

Emergency Management

**Mass Shelter Equity Lens: Guidance**

A guidance tool to ensure an equitable Mass Shelter Plan for everyone everywhere in Multnomah County in need of shelter

during a mass displacement event such as a catastrophic earthquake.

Have questions or want more information about these tools? Please contact:

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*As new information becomes available, The Lens will be updated to reflect current authorities, definitions and our understanding of how to best plan for mass sheltering.*

**Purpose**

The purpose of the Multnomah County Mass Shelter Equity Lens is to ensure lawful and equitable integration of people with access and functional needs, and under-represented and under-served communities, throughout the Multnomah County Mass Shelter planning process and the plan itself. (See page 4 for definitions of equity, access and functional needs, under-represented and under-served communities, and more.)

**Background**

Equity is a keystone value for Multnomah County. The Office of Diversity and Equity (ODE) was established to hold the County accountable to ensure access, equity, and inclusion in our services, policies, practices, and procedures. ODE developed the Empowerment and Equity Lens to move the value of equity into action. The Empowerment and Equity Lens is a transformative quality improvement tool used to advance planning, decision-making, and resource allocation leading to more equitable policies and programs. The work we are engaged in at Multnomah County is part of a national and international movement that supports human rights for all.[[1]](#footnote-1)

Providing equity guidance for the entire Mass Shelter Project Team is a primary objective of the Access and Functional Needs (AFN) Task Force. To achieve this, the AFN Task Force tailored the county’s Empowerment and Equity Lens to our Mass Shelter Plan. The result is a customized Mass Shelter Equity Lens, referred to as **The Lens** in this document. Each Project Team (including the Advisory Team and all Task Forces) will apply The Lens as we develop elements of the Plan. The AFN Task Force will review our draft deliverables and provide feedback. They can also provide technical assistance as needed. For example, the AFN Task Force can provide clarity on the intent of a question or they can provide examples that pertain to your section of the Plan.

Applying The Lens encourages us to ask difficult questions, explore creative solutions, be honest with ourselves, and be transparent about what we are able to do, our limitations, and the possible impacts of our decisions. The Lens will help us identify:

* Individuals and communities impacted by our decisions;
* Benefits and burdens different populations may experience from our decisions; and
* Actions we can take to minimize burdens.

Authorities

Developing an equitable Mass Shelter Plan aligns with our County values, is the right thing to do, and is our legal mandate. Some individuals, specifically those with access and functional needs and from under-served or under-represented communities, may require additional assistance before, during, or after disasters. Federal civil rights law and policy require nondiscrimination for certain populations, including on the bases of race, color, national origin, religion, sex, age, disability, English proficiency, and economic status. The following federal authorities identify protected classes and define our legal responsibility to make reasonable modifications to our policies, practices, and procedures to ensure equitable outcomes for everyone.

According to **Civil Rights Act of 1964 Tile VI** and its amendments, no person shall, on the grounds of race, color, national origin, sex, religion, age, disability, English proficiency or economic status, be denied the benefits of, be deprived of participation in, or be discriminated against in any program or activity receiving federal financial assistance. Emergency personnel conducting assistance functions, including the distribution of supplies, the processing of the applications, and other relief and assistance activities, shall perform their work in an equitable and impartial manner without discrimination.[[2]](#footnote-2)

The **Fair Housing Act** (Title VIII of the Civil Rights Act of 1968) and the **Architectural Barriers Act of 1968** require equal sheltering opportunities for people with disabilities. This includes sheltering people with disabilities in the most integrated setting appropriate to the needs of the person, which in most cases are the same setting people without disabilities enjoy. This also pertains to the selection of accessible sites for the location of general population emergency shelters, the construction of architecturally compliant mass care shelters and elements, and required physical modifications to ensure program accessibility in existing facilities.[[3]](#footnote-3)

