

City of Bend Equity Analysis: Final Report and Structural Recommendations

*Prepared for City of Bend by Kearns & West
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Introduction

The City of Bend is a unique place in Oregon, the largest city in Central Oregon, and one that has seen years of population growth, demographic shifts, and increasingly, is experiencing and responding to the demands that these realities necessitate. As the City considers the future of its equity work, there is an opportunity to build a sense of inclusion and belonging that is the result of doing equity work in a way that centers the work on those that experience the greatest depth of disparity, and from designing and implementing structures, policies, practices and programs that ensure that all employees at the City, and all the residents of Bend have the opportunity to reach their full potential.

Bend is not immune to racism, sexism, ablism, ageism, homophobia and other systems of oppression, or to the realities of inequities that exist regardless of good faith efforts, investments and policy statements. And these challenges that the community and City employees experience are not inevitable—they require intention, systems design, strategic commitments and accountability across the City and its community partners to change.

It is the hope that this report reflects a foundational starting point for the City to reimagine the ways that equity can be advanced. It relies on a belief that internal investments—everything from recruitment and hiring; data analysis and evaluation; training and capacity building; procurement, and policy and systems change—will have external impacts that will benefit all communities in Bend and create enduring outcomes.

I personally want to thank the employees, leadership, elected officials and community members who shared their experiences and wisdom to help inform and shape the findings. There is a commitment and belief in the work and in a future that can be informed by, and improve upon, the past.

-Ben Duncan, Vice President Kearns & West

Background and Context

The City of Bend engaged Kearns & West (K&W) to conduct an independent review of the City's equity and accessibility structures. The goal of this work was to better understand how the City's existing systems, staffing, and strategies align with City Council goals, strategic focus areas, and organizational outcomes

Scope of Work

The scope of this work was centered on assessing the workforce structures within the City government. It does not represent a full analysis of the current state of employee and community experiences. There were two phases of this work that this report reflects:

Phase 1: Analyze current state of accessibility and equity work at the City. This includes reviewing the current organizational structure of employees focused on equity work and evaluating the effectiveness of that structure in delivering on Council goals and strategies with both internal and external audiences.

Phase 2: Develop recommendations for potential future states of accessibility and equity work in the City. This includes proposing revised internal and external organizational structures that the City, at its option, could adopt in the future.

Methodology

The analysis included a series of interviews with City staff and partners. These conversations were designed to provide a candid view of how equity and accessibility work is currently organized and experienced within the City, including what is working well, what challenges exist, and what opportunities exist to advance the work. Out of scope was any evaluation of individual performance or personnel issues. The goal was to identify areas where clearer structures, stronger coordination, or refined approaches could enhance the City's ability to advance equitable outcomes for the internal workforce and the community.

Each interview lasted approximately 30 minutes and followed a consistent set of guiding questions. Participants were asked to describe their role and familiarity with the City's equity goals, reflect on recent priorities and accomplishments, and discuss what supports or structures have been most effective in their work. They were also invited to share their hopes for how the City's approach to equity and accessibility might evolve in the future with a particular emphasis on understanding centralized vs. decentralized functions, and internal and external focus areas.

These questions were designed to inform final recommendations and options for organizational structure, core functions, and the future role of Equity Leadership for the City.

Documents and Core Structures for Equity

Council Goals and Priorities

The City Council has embedded equity into its six focus areas and developed a dashboard outlining progress towards meeting the goals it has set out, with a set of guiding principles that support equitable practice.



These principles "serve as a foundational lens for City staff, helping translate our community's values into an actionable framework that guides decision-making and policy development. They articulate the Bend City Council's core values, ensuring transparency, accountability, and inclusivity in our governance."

Employee Experience

The Employee Experience Plan (EX) represents a combination of previous employee-focused plans focused on improving employee experience. The plan includes five focus areas with associated strategies and actions that serve as a foundation and guiding framework for advancing EX.

Diversity, Equity, Inclusion and Accessibility Advisory Committee

The DEIA Advisory Committee's, comprised of City of Bend employees, has as its purpose is to "embrace and leverage our collective differences, experiences, and cultures to create a more equitable organization where all employees feel like they belong."

The group provides advisory guidance, offers support for implementing DEIA-related actions, and serves as a representative voice for employees on issues related to equity and access. The group has created spaces through Lunch & Learn Series focused on different topics related to equity and inclusion in support of the purpose. The DEIA Advisory Committee is organizationally structured under the Employee Experience Program, utilizes project-based ad hoc groups, and provides members with flexibility to participate in projects of interest.

