.

Opportunities

Based on our review there are a few key opportunities that the City could act on. First, the City could leverage the ACA benefits as a marketing tool to potential candidates to increase the diversity of gender nonconforming and trans people. The City could also consider investing more into its employees through expanding parental leave and childcare options.

Threats

While there are no significant internal threats to equity, the implementation of a paid parental leave program would directly contribute to closing the gender wage gap and have positive benefits on families and children of City employees.

Harassment & Retaliation

Strengths

The City has one of the strongest antiharassment and antiretaliation policies that MGT has had the privilege to review. Harassment is clearly defined in the policy manual and is fairly expansive including definitions coupled with practical examples that clearly demonstrate behavioral norms. In addition, Oregon City has a very detailed definition of antiretaliation that also includes examples of retaliation including 'shunning' which has been prohibited by case law. Further, there is a clear, concise description of the harassment and reporting process in the anti-harassment training presentation. It also offers an alternative path for individuals to report harassment or discrimination in the unlikely instance that complaints arise against the person(s) that is supposed to investigate complaints. MGT also notes that while there are no separation remedies for the alleged perpetrator and victim, there is a requirement to follow up with victims of workplace harassment every 3 months. This continued investment into the victim of harassment is crucial to ensure that the employee still feels welcome and supported even beyond the investigative process. This combination of clear examples for harassment and anti-retaliation coupled with effective training establishes one of the strongest policies that MGT has seen and could be considered a national exemplar of effective concise policymaking.

Weaknesses

The only weakness MGT identified within the antiharassment and anti-retaliation policies is a lack of remedy to ensure minimal contact between the alleged perpetrator and victim during the time of the investigation. This type of provision is crucial to ensuring the physical and mental safety of the alleged victim during the reporting process and crucial to avoid retaliation or intimidation due to the report. Additionally, while there are antiharassment trainings that were presented to MGT for review, it is unclear how often these trainings are administered. As a best practice, antiharassment training should occur at least once a year to ensure new staff are up-to-speed and existing staff benefit from a refresher.

Opportunities

The primary opportunity that would have the highest impact for the City would be to establish a policy that separates and minimizes contact between the reporting individual and the alleged perpetrator of harassment and retaliation. The benefit is that the employee knows that their allegations are being taken seriously, and if there is substance to the accusation, this type of provision would help ameliorate negative impacts of the victim's experience from the outset by minimizing contact with the perpetrator.

Threats

There are no significant threats to the harassment and retaliation policies as they exist; however, the lack of a separation policy means that retaliation could still be a significant concern during the investigation process.

Good Faith Efforts

Strengths

MGT's evaluation of good faith efforts involve ensuring that the programs and policies are written for the common person and are free of both legal and human capital jargon. MGT also ensures that the policies that are used contain gender-neutral language. In our review we found that the majority of documents we received were not overly technical and were reasonably easy to understand for the common person. However, many organizations also include a glossary with their policy manuals which Oregon City appears to be lacking.

Weaknesses

The biggest weakness to these good faith efforts is the consistent use of "his/her" language throughout the policy manual. The use of "his/her" language is generally considered archaic by DEI practitioners as it further reinforces the concept of gender as a binary as opposed to a spectrum. Psychologists, sociologists, and medical professionals in the last years have all agreed that gender is a social construct and is better represented as a spectrum rather than a male/female binary. Therefore, it is important to use gender neutral language in all policies otherwise the documentation is not inclusive for queer/questioning, trans, intersex, and all individuals who do not fall neatly into a gender binary.

Opportunities

To create a more inclusive workplace, the City should consider revising its policy manual to reflect gender neutral pronouns. This will elevate the level of inclusivity reflected within the City's policies and demonstrates a more robust understanding of modern gender politics. Currently there are at least 83 uses of the phrase "his/her" in the policy manual these can all be replaced with the pronoun "their." Finally, a glossary or definitions section before each policy section would be helpful in elevating the good faith efforts to ensure that all employees fully understand the policies that set the basis for how the City as an employer operates.

Threats

There are no significant threats to DEI within the policies as they exist.

2.4 Policy Analysis Summary and Suggestions

2.4.1 Rubric Results

The City scored an average of 3.73 out of 9 which is actually above the average that MGT has come to expect for cities and counties generally. While this high score demonstrates effective initiation of incorporation of DEI concepts into the DNA of the organization, there are still some weaknesses and threats that the City can address through the following suggestions.

- **Standardize hiring procedures and questions**

Codification of a blind resume screening policy would help further Equity within the City. Blind resume screening eliminates the name and other identifiable characteristics when selecting a candidate to help remove bias from the process. Many organizations use an Applicant Tracking Systems (ATS) to help in this work. An ATS does not eliminate bias with recruiting, but it can help lessen it when strategically implemented.

- **Create path to full-time employment for interns**

According to the policies received the City currently does not have policies that offer a path to full-time employment for temporary employees or interns. Codifying a path to full-time employment creates additional economic mobility for employees filling these roles.

- **Standardize performance review process**

Standardization of the performance review process is a best practice as it can help eliminate bias during performance reviews. Individuals working under the same or similar job descriptions should be evaluated along the same metrics. To this end, MGT recommends codifying a standardization of these reviews. This can take a number of different forms, but the simplest would be to require managers to submit their standards to HR a month prior to the scheduled performance reviews. The HR personnel would be responsible for ensuring that the standards align with the job duties enumerated in the job description. This simple change could help minimize bias during performance reviews and ensure that all individuals are evaluated on the same standards.

The City of Oregon City already does some work delegating performance reviews to the individual departments, but there doesn't seem to be a requirement to actually use this template. The City should consider implementing this template as standard practice for performance reviews. Further these requirements should also be delegated in a manner that allows departments to create and maintain their own standards while maintaining oversight by HR. This would look like supervisors submitting the reporting standards a month prior to the execution of performance reviews if done in a block, or at least once annually if Oregon City does rolling reviews.

