



Solid Waste Service Equity:

Establish clear goals and measures at the program level to improve outcomes

March 2021

A Report by the Office of the Auditor

Brian Evans

Metro Auditor

Angela Owens

Principal Management Auditor

Elliot Shuford

Senior Management Auditor

Metro Accountability Hotline

The Metro Accountability Hotline gives employees and citizens an avenue to report misconduct, waste or misuse of resources in any Metro or Metro Exposition Recreation Commission (MERC) facility or department.

The Hotline is administered by the Metro Auditor's Office. All reports are taken seriously and responded to in a timely manner. The auditor contracts with a hotline vendor, EthicsPoint, to provide and maintain the reporting system. Your report will serve the public interest and assist Metro in meeting high standards of public accountability.

To make a report, choose either of the following methods:

Dial 888-299-5460 (toll free in the U.S. and Canada)
File an online report at www.metroaccountability.org



Brian Evans

Metro Auditor

600 NE Grand Ave

Portland, OR 97232-2736

TEL 503 797 1892, FAX 503 797 1831

MEMORANDUM

To: Lynn Peterson, Council President
Shirley Craddick, Councilor, District 1
Christine Lewis, Councilor, District 2
Gerritt Rosenthal, Councilor, District 3
Juan Carlos González, Councilor, District 4
Mary Nolan, Councilor, District 5
Bob Stacey, Councilor, District 6

From: Brian Evans, Metro Auditor

Re: Audit of Solid Waste Service Equity

This report covers the audit of solid waste service equity. The purpose was to determine how the Waste Prevention and Environmental Services department incorporated equity into solid waste programs. We evaluated access to solid waste services before and after the adoption of the department's Diversity, Equity and Inclusion (DEI) work plan in 2018. Our analysis evaluated access to service for people living in census tracts with high proportions of people of color, people with lower income, people with limited English proficiency, and tracts with the highest proportion of people living in multifamily housing. We found both positive and negative changes for the four programs we reviewed.

The audit found several best practices were in place at the department level. For example, the department developed a framework and vision for racial equity. The department also made investments in organizational capacity and partnerships. While these provided a foundation, some best practices were missing at the program level.

The programs we reviewed did not have goals and measures specific for service equity. These would show what success looks like, and help prioritize future program investments. Additional data collection, evaluation, and reporting was also needed to support continuous improvement. For example, without regular analyses of service equity outcomes, negative impacts for some populations may go unnoticed. Finally, developing formal policies and procedures will help ensure that operations are carried out consistently and in alignment with goals.

We have discussed our findings and recommendations with Marissa Madrigal, COO; Roy Brower, Waste Prevention and Environmental Services (WPES) Director; and Marta McGuire, WPES Deputy Director. A formal follow-up to this audit will be scheduled within five years. We would like to acknowledge and thank all of the employees who assisted us in completing this audit.

Summary

This audit evaluated access to four solid waste services before and after the adoption of the department's Diversity, Equity and Inclusion work plan in 2018. We noted that several best practices were in place at the department level. For example, the department developed a framework and vision for racial equity, and made investments in organizational capacity and partnerships. While these provided a foundation for the department, some best practices were missing at the program level.

We found both positive and negative changes in service equity outcomes for the programs we reviewed. In places throughout the region where more people from historically disadvantaged communities live, access to a few services decreased, whereas for other services, it increased.

Our analysis evaluated access to service for people living in census tracts with high proportions of people of color, people with lower income or people with limited English proficiency. We also included tracts with the highest proportion of people living in multifamily housing.

We found three areas of best practice where additional efforts were needed to improve service equity outcomes. For the programs we reviewed, we found:

- Service equity goals and measures were not in place at the program level.
- Data-driven decision-making was underdeveloped.
- Policies and procedures were not in place.

The Regional Waste Plan included equity-specific goals and measures to track progress toward those goals. However, these were not developed at the program level. In particular, goals were not specific enough to identify the desired long-term outcomes for each program. Without refinement, the department cannot measure success, or identify where more or fewer resources are needed to improve equity.

Additional data collection, evaluation, and reporting was also needed to support continuous improvement. Finally, developing formal policies and procedures will help ensure that operations are carried out consistently and in alignment with goals.

It's important to note that the department sought to address racial equity in ways we did not evaluate in this audit. For instance, one program developed a job program for people with barriers to employment. Another program began piloting smaller waste pickup events based on community needs.

During the audit, Covid-19 and related budget constraints led to changes in some of the programs we reviewed. While some changes to programs have already occurred, the analysis in this report can still provide a framework for evaluating how programs impact the department's equity goals.

Background

Metro’s Waste Prevention and Environmental Services Department operates two transfer stations where commercial and residential customers bring solid waste. Solid waste includes garbage and recycling. The department also provides educational services; operates a recycling information hotline; issues grants; and investigates and cleans-up illegal dumping, among other services.

The department found that communities of color experience barriers to accessing recycling information, education services and household hazardous waste services. More generally, people of color in the Metro region experience the worst economic and social outcomes because of a history of exclusionary and discriminatory policies. To address these problems, both Metro and the department engaged in several efforts in recent years to promote racial equity, and to ensure equitable services for communities of color.

The agency-wide Strategic Plan to Advance Racial Equity, Diversity and Inclusion was approved in 2016. In that plan, racial equity was defined as “when race can no longer be used to predict life outcomes, and outcomes for all groups are improved.” In 2018, the department updated its Diversity, Equity and Inclusion (DEI) work plan. The next year, Metro adopted the latest version of the Regional Waste Plan, which placed an emphasis on racial equity.

