



**CITY OF MILWAUKIE, OR — EQUITY AND INCLUSION ASSESSMENT AND DEI PLAN
Draft Public Report**

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PUBLIC REPORT — Introduction

The City of Milwaukie has made equity, inclusion and justice a priority in how it serves the public and operates as an employer. The City engaged Keen Independent Research in summer 2022 to develop a Diversity, Equity and Inclusion (DEI) Plan that will advance these efforts and ensure they are embedded throughout City operations.

Research Approach

This study concluded in July 2023, using information from:

- Analysis of the City’s policies, procedures and budgets;
- Examination of City workforce and hiring;
- Interviews with City staff;
- Review of prior employee and community surveys; and
- Virtual workshops with employees and the public.

Keen Independent obtained input from nearly 250 participants through these efforts (not counting surveys Milwaukie previously administered).

The City provided data, contact information for interviewees and documentation of policies, procedures and budgets for analysis.

Organization of the Report

This report is organized in four parts:

1. Key definitions.
2. Why diversity, equity and inclusion?
3. Summary of findings.
4. DEI Plan recommendations.

Based on this information, Keen Independent recommends next steps the City could take to promote equity, diversity equity, inclusion and justice in its workplace and when providing services to the community.

Some measures may require more time or effort to accomplish than others. They should be incorporated into operational plans, employee training and coaching, budgets and performance indicators.

Key Terms

To facilitate consistent understanding, Keen Independent provides definitions for key terms and language used in this report.

Diversity. Variation of a group based on traits such as race and ethnicity, gender identity or expression, age or life stage, nationality, veteran status, language, religious affiliation, sexual orientation, disability, lived experience, income, neighborhood, communication style and more. Diversity includes all the ways in which people differ.

Equity. Acknowledging and addressing historic and current disparities experienced by City of Milwaukie employees, local residents, businesses and neighborhoods. Determinants of equity include the social, economic, geographic, political, physical environment and conditions in which people live.

Inclusion. The act of creating an environment and workplace where all individuals and groups are valued, respected and supported as they contribute to the mission and success of an organization.

Belonging. A sense of cohesion, engagement and respect, achieved through efforts by an organization to be inclusive and open to all employees, customers and community members.

Inequities. Differences that disadvantage an individual or group in favor of another.

Disadvantaged. Being in a less powerful position in a community or group.

Language access services. Services that agencies use to help communicate with people who do not speak, understand, read or write fluently in the area's most common language.



Racially minoritized. A group that coexists with others in society, yet is subordinate to larger, more powerful groups.

This report primarily uses definitions of racially minoritized groups used by the federal government and in U.S. Census Bureau data and other information. However, racially minoritized groups and racial identity change over time and are often context specific. Broad race or ethnicity categories also ignore diversity within groups. (Only basic demographic data were available for this study.)

Stakeholders. Individuals or groups who are impacted by, have expertise in or are concerned with a particular issue.

Underserved. People, places and communities that have not had or do not have equitable resources or access to services, in general. These groups may have disparities in both services and outcomes.

Why DEI?

As diversity, equity and inclusion (DEI) have become prominent social topics, researchers have worked hard to answer the question, “Why should an organization utilize limited resources to address these topics?” This section provides just a few responses to this question, drawing on research on private and public sector organizations.

Internal Benefits of DEI

Benefits of DEI to employers include the following:

Producing higher quality work. Workplaces that emphasize DEI experience an elevation of business performance by 31 percent on average.¹

Improved organizational decision-making. Employees with diverse backgrounds bring diverse thinking, communication and decision-making skills. This improves organization-wide decision-making, in part because diverse colleagues tend to consider a broader range of possibilities than more homogenous organizations.²

Increased innovation. Research has found a positive relationship between diversity among an organization’s managers and innovative practices, which has improved performance.³

Increased profitability. Private sector organizations with DEI programs have a 35 percent greater likelihood for above-average financial returns than those organizations without.⁴ Those that focus on honing an inclusive culture are twice as likely to meet or exceed fiscal targets.⁵

Greater competitiveness. Diversity initiatives strengthen long-term market competitiveness of companies while simultaneously producing short- and medium-term performance improvements.⁶

Increased team satisfaction. Diverse, inclusive and equitable workplaces build trust among workers, particularly those of minority racial, gender, sex and ability groups. They also shift perceptions of cultural differences towards being a resource for new approaches, ideas, learning and more. These, and many other facets of diversity, result in workforces that are more satisfied than non-diverse workforces.⁷

¹ McKinsey & Company. (2020). “Diversity Wins: How Inclusion Matters.” Retrieved September 2, 2021, from <https://www.mckinsey.com/featured-insights/diversity-and-inclusion/diversity-wins-how-inclusion-matters>

² Ely, R. & Thomas, D. (2020). “Getting Serious About Diversity.” *Harvard Business Review*. Retrieved July 1, 2021, from <https://hbr.org/2020/11/getting-serious-about-diversity-enough-already-with-the-business-case>

³ Shufeldt, J. (2021). “The Importance of DEI.” LinkedIn. Retrieved September 2, 2021, from https://www.linkedin.com/pulse/importance-dei-john-shufeldt-md-jd-mba-facep?trk=articles_directory

⁴ McKinsey & Company. (2020). “Diversity Wins: How Inclusion Matters.” Retrieved September 2, 2021, from <https://www.mckinsey.com/featured-insights/diversity-and-inclusion/diversity-wins-how-inclusion-matters>

⁵ Shufeldt, J. (2021). “The Importance of DEI.” LinkedIn. Retrieved September 2, 2021, from https://www.linkedin.com/pulse/importance-dei-john-shufeldt-md-jd-mba-facep?trk=articles_directory

⁶ Employment and Social Affairs. (2003). “The Costs and Benefits of Diversity.” *European Commission*.

⁷ Ely, R. & Thomas, D. (2020). “Getting Serious About Diversity.” *Harvard Business Review*. Retrieved July 1, 2021, from <https://hbr.org/2020/11/getting-serious-about-diversity-enough-already-with-the-business-case>

Why DEI?

External Benefits of DEI

External benefits include the following.

Increased social equity. DEI initiatives advance equity at a social level, as workers bring equity knowledge to spaces outside of the organization. This ultimately shapes non-workspaces in positive ways.⁸

Local economic benefits. Research conducted by Keen Independent across the country indicates that race and gender discrimination may have reduced the number of businesses owned by people of color and by women by 10 to 50 percent, depending on the industry and community. Lower rates of business startup and higher rates of business failure reduce the economic capacity of communities and the vibrancy of local institutions.⁹ Race and gender discrimination negatively impacts employment opportunities as well. Keen Independent has documented such evidence across Oregon in our 2022 Oregon Department of Transportation Disparity Study. Addressing these barriers results in a community realizing more of its economic potential, benefiting other local businesses and institutions as more money circulates through the local economy.

Improved services. DEI efforts foster community engagement and generate better information on local priorities. These insights allow a local government to tailor its services and practices in ways that better suit needs of local residents and businesses. Ultimately, DEI initiatives

lead to improved service delivery and efficient use of available resources.

Community connections and trust. Equity efforts by a local government communicate to members of disadvantaged groups an openness for community-agency connections and trust. Equity work tends to increase an organization's transparency as well (through sharing of information and outreach interactions) and is viewed by diverse individuals as "investments" in their communities.¹⁰

Crafting opportunities for diverse partnerships. DEI efforts can attract more community organization and business partners for a local government. Such partnerships lead to benefits such as greater diversity in recruitment, as more people see equity-focused agencies as potential workplaces.¹¹

Usefulness of Communicating Benefits

Communicating DEI benefits to leaders, employees and the public served by the City's programs, services and events is a crucial step in the DEI process and is advantageous to a public entity like the City of Milwaukie. Doing so can promote stakeholder buy-in and support — particularly among potential skeptics — as well as provide a "business case" for equity work that may be important to stakeholders. When producing communications materials for DEI strategies, public agencies should include these benefits.

⁸ Shufeldt, J. (2021). "The Importance of DEI." LinkedIn. Retrieved September 2, 2021, from https://www.linkedin.com/pulse/importance-dei-john-shufeldt-md-jd-mba-facep?trk=articles_directory

⁹ Keen Independent Research (2022). *2022 Oregon Department of Transportation Disparity Study*. https://www.oregon.gov/odot/Business/OCR/Documents/KeenIndependent_2022ODOTDisparityStudy_DraftReport_05192022.pdf

¹⁰ Estrada, S. (2021, January 13). "Workplace D&I in 2021 Will Keep External Community in Mind." HR Drive. Retrieved April 20, 2022, from <https://www.hrdrive.com/news/workplace-di-in-2021-will-keep-external-community-in-mind/593297/>

¹¹ Ibid.

Summary of Findings — Context

Keen Independent analyzed the City of Milwaukie’s current plans and activities through a DEI lens to provide context for review of its DEI efforts. Beginning the assignment with this assessment allowed the study team to gain insight into how the City has thought about DEI and incorporated it into its operations.

Comprehensive Plan

The City of Milwaukie Comprehensive Plan was adopted in 2020 and outlines the vision for the city through 2040. The plan was created using input from more than 600 members of the community and has several sections relevant to DEI. Many sections are prefaced with language acknowledging systemic inequities that the City seeks to address through the Plan. The goals outlined in each section often address DEI-relevant issues, such as accessibility, inclusivity, environmental justice and transparency in decision-making.

Budgeting

The Budget Committee, which consists of five members of the City Council and five citizen appointees (all with equal votes), convenes as directed by the Council and reviews the City Manager’s proposed biennial budget. After review, the Budget Committee makes recommendations to the City Council for adoption. Members of the Budget Committee serve four-year terms. The June 2022–July 2024 budget reflects the goals and policies outlined in the Comprehensive Plan, which largely center on equity.

DEI Training

Between 2020 and 2022, City of Milwaukie managers and staff have undergone several DEI training sessions on topics including racial identity, systemic inequities and unconscious bias, among others.

Policing

Comprised of 33 sworn officers and about six support staff, the Milwaukie Police Department (MPD) has dozens of policy and procedure documents that guide its practices. MPD training documents explicitly define equity and marginalization. Training activities include several that build relationships with the community in 2020 and 2021, employees had four DEI training sessions.

Summary

The City’s current plans and activities reflect a commitment to DEI in all facets of the City’s operations. In the future, the City may benefit from including more specific actions to support its Comprehensive Plan goals, a more diverse Budget Committee, follow-up actions to DEI training and continuing to collect of staff perceptions concerning DEI-relevant topics.

Summary of Findings — Employment

Keen Independent examined different aspects of employment at the City through both qualitative and quantitative means.

Snapshot of Employees of Color and Women at the City

People of color were 7 percent of employees at the City in 2017, not including temporary employees or elected officials. About two-thirds of employees were women.

Keen Independent examined changes in City employment, including hires and separations, from January 2017 to July 2022. The percentage of workers who are African American, Native Hawaiian and Hispanic American increased.

There was a decline in the relative share of workers who are Asian American and women. Figure 1 provides these results.

Location of City workers. City employee data show that 98 percent of active employees live in either Clackamas County (76%) or Multnomah County (17%). The Clackamas County and Multnomah County area is the labor market area for the workforce availability analysis.

1. City workers, by race, ethnicity and gender, 2017 and 2022.

| | 2017 | 2022 |
|---|----------------|----------------|
| Race/ethnicity | | |
| African American | 0.0 % | 2.0 % |
| Asian American | 2.9 | 1.3 |
| American Indian and Alaska Native | 0.0 | 0.0 |
| Native Hawaiian or other Pacific Islander | 0.0 | 0.7 |
| Hispanic American | 3.7 | 4.0 |
| Total people of color | 6.6 % | 8.1 % |
| Non-Hispanic white | 93.4 | 92.0 |
| Total | 100.0 % | 100.0 % |
| Gender | | |
| Women | 46.0 % | 41.6 % |
| Men | 54.0 | 58.4 |
| Total | 100.0 % | 100.0 % |

Source: Keen Independent Research from City of Milwaukie employee data. Keen Independent Research from 2017–2021 ACS Public Use Microdata samples. The 2017–2021 ACS raw data extract was obtained through the IPUMS program of the MN Population Center: <http://usa.ipums.org/usa/>.

Summary of Findings — Employment

Hiring and Retention

To assess DEI in the City’s hiring and retention, Keen Independent reviewed existing policies and procedures related to hiring, examined hiring and current employment data for disparities, and conducted a virtual workshop in which City employees were invited to share their feedback on the workplace.

The City has several policies in place that pertain to DEI topics. These include disability accommodations, equal employment opportunities, anti-harassment, bullying and appropriate workplace conduct. Additionally, the City has a process for fielding complaints and concerns raised by employees.

Hiring policies and procedures. When hiring for an open position, the City develops a job description, posts it online and internally manages the application process. Once applications are received, those materials are sent directly to hiring managers within City departments.

The City has standardized the hiring process by having HR staff screen candidates for minimum qualifications to better ensure an equitable hiring process from start to finish.

Disparities in hiring. Keen Independent compared the diversity of City hires to what might be expected given the composition of the available workforce in the region. By dividing the share of hires in a particular racial or gender group with the availability benchmarks for the region, Keen Independent computed disparity indices. A disparity index of “100” means perfect equity in hiring (i.e., the same percentage of available workers in a given group were hired as would be expected) whereas an index of 0 means perfect inequity (no workers in that group were hired).

Figure 2 displays these results. The disparity index of 69 for people of color indicates a substantial disparity between hires of workers of color and the availability of workers of color for City positions. (Courts have ruled that disparity indices below 80 can be deemed substantial and warrant particular attention.)

2. Disparity indices for hiring between 2017 and 2022

| | (a) Hires | (b) Percent of hires | (c) Availability | (d) Disparity index (b/c) |
|-----------------------|--------------|----------------------------|---------------------|------------------------------------|
| Race/ethnicity | | | | |
| People of color | 19 | 17.4 % | 25.4 % | 69 |
| Non-Hispanic white | 90 | 82.6 | 74.6 | 111 |
| Gender | | | | |
| Women | 45 | 41.3 % | 42.6 % | 97 |
| Men | 64 | 58.7 | 57.4 | 102 |

Note: A disparity index of under 80 is considered a substantial disparity.

Source: Keen Independent Research from 2023 City of Milwaukie EEO-4 employee data. Keen Independent Research from 2017–2021 ACS Public Use Microdata samples. The 2017–2021 ACS raw data extract was obtained through the IPUMS program of the MN Population Center: <http://usa.ipums.org/usa/>.

Summary of Findings — Employment

Disparities in current employment. The current diversity of workers at the City is the product of many years of hiring and efforts to retain employees. Any inequities in hiring or retaining employees can lead to disparities in the relative number of workers of color and women in City jobs. Keen Independent compared current representation of people of color and women with the availability of those groups of workers for each major job group at the City (results displayed in Figure 3).

Substantial disparities were identified for people of color in all job groups and for women in the protective service workers and skilled craft workers job groups.

Internal leadership was provided a breakdown by job groups. Some departments are doing a better job increasing diversity of their workforce than others. It is a goal of the City Manager and HR Director to improve across the board.

Additional qualitative engagement that informed Keen Independent’s recommendations was conducted with City of Milwaukie staff. Results have been shared with internal stakeholders.

3. Disparity indices for City employees, 2023

| | (a) Employees | (b) Percent of employees | (c) Availability | (d) Disparity index (b/c) |
|-----------------------|------------------|--------------------------------|---------------------|------------------------------------|
| Race/ethnicity | | | | |
| People of color | 12 | 8.1 % | 24.0 % | 34 |
| Non-Hispanic white | 137 | 91.9 | 76.0 | 121 |
| Gender | | | | |
| Women | 62 | 41.6 % | 40.1 % | 104 |
| Men | 87 | 58.4 | 59.9 | 97 |

Note: A disparity index of under 80 is considered a substantial disparity.

Source: Keen Independent Research from 2023 City of Milwaukie EEO-4 employee data.
Keen Independent Research from 2017–2021 ACS Public Use Microdata samples.
The 2017–2021 ACS raw data extract was obtained through the IPUMS program of the MN Population Center: <http://usa.ipums.org/usa/>.

Summary of Findings — Procurement

Keen Independent also examined equity in City contracting practices. The City has created public contracting rules that are compliant with Oregon Revised Statute (ORS) 279. Keen Independent assessed the policies and procedures for City procurement and conducted a virtual workshop with past, current and potential contractors and vendors.

