

Section	Summary of Comments	Quotes from Comments
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Summary of Public Comment

Standards for Neighborhood Associations, District Coalitions, Business District Associations, and the Office of Neighborhood Involvement

January 2, 2005

Prepared by Brian Hoop, Office of Neighborhood Involvement

Section	Summary of Comments	Quotes from Comments
General Comments		
Proposal is acceptable	<p>Neighborhood leaders, Associations and City officials who commented the proposal is fine as is.</p> <p>One City bureau director looks forward to ongoing discussion with the Public Involvement Task Force regarding responsibilities of City agencies. They're fine with proposed Code changes till the ongoing discussion resumes.</p>	<p>4 comments</p> <p><i>"I think you all did a great job on the guidelines or standards. It makes things very clear indeed. One could keep changing a word or paragraph ad infinitum, but I have read them through from cover to cover and think it is a job well done."</i></p> <p><i>"We distributed the materials and discussed the changes. Our NECN representatives have given their input and we feel comfortable with any and all changes. Our neighborhood charter puts us in pretty good shape."</i></p> <p><i>"At our board meeting this past week I informed everyone about the proposed changes to the ONI Guidelines. We talked about the changes that would directly affect Neighborhood Associations. After some discussion, it was felt that there was no need for you to come to our Board meeting. Thank you for your time and effort regarding this."</i></p>

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Proposals do not go far enough to give more power to Neighborhood Associations	Recommended language does not address progressive structural changes to neighborhood system such as requiring City bureaus to engage Associations in a more meaningful way, bringing back the Neighborhood Needs Assessment, Neighborhood Planning, having Coalitions and Associations intricately involved in the City budget process.	<p>2 comments</p> <p><i>“The timing of this new rule setting and further definition of what Neighborhood Associations are and are not may well conflict with the direction currently being developed by the Coalition Chairs and Directors. I think Council consideration should be deferred until the Chairs and Directors piece is ready and has been presented to Council. Then the Council should have some time to consider both and where conflicts need to be eliminated.”</i></p> <p><i>“I just re-read the position paper about ONI and neighborhoods written last year (11-15 at the ONI Summit) by Margaret Strachan, Summer Sharpe, and Ethan Seltzer. Compared to this paper and where ONI needs to go the revised guidelines are, seemingly, not very important. When you put this with the idea that the City Charter needs to be revised by giving more power to neighborhoods then you begin to see why I am not enthusiastic about commenting in depth about this effort to revise the ONI Guidelines...”</i></p>
Much of proposal should be rejected	Recommended language is very problematic and would limit the right of people to participate directly in City public involvement efforts.	<p>1 comment</p> <p><i>“The proposed changes to the ONI Neighborhood Association Guidelines are highly problematic. Instead of simplifying these for the most people to use, the ONI GREAT members have made using these documents more cumbersome and the anti-citizen theme of the proposals needs further scrutiny. If one returns to the purpose of Portland City Code , Chapter 3.96, that Nothing in this Chapter shall limit the right of any person or group to participate directly in the decision making process of the City Council or of any City agency, then one discovers that it is the most fundamental change that ONI seeks. The proposed revisions conflict with the City’s stated purpose for funding ONI and the Guidelines. These aspects need to be eliminated.”</i></p>

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Call these minimum Standards	Also, these Standards should be described as “minimum standards” that do not limit Associations from adopting other requirements for their own organizations.	One comment
Relationship with other City agencies	Proposed Guidelines do not clarify relationship between other City agencies, ONI neighborhood programs, District Coalitions and Neighborhood Associations. Need more detailed outline of how all will cooperate on public involvement efforts. How do ONI and Coalitions assist City bureaus? How are City bureaus held accountable to follow minimum public involvement standards?	Two comments
Dislike having to update bylaws	Neighborhood Associations should not be required to redo bylaws because Guidelines/Standards change. Too much bureaucracy.	One comment
Call them regulations	The proposed Standards should be called “Regulations.”	One comment
Use of non-profit	Suggestion to be consistent with the use of either “Non-Profit” or “Not-for-Profit”. One or the other. Provide an explanatory statement of state law for volunteer groups vs. non-profits 501-c-3’s.	One comment <i>“They are two distinct business organizational arrangements. They are not the same!”</i>
Civil rights of those accused of violations of City rules	Would like the Standards to address issue of checks and balance in City’s community policing program. Concern that neighborhood watch and foot patrol type programs do not protect civil rights of those being accused of wrongdoing. Does not approve of confidentiality protections for those who report violations of City rules, i.e. nuisance code for example. He would like to know who is reporting on him.	One comment

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Updating bylaws	Bylaws updates need to be regularly scheduled so they don't stay outdated due to changes in state law.	One comment
Non-discrimination clauses not identical	Non-discrimination clauses need to be identical. Check: <ul style="list-style-type: none"> <li data-bbox="346 326 499 354">❑ III, A, 3 <li data-bbox="346 362 531 389">❑ IV, C, 2, a <li data-bbox="346 397 531 425">❑ VI, A, 1, c 	One comment

Section I: Purpose Statement

Purpose Statement Section I	Clarify proposed Standards are minimum and not an impediment to Associations establishing bylaws or policies which go beyond the intent of these minimums.	One comment <i>“Will the ONI guidelines serve as a set of Minimum Guidelines or must we subscribe to all the guidelines even if our policy takes the guidelines intent a step further? I believe, the ONI guidelines should state they are MINIMUM GUIDELINES. “</i>
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Section II: Definitions

Section II, A & B Definition of Neighborhood vs. Neigh. Assoc	Definition of Neighborhood Association should be left as original language. Neighborhood Associations existed before the City began to recognize them. Proposed definition is too limiting.	One comment <i>“ In the existing Guidelines, the first two definitions, concerning Neighborhood Association and Recognized Neighborhood Association, should be left exactly the same as it appears. “</i> (See original comment for more.)
Section II, B Definition of Neighborhood Association	Suggestion that the definition of Neighborhood Association should acknowledge a residential component since we added the residential requirements that Neighborhood Associations need to have minimum of 200 households and 100 acres. See related comments below regarding concern of NW neighborhood Association that is primarily composed of industrial businesses.	One comment

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Section II, E Definition of ONI, Enforcement powers of ONI	ONI's enforcement powers (responsibility to enforce the City's statute 3.96) needs to be recognized. Also, ONI's role in deciding grievances needs to be shared with the organizations and their people.	One Comment <i>"In defining ONI in the revised Standards, there is no reference made to ONI's enforcement powers. This needs to be added. ONI's responsibility to enforce the City's statute 3.96 as a regulation needs to be highlighted and recognized."</i> (See original comments for more.)
Section II, E Definition of ONI, Inclusion of City agencies	"City agencies" needs to be added to the list of stakeholders where ONI's purpose is defined. Concern is including City agencies as a partner in ONI's communication strategies between the neighborhood system and City agencies.	One comment

Section III: Neighborhood Associations

Section III, A, 1, a, i and ii Creating or modifying Neigh Assoc boundaries	Items i and iii need to be amended to read as follows: i. Neighborhood Associations are responsible for determining their own boundaries and describing them accurately in their bylaws, subject to approval by ONI. ii. All changes in boundaries must have the written consent of all the adjoining Neighborhood Associations affected. ONI shall not be permitted to recognize any neighborhood association that overlaps any other neighborhood association without their written consent.	One comment <i>"In effect, neighborhood associations who do choose to overlap pre-existing neighborhood associations, without written permission, would not be permitted "recognition" status by ONI or the City, nor would they receive City funds and benefits. Hence there would be no problems associated with boundary overlaps and it would be forever solved and not cost the City or associations legal fees. "</i>
Sec: III, A, 1, a Creating or modifying Neigh Assoc boundaries	Overlapping boundaries should not be allowed. ONI needs to determine non-overlapping boundaries with input from respective Neighborhood Associations if they can not determine it on their own.	One comment <i>"... Inherent in the democratic principle of one-man one vote is the limitation to vote for only one president, one governor, one mayor and one neighborhood leader based on your residence. Apportionment of certain government programs and legislative rights adhere to a singular neighborhood address. ... Officially sanctioning territory within our city to be part of</i>