Exhibit 1 Key Metro and department actions supporting equity



Source: Auditor’s Office analysis of equity-related plans

While racial equity has been a clear focus in its planning efforts, the department has also discussed *service* equity. The department had not specifically defined service equity, but the concept was discussed in the Regional Waste Plan and the DEI work plan. For instance, a value within the Regional Waste Plan is to “provide excellent service and equitable system access.” The 2018-22 DEI work plan also articulated a vision of service equity:

“...We meaningfully involve people of color on our team and in our decision-making, and **provide our services equitably so that everyone benefits from a healthy community and healthy environment.**”

Equity best practices distinguish between equity and equality and note that equality is about sameness, while equity is about fairness. Meaningful institutional change to repair historic and systemic inequities requires a strategic and holistic approach. They are applicable to different levels within an organization. For example, leadership needs to operate with urgency and accountability. It is also important to articulate a vision and develop a shared understanding. The Government Alliance for Racial Equity outlines the following six-part approach:

- Use a racial equity framework to articulate a vision and develop shared understanding
- Operate with urgency and accountability
- Build organizational capacity
- Be data-driven to measure progress toward goals
- Implement racial equity tools to change policies, programs, and practices that perpetuate inequities

This audit focused on practices that need to be in place at the program level. These practices included identification of service equity goals and measures, data-driven decision making, and policies and procedures.

For the analysis, we compared program service areas to the census tracts in the region that had higher proportions of people of color, people with lower income, and people with low English proficiency. We also included people living in multifamily housing.

It's important to note that the department sought to address racial equity in ways we did not evaluate in this audit. For instance, one program developed a job program for people with barriers to employment. Another program began piloting smaller waste pickup events based on community needs.

Our analysis included programs related to proper disposal of hard-to-handle waste and ensuring the livability of the region. The programs included:

- The **Regional Illegal Dumping Patrol (RID)** investigates and cleans up illegal dumping in the region.
- **Household Hazardous Waste Mobile Collection Events (mobile events)** provide opportunities for residents to bring household hazardous waste to mobile collection events. Metro also accepts these materials at its transfer stations.
- **Community Enhancement Grants (CEG)** enhance and rehabilitate areas around the region's public and private solid waste transfer stations.
- The **Disposal Voucher** program provides either funding or vouchers to cover the costs for disposing waste collected at community clean-ups.

Exhibit 2 Estimated Annual Program Costs in Calendar Year 2019

Program	Estimated Annual Cost
Regional Illegal Dumping Patrol	\$1.7 million
Household Hazardous Waste Mobile Collections Events	\$254,000*
Disposal Voucher	\$83,000
Community Enhancement Grants	\$21,000*

*Estimate provided by Waste Prevention and Environmental Services

During the audit, Covid-19 and related budget constraints led to changes in some of the programs we reviewed. We were informed the Disposal Voucher program was eliminated. Mobile events were put on hold. The process to update some agreements related to the CEG program was also delayed. While some changes to programs have already occurred, the analysis in this report can still provide a framework for evaluating how programs impact the department's equity goals.

Results

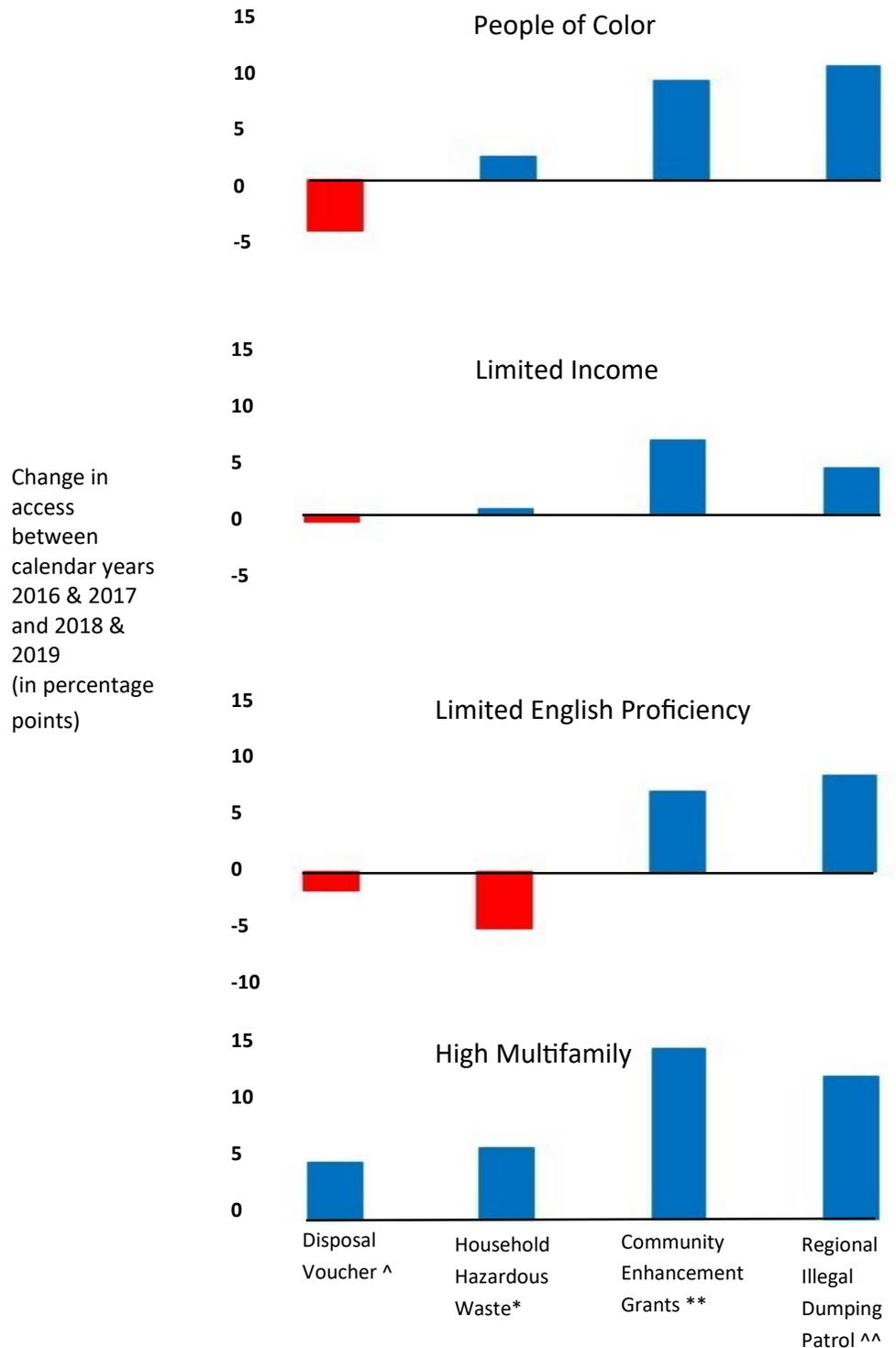
We evaluated access to solid waste services before and after the adoption of the department's DEI work plan in 2018. We found both positive and negative changes in service equity outcomes for the programs we reviewed. In places throughout the region where more people from historically disadvantaged communities live, access to a few services decreased, whereas for other services, it increased.