Perceptions of DEI in Procurement

Business owners and managers participating in the procurement virtual workshop were asked to give their impressions of diversity, equity and inclusion in the City's procurement processes. A few comments praised the City for its inclusive processes and several made suggestions for future improvements, including direct outreach to minority-owned, women-owned, service-disabled veteran-owned businesses, and emerging small businesses. Examples of comments are shown below.

It is important to give the smaller companies a chance, a size of a company doesn't always mean success.

Vice President of Sales for a certified ESB

Reach out to firms in the COBID directory that have not submitted in the past and notify them of upcoming on-call RFQs.

Vice President of Sales for a certified ESB

Ensure that they are involved in local minority and inclusion groups and continue to advertise through the DJC, SWCA, OregonBuys, etc.

Representative from a large corporation

We really liked the challenge in the process for us to be inclusive with contract language. It definitely helped us see procurement in a progressive way.

Senior Account Executive for a privately owned business

Bid Management System

Currently, the City's uses a Bid Management System with some limitations to its functionality. For example:

- The system does not allow for screening of notices so that only those firms that provide that product or service are notified of a procurement.
- Vendors are not able to indicate that they are COBID-certified nor can they select an industry into which their goods and services fall.
- The City appears to have no way to generate and export reports containing information in the system, such as aggregated contact information for bidders.
- There is no capability in the system to report on diverse business participation.

A few comments from virtual workshop participants reflected some of the difficulties with the system.

I wish there was a way to filter out non-relevant projects, but that's not super important. It just means that I don't read the bid notices as carefully as I should, b/c they are usually not relevant to my work.

White female owner of a certified Women Business Enterprise (WBE)

We receive notifications that are not relevant to us. It would be nice to be able to narrow down those that we receive.

Coordinator for a certified Women Business Enterprise (WBE)

Summary of Findings — Services to the Community

Keen Independent interviewed City staff and collected feedback from the public to inform our assessment of DEI in the services the City provides to the community.

Fees and Utility Rates

The City periodically assesses its fee structure and utility rates to ensure that they are consistent with goals and promote equity.

Fees. Every budget cycle, the City adopts a consolidated fee schedule. Fees are typically set to reflect the actual cost of providing the service.

Utility rates. Every two years, the City evaluates the revenue requirement for each utility and makes a plan to adjust the rates such that they can continue operating it sustainably. In general, the City minimizes the extent to which one group of customers is subsidizing another group.

The 2019 Utility Financial Services study on the City's utility rates suggested that the City was undercharging large customers and a recommendation was made to modify fixed customer charges. The City Council indicated that creating a rate structure that provides a discount to low-income and low-use customers should be prioritized.

Public input. The Citizens Utility Advisory Board (CUAB), a five-member board appointed by the City Council, is involved in review of fees set for City services. The City solicits additional feedback from the public on its fees and rates through a variety of sources, including:

- Email lists;
- Neighborhood District Associations;
- Social media; and
- The Milwaukie Pilot.

Other Service Delivery Suggestions

Public virtual workshop participants were asked for their suggestions regarding what, if anything, the City can do to more equitably serve residents. A few comments specifically mentioned adding sidewalks. Others mentioned wanting more affordable housing options and fewer fees and restrictions on homeowners on what they may include on their property. Some comments mentioned wanting the City to be more responsive or accessible to residents. A few comments mentioned the role of the police and one commented that training in conflict de-escalation would help serve residents more equitably.

Add more sidewalks in areas that have a high number of families.

Recent (<5 years) Black female Milwaukie resident

Institute an independent equity, environmental and sustainability review for all policy proposals and applications for development or contracting initiatives.

Longtime (11+ years) Milwaukie resident

Pay attention to other cultures and give the police training in respect. Not looking for reasons to use a gun.

Longtime (11+ years) female Milwaukie resident

[T]he majority of taxpayers just want you to answer the phone and return a call.

Longtime (11+ years) Asian male Milwaukie resident

Summary of Findings — Services to the Community

Events

Most participants in the public virtual workshop indicated that they perceived City-sponsored events to be of high quality. Many provided suggestions for future events, which included:

- Concerts;
- Cultural celebrations;
- Multigenerational events; and
- Parades.

When asked to reflect on how the City could host more diverse and inclusive events, virtual workshop participants provided comments indicating that the City may consider expanding the types of events it hosts and communicating the details of these events so they are highly visible to the community. Several participants specifically mentioned Milwaukie Daze as an inclusive community event they enjoyed.

6. Participants in the Umbrella Parade



Source: City of Milwaukie.

Hold cultural events during Black History Month, Hispanic heritage month, etc.

Recent (<5 years) Black male Milwaukie resident

I don't know but you don't need to just do things to make black people or other minorities feel more welcome. It reads as pandering. The community has more black residents now which is great but just put on events with more diverse members and volunteers vs. hosting events specifically for a racial group. And I say this as a black resident.

Recent (<5 years) Black female Milwaukie resident

It's not so much that events are not diverse or inclusive, but they are not the most exciting events people want to attend. You need to get the word out when you have some major event. Maybe a banner across McLoughlin or attached to the overpass. Attention to main streets in the different regions of the cities. Right now I have to be assertive to find out about events - they are not in my face.

Longtime (5+ years) white female Milwaukie resident

Diversity should extend to various interests, hobbies, beliefs, values and cultures. This is why the Umbrella Parade works well, the focus is not limited to one type of group, which makes it open to everyone and allows for creative expression.

Longtime (11+ years) female Milwaukie resident

Ensure that cultural events of all different types are on the calendar. Ensure that people who represent that culture are part of the planning of each of these events ensure that funding for the various events is equitably dispersed across the diverse types.

Longtime (11+ years) female Milwaukie resident

Summary of Findings — Public engagement and communication

The City of Milwaukie routinely employs robust public engagement processes that supports its decision-making.

Methods of Public Engagement

As summarized in prior sections, public engagement has informed City activities such as preparing the Comprehensive Plan and setting fees.

Methods of public engagement the City has used include:

- Citizen advisory boards and committees;
- Community surveys;
- Events surveys;
- Neighborhood District Associations;
- Social media.

In interviews, some City officials reported that members of the public often do not take advantage of opportunities to provide input regarding City plans. Keen Independent’s assessment indicates that the City could strengthen its community engagement efforts by more frequently and directly asking for public input, particularly to those who do not often participate in civic discourse. The City also has several methods of fielding complaints and concerns raised by community members.

Communication of DEI Values

Participants in the employee virtual workshop and the public virtual workshop were asked to share their thoughts on how the City could better communicate its DEI values to the public. Many comments reflected a “show, don’t tell” sentiment that encourages the City to focus on action that is supported by communication. Examples of comments are shown to the right.

Again, just have a diverse makeup of your council and community members and volunteers putting on and promoting events. Advertise for people of all makeups to join and that the more diverse the group is, the more diverse the events and initiatives. Promote that it can be part time. Don't just have events for specific races.

Recent (<5 years) Black female Milwaukie resident

Cultural diversity focus during different events. (Similar to the umbrella parade worksheets this year asking how your family celebrates the holidays.)

Female employee of color

Use your public spaces where the residents traffic to encourage and highlight the various peoples who live here. Artwork, talks, conversation groups led by residents who have non-mainstream cultures.

Male employee of color

Continue inviting comments from and forming partnerships with underserved communities (or the community partners who serve these residents). Host listening sessions like the ones currently offered for staff.

White employee

The NDA [neighborhood district association] model the City uses is fantastic to reach out to community members. There also is focus on creating other work groups of citizens such as the equity committee and other groups which are also beneficial.

White male employee

Summary of Findings — Diversity, equity and inclusion plan

After analyzing study results, Keen Independent presents an evidence-based set of Diversity, Equity and Inclusion (DEI) recommendations and goals tailored to the needs and contexts of the City of Milwaukee. This plan aims to establish a process of planning, collaborating, execution and review and adjustment related to DEI objectives, as displayed in Figure 6. Keen Independent’s recommendations focus on the following City functions and operations:

- Employment;
- Procurement;
- Services to the community; and
- Public engagement and communications.

Summaries of DEI recommendations, by topic, are included on the following pages. Please note that these strategies will need to be reviewed by City leadership and implemented as appropriate. Ultimately, the City must determine if and how it wishes to prioritize these recommendations. For guidance, Keen Independent has put three recommendations from each set in bold type to indicate actions we believe would be most impactful.

Responsible parties. Parties responsible for initiating the listed DEI strategies and following through with efforts include the Milwaukee City Council, City Manager, heads of each department as well as staff from the City Manager’s Office, Community Development, Human Resources, Planning, Public Works and other divisions and departments.

7. Diversity, equity and inclusion strategic process



Summary of Findings — Diversity, equity and inclusion plan

8. Recommended employment DEI goals

Employment

1. Continue substantial ongoing efforts and policies to encourage and protect employees
- 2. Further expand recruitment of diverse groups for jobs with few diverse workers**
 - Analyze representation by job
 - Develop additional (multilingual) recruitment materials and methods
 - Expand partnerships with community organizations
 - Present and distribute information in a culturally relevant manner
3. Build pipelines for jobs that currently show little diversity by developing long-term relationships with schools and other groups
4. Review job descriptions to eliminate any barriers to hiring diverse employees
- 5. Standardize the application screening and scoring processes through Human Resources (already implemented)**
6. Continue to encourage representation of people of color and women on interview panels
- 7. Continue to monitor rates of hiring, promotions and separations and explore reasons for any disparities**
 - Develop protocols for collecting data that will ensure the City can track progress on hiring, promotions and separations
 - Consider ways to leverage existing systems or invest in new systems to collect requisite data
8. Continue DEI training at regular intervals and consider ways to implement more informal conversations about DEI into regular meetings
9. Build DEI into regular in-person employee and supervisor training, inclusive of represented employees (DEI principles should be routine)
10. Incorporate DEI objectives in all employee performance reviews including the leadership team
11. Ensure strong informal complaints processes and whistleblowing policies that minimize fear of retribution
12. Continue conducting City-wide employee surveys on an annual or biennial basis

Summary of Findings — Diversity, equity and inclusion plan

9. Recommended procurement DEI goals

Procurement

1. Continue complying with federal and state contracting requirements
- 2. Reach out to small, diverse businesses for bids for procurements under the thresholds requiring formal competitive processes**
3. Promote competitive bidding opportunities through organizations that represent minoritized groups such as the Oregon Association of Minority Entrepreneurs
- 4. Consider investing in a bid management system with more robust reporting and bid solicitation capabilities**
5. Encourage representation of people of color and women on evaluation panels
6. Review contract specifications and evaluation criteria to minimize any barriers
7. Examine whether contractors (and subcontractors) are promptly paid
- 8. Consider participating in a disparity study to examine whether minority- and woman-owned firms receive an equitable share of City contract dollars**
9. Consider ways to support DBEs in the COBID certification process

Summary of Findings — Diversity, equity and inclusion plan

10. Recommended service DEI goals

Services and service delivery

1. Seek new funding sources for the City to implement more equity-relevant work
 2. Continue to consider options to better serve low-income customers and low-use utility customers
 - 3. Consider expanding translation and multilingual messaging regarding services and fee relief programs**
 4. Consider how external DEI efforts align with City goals and objectives and allocate resources appropriately
 - 5. Continue to promote income-based programs that provide relief from fees across the City's communication channels**
 6. Consider new approaches to hear from underserved groups when making service decisions
 7. Solicit the involvement of members of communities who celebrate cultural holidays in the planning of City-sponsored celebrations
 8. Heavily promote City-sponsored events on multiple channels (e.g., Pilot, Engage Milwaukie, social media)
 - 9. Determine key metrics for community satisfaction with events and services that will support future decision-making (along with staff input and up-to-date best practice literature)**
-

Summary of Findings — Diversity, equity and inclusion plan

11. Recommended public engagement and communication DEI goals

Public engagement and communications

- 1. Invest in telling the Milwaukie story (including around DEI), highlighting changes and achievements**
- 2. Expand multilingual communications (particularly Spanish) throughout all communications platforms**
3. Evaluate communications for culturally conscious messaging, avoid tokenization
4. Seek stakeholder feedback on DEI initiatives and messaging regarding DEI
- 5. Publicize the City's efforts at advancing physical accessibility and going beyond ADA compliance**
6. Seek out and learn from hard-to-reach community members who do not typically participate in Milwaukie engagement efforts

Summary of Findings — Implementation

Next Steps

With research results and the proposed DEI recommendations in hand, leaders within the City of Milwaukie can take the following next steps to consider, refine and implement the new DEI Plan:

1. Review Keen Independent recommendations with the Equity Steering Committee, City Council and employee affinity groups to prioritize objectives and tactics.
2. Obtain approval (and consensus) across City leadership regarding the DEI recommendations and goals.
3. Integrate elements of the recommendations into the City's three-year strategic plan and departmental workplans.
4. Assign equity-related responsibilities to specific parties and ensure an understanding of duties.
5. Set and organize equity benchmarks and communicate them internally (and externally, as appropriate).
6. Plan for and allocate equity-related resources (i.e., staffing, funding and time).
7. Set regular check-ins (several times per year, over several years) with leadership and managers regarding DEI progress.
8. Create an internal and external communications strategy to share the DEI recommendations and goals with stakeholders, and communicate current and future successes.

APPENDIX A. Current Plans and Activities — Plans, budgeting and policing

Keen Independent analyzed the City of Milwaukee's current plans and activities through a DEI lens. Areas of focus include:

- City plans, budgeting and policing;
- DEI training; and
- Employee Engagement Survey.

This appendix highlights the strengths of existing City activities as they relate to DEI and suggests areas where the City might improve. Major categories of the City's current activities that Keen Independent examined for this assignment include the Comprehensive Plan, budgeting and policing. Each are summarized, focusing on their DEI implications, in the following section.

Comprehensive Plan

The City of Milwaukee Comprehensive Plan was adopted in 2020 and outlines the vision for the city through 2040. The plan was created using input from more than 600 members of the community and has several sections relevant to DEI. Each section of the plan contains goals with corresponding policies that help achieve those goals.

Land use categories. The Comprehensive Plan narrative acknowledges that zoning laws and land use categories have historically favored single-family homes, which has severely limited affordable housing

options for Milwaukee residents over time. House Bills 2001 and 2003 mandated an update to the land use categories that the City was scheduled to complete in 2022.

Zoning laws across the country, have a well-documented history of weaponization against Black, Latinx and Asian residents¹ and other groups. Single-family zoning ordinances have been used to restrict LGBTQ+ residents' access to housing.² The City has recognized the exclusionary outcomes of land use and has worked on revising zoning ordinances, which demonstrates a commitment to justice and inclusion.

Section 1. Community Engagement. The community vision statement that prefaces the section on community engagement describes Milwaukee as inclusive and diverse and highlights the City's commitment to celebrating differences. The section outlines the City's methods of engaging its residents, which include citizen boards and committees, social media outreach and neighborhood events.

Specifically, neighborhood district associations (NDAs) are mentioned as a method of engaging the community. Historically, researchers have concluded that people of color participate less in voluntary associations, though poverty and neighborhood composition are also large factors in participation.³ The City using multiple means of connecting with racially marginalized residents, particularly cultivating relationships with community organizations is crucial to ensuring that all voices are heard.

³ Stoll, M. A. (2001). Race, neighborhood poverty, and participation in voluntary associations. *Sociological Forum*, 16(3), 529-557. <https://doi.org/10.1023/A:1011956632018>

¹ E.g., see Rothwell, J. (2010). Racial enclaves and density zoning: The institutionalized segregation of racial minorities in the United States. *American Law and Economics Review*, 13(1), 290-358. <https://doi.org/10.1093/aler/ahq015>

² Oliveri, R. C. (2016). Single-family zoning, intimate association, and the right to choose household companions. *Florida Law Review*, 67(4), 1401-1453. <https://scholarship.law.ufl.edu/flr/vol67/iss4/8>

A. Current Plans and Activities — Plans, budgeting and policing

Community engagement goals emphasize the need for the City to be inclusive and ensure accessibility to residents of all backgrounds. Additionally, the City has a goal to prioritize transparency, particularly in land use policy decision-making. The City created the Comprehensive Plan Advisory Committee (CPAC) comprised of residents representing all neighborhoods. CPAC advised on the creation of the Comprehensive Plan and provided an avenue for the City to communicate progress to the community.

Section 2. History, Arts and Culture. Because community feedback indicated that arts and culture were important parts of the history of Milwaukee, the City included goals addressing art in its Comprehensive Plan. The goal that focused on honoring Milwaukee’s heritage has a policy that mentions recognizing the indigenous Clackamas Tribe. The City may benefit from more specificity in how their efforts to recognize the tribe will manifest but including a policy that names the indigenous inhabitants and caretakers of their land goes beyond plans typically found for other cities.