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Section III, C, 3 Resolution of Boundary Disputes		<i>more than one neighborhood is undemocratic and anathema to the basic construct and purpose of government. The city's sovereign right and its historical obligation to clearly define officially recognized neighborhood boundaries is not a debatable issue. "</i>
Section III, A, 1, a, v Creating or Modifying Neigh Assoc Boundaries, all industrial neigh assoc.	<p>Two Neighborhood Associations are primarily composed of businesses. NW Industrial N. A., specifically has no residences. Concern is proposed language could harm NINA if in the future they had to reform and would not meet this requirement because they have no houses. Simply add businesses.</p> <p>East Portland chairs comment there should be no limits. Concern that Woodland Park is smaller than this minimum.</p> <p>Suggested language:</p> <ul style="list-style-type: none"> ❑ The minimum geographical size of Neighborhood Associations would require 100 acres and 200 households and/or businesses. Existing associations smaller than this would be grandfathered in. 	Three comments
Section III, A, 1, b Resolution of Boundary Disputes	<p>Strike the entire section concerning "Overlapping Boundaries." Replace it with the following:</p> <p>Any overlaps which exist at the time of the adoption of these Standards that does not conform to section III, A, 1, a, (i) above, shall be resolved by determining which boundaries were first approved or acknowledged by the City.</p>	One comment <i>"Make the process specific and clear. End of story. "</i>
Section III, A, 1, c Boundaries falling outside City limits	<p>Please change the last part of this sentence from "or the City" to "and/or the City".</p> <p>This would ensure that the City is not held liable for providing any services to residents outside of the City.</p>	One comment

Section	Summary of Comments	Quotes from Comments
<p>Section III, A, 2</p> <p>Membership</p> <p>Issue of worker-owned businesses</p>	<p>Membership needs to clarify that coops and businesses should be permitted to designate a single representative to represent them, regardless of ownership structure. Co-ops are equally owned by many people. The existing language would suggest they could all be members representing that one business.</p> <p>Also, question asked if it is discrimination to not allow individuals under the age of 18 to be members of an association? Some Associations do have this limitation.</p> <p>Suggested language from Portsmouth: ”Membership shall be open to any person who lives, rents, or owns property within stated boundaries of the neighborhood association. It shall also be open to one voting representative from each business, organization, church, or government agency, which exists within the boundaries of TCAP. To become a registered member, one Community Forum or Board Meeting must be attended prior to registration. Registration may be completed by signing the membership list, available at board and community forum meetings.”</p>	<p>5 comments</p> <p><i>“The guidelines do not address the unique nature of Co-op businesses. Legally, each member of a coop is an equal owner of the business/property/etc. Under the proposed guidelines, it would appear that every member of a coop would be considered a member of a neighborhood. Coops and businesses should be permitted to designate a single representative to represent them, regardless of ownership structure. This is not to say that other owners or employees of a coop or business who lived in a neighborhood, or who were otherwise entitled to membership, could not partake, but only one could be designated as the official representative of that business.”</i></p>
<p>Section III, A, 2</p> <p>Membership</p> <p>Issue of membership lists being public records</p>	<p>The section defining “Membership” states “The list of the membership is the property of the Neighborhood Association and is not subject to public records requests.” This should be corrected to identify a neighborhood association’s membership lists as public records, therefore subject to public records requests.</p> <p>Others feel it is important for contact information of members to not be subject to public records requests.</p>	<p>Two comments</p> <p><i>“ The list of the membership of a “recognized” neighborhood association is a public record and it should be defined as such. This is because a “recognized” neighborhood association opts in and may choose to receive the public money available. Therefore this should mean that their membership list are available for public inspection, because they are using public funds, precisely why they should be held accountable for having members that are legitimate. A neighborhood association may keep its membership list private, by not being “recognized” and therefore not eligible to receive public funds. “</i></p>

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Section III, A, 4 Bylaws, post on the web	Bylaws should be posted on the City’s ONI website. This would make them easily accessible to all.	One comment
Section III, A, 4 Bylaws and non-profit status	Bylaws should only be required if the Association is a non-profit. (not not-for-profit.)	One comment
Section III, A, 4 Bylaws, process vs. contractual	Concern there is confusion between process and contractual obligation with the first sentence: “Maintain and file with the Office of Neighborhood Involvement and appropriate District Coalition.”	One comment
Section III, A, 4 Bylaws Issue Assocs. turning in bylaws, minutes, contact info	Make it clear what documentation Neighborhood Associations need to turn in to their Coalitions or ONI. Recognize that unaffiliated Associations need to turn in their bylaws, minutes, and leadership contact info directly to ONI. <ul style="list-style-type: none"> ❑ Section III, A, 4, Bylaws needs to say unaffiliated Associations turn bylaws in to ONI. ❑ Create new section for sending updated contact info for officers and board members to Coalition offices or ONI for unaffiliated Assocs. ❑ See Section VIII, L, 2, Minutes. Need to add that unaffiliated Associations turn their minutes in to ONI. 	One comment
Section III, A, 5 Meeting requirements, minimum number of meetings per year	Neighborhood Associations should have to hold a minimum number of general meetings per year where all members have a voice and a vote. Concern expressed an increasing number of Associations have regular board meetings but have only rare general membership meeting or no general membership meetings at all. This seems undemocratic that only board members could vote at the board meetings being held.	Three comments <i>“We have some safeguards requiring democracy. For whatever body that is meeting, we have a requirement that each member have one vote and decisions must be made by a majority vote. But I don’t see any requirement for general membership meetings.”</i> <i>“If a Neighborhood Association is incorporated, it should be a</i>

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	<p>Suggestion:</p> <ul style="list-style-type: none"> □ A requirement of a minimum number of general membership meetings per year, like one per year or each quarter, or a system for holding a general membership meeting if one or more members call for one. 	<p><i>membership corporation. ORS 65 requires one membership meeting a year, and limits authority of the members to electing the Board. The most common variation allowing other authority to the members is requiring members to approve changes to the bylaws. However, additional authorities must be shown in the Articles of Incorporation, if the NA is incorporated. “</i></p>
<p>Section III, A, 6</p> <p>Open Meetings/ Public Records, continue following state law</p>	<p>Require Neighborhood Associations to continue following state open meetings and public records law. Therefore under Section III, A, 6: Open Meetings/Public Records amend “Abide by the open meetings/open records policy.” The word “policy” should be replaced with the word “law” and strike everything else.</p>	<p>One comment</p> <p><i>“A. Blurring the issue makes it a more complex concept. We already have public meetings and public records laws. If a neighborhood association desires to be “recognized” by the City then it should be subject to the laws we already have. A neighborhood association may opt out and not be a “recognized” neighborhood association.</i></p> <p><i>B. In exchange for “recognition” a neighborhood association should agree to adhere to city and state laws concerning public meetings and public records laws, moreover ONI should expect and enforce it.</i></p> <p><i>C. It is wrong for the City and ONI to be creating a different standard for neighborhood associations. “ (See original comment for more.)</i></p>
<p>Section III, A, 8</p> <p>Dues</p> <p>And non-profit corporation status</p>	<p>Existing and proposed language regarding dues “Collect membership contributions on a voluntary basis only” should be deleted and replaced with the following new language:</p> <p>“A recognized neighborhood association shall be a non-profit corporate entity, domestic or foreign, with members. Any recognized neighborhood association, which is not an active corporation, upon the adoption of these regulations, will be de-recognized by ONI, unless they file their corporate papers with ONI. Dues are permissible.”</p> <p>Also, others feel the language is confusing since they read it to mean dues are allowed, which is not true. They don’t want dues to be allowed.</p>	<p>Three comments</p> <p><i>“ A “recognized” or otherwise neighborhood association should be a legitimate entity. There (sic) non-profit status should be their only financial constraint. The idea is to increase communication, not to be enforcing government imperatives concerning how non-profits survive financially through fund raising. That is the job of the I.R.S. not ONI or the City of Portland.”</i></p> <p><i>“I do not support dues for Neighborhood Associations as this will limit access to only those who can pay.”</i></p>