- **Consider expanding antidiscrimination to include the affirmation of preferred pronouns**

MGT recommends expanding the antidiscrimination section to specifically include the affirmation of preferred pronoun usage at work. The policy should encourage, but not require, employees to include preferred pronouns in email signatures and nameplates in video conferences. The section should also

detail that intentionally using the incorrect pronouns would be a violation of policy and could be met with discipline. An example policy is provided below:

> **Pronoun Usage:**
>
> The City of Oregon City is committed to fostering a safe and supportive culture for all employees. To that end, we encourage you to include your personal pronouns in your email signature. Doing so contributes to creating a safe space for your colleagues to share their pronouns and ensure that we can communicate together respectfully. Please know that this policy is entirely optional; anyone who does not wish to share their pronouns is not required to do so.
>
> **Prohibited Behavior:**
>
> Definitions:
>
> - **Misgender –** Referring to someone -especially a transgender person- using a word, especially a pronoun or form of address, that does not correctly reflect the gender with which they identify.
> - **Deadnaming –** calling a transgender person by their birth name when they have changed their name as part of their gender transition
> - **Outing –** The public disclosure of the covert sexual orientation or gender identity of a person
>
> The City of Oregon City does not tolerate 'misgendering,' 'deadnaming,' 'outing', or any other action that could cause harm to members of the LGBTQIA+ community. This includes but is not limited to knowingly and intentionally using the incorrect pronoun for an individual, intentionally or maliciously using a person's pre-transition name, and the use of gender and orientation-based slurs.

❖ **Specific resources for minority groups**

MGT recommend working to create various support groups for minorities represented within the employees of Oregon City. Employee resource groups are best governed and supported by an executive body that regularly takes recommendations on equity issues identified by the ERG. ERGs should operate by identifying specific goals and should be supported by management in the realization of those goals.

❖ **Create paid parental leave program**

MGT recommends expanding benefits to include paid time off for the birth of new children or for the adoption of new children for families. Tying this benefit to a combination of FMLA and compensated time off is insufficient as this eliminates the employees time-off and operates under the assumption that recovery from birth is the only demand on the time of new parents.

❖ **Establish separative anti-retaliation protections**

MGT recommends expanding the harassment and retaliation policies to include specific situations where the claimant is separated from the alleged perpetrator if they work in close proximity. This would help ensure that if there is harassment, the claimant does not need to work closely with their abuser, and also decreases the likelihood of retaliation or intimidation.

- **Eliminate gendered language**

  There was some gendered language used throughout the documentation reviewed. MGT would recommend converting any gendered language such as he/her

The City has demonstrated a commitment to the principles of DEI within the HR documentation identified for this review. While the City has clearly incorporated principles of DEI within the documentation provided there are some overarching concerns that should be addressed and may be barriers to the City's DEI goals.

Systemic inequality or institutional inequality refers to the propagation of facially race neutral policies which end up uniquely targeting specific - always minority - populations. This systemic inequality is often propagated by existing institutional policies from local governments to the national level. One key factor to any DEI review is to ensure that any systemic inequalities are identified and addressed in a manner that not only ceases the propagation of inequality, but also repairs the damage done to communities.

3. Oregon City Staff Qualitative Analysis and Feedback

3.1 Methodology

MGT engaged employees primarily through an employee survey and two focus group sessions. MGT conducted a survey of the employee workforce to better understand employees' perceptions of diversity, equity, and inclusion within the City, and how the City is doing in regard to recruiting a diverse workforce. The employee survey was distributed via email and was open for two weeks. The survey consisted of ten topics via Likert statements and had five open ended questions. MGT collected some general demographic information in order to identify patterns within race, ethnicity, gender or other employee groups. The Likert statements were grouped into the following categories:

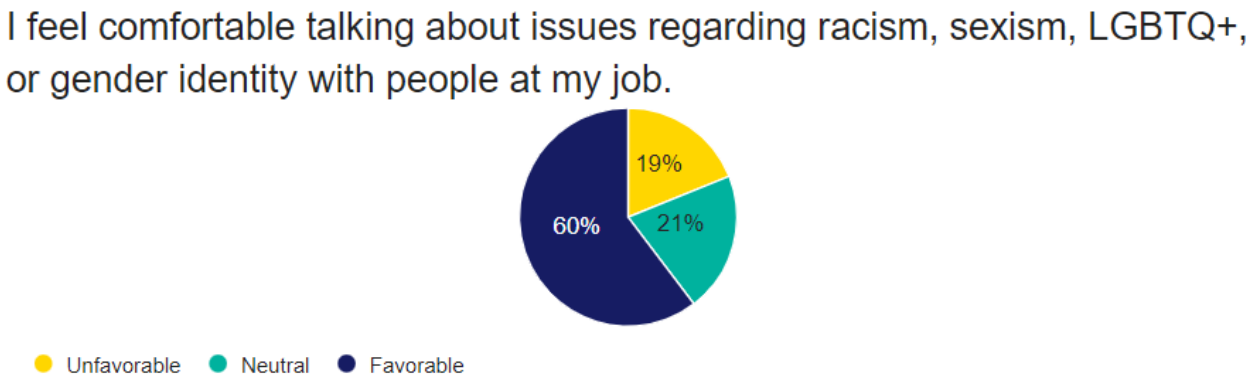
- DEI Readiness
- Diversity
- Inclusion and Belonging
- Equity and Access
- Personal Experiences
- Policies and Procedures
- Hiring and Recruitment
- Career Development
- Your Immediate Supervisor
- DEI Training

3.2 Employee Survey Results

There were 115 employees of the City that participated in the survey, but not every person responded to every question. This is a statistically representative sample at a 90% confidence level with a 6% margin of error. This is a population that volunteered to participate and likely may have stronger opinions on DEI within the City, but it is important to note that this activity coupled with focus groups provides a strong, valid sense of employee opinions on the current state of DEI within the City. When reading the breakouts by demographic groups, it is also critical that readers understand that each individual can identify as many different and varying identities. For example, an employee could be black, but also male, gay and disabled. To maintain anonymity of the respondents, MGT did not collect intersectional demographics.

The figure below paints the picture of the overall workforce's perceptions on the level of diversity, equity and inclusion readiness within the City. Over half of participants answered favorably to the statement of feeling comfortable discussing DEI with colleagues in the City. The City should continue to create more space for employees to engage in meaningful conversations.