The **Americans with Disabilities Act of 1990** (ADA) prohibits discrimination on the basis of disability. Under **Title II, III and V of the** **ADA,** emergency programs, services, activities, and facilities must be accessible to people with disabilities. This requires that emergency management make reasonable modifications to policies, practices, and procedures when necessary to assure the inclusion of the needs of people with disabilities in: preparation; notification; evacuation and transportation; sheltering; first aid and medical services; temporary lodging and housing; transition back to the community; clean up; recovery; and other emergency- and disaster-related programs, services, and activities.[[4]](#footnote-4)

**Title IX of the Education Amendments of 1972** prohibits discrimination on the basis of gender.[[5]](#footnote-5)

**Section 504 of the Rehabilitation Act of 1973** states individuals with a disability shall not be excluded from, denied the benefits of, or be subjected to discrimination under any public program or activity.[[6]](#footnote-6) **Section 508** of the **Rehabilitation Act** requires federally funded electronic and information technology to be accessible to people with disabilities, including employees and members of the public.[[7]](#footnote-7)

The **Individuals with Disabilities Education Act of 1975 (IDEA)** ensures services to children with disabilities. IDEA governs how public agencies provide early intervention, special education and related services to infants and toddlers (birth to two years), and children and youth (3 to 21 years) with disabilities.[[8]](#footnote-8)

The **Age Discrimination Act of 1975** prohibits discrimination on the basis of age.[[9]](#footnote-9)

Amendments to the **Stafford Act of 1988** address nondiscrimination of protected classes. **Section 308** protects individuals from discrimination on the basis of race, color, religion, disability, nationality, sex, English proficiency, sexual orientation or economic status in all disaster assistance programs. **Section 309** applies these nondiscrimination provisions to all private relief organizations participating in response and recovery efforts. [[10]](#footnote-10)

The **Post-Katrina Emergency Management Reform Act, (PKEMRA),** which is **Title** **VI of the Department of Homeland Security Appropriations Act, 2007**, made changes – some appearing in the **Homeland Security Act** and some in the **Stafford Act** – directing FEMA, *among other things*, to:

• Develop guidelines to accommodate individuals with disabilities;

• Add disability and English proficiency to the list of provisions requiring nondiscrimination in relief and assistance activities;

• Provide transportation assistance for relocating and returning individuals displaced from their residences in a major disaster;   
• Provide rescue, care, shelter, and essential needs assistance to individuals with household pets and service animals as well as to such pets and animals, referred to as the **Pets Evacuation and Transportation Standards Act of 2006 (PETS Act**)

• Provide case management assistance to identify and address unmet needs of victims of major disasters.[[11]](#footnote-11)

# Passed in 2010, 21st Century Communications and Video Accessibility Act (CVAA) updated federal communications law to increase the access of persons with disabilities to modern communications. The CVAA makes sure that accessibility laws are brought up to date with 21st century technologies, including new digital, broadband, and mobile innovations.[[12]](#footnote-12)

Definitions

Equity Lens terminology is defined below to provide a shared framework of understanding for the entire project team.

**Whole Community**

The federal government is committed to including the whole community as integral partners in planning for disasters and other emergencies. A whole community focus refers to enabling the participation in preparedness activities to a wider range of players from the private and nonprofit sectors, including nongovernmental organizations and the general public, in conjunction with the participation of federal, state, tribal and local government partners in order to foster better coordination and working relationships.[[13]](#footnote-13) Participation of the whole community requires equitable access to preparedness activities and programs without discrimination and consistent and active engagement and involvement in all aspects of planning. For inclusive planning to be successful, individuals who are often underrepresented or excluded must be actively involved.[[14]](#footnote-14)

The following definitions include communities who are part of the whole community.

**Under-served[[15]](#footnote-15)**

Under-served means people and places that historically and currently do not have equitable resources, access to infrastructure, healthy environments, housing choice, etc. Due to historical inequitable policies and practices, disparities may be recognized in both access to services and in outcomes.

**Under-represented[[16]](#footnote-16)**

Under-represented recognizes that some communities have historically and currently not had equal voice in institutions and policy-making and have not been served equitably by programs and services.