AIM Equity Tool

The AIM Equity tool is a practical resource for integrating equity into everyday decision-making. AIM stands for Assumptions, Impacts, and Measures. Three areas of questioning that help city staff examine how decisions affect internal and external customers. It is a streamlined tool intended to be easy to use, repeatable, and adaptable across departments.

Employee Experience Outcomes

1. **Trust in Leadership** by increasing cross-departmental engagement and investing in communication
2. **Communication and Collaboration:** Improve communication, information sharing, and cross-departmental connections from the top down, across the organization.
3. **Employee Success:** We invest in our employees by providing tools, resources, benefits, and flexibility that contribute to their success at work and in their personal lives.
4. **Training and Professional Development:** Provide employees with training and professional development opportunities that enhance their employee experience and careers.
5. **Employee Performance and Recognition:** Provide employee goal setting, performance management, and recognition programs that support employees as they progress in their City careers.

The tool is intended to identify potential unintended consequences of decisions, surface and question assumptions, prioritize equity in service delivery, and track and evaluate equitable outcomes using data. Staff are expected to utilize the tool as a shared responsibility, and the tool serves as part of the broader citywide infrastructure that includes participatory governance and Council accountability. The tool is envisioned to be a core structure for the Human Rights and Equity Commission as part of their review and advisory function.

Human Rights and Equity Commission

The Human Rights and Equity Commission (HREC) is an important structure for supporting the interconnection between community and City policy, practice and programmatic decision-making. It's charged with ensuring that *“historically marginalized and underrepresented people and communities in Bend have equal access to City programs and services, representation in City decision-making, and a venue to raise concerns and complaints about discrimination.”*

Accessibility Advisory Committee

The City of Bend Accessibility Advisory Committee (COBAAC) is a group of dedicated volunteers interested in and concerned about ensuring that the City of Bend's programs, services, activities and facilities are accessible to all.

The COBAAC participates in a variety of community engagement activities that raise awareness of the committee's work, encourages community to bring pertinent access issues to COBAAC through public comment, and works in conjunction with the accessibility leadership to ensure the City is accessible to all of Bend's residents and visitors. This includes community events such as “Walk and Roll,” trauma-informed training modules, and lunch and learns, among other activities.

Civil Rights Compliance

The City has several civil rights obligations including ADA Title II, Section 504 of the Rehabilitation Act, Title VI and Title VII of the Civil Rights Act, and Equal Employment and Affirmative Action. Additional obligations may exist that are department-specific, but at its core the City has responsibilities and requirements to ensure compliance. The functions are currently maintained and implemented by Human Resources for internal complaints and investigations for employees, and the City Attorney's Office for external complaints. Title II compliance is overseen by the ADA Coordinator, and EEO/AA reporting is maintained by Human Resources.

Bend City Code 1.20.110, HREC will:

1. *Provide input to the City Council on City goals and policies from a diversity, equity, and inclusion perspective.*
2. *Create a workplan for diversity, equity, and inclusion and advise the City Council on implementation, progress, and updates to the plan*
3. *Work with the Bend community, interested groups, staff, and elected officials to make recommendations that embrace the City's commitment to building a more inclusive community.*
4. *Provide opportunities for people seeking resolution and assistance regarding complaints of discrimination in Bend, including potential violations of the City's Equal Rights*

Key Findings and Considerations

Interview summary and themes

Across all interviews with City staff, participants acknowledge the City's ongoing commitment to equity and accessibility, and a desire to strengthen the systems and supports that make this work possible. The following themes summarize the perspectives that emerged.

Clarity and Direction

Participants noted that the City Council's goals provide a clear and motivating foundation for equity work. However, there remains uncertainty about how these goals are operationalized and specifically, who is responsible for leading, coordinating, and ensuring accountability for different aspects of equity and accessibility. Without clear lines of authority or ownership, efforts can sometimes overlap or move in parallel rather than in concert. While staff often understood who was executing various aspects of work, the organizational structures and authorities have led to inconsistency for standard practice.

Roles and Responsibilities

While there appears to be an organizational culture and commitment to collaboration, interviewees described an uneven understanding of how equity work occurs across departments. Some teams demonstrate strong cross-disciplinary partnerships, but these practices are not consistent across the organization. Many participants reflected on the challenge of realizing a "one City" approach where goals, expectations, and communications are fully aligned.

Consistency of Practice

Stakeholders identified a need for shared standards and expectations that ensure consistency across programs and departments. Questions were raised about which elements, such as onboarding, training, management competencies, procurement goals, and the use of tools like the AIM framework—should be required versus optional. The lack of defined practices can make it difficult to monitor progress or assess effectiveness.