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Section III, A, 9 Involving Business District Associations	Supports involving Business Association members and business owners in general in Neighborhood Association participation.	One comment <i>“The primary issue we wish to posit is that businesses are a component of the neighborhood, just like residents, organizations, and institutions. If we exclude any component, the neighborhood isn’t fairly represented. “</i>
Section III, A, 9 Involving Business District Associations	Strike this section entirely. Business owners should participate in their respective Neighborhood Associations. It is not appropriate for ONI to be assisting business associations.	One comment <i>“A business or business association, if it meets the criteria of a member of a neighborhood association, usually defined in the association’s bylaws, then these individuals can be a member of a neighborhood association. City and ONI staff seemingly is attempting to promote businesses and their associations to “participate on governing bodies of neighborhood associations.” Why? This is not an appropriate thing for ONI to be engaged in. ONI should focus its concentration on neighborhoods and their associations not businesses and their associations. “</i>
Section III, A New topic not already addressed Election and Term limits of officers	Suggestion to have limits on the length of term for board members or officers. Right now, nothing prohibits a president from being elected to a term of five, ten, or more years. Or word it another way by requiring elections every year for every elected person. Right now, we say very little about elections. Alternative suggestion to require elections of officers to occur every year or a minimum of every two years.	Two comments <i>“A maximum 2-year term for officers would not exceed the language currently in the bylaws of NWNW neighborhoods. Most limit officers’ terms to one year, but their manner of election varies between member-elected to board-elected. ORS 65 limits Directors’ terms to 5 years, but does not address officers. We may also wish to address terms for Directors; terms of greater than three years seem excessive. Many bylaws also have term limits for officers and directors, in various configurations. “</i>
Section III, A New topic not already addressed New business	Concern has been expressed of Associations are not providing adequate time for new business items to be discussed or a process for consideration of new business. Suggestion to have language that either allows agenda items to be added by a majority vote or, if bylaws give the president the right to set the agenda, language that requires the	Two comments <i>“I would support language requiring some mechanism for adding items to the agenda. Some neighborhood bylaws include language which allows a certain number of board members or members to automatically include an item on the agenda.” Mark Sieber, GREAT committee member, NWNW Director</i>

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agenda items from members	president in good faith, considering time limitations, priorities, etc., to add items requested my members.	“...by Roberts Rules of Order, the agenda should be voted on at the beginning of the meeting which allows for change by the membership.... It would seem the check would be removing the president by voting them out of office.”
Section III, B, 1 Benefits..., Directories	Directories should not be used for political campaigns of any kind. Ban this. That’s what county voter registration records are for.	One comment
Section III, B, 2 Benefits..., Maps	Item 2 states “Placement of official Neighborhood Association maps.” The words “Neighborhood Association” should be replaced with the word “City.”	One comment <i>“ Accurate and appropriate placement of neighborhood associations on all City maps use and distributed by the City should be the norm.”</i>
Section III, B, 3 Benefits..., Notification	Concern that planning and design commissions are not following this rule of notification about matters falling with a neighborhood association.	One comment
Section III, B, 3 Benefits..., references in City Code	Clarify where in the City Code notification by City agencies is required on matters that fall within the Neighborhood Association boundaries.	One comment
Section III, B Benefits... Neigh Assoc. Relationship with City Council	There needs to be a more defined role for Neighborhood Associations before City Council. This might include requiring/or at least a direct invite to the Association to comment on Neighborhood livability proposals impacting their neighborhood, for example. Need to get more feedback from East PDX chairpersons.	One comment

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Section III, C, 1 Operation of Neigh. Assocs., Communication	The aspect of including Business District Associations in Neighborhood Association communications should be removed. This person has previously proposed Business Associations should be completely removed from Standards.	One comment
Section III, C, 2 Mediation	<p>Suggestion that description of mediation efforts for Neighborhood Associations should read similarly as the proposed language for Business Associations which encourages mediation for internal disputes as well as external disputes with other organizations.</p> <p>Each Neighborhood Association is encouraged to seek mediation among themselves and/or other Associations, organizations and entities if disagreements arise over issues.</p> <p>Also, question raised why Business Associations are specifically called out for mediation with Neighborhood Associations?</p>	Two comments
Section III, C, 3 Resolution of Boundary Disputes	<p>Strike the introductory sentence for this section out entirely. Replace it with the following:</p> <p>Disputes Arising From Boundary Overlap Agreements: Where a boundary dispute arises between two or more neighborhood associations who have previously agreed to a boundary overlap, any dispute arising from the agreed overlap, or one of the parties desires to withdraw from said agreement, will be resolved as follows. Then proceed with the proposed a, b and c.</p>	<p>One comment</p> <p><i>“ This was addressed in a section previously. Boundary overlaps will be resolved, because ONI simply will not be allowed to permit it, unless the overlapping associations have letters of agreement. Otherwise, there would not be any overlaps period. Where disputes arise over previously agreed boundary overlaps, ONI and the City need to prepare a provision. Associations should not be locked in to these sorts of agreements, as people and things change. “</i></p>
Section III, C, 3, b, and c Resolution of	<p>Replace III, C, 3, a and b with:</p> <p>“If a solution to the boundary dispute cannot be reached by the affected Neighborhood Associations, they may request a decision from the District Coalition board or from ONI. If</p>	<p>One comment</p> <p><i>“Overall, this suggestion allows only those who are affected to decide, hopefully based on the worth to them of the two</i></p>

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Boundary Disputes, allow a vote of affected residents	this cannot be agreed upon, then the boundary dispute shall be resolved by a vote of the residents of the affected area. Before any such process is undertaken to resolve a boundary dispute, it shall be clearly described and agreed to in writing by all affected Neighborhood Associations. The results of any such process shall be final.”	<i>competing Associations. Using this technique an appropriate decision will be made and no one can blame City Hall. An equally important concept is that ONI is not entangled in a difficult decision making process.”</i>
Section III, C, 3, 5 Liaisons to District Coalition Boards	Would prefer District Coalition boards be project oriented to their district vs. being issue oriented. Also, other concern: What about fiscal policies that need to reflect this taking advantage of services without taking responsibility?	Two comments <i>“Neighborhood Association liaisons to District Coalitions are hard to recruit. Delegates feel Coalition meetings are boring and irrelevant to specific neighborhoods. As it is, there are several NA’s that have no representation on DC boards.”</i>

Section IV: District Coalitions

Section IV, B Coalition role in assisting City agencies	Add statement that District Coalitions have a role in assisting City agencies in the development of public involvement strategies to reach diverse communities within the coalition area. Again, addresses issue of what role should Coalitions and ONI have in assisting City agencies with their public involvement strategies.	One comment <i>“We understand that the District Coalitions’ primary role is to help the individual neighborhoods be successful and develop the capacity to give thoughtful and effective input. At the same time, City agencies look to the Coalitions for advice as to how to best reach those individual neighborhoods. This is an important Coalition role that serves to strengthen relationships and ensure that input is sought, given and received in the most effective ways possible.”</i>
Section IV, B, 1, a Coalition Annual Action Plan	Development of annual action plan should be directed by “the board of District Coalitions as representatives of Neighborhood Associations” instead of the proposed directed by “Neighborhood Associations.”	One comment
Section IV, B, 2, a, i	Concern District Coalition has attempted to exert influence over content of Neighborhood Association newsletter as well as positions Associations don’t agree with.	One comment <i>“District Coalitions have tried to dictate, alter, and changed wording of what goes in neighborhood association newsletters</i>