Negative changes meant access to the department's services may have become less equitable. For instance, fewer areas with a high proportion of people of color and people with limited English proficiency were within a five-minute drive of a Disposal Voucher clean-up event. At the same time, people in these groups were also more likely to have barriers to accessing department services.

Our analysis evaluated access to service for people living in census tracts with high proportions of people of color, people with lower income or people with limited English proficiency. Metro identified these tracts for regional transportation planning. We also included tracts with the highest proportion of people living in multifamily housing. These tracts are collectively referred to as Equity Areas in this report.

Programs had different service equity outcomes. The Disposal Voucher program had decreased access for three Equity Areas. The mobile events had a decrease for one area and increases for the others, though two areas only saw small increases. Both the CEG program and the RID Patrol had increases in all four Equity Areas. Please see Exhibit 3 on the next page for the results for each program.

Exhibit 3 Access for some Equity Areas varied



Access definitions

- ^ Five-minute drive time to a clean-up event
- * Ten-minute drive time to a clean-up event
- ** Tract was in an area eligible to receive grant funding
- ^^ Per-capita calls for service were in the top 75% of all census tracts in the region

Source: Auditor's Office geographic analysis of program service locations and data provided by the Metro's Research Center

We noted that several best practices were in place at the department level. For example, the department developed a framework and vision for racial equity. The department also made investments in organizational capacity and partnerships. While these provided a foundation for the department, some best practices were missing at the program level.

To improve program service equity outcomes, the department needed to develop or strengthen best practices. The programs we reviewed did not have goals and measures specific for service equity. These would show what success looks like, and help prioritize future program investments.

Additional data collection, evaluation, and reporting was also needed to support continuous improvement. For example, without regular analyses of service equity outcomes, negative impacts for some populations may go unnoticed. Finally, developing formal policies and procedures will help ensure that operations are carried out consistently and in alignment with goals.

Service outcome equity varied

Service equity outcomes for each program varied, which meant the department was at risk for not improving service equity for some historically marginalized populations. For example, access to Disposal Voucher events decreased for most of the Equity Areas. Also, census tracts where more people with limited English proficiency live saw a decrease in service accessibility for both Disposal Voucher and mobile events.

We also found some promising results. Access for all of the services in our review increased for tracts where more people live in multifamily housing (e.g. apartments). The department and others we spoke with identified these residents as lacking equitable service levels. Specifically, some apartments have inadequate recycling containers and few options for disposal of bulky waste. Our analysis showed there was increased access to dispose bulky waste through the Disposal Voucher program for people in areas with higher concentrations of multifamily housing, assuming they had the means to transport this waste.

In the absence of clearly defined service equity goals and measures for each program, we used existing data and our own measures to evaluate service equity. They included:

- RID Patrol—the number of reported illegal dumping cases per 1,000 people in each census tract;
- CEG—whether or not individual census tracts were eligible to receive grant funding;
- Disposal Voucher program—tracts within a five-minute drive time to clean-up events;
- Mobile events—tracts within a ten-minute drive time to clean-up events.

These measures were not intended to be the only relevant data or measures related to service equity for these programs. They provide one possible way

to evaluate service equity. Using different data and different measures could have shown different results.

Also, census data has been noted to have limitations when it comes to historically marginalized populations. One critique is that it is too generalized for some races or ethnicities. Combining different groups into the same category may not provide enough specificity about the barriers faced within these categories.

The potential to show different results underscored the importance of identifying appropriate service equity goals and measures, and incorporating data analysis at the program level. Without these in place, the department may miss opportunities to improve service equity.

Strengthen best practices to improve service equity outcomes

We found three areas of best practice where additional efforts were needed to improve service equity outcomes. For the programs we reviewed, we found:

- Service equity goals and measures were not in place at the program level.
- Data-driven decision-making was underdeveloped.
- Policies and procedures were not in place.

