



# Transparent Governance: **FY 2014-15 to FY 2023-24**

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August 2025  
A Report by the Office of the Auditor

**Brian Evans**  
*Metro Auditor*

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## MEMORANDUM

August 13, 2025

To: Lynn Peterson, Council President  
Ashton Simpson, Councilor, District 1  
Christine Lewis, Councilor, District 2  
Gerritt Rosenthal, Councilor, District 3  
Juan Carlos Gonzalez, Councilor, District 4  
Mary Nolan, Councilor, District 5  
Duncan Hwang, Councilor, District 6

From: Brian Evans, Metro Auditor *BE*

**Re: Audit of Transparent Governance**

The following report is a review of trends related to government transparency over the last ten years. This is the first in what I expect to be a regular governance audit completed every two years. The indicators are based on the State of Oregon's transparency website and other government transparency reports.

The report shows data is available to monitor trends for public meetings, public records requests, lobbyists, and contractors. Unfortunately, data for ten years was not available for each of these data points. By the time the next report is completed in 2027, it should be possible to include longer time periods. The data related to procurement is less reliable, which makes it more difficult to know if rules to ensure fair and open competition for contracts are effective.

I have discussed the report with the Chief Operating Officer, Deputy Chief Operating Officers, Chief Financial Officer, and COO Office Director. I would like to thank them and all the other employees for their assistance and cooperation during the audit.

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## Summary

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This audit includes data to evaluate long-term trends in measures of government transparency. The four areas analyzed are aligned with the State of Oregon's Transparency website and other government transparency reports. Each area can help the public understand how Metro works.

- **Public meetings** allow the public to observe policy deliberations and provide comments in some cases.
- **Public records** provide information about how programs and services are administered.
- **Lobbyist registrations** show who is seeking to influence policy and administrative decisions.
- **Contract and procurement data** show who does business with Metro and how contracts were awarded.

This report is the first in what is expected to be a regular transparency audit completed by the Metro Auditor's Office every other year. Monitoring long-term trends for each area is one way to increase transparency about how well these functions work and identify opportunities for improvement.

The audit concluded that Metro's policies related to public records, lobbyist registrations, and contracting appear well designed to ensure legal compliance. Policies related to public meetings were less formal which could increase legal risks.

The audit recommended improvements in the following areas:

- Consistency of public meeting notices for Metro's advisory committees.
- Proactive communication with lobbyists about the need to file annual financial statements.
- Improved quality control processes to ensure the reliability of contract and procurement data.

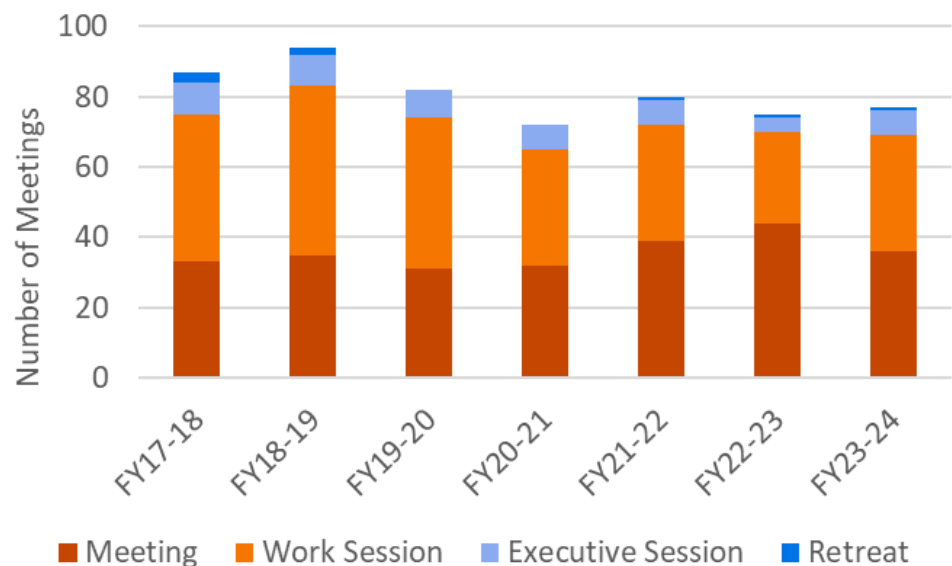
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cases

Public meetings help inform the public about policy deliberations and provide an opportunity to give input. State law requires that governing body meetings and deliberations are accessible, and that reasonable notice of the time, place, and subjects of these meetings is given.

Metro Council is the primary governing body, but there are other advisory groups that may be subject to Oregon Public Meetings law. This includes the Metropolitan Exposition and Recreation Commission (MERC), as well as other permanent or ad hoc groups. Although not all advisory groups are required to follow public meetings law, Metro typically posts meeting information online for the public.

The number of Council public meetings declined by 6% from FY 2017-18 to FY 2023-24. The decline was driven by nine fewer work sessions. Regular meetings and special meetings increased by four during that time. Metro has data on Council meetings going back over ten years, but the current software has been in use since September 2016, so the analysis was done for the last seven fiscal years.