**Access and Functional Needs[[17]](#footnote-17)**

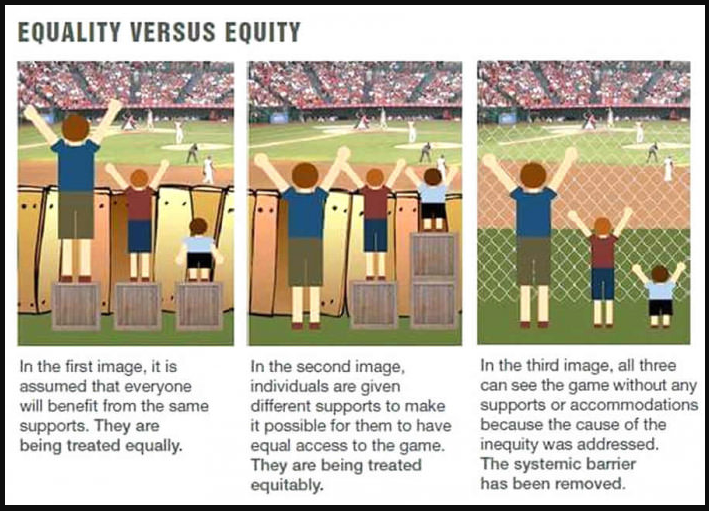
Participation of the whole community requires equal access to preparedness activities and programs without discrimination; meeting the equal access and functional needs of all individuals; and consistent and active engagement and involvement in all aspects of planning. Many individuals with equal access and functional needs, including those with and without disabilities can be accommodated with actions, services, equipment and modifications including physical/architectural, programmatic, and communications modifications.

**CMIST**[[18]](#footnote-18)

CMIST – Communication, Maintaining Health, Independence, Support/Services/Self-Determination, and Transportation – is a framework for integrating considerations for at-risk individuals with access and functional needs into emergency planning. The CMIST Framework provides a streamlined approach to inclusive emergency planning through a broad set of common, cross-cutting, function-based and access-based needs irrespective of specific diagnoses, statuses, or labels.

**Equity**[[19]](#footnote-19)

Equality is not equity. Equality involves the uniform distribution of goods and services. Equity involves trying to understand and give people what they need to prevent disparate impact across our communities. Translated into emergency management, not everyone needs the same thing to meet life safety or other basic needs before, during or after an emergency. When we consider equity, we are considering the whole community with an eye towards individuals with access and functional needs (including those with CMIST needs) and towards communities who have been historically under-served or under-represented. For example, some individuals may need extra assistance to: travel to a shelter, complete shelter registration forms, or remain independent in a shelter. There is no “one-size-fits-all”. People do not all require the same assistance and do not all have the same needs. In addition, an individual with access and functional needs who also has been under-served or under-represented is likely to experience a disproportionate impact from a mass displacement event. As illustrated below, limited resources may need to be distributed differently in order to create equitable outcomes for everyone.[[20]](#footnote-20)

**Applying The Lens**

The Lens includes 17 shelter-specific questions for us to consider as we develop key deliverables for the Plan. Each question is accompanied with 1) an explanation of why the question is important to this project, and 2) two or more examples of how that question may be realized in this Plan. Though there are many ways each question can be applied to mass shelter, we strived to identify at least one example related to each shelter operational area.

Who Does The Lens Apply To?

The Lens will help us consider the many types of stakeholders impacted by a catastrophic earthquake. Stakeholders include:

* *Recipients of shelter services*: Anyone in need of shelter or services offered by the shelter, including: individuals living in, working in, or traveling through the county, and people from other areas needing to be relocated to the county for refuge after the event;
* *Shelter staff:* Trained Red Cross staff (paid and volunteer), county staff, community groups, spontaneous volunteers, and others;
* *Government employees:* Those supporting shelter operations; and
* *Individuals with access and functional needs, and from under-served or under-represented communities*: Individuals needing additional assistance to access or receive services in a general shelter. Some, but not all, of the reasons a person may need additional assistance include: (listed alphabetically, and in no order of priority)

