

DATE: January 9, 2013
TO: Board of Commissioners
FROM: Patrick Quinton, Executive Director
SUBJECT: Report Number 13-01
Adopting the Equity Policy of the Portland Development Commission

BOARD ACTION REQUESTED

Adopt Resolution No. 6988

ACTION DESCRIPTION

This action will replace the existing Business and Workforce Equity Policy with a new Equity Policy that 1) expands the Board's equity policies and principles beyond PDC-sponsored construction projects to include other external and internal activities of PDC and 2) delegates to the Executive Director the authority to adopt administrative procedures to implement the broad equity policies of the Board.

This action creates a broad Equity Policy for the agency that is designed to support equitable outcomes in all Portland Development Commission (PDC) investments, projects, and programs; ensure that significant PDC investments in development projects provide opportunities for living-wage construction jobs, career advancement, and business opportunities for historically disadvantaged populations; and establishes internal business practices that increase diversity and social equity within PDC and support partnerships with community stakeholders.

BACKGROUND AND CONTEXT

On February 27, 2008, this Board adopted a Business and Workforce Equity Policy (Resolution 6561), which was subsequently amended by Resolution 6787 on April 28, 2012. This policy required that developers and contractors i) provide contracting opportunities to firms owned by women, minorities and emerging small businesses, and ii) maximize apprenticeship opportunities.

Since the adoption of the current Business and Workforce Equity Policy, PDC has been recognized as a national leader in the utilization of minorities and women in subcontracting, workforce, and apprenticeship. PDC has averaged over the last four years more than 30 percent Minority/Women/Emerging Small Business (MWESB) utilization, more than 20 percent in workforce diversity, and more than 20 percent in apprenticeship utilization. This contracting and workforce diversity strategy has led to more than \$100 million in contracting and payroll dollars to minority firms and workers in the last five years, including more than one million payroll hours for minority workers.

In addition to those specific efforts, the Neighborhood Economic Development Strategy is an equity-based policy and significantly expanded the reach of PDC's equity efforts. PDC time and resources are being prioritized on equity assessments of commercial corridors, types of businesses to be assisted, and targeting of underserved populations and communities. For example, the six Neighborhood Prosperity

Initiative districts were selected based on an analysis of communities of color, lower incomes, and underserved geographies.

The primary differences between the existing Business and Workforce Equity Policy and the proposed new Equity Policy are:

- Expanding the coverage of the policy beyond PDC-sponsored construction projects, to include i) applying an equity lens to other activities, projects and investments of PDC and ii) applying equity principles and increasing diversity awareness internally within PDC. Specifically, the equity policy will involve the application of PDC equity efforts to support cluster firms and traded sector industries, loans and grants, and non-financial investments. Internally these areas include recruitment and retention of employees of color, inclusionary training and practices, the establishment of a PDC Equity Committee, the adoption of a Human Resources Equity Plan, and other related efforts.
- Permitting PDC to expand its definition of “certified firms” to include the use the federal Disadvantaged Business Enterprise certifications by the US Department of Transportation.
- Delegating to the Executive Director the authority to implement specific procedures to implement the Policy, rather than requiring all details of PDC’s equity initiatives to be approved by the Board. This provides PDC with greater flexibility to efficiently make changes in the details of the equity policy as needed. The Executive Director currently intends to implement Administrative Procedures in substantially the form attached hereto as Attachment A, upon adoption of the Board of the new Equity Policy.

COMMUNITY AND PUBLIC BENEFIT

This policy will create and expand community and public benefits beyond the existing policy on construction to PDC resources and investments, internal processes and programs, and will significantly enhance community benefits associated with the construction program and major projects.