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Communication, Responsibility for content		<i>without the permission/approval... NA did not want “political” verbiage in an “informational” newsletter.”</i>
Section IV, B, 2, a, ii Communication, Public record	14. In the proposed Standards, under District Coalitions, item B (2), section ii reads: “All positions taken or recommendations voted on are matters of record.” The word “public” should be placed before the word “record, thus making it “matters of public record.”	One comment <i>“ District Coalitions are public bodies, they contract with the City and they get public money. Therefore all of their records should be public. “</i>
Section IV, B, 2, a, iii Communication, Positions on political candidates and ballot measures	<p>The City should not be allowed to prohibit positions being taken by Associations on political races and printed in papers since the City only provides \$1000 a year for newsletters. Many Associations are increasingly funding their newsletters primarily from private sources.</p> <p>At a minimum, make language more clear stating “Neighborhood Associations may take positions on ballot measures.” Current language is vague. Says no positions on political candidates, yet leaves the reader wondering if you can take positions on ballot measures.</p> <p>The prohibition of Associations taking positions on political candidates should be separated from the prohibition on using City funds to print statements in support or opposition to candidates. The prohibition on taking positions would better fit in separate sections III.A. and IV.B.2.</p> <p>One person understood we were requiring that each newsletter be submitted to the Chair of the coalition of a respective neighborhood association for approval of content. This would be a burdensome step in the process. It also presents a form of censorship.</p>	5 comments <i>“We get less than \$1000 in city money to print our newsletter. This does not even pay for one of our four issues. The balance of the money needed for us to print the newsletter comes from advertising. Because most of the money comes from private sources, I do not think that the city can state that the newsletter cannot print endorsements. We could argue that the newsletter in which the endorsement appears is one, which is privately funded. Can that be disputed? It is hypothetical, but I think it is an important question that should be addressed in the policy statement.”</i>

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IV, B, 2, a, vi Communication, Sending newsletters to City agencies	<p>City agencies should receive copies of neighborhood and coalition newsletters when issues pertaining to that department are discussed in that issue.</p> <p>Also, recognize that not all Associations have newsletters but might have columns in for-profit community newsletters. Are they responsible to file those?</p>	Two comments
IV, B, 2, a, vii Communication, Mailing lists of Coalitions	<p>Mailing (or membership) lists of District Coalitions, and by extension their respective Neighborhood Associations, should be records that are open to the public. This should be changed, indicating that coalitions' mailing lists are subject to public records laws.</p>	<p>One comment</p> <p><i>"A District Coalition should abide by public records and public meeting laws. Coalitions are organizations created entirely by the City of Portland and some are to be staffed by city employees."</i></p>
IV, B, 2, b Inclusion, Encouraging learning about cultures of people of color	<p>Wants more to be done to encourage Neighborhood Association participants from the dominant culture (white) to learn about the cultures of people of color and ways to make neighborhood meetings more accessible.</p>	<p>One comment</p> <p><i>"All too often the dominant culture assumes that people of color must learn their culture (dominant) but little, if any, attempt is made by the dominant culture to learn about the culture of people of color. And this goes beyond memorizing trite trivia facts that read like media stereotypes. We need to have an open, honest dialogue from the heart. Our current diversity programs are geared towards guaranteeing the comfort level of the dominant culture and little attempt is given to safeguarding the safety of people of color. Is it any wonder that few people of color join Neighborhood Associations?"</i></p>
IV, B, 2, b Inclusion, Developing work plans together.	<p>There is a disconnect if we do not require Coalitions to work with Neighborhood Associations in developing inclusion and participation strategies in their work plans together. Proposed language only requires Coalitions to act, which might send the message Associations are relieved of any expectation.</p>	One comment

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IV, B, 2, b, i Inclusion, listed constituencies	<p>Concerned about listing of constituency groups to target outreach efforts. Might leave someone out.</p> <p>Also, not necessary to say “Portland’s”. Assumed throughout this is for the City of Portland.</p>	One comment
IV, B, 2, b, iv. Inclusion, Who pays	<p>Concern with who is paying for translation and interpretation services.</p> <p>Also, concern there needs to be more description of what resources and technical assistance ONI will specifically provide to assist with diversity outreach efforts.</p>	Two comments
IV, B, 2, b, vi Inclusion, Assisting City agencies	<p>Add new section, vi, “Work cooperatively with City agencies to develop and implement effective outreach strategies within the coalition area.”</p> <p>Again, addresses issue of what assistance should ONI and Coalitions provide to City agencies with outreach to diverse constituency groups.</p>	One comment
Section IV, C Unique to Non-profit Coalition, Board majority	<p>Add to introductory statement that Neighborhood Association delegates to a District Coalition board need to be the majority of DC boards, not at-large positions.</p>	One comment
Section IV, C, 1, a Non-profit status	<p>Should be listed as a “non-profit” instead of a “not-for-profit”. Need to be consistent.</p>	One comment
Section IV, C, 2 Bylaws on web	<p>Coalition bylaws should be posted on the ONI web site, and ONI should have a copy on file. This should be a requirement of the Coalition’s contract.</p>	<i>Two Comments</i>

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and regular updates	Bylaws should be updated on a regularly scheduled timetable.	
Section IV, C, 2, b Bylaws, rewriting them	Concern that requiring Associations and Coalitions to follow new Grievance procedures will require many groups to rewrite their bylaws.	One comment
Sec: IV, C, 3, b Affirmative Action policies	Affirmative Action policy should be on the web site.	One comment
Sec: IV, C, 3, c Staff salaries	Concern that proposed language removes ONI from budget equity conversation. Need to be explicit in the role ONI has in establishing salary equity.	One comment
Section IV, D Unique to City-staffed Coalitions, Neigh. Assoc. role in work plan	Current language in introductory statement only says advisory boards made up of Neighborhood Association representatives “may” assist with development of work plans. There needs to be a directive requiring the inclusion (i.e. “shall”) of Neighborhood Associations.	One comment
Section IV, D, 3 Memorandum of Agreement	Need to explain who shall develop these “Memorandum’s of Agreement”. Currently there is no directive as to who is responsible to develop them.	One comment

Section	Summary of Comments	Quotes from Comments
<p>Section IV, E, 1, a</p> <p>Process for the Creation of a new Coalition, Minimum number of Associations</p>	<p>Proposed minimum of six Neighborhood Associations for the creation of a new coalition excludes the unique circumstances of some parts of the City, such as the central city. Downtown and Old Town Chinatown have been pursuing creating a central city coalition due to their unique characteristics. One commenter suggests Lloyd District should be in on this Coalition too. Use an alternative measurement such as total population, density, crime statistics, or an agreed upon combination of factors to define newly formed coalitions.</p> <p>Comments point out past attempts being aligned with existing Coalitions. But there was a significant cultural difference with existing Coalitions that tend to be more residential in character.</p>	<p>4 comments</p> <p><i>“If (the current proposal) passed, we would need to attract additional associations to the table by stealing current associations affiliated with other established coalitions or support the creation of additional associations within our currently accepted neighborhood boundaries. Neither of these options is grounded in the spirit of neighborhood involvement. That said we do not believe that our history as a city that values neighborhood outreach and participation is benefited by setting rules to permanently exclude associations with closely aligned concerns from accessing additional neighborhood funding and permanent staff.”</i></p> <p><i>“Please consider using an alternative or different measurement such as total population so as not to permanently exclude those very groups who are already disenfranchised from the District Coalition structure.”</i></p>