Additionally, the Comprehensive Plan has a goal and policies centered on creating art that reflects the diversity of the community and fostering creative spaces where members of the community can engage with the arts. These policies emphasize accessibility broadly (e.g., financially, geographically, physically), community organization involvement and diversity of types of arts and cultural events.

Section 3. Natural Resources and Environmental Quality. Events like the Flint water crisis have brought environmental racism to the forefront of political discourse in recent years.⁴ The City of Milwaukee

explicitly defines and names environmental justice as a factor informing the creation of goals related to the environment. Acknowledging that racially minoritized and low-income communities are most exposed to poor environmental quality, the Comprehensive Plan prioritizes planting trees in historically marginalized communities.

Section 5. Natural Hazards. The section of the Comprehensive Plan addressing natural disasters acknowledges that vulnerable populations, including lo- income, elderly, non-English speaking and disabled persons, are disproportionately affected and need more support from emergency response services. Policies in this section include outreach to vulnerable communities to inform them of disaster preparedness and prohibiting public facilities that serve vulnerable populations from being located in areas prone to natural hazards.

Section 7. Housing. Access to affordable housing is the focus of the section addressing key issues that affect housing in Milwaukee. More than half of renters in Milwaukee spend more than a third of their income on housing. One of the factors leading the City Council to declare a state of emergency in Milwaukee in 2016 was this lack of affordable housing for residents. The plan also discusses equity, explicitly acknowledging the structural barriers that racially minoritized groups have faced in the housing market.

⁴ Henderson, S., & Wells, R. (2021). Environmental racism and the contamination of Black lives: a literature review. *Journal of African American Studies*, 25(1), 134-151.

A. Current Plans and Activities — Plans, budgeting and policing

The first set of housing goals are equity and affordability. Policies like developing a wider range of housing choices, removing zoning ordinances that restrict affordable housing in marginalized communities and supporting programs that provide relief to unhoused individuals work toward creating a more equitable, inclusive community.

Section 8. Urban Design and Land Use. To “enhance livability” in the city, the Comprehensive Plan prioritizes inclusiveness in urban design. It specifically names age and ability as factors to consider when making public improvements. Additionally, this section discusses ensuring equitable space for different modes of transportation, including buses, bicycles and walking. Including more opportunities for public feedback into urban design is listed as a priority for the City.

Section 10. Public Facilities and Services. The first public facilities and services goal has policies that focus on serving vulnerable populations and reducing disparities in access to City services. This section includes a policy regarding equitable access to high-speed internet.

Section 11. Economic Development. Milwaukee’s Comprehensive Plan acknowledges housing, zoning, job availability and purchasing power as factors that influence the city’s economic development. The overarching goal of this section on economic development is to ensure an inclusive economy that benefits residents and businesses alike. In the goal around land use, the plan indicates a focus on ensuring that fresh food is accessible in all neighborhoods.

Another goal in this section contains actions to develop Milwaukee businesses and workers such that they are competitive. The Comprehensive Plan does not explicitly mention development of local small businesses or minority- and woman-owned businesses.

A. Current Plans and Activities — Plans, budgeting and policing

Future planning recommendations. Overall, the City has successfully incorporated DEI elements into its Comprehensive Plan. Since the Plan was updated recently (2020), there are currently no plans for any immediate revisions. However, the City typically revisits the Comprehensive Plan every 10 to 15 years.

- Policies in this document read more as sub-goals, since they are still broad in scope. In future plans, the City might consider supporting its goals with objectives, which are realistic, measurable actions that help make progress toward goals.⁵

For example, one community engagement policy is to “reduce barriers to participation by considering language, meeting time, location, and required level of involvement.” This policy could be broken into objectives that include actions like ensuring that 100 percent of public meeting materials are translated into Spanish, determining the two most popular day/time options for public meetings based on prior public meeting attendance data, and identifying five potential meeting locations within a 10-minute drive of 95 percent of the Milwaukee population.

- Some sections of the current Comprehensive Plan would benefit from upfront framing of equity. In future plans, the City may consider explicitly stating how equity factors into each section.

The land use categories section is a good example of effective DEI framing that acknowledges past harms and addresses how the City plans to remedy them. Other sections like Public Facilities and Services do not explicitly include any DEI context even though they contain goals that address DEI.

- A limited number of sections do not include DEI language or goals, such as Transportation. In future iterations of the Plan, the City might consider including context and goals that reflect the accessibility and inclusion in these subject areas.

⁵ It is possible that individual City departments make use of objectives in their internal documents, but Keen Independent did not review these as part of this assignment.

A. Current Plans and Activities — Plans, budgeting and policing

Budgeting

The Budget Committee, which consists of five members of the City Council and five citizen appointees (all with equal votes), convenes as directed by the Council and reviews the City Manager’s proposed budget. After review, the Budget Committee makes recommendations to the City Council for adoption. Members of the Budget Committee serve four-year terms.

Adopted budgets. The fiscal year for Milwaukee begins in July and ends in June. The City adopts a biennial budget, proposed by the City Manager, reviewed by the Budget Committee and approved by the City Council. The June 2022–July 2024 budget reflects the goals and policies outlined in the Comprehensive Plan, which largely center on equity. Priorities in this proposed budget include:

- Community engagement efforts focused on equity;
- Transition of residential energy customers to a renewable energy program;
- Trees and other greenery throughout the city; and
- Affordable housing developments.

These priorities, which preface the budget, provide context for how the City allocates its resources and demonstrates concrete action toward making Milwaukee a more equitable and inclusive place to live.

Annual financial reports. At the end of each fiscal year, the City publishes a People’s Annual Financial Report detailing the budgeting process, audit results, strategic priorities, income, expenditures and how taxpayer money is spent. The report for fiscal year 2021 is prefaced by the City’s goals, which include equity, justice and inclusion. The goals section acknowledges the historic atrocities perpetuated against Black, Indigenous and other racially minoritized communities and commits the City to redirect some of its financial resources in future budgets to address systemic racism.

Boards and committees. The annual financial reports also discuss the City’s boards and committees that advise on budget matters. Committee members are appointed by the City Council following voluntary application and interviews. These boards have substantial influence over the budget and the City may consider rounding out efforts to recruit diverse candidates to ensure that diverse voices have a seat at the table.

A. Current Plans and Activities — Plans, budgeting and policing

Policing

Comprised of 33 sworn officers and about six support staff, the Milwaukee Police Department (MPD) has dozens of policy and procedure documents that guide its practices.

Police onboarding. To become a sworn officer, recruits train for 18 months and learn most of their job skills from patrolling. Among the MPD’s core values stated in its training documents is community engagement, which emphasizes taking time to listen to feedback. Building trust with the community is integral to the success of the police force and the MPD has several training activities that create bonds between officers and citizens, including:

- BIPOC Listening Sessions, in which officers listen to the concerns of racially minoritized community members;
- Shop with a Cop, in which an officer paired with a child with an incarcerated caretaker shop for gifts for the child’s family;
- Coffee with a Cop, in which citizens are invited to get to know police officers over coffee; and
- Volunteer opportunities for police and their families, like the Special Olympics and Bikes for Kids (refurbishing old bicycles to donate to children from under-resourced neighborhoods).

Additionally, police training documents explicitly define equity and marginalization. Equity is centered on ensuring positive community contacts, which also acknowledges that past methods of traditional policing (e.g., making as many stops as possible) are outdated and counterproductive to this goal. Between January 2020 and December 2021, City of Milwaukee employees have had four DEI training sessions

Use of force policies. MPD has a Use of Force Policy and a Deadly Force Review Policy.

The former states that police “may use reasonable force” in their duties if they have determined it is warranted based on their assessment of several outlined factors. If an officer observed another officer using force that goes “beyond that which is objectively reasonable under the circumstances, they have a duty to intervene. Additionally, the Use of Force Policy highlights de-escalation as a tactic with the goal of ensuring a situation gets resolved as safely as possible and without injury. The policy explicitly prohibits police use of chokeholds and carotid restraints in any situation.

The policy outlining how use of deadly force is reviewed includes a review board that convenes when a person is injured or killed by police. This review board consists of an MPD Sergeant, at least one other MPD sworn officer, the City HR Director (or proxy) and a representative from the Clackamas County District Attorney’s Office. The board is tasked with investigating the use of force, which includes notifying and interviewing the involved officer, reviewing documents relevant to the incident and considering any legal implications.

Racial profiling. Beginning with a definition of racial profiling, the Racial/Bias Based Profiling Policy clearly states that racial/bias-based profiling is illegal and not tolerated within the MPD. Any time an officer detains an individual, the officer must provide sufficient justification for the detention that does not involve the individual’s race or ethnicity. All MPD officers receive some form of bias training and are encouraged to continue educating themselves on the matter.

A. Current Plans and Activities — DEI training

The City of Milwaukee has held DEI trainings facilitated by three providers between 2020 and 2022 that covered a range of topics.

DEI Training Content

DEI training provided to the City of Milwaukee managers and staff members has included the following topics:

- Distinctions between diversity, equity and inclusion;
- Racial identity;
- Whiteness and how it manifests;
- Techniques for handling discriminatory situations;
- DEI goal setting;
- Systemic inequities; and
- Unconscious bias.

Training Frequency

The City's first DEI training occurred in the spring of 2020 and was a two-day session held for managers first. Other staff received the same training at the end of 2020. The next session was facilitated by a different provider and was delivered to all staff in December 2021. The City had scheduled a training for May 2022 with the same provider but postponed it to 2023 due to employee concern over the frequency of the trainings.

Training Recommendations

The breadth of topics covered in prior DEI trainings for City employees extends beyond what Keen Independent has observed within other cities and municipal governments. To continue to develop staff's familiarity with DEI issues, we recommend the following:

- Hold training sessions at regular intervals (e.g., quarterly) so staff have continual opportunities to participate.
- Expand topics to include more focus on types of diversity beyond race and ethnicity (e.g., gender identity and expression, visible and invisible disabilities, intersectionality).
- Conduct a pre- and post-test of principles covered in the DEI training to gauge the extent of the retention of knowledge.
- Seek out multimodal trainings that minimize reliance on PowerPoint presentations and incorporate engaging elements like instant polling, small group activities and other activities that accommodate a diversity of learning styles.
- Ensure that training facilitators help participants create action plans to outline how they plan to apply the knowledge they gained in their work or personal life.
- Hold participants accountable for reporting how they have applied knowledge from the DEI trainings.

APPENDIX B. Recruitment and Hiring

This document summarizes the City of Milwaukee's workforce policies that relate to diversity, equity and inclusion (DEI). Sections of this document include:

- Recruitment and hiring processes and policies;
- Opportunities for attracting diverse talent;
- Recruitment materials; and
- Workforce policies.

Throughout this appendix, we present brief recommendations that will help the City increase the diversity of the workforce and support equity and inclusion in its policies and practices.

B. Recruitment and Hiring — Recruitment and hiring policies and practices

The City of Milwaukee has several policies and practices in place that can both support and hinder diversity and equity in hiring and recruitment, as detailed in this section.

Job Descriptions and Posting

When a job becomes available, the City creates a job description, posts it and manages the application process.

For open roles, the supervisor for that position makes a request to Human Resources that the role be filled. Following receipt of the request, an HR Specialist develops a job announcement containing a description of the open role and desired minimum qualifications. All job descriptions include a salary range and state that the City requires a resume and a cover letter.

The finalized job announcement is posted through the NeoGov software, which automatically posts to GovernmentJobs.com, the City website and Indeed.com. Depending on the type of job, HR may post the announcement to other sites that pertain directly to the field of the job (e.g., public works jobs are posted on the American Public Works Association job board). Job applications for the City follow the “ban the box” initiative and do not require applicants to disclose their past criminal convictions upfront.

DEI statements in City application materials. City job application forms contain a statement indicating the value the City places on diversity and inclusion. The City’s hiring documents also contain its equal employment opportunity policy, veteran preference policy and willingness to make reasonable accommodations for persons with disabilities.

Applicants. The City of Milwaukee advertises its job postings and recruits candidates from various sources including:

- Word of mouth;
- GovernmentJobs.com;
- City website and social media pages;
- PartnersinDiversity.org;
- Indeed.com; and
- Field-specific association job boards (e.g., American Public Works Association).

Internships

Because most City jobs require work experience and qualifications, the City of Milwaukee typically does not offer internship programs for students. In the past when the City has had internship programs, they worked with local colleges to create the program and source applicants.

A resource document available to job seekers on the City’s website lists Clackamas Community College as a workforce training option. However, the nature and existence of a partnership between the City and Clackamas Community College is not clear based on materials from the City website.

B. Recruitment and Hiring — Recruitment and hiring policies and practices

Section Process

The City website lists the following policies that relate directly to recruitment and hiring.

The City's Recruitment and Selection policy (number 200.45) outlines its job application process and states that all candidates must meet the minimum qualifications listed for the posted job. If an insufficient number of applications meet the minimum qualifications, the hiring manager and the Human Resources Director may adjust the minimum qualifications or fill the position with a lower-level classification and have that employee serve as a trainee.

In practice, Human Resources only posts the job opening and receives the applications. It does not screen employees for minimum qualifications as application materials (resumes and cover letters) are submitted directly to the hiring manager for the appropriate department. This decentralized process for screening potentially sacrifices the consistency with which City policies are applied.

Furthermore, the current process may lead to bias in hiring and a lack of quality control, since the standard to which all applications are held becomes muddled when judgement is left up to the hiring manager.

Employment of Relatives Policy

The City has a policy (number 200.16) that explicitly forbids individuals responsible for personnel decisions to show favoritism to candidates who are members of their family or to place two family members in the same division.

Classification System

City policy 200.6 outlines the purpose of the employee classification system. According to this policy, the HR Director must approve any potential changes to an employee's job that may affect their classification. Additionally, HR must recommend any reclassifications to the City Council for approval.

B. Recruitment and Hiring — Opportunities for attracting diverse talent

There are additional opportunities, sites and organizations that the City of Milwaukie may find useful for recruiting and ultimately hiring diverse candidates.

Websites and Job Boards

Online platforms the City may consider using to promote their jobs to a more diverse audience include the following:

- **HireX.** A hiring platform that hosts virtual job fairs in various states, including Oregon, with an emphasis on attracting diverse candidates.
- **EasterSeals Oregon.** A national non-profit organization with a Portland office that provides employment assistance to seniors, homeless veterans, people with disabilities and English language learners; and
- **Online job posting sites.** Such as:
 - **iHispano**, for Hispanic Americans and Latinx individuals;
 - **Pink Jobs**, for LGBTQ communities;
 - **Campus Pride Jobs**, for recent college graduates who identify as LGBTQ;
 - **Workforce50**, for individuals over the age of 50;
 - **AbilityLinks**, for candidates with disabilities; and
 - **BlackJobs**, for African Americans.

Partnerships with Colleges

The City of Milwaukie may find value in strengthening partnerships with local higher education institutions, such as Portland Community College, Clackamas Community College and Portland State University for internship opportunities. In particular, Clackamas Community College has an equity-focused Workforce Development Services department focused on providing training and connecting unemployed and underemployed candidates to career opportunities.

B. Recruitment and Hiring — Opportunities for attracting diverse talent

Pipeline Initiatives

Governments utilize many strategies to reach diverse candidates. Many of these strategies include a training component, as entities have found some targeted populations lack the skills required to be competitive. Internships, apprenticeship programs and diversity executive recruitment programs are examples of these.¹

Figure B-1 provides examples of pipeline initiatives used in Oregon and California that have been successful at recruiting diverse candidates for a variety of jobs.

B-1. Examples of pipeline initiatives

| | |
|--|---|
| City of Eugene's Young Women's Fire Camp | Eugene holds a no-cost Fire Camp for women aged 16 to 19. This annual week-long camp began in 2011, and encourages young women to pursue a firefighting career. |
| City of Portland's presence at minority bar associations | Portland advertises at local bar associations and encourages City counsel to join diverse law organizations, such as the Oregon State Bar's Diversity Section, the Oregon Hispanic Bar Association and the Oregon Women Lawyer's Association. Doing so promotes connections with minority candidates and increases the City's visibility as an employer in spaces of color. |
| City of Seattle's Women in the Trades | Seattle encourages women to consider futures in water pipe work, hydro-electric maintenance, machining cable slicing, utility construction work and sworn positions through the Women in the Trades apprenticeship program. This program provides paid full-time work, evening classes and guarantees employment after apprenticeship completion. |
| City and County of San Francisco's Bridge to Success | Through Bridge to Success, San Francisco provides training and national industry certification to participants in automotive technology, cement masonry, landscape maintenance, park ranging and stationary engineering. While San Francisco does not guarantee employment upon program completion, it has hired past participants. |

Sources: City of Eugene. (2015). Affirmative Action Plan 2015/2017. Retrieved on Jan. 6, 2020, from <https://www.eugene-or.gov/DocumentCenter/View/2396/City-of-Eugene-Affirmative-Action-Plan---20152017?bidid=>; City of Portland. (2018). Action Strategies. Bureau Affirmative Action Strategies. Retrieved on Dec. 14, 2020, from <https://www.portlandoregon.gov/bhr/article/679723>; City of Seattle. (2020). Women in the Trades. Office for Civil Rights. Retrieved on Jan. 6, 2021, from <http://www.seattle.gov/civilrights/what-we-do/gender-justice-project/what-we-do/workforce-equity/women-in-the-trades>; City and County of San Francisco. (2020). "Bridge to Success." Department of Human Resources. Retrieved on Jan. 6, 2021, from <https://sfshr.org/apprenticeshipsfb-bridge-to-success>.