- PDC currently has no comprehensive equity policy that applies to the use of resources and investments outside of construction such as the cluster industry programs. PDC will use an equity lens for loans and grants to ensure financial resources address disparities. Each program, major activity or initiative, non-loan/grant investment will now address disparities in access or outcomes. Community benefit agreements will be established for all significant projects.
- This Equity Policy will create a comprehensive approach to internal business practices and will require a Human Resources Equity Plan, including new approaches to recruitment, retention and training; cultural competency and inclusionary practices that support the strategic plan; and annual work plans that are integrated into performance evaluations.
- Under the new Equity Policy, PDC will engage the community on a more comprehensive and inclusionary basis. Multicultural and multilingual considerations will be consistently offered. PDC will work with all communities to address structural disparities and advisory groups will reflect the communities that are to be affected by agency actions and decisions.
- The stakeholder recommendations stemming from the Disparity Study process will create new and better opportunities to achieve the utilization of minority and women contractors, workers, design professionals, and suppliers on projects that receive significant PDC funding. These changes include:
 - PDC will be able to choose to use federal-Disadvantaged Business Enterprise (DBE)-certified firms on all projects in addition to or instead of state-certified MWESB firms.

- All scopes of work shall be bid out and any self-performed work shall require PDC approval.
- Incentives will be provided for joint ventures and mentor-protégé partnerships.
- PDC can require that prime contractors and developers assign an MWESB/DBE coordinator to projects subject to this policy.
- All alternatives to low bid shall be considered.
- Projects receiving PDC assistance will need to submit an insurance and bonding plan that describes how the owner/developer/prime contractor intends to reduce bonding barriers for certified firms.

PUBLIC PARTICIPATION AND FEEDBACK

The elements of the Equity Policy and proposed administrative procedures have been the subject of extensive public and stakeholder discussions over the last two years. As PDC continued to build on the success of the Business and Workforce Equity Policy with respect to the construction elements, Portland had begun a series of public processes on equity that have informed the development of the new PDC Equity Policy. These processes included:

- The PDC North/Northeast Economic Development Initiative, which in addition to the expansion of the Interstate Corridor Urban Renewal Area identified key community benefit elements for the future expansion of the Rose Quarter and Veterans Memorial Coliseum. PDC received significant and extensive stakeholder input from the citizens advisory committee about the need for a comprehensive equity approach that went beyond the footprint of any given construction site and toward a more encompassing approach to community impacts and benefits.
- The development of The Portland Plan created a citywide conversation about equity, in which PDC participated extensively, and the definition of “equity” in the PDC Equity Policy is the same as that in the Portland Plan.
- The Equity Policy draws from the public process used to create the new City Office of Equity; PDC participated in the Creation Committee created by the Mayor and the PDC Equity Policy reflects the consensus of that public process that public agencies in Portland should undertake a comprehensive approach toward achieving equity outcomes in all aspects of their business.
- The PDC 2010-11 Disparity Study, conducted at the same time as the City of Portland’s disparity study, but which is a separate study, received significant and extensive public input before, during and after the release of the findings. PDC assembled a stakeholder advisory committee to provide recommendations based on the study, and those construction-related recommendations are included in the proposed administrative procedures.
- The Oregon Sustainability Center project, although ultimately not approved in its envisioned form, nevertheless created new ways of approaching contracting equity and diversity through the identification of better ways to measure and produce equity in professional services.
- Monthly briefings and discussions have been provided with the board of directors of the National Association of Minority Contractors-Oregon (NAMC) and their input is reflected in the construction elements of the proposed administrative procedures.
- The citywide Neighborhood Economic Development Leadership Team reviewed and recommended the use of the equity lens.

BUDGET AND FINANCIAL INFORMATION

No immediate significant budgetary impacts are anticipated as a result of this policy, considering:

- The current level of the Social Equity budget, which includes the community equity facilitator flexible services contracts, provides funding for multicultural and multilingual communications and engagement and those funding levels are included in the 2013-14 requested budget.
- PDC expects partners in the construction industry to work better and smarter to meet agency goals and requirements, and many of them are already undertaking these efforts on their own initiative.
- The Equity Policy contains all of the current Business and Workforce Equity requirements, goals and thresholds, which remain unchanged.
- Once established, PDC expects that many of these changes will reduce costs in the long run by expanding the capacity of certified firms and streamlining efficiencies on the part of developers and prime contractors.