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| Age: child, elder  Behavioral health  Caregiver  Criminal record  Cultural sensitivity  Dietary needs | Disability[[21]](#footnote-21)  Ethnicity  Family  Gender expression[[22]](#footnote-22)  Gender identity[[23]](#footnote-23) | Health condition (acute or chronic)  Homelessness  Immigration status  Lack transportation | Limited English proficiency  Low educational attainment  Person of color | Pet  Poverty  Pregnancy  Race  Refugee | Religion/spirituality  Sexual orientation[[24]](#footnote-24)  Sexual violence  Single parent/guardian  Substance use disorder  Supervision needed |

Three Simple Steps

1. **Train.** The AFN Task Force trains the Planning Team on The Lens.
2. **Apply**. Each Planning Team group considers the 17 Lens questions as they develop a draft section of the Plan. Each group completes The Lens worksheet and submits to MCEM*.*
3. **Update**. The AFN Task Force reviews Lens worksheets and draft sections of Plan, and provides feedback. Each group updates their drafts, as needed and as able.

**MASS SHELTER EQUITY LENS**

When applying The Lens, consider each stakeholder group’s physical, spiritual, emotional, racial, ethnic, and cultural contexts.

Consider that every person entering a shelter has experienced some form of trauma before or during the event that brought them to the shelter.

Questions are in numerical order for reference only, not in order of prioritization. Each team determines which questions are most relevant to their unique situation.

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| **PEOPLE:** Refers to individuals, groups, communities or populations. This includes shelter staff and anyone needing resources at a shelter. Consider which communities are impacted by this decision, policy, plan, et cetera. Who wins? Who loses? | | | | |
|  | **Questions.** | | **Why this is important.** | **Examples of how this can look in a Shelter Plan.** |
| 1 | Does the decision support all community members, including people with access and functional needs and under-served and under-represented communities? If not, who does the decision not support? Why? | | The whole community is impacted by our decisions. However, history has shown individuals with access and functional needs and from under-served and under-represented communities have been disproportionately burdened by disasters. Planning *with* the communities we are planning *for* will help ensure the needs of everyone impacted are addressed in this Plan. | * Recruit planning team members that represent the whole community, especially people with access and functional needs and from under-served and under-represented communities. * Plan meals in shelters that accommodate special dietary needs. |
| 2 | How are shelter residents and staff positively and negatively affected by this decision? | | Our decisions will impact shelter staff and residents. Shelter staff may include county employees, community based organizations and volunteers. Typically, people who come to a shelter have exhausted all other resources. Often that includes people living in or on the edge of poverty. Historically, roughly 20% of emergency shelter residents have access and functional needs. Consider how this decision will balance the needs of staff and residents. | * Provide counseling services for shelter residents as well as staff. * Include residents in developing community rules for congregate living. |
| 3 | What are the different barriers people have to access this facility, service or resource? | | Different communities experience different barriers, and what works for one group will not work for everyone.[[25]](#footnote-25) Using the C-MIST framework will help identify a wide range of solutions that ensure services and resources are accessible to everyone. C-MIST stands for: Communication (written and spoken), Medical Needs, Independence, Supervision, and Transportation. Consider how this decision will remove or minimize those C-MIST barriers. | * C: Develop written materials at the third grade reading level. * M: Provide personal aides. * I: Provide electricity for motorized wheelchairs. * S: Identify an area for child care. * T: Coordinate accessible transport to/from the shelter. |
| 4 | Are people traumatized or re-traumatized by this decision? | | Everyone displaced by a disaster has experienced some level of loss and trauma. Furthermore, some people will be more impacted by a disaster than others. In other words, something that feels like a pebble dropped on my foot might feel like a boulder to someone else. Creating a shelter environment that is actively non-violent, collaborative, welcoming, and supportive will help minimize a traumatic experience. | * Dress security/enforcement officers in de-militarized uniforms when possible, or have accompanied by plain-clothed personnel. * Establish a message board for all important information, even information that was spoken (trauma affects memory), and provide translation services to communicate those messages. |
| 5 | How does this decision account for people's need to be productive, independent and feel valued? | | How people are treated in a shelter can compound a negative experience or can help lighten the impact of the disaster that brought them there. Empowering shelter residents to be independent and productive in a shelter will help them feel valued and will increase individual and collective resiliency. Consider ways residents can be empowered at every human touch point in the shelter. | * Develop Just-In-Time training modules for shelter residents, so they can support shelter operations. * Provide translators and picture boards. |
| **PLACE:** Refers to a physical space comprised of social relationships and meaning.Consider the impact place makes, for the better or worse. | | | | |
|  | **Questions.** | **Why this is important.** | | **Examples of how this can look in a Shelter Plan.** |
| 1 | How does this decision minimize exposure to hazards? | Life safety is top priority. Every decision must minimize everyone’s exposure to hazards to every extent possible. | | * Conduct a damage assessment before opening a shelter. * Appoint a shelter safety officer in charge of identifying hazards and unsafe conditions. |
| 2 | How does this decision account for emotional and physical safety? | Life safety is top priority. Every decision must support physical safety. Emotional safety is intimately linked to well being, and is therefore also high priority. Shelter location, environment and policies must support physical and emotional safety. | | * Co-locate people and animals in shelters when possible. * Communicate clearly and widely that all people, including undocumented individuals and all ethnic and religious groups, are welcome and safe in the shelter. |
| 3 | How are public resources and investments distributed equitably? | Though plans and policies may attempt to deliver benefits *equally*, the impact across individuals and communities may not be *equitable* based on the cumulative experience of current and past inequitable policies and investments. If this context is not considered, plans and policies may do more harm than good.[[26]](#footnote-26) Every community will not need the same resources. The more equitable approach is to balance available resources with need. | | * Identify shelters near to the most vulnerable populations. * Designate some shelter restrooms as gender neutral. |
| 4 | Does the decision meet the needs identified in the vulnerability analysis? If not, what is not being addressed, and why? | The vulnerability analysis identifies areas subject to hazard exposure, a demographic profile including social vulnerability, and the location of response resources, including potential shelters. This analysis will help to identify potential shelter sites in areas with limited exposure to hazards in close proximity to vulnerable communities. It will also help the Emergency Operations Center (EOC) predict shelter staff, service and resource needs. | | * Describe the demographics around each shelter in the shelter profile, including the share of population with disabilities and other access and functional needs (including CMIST needs). * Identify shelters in areas that could become “islands”, cut off from response services. |