FIGURE 3-1. OREGON CITY WORKFORCE DEI SURVEY
DEI READINESS LIKERT STATEMENT

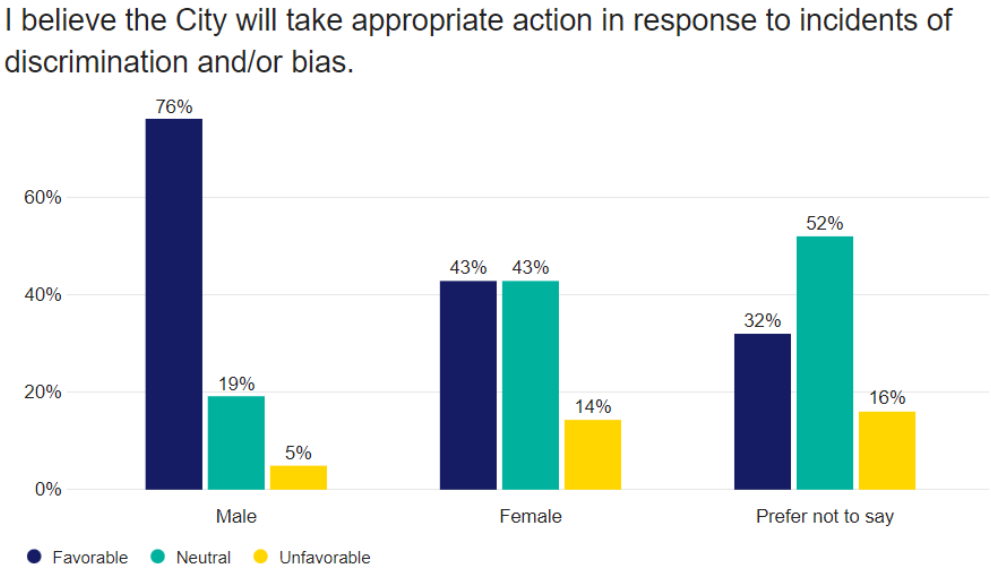


Source: MGT Consulting, DEI Workforce Survey 2022.

3.2.1 Employee Survey Results by Gender

When comparing results in the sections focused on hiring and recruitment, policies and procedures, and career development by gender, many male responses tended to be much more favorable than the female or prefer not to say groups. For example, **Figure 3-2** shows that males are more trusting of the City's action in response to incidents of discrimination and/or bias.

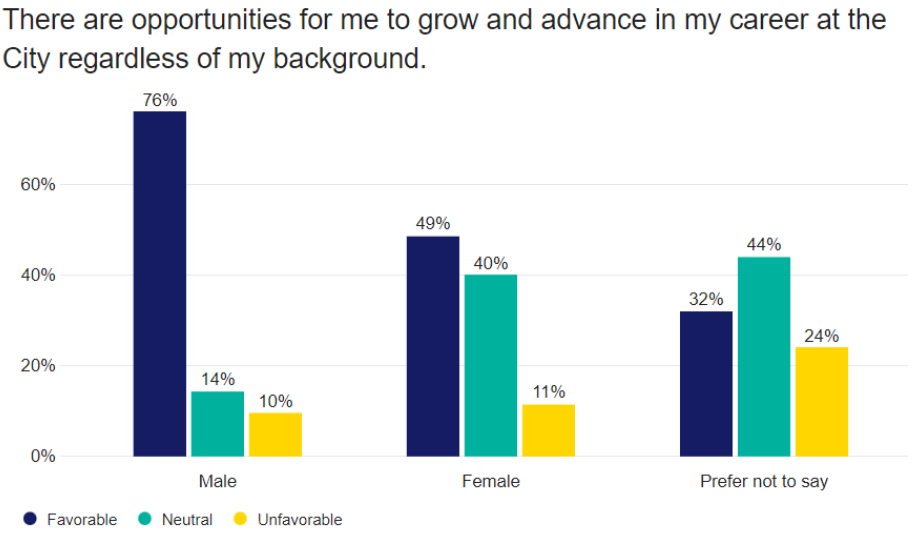
FIGURE 3-2. OREGON CITY WORKFORCE DEI SURVEY
APPROPRIATE ACTION IN RESPONSE LIKERT STATEMENT



Source: MGT Consulting, DEI Workforce Survey 2022.

Again, this same response pattern of males having a more favorable experience is seen in the example below regarding employee experiences regarding career advancement.

FIGURE 3-3. OREGON CITY WORKFORCE DEI SURVEY
OPPORTUNITIES TO ADVANCE CAREER LIKERT STATEMENT

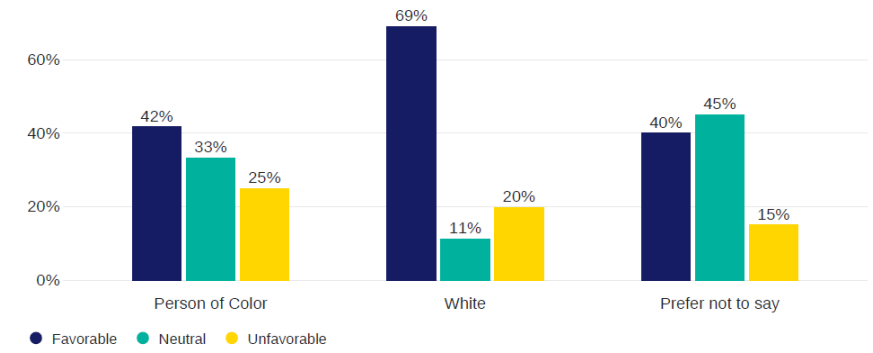


Source: MGT Consulting, DEI Workforce Survey 2022.

3.2.2 Employee Survey Results by Race/Ethnicity

The difference between white and persons of color employees' comfort, or lack of comfort, is evident in the chart shown in **Figure 3-4**.

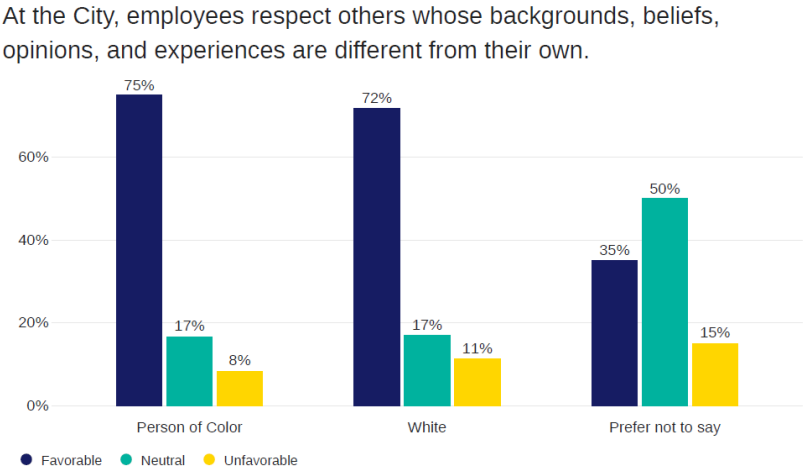
FIGURE 3-4. OREGON CITY WORKFORCE DEI SURVEY
COMFORTABLE TALKING ABOUT ISSUES LIKERT STATEMENT BY RACE/ETHNICITY



Source: MGT Consulting, DEI Workforce Survey 2022.