**Exhibit 1 Metro Council meetings decreased by 6% over the last seven years.**



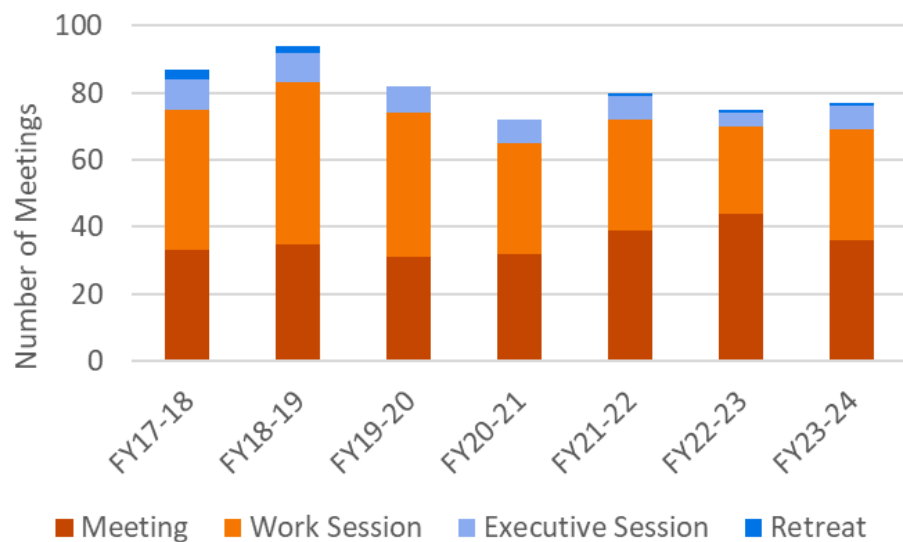
*Source: Auditor's Office analysis of meetings posted online in Granicus and document management system (Content Manager).*

Over the last seven fiscal years, there was an average of 76 Council meetings per year. On average, there were about the same number of regular and work sessions per year. Special meetings like executive sessions and retreats averaged three per year during that time. Council holds meetings on Tuesdays and Thursdays and has historically been in recess in August. As such, about 96 meetings are initially expected each year, but some get canceled.

In general, fewer public meetings reduce the public’s opportunities to observe and engage in Council deliberations. The decline in public meetings beginning in FY 2019-20 was likely due to COVID related restrictions that began in March 2020. Cancelled meetings increased that fiscal year as Metro adjusted to remote work and set up the process for holding virtual meetings.

MERC, along with Council, are the governing bodies for the Oregon Convention Center, Exposition Center, and Portland’s Centers for the Arts. The number of MERC public meetings declined by 50% in the last ten fiscal years. The decline was the results of fewer meetings of all types during that time. Some of the decrease was caused by fewer budget related meetings beginning in 2019. Another potential cause was more meetings than usual in FY 2014-15 to update the First Opportunity Target Area program.

**Exhibit 2 Metropolitan Exposition and Recreation Commission (MERC) meetings decreased by 50% in the last ten years.**



*Source: Auditor’s Office analysis of documents downloaded from Metro’s website or provided by the MERC meeting coordinator.*

**Centralizing meeting information about advisory groups could improve access for the public**

The public meetings of many of Metro’s other advisory groups are managed by several parts of the organization using different systems. This structure made it more difficult for the public to find meetings. It could also increase the risk of noncompliance with public meetings law and records retention requirements.

Metro Code lists 17 advisory groups to Council. Some of these groups were inactive during the audit. Metro’s 2024 Public Engagement Guide listed eight other groups that were not included in Code. In addition, ad hoc advisory groups were sometimes created for a limited duration. For example, the Council President convened a Supportive Housing Services program workgroup that met from February through June 2025.

Since September 2016, Granicus has been the software used to provide public notices, meeting materials, and audio or video records of Council meetings and two other advisory groups. MERC began using the system for their meetings in January 2025. The other advisory groups use separate systems and processes to manage their meetings.

During the audit, we learned that there would be no additional cost to use Granicus for other advisory groups. While some employees we spoke with felt the system might be too complicated for some groups, it has the benefit of creating consistent processes to manage public meeting requirements and providing a one-stop location for the public to find all meetings in one location.

In addition to facilitating compliance with public meetings law, using Granicus could increase the efficiency and effectiveness of records retention requirements. Oregon law requires governments to maintain records for specific time periods. Our review indicated variation in where and how meeting materials were stored. Some were posted online, and some were only available by making a request.

Using the same system to manage all public meetings could help prepare Metro to defend itself from claims of noncompliance with public meetings law. As part of new requirements passed by the Oregon Legislature in 2023, governments are now required to follow a process to address grievances related to public meetings. If the grievance cannot be resolved, the Oregon Government Ethics Commission is authorized to address the claim. Using Granicus to manage all public meetings could increase consistency in how notice is provided and make all meeting materials available in one location online. These improvements would likely decrease the chances of disputes with the public or ethics commission.