Leadership Structure

A recurring topic in interviews was the role of a Director or leadership position responsible for equity and accessibility. Many participants favored a leadership role with work focused internally that also maintains meaningful connections with the community. There is interest in defining the authority and scope of such a position to ensure alignment, set standards, and reduce duplication. A centralized leadership function was seen as a potential means to support consistency, accountability, and shared expectations across departments. In previous structures, participants noted the Equity Director was not included as part of the Executive Team, which some suggested may have had an impact on the ability of the role to lead citywide work.

Distributed Leadership and Coordination

Participants described distributed leadership as part of the culture and as a core leadership philosophy. This was reflected in several participants emphasizing the value of distributed leadership, noting that some functions, such as ADA compliance or website accessibility, procurement, and policy analysis, have cross-department relevance. Several employees interviewed suggested that these types of responsibilities may be most effective when coordinated through the City Manager's Office/centralized responsibility, with dotted-line relationships or dedicated liaisons ensuring collaboration across teams. The current model of distributed leadership may also contribute to lack of consistency in practice, particularly as there seems to be a culture of "opting in," even for core functions like performance management competencies, equity analysis/AIM tool utilization, and other operational responsibilities conducted across City departments.

Accessibility

Accessibility work was widely recognized as a strength within the City, supported by compliance requirements and clearly defined expectations as well as strong leadership and expertise that is supporting the implementation of programs and practices. Participants saw opportunities to build on this foundation by developing tools and templates that provide practical guidance and support for staff

while maintaining flexibility for departmental and discipline-specific needs. Accessibility is unique in that it reflects a strong legal requirement that mandates specific types of activities, structures, and practice.

Models of Execution

Across discussions, there was interest in some level of centralized coordination that connects City Council guidance and policy direction to operational practice. This was balanced with support for a decentralized structure, with expectations for collaboration, consultation, and deference to expertise. One of the core questions raised was whether the work should be internally or externally focused. Participants described a structure that could focus internally on improving workforce outcomes, data analysis, building training and tools for capacity building around equity practice, and supporting equity analysis to impact external outcomes for the community. Most participants did not imagine the Equity Leadership role focusing externally, particularly because of the infrastructure for community engagement that exists.

Core functions and an “Office” Workplan

Many interviewees referred to a collection of actions that reflect some of the core functions the City is obligated to ensure or invest in advancing. These functions, previously held as responsibilities for staff from the Equity and Accessibility Department, include: the Language Access Plan, DEIA Advisory Team workplan and focus areas, AIM tool rollout, Equity Indicator Report, Employee Resource Group incubation, and support of the existing PRIDE in Public Service ERG. The Employee Experience (EX) strategic plan was also named as an area of key focus for internal workforce improvements, but participants didn't appear to have a firm grasp of where the work was at, how departmental or organizational progress was being tracked, or whether departments had developed specific action plans to implement the EX strategies.

Advisory Bodies

Participants discussed the roles of the Human Rights and Equity Committee (HREC), City of Bend Accessibility Advisory Committee (COBAAC) and the DEIA Advisory Group. Each was viewed as a valuable mechanism for community input and internal collaboration but each currently lacks clarity around authority, consultation processes, and decision-making influence. Strengthening the role and vision for these groups, how they are supported for success, and building more trust through empowering the bodies to be real “value-adds” to the City could empower members. Several participants specifically described a feeling that the HREC served as a “checkbox” for process versus a more meaningful partner to support quality improvement and provide valuable insights that could positively affect decision-making and programmatic and policy approaches. HREC participants reflected the unique opportunity the City has to ensure that it can bring additional value if structured, supported, and empowered to have a more substantive and proactive partnership with the City to identify, examine, and make recommendations for equitable practices, policies and approaches to respond to emerging and existing community concerns.

Community Trust and Relationships

Finally, several participants reflected on the importance of trust and transparency in relationships with community partners. While some noted positive engagement, others described experiences that felt transactional rather than reciprocal. Building and maintaining long-term, relationship-based partnerships was seen as essential for lasting progress and for rebuilding trust that has been fractured.

Equity Structures in the Field

Informing the recommendations and options, the scope included a limited examination of external structures. Previous work reviewing equity-focused strategies and structures across jurisdictions highlights common trends and innovative approaches to advancing equity goals. This section pulls summaries of best practices applicable to public sector organizations and approaches taken by other jurisdictions, emphasizing emerging trends and varied approaches to implementing equity structures and leadership roles.