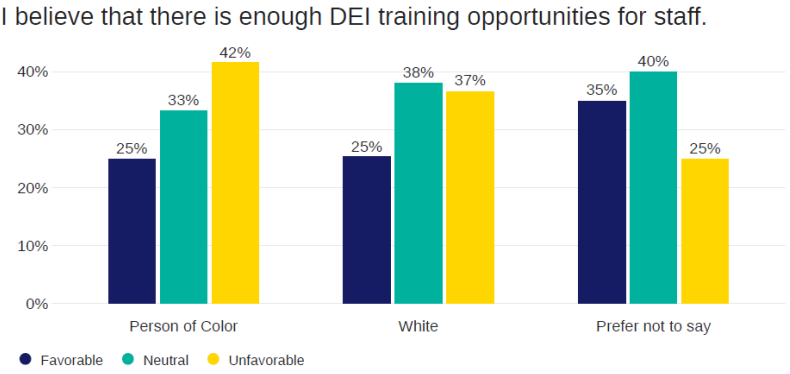
It appears that the lack of comfort is not due to respect for other employees (**Figure 3-5**) but likely a lack of training and knowledge related to DEI topics that has led to discomfort for people of color discussing DEI topics in the workplace (**Figure 3-6).**

FIGURE 3-5. OREGON CITY WORKFORCE DEI SURVEY
COMFORTABLE TALKING ABOUT ISSUES LIKERT STATEMENT BY RACE/ETHNICITY



Source: MGT Consulting, DEI Workforce Survey 2022.

FIGURE 3-6. OREGON CITY WORKFORCE DEI SURVEY
TRAINING OPPORTUNITIES LIKERT STATEMENT BY RACE/ETHNICITY

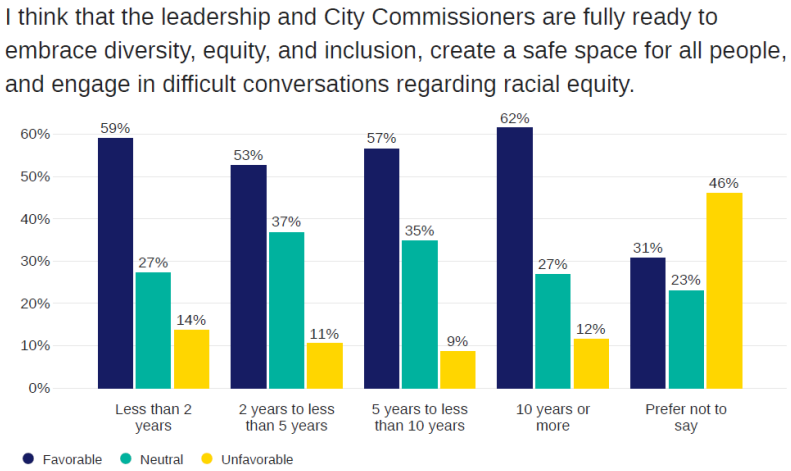


Source: MGT Consulting, DEI Workforce Survey 2022.

3.2.3 Employee Survey Results by Tenure

In general, when looking at the survey responses by tenure, most groups tended to have similar patterns, where all groups that identified with a certain length of time at the City were within a few percentage points of one another but those that chose not to identify how long they had been with the City did not follow that pattern. An example of this response pattern is seen in **Figure 3-7**.

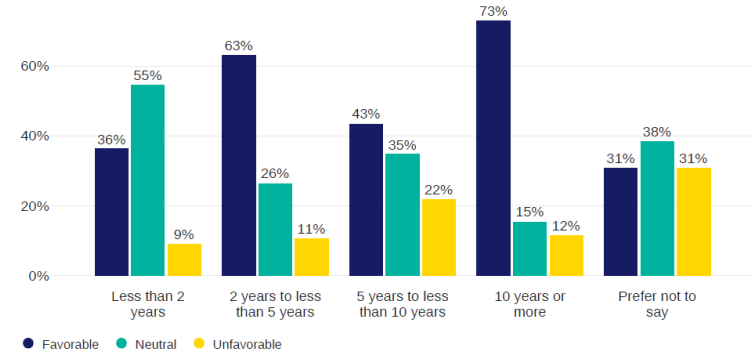
FIGURE 3-7. OREGON CITY WORKFORCE DEI SURVEY
LEADERSHIP'S DEI READINESS LIKERT STATEMENT BY TENURE



Source: MGT Consulting, DEI Workforce Survey 2022.

Figure 3-8 shows one set of responses stood out in how varied responses were through different tenure lengths and displays an interesting difference in experiences from longer tenured employees to the more recent hires. MGT's experience has shown that longer tenured employees tend to answer less favorably to this statement, which can be attributed to the fact a longer tenured employee will have had more potential to have had a negative experience with an organization.

FIGURE 3-8. OREGON CITY WORKFORCE DEI SURVEY
EMPLOYEE EXPERIENCE LIKERT STATEMENT BY TENURE



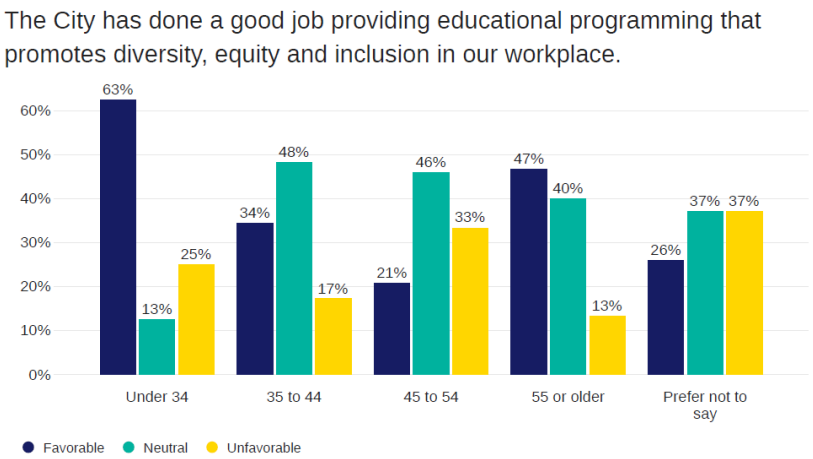
Source: MGT Consulting, DEI Workforce Survey 2022.

3.2.4 Employee Survey Results by Age

The response patterns by age group follow a similar pattern in the tenure at the City. It is again the 'prefer not to identify' group that has much more varied responses than the other response groups. The

statements related to training availability and participation were largely varied by age group but had some of the most neutral response patterns.

FIGURE 3-9. OREGON CITY WORKFORCE DEI SURVEY
DEI PROGRAMMING LIKERT STATEMENT BY TENURE



Source: MGT Consulting, DEI Workforce Survey 2022.

