

Reasons to support this request:

- **This position may reduce the risk that complaints transition into lawsuits against the City, which has legal and financial implications.** OEHR notes that this is another position that could help the City reduce legal risks by providing better technical expertise and a more consistent to Civil Rights complaints, which are currently managed by individual bureaus with limited support from OEHR staff.
- **Bureaus likely require more support than what is currently funded to understand and carry out their responsibilities under Civil Rights Title VI.** As discussed in several previous budget reviews, it is likely that the Civil Rights Program is under-resourced based on audit findings and comparisons of other jurisdictions. An overall plan has not been shared for what it would look like to adequately fund and structure this program; the bureau did receive funding for a new Civil Rights Title VI Analyst position that has not yet been hired.
- **It has been difficult to identify a third-party contractor with the capacity to undertake this work.** Supporting a position within the City would help to ensure that capacity is available to assist with complaints in a timely manner.

CBO reservations around this request:

- **Additional work is required to address outstanding questions about the role of different bureaus in Civil Rights Title VI implementation.** CBO has previously recommended¹¹ that the new Title VI Analyst position help the City undertake a comprehensive review of addressing compliance needs, including: strengthening data collection, analysis, and reporting; clarifying the roles of the Office of Equity & Human Rights, City Attorney's Office, Risk Management Division in the Office of Management & Finance, and individual bureaus in meeting the City's collective responsibilities under Civil Rights Title VI; and through a risk assessment and equity lens, identifying key priority strategies for identifying and eliminating barriers to access in City policies, plans, programs, practices, services, and operations.
 - **This may be more appropriately funded through interagency agreements.** Per City Financial Policies around [cost allocation methodologies](#), it may be more appropriate to fund this work through individual interagency agreements, as the level of service needed varies significantly by bureau. The bureau notes that there may not be a need for a full-time position housed in the Office of Equity, but it is possible that the City could explore the possibility of a shared position with the City Attorney's Office given their role in responding to these complaints.
6. The Mayor's Office has requested to create a **new LGBTQIA+ Liaison position**, which would expand the scope of the Office of Equity to include issues of sexual orientation and gender identity. This is not explicitly addressed in the bureau's pending strategic plan, but fits within the Office of Equity's intersectional framework.

Reasons to support this request:

- **This addresses a gap in the City's equity response that has been expressed by bureaus and**

¹¹ City Budget Office (2020). FY 2020-21 Budget Review, Office of Equity & Human Rights.
<https://www.portlandoregon.gov/cbo/article/754864>