Research-Backed National Best Practices

- **Embed Equity Analysis into Decision Making.** The Government Alliance on Race and Equity (GARE) recommends leveraging tools like equity frameworks, racial equity impact assessments, and data analysis to integrate equity into decision-making processes. Some jurisdictions apply these tools to ensure policy, budget, and operational decisions to address systemic inequities and produce equitable outcomes.
- **Balance Centralized Oversight with Decentralized Implementation.** Cities often implement a hybrid structure for their equity teams, balancing centralized oversight through core teams focused on integrating best practices with decentralized implementation. Generally, these teams are composed of department-level practitioners and core functions focused on integrating best practices organization-wide. According to the International City/County Management Association (ICMA), this approach provides citywide consistency while allowing departments to address specific departmental and community needs effectively.
- **Leverage Transparent and Measurable Goals.** Transparent performance tracking, such as through public dashboards, demonstrates accountability and builds public trust. GARE emphasizes that measurable equity outcomes are crucial for evaluating progress and ensuring consistent improvement.
- **Embed Community Engagement as a Core Component.** Meaningfully engaging communities is central to equitable governance. GARE underscores the importance of partnerships with community organizations to ensure equity initiatives are informed by lived experiences and aligned with community needs. ICMA cites partnerships, including those with the community, as critical to sustaining change efforts.
- **Develop Capacity Organization-Wide to Sustain Change.** As the Urban Institute notes, successfully advancing equity often involves adopting a change-management model. When systems and processes are narrowly adopted, true transformation cannot occur. ICMA outlines the importance of building capacity to sustain organizational change, including advancing equity. Insufficient or misaligned resources further inhibit implementation. Training helps build capacity by expanding knowledge and understanding. Infrastructure, including capacity for knowledgeable equity teams, equity officers, and data systems, supports implementation.

Equity Leadership Roles

Over the past decade, various leadership positions have reflected the role of a formalized Equity Leadership position in local governments (including Bend). This has resulted in common challenges associated with introducing and integrating new positions and practices into organizations. At formation, the position – and any supporting it – is particularly susceptible to resistance, lack of infrastructure, limited capacity, insufficient authority, and unrealistic expectations. As community needs,

organizational leadership, internal dynamics, and available resources change, these can present ongoing challenges as organizations continue to mature in their equity practices.

Especially when inaugurating the role, or in the City of Bend's circumstance, hiring a new leader into a previously structured leadership role, an equity leader should anticipate navigating instability as the organization seeks to evolve. Success in these roles is predicated on the active support of organizational leaders, sufficient authority, and access to organizational resources. The roles also require an intentional examination of leadership skillsets for navigating complex community and organizational dynamics, being able to have "impact through influence," and management of staff and teams. The skills and qualifications should be thoroughly described in position descriptions and evaluated through hiring processes to ensure the position is set up for success at the organizational and individual level.

Overall, equity leadership positions, and their collaborators, seek to improve decision-making throughout their organizations to support the implementation of policy, practice and approach that leads to more equitable policy and positive public outcomes. Job descriptions vary across jurisdictions, often reflective of existing infrastructure to advance practice across many disciplines, but often include a wide range of efforts, including: analysis and assessment, defining and measuring outcomes, building internal capacity through training, internal technical assistance and thought partnership, advising decision-makers, and ensuring compliance functions are maintained.

Structural Considerations

The scope of the leadership role and the goals and needs of the City should inform the structure that will be most effective in building capacity and shifting outcomes reflecting the analysis of equity offices/capacity across the field. There are a number of functions and structures that exist, providing the City of Bend with choices about what can and will work best.

Key Decision-Points

There is no single "right way" to structure equity work across a governmental organization, but there are key questions and decision points that the City of Bend can consider when aligning core functions and focus areas with structures and a governance model that will work best for the City.

Internal vs. External Scope

An important consideration for structuring equity work will be determining the right level of balance between internal and external scope, and analysis that positions the workforce (staffing, classification and capacity) to best support outcomes. Because "equity functions" cut across internal efforts (e.g. training, policy review, human resource strategies, and internal structures such as web design and digital equity) and external efforts (e.g. community engagement, community advisory bodies, housing and other policy development work), *how* the City organizes its work is fundamentally about what structure will contribute best to outcomes.

In any model the City moves forward, there should be consideration about whether engagement is built into the equity structure and/or ensure clarity about how the equity structure and engagement leadership partners, collaborates, and intersects in the work.