3.3 Employee Survey Open Ended Survey Responses

The analysis tool that MGT used to understand the employee DEI experiences within the City contained a total of five open-ended questions, meaning that employee respondents were asked to give written responses to specific questions related to DEI. These open-ended questions are listed as follows:

- What 1-2 things should the City keep doing to promote a culture of diversity, equity, inclusion and access?
- What 1-2 things should the City stop doing that is limiting its work culture?
- From a DEI perspective, have you ever felt uncomfortable at work at the City? Please explain.
- What 2-3 recommendations should the City consider to create a more welcoming and safe place for all employees?
- Please share any additional thoughts or perspective you would like to share.

These five questions made up the bulk of written qualitative feedback that MGT obtained over the course of this review. Upon receiving the feedback, MGT imported the qualitative data into our software and coded employee responses with various codes developed through identifying repeat sentiments. **Table 3-1** contains a complete list of codes as they apply to responses of the above questions. These codes are unweighted meaning that every code application is determined to be equally valuable to every other code.

TABLE 3-1. COMPLETE LIST OF QUALITATIVE CODES

Open Ended Questions	Thematic Codes	
What 1-2 things should the City keep doing to promote a culture of diversity, equity, inclusion, and access?	• Accurate Marketing Materials • Continue to Vet Complaints • Continue/Increase DEI Discussion/Training • Create Dedicated DEI Program • Treat employees Equally	• Expand on Observed Cultural Events • Hire/Promote more Diverse Staff • Improve Training & Job Development • Maintain Casual Work Environment • Maintain Status Quo
What 1-2 things should the City stop doing that is limiting its work culture?	• End 'Good 'ole Boys Club' • Stop Ignoring Historic Problems • Stop Ignoring Workplace Complaints	• Stop Nepotism Hiring • Stop Limiting Diversity in the Workplace • Stop Using Less Accessible Materials
From a DEI perspective, have you ever felt uncomfortable at work in the City?	• No • No, But Witnessed Some • Yes • Yes, Gender	• Yes, Harassment • Yes, Political Discourse • Yes, Race-Related
What 2-3 recommendations should the City consider to create a more welcoming and safe place for all employees?	• Accountability • Anti-Retaliation Policy • Dismantle Systems that Promote Racism • Diversify Interview Panels • Employee Feedback Surveys	• Hire/Promote More Diverse Staff • Improve Onboarding & DEI • Intertwine DEI into Policies • Provide Social Mixers • Provide more DEI Training
Please share any additional thoughts or perspective you would like to share.	• Improve City Life • Improve Work Environment/Relations • Policy Transparency	• Provide more Support to Existing Staff • Provide/Increase Cultural Literacy/Training

After coding the employee respondent responses, MGT was able to identify clear themes in the responses:

1. Continue and Increase DEI Trainings
2. Hire and Promote Diverse Staff
3. Improve Onboarding and Incorporate DEI

4. Provide Social Mixers

Each of these responses are described in detail below coupled with specific quotes from employees which have been redacted for privacy.

3.3.1 Continue and Increase DEI Training

An overwhelming number of respondents indicated that there is a desire for continued DEI training coupled with broadening topics covered by these trainings. Overall, the feeling towards the current DEI trainings are generally positive, but there is a desire for broader selection of topics. In MGT's experience a broad spectrum of various DEI trainings is beneficial for organizations as it broadens the ability of an organization to internally hold conversations around DEI topics in a culturally competent manner.

Work to Promote Tolerance, understanding, and a sense of togetherness in the community we serve. Additional housing options, mental health care, and addiction treatment resources for people in trouble would probably reduce the load on Parks, Police, Facilities, and Library.

Learning about DEI and access should be an acknowledged part of everyone's job description. It needs to be acknowledged that this takes time and resources. In addition, people should understand WHY it is part of their job description. Staff need to understand how Oregon City we will become a better City if all staff are given the time to learn about these important issues.

Continue on with these diversity meetings. I came from [Redacted] where we had an internal diversity council with representatives from each department

We need to see more diversity at the higher levels of leadership. We need to see more cultures and ethnicities represented and valued. Events, social media presence, etc. for visibility.

3.3.2 Hire and Promote Diverse Staff

A number of respondents have identified a lack of diversity among staff and leadership in particular. There is a recognition of a need to diversify staff in order to ensure broad representation across all departments and levels within the organization. DEI best practices indicates that the leadership of an organization should reflect the diversity of the staff and community in order to ensure that there is diversity of representation in the spaces where decisions are being made. Diversity in these spaces means that more points of view are considered before important decisions are made.

More People of Color in the Police Department

Expand recruitment efforts to targeted audiences

Hire more women in leadership roles

Actively recruit and hire individuals from all backgrounds/ethnicities/experiences

Hire more diversity. Oregon City is lacking heavily in my department

3.3.3 Improve Onboarding and Incorporate DEI

Several employees identified onboarding as a crucial site of DEI education. Employees recommend expanding the onboarding process to incorporate DEI training. This is helpful as it establishes early on in an employee's tenure with the City what the expectations around DEI are and that the City is committed to ensuring a diverse and equitable space to work.

Make sure welcoming of people of color is done correctly and professionally.

Demonstrate actively welcoming new staff and providing opportunities for them to meet others in their department and throughout the city.

Have an orientation session for new employees as well as physically introducing new employees to the various departments

I think that during onboarding the city should have a mission statement about what the City's culture and mission is.

The only thing I can think of [to improve DEI] at this point is to improve the onboarding process to include DEI training.

3.3.4 Provide Social Mixers

Several employees identified a desire for additional opportunities to interact with employees beyond the scope of their departments. This could take several forms including book clubs and affinity groups to larger all-hands events and townhalls. These opportunities are crucial for highlighting diversity within an organization and creating inclusion across departments. Due to the nature of government work, departments tend to be siloed, which can be isolating for people who may have broader representation across the organization, but don't necessarily have broad representation in their specific working group or department.

More cross departmental interactions (games, contests, gatherings)

More opportunities to meet staff from different departments

Book clubs and affinity groups we are so spread out it is challenging just to know other City employees generally.

Creating opportunities for employees to get to know each other in non-work focused situations

3.4 Employee Focus Group Feedback

MGT engaged with two employee groups to gain a better understanding of the organization's dynamics and how staff want it to change in the next three years. These two groups were Oregon City managers and Oregon City staff.

3.4.1 Oregon City Managers

When asked to describe the culture of the organization, City management noted the lack of diversity in its applicants as well as some observations about its internal programs.

"I've seen DEI stuff brought up in joking ways, things that were funny at one point, maybe not now."

The majority of City departments are made up of white males.