Potential budget or financial impacts in the future may come from:

- Expanded and enhanced recruitment, retention, and training efforts.
- Expanded expectations for community engagement.

RISK ASSESSMENT

Potential operational risks include:

- Upon adoption, ensuring that the owner/developer/prime contracting community understands PDC's new requirement and expectations; without such an outreach effort, there could be considerable confusion for projects in the near future.
- The proposed Administrative Procedures clarify that the business and workforce equity portion of the policy does not apply to market rate land transactions where PDC Resources are not provided. It is anticipated that there will be such market rate land transactions in the future.
- PDC staff will need to be educated and informed about the new policy, and how to implement it on the operational and project level.
- In some cases the use of contracting methods other than low bid may be legally challenged. If PDC chooses to pursue alternative contracting methods, there may be associated legal costs/risks if a legal challenge is raised.
- Because PDC is moving into areas of equity where few if any public agencies in the country have gone, such as traded sector activities, cluster industries, professional services in a recessionary environment, and non-financial programs and activities, there are very few existing baselines on which to measure this work. The public trust risk is to ensure that PDC successfully communicates meaningful expectations, metrics, opportunities, and limits to our public and private sector partners alike.

ALTERNATIVE ACTIONS

Alternative actions could include:

- Continue the current Business and Workforce Equity Policy.
- Continue the current Business and Workforce Equity Policy with just the Disparity Study recommendations included.
- Not adopt a comprehensive approach to agency-wide equity, but instead continue current efforts on a limited program-by-program basis.
- Not delegate implementing authority to the Executive Director, retaining all policies and procedures related to the Equity Policy as within the exclusive authority of the Board.

Each of these alternatives includes significant policy, outcome, community, and political risk. In the case of significant projects, there is considerable community expectation that PDC will adopt the stakeholder recommendations and assume considerably more control over contracting practices by owners, developers, and prime contractors. While PDC is seeing some limited and preliminary success with recruitments, only a comprehensive agency-wide commitment to diversifying internal business practices will create consistent and long-term results. This Equity Policy will also send the signal that PDC expects as much from its partners as it does from itself; traded sector and cluster industries have clear and extensive equity challenges, and the absence of a strong and explicit PDC commitment to these outcomes limits the agency's ability to expect those outcomes from its partners.

ATTACHMENTS

- A. Draft Equity Administrative Procedures

PORTLAND DEVELOPMENT COMMISSION

Portland, Oregon

REPORT NUMBER 13-01

ATTACHMENT A

**ADOPTING THE EQUITY POLICY OF THE PORTLAND DEVELOPMENT
COMMISSION**

Attachment A – C includes this cover page and contains 9 pages:

- Draft Equity Administrative Procedures

Administrative Procedures

Subject:	Equity	Page:	Page 1 of 8
Effective Date:	TBD		
Approved By:	_____		
	Patrick Quinton, Executive Director		
Sponsor:	Deputy Director, Strategy and Operations		
Owner:	Director, Business and Social Equity		

These administrative procedures (“Administrative Procedures” or “procedures”) are intended to guide the implementation of PDC’s Equity Policy (the “Policy”). The Policy aims to ensure that PDC’s strategic goals, outcomes, programs and initiatives advance social and economic equity by (a) increasing economic opportunity and income for all Portland residents and historically disadvantaged Portlanders; (b) making use of all of PDC’s revitalization and economic development activities to create equitable access to living wage jobs and wealth creation opportunities for Portlanders; and (c) demonstrating PDC’s commitment to and leadership in social equity through internal business practices, robust community partnerships, and accountability measures.