Leadership Role, Authority and Reporting

Advancing equity practices, policy, and programs across numerous lines of business is complex. Having leadership positions with the ability to create change through "influence" vs. "authority" is largely dependent on how the City operates within its internal governance model. For the City of Bend, much of the work has been predicated on a governance philosophy where enterprise-wide equity efforts have

been “opt-in” or ad-hoc partly because of models where there has not been authority to mandate or require, nor hold accountability to specific equity-based practice. For example, the AIM tool is described as an “expectation” for staff but is not required and there isn’t accountability for utilizing the analysis based on a specific standard of integrity and documentation.

Recommendations for Future State

Working with leadership to align the findings and best practices, this section outlines a structural recommendation for the City to advance. The following section provides a description of a centralized office model that the City of Bend can consider as it imagines the future of its equity work. The model relies on two important principles:

Leadership Structure and relationship to decision-making

Based on best practice analysis, existing organizational structure and operational effectiveness, and informed by leadership, staff and community input, the most important functional recommendation positions the Equity Leadership role in a positional hierarchy in the City Manager's Office and serving as part of the Leadership Team for the City. This new structure will require the City to have conversations about authorities, reporting structures, and staffing to ensure that both internal staff and external community have clarity and confidence in the model.

External Advisory Bodies and Structures

Because of the deep connection to equity-related practice, policy and programs, external advisory bodies (HREC and COBAAC) should be aligned with the functions of the Equity Management structure. It will be critical to ensure that there is a strong dotted line with Communications and Engagement, as these specific advisory groups would value from a direct relationship with both the Equity Leadership and Engagement Leadership in the City, particularly as it relates to policies, programs and community-identified priorities. The City can consider including engagement within the equity structure, but at a minimum, the Engagement Manager should have an ongoing working relationship with equity practitioners.

Structural Model

Consultant Recommendation: Establish a **centralized office that would focus on policy and programs** to ensure that equity expertise, leadership, and analysis is embedded at the highest level of policy development, implementation, and equity programs that would have an internal focus but affect externalized outcomes. This model will require a parallel process defining and clarifying the role of the Engagement Leadership role, ensuring that there is a strong link between the roles. Engagement structures and practices should also focus on building out core competencies through training, best practices implementation and technical support across the City to ensure consistency of practice and capacity building for City employees who are tasked with engagement efforts.

Focus and capacity: The Office would include a centralized Core Equity Team including both equity and accessibility programs in the Policy Team operated out of the City Manager’s Office (CMO). The Office would be embedded in decision-making, including representation and influence with Policy Groups, CMO Strategy, Innovation Steering Committee, Employee Experience Steering Committee, and other influential decision-making and programmatic leadership structures. The Office would provide support and be connected to HREC and would convene the Diversity, Equity, Inclusion and Accessibility Advisory Committee to ensure alignment across the City. The focus would be providing internal consultation with a team deployed to partner, support and build capacity across the City as needed.

Finally, the Office would support and provide equity subject matter expertise to departments, programs, City Manager and City Council.

Strengths: Creates flexibility and equity capacity at the City Manager's Office and provides opportunity for a nimble way to execute equity work. Would ensure a stronger alignment and connection to Council Goals and have more opportunity to influence work across issues. Office staff and leadership would serve in an advisory role across the City and be deployed to provide subject matter expertise in support of practitioners working within departments and programs. The Office would have a unique positionality bolstered by proximity and alignment to decision-making and external based outcomes from policies.

Considerations: There would be necessary work to define and stand up this office, including communication externally about purpose and vision and a risk of being perceived as “hiding” the work. A new office that isn’t dedicated solely to equity and accessibility could have challenges with community understanding the role, and when viewed in isolation of the Engagement Leadership role, could be seen only as internally focused, or having a scope that is so expansive it is difficult to prioritize and have clarity for direction. Accessibility in a policy office could create confusion about the focus as it requires both regulatory compliance work (including investigations) and policy, program and practice-based efforts. Would require change management and “buy-in” with Departmental Leadership and program staff.

Conclusion

The City will need to translate the recommendations into an organizational model reflecting reporting structures, classifications, position titles and descriptions. The City will also need to very clearly define and articulate the distinction of roles between the Equity Leadership and Engagement Leadership positions, avoiding the replication of systems concerns identified in the key themes from staff, leadership and community interviews.

The City of Bend has the potential to ensure equitable outcomes are achieved by investing in structures that will support best practices, establish consistent and measurable standards, and utilize tools and frameworks that create accountability for outcomes and impacts. The combination of structural and systems change with leadership that is supported and has the requisite skills to navigate this complex discipline through the challenges Bend currently faces, and will face in the future, will position the City to rise up to its values and meet the vision of a Bend where every community member and employee can thrive.