

Findings Report

*A report from the Human Rights and Equal Economic Opportunity (HREEO)
Commission's Audit of the HREEO Human Rights Division*

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Letter from the Audit Committee

Dear Mayor Carter, St. Paul City Council, Residents, Business Owners, Employees and Visitors to the City of Saint Paul:

In June 2017, the Human Rights and Equal Economic Opportunity (HREEO) Commission formed a Human Rights Division Audit Committee at the request of HREEO Director Jessica Kingston. The purpose of the project was to identify assets and gaps in Human Rights Division case management. We reviewed processes to produce recommendations to ensure greater efficiency, transparency, and accountability to better serve the community. The Audit Committee was comprised of five HREEO Commissioners and the HREEO Commission Liaison, with the assistance of the Saint Paul Innovation Team. The Audit Committee undertook a six-month review of the Human Rights Division. This report contains the detailed results of our audit.

We commend the Saint Paul HREEO Department for being leaders in racial equity work throughout the City and innovators for small-, women-, and minority-, owned business opportunities. The Audit Committee found many tasks the Division is accomplishing successfully and identified opportunities for improvement in other areas. We appreciate the cooperation and dedication of the Division employees. We look forward to working with the Department to implement our recommendations to ensure the future success of the Division and its stakeholders.

Melissa J. Houghtaling, JaPaul Harris, Erika Sanders, Maya Sheikh-Salah, & Maria Mitchell

HREEO Commissioners, Audit Committee

Letter from the Human Rights Division

Dear Residents, Business Owners, Employees and Visitors to the City of Saint Paul:

When the leaders of the City of Saint Paul were drafting one of the most progressive non-discrimination laws in the nation, the Saint Paul Human Rights Ordinance, they dreamt of a local government that would allow civilians to seek justice when faced with almost any form of discrimination. In 1990, our leaders passed a civil rights law protecting a broad array of personal characteristics because they believed in the principle that the Department of Human Rights and Equal Economic Opportunity (HREEO) still lives by today: all people deserve the opportunity to achieve their full potential free of discrimination.

Through the years, HREEO has expanded its reach and impact. Mandated to enforce the Saint Paul Human Rights Ordinance, the Human Rights Division provides mechanisms through which all people who believe they are discriminated against in the city of Saint Paul can file a complaint. Our team investigates those complaints, determines whether the evidence supports a finding of discrimination, and works to resolve these issues with financial and other remedies to compensate injured parties. In addition, we have moved beyond investigations, toward more proactive efforts to prevent discrimination before it happens. Through community outreach and awareness initiatives, the work of our bi-lingual human rights specialists ensures all non-English or limited English speakers are guaranteed access to the City of Saint Paul government services. Our agency has become a force for change in our community.

As leader of the Human Rights Division, I plan to embrace and expand this proactive role, while recognizing our most important duty continues to be administering justice when discrimination occurs. We will work to foster respect and collaboration across all groups by identifying commonalities, while celebrating the differences that make our city a vibrant and exciting place to be. The struggle to become a more open and just society has been a lengthy one, and there is still much work to do.

We encourage you to join us in furthering human rights in Saint Paul by advocating for those frequently targeted for discrimination, and by alerting HREEO when you believe a human rights violation has occurred within our borders. The staff of the Department of Human Rights and Equal Economic Opportunity is proud of its role in making Saint Paul a better place to live, work and visit, and we thank you for your support.

Yours in service,

Jessi Kingston, Director, HREEO

Jeffry Martin, Deputy Director, HREEO

Background

The purpose of the audit is to identify assets and gaps in case management and review processes to produce recommendations to ensure greater effectiveness, efficiency, transparency, and accountability in service to the community.

The HREEO Department experienced a transition in leadership within the Human Rights Division with the retirement of Deputy Director Readus Fletcher at the end of 2016. We welcomed new Deputy Director Jeffry Martin in 2017 which created an opportunity to review the processes and procedures of the Division to identify areas for improvement and innovation.

During the transition, staff and stakeholders identified process gaps and areas where the St. Paul Human Rights Ordinance was not consistently followed. Accordingly, the Commission determined a quality control audit would be appropriate to allow the department to review the findings and incorporate the recommendations of the audit committee.

The Audit Committee, comprised of five members of the HREEO Commission, led the audit process. Staff from the HREEO Division of Human Rights and the City of Saint Paul Innovation Team provided support to the Task Force.