We also found inconsistent use of Metro's document management system for storing meeting materials. Some was stored in the system and some was not. The document management system is the primary tool Metro uses to ensure records retention requirements are met. We did not evaluate whether records were retained as required, but inconsistent documentation in the system could indicate records may not be retained as required.

**Access to records  
helps the public  
learn how  
programs and  
services are  
administered**

Public records include any writing that contains information relating to the conduct of the public's business. State law requires governments to provide a copy of a requested record and an opportunity to review or make copies of it. Metro has five business days to acknowledge a request. It has ten days to complete the response after the acknowledgement or must provide a written statement that the request is still being processed with an estimated timeline.

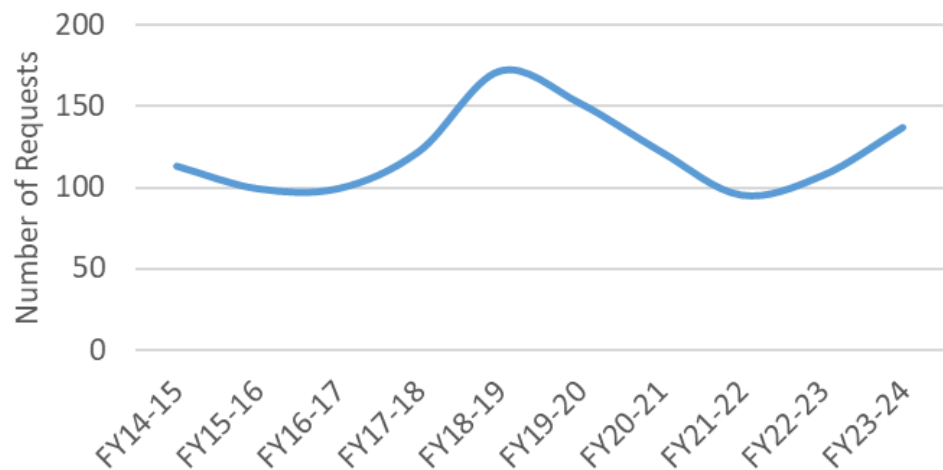
Governments can charge a fee for providing the requested information. Unless otherwise agreed-upon, the fee is not supposed to exceed \$25. If a fee has been established, Metro has the right to suspend its response until paid or waived within 60 days.

At Metro, the Information Technology and Records Management department manages the policy, process, and software for public records requests. Employees coordinate with other departments and venues to identify responsive records and provide them to the requester.

GovQA is the software used to manage public requests. It provides an online portal for the public to make requests and manages internal and external communications for fulfilling them. It also had reporting functionality that can be used to summarize trends.

The number of public records requests made to Metro increased by 21% over the last ten fiscal years. After several years of declines, the number of requests increased in the most recent two fiscal years.

**Exhibit 3    Public records requests increased by 21% in the last ten years.**

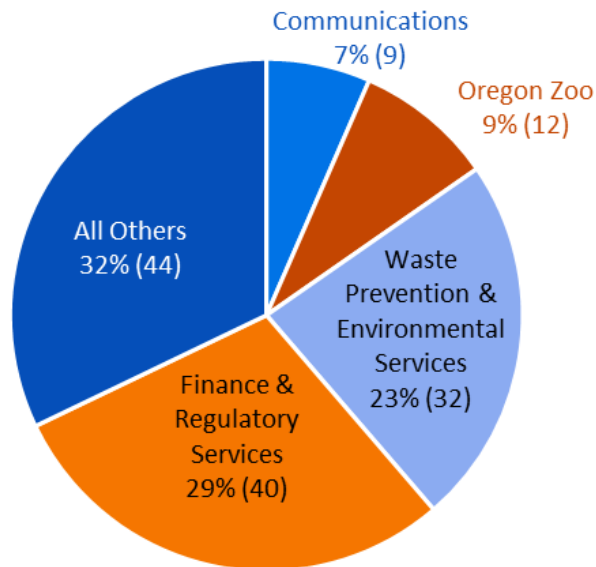


*Source: Auditor's Office analysis of data in Metro's public request database (GovQA).*

Requests increased each of the last two years due to an increase in requests related to solid waste and visitor venues. It was not possible to determine the specific causes of variation in the number of requests per year prior to FY 2020-21 without reviewing each request individually.