¹ National Academies of Sciences, Engineering, and Medicine 2001. Practical Resources for Recruiting Minorities for Chief Executive Officers at Public Transportation Agencies. Washington, DC. The National Academies Press. <https://doi.org/10.17226/13324>.

B. Recruitment and Hiring — Opportunities for attracting diverse talent

Recruitment and Selection Policy Changes under Discussion at the City

At the time Keen Independent was analyzing City HR policies and procedures, the City was considering changes to policies and practices.

The Human Resources Director notes that 29 percent of City job applicants in the past three years were nonwhite, but only 15 percent of new hires were nonwhite. At the time of this analysis, 8 percent of the City's total workforce was nonwhite. It appears that applicants of color are less likely to be hired than other applicants.

The policy change proposed by the HR Director aims to reduce potential disparities by having HR review applications for minimum qualifications prior to referring them to the departmental hiring manager. Additionally, the proposal seeks to mandate bias training for anyone who participates in the hiring process and create a scoring system for applications to be determined in advance.

Keen Independent supports these proposed changes, as they can lead to more fair and equitable hiring practices based on standardized criteria.

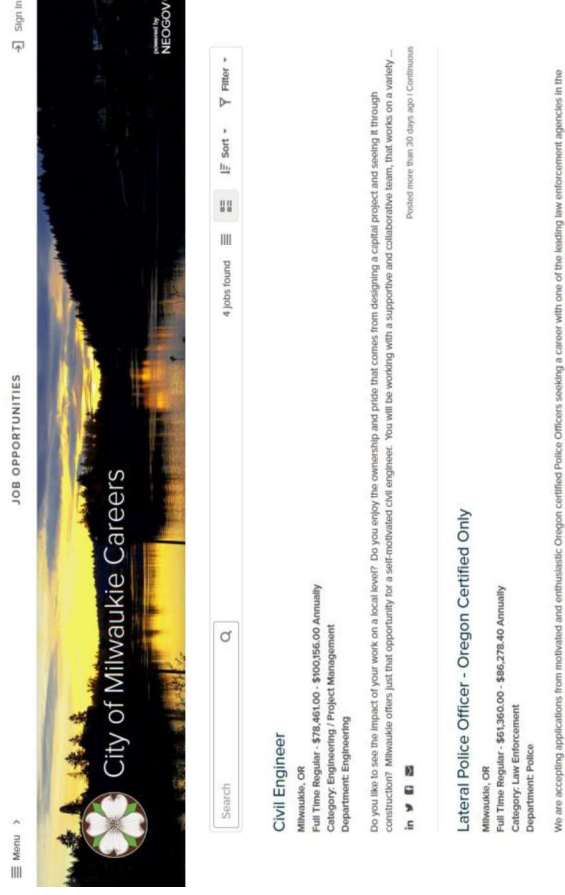
B. Workforce Policies and Practices — Recruitment materials

This section describes the City's current jobs webpage and offers suggestions for communicating that diversity is valued.

Current City Job Listing Webpage

Demonstrated in Figure B-2, the City of Milwaukie's Job Opportunities webpage has no images nor stated approach to recruitment as of the writing of this report (though the individual job listings do contain DEI and equal opportunity employment statements). In prior studies, Keen Independent has examined government agencies' recruitment materials that purposefully use images of women and people of color to promote a sense of diversity among potential recruits.

B-2. Image of City of Milwaukie Job Opportunities webpage



Source: <https://www.governmentjobs.com/careers/milwaukieor>

B. Workforce Policies and Practices — Recruitment materials

Based on experience with other government entities, Keen Independent makes the following recommendations related to the City of Milwaukee’s communication of diversity, equity and inclusion values in their job postings.

Opportunities to Communicate DEI Values

The study team recommends the City consider adding text and images that portray diverse workers. Racialized and gendered imagery can be sensitive and difficult to navigate. The Government Alliance on Race and Equity (GARE)² suggests being “as thoughtful about ... images as we are ... language.” To do so, they recommend that organizations invest time and resources in selecting thoughtful imagery that conveys the right message.

A few guidelines to selecting imagery for hiring and recruitment communications appear below:

- Be true to real communities by using authentic images. Resist the urge to select images of “diversity” if what is shown does not accurately reflect the makeup of the community.
- Avoid images with stereotypes and cultural appropriation.
- Beware of visual “tokenism” where one person of color is used as the “figure head” or focus of the image.
- Avoid whitewashing, including images of lighter-skinned people of color and/or “whitening” images through editing software.

These recommendations should be kept in mind when selecting hiring material imagery.

² GARE. (2018, May 18). “GARE Communications Guide.” RacialEquityAlliance.org. Retrieved from <https://www.racialequityalliance.org/tools-resources/communication-tools/1-052018-gare-comms-guide-v1-1-2/>

B. Workforce Policies and Practices — Employment policies

We conclude this report with a summary of City policies that pertain directly to employment.

Employment Policies

City of Milwaukie employment policies include the following.

Americans With Disability Act Accommodation (Policy Number 200.1). The City states its nondiscrimination policy with regard to persons with disabilities and provides reasonable accommodations related to disabling conditions. The City's policy is standard and upholds the fundamental requirements of the EEOC's Americans with Disabilities Act regulations.³

Breastfeeding Support (Policy Number 200.61). The City provides accommodations for regular rest periods and privacy for activities related to breastfeeding. This policy complies with the Oregon Administrative Rules regarding breastfeeding.

Bullying (Policy Number 200.19). The City describes the zero-tolerance policy for bullying and provides examples of overt (e.g., derogatory remarks) and covert (e.g., social exclusion) types of bullying. The process for reporting instances of bullying is outlined and the policy contains a clause prohibiting retaliation. This policy is currently under review with minor language changes suggested.

COVID-19 Infectious Disease Control Plan. In 2020, the City adopted a plan that outlines prevention and control measures and provides a protocol for responding to potential exposures to COVID-19. This policy

is in line with recommendations from OSHA as of August 2022 but we note that changes are possible given updates to CDC guidelines.⁴

Conduct and Discipline (Policy Number 200.9). This policy outlines improper conduct in the workplace, such as harassment, failure to follow ethics requirements and offensive language. The City aims to correct improper behavior first but if repeated attempts are made with no improvement, employees may be subject to disciplinary action, including dismissal. This policy is currently under review with minor language changes suggested.

Equal Employment and Anti-Harassment (Policy Number 200.15). The City is dedicated to creating a workspace that emphasizes respect, dignity and equal employment opportunities. This policy covers federally protected classes (e.g., race, gender, sexual orientation, religion, etc.), provides examples of prohibited behavior, has clauses that prevent retaliation and explains reporting processes.

This policy combines two previous City policies (Equal Employment Opportunity Policy and Affirmative Action and Discrimination and Harassment Policy) and is currently under review with minor language changes suggested.

Sick Leave Donation Program (Policy Number 200.52). For employees facing serious health difficulties or caring for family members with serious health conditions, the City allows other employees to donate sick leave to prevent a loss of income.

³ U.S. EEOC. (n.d.). The Americans with Disabilities Act Amendments Act of 2008. *United States Federal Government*. Retrieved from <https://www.eeoc.gov/statutes/americans-disabilities-act-amendments-act-2008>

⁴ OSHA (). COVID-19 Control and Prevention. *United States Department of Labor*. Retrieved from <https://www.osha.gov/coronavirus/control-prevention>

APPENDIX F. Procurement Analysis — Policies and procedures

Using documents provided by the City and information from interviews with representatives from the City's Finance Department, Keen Independent analyzed how the City procures construction, goods and services.

The study team also analyzed the City's procurement policies that relate to equity and utilization of minority- and woman-owned businesses, small businesses and businesses operated by disabled veterans.

Appendix F is organized into the following two parts:

- Procurement policies and procedures; and
- Equity in procurement.

Procurement Rules

The State of Oregon's Public Contracting Code requires public agencies, including cities, to establish and follow specific guidelines when procuring construction, goods or services from vendors. To do so, the City has opted out of following Oregon's Model Rules and Administrative rules and has created its own public contracting rules that are compliant with Oregon Revised Statute (ORS) 279 (and use portions of the Model Rules).

The City's rules are a combination of the following:

- The State of Oregon's Public Contracting Code (ORS 279A, 279B, 279C);
- The State of Oregon's Attorney General Model Rules (Chapter 137, Division 46-49);
- Rules and guidelines stipulated specifically by and for the contracting agency (subject to Oregon Revised Statutes); and
- Rules unique to the City that are at least as restrictive as those stipulated by the above.

F. Procurement Analysis — Policies and procedures

Decentralization

Each City department handles its own procurement following the overall guidelines the City has established. When multiple departments require the same goods or services, they will sometimes jointly seek a contractor or vendor, but these instances of coordination are rare.

Individual department responsibilities. Steps City departments follow include:

1. Choosing the appropriate procurement type based on the contract amount and type of services.
2. Ensuring that funds are available and obtaining a purchase order signed by the appropriate authority.
3. Preparing a bid solicitation outlining the specifications and scope of services requested.
4. Soliciting bids, either through the City's bid management system or through informal means, depending on the requirements of the procurement type.
5. If the contracting method is not low bid, determining the evaluation criteria that are consistent with City rules and using the scoring system to determine a contract award.

Finance Department responsibilities. The City's Finance Department primarily serves a compliance role in the procurement process. Finance Department responsibilities concerning procurement include:

- Ensuring departments comply with public contracting rules and obtained the proper signing authority;
- Managing executed contacts, purchase orders and payable records and processing payments;
- Notifying departments of existing contracts with upcoming expiration dates; and
- Providing resources and support to department personnel throughout the procurement process.

F. Procurement Analysis — Policies and procedures

Procurement Process

Tables on the following pages summarize the City's procurement processes for its state and locally funded contracts (Figure F-1) and its federally funded contracts (Figure F-2). The tables show:

- Dollar thresholds and other factors that determine different procurement methods;
- Bidding requirements;
- Basis for awarding contracts;
- Rules regarding advertisement of invitations to bid or propose; and
- Information about use of emergency contracts.

Figures F-1 and F-2 provide Information for contracts in different industries (goods and services, architecture and engineering services, other personal services, construction, and technology/software).

F. Procurement Analysis — Policies and procedures

F-1. City procurement practices for state and locally funded contracts

| | Goods and services (including trade-related services) | Personal services - A&E (e.g., architect, engineer, land surveyor, transportation planner) | Personal services - Other (e.g., legal counsel, accountant, graphic design, IT consultant, instructors) | Construction (public improvement projects) | Technology/software (e.g. software, licensing and cloud-based services) |
|--------------------------------------|---|--|---|--|---|
| Bidding thresholds | | | | | |
| Requiring formal competitive process | Above \$150,000 | Above \$250,000 | Above \$150,000 | Above \$50,000 for transportation projects, above \$100,000 for other construction | Above \$150,000 |
| Intermediate procurement | \$10,001–\$150,000 | \$100,001–\$250,000 | \$50,001–\$150,000 | \$10,001–\$50,000 for transportation, \$10,001–\$100,000 for other construction | \$10,001–\$150,000 |
| Small procurement | \$10,000 or below | \$100,000 or below | \$50,000 or below | \$10,000 or below | \$10,000 or below |
| Bidding requirements | | | | | |
| Competitive sealed bids | Public advertising and notice at least 14 days before bid closing | N/A (no bids, only proposals) | N/A (no bids, only proposals) | Public advertising and notice at least 14 days before bid closing | Public advertising and notice at least 14 days before bid closing |
| Competitive sealed proposals | Public advertising and notice at least 21 days before bid closing | Notice of selection procedures at least 21 days before bid closing | Notice of solicitation at least 21 days before closing | Public advertising and notice at least 21 days before bid closing | Public advertising and notice at least 21 days before bid closing |
| Intermediate procurement | Informal solicitations from at least 3 qualified sources | Seek at least 3 proposals | Seek at least 3 proposals | Informal solicitations from at least 3 qualified sources | Informal solicitations from at least 3 qualified sources |
| Small procurement | No bidding required | No bidding required | Competitive to the extent practicable | No bidding required | No bidding required |
| Means of public advertising | At least once in at least one local newspaper and in at least one statewide trade publication | At least once in an appropriate trade periodical or general circulation newspaper | At least once in an appropriate trade periodical or general circulation newspaper | At least once in at least one local newspaper | At least once in at least one local newspaper and in at least one statewide trade publication |
| Basis for award | | | | | |
| Competitive sealed bids | Lowest responsive and measurable bidder based on bid documents | N/A (no bids, only proposals) | N/A (no bids, only proposals) | Lowest responsive and measurable bidder based on bid documents | Lowest responsive and measurable bidder based on bid documents |
| Competitive sealed proposals | Best responsive and responsible proposer based on criteria in solicitation documents | Experience, capabilities, resources, past record and other factors | Experience, capabilities, resources, past record and other factors | Best responsive and responsible proposer based on criteria in solicitation documents | Best responsive and responsible proposer based on criteria in solicitation documents |
| Intermediate procurement | At City's discretion (no criteria listed) | Capability, experience, project approach and price | Capability, experience, project approach and price | At City's discretion (no criteria listed) | At City's discretion (no criteria listed) |
| Small procurement | Acceptable quality at competitive prices | Direct appointment of qualified consultant | Availability, capability, experience, price and location | Acceptable quality at competitive prices | Acceptable quality at competitive prices |

Source: City of Milwaukee Local Contract Review Board – Public Contracting Rules, Keen Independent Research.

F. Procurement Analysis — Policies and procedures

F-2. City procurement practices for federally funded contracts

| | Goods and services (including trade-related services) | Personal services - A&E (e.g., architect, engineer, land surveyor, transportation planner) | Personal services - Other (e.g., legal counsel, accountant, graphic design, IT consultant, instructors) | Construction (public improvement projects) | Technology/software (e.g. software, licensing and cloud-based services) |
|--------------------------------------|---|--|---|--|---|
| Bidding thresholds | | | | | |
| Requiring formal competitive process | Above \$150,000 | Above \$150,000 | Above \$150,000 | Above \$150,000 | Above \$150,000 |
| Micro purchases | \$10,001–\$150,000 | \$10,001–\$150,000 | \$10,001–\$150,000 | \$10,001–\$50,000 for transportation, \$10,001–\$100,000 for other construction | \$10,001–\$150,000 |
| Small purchases | \$10,000 or below | \$10,000 or below | \$10,000 or below | \$2,000 or below | \$10,000 or below |
| Bidding requirements | | | | | |
| Competitive sealed bids | Public advertising and notice at least 14 days before bid closing | N/A (no bids, only proposals) | N/A (no bids, only proposals) | Public advertising and notice at least 14 days before bid closing | Public advertising and notice at least 14 days before bid closing |
| Competitive sealed proposals | Public advertising and notice at least 21 days before bid closing | Notice of selection procedures at least 21 days before bid closing | Notice of solicitation at least 21 days before closing | Public advertising and notice at least 21 days before bid closing | Public advertising and notice at least 21 days before bid closing |
| Intermediate procurement | At least 3 informally solicited competitive bids, quotes or proposals | At least 3 informally solicited competitive bids, quotes or proposals | At least 3 informally solicited competitive bids, quotes or proposals | At least 3 informally solicited competitive bids, quotes or proposals | At least 3 informally solicited competitive bids, quotes or proposals |
| Small procurement | No bidding required | No bidding required | Competitive to the extent practicable | No bidding required | No bidding required |
| Means of public advertising | At least once in at least one local newspaper and in at least one statewide trade publication | At least once in an appropriate trade periodical or general circulation newspaper | At least once in an appropriate trade periodical or general circulation newspaper | At least once in at least one local newspaper | At least once in at least one local newspaper and in at least one statewide trade publication |
| Basis for award | | | | | |
| Competitive sealed bids | Lowest responsive and responsible bidder based on measurable criteria in the bid documents | N/A (no bids, only proposals) | N/A (no bids, only proposals) | Lowest responsive and responsible bidder based on measurable criteria in the bid documents | Lowest responsive and responsible bidder based on measurable criteria in the bid documents |
| Competitive sealed proposals | Best responsive and responsible proposer based on criteria in solicitation documents | Experience, capabilities, resources, past record and other factors | Experience, capabilities, resources, past record and other factors | Best responsive and responsible proposer based on criteria in solicitation documents | Best responsive and responsible proposer based on criteria in solicitation documents |
| Intermediate procurement | At City's discretion (no criteria listed) | Capability, experience, project approach and price | Capability, experience, project approach and price | At City's discretion (no criteria listed) | At City's discretion (no criteria listed) |
| Small procurement | Acceptable quality at competitive prices | Direct appointment of qualified consultant | Availability, capability, experience, price and location | Acceptable quality at competitive prices | Acceptable quality at competitive prices |

Source: City of Milwaukie Local Contract Review Board — Public Contracting Rules, Keen Independent Research.

