



## CITY OF SAINT PAUL

*Melvin Carter, Mayor*

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May 1, 2018

The Honorable Melvin W. Carter III  
Mayor, City of Saint Paul  
390 City Hall  
15 West Kellogg Boulevard  
Saint Paul, Minnesota 55102

Dear Mr. Mayor:

On behalf of the Saint Paul Department of Human Rights and Equal Economic Opportunity Office (HREEO), I am pleased to present you with the ***Findings Report***: a report from the Human Rights and Equal Economic Opportunity Commission's Audit of the HREEO Human Rights Division. In June 2017, the HREEO Commission formed an audit committee at the request of HREEO Director Jessica Kingston because of concerns expressed by the NAACP Saint Paul Branch and other community stakeholders regarding the responsiveness to human rights complaints filed with the office. The purpose of the audit was to identify assets and gaps in the case management and review process to produce recommendations to ensure greater effectiveness, efficiency, transparency, and accountability in service to the community.

The Audit Committee undertook an extensive six-month review of the Human Rights Division's process and procedures as it relates to their investigative function outlined by the ordinance. The Audit Committee was comprised of five (5) HREEO Commissioners and the HREEO Commission Staff Liaison, with the assistance of the Saint Paul Innovation Team. The review of the division was driven by a multi-pronged approach including; (1) staff interviews; (2) best practices research; (3) process mapping development and analysis; (4) investigative process review; (5) data analysis; and (6) external stakeholder engagement.

For Saint Paul Residents benefit fully from the protections of the Human Rights Ordinance, the Human Rights Division must engage in vigorous and timely enforcement of the Ordinance and be engaged in proactive activities in the community to prevent such occurrences. Since assuming the role of Deputy Director in April 2017, I have started to implement many of

the practices that would eventually be recommended in the audit. The specific recommendations developed by the Audit Committee will be implemented as follows, using 30, 60, and 90-day benchmarks:

#### 30-Days

1. Develop training expectations: Identify minimum numbers of hours and content areas for each investigator (Century College, MN CLE, HUD, EEOC, etc.).
2. Finalize spreadsheet format and receive training on pivot tables to produce reports and monitor case processing.
3. Regular monitoring of caseloads and develop markers on investigation process timeliness internally (once a month meeting) and externally (communication with complainants).
4. Internal memorandum to file to outline investigative plan, witness tracking, evidentiary review and other protected information that cannot be shared in the final determination. Should questions arise regarding the investigation, this document can be referenced to demonstrate what was done and considered to make that particular case's cause or no-cause determination.
5. Continue regular staff meetings and one-to-ones with Deputy Director.

#### 60-Days

1. Create an orientation for new employees using the Human Rights Division Standard Operating Procedures Document and the City's New Hire materials.
2. Draft customer service policies and protocol that align with the mission of the HREEO department.
3. Community Outreach Strategic Plan to improve understanding of the distinct role of the Human Rights Division and HREEO. Identify the role of each individual staff member in this endeavor.
4. Develop plan to document successes of the division and overall marketing campaign.
5. More strategic planning to focus on core expectations and/or vision for the Division..
6. Meet with CAO and City Lobbyist to develop subpoena power strategy.

90-Days

1. Decide on which case management system to pursue and its' budgetary impacts.
2. Develop outreach plan targeting specific stakeholder groups and training/educational content for groups that we are aligned.
3. Re-assert our leadership concerning human rights issues trough building internal and external partnerships

In closing, I would like to make clear that the audit of the Human Rights Division confirmed investigation findings and decisions were generally well reasoned with sufficient supporting analysis and of high quality. Additionally, the division has knowledgeable, experienced, and highly motivated staff members in place to implement the recommendations. Complacency, with respect to timeliness in case closure, may have set in among some investigators, however, there has been a new commitment to excellence and a renewed focus on being the “guardian” of the rights delineated in the City of Saint Paul Human Rights Ordinance. We look forward to reporting back on our progress in accomplishing these goals and being the best human rights division that we can be.

Sincerely,

Jeffry D. Martin  
Deputy Director