**Exhibit 4    More than half the public records requests in FY 2023-24 were for records in two departments**



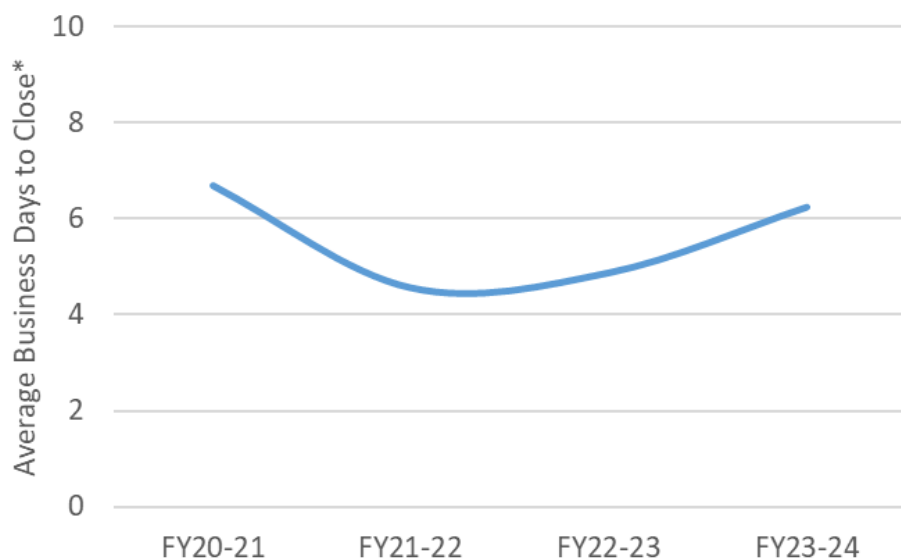
*Source: Auditor's Office analysis of data in Metro's public request database (GovQA).*

Of the 137 public records requests received in FY 2023-24, Finance and Regulatory Services (FRS) and Waste Prevention and Environmental Services (WPES) accounted for more than 50% of the total. FRS manages the procurement function which has been the single biggest category of records requested in recent years. WPES manages garbage and recycling operations, which has been consistently the second largest category of records requested during the same period.

Variation in the number of requests can impact employee work loads and associated costs. Making more records available through Metro's online records search tool could reduce costs. However not all records may be appropriate for automatic disclosure, so additional analysis and criteria may be needed achieve more efficiency.

It took an average of 5.7 business days to close requests from FY 2020-21 through FY 2023-24. This excludes time spent waiting on a response from the requester or appeals to the district attorney. It took an average of 4.6 business days on the low side to 6.7 business days on the high side. Metro has public records data going back 10-years, but the data for response times are not comparable. As such, response time analysis could only be done for the last four fiscal years.

**Exhibit 5 From FY 2020-21 to FY 2023-24 it took an average of 5.7 business days to complete public records requests.**



\*Excludes time waiting for clarification or payment from the requester, and time waiting for an appeal to the district attorney.

Source: Auditor's Office analysis of data in Metro's public request database (GovQA).

Metro's average response times indicated general compliance with state law, but there was considerable variation among requests. Many took less than a day, while some took more than six weeks. During the last four fiscal years, excluding time waiting for the requester to respond or provide payment, or appeals to the district attorney:

- About 15% of requests took 10 business days or more to close.
- About 7% of requests took 15 business days or more to close.
- About 2% of requests took 30 business days or more to close.

**Lobbyist  
registrations show  
who seeks to  
influence policy  
and administrative  
decisions**

Metro Code requires lobbyists to register and file a financial report with Council annually if they spend more than five hours per calendar quarter lobbying. Lobbying is defined as:

*"...influencing, or attempting to influence, legislative action through oral or written communication with Metro officials, solicitation of others to influence or attempt to influence legislative action or attempting to obtain the good will of Metro Councilors."*

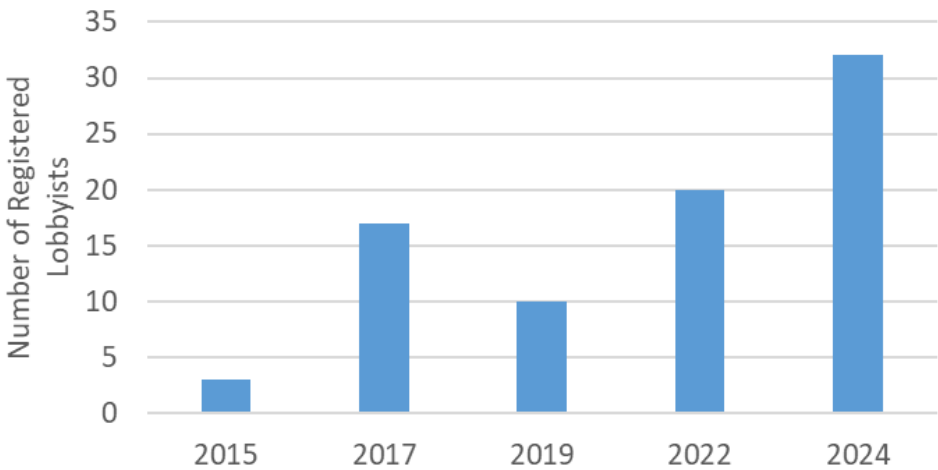
It is important to note that Metro officials are included. Metro officials are department directors and managers not just elected officials. All lobbyists are required to file a financial statement by April 15th each year. The statement must have:

- The total dollar amount for food, refreshments, and entertainment for lobbying purpose.
- The name of the Metro official who benefitted from the expenditures over \$50, date of expenditure, name of payee, purpose, and amount.