Clear goals and measures, data-driven decision making, and formal policies and procedures set expectations for Council, department staff, regional partners, and the public. They can also be helpful in setting expectations for funding priorities and decision-making.

Exhibit 4 Improvements were needed across the programs we reviewed

Program	Service equity goals and measures	Data-driven decision making	Policies and procedures
Regional Illegal Dumping Patrol			
Community Enhancement Grants			
Disposal Voucher			
Household Hazardous Waste Mobile Collection Events			

Partially in place

Not in place

Source: Auditor Office analysis of program documents, interviews, and data

Some programs required more effort to prioritize service equity than others. For example, RID Patrol, CEG, and Disposal Voucher services were demand-based and carried out in partnership with other jurisdictions or groups. This reduced the department's ability to influence equity outcomes by itself.

There were examples where department staff and leadership wanted to make changes to improve service equity, but were challenged because of staff capacity and limited resources. For example, the mobile events team wanted to update procedures for selecting sites, but Covid-19 had reduced staff capacity. Challenges were likely to continue given the current budget environment. However, changes at the program level could improve service equity outcomes. Evaluating performance can also help the department identify ways to prioritize the programs that provide more equitable services.

Define service equity goals and measures at the program level

The Regional Waste Plan included equity-specific goals. It also included measures to track progress toward those goals. However, neither were developed at the program level. In particular, goals were not specific enough to identify the desired long-term outcomes for each program. Few measures were in place and they lacked corresponding targets. Without refinement, the department cannot measure success or identify where more or fewer resources are needed to improve equity.

Service equity goals and measures were not in place for the Disposal Voucher and CEG programs. One Plan measure was to calculate the share of CEG dollars awarded to projects that benefit marginalized communities. However, it did not yet include a desired target or baseline. Without those details, the program cannot determine if it is doing too much or not enough.

Two programs identified goals and measures but those elements lacked specificity. For example, the RID Patrol sought to clean sites in three days, but this was not equity-specific. The Plan had a goal to clean up sites and prioritize communities with greatest need. A measure in the Plan was "tons of dumped waste overall and in the most impacted communities." However, it was not clear how the most impacted communities would be identified. Desired tonnage ratios were also not provided, nor was it clear how they would be used to assess service equity.

Without clear goals or measures, it will be a challenge for the RID Patrol to effectively prioritize efforts and resources. For instance, it is not clear if it should prioritize reducing overall tonnage or focus on the most impacted communities. This program sought to increase equity in different ways including a job training program for people with employment barriers. New efforts increased the number of potential program goals.

The mobile events provide a good example of how powerful more clearly defined goals can be. This program had goals and measures in place for event advertising but not for site selection. Clarity was important because the program was piloting new efforts to improve service equity. One effort

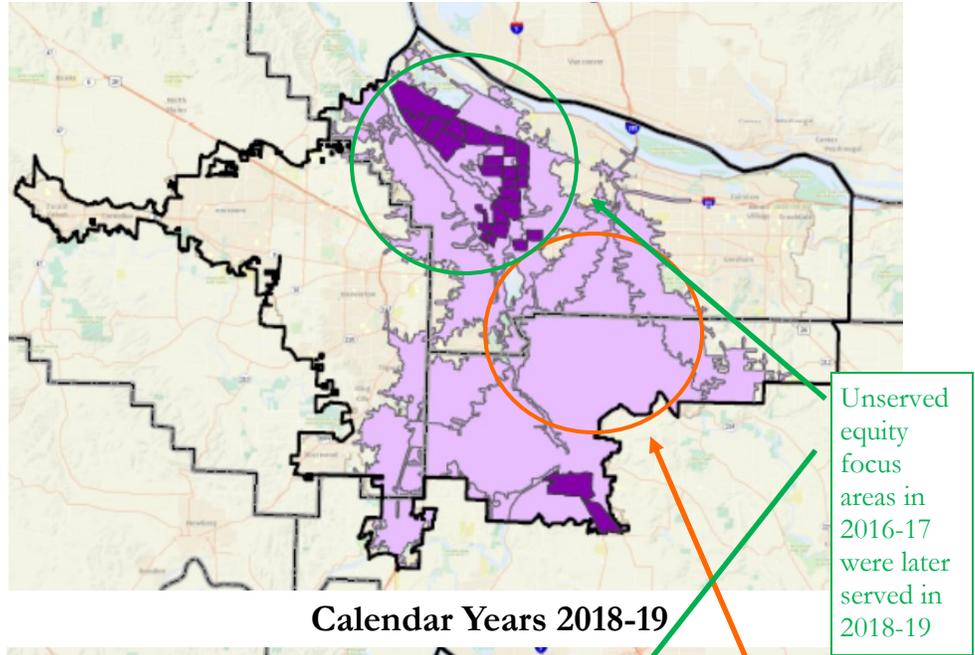
sought to site events in areas that were previously underserved. Decisions for these new locations were made in partnership with a department community outreach and engagement specialist. We found this resulted in increased access for some of the region's Equity Areas.

The Plan highlighted actions to provide convenient, accessible, and equitable collection of hazardous waste from households. This was to be prioritized for "communities with greatest need." Although the department was working with community organizations to identify needs, it was not clear how communities with greatest need was defined or what service levels would be required to provide service equity.