A. **Authorities.** These procedures implement the Equity Policy authorized by PDC Board Resolution #6988.

B. **Definitions.**

1. **“Board”** means the PDC Board of Commissioners.
2. **“Financial Assistance Programs”** means certain PDC business financial assistance programs, including, but not limited to, the Direct Tax Increment Loan, the Economic Development Administration (EDA) Revolving Loan and Real Estate Fund, and other programs the Executive Director may designate.
3. **“Certified Firms”** include Minority/Women/Emerging Small Business (M/W/ESB) firms as certified by the State of Oregon; or a Disadvantaged Business Enterprise (DBE) as certified by the U.S. Department of Transportation.
4. **“DA” or “DDA”** means, respectively, a Development Agreement or a Disposition and Development Agreement.
5. **“Direct Contracting”** includes all professional, supplier, and construction services purchased directly by PDC.
6. **“Enterprise Zone”** is a five-year, 100 percent tax abatement program designed to encourage existing and new industrial firms to make new capital investments in certain designated areas. Participating firms are required to create or retain

quality jobs while maximizing the economic benefits for residents of Portland who are currently earning at or below 80 percent Median Family Income.

7. **“Flexible Service Contract”** is a contract for services that has repetitive requirements on an as-needed basis and may include Personal Services Contracts.
8. **“Hard Construction Cost(s)”** are the costs to build improvements on a property, including all related construction labor and materials and fixed and built-in equipment costs. Costs not directly related to the construction of an improvement, such as overhead, administration, taxes, or other professional services such as architectural or engineering, are not considered Hard Construction Costs.
9. **“Interagency Agreement”** is an agreement between PDC and another government entity, including the City of Portland.
10. **“Intergovernmental Agreement”** is an agreement between PDC and another government entity, including the City of Portland.
11. **“Land Transaction”** is the sale of real property by PDC at any price for the purpose of a private or public project through a DDA. Market-rate land transactions intended to dispose of PDC property (i.e., sale or lease for fair market value) not accompanied by or connected to another PDC objective, PDC Resources, or financial assistance are not subject to the Policy.
12. **“PDC-Owned Construction Contract(s)”** include those in which PDC has a direct contractual relationship with the prime contractor and where PDC is the owner of the project.
13. **“PDC Resource(s)”** include: (i) PDC funds in the form of grants, loans, or payments (for purposes of calculating PDC Resources, any PDC funds used by a single entity for a single project in the form of grants, loans, or payments shall be combined to determine the total amount of PDC Resources); and (ii) the value of a Land Transaction (for purposes of calculating the value of a Land Transaction the value shall be that specified in the DDA).
14. **“PDC Sponsored Project(s)”** include all projects that are privately owned and constructed involving a DA, DDA, loan agreement, grant agreement, agreement involving PDC Resources, or a property conveyance that includes PDC Resources.
15. **“Personal Services Contract”** is a contract for specialized skills, knowledge or unique resources that involve the application of highly technical or scientific expertise or the exercise of professional, artistic, or management discretion or judgment. Such services include, but are not limited to, those performed by architects, engineers, surveyors, attorneys, auditors, other licensed professionals, artists, designers, computer programmers, performers, consultants, and property managers.
16. **“Utilization Goal(s)”** shall mean the percentage goals set for Certified Firms and workforce utilization on contracts and projects subject to the Policy.