The Government Affairs and Policy division in the Chief Operating Officer’s Office administers lobbyist registrations. An employee in that division uses a process to update the lobbyist registration list online and communicates with potential lobbyists to make sure they are aware of the requirements. The registration list is published on Metro’s website along with information about some of the lobbyist requirements in Code.

From calendar year 2015 to 2024 the number of registered lobbyists at Metro grew from 3 to 32 (967%). The increase may be the result of greater awareness of registration requirements, greater interest in the topics being addressed by Metro, or both. Nearly all registered lobbyist in 2024 were for land use, transportation, housing, and solid waste (27). The rest (5) focused on economic development or parks and natural areas.

**Exhibit 6    The number of registered lobbyists increased significantly in the last ten years**



Source: Auditor’s Office analysis of lobbyist registrations posted on Metro’s website in calendar years 2015, 2017, 2019, 2022 and 2024. Data was not collected in 2016, 2018, 2020, 2021, or 2023.

**Most registered lobbyists in 2024 did not provide annual financial reports as required**

Over the last 8-years, the Auditor’s Office notified management and Council about weaknesses with lobbyist registrations including a letter to management and a follow-up audit. They identified lack of clear roles and responsibilities among employees, and inconsistent guidance about requirements as two root causes. Since then, GAPD and the COO’s Office created procedures to manage the registration process.

Despite these efforts, communication about financial reporting requirements appeared to be a weakness. Metro received two financial disclosure reports from lobbyists in 2024 (for lobbying activity done in 2023). This means 30 of the 32 (90%) registered lobbyists did not provide a financial report by the deadline.

Metro’s communications with lobbyists did not include information about financial reporting requirements. Although compliance is the responsibility

of individual lobbyists, governments sometimes proactively set up processes to facilitate compliance. For example, public officials who are required to submit statements of economic interest annually with the State of Oregon are notified by email prior to the deadline. A website is available to facilitate the filings and make the records available to the public by default without having to submit a public records request. Implementing a similar system at Metro or, at a minimum, including financial reporting requirements as part of the registration process could improve compliance.

## Contract spending shows who does business with Metro

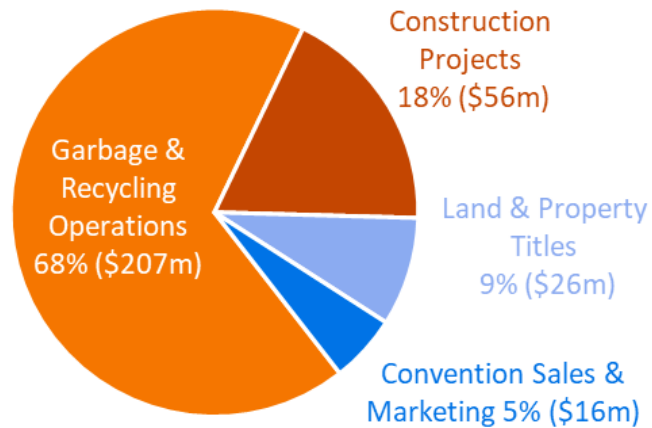
Contracting with external entities is one way Metro provides public programs and services. Procurement is the process governments use to award contracts. To meet legal requirements, Council adopted Local Contract Review Board Administrative Rules for procurement. In addition to meeting legal requirements, the administrative rules seek to:

- Instill public confidence through ethical and fair dealing, honesty and good faith on the part of government officials and those who do business with the government.
- Promote efficient use of federal, state and local government resources, maximizing the economic investment in public contracting within this state.
- Allow impartial and open competition, protecting both the integrity of the public contracting process and the competitive nature of public procurement.

Procurement processes are managed by Procurement Services in FRS. They work with the departments and venues to manage contract solicitation and award processes. The Chief Financial Officer is Metro's Procurement Officer. Council delegated most of their authority for contracts to the Chief Operating Officer or Procurement Officer to administer and interpret administrative rules. The Procurement Officer has delegated some-authority to the Procurement Services Manager.

Metro's top ten contractors received a total of about \$300 million from FY 2019-20 through FY 2023-24. Contractors related to garbage and recycling operations accounted for about 68% (\$207 million) of the total. Contractors for construction projects were the second highest (\$55 million). The third highest (\$26 million) was for work related to land and property purchases. Convention sales and marketing services were the fourth highest (\$16 million).

**Exhibit 7 Garbage and recycling service received the largest share of contract spending from FY 2019-20 through FY 2023-24.**



*Source: Auditor's Office analysis of PeopleSoft Finance Materials and Services data FY 2019-20 through FY 2023-24 and contract documents stored in Content Manager.*

Among garbage and recycling contractors, transportation to the landfill had the largest spending at about \$59 million. The landfill contractor was second at about \$48 million. Payments to the operators of Metro's two solid waste transfer stations (Central and South) were the next two highest.