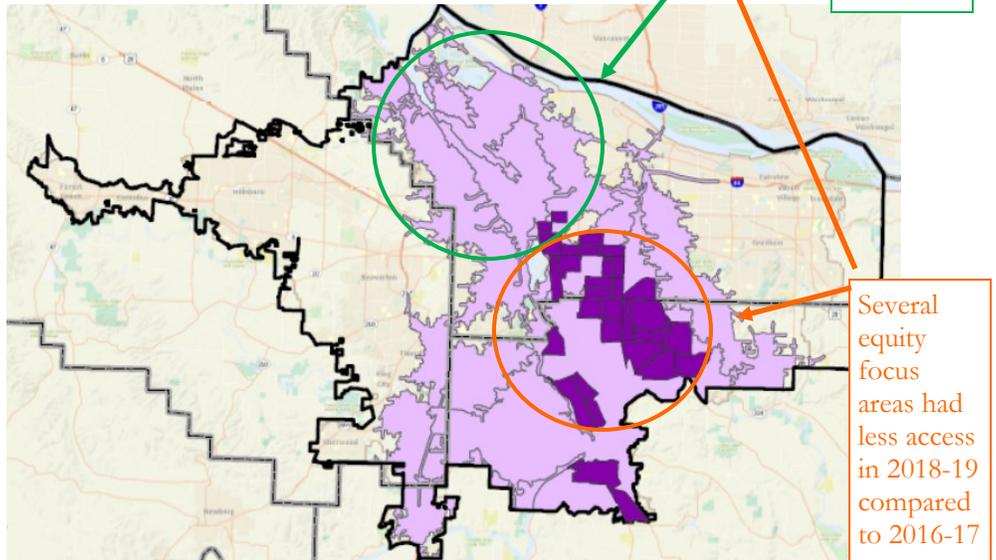
Historically mobile events were provided to ensure access for those who live farther away from Metro's two transfer stations. They were sited outside of a 20-minute drive from Metro's transfer stations. In 2019, the department was more specific about how it identified which communities had the greatest need. This shift had a positive impact for some communities that were previously unserved. Please see Exhibit 5 on the next page for a summary of the analysis.

Exhibit 5 Access to Household Hazardous Waste Mobile Collection events changed when goals were more specifically defined

Calendar Years 2016-17



Calendar Years 2018-19



20-minute drive to Metro Transfer Station
 Unserviced Equity Focus Areas

Source: Auditor Office analysis of event locations, Metro Equity Focus Areas, and drive-time data from Metro's Research Center

Although access increased for some Equity Focus Areas within a 20-minute drive from a Metro transfer station, it also decreased for others. Because these efforts were being piloted, it will be important for the department to specify service equity goals and measures to manage tradeoffs and ensure improvements continue. That would also allow the department to identify programs or service areas where additional efforts are needed.

Implement data-driven decision making

Equity evaluation and reporting was underdeveloped for the programs we reviewed. As a result, there were opportunities for the department to better use data for decision-making.

Although the RID Patrol and Disposal Voucher program collected and reported service data, it was not consistently used to evaluate the equity of services provided. For example, the department produced reports that summarized actions by the RID Patrol, but these reports did not highlight which communities were or were not accessing services. Department leadership and staff were aware of the potential inequities in the Disposal Voucher program and tried to identify ways to make the program more equitable, but there were not regular evaluations of data to demonstrate the extent of the inequities. This information could have been useful in making program changes to better align with desired equity outcomes.

The CEG program recently made an improvement that could better facilitate data-driven decision-making. In FY 2017-18, the program began tracking if grantees were culturally-specific community based organizations as a way to evaluate equity. However, this data was not used to evaluate potential program changes.

The mobile events program could also improve its use of data. The program used data to make advertising decisions and mapped site locations to help ensure geographic equity. Although conversations took place about past events and community needs, event data was not regularly used to identify service-equity gaps for communities with the greatest need.

We also found that the department needed better cost and output data. This information could help determine the cost-effectiveness of different ways to accomplish similar activities, including those intended to improve equity outcomes. For instance, we calculated the cost per ton for ensuring proper disposal of garbage. These estimates showed it was much less expensive per ton to ensure that garbage is not illegally dumped and cleaned up by RID Patrol. Accordingly, preventing waste and working to curb illegal dumping is more cost effective.

We also calculated the costs per ton for the two ways Metro worked to ensure household hazardous waste was properly disposed. These estimates indicated the mobile collection events may be less expensive on a per ton basis than disposal of these materials at a hazardous waste facility. Additional analysis would be needed to confirm the size of the cost differences, but our estimates indicate increasing mobile events could be a cost-effective way to ensure proper disposal.

We found cost and output data were difficult to obtain. They raised questions about which costs were included. Strengthening the department's cost and output data is key to understanding service cost-effectiveness. As the department continues to develop its analytical capacity, it will be important to include cost information to help evaluate program efficiency and effectiveness.

Develop policies and procedures

Policies and procedures help set expectations and formalize the requirements for improving service equity outcomes. These were not developed for the programs we reviewed. Without policies and procedures, there was a risk that current efforts to provide more equitable services would continue inconsistently or not at all.

Given the range of department services, policies and procedures could come in many forms. Examples include program evaluation criteria, procedures for obtaining community feedback, or procedures for assessing service gaps. Formality can range from something as simple as a checklist to a fully developed procedures manual.

Programs lacked policies and procedures to set expectations for service equity. For example, equity was not a factor in Disposal Voucher program criteria or the applicant approval process.

The funding criteria for the CEG allowed for a variety of activities that may not necessarily increase service equity. Local jurisdictions controlled most of the grant committees. This reduced Metro's authority over those decisions. Changing the funding criteria is one option to increase service equity. This may require Metro Council action and engagement with local jurisdictions.