Blatant racism towards Black and Chinese people in recorded documents that have not been removed yet.

City management also spoke about noticeable shifts in behavior since the death of George Floyd. Two individuals noted the increased presence of confederate flag within Oregon City as well as increased support for it. This reframed how they perceived the presence of the flag.

[Staff has] "increased sensitivity in response to recent events."

"The city is evolving; we are at the beginning state of our evolution."

During MGT's meeting with Oregon City's management, participants identified some general problems within the City and some potential solutions. One problem is the lack of awareness of staff and the disconnect between Oregon City's community and its constituent parts. One proposed solution is to have more Commissioner interaction with Directors and understanding of the City's DEI goals and problems.

Another participant commented "the City lacks humanism… we try to stay away from feelings and we're always scrambling." The proposed solution was to increase the focus on improving the City's public image and embrace empathy as a practice. Finally, participants acknowledged that DEI cannot just be a fashion statement, it must be embraced genuinely. "The City needs more space to space and freedom to innovate."

3.4.2 Oregon City Staff

The staff group shared many observations about the nature of Oregon City's governing process and identified many barriers to overcome.

"We are a medium city that wants to be a big city. We need to have the money to do it right and elected officials need to truly back this."

[We] are unsure how to engage with someone who is different than them without being offensive accidentally.

Many staff members also commented that they felt like they were operating "in a bubble" or in a "siloed" manner. Staff members between departments aren't aware of what the other department is doing, and many of the inward-facing departments are less familiar with what their community is experiencing as well. While the Library and Police departments, outward-facing departments, are able to engage with the community and build rapport with it, the other departments are cut off.

When asked what would be true in three years if the DEI programs were successful, staff shared these thoughts.

"The idea that we'll be a small city is no longer the case."

"Every staff member can express themselves freely."

"There will be greater quantity and quality of training and education that expands our understanding and connects us."

"There will be willingness of staff to collaborate without fear."

"We will have more open and flexible leadership. We'll have openness to non-conventional perspective and practices, and we'll get rid of the idea that things have to be a certain way."

Oregon City's Staff recognizes that the City is going through a period of change. With that, more changes in how leadership acts are desired.

"The City will be better equipped to address different perspectives."

"We need 360 reviews for all leaders, we want improved performance appraisals that are accurate and indicative of our work."

3.5 Employee Engagement Summary and Recommendations

Throughout the assessment, MGT identified themes based on employee feedback. It is critical in any resulting plan from this assessment that the employee voice is heard and listened to. Based on the City of Oregon City's employee feedback, MGT recommends taking the following actions:

- Broaden and improve DEI training program
  - Unconscious bias/implicit bias training for people managers prior to conducting evaluations and hiring processes followed by regular updates to the training every few years.
  - Onboarding that incorporates DEI training
  - Training on US history and marginalization of minority groups
  - DEI training for Commission
  - Change management training
- Create all-hands social events
- Consider external community needs assessment
- Scale up diversity of hiring pools. Having a larger pool of diverse candidates increases the probability that the best fit for a role will be from a minority community.
- Conduct blind resume screening

- Commission should consider passing a resolution to be an anti-racist and inclusive community that is welcoming to all people
- Consider conducting a disparity study. Disparity studies determine if there exists evidence consistent with marketplace discrimination against minority and women-owned businesses. These studies provide the statistical evidence needed to determine the legal viability of race and gender-conscious policies that will assist in ensuring equitable procurement opportunities for all marketplace vendors.

4. Oregon City Community Qualitative Analysis and Feedback

4.1 Methodology

MGT engaged the community in three primary ways: a community DEI taskforce, community listening sessions, and a community survey. The community DEI taskforce consisted of nominees and volunteers. City employees were asked to nominate community members to participate in the taskforce. Community members also had the opportunity to volunteer to participate in the taskforce. In total, six meetings were held with taskforce members. The table below shows the meeting date and topic discussed during the meeting.

TABLE 4-1. COMMUNITY DEI TASKFORCE MEETINGS

Meeting	Date	Location
DEI Taskforce- Meeting #1	June 27, 2022: 7:30-9 pm	Commission Chambers
DEI Taskforce- Meeting #2	August 15, 2022: 7-8:30 pm	Commission Chambers
DEI Taskforce- Meeting #3	September 8, 2022: 7-8:30 pm	Commission Chambers
DEI Taskforce- Meeting #4	October 19, 2022: 7-8:30 pm	Commission Chambers
DEI Taskforce- Meeting #5	November 16, 2022: 7:30-9 pm	Commission Chambers
DEI Taskforce- Meeting #6	December 19, 2022: 7-8:30 pm	Virtual

In addition to the community taskforce, MGT hosted 4 community listening sessions. Two sessions were in-person only, one was hybrid, and one was virtual only. The table below shows the number of total participants per each session.

TABLE 4-2. COMMUNITY LISTENING SESSIONS

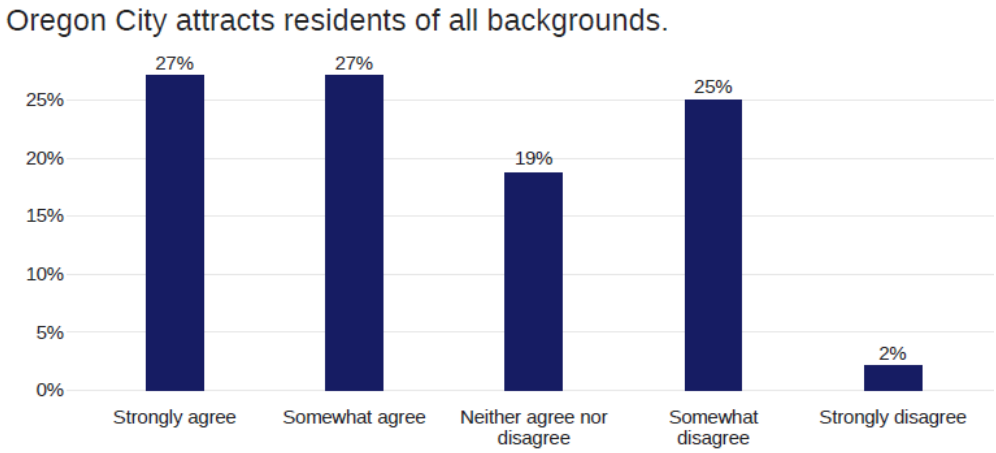
Listening Session Date & Time	Location	Number of Participants
September 7, 2022: 3-4 pm	Oregon City Public Library & Zoom	4
September 8, 2022: 3-4 pm	Oregon City Public Library	1
September 9, 2022: 12-1 pm	Commission Chambers	0
September 15, 2022: 6-7 pm	Zoom	4

The third method of engagement was a community survey. The community survey was open to the public from September 1 to September 30, 2022. In total, 60 people responded to the survey.