F. Procurement Analysis — Policies and procedures

Bidding Thresholds

Different bidding requirements apply based on the size of the contract and whether a contract is locally, state or federally funded.

State and local contracts. For state and locally funded contracts, the threshold amounts depend on the type of work, as summarized in Figure F-1.

Personal service contracts¹ for architecture and engineering have the highest threshold for competitive sealed proposals at \$250,000 and above whereas construction projects related to transportation have the lowest competitive sealed bid/proposal threshold at \$50,000 and above.

For small procurement contracts, architecture and engineering personal services are \$100,000 and below, other personal services are \$50,000 and below, and all other types of work are \$10,000 and below.

Federal contracts. For federally funded contracts, the bidding threshold amounts are more conservative, as illustrated in Figure F-2.

Bidding threshold levels use different nomenclature than state and locally funded bidding threshold levels² and are more consistent by the type of work. Competitive sealed bids/proposals are required for all types of work in which contracts exceed \$150,000. Micro purchases for federally funded contracts are those that do not exceed \$10,000 for all types of work except construction, which has a \$2,000 upper limit.

¹ Personal service contracts of any type are not subject to formal competitive bidding processes under the Oregon Public Contracting Code. The selection procedure is the City's policy.

Bidding Requirements

The City follows the same basic bidding requirements regardless of funding source (see Figures F-1 and F-2). Bidding requirements differ based on the bidding threshold, as outlined below:

- **Competitive sealed bids/proposals.** Must publicly advertise the contract for bids or proposals and give 14 to 21 days' notice of the procurement opportunity.
- **Intermediate procurement and small purchases.** Must solicit at least three competitive quotes, bids or proposals to award a contract. If there are not three qualified vendors, the City must document its efforts to obtain a sufficient number of bids/proposals and ensure that it follows its Equity in Public Procurement processes and requirements (PCR 120.000).
- **Small procurement and micro purchases.** Does not require competitive bids to award a contract. However, the federal requirements for architecture and engineering services procurement state that the bidding process should be competitive to the extent practicable.

² Note that "small procurement" and "micro purchase" are the respective state/local and federal terms the City of Milwaukie uses to refer to the lowest bidding level and "intermediate procurement" and "small purchase" refer to the middle bidding level.

F. Procurement Analysis — Policies and procedures

Basis for Award

Criteria the City uses to award state/local and federally funded procurements are as follows:

- **Competitive sealed bids.** Awarded to the lowest responsive and responsible bidder based on criteria outlined in the bid notice.
- **Competitive sealed proposals.** Awarded to the best responsive and responsible bidder based on criteria outlined in the solicitation documents.
- **Intermediate procurement and small purchases.** Contracts for goods and services, construction and technology/software are awarded at the discretion of a department. Contracts for personal services, including architecture and engineering, are awarded to the vendor whose offer will best serve the interests of the City, considering factors like qualifications, scope of work and price.
- **Small procurement and micro purchases.** Directly awarded to a qualified vendor of the department's choice.

Means of Advertising or Other Public Notice

Public advertising and notice are required for competitive sealed bids and proposals for all types of work within Milwaukie.

- City procurement policies state that advertisements must be placed in a general circulation local newspaper. Generally, advertisements are placed in the Portland Tribune/Clackamas Review, The Oregonian and/or the Daily Journal of Commerce Oregon.
- For goods and services and technology/software contracts, an advertisement must also be placed in a trade-specific periodical.
- Advertisements for personal services may be placed in either a general circulation local newspaper or a trade-specific periodical.

Subcontractors

As contractors are responsible for making payments to their subcontractors, the City does not track all subcontractors that provide services on a project. There can be multiple tiers of subcontractors but the City only requires bid respondents to indicate Tier 1 subcontractors.

Emergency Contracts

The City of Milwaukie also allows the City Manager to make emergency purchases that waive the bidding requirements. The City must document the circumstances that make the typical procurement process infeasible and make a reasonable attempt to encourage competition.

F. Procurement Analysis — Policies and procedures

Bid Management System

In addition to using newspapers and journals as described in the previous pages, the City uses a bid management system to post formal solicitations for its procurements. Firms that are interested in doing business with the City can register in the bid management system and will then be notified when the City issues formal solicitations.

Access to the bid management system. Department representatives with appropriate login credentials can post formal solicitations in the bid management system.

The City also posts answers to any questions received regarding specific solicitations in its bid management system for ease of access to bidders.

Limitations. The City's bid management system has the following limitations that impact the City's ability to manage procurement efficiently and equitably:

- When the City solicits a bid for procurement, there is no way to notify only firms that are interested and available for the type of work required in the contract. Based on Keen Independent's experience, firms often completely ignore notifications of bid opportunities from an entity when most of them are outside the types of work performed by the company.
- Vendors are not able to indicate that they are COBID-certified nor can they select an industry into which their goods and services fall.
- The City appears to have no way to generate and export reports containing information in the system, such as aggregated contact information for bidders.
- There is no capability in the system to report on diverse business participation.

Departments do not use the bid management system if a contract is under the threshold for a formal solicitation. They often will go to the firm performing an existing price agreement for the City as they have already gone through the competitive process. Alternatively, they will go back to the same firms that previously performed the work.

F. Procurement Analysis — Equity in procurement

Equity in Public Procurement

The City of Milwaukee acknowledges that small businesses and businesses owned by women and minorities have historically not had the same access to City contract opportunities as larger firms. Therefore, the City has committed to encouraging opportunities for those businesses in its procurements. The City adopted new equity requirements for procurement that went into effect on June 30, 2022.

The City's Equity in Public Procurement section of the PCR outlines the following methods designed to increase the participation of minority- and woman-owned businesses, businesses owned by disabled veterans and other small businesses in its contracts. These activities include:

- Outreach to encourage local COBID-certified businesses to conduct business with the City;
- Providing technical and logistical support COBID-certified and eligible businesses related to bonding, insurance, certification and the City's procurement process;
- Dividing work into smaller contracts that may be more feasible for COBID-certified businesses to take on, either as primary bidders or subcontractors;
- Providing recommended (but not mandatory) training for City staff on the PCR and encouraging staff to use COBID-certified businesses for contracts when possible.

- Considering modification of the insurance and bonding requirements so that more COBID-certified businesses may bid on contracts; and

- Issuing an annual report³ that shows how much the City spent on contracted goods and services and what percentage of those awards went to COBID-certified businesses.

In scoring bids/proposals, 20 percent of the total available points must be based on equity and inclusion criteria. Departments have flexibility to determine how that 20 percent is allocated. For example, a department could award the full 20 percent to a firm that is COBID-certified or they could award 10 percentage points based on COBID certification and the remaining 10 percentage points based on the diversity of the firm's team members. In sum, the City has no overarching rules concerning how departments award these points.

Sometimes prime consultants can earn points by using diverse subcontractants. This option also applies for construction contracts awarded through alternative contracting methods.

The City does not verify COBID certification of subcontractors for public improvement and construction projects. However, the City's contracts state that if the award was given in part or whole because the bidder met a DEI requirement and the City later discovers that requirement is no longer being met, the City can terminate the contract.

For small procurements, no competitive process is required, so no DEI scoring criteria are applied. Intermediate procurements can include some scored element for COBID-certified businesses.

³ As the City's equity requirements went into effect in June of 2022, the first of these reports will be available in 2023.

APPENDIX G. Vendor Virtual Workshop — Procurement process

To collect feedback on the City’s procurement process from those who are directly involved, Keen Independent held a virtual workshop with companies that have conducted business with the City or expressed interest in doing business with the City.

Similar in format to an online survey, a virtual workshop offers a platform for participants to provide thoughtful feedback. The City invited 134 business contacts to provide input and 23 people participated. The response rate was 17 percent. Respondents included business owners (22% of the total) and other representatives of companies.

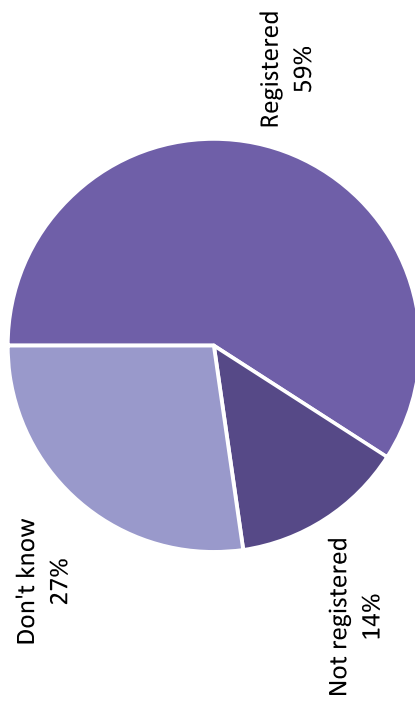
Feedback on Procurement Processes

The virtual workshop included a series of questions related to the City’s procurement process.

Bid Management System. One primary method the City uses to communicate work opportunities is the Bid Management System.

Figure G-1 displays the registration status of respondents’ businesses in the Bid Management System. About 14 percent of respondents indicated that their business was not registered in the system.

G-1. Respondents’ business registration in the Bid Management System



Note: N = 23.

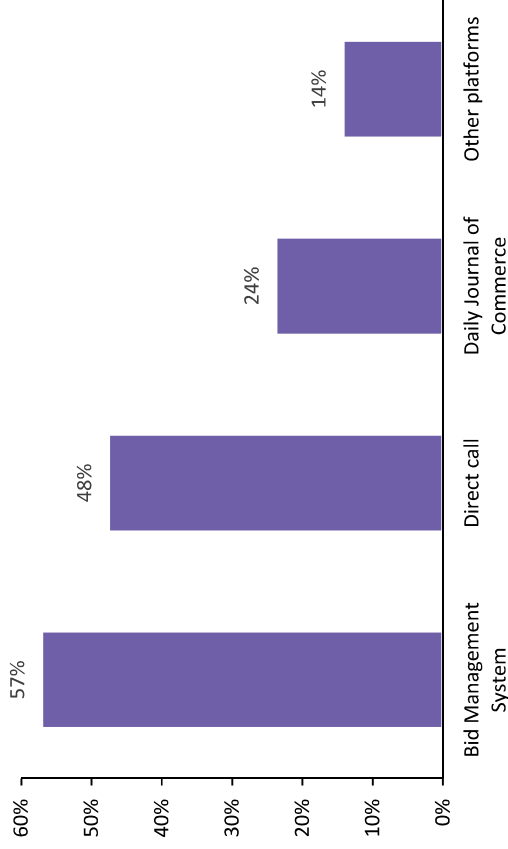
Source: Keen Independent Research.

G. Vendor Virtual Workshop — Procurement process

When respondents were asked how they heard about potential work opportunities with the City, the Bid Management System was most often mentioned as their source of information (see Figure G-2).

However, 43 percent of respondents did not mention the Bid Management System as a source of information. Most of these individuals cited a direct call from the City, hearing about a procurement in the Daily Journal or Commerce or other methods.

G-2. How respondents' businesses hear about work with the City



Note: N = 23. Percentages add up to more than 100 because respondents sometimes mentioned more than one way that they hear about work with the City.

Source: Keen Independent Research.

G. Vendor Virtual Workshop — Procurement process

Some respondents provided open-ended comments about the Bid Management System (see examples of input to the right). A few respondents were not aware of the Bid Management System but some that were provided suggestions on making the notifications process more efficient.

Currently, the City's Bid Management System does not allow for screening of notices so that only those firms that provide that product or service are notified of a procurement.

I wish there was a way to filter out non-relevant projects, but that's not super important. It just means that I don't read the bid notices as carefully as I should, b/c they are usually not relevant to my work.

White female owner of a certified Women Business Enterprise (WBE)

We receive notifications that are not relevant to us. It would be nice to be able to narrow down those that we receive.

Coordinator for a certified Women Business Enterprise (WBE)

It was easy to use and find addendums. I also liked the updates when changes happened through the bid process.

Senior Account Executive for a privately owned business

The city needs to make sure that their bids get seen through Google search, nationwide bid platforms.

Vice President of Sales for a certified Emerging Small Business (ESB)

G. Vendor Virtual Workshop — Equity in procurement

Imagining an Equitable Procurement Process

When asked to imagine an equitable procurement process, a few business representatives mentioned giving small or diverse firms an opportunity and some focused on removing barriers for firms to bid.

Examples of comments are shown to the right.

Encouragement to use diverse subconsultants. What [it] doesn't look like is mandating diversity percentages which causes subconsultants to be included only because they are diverse and not because they are competent.

Representative from a large corporation

Making sure that opportunities are transparent and not having past experiences with the City is not an impediment.

Hispanic/Latino male Principal of a certified Minority Business Enterprise (MBE)

A process that not only encourages small and disadvantaged firms to submit but also gives those firms serious consideration. It seems a lot of agencies have a bias toward giant firms.

Marketing Coordinator for a certified WBE

One that does not discriminate based on gender, race/ethnicity, or gender/sexual orientation. Depending on what other factors Milwaukee cares about, that would also include not discriminating based on business size.

White female Principal Engineer and owner of a certified WBE

I understand that application evaluators are looking for an apples to-apples way to compare applicants, but rigid [requirements] do not create an equitable process, in the same way that standardized tests aren't the best measure of a student's academic progress. That having been said, I think Milwaukee does a better job of simple straightforward RFP+ language that gets to the point of what the City is looking for.

White female owner of a certified WBE

G. Vendor Virtual Workshop — Equity in procurement

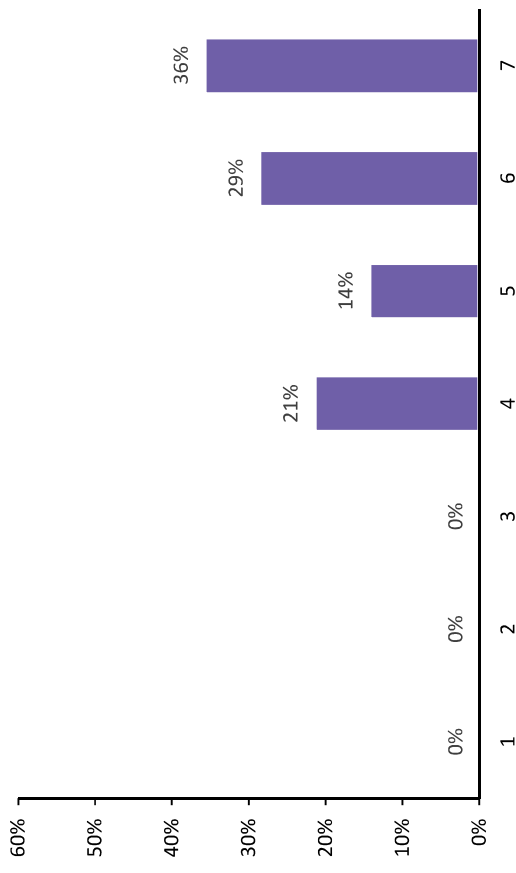
Comments about the City’s Current Procurement Process

The virtual workshop asked business representatives to consider “how equitable the City’s procurement process is” on a scale 1 (meaning not equitable at all) to 7 (meaning perfectly equitable).

About 40 percent of respondents did not know or had no opinion. Most respondents who gave a rating gave a relatively positive one.

Figure G-3 displays the distribution of responses (not including those who said “don’t know/no opinion”).

G-3. Respondents’ ratings of how equitable the City’s procurement process is



Note: N = 14.