17. **“Workforce Goal(s)”** means the goals covering construction trades to utilize People of Color and Women as a percentage of total construction hours worked on a PDC Sponsored Project.
 18. **“Workforce Training and Hiring Program”** refers to the Workforce Training and Hiring Program originally authorized by the Board on December 18, 1997 (Resolution No. 5066)) and reauthorized by the Board on February 27, 2008 (Resolution No. 6561) that pertains to apprentice utilization, as may be amended from time to time.
- C. **Equity Lens for loans and grants.** The Equity Lens (Attachment 1) shall be used to evaluate all PDC loans and grants to ensure financial resources address disparities, advance strategic equity objectives, and do not result in negative consequences for the community. The Equity Lens shall be submitted with all transaction documents before they receive approval to be considered by the Financial Investment Committee. The Equity Lens outcomes shall be evaluated annually by the PDC Equity Council, PDC Leadership Team, and PDC Executive Director for effectiveness and amended as deemed appropriate.
- D. **Equity plan for non-financial investments.** Each program, major activity, non-loan/grant investment, and the processes that govern such activities shall address disparities in access or outcomes and reduce unintended consequences such as displacement within the scope of the activity. An Equity Plan template shall be used to evaluate and improve the impact of these projects, programs, processes, staff activities for each area/activity.
- E. **Business Equity Program.** The Policy aims to ensure that PDC’s work provides professional, supplier, and construction contracting opportunities to Certified Firms. The Policy also aims to encourage the participation of businesses owned by veterans on Direct Contracting, PDC Sponsored Projects and on work utilizing PDC Resources, including Interagency and Intergovernmental Agreements.
1. **Purpose.** The purpose of the Business Equity Program is to ensure that PDC provides professional, supplier, and construction contracting opportunities to Certified Firms and to encourage the participation of businesses owned by veterans on Direct Contracting, PDC Sponsored Projects, and on work utilizing PDC Resources.
 2. **Applicability.** Direct Contracting entities, entities involved in a PDC Sponsored Projects, or entities receiving PDC Resources shall be obligated to comply with the Business Equity Program, upon meeting any one of the following criteria:
 - A PDC Personal Services Contract for any amount;
 - A PDC-Owned Construction Contract greater than \$200,000;
 - A PDC Sponsored Project receiving more than \$200,000 of PDC Resources to finance a project with Hard Construction Costs greater than \$200,000; or

- An Intergovernmental or Interagency Agreement with Hard Construction Costs greater than \$200,000 and more than \$100,000 in PDC Resources, whether performed by PDC or another agency. The Executive Director or the Executive Director's designee may defer to another agency's program if its program is similar to PDC's program. If PDC defers to another agency's program, utilization reports shall be provided to PDC by the other agency on a monthly basis.
3. **Utilization Goals for Certified Firms.** The following Utilization Goals are established upon the initial adoption of the Policy. The Executive Director is responsible thereafter for annually reviewing the Utilization Goals and is authorized to modify them, based on the results of such annual analysis:
- Personal Services Contracts on PDC-Sponsored and PDC-owned Projects: 20% of the payments made under such contracts;
 - PDC-Owned Construction Contracts: 20% of Hard Construction Costs;
 - PDC Sponsored Projects: 20% of Hard Construction Costs for residential low-rise construction and 20% of Hard Construction Costs for commercial high-rise construction, as calculated by an analysis of availability and capacity of Certified Firms for the specific project;
 - Interagency and Intergovernmental Agreements; and
 - Flexible Service Contracts
 - 30% of the total number of contracts in any fiscal year; and
 - 25% of the payments made under such contracts.
4. **Notice and Timing.** In an instance where a party receives PDC Resources after it has expended funds on a project, started construction, or taken other action that would impair its ability to comply with the Business Equity Program, PDC (the project manager, with assistance from the M/W/ESB Coordinator) may negotiate a Certified Firm participation level that is reasonable and may provide technical assistance to achieve that negotiated Utilization Goal.
5. **Prompt Payment.** For projects subject to the Policy, a contractor and/or developer shall pay all subcontractors and suppliers within ten (10) calendar days after receiving payment from PDC on all PDC-Owned Construction Projects and PDC Sponsored Projects.
6. **Self-Performed Work.** For projects subject to the Policy, all scopes of work shall be bid out, and approval in writing is required from PDC for any self-performed work on a project subject to the Policy.
7. **Joint Ventures.** For projects not subject to low bid, PDC shall provide incentives for joint ventures and mentor-protégé partnerships.