4.2 Community Survey Results

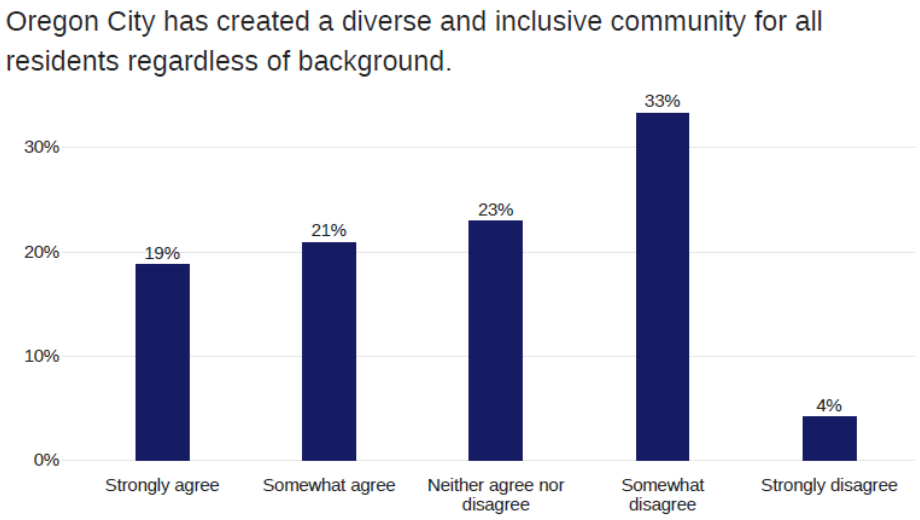
There were 60 community members that participated in the survey, but not every person responded to every question. This is not a statistically representative sample of the City population. Respondents had very differing views of the City and their experiences in the City. **Figure 4-1** through **Figure 4-3** show the variation in reactions to statements by all participants.

FIGURE 4-1. OREGON CITY COMMUNITY DEI SURVEY LIKERT STATEMENT RESPONSE



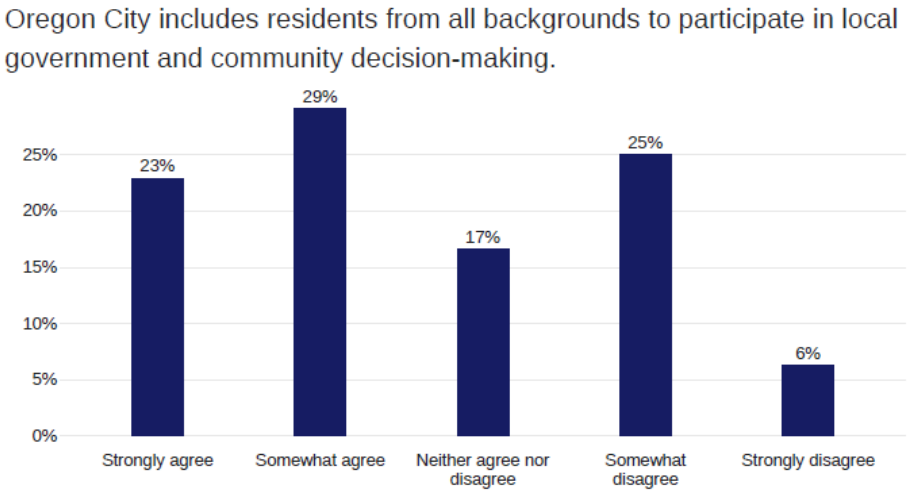
Source: MGT Consulting, DEI Community Survey 2022.

FIGURE 4-2. OREGON CITY COMMUNITY DEI SURVEY LIKERT STATEMENT RESPONSE



Source: MGT Consulting, DEI Community Survey 2022.

FIGURE 4-3. OREGON CITY COMMUNITY DEI SURVEY
LIKERT STATEMENT RESPONSE



Source: MGT Consulting, DEI Community Survey 2022.

Figure 4-4 shows that nearly half of respondents ranked housing as the highest priority for the City to address in regard to equity gaps. Almost 24% of respondents ranked policing as the second highest priority.

FIGURE 4-4. OREGON CITY COMMUNITY DEI SURVEY
RANK ORDER OF PRIORITIES RESPONSE

Please drag and drop the following to rank in order of highest (1) to lowest priority (7) for the Oregon City government to prioritize in respect to equity gaps (if any exist).

Prioirties	1 (highest)	2	3	4	5	6	7 (lowest)
Housing	45%	12%	19%	12%	5%	5%	2%
Policing	17%	24%	5%	14%	14%	7%	19%
Jobs/economic opportunity	14%	21%	33%	19%	10%	2%	0%
Health/health care	10%	17%	17%	29%	12%	7%	10%
Internet access/digital divide	5%	10%	14%	5%	24%	26%	17%
Public transportation	5%	10%	12%	12%	17%	36%	10%
Access to parks/open spaces	5%	7%	0%	10%	19%	17%	43%

Source: MGT Consulting, DEI Community Survey 2022.

Due to the low number of respondents and even lower number of respondents that gave responses to the open-ended questions, MGT is unable to develop and report out any themes from the responses.

4.3 DEI Taskforce Feedback

Oregon City's DEI Task Force described the City in many ways, but the most common terms were restrictive, potential, and homogenous. From the perspective of the community "it's hard to be a person of color in Oregon City." Task Force members shared examples of their gay friends and black family members not feeling comfortable walking home alone or visiting the City. Others discussed their personal experiences with feeling uncomfortable in their own neighborhood. As one participant said, "as a non-white woman, I had neighbors who were uncomfortable with me being chair of the neighborhood association, some left and never returned." There is a lot of work to be done to alleviate these feelings and alter the culture of the communities.

Following the in-person discussion, some of the Task Force members submitted additional anonymous feedback. One of the core themes was the need to alleviate poverty within the community. Affordable housing is a great first step, but more supportive programs are needed.

I believe it should almost be an anti-poverty program that includes low-income housing planning and development, as well as supporting programs for low-income housing residents such as:

- *Food security*
- *GED training*
- *Job training, counseling, coaching*
- *Scholarships for teens*
- *Career/post-grad education planning resources to teens*
- *Family-based support for working parents (beyond childcare, I'm not sure what else is needed there)*
- *Addiction, domestic violence, and mental health referrals and/or support services*

State and county safety net programs certainly exist, but they've long been insufficient to meet the needs of families. If the City were to offer supplemental programs to support low-income housing residents, current resident families would benefit. Combined with low-income housing options, these programs may also make Oregon City a more desirable place to live for underserved communities.