Source: Keen Independent Research.

G. Vendor Virtual Workshop — Equity in procurement

Respondents were asked for specific comments regarding equity and the City's procurement process.

Several respondents indicated that the City's processes seem fair or that they do not have enough experience with the processes to comment.

A few comments specifically mentioned outreach to COBID-certified businesses.

One respondent indicated that focusing on DEI in procurement was disadvantageous to other firms and that the City should focus on hiring the best qualified firm for the job.

It is important to give the smaller companies a chance, a size of a company doesn't always mean success.

Vice President of Sales for a certified ESB

Reach out to firms in the COBID directory that have not submitted in the past and notify them of upcoming on-call RFQs.

Vice President of Sales for a certified ESB

Add encouragement to use diverse team members, but not percentage goals. The city could reach out to the diverse community to let them know about projects.

Representative from a large corporation

Ensure that they are involved in local minority and inclusion groups and continue to advertise through the DJC, SWCA, OregonBuys, etc.

Representative from a large corporation

The city should follow ODOT's system of using DBE if that is what the city wants to do and not make up their own system.

Vice President of a privately owned business

I really didn't see anything that made us feel like it wasn't equitable. We really liked the challenge in the process for us to be inclusive with contract language. It definitely helped us see procurement in a progressive way.

Senior Account Executive for a privately owned business

You don't define the terms "equitable", "inclusive" or others which may be open to interpretation ... This makes the process of incorporating these ... into a procurement process inherently unfair.

Representative from a Washington state-based business

G. Vendor Virtual Workshop — Equity in procurement

Communicating a Commitment to Equity in Procurement

Finally, the virtual workshop prompted respondents for feedback on how the City can best communicate its commitment to an equitable procurement process.

A few respondents mentioned communicating directly with businesses and local community groups that are operated by and/or serve members of historically marginalized communities.

A few respondents mentioned making equity in procurement more visible on the City's website. One respondent mentioned having testimonials on the City's website that may encourage other vendors who work for MBEs and WBEs to submit proposals/bids to the City.

Some participations cautioned that documented outcomes speak louder than just words stating a commitment to equity.

Continuous outreach and attendance of minority group meetings.

Representative from a large corporation

Consider promotional testimonials on website. Hillsboro recently conducted an open house for COBID vendors, where all public agency representatives were there to provide information on upcoming opportunities; it was very helpful.

Hispanic/Latino male Principal of a certified MBE

Do equitable projects. Continue to do outreach to and work with organizations which share your equity values. Support equity projects in the community. Don't just look for diverse vendors, but seek out developers and stakeholders who value equity and can help you diversify your community by being proactive about equity in all your projects.

White female owner of a WBE

Targeted solicitations to disadvantaged firms. Use of equity-based scoring criteria in selecting contractors. Publicizing positive outcomes.

Project manager for a large corporation

Actions speak louder than words. If you document the numbers on how you are performing according to measurable metrics, that will mean much more than spouting beautiful language about how you care. No one believes all your language, but they do notice numbers.

White female Principal Engineer and owner of a certified WBE

STOP! Attempting to communicate that you care about being equitable and inclusive could be viewed simply as an effort to appear equitable and inclusive rather than actually being so.

Business representative

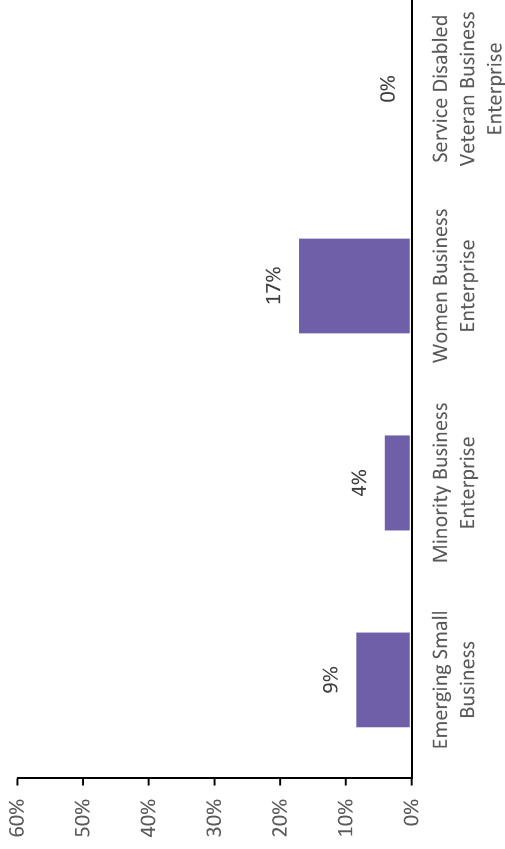
G. Vendor Virtual Workshop — Businesses participating in the virtual workshop

Business Demographics

Respondents were asked several descriptive questions about their businesses.

Certifications. Figure G-4 displays the certifications for respondents' businesses. About 17 percent of respondents represented a WBE and 9 percent represented an ESB. Only one respondent was from an MBE and no respondents represented a Service-Disabled Veteran Business Enterprise (SDVBE).

G-4. Certifications of respondents' businesses



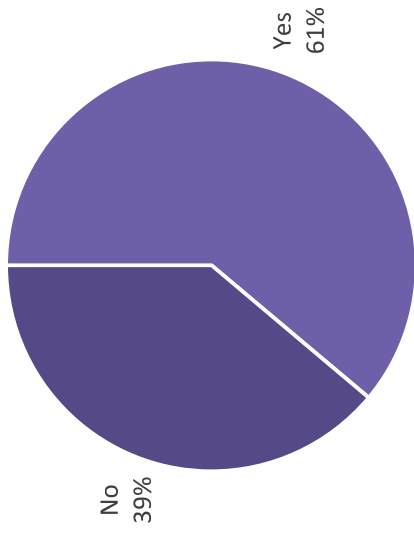
Note: N = 23.

Source: Keen Independent Research.

G. Vendor Virtual Workshop — Businesses participating in the virtual workshop

Experience working with the City. Respondents were asked to indicate whether their businesses had obtained work with the City prior to the distribution of this virtual workshop instrument. Just over 20 percent did not know or did not provide an answer to this question. Of those who did provide an answer, about 60 percent indicated that their firm had obtained work with the City while nearly 40 percent had not.

G-7. Whether respondents' businesses have obtained work with the City



Note: N= 18.

Source: Keen Independent Research.

APPENDIX H. Allocation of City Resources and Public Services

In this appendix, Keen Independent presents an overview of the Milwaukee community and how the City allocates resources and services to the community.

Data Sources

For the purposes of this analysis, Keen Independent drew data from the following sources:

- U.S. Census Bureau;
- 2023-2024 Fee Schedule;
- Comprehensive Plan;
- City budget; and
- Interviews with City staff involved in service delivery, including individuals from the Police Department, Public Works and the City Manager's Office.

Additionally, Keen Independent asked both employees and members of the public for their impressions of service delivery as part of their respective virtual workshops (detailed in Appendix D and Appendix I, respectively).

H. Allocation of City Resources and Public Services — Community profile

As background, Keen Independent reviewed available U.S. Census Bureau data on the Milwaukee population.

Demographics

Compared to the United States population overall, Milwaukee is slightly more educated, more affluent, older and less racially diverse.

H-1. Household income and education of Milwaukee residents compared to the U.S. overall (2021)

| | Milwaukee | United States |
|---------------------------------------|------------------|--------------------|
| Total households | 9,220 | 128,586,317 |
| Household income | | |
| \$24,999 or less | 10.7 % | 15.8 % |
| \$25,000 to \$49,999 | 21.0 | 18.6 |
| \$50,000 to \$74,999 | 19.2 | 16.9 |
| \$75,000 to \$99,999 | 12.7 | 13.2 |
| \$100,000 to \$149,999 | 18.9 | 17.2 |
| \$150,000 or more | 17.5 | 18.3 |
| Total | 100.0 % | 100.0 % |
| Median household income | \$ 73,351 | \$ 72,406 |
| Education (population age 25+) | | |
| Less than high school | 5.0 % | 10.1 % |
| High school | 21.5 | 27.1 |
| Some college | 34.8 | 27.7 |
| Bachelor's degree | 25.9 | 21.7 |
| Graduate degree | 12.8 | 13.4 |
| Total | 100.0 % | 100.0 % |

Source: U.S. Census Bureau American Community Survey 2017-2021 Estimates.

H-2. Age, race and ethnicity of Milwaukee residents compared to the U.S. overall (2021)

| | Milwaukee | United States |
|--------------------------------|----------------|--------------------|
| Total population | 21,375 | 335,541,003 |
| Age | | |
| Under 5 years old | 10.6 % | 11.9 % |
| Under 18 years old | 9.4 | 12.5 |
| 65 and older | 14.6 | 13.5 |
| 30 to 39 years old | 16.4 | 13.6 |
| 40 to 54 years old | 21.4 | 18.2 |
| 55 to 69 years old | 17.5 | 18.5 |
| 70 or more years old | 10.0 | 11.8 |
| Total | 100.0 % | 100.0 % |
| Median Age | 39.5 | 38.9 |
| Race | | |
| African American | 1.0 % | 12.4 % |
| Asian American | 2.6 | 6.1 |
| Native American | 0.2 | 1.1 |
| Other race | 1.8 | 8.5 |
| Pacific Islander | 0.1 | 0.2 |
| Two or more races | 8.9 | 10.6 |
| White | 85.4 | 61.0 |
| Total | 100.0 % | 100.0 % |
| Ethnicity (of any race) | | |
| Hispanic American | 9.3 % | 19.0 % |
| Non-Hispanic | 90.7 | 81.0 |
| Total | 100.0 % | 100.0 % |

Source: U.S. Census Bureau American Community Survey 2017-2022 Estimates.

H. Allocation of City Resources and Public Services — Policies and practices

Keen Independent reviewed documents and interviewed City staff members to obtain information on how the City delivers services to members of the public.

Fees and Utility Rates

The City periodically assesses its fee structure and utility rates to ensure that they are consistent with goals and promote equity.

Fees. Every two-year budget cycle, the City adopts a master fee schedule. This schedule outlines fees for the following types of services:

- Building permits;
- Business registration;
- Downtown parking;
- Engineering plan review, inspection and permits;
- Land use applications;
- Library fines and services (e.g., document printing);
- Municipal code violation fees;
- Municipal court fees;
- Parking fines
- Police fees (e.g., gun registration, false alarm responses, body camera footage retrieval);
- Solid waste fees;
- Transportation system development;
- Tree planting and removal;
- Utilities; and
- Water system development.

Fees charged for each type of service are designed to reflect the actual cost of providing that service. The exception is when services are in conflict with City goals, in which case the City might charge a higher amount. For example, the City's Comprehensive Plan describes a goal to plant more trees in urban areas. Thus, fees for tree removal services are set higher than the cost of removing the trees so individuals are discouraged from asking for tree removal.

When individuals are not able to afford to pay the fees charged by the City for its services, they may sign up for a program that will waive or reduce fees. Eligibility to participate in this program depends on the individual's income meeting a certain threshold.

Utility rates. The City revisits its utility rates every two years. In general, the City makes a plan to adjust utility rates based on the revenue requirements for each utility to ensure that they can financially sustain operating the utilities. In this process, the City tries to minimize the extent to which classes of customers are subsidizing one another but striking a balance can be challenging.

In 2019, Utility Financial Services conduct a study of utility rates for the City. Results suggested that the City was undercharging large customers and a recommendation was made to gradually increase fees for those customers. Following this study, the City Council indicated that creating a rate structure that provides a discount to low-income and low-use customers should be prioritized.

H. Allocation of City Resources and Public Services — Policies and practices

Public input. The City encourages input from the community concerning utility rates and other fees. Appointed by the City Council, the Citizens Utility Advisory Board (CUAB) is a five-member board comprised of members of the public that focuses on capital improvement projects. It also reviews fees set for City services and is provided with updates throughout the fee setting process that they may communicate out to the community.

The City solicits additional feedback from the public on its fees and rates through sources including:

- Email lists;
- Neighborhood District Associations (NDAs);
- Social media; and
- The Milwaukee Pilot.

Services

Keen Independent focused on street maintenance and events in the assessment of City services. These areas were highlighted as particularly relevant to DEI in interviews with City staff.

Street maintenance. The Streets Division of Public Works prioritizes street maintenance based on the condition of the street. Additionally, the City hosts a pothole repair hotline and respond immediately to any messages.

A 2022 Community Engagement Survey found that 40 percent of respondents were dissatisfied with street maintenance. This indicates an opportunity for the City to better communicate their street maintenance practices and schedule to the public. Doing so might increase transparency and help residents feel like street maintenance is conducted more equitably.

Events. The City of Milwaukee hosts several events throughout the year, including:

- Arbor Day;
- CareFree Sunday;
- Earth Day;
- Umbrella Parade and Tree Lighting; and
- Winter Solstice.

The winter holiday events tend to celebrate Christmas and the City may consider exploring ways to make existing celebrations more inclusive to all cultures or potentially hosting additional events that celebrate other winter holidays.

In addition to sponsoring events, the City provides financial support to Neighborhood District Associations that host events. Engaging NDAs to help plan City events could be a way to encourage more participation of individuals from diverse backgrounds.

More information on residents' perceptions of City events can be found in Appendix I, which details results of the public virtual workshop.

APPENDIX I. Public Virtual Workshop

Keen Independent conducted a virtual workshop that solicited input from the public regarding the City of Milwaukee's diversity, equity and inclusion efforts as they relate to City services and events.

Methodology

The virtual workshop was customized to obtain City employee insights that inform Keen Independent's recommendations for the City's DEI Plan.

Question development. The study team reviewed the 2022 Milwaukee Community Survey and crafted new types of questions to supplement information from that survey. The City reviewed the questions and provided feedback that was incorporated into the final virtual workshop instrument, which was available in English and Spanish.

Distribution. The April 2023 issue of the Milwaukee Pilot contained an advertisement and QR code for the virtual workshop, which opened on April 1, 2023. The virtual workshop was also advertised on Engage Milwaukee and the City's Facebook page. Participation reminders were sent out on both channels. The virtual workshop closed on May 5, 2023. We received 190 responses with enough information to include in the analysis. About one-half of the surveys received were entirely complete. We note the individual response counts underneath each question.

Analysis. Keen Independent computed averages and frequencies for the rating scale and demographic questions and reports those throughout this appendix. Because of the limited number of employees who self-identified as Black or African American, Asian or Asian American, Hispanic or Latino, Pacific Islander and/or Native American, we combined the non-white racial and ethnic groups into one "people of color" group.

For the open-ended responses, Keen Independent reviewed each comment and noted common themes. We then selected a few representative and constructive comments pertinent to each theme to include in this appendix.

Questions

The virtual workshop asked members of the public questions within the following categories:

- Demographics;
- Overall DEI in services and City communications; and
- City-sponsored events.

This appendix is organized by each of these categories.

I. Public Virtual Workshop — Demographic characteristics of participants

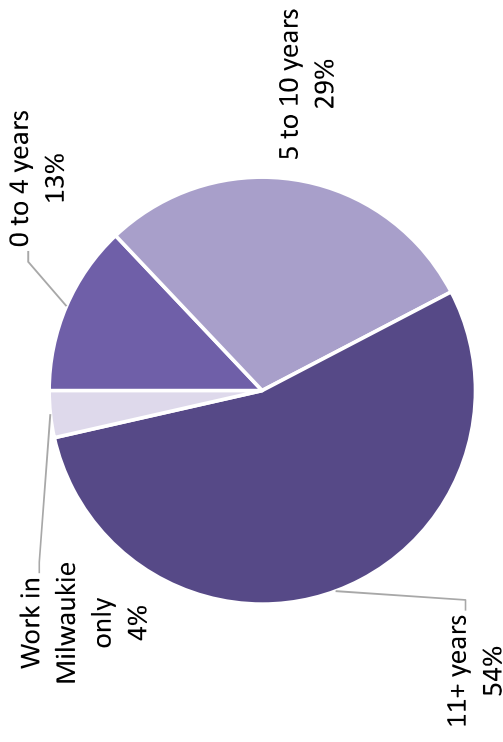
First, we describe the demographic characteristics of public virtual workshop participants.

Residency Demographics

Participants were asked to indicate how long they have lived in Milwaukee and describe their living situation.

Living in Milwaukee. The overwhelming majority (83%) of virtual workshop participants indicated that they have lived in Milwaukee for 5 or more years with more than half of respondents reporting 11 or more years of residency. About 13 percent of respondents indicated they have lived in Milwaukee for 4 or fewer years and 4 percent indicated they work in Milwaukee but did not live there.