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| **PROCESS:** Refers to policies, plans and decision making structures. Consider methods to engage and build relationships to create a more inclusive, respectful and aware process. *How* is just as important as the *What* and *Why.* | | | |
|  | **Questions.** | **Why this is important.** | **Examples of how this can look in a Shelter Plan.** |
| 1 | Can this procedure or policy be modified reasonably to meet an individual’s need around disability or language translation in accordance with legal authorities identified in the Background section of this document? | Federal Civil Rights Laws require state and local government to provide equal access to services and activities by providing reasonable accommodations to people with disabilities and people who do not have English as their primary language. Procedures and policies need to be flexible to meet our legal, moral and mission-driven imperative to meet an individual’s need around disability or language translation. | * Provide aids, ramps, and accessible bathrooms and showers. * Provide interpreters and picture boards. * Translate public information, signage and shelter materials in multiple languages. |
| 2 | How are we meaningfully including or excluding people in the planning process, especially people with access and functional needs and/or under-served and under-represented communities? | Designing a process that is inviting to community leaders to participate in decision making from the onset will lead to a participatory process that is authentic. Informal community leaders often participate in government planning processes on a volunteer basis. Often that means they cannot attend frequent meetings during regular business hours. Explore creative ways to engage community volunteers in the planning process. | * Schedule planning meetings that are accessible, including, meeting location, facility, time, and language. * Offer a variety of ways to participate in the planning efforts (full participation, ability to only participate at key decision making points, in-person meetings, webinars, conference calls, etc.) |
| 3 | What policies, terminology and social relationships contribute to barriers, especially for people with access and functional needs and from under-served and under-represented communities? | Government programs have historically been designed for a dominant culture, which can inhibit successful participation by other cultural communities. Policies and terminology need to be designed so they are accessible to a wide range of stakeholders.[[27]](#footnote-27) | * Spell out acronyms and define terminology. * Invite non-traditional partners to join the planning team. |
| 4 | What sheltering processes or services may be traumatizing, or re-traumatizing, and how do we improve them? And what processes promote healing and recovery? | An experience in a shelter may traumatize or re-traumatize people, including but not limited to those who are undocumented, people who have been institutionalized and people with mental health needs. Task Forces need to consider ways to minimize trauma that may be created by a shelter location, facility type, dormitory environment, or shelter service. | * Develop a training module for shelter staff on trauma-informed care. * Create a policy that a home address is not required to enter a shelter. |