**Exhibit 8 There was wide variation in the amounts received by Metro's top ten contractors from FY 2019-20 through FY 2023-24.**

Vendor	Work includes	Five-year Total
Walsh Trucking Co Ltd.	Transportation to the landfill	\$58.8m
Waste Management of Oregon Inc.	Landfill	\$47.6m
Recology Oregon Recovery - South Inc.	Transfer station operations	\$47m
Recology Oregon Recovery - Central Inc.	Transfer station operations	\$45.7m
Lease Crutcher Lewis LLC	Construction projects at Oregon Zoo	\$36.7m
Chicago Title Company of Oregon	Property transaction services	\$26.3m
Travel Portland	Convention sales and marketing	\$16.4m
M.A. Mortenson Company	Construction projects at Portland's Centers for the Arts	\$10.9m
Swinerton Builders	Construction projects at Blue Lake Park and Metro Regional Center	\$8.3m
Devin Oil Company, Inc	Diesel fuel for solid waste transportation	\$7.9m

*Source: Auditor's Office analysis of PeopleSoft Finance Materials and Services data FY 2019-20 through FY 2023-24, and contract documents stored in Content Manager. Amounts were not adjusted for inflation.*

## Data to evaluate the effectiveness of procurement rules is available, but it has limitations

Spending provides transparency about Metro's largest contractors. However, it does not provide information about how well administrative rules are working to ensure competition, fairness, and good value for money. Administrative Rules include processes to get approval from the appropriate authority if the normal process cannot, or was not, followed for various reasons. We found data was available to monitor these data points, but there were weaknesses.

In the past, Metro's practice was to document exceptions to administrative rules in memos. As such, the number of memos could be used as a tool to monitor performance of the rules and evaluate trends among the exception types. Recently, some exceptions were documented in contract intake forms rather than memos, so the number of memos likely undercounts the total number of exceptions. The existence of a memo does not mean something went wrong, but they could help management know if more attention is needed to ensure procurement processes are meeting the intent of procurement rules.

There were generally three types of memos used in Metro's procurement processes.

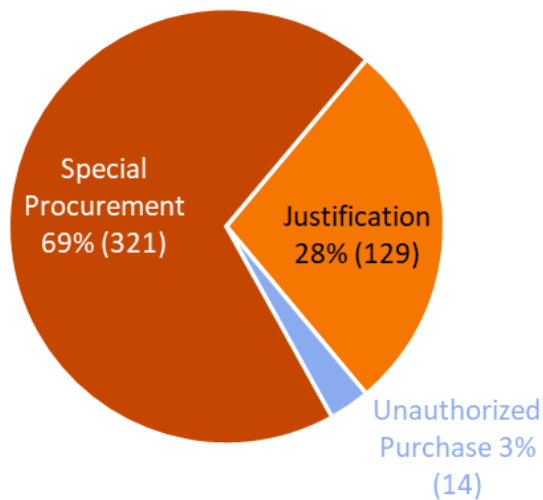
- Special procurement memos documented approval to use a different process to award a contract than what is specified in the administrative rules.
- Justification memos documented approval to exceed the original value or end date of existing contracts within certain thresholds.
- Unauthorized purchase memos were used to acknowledge non-compliance with administrative rules and create an action plan to reduce the chance of it happening again.

There were two potential data sources for memos. Memos stored in the document management system was one source. The other was procurement data in the accounting system. We concluded that the document management system had more reliable data. More information about our conclusions related to data in the accounting system are summarized in the last section of this report.

Based on Metro's document management system, we estimated the follow totals for the period FY 2017-18 through FY 2023-24. The totals likely undercount the number of exceptions but provide an estimate of the potential volume:

- 321 special procurement memos.
- 129 justification memos.
- 14 unauthorized purchase memos.

**Exhibit 9    Special procurement memos were the most common exception type from FY 2017-18 through FY 2023-24.**



*Source: Auditor's Office analysis of documents stored in Metro document management system (Content Manager) for FY 2017-18 through FY 2023-24.*

Most of the 321 special procurement memos in the documentation management system were in three categories. About 26% were for partnerships with nonprofits. Software and information technology hardware accounted for about 24%. Contracts related to perishables like medication, laboratory materials, and food made up 13% of the total. All other categories combined accounted for the remaining 37%.

The administrative rules limit the dollar amount of amendments to existing contracts. Justification memos are used to document approval to exceed the thresholds. When contracts are signed without following procurement rules, or when existing contracts exceed certain thresholds without approval by the appropriate authority, they are defined as unauthorized purchases. Most of the unauthorized purchase memos in document management system occurred in FY 2018-19 (10 of 14). Many of these were for small contracts (\$5,000 or less) where work began before the contract was signed.

We did not find any unauthorized purchase memos in the document management system for FY 2023-24, but we identified two examples that appeared to meet the criteria for unauthorized purchases. Other memo types were used as substitutes. In one example, an existing contract's scope of work was significantly changed, and additional funding was awarded. A justification memo was used to document the changes after the contract amendments were signed. In another example, a contract for software was awarded without following the administrative rules. A special procurement memo was created after the contract was signed to document that purchase.

These examples indicate potential inconsistencies in how administrative rules are enforced. One of the benefits of using unauthorized purchase memos is that they require acknowledgement of noncompliance and an action plan to

Inconsistent  
procurement data is  
a barrier to  
evaluating long-term  
trends

prevent it from happening again. Documenting the lessons learned from these situations can improve understanding of procurement processes among employees. It can also help management identify places in the process where the rules and associated procedures could be improved to set employees up for success.