I-1. Residency status of virtual workshop participants



Note: n = 85.

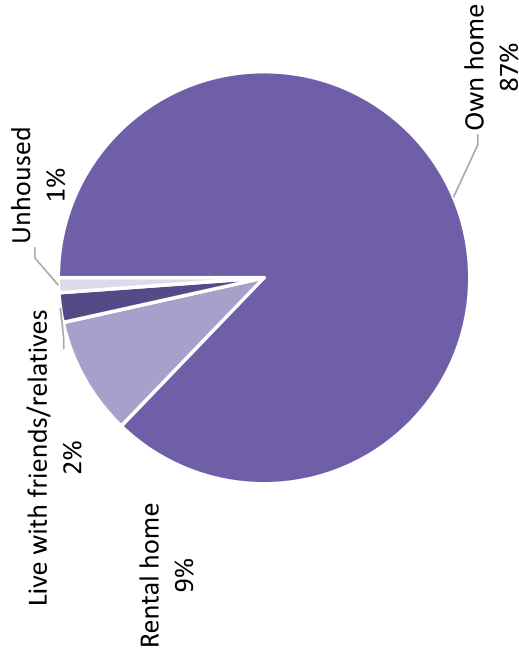
Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

I. Public Virtual Workshop — Demographic characteristics of participants

Housing status. About 85 percent of respondents indicated that they lived in a home that they own. From 2015 to 2019, about 60 percent of Milwaukee residents were homeowners.¹

Smaller numbers of participants lived in rental housing (9%) or with friends or relatives (2%) and a few participants were unhoused at the time of the virtual workshop.

I-2. Housing status of virtual workshop participants



Note: n = 86.

Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

¹ Goodman, B., & Kane, A. (2022). Milwaukee: Housing Needs Projection. ECONorthwest. https://www.milwaukeeoregon.gov/sites/default/files/fileattachments/Housing%20Affordability/meeting/123819/milwaukee_population_and_housing_memo_20220620.pdf

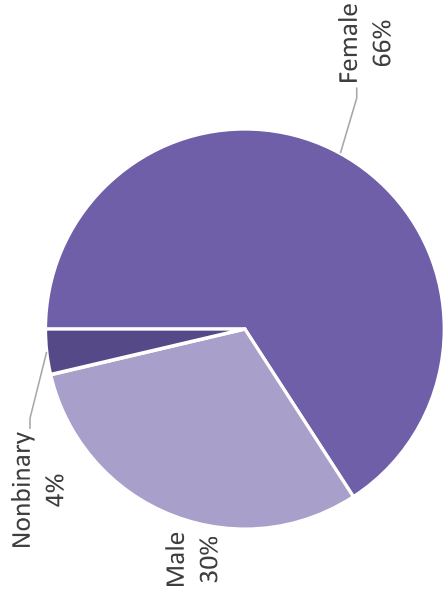
I. Public Virtual Workshop — Demographic characteristics of participants

Personal Demographics

The virtual workshop promoted participants to provide information on their gender identity, race/ethnicity, LGBTQ+ status, disability status and age.

Gender identity. Women residents were more likely than men to participate in the virtual workshop. Just under two-thirds of participants identified as female (compared to nearly 52% of the total Milwaukee population²) and 30 percent identified as male. Several participants indicated that they were nonbinary.

I-3. Gender identity of virtual workshop participants



Note: n = 82.

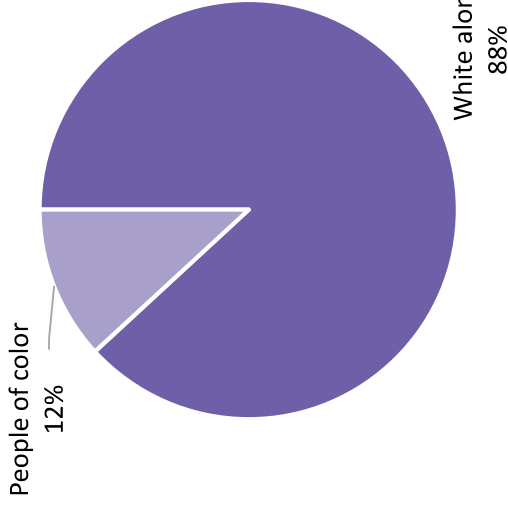
Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

² U.S. Census Bureau (2022). Population Estimates Program. <https://www.census.gov/quickfacts/fact/table/milwaukeecityoregon,US/PST045222>

I. Public Virtual Workshop — Demographic characteristics of participants

Race and ethnicity. Most virtual workshop participants who chose to identify their race and ethnicity identified as white, consistent with Milwaukee demographics overall.³ About 12 percent identified as members of racially minoritized groups.

I-4. Race and ethnicity of virtual workshop participants



Note: n = 76. A few participants selected “white” along with a racially minoritized identity, so they are included in the percentages for people of color.

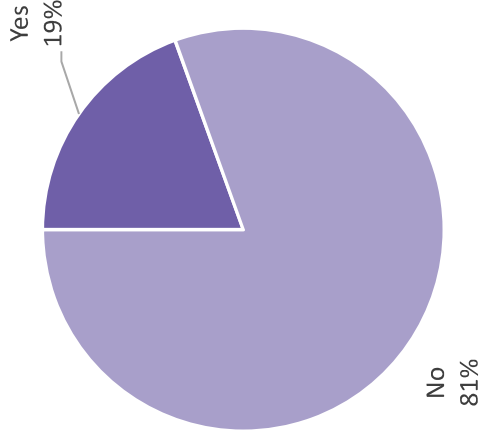
Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

³ U.S. Census Bureau (2022). Population Estimates Program. <https://www.census.gov/quickfacts/fact/table/milwaukeecityoregon,US/PST045222>

I. Public Virtual Workshop — Demographic characteristics of participants

LGBTQ+ status. About 17 percent of participants in the virtual workshop indicated that they identified as LGBTQ+. In the state of Oregon, just under 6 percent of residents identified as LGBTQ+ in a 2019 Gallup Daily tracking survey.⁴

I-5. LGBTQ+ status of virtual workshop participants



Note: n = 86.

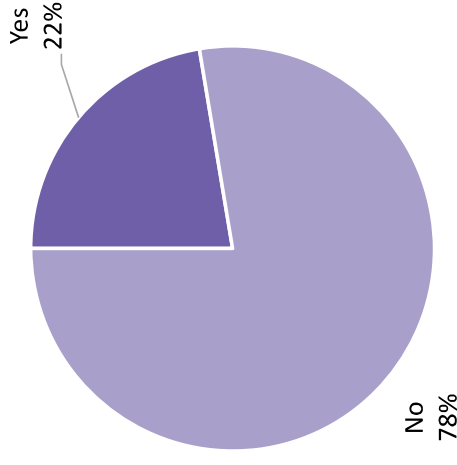
Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

⁴ Williams Institute. (2019). LGBT Demographic Data Interactive. UCLA School of Law. <https://williamsinstitute.law.ucla.edu/visualization/lgbt-stats/?topic=LGBT#density>

I. Public Virtual Workshop — Demographic characteristics of participants

Disability status. A substantial share of virtual workshop participants (20%) indicated that they have a disability. This rate is nearly twice that of persons with disabilities in the overall Milwaukee population as reported in 2021.⁵

I-6. Disability status of virtual workshop participants



Note: n = 86.

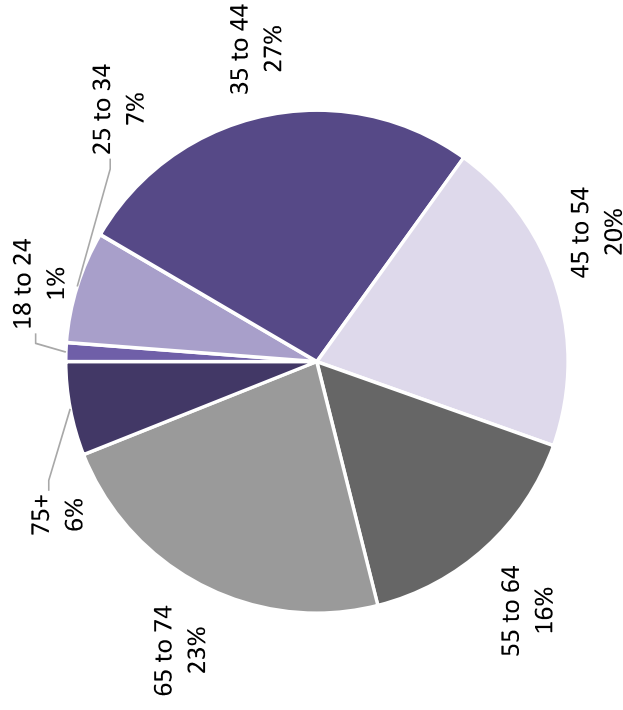
Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

⁵ U.S. Census Bureau (2022). Population Estimates Program. <https://www.census.gov/quickfacts/fact/table/milwaukiecityoregon,US/PST045222>

I. Public Virtual Workshop — Demographic characteristics of participants

Age. The largest share of virtual workshop participants fell into the 35 to 44 age group, consistent with Milwaukee demographics overall.⁶ A substantial proportion of respondents (22%) indicated they were 65 to 74 years old compared to just under 10 percent in the Milwaukee population.⁷ The virtual workshop participants skewed older than the overall Milwaukee population.

I-7. Age of virtual workshop participants



Note: n = 88.

Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

⁶ U.S. Census Bureau (2021). American Community Survey. <https://data.census.gov/table?q=Milwaukee+city,+Oregon&tid=ACSS15Y2021.S0101>

⁷ Ibid.

I. Public Virtual Workshop — Perceptions of DEI in City services and communications

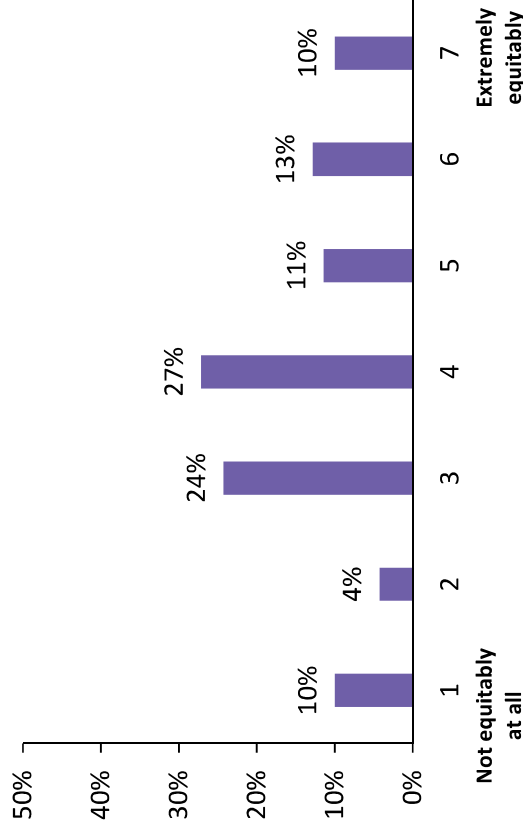
Keen Independent asked virtual workshop participants to reflect on how equitably the City provides services and the extent to which the City prioritizes DEI for its residents.

Scores Concerning Equity in Delivery of Services

The public gave numeric scores for equity in street maintenance and equity in delivery of other City services.

Public perceptions of equity in street maintenance. Virtual workshop participants provided their thoughts on how equitably the City provides street maintenance services. On a scale from 1 (not equitably at all) to 7 (extremely equitably), the average and most common rating virtual workshop participants provided was “4.”

I-8. Virtual workshop participants ratings of how equitably the City performs its street maintenance



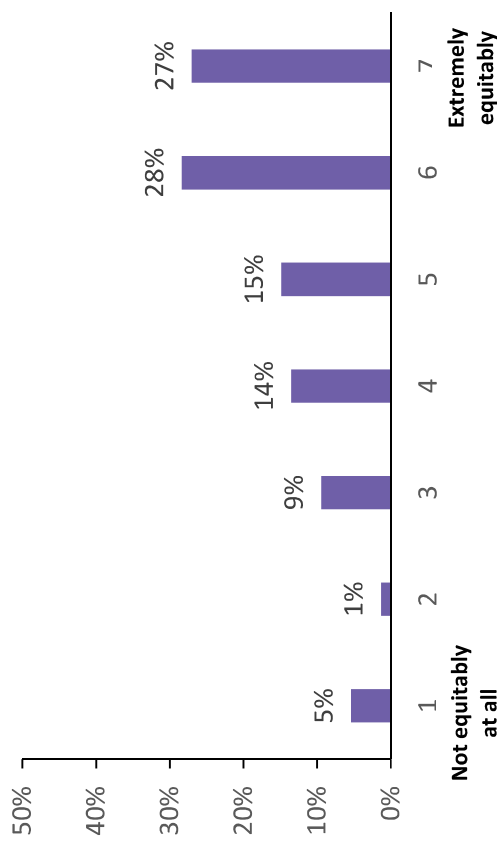
Note: n = 70.

Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

Public perceptions of equity in other services to residents. Public perceptions of equity in other services to residents. Virtual workshop participants rated how equitably the City provides other services to its residents. On a scale from 1 (not equitably at all) to 7 (extremely equitably), the average rating virtual workshop participants provided was a 5.2, with “6” being the most common rating.

Many residents rated equity in the City’s delivery of other services higher than they did for street maintenance.

I-9. Virtual workshop participants’ ratings of how equitably the City provides other services to its residents



Note: n = 74.

Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

I. Public Virtual Workshop — Perceptions of DEI in City services and communications

Open-ended Responses

Participants were asked to imagine a City that promotes diversity, equity and inclusion for its residents and describe what that looks like. A few responses mentioned safety, accessibility, mutual respect for all citizens and a City government that reflects the diversity of the population.

Additionally, participants were asked what, if anything, the City can do to more equitably serve residents.

- A few comments mentioned wanting less government involvement, particularly in the promotion of DEI.
- There were more comments offering suggestions regarding specific services.
 - A couple comments specifically mentioned adding sidewalks.
 - Others mentioned wanting more affordable housing options and fewer fees and fewer restrictions to homeowners on what they may include on their property.
 - There were few general comments wanting the City to be more responsive or accessible to residents.
 - There were a few residents who mentioned the role of the police with one commenting that training in conflict de-escalation would help serve residents more equitably.

Representative quotes containing participants' visions of an equitable City appear to the right above the horizontal line and a few with suggestions on how Milwaukee may more equitably serve residents appear below the line.

The City would assist with removing barriers for its residents so that each could enjoy equally. The City would also empower marginalized communities and amplify their voices.

Recent (<5 years) Black male Milwaukee resident

This city would work towards promoting equity, diversity, and inclusion by ensuring equal access to resources such as education, healthcare, and housing, creating inclusive public spaces, having diverse representation in government, engaging with the community, celebrating cultural diversity through events, implementing anti-discrimination policies, and providing affordable housing. Overall, the city recognizes the value of all its residents and strives to create a welcoming and inclusive environment for everyone.

Recent (<5 years) Latina Milwaukee resident

Add more sidewalks in areas that have a high number of families.

Recent (<5 years) Black female Milwaukee resident

Institute an independent equity, environmental and sustainability review for all policy proposals and applications for development or contracting initiatives.

Longtime (11+ years) white Milwaukee resident

Pay attention to other cultures and give the police training in respect. Not looking for reasons to use a gun.

Longtime (11+ years) white female Milwaukee resident

[T]he majority of taxpayers just want you to answer the phone and return a call.

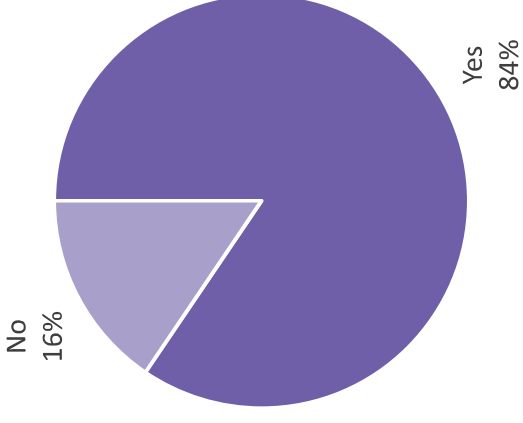
Longtime (11+ years) Asian male Milwaukee resident

I. Public Virtual Workshop — Perceptions of DEI in City services and communications

Communication of DEI Values

Numeric ratings. Participants were asked whether it was clear that the City of Milwaukee prioritizes DEI for its residents. The overwhelming majority (84%) of respondents answered “yes” to this question.