Section	Summary of Comments	Quotes from Comments
<p>Section IV, E, 1, h</p> <p>Process for the Creation of a new Coalition, Role of District Coalitions</p>	<p>This section does not adequately address the role of District Coalitions in agreeing to such a change. Their authorization needs to be included.</p> <p>In section IV, E, 1, g and h: There needs to be more criteria in the decision-making process of the Director of ONI.</p> <p>In section IV, E, 1, h: Take out the word “why”. Its not needed after the word reason.</p>	<p>Two comments</p>
<p>Sec IV, E, 1, o, v</p> <p>Process for the Creation of a new Coalition</p> <p>Sec: IV, E, 4, g, v.</p> <p>Changing from a City-staffed to a Non-profit Coalition and vice-versa</p>	<p>These sections describe process for consideration of changes in organizational affiliation of Neighborhood Associations and District Coalitions. The following sentence is seen as vague: “...except those specifically referring to service delivery structural issues.” Suggestion is to eliminate this and stick to “Meet all requirements of District Coalitions as set forth in these Standards” as sufficient.</p> <p>Also, need to clarify statement: “Meet all requirements of District Coalitions...” Do we mean City or state and federal 501-c-3 non-profit requirements? Please clarify.</p>	<p>Two comments</p> <p><i>“The way the document is structured, there are requirements for District Coalitions plus the specific requirements appropriate to the two operating structures. As long as we refer to “requirements for district coalitions”, I think it will be appropriately construed as the general requirements plus the specific requirements for the operating structure. If there is some specific issue that is addressed by this phrase, perhaps it could be stated explicitly so the phrase isn’t interpreted in strange ways.”</i></p>
<p>Section IV, E, 3, sub-categories f, g and h</p> <p>Process for Neigh Assoc’s moving from one Coalition to join another</p>	<p>Simply eliminate subcategories f, g and h. Neighborhood Associations should be able to automatically move from one coalition to the other based on existing processes for resolving boundary disputes. Sections f, g and h would eliminate any role of ONI in the approval process.</p>	<p>One comment</p> <p><i>“A. There is already a process for resolving boundary disputes. A neighborhood association should decide if it wants to be a member of a coalition. If a neighborhood association votes to withdraw from a particular coalition, then the boundaries automatically change.</i></p> <p><i>B. Concerning item g, making decisions should never be based upon how “the Director of the Office of Neighborhood Involvement feels.” Facts are important in such decision making processes, not how the Director feels that day about a particular neighborhood association or coalition. “</i></p>

Section	Summary of Comments	Quotes from Comments
Sec: IV, E, 3, i Process for Neigh Assoc's moving from one Coalition to join another	Copies of minutes with the decision made should also stay with original District Coalition.	One comment
Section IV, E, 4, c through e. Changing from a City-staffed to a Non-profit Coalition & vice-versa, role of Coalitions	This section does not adequately address the role of District Coalitions in agreeing to such a change. Their authorization needs to be included.	One comment

Section V: Office of Neighborhood Involvement

Section V Use "Bureau" to describe ONI	Throughout this section the term "Bureau" is used over and over to describe ONI. The use of the word "bureau" should be eliminated and replaced simply with ONI.	One comment
Section V Inclusion of City agencies	1 st paragraph – please include "input from City agencies" in the development of ONI's annual work plan. What input should other City agencies have in development of ONI's work plan?	One comment
Section V, A, 1 Role of BAC and Neigh. Assocs. in guiding ONI	Need to define role and composition of ONI Bureau Advisory Committee within the Standards. Need to increase role of Neighborhood Associations in developing ONI programs, budgets, and policies.	Two comment

Section	Summary of Comments	Quotes from Comments
Section V, A, 2 Neighborhood summit	Summit should not be politicized. Don't allow political campaigns or issues to be present. Takes away from Neighborhood Association projects.	One comment <i>"Friends of the Reservoirs and the Greens should not have been at the last summit."</i>
Section V, A, 4 Network of City public involvement staff	Add new section V, A, 4: "Facilitate communication with bureaus regarding current or upcoming issues and projects." ONI should coordinate ongoing gathering of City public involvement staff, which has been organized informally in the past but has not met for several years.	One comment
Section V, B, 3 Advocate for neighborhood funding	This paragraph does not seem appropriate under "contract management". Other view: Add back in the ONI responsibility for writing grant proposals for neighborhood system. This is in existing language. It says: "Assist District Coalitions/neighborhood offices and Neighborhood Associations in identifying and submitting proposals for alternative funding sources for expanding citizen participation services."	<i>Two comments</i>
Section V, C, 1 Leadership skills training for other City bureaus	Organize and support skill development in City agencies. This is an issue that has also been an informal role of ONI's in the past and has been considered perennially as part of its work plan.	One comment

Section	Summary of Comments	Quotes from Comments
<p>Section V, D</p> <p>Inclusion and Participation, These are important, but no unfounded mandates</p>	<p>City needs to commit to providing adequate funding to provide these services so they aren't un-funded mandates. Funding for interpretation, translation, and childcare assistance would be most critical.</p> <p>Other comments:</p> <ul style="list-style-type: none"> ❑ <i>Section V, 2, b: Change “increasing” to “supporting.”</i> ❑ <i>Section V, 2, b, i: The first action step: i. Support the participation of Portland’s diverse communities in the Neighborhood Association network...</i> is a policy statement and belongs in the introductory statement. ❑ <i>Section V, 2, b iv: Concern the expectation to provide resources and assistance that is culturally appropriate sounds like a requirement to provide it even if such services are not requested.</i> ❑ <i>Section V, 2, b v: The language for encouraging Business Association participation is slightly different in the Neighborhood Association and District Coalition sections. Should read the same.</i> ❑ <i>Concern that use of Robert’s Rules of Order as a standard for running neighborhood meetings is a key barrier to participation of underrepresented groups. The solution to more diverse participation is to provide a diverse range of activities that will appeal to various cultural groups.</i> ❑ <i>Seniors should not be included in the list of underrepresented groups. They are not underrepresented in some Neighborhood Associations.</i> ❑ <i>These concepts should be required of Neighborhood Associations as well as District Coalitions.</i> ❑ <i>The City needs to provide financial resources to help Associations with these efforts.</i> 	<p>Three comments</p> <p><i>Section V, 2, b: “This assumes that no neighborhood association in the foreseeable future will have enough diversity. Could this (the word “increasing” in the first sentence) be changed to ‘supporting’?”</i></p> <p><i>Section V, 2, b iv: “I read this as: If assistance is culturally appropriate, resources must be provided to make meetings accessible, regardless of the chance they will be used. Could this phrase be deleted?”</i></p> <p><i>Section V, 2, b v: “This seems to require a position for Business Districts on District Coalition Boards rather than the option that is specified in the Neighborhood Association section. I support the option.”</i></p> <p><i>“I have concerns anytime we break the community into categories. I think just the act of calling out groups of people tends to exaggerate differences between groups and ignore intra-group differences. As a community we do need to respond to the classism, sexism, and racism that exist in our community; and that requires grouping. I think the policy direction that is being maintained is good. I hope the implementation can be done with thoughtfulness and care.</i></p> <p><i>Inclusion in a participatory system is a tricky concept. I do not see community members trying to get involved and being kept out. We are not talking about allowing a diverse community to participate, but creating environments where a diverse community will volunteer and participate. I cannot conceive of this happening within the context of a “Robert’s Rules of Order Monthly Meeting”. I think what we need to reach for is a diverse set of activities that will draw different parts of the community.</i></p> <p><i>Although it is not stated, it is implied that the list of groups in (i.) are underrepresented in the neighborhood system and therefore merit specific mention for special outreach efforts. As written, I have no problem with the list, as implied, I object to including seniors. Seniors are NOT under represented in neighborhood</i></p>