8. **Coordinator.** At its discretion, PDC may require that the owner/developer/prime contractor assign an M/W/ESB/DBE coordinator to projects subject to the Policy.
 9. **Alternatives to Low Bid.** Alternatives to low bid shall be considered on projects subject to the Policy.
 10. **PDC-Owned Contracts.** PDC shall develop an annual strategy to close disparities identified in the 2011 disparity study.
 11. **Five-Year Requirement.** On projects subject to the Policy, all subcontractors shall be a signatory to a State of Oregon Bureau of Labor and Industries (BOLI) approved apprenticeship training program that has been in existence for five years or longer and has produced graduates. The Executive Director, in his/her sole discretion, shall approve any exceptions.
 12. **Remediation and Demolition.** All environmental remediation and demolition work, to the extent that such work equals or exceeds \$50,000 in PDC Resources, whether such environmental remediation and demolition work is undertaken in connection with a development agreement, in anticipation of a development agreement, or at PDC's initiative. The application of the PDC Wage Rate shall only apply to such environmental remediation and demolition work subject to this Policy.
 13. **Effective Date of the Policy.** The effective date for applying the policy to current projects is the signing of the Memorandum of Understanding (MOU) between PDC and the developer. If there is no MOU, the effective date shall be the date of the DDA, DA, or other transactional documents between PDC and the developer. At the signing of an MOU between PDC and the developer, a preliminary determination shall be made by PDC of the applicability of the policy. At the signing of a DDA, DA, or other transactional documents between PDC and the developer, a final determination shall be made by PDC of the applicability of the policy. PDC Wage Rates shall lock in at the signing of the prime construction contract with the developer.
 14. **Ineligibility.** Contractors that are on the BOLI list of ineligibles cannot participate in PDC construction projects.
 15. **Insurance and Bonding.** Projects receiving PDC Resources shall include an insurance and bonding plan that describes how the owner/developer/prime contractor intends to reduce insurance and bonding barriers for Certified Firms.
- F. **Workforce Equity Program.** Maximize apprenticeship opportunities in the construction trades and ensure employment opportunities for People of Color and Women and encourage the employment of people with disabilities and veterans on Direct Contracting, Land Transactions and on work utilizing PDC Resources.

1. **Applicability.** Direct Contracting entities, entities entering into a DA or DDA, or entities receiving PDC Resources shall be obligated to comply with the Workforce Equity Program upon meeting any one of the following criteria:

- a. On a PDC-Owned Construction Contract or an Intergovernmental Agreement greater than \$200,000, the Workforce Equity Program shall apply to the prime contract and any subcontract greater than \$100,000.

The Executive Director or designee may defer to another agency's workforce program if its program is similar to PDC's program. If PDC defers to another agency's program, utilization reports shall be provided to PDC by the other agency on a monthly basis.

- b. On a PDC Sponsored Project, the Workforce Equity Program shall apply if the project receives \$300,000 or more of PDC Resources to finance a project with a Hard Construction Cost greater than \$1,000,000 and shall apply to the prime contract and any subcontract greater than \$100,000.

2. **Requirements.** Projects subject to the Workforce Equity Program shall:

- a. Comply with the Workforce Training and Hiring Program to, among other things, ensure that a minimum of 20% of labor hours in each apprenticeable trade performed by the contractor and subcontractors are worked by state-registered apprentices, as such requirements are further described therein; and
- b. Work toward achieving the Workforce Goals phased over a ten-year period as outlined in the table below. The percentage of hours set forth below includes both apprenticeship hours and journey level hours:

Workforce Goals Fiscal Year	2008/2009	2009/2010	2010/2011	2011/2012	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018
Female	6%	7%	8%	9%	10%	11%	12%	13%	14%	15%
People of Color	25.5%	26%	26.5%	27%	27.5%	28%	28.5%	29%	29.5%	30%

- c. Make all reasonable and necessary efforts to employ a workforce that reflects the diversity of the City of Portland, including recruitment of a diverse workforce through the unions, the apprenticeship programs and other community resources.
- d. Projects subject to the Workforce Equity Program are encouraged to employ veterans and people with disabilities.
3. **Notice and Timing.** In an instance where a party receive PDC Resources after it has expended funds on a project, started construction, or taken other action that would impair its ability to comply with the Workforce Equity Program, PDC, through a Project Manager and with assistance from the M/W/ESB Coordinator,

may negotiate a level of compliance that is reasonable and may provide technical assistance to achieve that negotiated Workforce Goal.