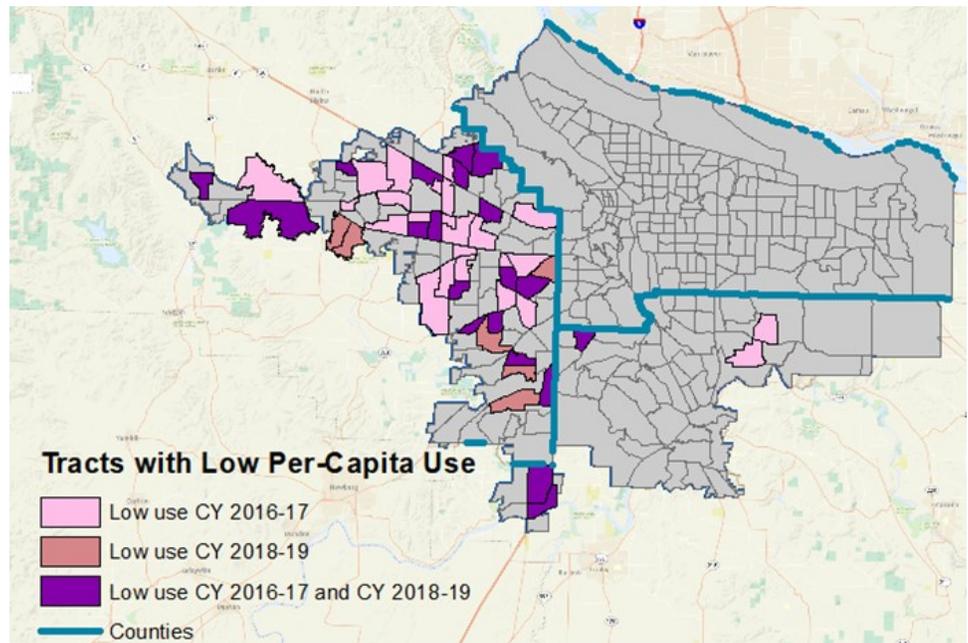
Another option would be for the department to work with local jurisdictions to ensure they improve service equity outcomes through the local grantmaking process. Changing the inter-governmental agreements (IGAs) is one way to accomplish this. Although the department began exploring options to amend IGAs to better ensure equity, at the time of the audit such changes had not been made.

There were consistent service gaps in the western portion of the region for the RID Patrol. Without a formal process to analyze the gaps, the department is less likely to know the extent and distribution of the gaps and why they occurred.

The RID Patrol provides an on-demand service. This meant people needed to be aware of the services provided before accessing them. Lack of awareness could have been one reason for the gaps. Staff recognized the importance of an outreach plan, but had not developed one.

We were told some local jurisdictions elected to clean up sites on their own. This could have reduced use in some areas. Lack of use could also be due to other reasons. For example, if the department finds that some historically marginalized communities are less likely to request government services because of the historic and current injustices caused by governments, then the department may want to consider other ways to ensure this service is delivered equitably.

Exhibit 6 Low-use tracts for RID Patrol were concentrated in the western portion of the region



Source: Auditor's Office geographic analysis of RID program data

The mobile events team developed detailed annual planning documents for the site selection process. However, procedures for making the selections were not written. Site selection required assessment of site availability, safety, size, and geographic distribution. The program also worked with community partners and department community engagement specialists to inform site selection.

Given the complexity of the siting decisions and new efforts to meet community needs, procedures were essential to ensure these efforts are carried out consistently. Similarly, because of the economic challenges created by Covid-19, developing program-level goals and measures, using data-driven decision making, and developing policies and procedures will help realize the department's vision of providing services equitably.

Recommendations

To improve service equity outcomes at the program level, Metro's Waste Prevention and Environmental Services department should:

1. Develop clear goals, measures, and targets for service equity within programs to set expectations.
2. Formalize policies and procedures to ensure equity expectations are carried out.
3. Develop reliable cost and output information for its programs.
4. Analyze cost and output data to identify the programs that drive continuous improvement in service equity.

Scope and methodology

The purpose of this audit was to determine how the Waste Prevention and Environmental Services department incorporated equity into solid waste programs between 2015 and 2019. To do this, the audit had two objectives:

- Determine how equity considerations impacted how solid waste services are delivered
- Determine which best practices could improve service equity outcomes

To develop the audit objectives, we reviewed department and agency plans, policies and procedures, and other documents related to solid waste services and equity. We also reviewed best practices and related audits conducted by other audit organizations.

We attended meetings and interviewed Metro employees to identify concerns and opportunities for improvement. We conducted preliminary analyses of department and program data to provide context and identify trends.

To determine how equity considerations impacted the delivery of solid waste services, we selected four programs for review. We selected programs based on risks identified in early audit work, program size, program history, type of services provided, and level of control Metro had over the program.

We compared services provided in calendar years 2016 and 2017 to services provided in 2018 and 2019 for each of the four programs. When available, we used program data to identify service locations. We also calculated service locations using addresses and mapping software.

We used our professional judgment to define access. As such, methodologies applying different approaches may result in different conclusions.

For the Disposal Voucher program, we defined access as any census tract within a five-minute drive from an event location. For Household Hazardous Waste Mobile Collection events, access was defined as a census tract within a ten-minute drive of an event. RID Patrol use was defined as number of cases per 1,000 people in census tract. Finally, Community Enhancement Grant access was defined as whether or not a census tract was eligible to receive Community Enhancement Grant funding because of its position relative to the grant enhancement area boundaries.