We attempted to use data in Metro's accounting system to verify the accuracy of the data in the document management system. We found the procurement data in the accounting system was unreliable for evaluating long-term trends. There were three primary causes.

One of the causes was inconsistent use of coding. The procurement data in the accounting system was used to track a wide variety of agreement types including contracts, grants, and intergovernmental agreements. As such the *type* field was critical to be able to differentiate between agreements that are subject to procurement administrative rules and those that were not.

We identified 24 *type* codes. Some were very specific, like contracts for land purchases, art, or specific types of construction. While others were very general such as *agreement*, *other*, and *non-standard*. These codes had been created or discontinued over time so it was difficult to determine which types should be included in totals from year to year.

The second cause was inaccurate queries and reports. The query and associated annual report of contracts awarded did not include all contracts awarded that year. Procurement Services reviewed the inconsistencies we discovered and determined that report was filtering out contracts that should have been included. This made it difficult to have assurance that annual totals were accurate.

The third cause was small discrepancies in contract start dates. For example, sometimes the start date listed in the accounting system was a few days different from the start date in the contract itself. This made it difficult to have assurance that annual totals were accurate for each fiscal year even if the queries included all relevant contract types.

There were at least two annual reports where these data reliability issues could have an effect. We were told the only public report related to contracting was the *Equity in Contract Report*. That report was used to track progress on contracting with minority-owned, women-owned, veteran-owned, and emerging small businesses. We were told it took significant time to ensure the data in those reports was as accurate as possible.

Metro's financial auditors also relied on annual reports about the number of contracts awarded and contract amendments to complete their work. We found errors in the FY 2022-23 and FY 2023-24 reports that prevented the financial auditors from seeing a complete list of contracts awarded.

Procurement Services acknowledged weakness in procurement data and made efforts to improve queries when we shared our concerns about



reliability. Metro began a process to select a new accounting system in April 2025. Incorporating lessons learned from the current weakness will be important to ensure the new system can provide reliable procurement data efficiently in the future.

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## Recommendations

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1. Metro should post notices of all public meetings in the same location online to ensure alignment with legal requirements and improve access for the public.
2. The Government Affairs and Policy Division should proactively request annual financial statements from each registered lobbyist prior to the annual deadline.
3. Procurement Service should increase the reliability and consistency of procurement and contract data in the accounting system by:
  - a. Implementing a quality control process to ensure accuracy between contract documents and electronic data.
  - b. Creating a process to formally approve changes to procurement related codes.
  - c. Reviewing procurement and contracting queries and reports to ensure they are accurate.

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## Scope and methodology

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The purpose of this audit was to determine the transparency of Metro governance based on trends in public records, public meetings, lobbyist registrations, and contracting. There were four objectives:

1. Determine the number of public records received each year and whether Metro's response was aligned with legal requirements.
2. Determine the number and type of public meetings held each year and if there are ways to inform the public about them more efficiently and effectively.
3. Determine the number and type of registered lobbyists and assess whether Metro Code requirements are being followed.
4. Determine the number of contracts awarded, the amount spent on the ten largest contractors annually and estimate the number of procurements that did not follow the normal process.

The scope was FY 2014-15 to FY 2023-24 where data was available for a full 10-year trend. Some trends in the report were shorter due to data limitations that would make comparisons over a 10-year period inappropriate.

To accomplish our first objective, we obtained and analyzed public record request data in the system of record (GovQA) for the period FY 2014-15 through FY 2023-24. For the response time analysis, data was only available for the period from FY 2020-21 through FY 2023-24. We interviewed employees involved in the process, reviewed legal and policy documents, and completed data reliability tests to gain reasonable assurance of data accuracy.

To accomplish the second objective, we obtained data about Metro Council's public meetings from the system of record (Granicus) for the period FY 2017-18 to FY2023-24. For the Metropolitan Recreation and Exposition Commission's public meetings we obtain data from Metro's website and meeting administrator for the period from FY 2014-15 to FY 2023-24. We interviewed employees who administer public meetings, reviewed legal and policy documents, and completed data reliability tests to gain reasonable assurance of data accuracy.

To accomplish the third objective, we obtained and analyzed the lists of registered lobbyists from Metro's website in 2015, 2017, 2019, 2022 and 2024. We interviewed employees who administer the lobbyist program, reviewed legal and policy documents, and completed data reliability tests to gain reasonable assurance of data accuracy.

To accomplish the fourth objective, we obtained and analyzed contract data from the document management system (Content Manager) and accounting system (PeopleSoft). For contract spending, the data set covered FY 2019-20 through FY 2023-24. For contract documentation the period spanned from FY 2017-18 through FY 2023-24. We interviewed employees who

manage procurement and contract data, reviewed legal and policy documents, and completed data reliability tests to gain reasonable assurance of data accuracy.

The audit was included in the FY 2024-25 audit schedule. 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.