I-10. Virtual workshop participants’ indication of whether it is clear that the City prioritizes DEI for residents



Note: n = 69.

Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

I. Public Virtual Workshop — Perceptions of DEI in City services and communications

Open-ended responses. When asked how the City could communicate to residents that it values DEI, participants mentioned a range of considerations.

- Many comments expressed an “actions speak louder than words” sentiment, indicating they care more about what the City does than says.
- Several respondents commented that the City already does a good job of communicating its DEI values.
- Finally, a few comments indicated resistance to DEI-related communications from the City in general.

A few representative constructive quotes related to participants’ opinions of how the City can communicate it cares about DEI for residents appear in the column to the right.

The libraries do a fine job of encouraging all communities.

Longtime (11+ years) Milwaukee resident

Again, just have a diverse makeup of your council and community members and volunteers putting on and promoting events. Advertise for people of all makeups to join and that the more diverse the group is, the more diverse the events and initiatives. Promote that it can be part time. Don't just have events for specific races.

Recent (<5 years) Black female Milwaukee resident

Apply incentives for DEI Intelligence and Practices. Immediate review of landmarks, public art, street and public property naming and prioritize removal and/or renaming of any and all connected with prejudice, injustice, and bias.

Longtime (11+ years) Milwaukee resident

Just support your residents by making good decisions that don't discriminate against anyone, that don't place any more burdens, financial or social, on your residents. Actions speak louder than words.

Longtime (11+ years) female Milwaukee resident

Hire more [people of color].

Nonbinary Latinx Milwaukee resident

Stop alienating your long-term older residents by only listening to the 2%.

Longtime (11+ years) Milwaukee resident

I. Public Virtual Workshop — City events

Virtual workshop participants were asked to respond to several questions regarding their impressions of DEI in City-sponsored events.

Attendance at City-Sponsored Events

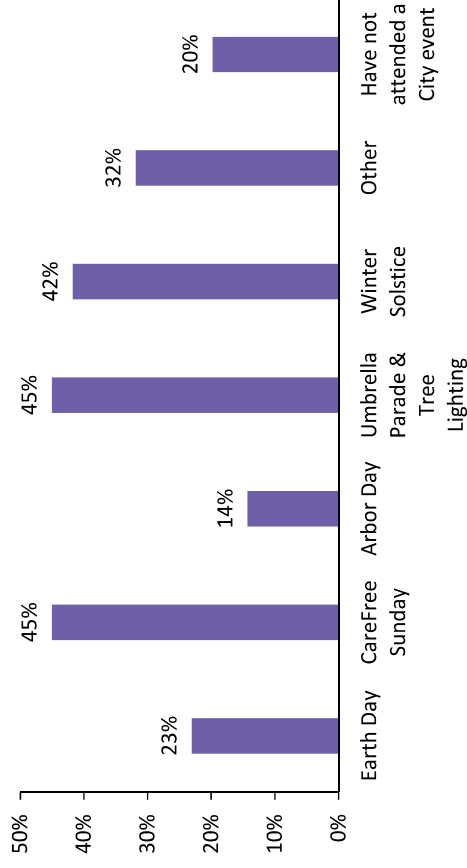
The virtual workshop presented participants with a list of City-sponsored events and asked them to indicate whether they have ever attended one of these events.

The most frequent responses were for:

- Carefree Sunday (45% of respondents said they had attended);
- Umbrella Parade and Tree Lighting (45%); and
- Winter Solstice event (42%).

Some participants selected “other” for City-sponsored events they have attended, but none indicated which event.

I-11. Virtual workshop participants’ attendance at City-sponsored events



Note: n = 70. Participants were able to select as many events as they had attended so percentages do not add to 100.

Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

I. Public Virtual Workshop — City events

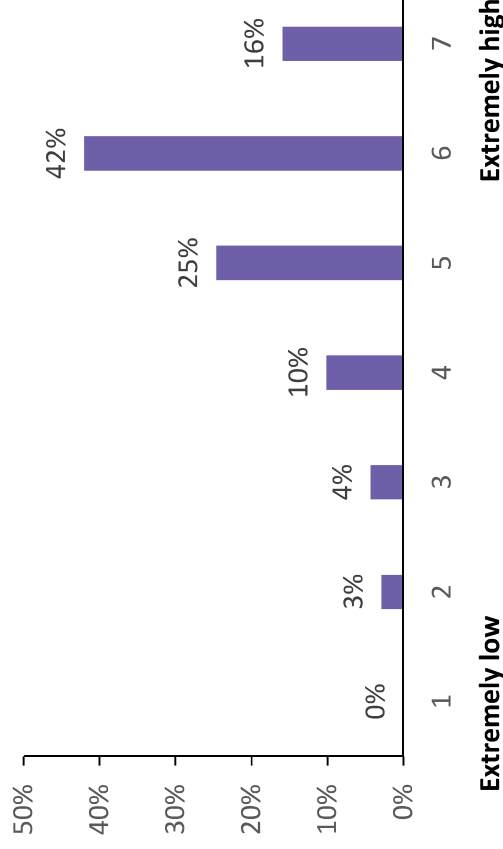
Quality of Events and Suggested Future Events

Quality of events. Virtual workshop participants were asked to rate the overall quality of the City-sponsored events they have attended on a scale from 1 (“extremely low quality”) to 7 (“extremely high quality”). The most common rating participants selected was a “6” and the average rating was 5.5.

Suggested events. The virtual workshop gave participants the opportunity to indicate the types of events they would like to see the City sponsor in the future. Suggestions participants wrote in include:

- Art festivals;
- Concerts in Milwaukee Bay;
- Creator Day;
- Events that highlight local businesses;
- Farmer’s markets;
- Fourth of July celebrations;
- Free music events;
- Kid-friendly and family events;
- Milwaukee Daze⁸;
- Multicultural events;
- Multigenerational events that include adults over 65;
- New Year’s Eve concerts;
- Parades; and
- Pride events.

I-12. Virtual workshop participants’ ratings of quality of City-sponsored events



Note. n = 72.

Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

⁸ Multiple respondents indicated they were interested in the City resurrecting Milwaukee Daze, though it was a privately run event.

I. Public Virtual Workshop — City events

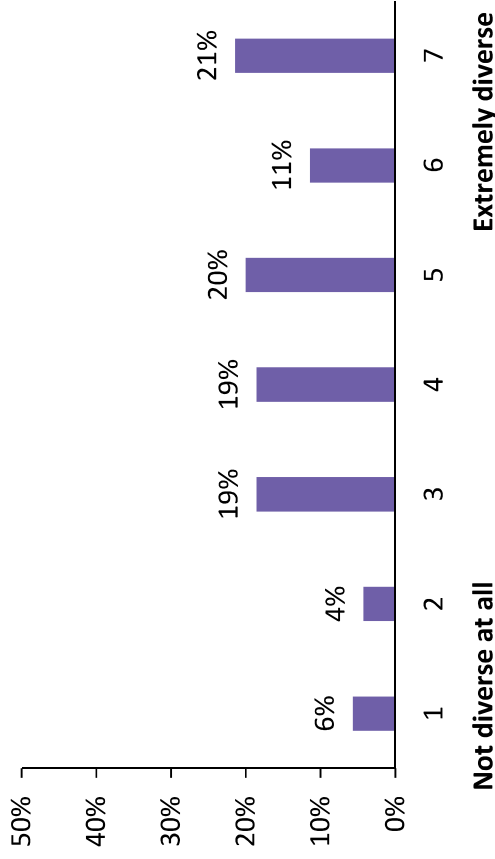
Diversity of City-Sponsored Events

Virtual workshop participants were asked about their perceptions of the diversity of City-sponsored events.

Participants rated their perception of how diverse the City's sponsored events were on a scale from 1 ("not diverse at all") to 7 ("extremely diverse"). The average rating for this question was 4.2.

Although respondents' most frequently selected rating was "7," ratings of "3," "4" and "5" were selected at nearly the same levels.

I-13. Virtual workshop participants' ratings of the diversity of City-sponsored events



Note. n = 70.

Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

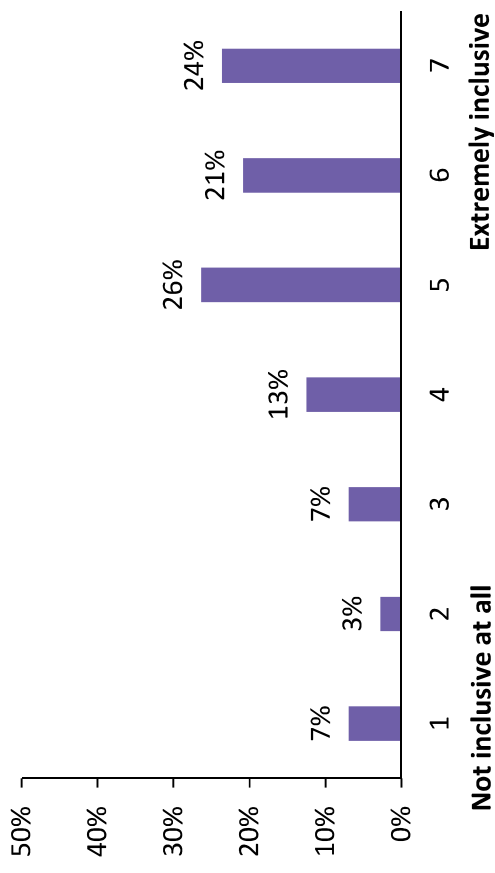
Inclusivity of City-Sponsored Events

Virtual workshop participants were asked about their perceptions of the inclusivity of City-sponsored events.

The virtual workshop prompted participants to rate their perception of how inclusive the City's sponsored events were on a scale from 1 ("not inclusive at all") to 7 ("extremely inclusive").

Respondents most frequently selected a rating of "5" for this question and the average rating was 5.1.

I-13. Virtual workshop participants' ratings of inclusivity of City-sponsored events



Note. n = 72.

Source: Keen Independent Research, City of Milwaukee Public Virtual Workshop.

I. Public Virtual Workshop — City events

Open-ended Responses

The virtual workshop prompted respondents to suggest how, if at all, the City may make its events more diverse and inclusive.

Several participants mentioned expanding the types of cultural holidays the City celebrates. Many emphasized that individuals in the community from those cultures or who celebrate those holidays should be involved in the planning of the events. A few cautioned against “pandering” to specific groups.

A selection of representative comments appears to the right.

Hold cultural events during Black History Month, Hispanic heritage month, etc.

Recent (<5 years) Black male Milwaukee resident

I don't know but you don't need to just do things to make black people or other minorities feel more welcome. It reads as pandering. The community has more black residents now which is great but just put on events with more diverse members and volunteers vs. hosting events specifically for a racial group. And I say this as a black resident.

Recent (<5 years) Black female Milwaukee resident

It's not so much that events are not diverse or inclusive, but they are not the most exciting events people want to attend. You need to get the word out when you have some major event. Maybe a banner across McLoughlin or attached to the overpass. Attention to main streets in the different regions of the cities. Right now I have to be assertive to find out about events - they are not in my face.

Longtime (5+ years) white female Milwaukee resident

Diversity should extend to various interests, hobbies, beliefs, values and cultures. This is why the Umbrella Parade works well, the focus is not limited to one type of group, which makes it open to everyone and allows for creative expression.

Longtime (11+ years) female Milwaukee resident

Ensure that cultural events of all different types are on the calendar. Ensure that people who represent that culture are part of the planning of each of these events ensure that funding for the various events is equitably dispersed across the diverse types.

Longtime (11+ years) female Milwaukee resident

I. Public Virtual Workshop — Communication of DEI values

Participants were provided with an opportunity to leave final comments relating to DEI in the City of Milwaukee.

Additional Comments

When asked to report any final comments, many participants expressed that the City already does a good job of being inclusive and welcoming.

A few participants mentioned having ongoing public dialogue would go a long way toward supporting the City's DEI goals. Additionally, a few comments focused on poverty and indicated that the City has become more inequitable along socioeconomic lines.

Finally, a few respondents indicated that they felt the long-term residents of Milwaukee were being left behind in DEI efforts.

Examples of comments are provided to the right.

Have honest conversations and allow individuals and employees to think for themselves and be supportive in their endeavors.

Imagination and practical application of these worthy goals can result in a diverse, equitable and inclusive city.

Longtime (11+ years) white female Milwaukee resident

First I think it is a plus that Milwaukee has a very diverse council, the members of which can bring their insights and experience forward into discussion of public services. Second, as a now older (and not never getting any younger) member of the community I am beginning to see the ways in which communications technologies can themselves be a barrier. For example, someone who can't hear well, or use a smart phone might simply not know what City services are available to assist.

Longtime (11+ years) white female Milwaukee resident

Remember that although our town is growing, and we have lots of new residents, we also have many families that have been Milwaukeeans for 50 and 100 years. Their interests also need to be represented.

Longtime (11+ years) multiracial male Milwaukee resident

Really want to stress how unwelcoming the city has begun to feel to people below the poverty line. It used to be a great mix, now it feels like accommodations for poor people are slowly being stripped away.

Longtime (5+ years) white female Milwaukee resident

APPENDIX J. Public Complaints Analysis

Keen Independent reviewed the process the public can use to file complaints with the City of Milwaukee and analyzed the content of the complaints from recent years. The study team received a report from the City containing 17 complaints that were filed between July 2016 and April 2022.

Public Complaints Process

Members of the public may file a complaint to the City of Milwaukee for a variety of reasons. Individuals and City employees can file a complaint through a third-party portal called EthicsPoint Anonymous Reporting by telephone (toll free hotline) or the internet. The system operates 24 hours a day, 7 days a week. EthicsPoint allows for anonymous submissions, which encourages honest and transparent reporting from the public.

Filing an online complaint. The following are steps that a member of the public can take to file a complaint with the City via the internet:

- Navigate to the City's website and click on EthicsPoint Anonymous Reporting web link;
- Select the "To Make a Report" link at the top of this web page;
- Select from a list of topics to report on, such as embezzlement, employee benefits abuses and time abuse;
- After being guided to the complaint form, write about the issue and then choose whether to remain anonymous or give one's name; and
- At the end of the report, create a password and receive a Report Key (which allows the individual to return to the portal in 5–6 business days to review any follow-up questions or submit more information).

After a report has been filed. Based on the type of violation and location of the incident, these reports are available only to specific individuals within the City and Audit Committee, such as the Chief of Police or Finance Director. These individuals are tasked with evaluating the report and are trained to keep these reports confidential.

During the investigation process, the designated investigator(s) will inspect the report. This includes talking to the parties involved and other personnel who can provide more information about the situation.

When the investigation has been completed, the investigator will use EthicsPoint to either provide clarification about the situation or inform the filer that the situation is being handled internally and no further information is needed.

If a violation occurred, a City employee may receive disciplinary action based on the City of Milwaukee policy or they may be given a warning.

J. Public Complaints Analysis

Complaint Content

Keen Independent categorized the allegations in public complaints as:

- Discrimination or harassment;
- Falsification of credentials;
- Misuse of City's resources and benefits; and
- Other complaints.

Discrimination or harassment. One complainant claimed she was pulled over by officers who assumed her vehicle was stolen because she was Black. The complainant stated that the officer stopped her because her car did not have a license plate. She explained that this was out of her control because the DMV in Oregon did not have any available appointments. The complainant described this traffic stop as racial discrimination.

Falsification of credentials. Regarding falsification of certification, one complaint alleged that a City employee claimed to have a professional certification though there was no proof the employee had that credential.

Misuse of City's resources and benefits. A majority of the complaints filed were by City employees about another employee(s) misusing City's resources and benefits. Complaints include misuse of sick time, auditing and accounting matters, improper receiving of gifts and abuse of City resources.

- **Misuse and abuse of sick time.** A number of complaints alleged that City employees misused and abused their sick time, were not punctual or took long, unauthorized breaks.
- **Auditing and accounting.** The complainant alleged that leadership was using money from one fund to improperly cover the cost of equipment that they thought should be covered by another fund.
- **Improper receiving of gifts.** A complainant alleged that two City employees received paid lunches from a consultant, which they alleged is a violation of the ethics policy as the lunches (gifts) were greater than \$50.
- **Abuse of City resources.** One complainant alleged that a City employee left a City vehicle running unattended in a parking lot while running a personal errand.

Other miscellaneous complaints. Numerous complaints were filed that were outside of the City of Milwaukee's jurisdiction. Complainants were redirected to the proper authorities. Content of these types of complaints included:

- Theft in another city;
- Reporting of a hit and run accident in the City of Milwaukee;
- Light pollution caused by police lights;
- The City's DEI training should not include religions; and
- Fraud in another county.