To identify service equity, we mapped access for each program against Metro's Equity Focus Areas, as developed by the Research Center. We also used Research Center data to identify areas in the region high in multifamily housing. We calculated this as any census tract where the percentage of multifamily housing to total housing was in the top 25 percent. We mapped service access for each program against the results.

We used data from several sources to identify service costs and benefits including PeopleSoft, Weighmaster, and different sets of program data. For the Disposal Voucher, Household Hazardous Waste, and RID Patrol services, this included estimating cost per ton.

To determine which best practices could improve service equity outcomes, we developed assessment criteria using three bodies of work: internal controls, performance management, and racial equity frameworks and practices. We used this criteria to identify opportunities for improvements within the programs we reviewed.

Specifically, we used the Government Accountability Office (GAO) to identify standards for internal controls. We used general guidance for performance management from the GAO and Government Finance Officers Association as well as the Performance Management Framework from the National Performance Management Advisory Committee. We also reviewed racial equity frameworks, tools, and practices identified by other local governments, the Government Alliance on Race and Equity, and the Coalition of Communities of Color.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit was included in the FY 2019-20 audit schedule.

Management response

Memo



Date: Friday, March 5, 2021

To: Brian Evans, Metro Auditor

From: Marissa Madrigal, Metro Chief Operating Officer
Roy Brower, Waste Prevention and Environmental Services Director

Subject: Management response to Solid Waste Service Equity Audit

Thank you for the opportunity to respond to your audit of Solid Waste Service Equity. Equity is an important value for Metro and the Waste Prevention and Environmental Services department (WPES). We appreciate your time and attention on this critical subject and your recommendations for how we can continue to improve in this area.

We appreciate that you noted that the department has best practices in place at the department level, including development of a framework and a vision for racial equity in the 2030 Regional Waste Plan. We agree that we have more work to do to ensure that these goals and values are embedded in each of our programs. To successfully implement the vision of service equity from the Regional Waste Plan, we need to ensure that services and facilities are equitably accessible to all.

With regards to the second recommendation of the audit, formalize policies and procedures to ensure equity expectations are carried out, we will implement Metro's racial equity framework and adapt it for use in our department as we implement the 2030 Regional Waste Plan. This framework will help us to incorporate Metro's equity values into our decision-making processes, use tools, analysis and methods to eliminate exclusionary practices and adopt department-wide policies, practices and tools to support implementation of the racial equity framework at the program level.

In the following pages we provide our responses to your recommendations, organized by each of the four recommendations and the four WPES programs assessed in the audit.

Recom- mendation Number	Do you agree with the recommen- dation?	If agree, what are the proposed plans for implementing solutions? If disagree, please provide reasons.	Proposed timetable for implementation?
1. Develop clear goals, measures and targets for service equity within programs to set expectations.	Yes	<p><u>Overall response</u></p> <p>As was noted in the audit, “The Regional Waste Plan included equity-specific goals and measures to track progress toward those goals. However, these were not developed at the program level. In particular, goals were not specific enough to identify the desired long-term outcomes for each program. Without refinement, the department cannot measure success, or identify where more or fewer resources are needed to improve equity.” To address this, the department is working on developing equity-related goals, indicators and measures at the program level. Here is an overview of that implementation for each of the programs included in the audit.</p> <p><u>Regional Illegal Dumping (RID) program</u></p> <p>The RID program will define service equity for its services then develop clear goals, measures and targets in alignment with the 2030 Regional Waste Plan and for data-driven equity decision making. The program will update its data collection tools and systems for any identified data collection needs. However, available resources for the development of new data collection methods or systems may impact proposed timetable for implementation. While current program capacity does not allow for this work, we plan to further develop these goals and measures after additional program staff are added to meet current demand for services.</p> <p><u>Household Hazardous Waste (HHW) Mobile Collection Events program</u></p> <p>The department is currently in the process of reinstating a limited number of HHW mobile collection events for 2021 which will prioritize communities of color and other underserved communities. These events will be scheduled to the extent that they can be done safely following current Covid-19 protocols by conducting risk assessments. These events also focus on priority materials such as sharps and medications. We have assembled a project team to meet immediate service gaps for most vulnerable communities in our region. This team will also develop clear goals, measures and targets related to service equity with input from partners and stakeholders.</p>	<p>FY 23-24 (RID)</p> <p>Summer/ fall 2021 (HHW)</p>

		<p><u>Community Enhancement Grant program (CEG)</u></p> <p>The CEG program will define service equity for the grant program, determine implications of the revised tonnage allocation process, and determine the program’s ability to meet 2030 Regional Waste Plan Goal 13 on program expansion. In order to develop clear goals, measures and targets for service equity, the program will coordinate with Metro Council, Office of Metro Attorney, Metro DEI Program and local jurisdictions to determine whether proposed new goals, measures and targets require Metro Code changes. If Metro Code changes are necessary, it will likely lengthen the proposed timeline. The successful completion of the above work assumes additional staffing resources.</p> <p><u>Disposal Voucher program</u></p> <p>The department opted to sunset the Disposal Voucher program in 2020 due to budget reductions and the need to address service equity concerns as identified by multiple stakeholders. Metro will work with local government, community partners and other stakeholders to re-envision how we can most effectively provide disposal assistance prioritizing our most vulnerable, underserved communities. Ultimately, meeting these goals may or may not include a voucher program and are likely to be addressed through a multipronged approach including options such as rate assistance, increased bulky waste multifamily service standards and/or through contracts/partnerships with community based organizations to support targeted bulky waste collection. Either way, we will develop clear goals, measures and targets for service equity during this process.</p>	<p>FY 23-24 (CEG program)</p> <p>Initial scoping FY 21-22 pending budget and staff capacity (disposal assistance)</p>
<p>2. Formalize policies and procedures to ensure equity expectations are carried out.</p>	<p>Yes</p>	<p><u>Overall response</u></p> <p>We will implement Metro’s racial equity framework and adapt it for use in our department as we implement the 2030 Regional Waste Plan. This framework will help us to incorporate Metro’s equity values into our decision-making processes, use tools, analysis and methods to eliminate exclusionary practices and adopt department-wide policies, practices and tools to support implementation of the racial equity framework at the program level.</p> <p><u>Regional Illegal Dumping (RID) program</u></p> <p>Once the steps for the first recommendation are complete, program policies and procedures will be updated to reflect the service equity goals and measures.</p> <p><u>Household Hazardous Waste Mobile Collection Events program</u></p> <p>Policies and procedures will be developed as part of the effort described above. We will update or develop new policies and procedures to ensure equity outcomes are met.</p>	<p>FY 23-24 (RID)</p> <p>FY 21-22 (HHW)</p>