The Audit Committee developed a project charter, audit framework, and materials to support the audit process. The six components of the audit include:

1. Staff interviews
2. Best practices research
3. Process mapping development and analysis
4. Investigative process review
5. Data analysis
6. External stakeholder engagement

Staff Interviews

Description

Members of the Audit Committee conducted in person or telephone interviews of Human Rights Division staff including:

- Four investigators
- Support staff
- Deputy Director
- Director

Area of Inquiry

- Understanding of operating systems, policies, and procedures
- Identification of assets and opportunities for improvement

Guiding Questions

- What statistics and metrics does the division use?
- What is the case management system?
- What are staff frustrations?
- What training is provided to staff?
- How do staff define success?
- Who are HREEO's customers?

The full list of interview questions is included in Appendix A.

Findings

- There is a need for more uniformity for training staff.
- The Division does not have clear processes and procedures and would benefit from developing clear guidelines for investigations, report writing, and training.
- There is no clear vision and focus for the Division that can be easily communicated to staff or the public.
- The findings and decisions are generally well reasoned and have sufficient supportive analysis.
- Investigators have received feedback from attorneys that the findings and supporting documentation are high quality.
- The timeline for issuing findings and decisions is not standardized. Many findings and decisions are not completed within a reasonable time frame.

- There is not a procedure to communicate to complainants about updates on their claim.
- The Division lacks a case management system.
- There is some collaboration amongst investigators and there are recent efforts to increase collaboration; however, there is acknowledgement that collaboration should continue to increase with the purpose of maximizing individuals' strengths for the whole team.
- Staff expressed an interest in increased Division outreach efforts to educate the community on the Division's services. That outreach would need to be accompanied with training to ensure it is effective.
- The lack of focus and strategic prioritization of specific outcomes has led to competition for time and resources between investigations and special projects.
- The total number of cases being processed has decreased.
- The number of staff investigators has decreased since the creation of the department.
- There is no metric in place to determine recommended caseloads per investigator. Absent the metric it is difficult to determine reasonable caseload per investigator.
- There are no criteria in place to assign cases based on investigator strengths or case complexity to ensure caseload equity.
- Each staff member expressed internal motivation to deliver a good product to the public and appeared invested in the Division's success, mission, and purpose.
- The Deputy Director is hands-on and has a legal background. He has subject matter expertise and has demonstrated competency in developing investigative staff.

Best Practices Research

Description

As a component of the HREEO Commission's audit of the Human Rights Division, the City of Saint Paul Innovation team conducted a review of best practices for agencies conducting human rights investigations. The purpose of this component of the audit is to understand benchmarks for performance and identify best practices for operating systems, policies, and procedures. The Innovation Team contacted leaders from a list of local and state organizations generated by HREEO Human Rights Staff and the Audit Committee. Five interviews were completed from September 1st through September 12th using an interview guide developed by the Innovation Team, with input from the Audit Committee. The interviews were conducted by phone and were 25 minutes to 60 minutes in length. A summary of the findings from the interviews is outlined below and a table of the data from the review is available in Appendix B.

Area of Inquiry

- Understand benchmarks for performance.
- Identify best practices for operating systems, policies, and procedures.

Guiding Questions

- How long does it take peer organizations to complete an investigation?
- What metrics do peer organizations use to measure success?
- Identify best practices for systems, policies, procedures.
- How often do peer organizations review performance and learn from review?

Findings

The review of other human rights investigatory agencies' best practices found the use of standard assessment forms, case grading templates; and customized case management systems with reminders and flags for deadlines. Many of the agencies have practices that monitor investigators' caseloads, supervise progress against timelines and conclude investigation of noncomplex complaints within 180 days and complex complaints within 360 days.

Process Map Development & Analysis

Description

Documentation of the process of a human rights investigation through a workshop with staff and staff analysis of assets and opportunities for improvement in the process.

Area of Inquiry

- Create visual depiction of the process
- Create shared understanding of the process
- Identify opportunities for improvement

Guiding Questions

- What should we keep/build upon?
- What is not working well?
- What ideas do we have for making this process work better?

Assets

- Pre-Determination Settlement Agreement Process
- Intake process
- Recently initiated one to one meetings between investigators and the Deputy Director