Section	Summary of Comments	Quotes from Comments
Section V, D, 2 Inclusion, Neigh. demographic data	The term “neighborhood association” should be added so that neighborhood demographic data is provided to Associations in addition to the District Coalitions.	One comment <i>“The demographic data and other information cited should be available to both coalitions and neighborhood associations.”</i>
Section V, D, 5 Inclusion, assistance to City agencies	Provide similar technical assistance to City agencies to assist in their efforts to reach diverse population groups.	One comment
Section V, E Grievances	Remove this section entirely, as a rule for grievance procedures is identified in Section VII.	One comment
Section V, F and G No assistance to Business Associations	Remove the reference in this section to “Business District Associations.” Ditto for item G, Information and Referral also. The rationale seemingly that ONI’s role should be limited to its original mission to focus on Neighborhood Associations only.	One comment
Section V Other duties of ONI not carried over from existing Guidelines	Concern that numerous duties of ONI in existing Guidelines are not being carried over in proposed document. Those from the existing document include (summarized): <ul style="list-style-type: none"> ❑ V, A, 5: Facilitating open communication between city bureaus and neighborhood organizations. ❑ V, A, 13: Encouraging City bureaus to increase their outreach and notification efforts. ❑ V, A, 15: Assistance with newly forming neighborhood associations. ❑ V, A, 16: Providing minimum services to unaffiliated Neighborhood Associations. 	One comment

Section	Summary of Comments	Quotes from Comments
Section V ONI should be disbanded	ONI should be disbanded. Funding given directly to Associations, such as on a per person distribution ratio compared to the citywide population.	Three comments <i>“Demand that all current ONI funding immediately go to all legitimate (and legal) Neighborhood Associations, based on a fair and just allocation of the ‘per person’ aspect of the city-wide Portland population.”</i>

Section VI: Business District Associations

Section VI Abiding by same rules as Neighborhood Associations	<p>Business Associations need to operate with the same standards as Neighborhood Associations. It would be unfair if other groups could collect dues, not have to hold open meetings, etc. while Neighborhood Associations are unable to collect dues for example.</p> <p>Also, issue came up if District Coalitions would be relieved of any responsibility to provide services to Business Associations if they do not have to follow the same rules. Currently several Coalitions actively recruit Business Association members to their boards of directors, indirect leadership training to B.A. leaders, insurance coverage for events and banners, coverage of B. A. issues in city funded newsletters, etc.</p> <p>Suggestion: Council must require that all neighborhood-related policy recommendations come to them through one body – the recognized Neighborhood Association. Business people would have to participate in their Neighborhood Associations to have a voice.</p> <p>Note: The Small Business Prosperity Strategy report, produced by the Small Business Advisory Council, staffed by the PDC, includes proposals for funding of Business Association organizational and leadership development similar to the role of District Coalitions. However, funding is not forthcoming</p>	Seven comments <i>“The business associations, neighborhood associations, and the communities without boundaries need to operate with the same standards. It is unfair for the BAs to get money from the City when they can charge dues and neighborhoods can’t.”</i> <i>“Neighborhood Associations and Business Associations sometimes weigh in on the same issues, often taking opposing stances. That means the City ultimately decides which group best represents the interests of the community. In practice, the City Council simply ignores the inequities of how the parties arrived at their positions and, more often than not, puts business claims first.”</i> <i>“Where business involvement was high, their views might even dominate over residential concerns in given organizations. That’s how things work in a democracy. Both sides would have to make a compelling case and build participation.”</i> <i>“What about the issue of Business Associations and services provided to them by the Coalitions? If they are willing to give up all resources and support from the City, does that apply to Coalitions as well? Specifically, insurance coverage for events, banners, etc. What about other things we provide with City money?”</i> <i>“While Neighborhood Associations (NAs) are required to abide</i>
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Section	Summary of Comments	Quotes from Comments
	<p>in the near future. But their work does advocate for any future City funding and support efforts for business associations being through the existing neighborhood support system.</p>	<p><i>by strict public meetings requirements in order to be eligible for city funds and services, Business District Associations (BDAs) may receive certain city services, although no funds, without holding public meetings. Neighborhood Associations are also required to have a Business District member on their board but there is no requirement for BDAs to have NA membership on their boards.”</i></p>

Section	Summary of Comments	Quotes from Comments
<p>Section VI</p> <p>Eliminate this section completely</p>	<p>The Business District Association section should be eliminated entirely. This person has previously articulated that business owners should participate in their Neighborhood Associations for their voices to be heard.</p>	<p>One comment</p> <p><i>“ Businesses are eligible to join neighborhood associations and they should work within their neighborhood’s framework. There is already exist many opportunities available to businesses and a variety of organizations they can join at the local, state and national levels. ONI should not be including businesses in the Standards of regulations. Businesses are already regulated, therefore ONI should be communicating with neighborhoods and their associations more, as it its function.”</i></p>
<p>Section VI, A, 1, a</p> <p>Membership, encourage participation of residents</p>	<p>Business District Associations should be encouraged to do outreach and include membership of residents in their respective neighborhoods. Such language is proposed for the Neighborhood Association section to encourage them to engage business owners in their neighborhoods.</p>	<p>One comment</p> <p><i>“I was surprised that there was not specific language encouraging the Business District Associations to have neighborhood representation on their board/membership, just as the neighborhood associations have been encouraged to have business district members. Perhaps I overlooked this language but if we are trying to encourage collaboration and partnership between neighborhoods and business associations, it seems we would want to make sure this type of language is included.”</i></p>
<p>Sec: VI, A, 1, e</p> <p>Bylaws</p>	<p>Need to clarify who is the “designated entity” in the first sentence. Perhaps simply drop that term and the sentence should still make sense.</p>	<p>One comment</p>
<p>Section VI, A, d</p> <p>Size of Business Associations, 75 too small</p>	<p>Numerous people interpreted our language on the minimal size of a Business Association to assume it meant there had to be a minimum of 75 member businesses. After being told it meant 75 businesses within a geographical boundary they were less alarmed. However, some still felt it should be a lower threshold, such as 25, and the language should be clarified.</p>	<p>5 comment</p>

Section	Summary of Comments	Quotes from Comments
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Dropped Section: Communities Beyond Neighborhood Boundaries		
All organizations need to follow same rules	<p>Any group receiving money for public involvement work – such as diverse groups being considered by the Public Involvement Task Force (PITF) and Diversity and Civic Leadership Committee (DCLC) - need to operate with the same standards as Neighborhood Associations. It would be unfair if other groups could collect dues, not have to hold open meetings, etc. while Neighborhood Associations are unable to collect dues for example.</p> <p>For example: Elders in Action has received City funding for years through ONI to encourage public participation of senior citizens in city and county public policy issues. Should they have to abide by the same rules?</p>	<p>One comment <i>“The business associations, neighborhood associations, and the communities without boundaries need to operate with the same standards. It is unfair for the BAs to get money from the City when they can charge dues and neighborhoods can’t.”</i></p>
All should work through place-based Neigh. Associations	Representatives from diverse organizations need to work with the geographically based Neighborhood Associations making for stronger relationships among diverse groups of people at the local level.	<p>One comment <i>“It is important that all the representatives from these organizations participate together in geographically based organizations. It builds stronger organizations and issues are worked out at a lower level making for (usually) stronger relationships among diverse people.”</i></p>

Section	Summary of Comments	Quotes from Comments
Support for removing this section	Supports removing this section because it encouraged the concept of separate but equal organizations.	<p>One comment</p> <p><i>I support the decision to discontinue the policy of “Communities Beyond Neighborhood Boundaries” in that it perpetuated an atmosphere of separate but equal. I believe it is high time that Neighborhood Associations leave behind a culture of denial and confront directly the ways that people of color are made to feel unwelcome at Neighborhood Association meetings. This has, at times, gone beyond feeling unwelcome and become a hostile environment. The time for talk is over and the time for action is now.”</i></p>