		<p><u>Community Enhancement Grant program</u> Once the steps for the first recommendation are complete, program policies and procedures will be drafted to reflect the service equity goals and measures. Proposed timeline is dependent on the completion of action 1 above.</p> <p><u>Disposal Voucher program</u> See item 1.</p>	<p>FY 23-24 (CEG)</p> <p>Initial scoping FY 21-22 pending budget and staff capacity (disposal assistance)</p>
3. Develop reliable cost and output information for its programs.	Yes	<p><u>Overall response</u> We appreciate the connection made in the audit between recommendation #3 and #4, for developing, then analyzing cost and output information for programs will help to identify programs that drive continuous improvement in service equity. Therefore, responses for this recommendation are focused on how the programs will build capacity for this analysis work.</p> <p><u>Regional Illegal Dumping (RID) program</u> The RID Program will need to evaluate the potential data points available for each program service and the available data collection methods and tools. The program’s ability to develop reliable cost and output information will depend on the data collection system and staffing resources to develop new tools or upgrade the current data collection system.</p> <p><u>Household Hazardous Waste Mobile Collection Events program</u> This will be addressed through the strategic plan, logic modeling and budget process noted above.</p> <p><u>Community Enhancement Grant program</u> The CEG will consider what consistent data can be feasibly collected from all the grant programs, including those administered by local jurisdictions. This will require coordination and input from WPES analytics staff, grant administrative staff from local jurisdictions and associated budget considerations from local jurisdictions to do this work. The program’s ability to develop reliable cost and output information will also depend on tonnage allocation impacts to the program, data collection system and tools, and program staff capacity and resources.</p> <p><u>Disposal Voucher program</u> See item 1. For any program updates or new program development, a collaborative approach engaging community partners and other stakeholders will be utilized to develop cost and output metrics that are relevant to our service equity goals. Ongoing analysis of cost and output data will be integrated into program implementation.</p>	<p>FY 23-24 (RID)</p> <p>Fall 2021/ winter 2022 (HHW)</p> <p>FY 23-24 (CEG)</p> <p>Initial scoping FY 21-22 pending budget and staff capacity (disposal assistance)</p>

<p>4. Analyze equity-specific cost and output data to identify effective programs and drive continuous improvement.</p>	<p>Yes</p>	<p><u>Overall response</u> As noted in our response to recommendation 2 above, we will implement this recommendation largely through implementation of Metro’s racial equity framework and adaptation for use with the 2030 Regional Waste Plan. Evaluation of equity-specific cost and output data is a key element of a racial equity framework if it is used regularly to guide decision-making and continuous improvement to department programs.</p> <p><u>Regional Illegal Dumping (RID) program</u> The RID program will develop procedures for analyzing program data to determine which services are effective and drives continuous improvement as well as evaluate the costs of the outputs. The program will develop methodology and procedures with WPES Analytics staff to ensure program metrics align with the 2030 Regional Waste Plan. The program will also consider an annual review of data collection and analysis to ensure the use of the best available data and most accurate analysis.</p> <p><u>Household Hazardous Waste Mobile Collection Events program</u> A program-specific evaluation plan will be developed and put into practice as the new equity-focused HHW Mobile Collection Events program is more fully implemented. This may include participant and Census data and community participant feedback to ensure that the program is meeting service equity goals.</p> <p><u>Community Enhancement Grant program</u> After the above actions are complete, the program will develop procedures for analyzing program data to determine which services are effective and drives continuous improvement as well as evaluate the costs of the outputs. The program will develop methodology and procedures with WPES Analytics staff to align with the 2030 Regional Waste Plan, Metro Code and how/whether it might be used to compare to other agency grant programs. The program will also consider an annual review of data collection methods and data points to ensure the use of best available data and accurate analysis. This will depend on local jurisdiction willingness to collaborate, the need for Metro Code changes, and Metro staff capacity.</p> <p><u>Disposal Voucher program</u> See item 1. Evaluation will be key component of any programming developed to provide disposal assistance, whether that be a refined disposal voucher program or an entirely new program. Process and outcomes based evaluation will be utilized to ensure that the program is meeting service equity goals.</p>	<p>FY 24-25 (RID)</p> <p>Winter/spring 2022 (HHW)</p> <p>FY 24-25 (CEG)</p> <p>Initial scoping FY 21-22 pending budget and staff capacity</p>
---	------------	---	---



Office of the Metro Auditor
600 NE Grand Avenue
Portland, Oregon 97232
503-797-1892
www.oregonmetro.gov