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# Management response

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## Memo

Date: August 8, 2025  
To: Brian Evans, Metro Auditor  
From: Marissa Madrigal, Chief Operating Officer  
Subject: Management Response – Transparent Governance Audit August 2025

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Management would like to thank the Metro Auditor for undertaking the “Transparent Governance” audit and for its thoughtful and constructive recommendations. This audit addresses core principles that are foundational to public trust and effective government: access, accountability, and responsible stewardship of public resources. Transparency is an essential element in building and maintaining trust in government, and a value that we seek to apply at all levels of the organization. This audit provides an opportunity for us to reflect on our current practices, assess where we can strengthen our systems, and ensure that we are meeting both the letter and the spirit of applicable laws and policies. In several cases, the issues identified by the Metro Auditor intersect with active initiatives underway at Metro that aim to enhance accessibility and improve data and reporting accuracy. For example, we are in the process of a comprehensive RFP to select a new Enterprise Resource Planning (ERP) system. This selection process represents a major organizational investment and a transformative opportunity to reduce reliance on manual processes, improve data accuracy, support more automated workflows, and enable more sophisticated reporting and analysis capabilities. These improvements will directly contribute to better transparency and more timely, accurate information for both internal stakeholders and the public.

Additionally, we are assessing how new federal regulatory requirements may impact how we prioritize and sequence the implementation of certain recommendations. Specifically, the U.S. Department of Justice recently finalized new rules under the Americans with Disabilities Act regarding the *Accessibility of Web Content and Mobile Apps Provided by State and Local Governments*. These requirements will shape how we present digital content and structure our online engagement tools and platforms. As we work to comply with these new standards, we will need to ensure that any changes we make to improve transparency and public communication are also aligned with accessibility best practices and legal obligations.

In closing, we are grateful for the audit's contribution to our ongoing dialogue about transparency, governance, and public accountability. We remain committed to meaningful progress in these areas and to working collaboratively with the Auditor, Council, and the community to implement improvements that reflect our shared values. We look forward to building on this foundation as we modernize our systems, strengthen public trust, and continue to serve our community with integrity and openness.

Overall, management agrees with the recommendations, and you will find our responses to each recommendation as follows:

**Recommendation 1:** *Metro should post notices of all public meetings in the same location online to ensure alignment with legal requirements and improve access for the public.*

Management agrees with this recommendation and recognizes the importance of ensuring public meeting notices are consistently posted in the same location online. Currently, Metro's website includes a centralized events page to fulfill this purpose. However, there are opportunities to further clarify and strengthen roles, responsibilities and processes to ensure consistency, ease of access and compliance. We will review our current process and identify any areas that need refinement or enhancement. This review will be completed by early calendar year 2026.

**Recommendation 2:** *The Government Affairs and Policy Division should proactively request annual financial statements from each registered lobbyist prior to the annual deadline.*

Management agrees with this recommendation. The Government Affairs and Policy Development (GAPD) team will introduce a proactive process to request annual lobbying expense statements from registered lobbyists ahead of the annual deadline. In support of this effort, we will also update the guidance provided to registered lobbyists to emphasize their obligation to submit these expense statements in a timely manner. Together, we anticipate these steps will improve overall compliance and reduce the need for follow-up. We anticipate implementing both updates before the next financial statement deadline of April 15, 2026.

**Recommendation 3:** *Procurement Service should increase the reliability and consistency of procurement and contract data in the accounting system by:*

- a. Implementing a quality control process to ensure accuracy between contract documents and electronic data.

Management agrees with this recommendation and plans on implementing it as part of Metro's replacement of our core financial and human resources system, also called an enterprise resource planning (ERP) system. A significant source of the challenges in this area are the result of manual processes that create increased opportunities for error. The implementation of a new ERP presents a major opportunity to modernize our systems and business processes. One of the key goals of the new ERP system is to expand automation and improve alignment between business processes and compliance requirements. Metro is selecting a new software vendor in Fall 2025 and plans to begin implementation in early calendar year 2026.

b. Creating a process to formally approve changes to procurement related codes.

Management agrees with this recommendation and will implement it as part of a new ERP governance process in conjunction with the rollout of the new ERP system. The new governance process will be designed to introduce standardized controls, workflows and documentation for improvement or other changes to system codes and definitions, including those in procurement. This includes establishing clear guidance for when changes are appropriate, who approves them, and how those decisions are tracked. This work is part of a broader effort to strengthen system governance and improve consistency and accountability across processes.

c. Reviewing procurement and contracting queries and reports to ensure they are accurate.

Management agrees with this recommendation. As part of the ERP project, Metro is developing improved reporting functionality and a data governance structure that will support more accurate, consistent and transparent procurement reporting. Requirements for the new ERP system include the capability to create and generate standardized reports, clearer data definitions, and improved usability, making it easier to validate information and ensure ongoing accuracy across procurement and contracting queries. As mentioned above, the ERP system implementation will begin in early 2026.

Thank you for the opportunity to respond, please let us know if we can answer any questions or provide clarification.



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