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| **POWER:** Refers to who is making decisions and who is impacted by those decisions. Similar to process-related questions, consider methods to engage and build relationships to create a more inclusive, respectful and aware process. *How* is just as important as the *What* and *Why.* | | | |
|  | **Questions.** | **Why this is important.** | **Examples of how this can look in a Shelter Plan.** |
| 1 | What are the barriers to developing a shelter plan that is equitable and accessible for all communities? | Project timeline and lack of funding are two barriers experienced by the entire project team. In addition, your Task Force may find it difficult to get the right people to the table and to consistently participate. This may be especially true for community-based organizations and others historically not participating in emergency management processes and programs. Consider creative ways your Task Force can engage the whole community, especially non-traditional partners. | * Ask MCEM for translation services at planning meetings when needed. * Ask the AFN Task Force for technical assistance if you don’t understand a Lens question. |
| 2 | Who is accountable? | We know that in emergency situations we will rely on existing systems to get the job done. When identifying roles and responsibilities, determine if a government, private or community partner already provides that service or action. Consider how that entity can be empowered to implement that action or service in a mass displacement event. If that entity does not have the needed authority or resources, how can we boost their ability and/or capacity to ensure equitable implementation? | * Identify training needs. * Look for ways government can coordinate with private and community partners to best deliver the service or action. |
| 3 | Is there a system in place to check and balance the decision-making structure, in both the planning process and in shelter operations? | Whole community implementation requires flexibility and refinement based on lessons we learn throughout the planning process and during shelter operations.[[28]](#footnote-28) A decision-making process with feedback loops ensures decisions are not made in a vacuum. Our goal is to create a decision-making process that receives and reviews feedback and then refines the Plan, or shelter operation, as needed. | * Establish a process for planning team members to provide feedback to the Advisory Team. * Establish a clear and simple process for shelter residents to provide feedback to shelter staff about shelter operations. |
| 4 | How is this (issue, policy, or decision) shifting the power dynamics to better integrate voices and priorities of people with access and functional needs, and under-served and under-represented communities? | In a congressional testimony, FEMA Administrator Craig Fugate testified “… we fully recognize that a government-centric approach to disaster management will not be enough to meet the challenges posed by a catastrophic incident. That is why we must fully engage our entire societal capacity....”[[29]](#footnote-29) To the extent possible, involve the whole community in your decision making process. | * Develop Standard Operating Procedures for translating public alerts, including coordination with community partners to ensure wide-spread distribution to Limited English Proficiency populations. * Ask community leaders, especially for access and functional needs, under-served and under-represented communities, for suggestions on how to best communicate with their community. |