Having grown up in West Linn, but having observed Oregon City where my father had a business for 50+ years, those with experience have always noted that there are 3 Oregon City's

- *Downtown - Original Settlement and Economic Development Area*
- *Midtown - McLoughlin and related districts where common people lived as the Downtown filled out*
- *Hilltop and Ridgetop District - which is the most modern and economically vital area, which most new citizens have chosen to live in.*

The reason I gave you this breakdown is that there are distinct values in each of these areas and there are many "unresolved conflicts" that affect these areas and its people. I would be happy to talk with you about some of these differences because they will certainly have an impact on how DEI is integrated into those areas, the governing staff, and the City Commission, which I know wants harmony wherever possible.

4.4 Community Listening Sessions Summary

To understand the community of Oregon City, MGT hosted several listening sessions to solicit feedback from the community. During the four listening sessions, there were 9 participants. No identifying information was recorded. Comments in quotations are direct quotes and italicized comments have been paraphrased.

4.4.1 Oregon City is predominantly white

The culture of Oregon City can mainly be described as "varied." White or Caucasian citizens feel very welcome and are embrace by the community. However, people of color reported feeling like they were under more scrutiny. One of our participants shared her experience living in Oregon City with her black husband:

The culture here is welcoming to me as a white woman, but not welcoming to my black husband. I'll give you some examples because it's not always overt. When I walk with him in the park, I can feel people watching us and sometimes we're followed around. If I go to a coffee shop alone, things are normal, but if my husband is with me, the barista assumes we're not together and tallies the order after only taking mine.

Other participants shared these thoughts:

"Oregon City is relatively safe."

"I've noticed different experiences between cultural groups. There are different tones offered to white people compared to people of color."

"We're pretty inclusive but there are economic inequalities within the city too."

"I think it would be extremely difficult for a non-white person to integrate into the community."

4.4.2 Discussions and programs relating to DEI have been met with mixed results

While the majority of citizens are willing to embrace change, there is hesitancy to jump in feet first.

"We should offer more cultural events to expose people to different groups to build understanding and raise awareness."

"We need more ways to build connections that just school."

"The average person is not comfortable having those conversations or those terms."

If we weave more DEI terms into the conversation in more ways, people will become more used to them.

"Different people have a different understanding of what diversity, equity, and inclusion mean"

4.4.3 Concern about availability of resources and communication

When asked to expand on the idea of inequality within Oregon City, one participant shared her experience:

As a single mom, it's been very difficult to go back to work because finding resources for my young boys is very difficult. I rely on the public buses to get to work but the schedule doesn't always work with their school's schedule. It's difficult to find information or resources that would help us.

Other participants chimed in regarding resources. One offered that the City's website is offered in many languages but didn't know how accessible their outreach was. Another mentioned the City's heavy reliance on social media for outreach when informational post cards and leaflets fail. Many participants commented that they would like to know about what resources the City offers and how disadvantaged people are being helped.

Homelessness within the city was brought up many times as well. Participants observed an increase in homelessness within the city and were not aware of many programs to help support the homeless.

"I used to live in the city, and I was afraid there. The homelessness and theft were unreal. I consider my home in the suburbs to be paradise; I feel safe."

"I'm not aware of any mental health facilities or rehabilitation services for the homeless."

"I don't have a lot of information to understand what the city is doing to ensure equal access to resources."

"I would love to see more transparency on what's available."

4.5 Community Engagement Summary and Recommendations

Throughout the assessment, MGT identified themes based on community feedback. It is critical in any resulting plan from this assessment that the community voice is heard and listened to. Based on Oregon City's community feedback, MGT recommends taking the following actions:

- Evaluate current community engagement methods to determine the most effective way to communicate with the community
- Consider a study to evaluate economic gaps within the community
- Create more opportunities for community members to interact with each other and learn about different cultures

- Consider providing educational opportunities for community members to learn about DEI concepts

5. Recommendations for Improvement

Throughout the assessment, MGT identified suggestions based on best practice and employee feedback as well as gaps identified in the City's policies included in the review.

5.1 Suggestions Based on Policy Analysis

- Standardize hiring procedures and questions
- Create path to full-time employment for interns
- Standardize performance review process
- Consider expanding antidiscrimination to include the affirmation of preferred pronouns
- Create separate salary schedule removed from collective bargaining contracts
- Offer specific resources for minority groups
- Create paid parental leave program
- Include separative protection in anti-retaliation policy
- Eliminate gendered language

5.2 Suggestions Based on Employee Engagement

- Broaden and improve DEI training program
- Create all-hands social events
- Consider external community needs assessment
- Scale up diversity of hiring pools. Having a larger pool of diverse candidates increases the probability that the best fit for a role will be from a minority community.
- Conduct blind resume screening
- Commission to name desire to be an anti-racist and inclusive community that is welcoming to all people
- Consider conducting a disparity study. Disparity studies determine if there exists evidence consistent with marketplace discrimination against minority and women-owned businesses. These studies provide the statistical evidence needed to determine the legal viability of race and gender-conscious policies that will assist in ensuring equitable procurement opportunities for all marketplace vendors.

5.3 Suggestions Based on Community Engagement

- Evaluate current community engagement methods to determine the most effective way to communicate with the community
- Consider a study to evaluate economic gaps within the community

- Create more opportunities for community members to interact with each other and learn about different cultures
- Consider providing educational opportunities for community members to learn about DEI concepts

5.4 Recommendations

Based on the suggestions listed above, MGT's experience with similar municipalities and general best practice regarding DEI initiatives, MGT would like to present the following recommendations that the City should consider implementing and including in their DEI Action Plan.

- Organizational development improvements
  - Clarify roles and responsibilities of middle management and upper management
  - Provide a safe space for middle management to speak freely
  - Elicit more feedback from staff on a regular basis in the form of a pulse survey
  - Identify staff responsible for change management
- Reinforce importance of cultural competency
  - Values based performance metrics should be implemented
  - Provide people managers with additional training
- Demonstrate commitment to understanding DEI at all leadership levels and within the community (middle management, executive leadership, and City Commission)
  - Develop comprehensive DEI training plan with increased emphasis for leadership through events, festivals, and other cultural celebrations
  - Provide educational opportunities for community members to learn about DEI concepts
  - Conduct outreach at local schools and with minority organizations to showcase the types of career opportunities at the City
- Conduct a community assessment to determine opportunity gaps and limitations in economic mobility and disparate treatment of people from historically marginalized communities

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