4. **Equal Employment Opportunity Certification.** Contractors and subcontractors subject to the Policy must be certified by the City of Portland as an Equal Employment Opportunity Employer.
 5. **Damages.** The procedural requirements of the Policy are contractual obligations. In the event that PDC determines, in its sole and absolute discretion, that the procedural requirements of the Policy have not been complied with, then PDC's finding may result in one or more of the following:
 - a. A finding of breach of contract with a notice to cure deficient performance;
 - b. Disqualification of the developer, contractor, or subcontractor to receive future PDC Resources or bid on future PDC solicitations;
 - c. A claim for liquidated damages;
 - d. Withholding of progress payments; and/or
 - e. Any additional remedies included within the contract.
 6. **Exemptions.** These procedures shall not apply to projects receiving Enterprise Zone designation or to PDC Resources derived from Financial Assistance Programs that are intended to be used for working capital or property acquisition.
- G. **Community benefits agreements.** Projects receiving substantial investments through PDC shall be evaluated for community benefits in addition to those related to the project's pre-development and construction work and encouraged/required to enter into a community benefits agreement to address issues of access for local residents to long-term employment opportunities, supply-chain opportunities for local businesses and publically-accessible amenities.
- H. **Human Resources Equity Plan.** PDC will research and document benchmarks and best practices of like organizations with successful internal/staff-focused diversity and equity programs. The Human Resources division will subsequently develop, adopt and implement an Equity Plan with an annual work plan to address education, training, and strategies to retain, promote and recruit diverse staff reflective of the local community (the "HR Equity Plan"). Components of the HR Equity Plan will include:
1. Recruitment of staff diverse in its representation.
 - a. PDC will report statistics and adhere to an Affirmative Action Plan (AAP) that benchmarks local market diversity.
 - b. PDC will work with community equity partners to leverage diverse opportunities for recruitment and job postings.
 - c. PDC will aspire to exceed the goals outlined in the AAP to be an employer of choice in inclusiveness and equity within the broad population.

2. Retention of staff diverse in its representation.
 - a. Managers will be trained in cultural competency and awareness of institutional and unintentional bias that impacts organizational effectiveness.
 - b. Performance evaluations will include accountabilities for cultural competency.
 - c. Policies, practices, and procedures will be screened for institutional racism.
 - d. PDC will sponsor internal and external programs and educational opportunities to promote equity and inclusivity for all employees.
 3. Utilization of the City of Portland's Minority Evaluator Program for leadership position recruitments and others.
 4. Career advancement/mentorships with the goal of achieving staff and managers diverse in representation.
 - a. PDC will collaborate with individual employees to create development plans for all interested employees, including employees of color, in order to grow their careers within PDC, and will develop opportunities and support for employees of color that will meet their particular goals.
 - b. PDC will promote mentorship opportunities for all interested employees, including employees of color, within PDC as part of individual development plans.
 5. PDC will consider all candidates who meet the minimum qualifications for all open positions, while encouraging candidates of color to apply and seek growth opportunities.
- I. **Community engagement.** PDC shall engage the community in ways that allow for meaningful public involvement of people impacted by projects, programs and processes. Advisory groups shall reflect the communities affected by PDC activities. Multicultural and multilingual considerations shall be consistently made available as needed. PDC will work closely with all communities, particularly historically disadvantaged communities, to explicitly address structural disparities, create pathways to prosperity, and determine the process for community involvement and governance.
- J. **Accountability & Governance.** Cultural competency and inclusionary practices that support the strategic plan and annual work plans will be integrated into the mid-year and annual performance evaluations. The PDC Equity Council (or other body as designated by the Executive Director) will oversee internal equity practices, monitor organizational progress, increase cultural competency training, and make recommendations for performance improvement.