1. https://multco.us/diversity-equity [↑](#footnote-ref-1)
2. https://www.fema.gov/media-library-data/20130726-1829-25045-8202/civil\_rights\_title\_vi\_directive.pdf [↑](#footnote-ref-2)
3. FEMA (2010) Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters. Found on website: https://www.fema.gov/pdf/about/odic/fnss\_guidance.pdf [↑](#footnote-ref-3)
4. http://www.ada.gov/ada\_title\_II.htm [↑](#footnote-ref-4)
5. https://www.fema.gov/pdf/emergency/nrf/nrf-authorities.pdf [↑](#footnote-ref-5)
6. http://www.hhs.gov/ocr/civilrights/resources/factsheets/504.pdf [↑](#footnote-ref-6)
7. https://www.fema.gov/pdf/emergency/nrf/nrf-authorities.pdf [↑](#footnote-ref-7)
8. http://idea.ed.gov/ [↑](#footnote-ref-8)
9. https://www.fema.gov/pdf/emergency/nrf/nrf-authorities.pdf [↑](#footnote-ref-9)
10. http://www.fema.gov/civil-rights-program [↑](#footnote-ref-10)
11. https://www.fema.gov/pdf/emergency/nrf/nrf-authorities.pdf [↑](#footnote-ref-11)
12. https://www.fcc.gov/consumers/guides/21st-century-communications-and-video-accessibility-act-cvaa [↑](#footnote-ref-12)
13. National Preparedness Goal, First Edition, September 2011, A-2. [↑](#footnote-ref-13)
14. This definition of whole community is taken from correspondence with FEMA on January 19, 2016. [↑](#footnote-ref-14)
15. This definition of under-served community comes from the City of Portland’s Climate Action Plan, and can be found on website: https://www.portlandoregon.gov/bps/article/531984 [↑](#footnote-ref-15)
16. This definition of under-represented community comes from the City of Portland’s Climate Action Plan, and can be found on website: https://www.portlandoregon.gov/bps/article/531984 [↑](#footnote-ref-16)
17. This definition of access and functional needs is taken from correspondence with FEMA on January 19, 2016, and is based on *Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters*, November 2010, p. 8 and *Comprehensive Preparedness Guide 101 Version 2.0*, November 2010, Appendix B, p. B-1. [↑](#footnote-ref-17)
18. CMIST definition by [Kailes, J. I., & Enders, A. (2007). Moving beyond “special needs” A function-based framework for emergency management and planning. Journal of Disability Policy Studies, 17(4), 230-237.](http://www.jik.com/KailesEndersbeyond.pdf) as referenced by the US Department of Health and Human Services Public Health Emergency website, found at:http://www.phe.gov/Preparedness/planning/abc/Pages/afn-guidance.aspx [↑](#footnote-ref-18)
19. FEMA (2010) Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters. Found on website: https://www.fema.gov/pdf/about/odic/fnss\_guidance.pdf [↑](#footnote-ref-19)
20. Adapted from an image found at The City of Portland’s Office of Equity and Human Rights*’* website: https://www.portlandoregon.gov/oehr/article/449547 [↑](#footnote-ref-20)
21. Disability is defined by the American Disability Act as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or a person who is perceived by others as having such impairment. Definition found on website: <http://www.ada.gov/cguide.htm> [↑](#footnote-ref-21)
22. Gender expression is the external manifestations of gender, expressed through one's name, pronouns, clothing, haircut, behavior, voice, or body characteristics. Definition found on website: <http://www.glaad.org/reference/transgender> [↑](#footnote-ref-22)
23. Gender identity refers to one's internal, deeply held sense of one's gender. Gender identity is not visible to others, and may not neatly fit into one “boy” or “girl” category. Definition found on website: <http://www.glaad.org/reference/transgender> [↑](#footnote-ref-23)
24. Sexual orientation refers to an individual's enduring physical, romantic and/or emotional attraction to another person. Definition found on website: <http://www.glaad.org/reference/transgender> [↑](#footnote-ref-24)
25. The City of Portland’s Climate Action Plan Equity Objectives, Appendix 1, found at website: https://www.portlandoregon.gov/bps/article/531984 [↑](#footnote-ref-25)
26. The City of Portland’s Climate Action Plan Equity Objectives, Appendix 1, found at website: https://www.portlandoregon.gov/bps/article/531984 [↑](#footnote-ref-26)
27. The City of Portland’s Climate Action Plan Equity Objectives, Appendix 1, found at website: https://www.portlandoregon.gov/bps/article/531984 [↑](#footnote-ref-27)
28. http://www.fema.gov/media-library-data/20130726-1813-25045-0649/whole\_community\_dec2011\_\_2\_.pdf [↑](#footnote-ref-28)
29. http://www.fema.gov/media-library-data/20130726-1813-25045-0649/whole\_community\_dec2011\_\_2\_.pdf [↑](#footnote-ref-29)