Section VII: Grievance and Appeal Procedures

Section	Summary of Comments	Quotes from Comments
Section VII Spell out 14	Notes any number over eleven should be listed as a digit, not spelled out. i.e. Fourteen days for filing a grievance should be “14”.	One comment
Section VII Supports Grievance section	Thinks its important to have regulations so that Associations can pursue grievances and that ONI needs to be open and honest with all neighborhood organizations.	One comment
Section VII Create reference info explaining grievance rules	Suggestion that ONI needs to provide better reference material to help Neighborhood Associations and individuals navigate through resolution of conflict and/or grievances. Perhaps all these steps should be in a separate document that the Standards simply refer to.	One comment
Section VII, B, 1 & 2 and Section VII, C, 3, a Definitions, What can be grieved	The proposal eliminates the ability to grieve on a number of items and issues, which the public currently has the right to grieve on. One commenter feels this would be a violation of the City’s non-discrimination policies and county/state/ federal laws prohibiting racism. Also, clarify if grievances are limited to violations of just bylaws of Neighborhood Associations “or” Standards, or did we mean “and/or”.	Three comments <i>“The grievance process should not be limited to only violations of bylaws because this intensifies the insular quality of Neighborhood Associations and eliminates perceived “outsiders.” It also works to eliminate those without a thorough understanding of Neighborhood Association bylaws – the insider clique guards its privilege. Such barriers to participation should not be built into the structure of Neighborhood Associations.”</i>
Section VII, C, 1 and VII, D, 1 One-on-one dialogue biased	One-on-one dialogue does not provide for a fair and balanced conflict resolution process if white privilege is taken into account in conflicts between people of color and white people.	One comment <i>“One-on-one dialogue” ignores the very real aspect of white privilege in that it assumes equal power relationships. Consciously or unconsciously the dominant culture guards its access to power and without an “outsider perspective” little real change will occur.”</i>
Section VII, C, 2 and VII, D, 2	Strike the reference to the Neighborhood Mediation Program at Resolutions Northwest and simply indicate that ONI will provide assistance in selecting a mediator.	One comment <i>“ ONI should not be contracting with only one mediation firm. There are many organizations that can provide ONI a list of</i>

Section	Summary of Comments	Quotes from Comments
Mediation, too few options		<i>qualified mediators, therefore ONI should not limit itself and neighborhood associations to only one. “</i>
Section VII, C, 3, d Require open neighborhood grievance hearing	Telling Neighborhood Associations they “may” be open to the public doesn’t really say anything. Might as well drop that sentence unless you intend to require them to be open.	One comment
Section VII, D, 3, e Require Coalition grievance hearings be open to public	The District Coalition’s consideration of a grievance should be required to be open to the public. It is proposed that those meeting may be closed. This person has previously stated Associations and Coalitions should be held accountable to state open meetings laws. Also, asks why Coalition grievance hearings are allowed to be closed when neighborhood meetings and Council meetings have to be open.	One comment <i>“A. All grievance proceedings before a coalition or neighborhood association should be subject to public meetings and public record laws. There should be no distinction. Other than a jury of one’s peers (which are chosen), we do not have secret tribunals that decide grievances. B. If we in fact have a hierarchy, with city counsel at the top and neighborhood associations at the bottom, then why should all of these be public except one?”</i>
Section VII, D, 4 Coalition grievance procedure online	Internal grievance procedures should be outlined in bylaws, posted on the web and on file with ONI.	One comment
Section VII, E, 3 and 4 Final ONI adjudication of grievances and appeals	The Director of ONI should not be the final adjudicator of grievances that are appealed to ONI. Suggested alternatives for final consideration of grievances and appeals that go to ONI: <ul style="list-style-type: none"> <input type="checkbox"/> Citywide Grievance Committee formed from District Coalition board members <input type="checkbox"/> ONI Bureau Advisory Committee <input type="checkbox"/> City Council 	5 comments <i>“The ONI Guidelines wrongly allow (sic) the ONI Director to solely decide all grievances and complaints against the ONI Director and/or against ONI that the Director caused, perpetuated, or is ultimately responsible and accountable to.”</i> <i>“Throughout the Standards’ description of how some grievance and governance questions are resolved when they cannot be resolved at the NA or Coalition levels, a significant amount of</i>

Section	Summary of Comments	Quotes from Comments
	<ul style="list-style-type: none"> ❑ City Commissioner in charge of ONI ❑ City Ombudsman 	<p><i>authority (with no further appeal rights) rests with the ONI Director and staff.”</i></p> <p><i>“(E)(4)(d&e) These steps don’t make sense. ONI has exclusive right to determine whether a grievance against itself is credible and decide resolution accordingly? Shouldn’t this go to the Commissioner in Charge?”</i></p>
<p>Section VII</p> <p>Grievance procedures with City agencies</p>	<p>There needs to be procedures for the resolution of grievances with other City bureaus. Perhaps the Standards should reference to the role of the Ombudsman or other City procedures if they exist.</p>	<p>One comment</p>
<p>Section VII</p> <p>Penalties for wrongdoing</p>	<p>There are no penalties for wrongdoing nor are there any minimum standards required for neighbors, neighborhood associations, Coalitions or ONI employees.</p>	<p>One comment</p>
<p>Open Meetings and Public Records</p> <p>Conflict of Interest</p>	<p>Concern that there is no conflict of interest policy proposed for the Standards. For example: Do members need to disclose that they may have a financial interest that is motivating their advocacy for a specific issue being considered by the group.</p>	<p>One comment</p>

Section	Summary of Comments	Quotes from Comments
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Section VIII: Open Meetings and Public Records

<p>Section VIII, B, 6</p> <p>Definitions: Quorum</p>	<p>Numerous comments conveyed at presentations throughout fall noted that Associations should be able to set quorum at whoever shows up to a meeting or interpreted this proposal as ONI setting a quorum requirement. We've explained the proposal only requires Associations to determine a quorum on their own, not ONI, based on a fixed number or a formula (.i.e. half of all board members). Some have asked if they could set quorum at two people.</p> <p>Second, definition of quorum should not require a "minimum quorum." Instead it should simply require "quorum"</p> <p>Michael O'Malley at 11/8/04 public hearing agreed there seems to be a contradiction in the proposed quorum description.</p>	<p>7 comments</p> <p><i>"We are a volunteer organization with a budget of \$700 from ONI for publicity. It is not enough to guarantee you a certain number of people at any meeting. Neighborhood Associations are based on participation and attraction rather than representation, and we entice/attract well here in East Columbia. We have an inviting newsletter, we serve food, we have door prizes, and we are friendly and lively, we deliver reminder notices the week before and we still get 30+ people out for General Meetings. From what I understand, that is more than many. If you chose to disown us, let us know. Not that it makes sense to do that. Still, you have your reasons and you want accountability. .."</i></p>
<p>Section VIII, D And VIII, G, 5</p> <p>Whether or not to allow electronic meetings</p>	<p>This issue has come up more than any other. An outright ban against electronic meetings ignores the existing practice that numerous Neighborhood Association boards are already making emergency decisions via email. With increasingly short timelines under 30 days for public comment on many issues ranging from Land Use Review notices to Liquor Licenses it is all but impossible for community-based organizations that meet on a 30-day cycle to meet these deadlines for response within their regularly scheduled meeting cycles.</p> <p>Suggestions include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Allowing a request for a position letter to be voted upon at a formal open meeting and allowing the board members to meet electronically to finalize any strategy or contents of a response. 	<p>Nine comments</p> <p><i>"At the TCAP Board meeting on October 26, the TCAP Board unanimously passed a motion requesting that the committee consider a provision for special or emergency meetings to be held by electronic means.</i></p> <p><i>The discussion included consideration of:</i></p> <ul style="list-style-type: none"> • <i>Providing for effective notice of Board and general members as well as the media,</i> • <i>Assuring opportunity for TCAP members to receive related information and to participate (or, in the case of a special Board meeting, to observe) in the discussion and decision-making.</i> • <i>Providing access to information (either distributed electronically or by web reference) in a timely manner that promotes informed discussion and decision-making."</i>

Section	Summary of Comments	Quotes from Comments
	<ul style="list-style-type: none"> ❑ Allow for straw polls to be conducted via email with formal votes taken at subsequent meetings. ❑ Allowing electronic meetings to occur with intent to bring up any topics discussed at a subsequent open board or general meeting for final public vote on that issue. Minutes of the electronic meeting would have to be presented at the open meeting. Actions taken or letters sent as a result of an electronic meeting would need to be noted as being tentative based upon final action at a subsequent meeting. ❑ Allow electronic meetings to fall within existing notice requirements as long as the neighborhood association has set up a free online or email group such as Yahoo that is open to anyone to participate in. The public notice would state the days and hours during which the meeting will take place allowing for any interested individual to monitor or comment during that time period. ❑ Allow for a consent notice to board members for items that don't need discussion can be acted upon outside of regular meetings if no one raised a concern about needing discussion. ❑ Committee should recognize that everyone has access to internet via public libraries, community centers, etc. <p>Still others, have expressed serious concern that allowing any electronic meetings will lead down a slippery slope towards insular cliques deliberating and making decisions on important neighborhood livability issues without broad public discussion.</p>	<p><i>“I hope the committee looks at the issue of email meetings/ voting, and web based discussion boards. On occasion, there is association business that should be taken care of by the board without calling a special meeting. I know there are concerns about notice and having informed discussion prior to taking action. But I hope you take into consideration that there are business issues that don't happen because of the requirements to have a special meeting. So, are you empowering the associations to accomplish their goals, or are you stifling our progress so that we stay within the guidelines?”</i></p> <p><i>“The way I read the ORS is that “electronic” is not defined or quantified, and is explicitly included as a mechanism for holding public meetings (hopefully only in dire circumstances so that the public is not excluded from discussion—although there are no emergency provisions tied to the reference for electronic and telephonic meetings.”</i></p> <p><i>“At our WNA board meeting on Sept. 14th ago we talked about the ONI revised operating guidelines. We were a little alarmed (I don't think that is overstating the reaction) to think that board decisions couldn't be made over e-mail when something arises suddenly and needs a very quick response. We are aware that a number of organizations use this method, maximizing our technology, to facilitate business and communication. Playing phone tag or arranging for everyone to get together for a meeting to make a decision is just not practical, given the alternative. If the concern on the part of those who are floating this change is that some people do not regularly check their e-mail and therefore would not be included in the decision-making process, then this needs to be addressed in a separate fashion, such as having an understanding that those people will be called in addition to getting the e-mail.”</i></p>

Section	Summary of Comments	Quotes from Comments
<p>Section VIII, E and F</p> <p>Concerns about providing notice for meetings</p>	<p>Suggestion made that public notice via the web should be sufficient. Requiring posting of meeting notices in public locations is burdensome.</p> <p>Allow listing of meeting notices in the for-profit neighborhood newspapers to qualify for meeting the notice requirement. Suggestion was for listing mtgs in the Hollywood Star since the NE Coalition of Neighborhoods and some Associations don't have newsletters.</p> <p>Concern that the expectations for providing notice are unreasonable considering the lack of adequate funding to Associations (they receive \$1000 per year for newsletters) to reach all neighbors.</p> <p>Concern about Neighborhood Associations providing notice to land use applicants. Comment incorrectly used the word "must" when the proposed language is "should".</p>	<p>4 comments</p> <p><i>"The public meeting notice. As volunteers who are already Hyper-Involved, posting in physical public locations is a burden to our mission & success. I would hope that we could announce to our members that all public notices will be on our website. And that this would be in compliance with your guidelines."</i></p> <p>"If a NA wishes to consider a land use application at a public meeting, it must notify the applicant. NAs could hold meetings without a quorum and would not be required to notify the applicant (e.g. for strategy discussions). Decisions made by NAs are public decisions."</p>
<p>Section VIII, F</p> <p>Notice for emergency meetings too burdensome</p>	<p>Requirement to post notices and send notices for emergency or special meetings to parties with an interest in the issue is a burden for a volunteer based organization. This issue is related to whether or not email meetings will be allowed for special meetings. Some Associations may simply not have the meetings if they are required to follow so many rules for notice.</p> <p>24 hours is too long to wait for some emergency issues. Need a shorter time period. Ideally take this requirement out.</p>	<p>Three comments</p>
<p>Sec: VIII, G, 2</p> <p>Non-discrimination clause missing categories and</p>	<p>Non-discrimination language of protected classes should be the same as other categories listed in earlier sections. These are based on City civil rights code language.</p> <p>Missing categories are religion, income, political affiliation, and disability. "Creed" is listed, which is not in previous</p>	<p>Two comments</p> <p><i>"You can't discriminate against synagogues or churches because of what is taught Sundays from their pulpits... NA's don't verify doctrine just to use a synagogue or church building."</i></p>

Section	Summary of Comments	Quotes from Comments
meetings at churches	<p>sections.</p> <p>Concern that this could be interpreted simply because someone feels uncomfortable in a church they could grieve they are being discriminated against.</p> <p>Also, one person feels neighborhood meetings should be allowed in church buildings, regardless if they discriminate or not. Also Neighborhood Association meetings should not be allowed on Sundays.</p>	

Section	Summary of Comments	Quotes from Comments
<p>Section VIII, I</p> <p>Authority to stop disruptions too broad</p>	<p>Concern expressed allowing the Chair of a meeting the authority to have anyone removed who disrupts a meeting. Seems arbitrary unless you define criteria for what qualifies as disruption.</p> <p>Suggestion to say: "...may have anyone removed who disrupts a meeting after receiving at least one verbal warning during the same meeting."</p>	<p>Three comments</p>
<p>Section VIII, J</p> <p>Voting</p>	<p>People should not have to be identified or registered as a member living within a neighborhood boundary before they vote at a meeting.</p> <p>Also, do not allow 24-hour voting period. People should be at the meeting in person if they want to vote.</p>	<p>Two comments</p> <p><i>"I don't think voting should be kept open 24 hours for non-attendees. If people aren't present to vote, they won't vote 24 hours later."</i></p>
<p>Sec: VIII, L, 2</p> <p>Time limits for completion of minutes, digital audio records of minutes, and committee mtgs.</p>	<p>A specific deadline for completing and turning in minutes to a District Coalition office should be provided instead of saying "within a reasonable time after the meeting."</p> <p>The concern ties into grievances. How can someone be expected to file a grievance within 14 days if they don't even have access to minutes that might describe an action taken they have a conflict with.</p> <p>Also, one association wants to be able to record digital audio records of their meetings. They feel this would provide a more reliable record of board proceedings including what was said. Do not want limitation that minutes need to be in writing.</p> <p>Also, clarify if requiring minutes taken at "all" meetings includes committee meetings. It should.</p>	<p>Three comments</p>

Section	Summary of Comments	Quotes from Comments
Section VIII Ban videotaping of Meetings	Concern expressed about neighborhood meetings being videotaped. Some felt repeated videotaping of their meetings intimidated people from openly participating and suppressed open deliberation. Others felt it was a right under the spirit of open meetings and freedom of speech that anyone should be allowed to videotape meetings.	One comment
Section VIII Maintain existing requirement to follow state law	Eliminate proposed revisions to create City specific rules on Open Meetings and Public Records for Neighborhood Associations. Maintain existing statute and Guideline requirement that Associations abide by State open meetings and public records law.	One comment <i>“The existing Guidelines refers to the Public Meeting/Public Records Law and includes an addendum of this document. This is a more efficient way to cover this information and we should abide by it.”</i>

Section IX: Review of Office of Neighborhood Involvement Standards

Section IX, A, 7 City agency representation in review	Change to “at least one” representative of city bureaus “that engage in considerable public involvement activities . . .” Increase representation of City agencies in review process and focus on those bureaus with significant public involvement efforts.	One comment
Section IX, B Allow more time for review before final document goes to Council	After public comment and after the committee makes any final changes there needs to be one final public review and time allowed for final comment before language goes to Council. 45 days is recommended. The public review period needs to include distribution to Neighborhood Associations, at least one public meeting, advertisement on both the ONI website and to the ONI notification list, and a schedule for Council consideration.	Two comments