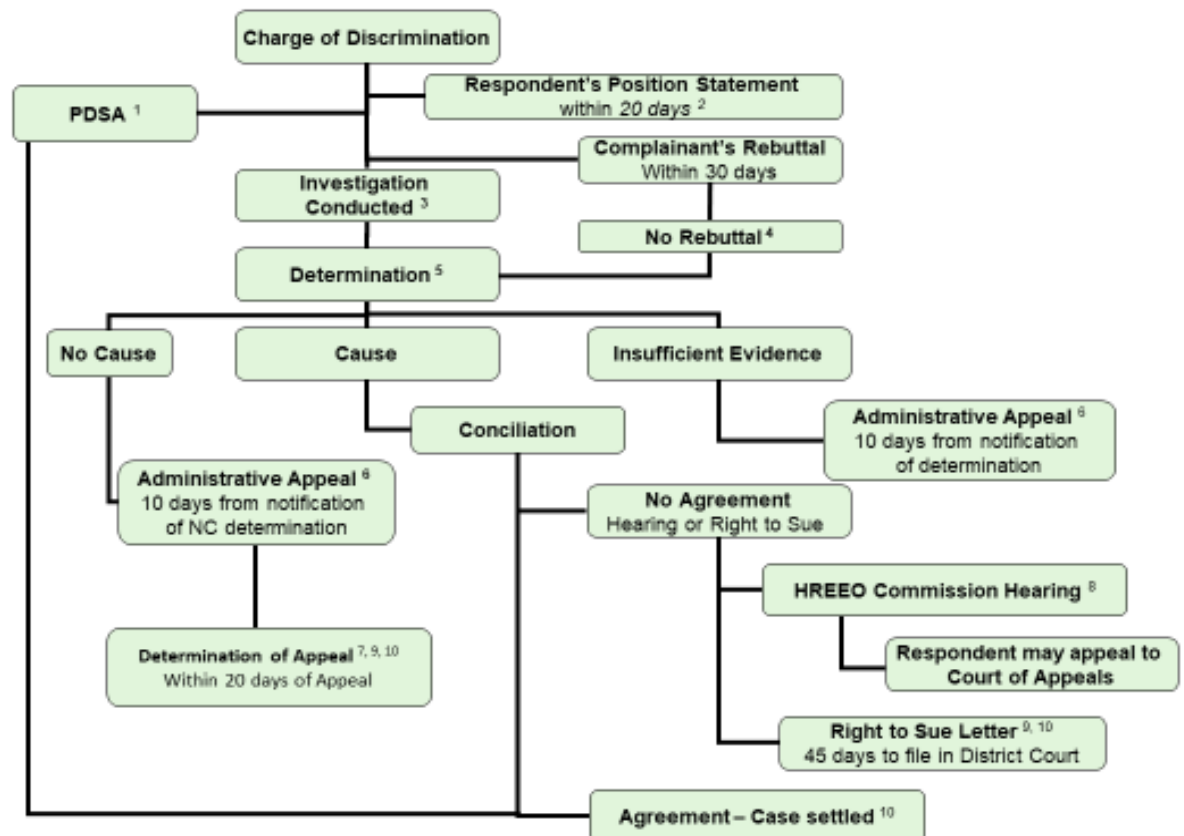
Opportunities for improvement

- Timeline for case acceptance and entering intake data needs standardization to decrease the processing time. The Deputy Director and Investigators need response time guidelines to move the process along with more expediency.
- Timeline for response for rebuttal should be enforced and monitored. Requested information from responsible persons or entities should be tracked to garner better compliance. Additional information required for witness interviews should be documented and tracked.
- Lack of response of parties impedes the ability of investigators to complete findings and decisions in a reasonable timeframe.
- There is information that is incomplete or absent from investigations.
- The Human Rights Enforcement System (HRES) database is inefficient, outdated, not user-friendly, and only available to the Office Assistant IV. HRES is unable to run all of the required reports. It is not useful as a case management system because it is only able to track the parties' contact information, type of case, and disposition. It does not

allow for a communication log, ticklers, and other features that would make it useful to investigators or the Deputy Director.

- There are no reminders or prompts in the case management system. Investigators would like a solution to include reminders that can be sent to multiple people to ensure timely and thorough inclusion of information.
- Clarity is needed for the Division's role and responsibility post- determination and during the appeals process.
- HUD requires the use of the HUD Enforcement Management System (HEMS) for housing cases that are cross-filed with HUD. Entering information into HEMS is time-consuming and duplicative; it requires information the Division tracks on its own database and spreadsheet to also be entered into the database. It also requires that much of the case file (phone log, communications, interviews, documents) be uploaded into the database.
- There is a need to develop a process for monitoring settlement agreements to ensure completion of training and other agreed upon remedies take place after the agreement has been signed.

Human Rights Investigations



Investigative Process Review

Description

Committee members conducted a review of a random sample of investigations by subject type to understand whether policy and procedure were followed and to identify errors.

Each committee member was assigned a random sample of ten Human Rights Division charges and determinations to evaluate which were filed between April 2015 and August 2016. A total of 50 investigations were reviewed.

Area of Inquiry

- Understanding of adherence to policy and procedure.

Guiding Questions

- What date was the case was filed?
- What date was a disposition letter issued?
- How much time elapsed between charge and disposition?
- What type of matter was involved?
- Was there a probable cause determination?
- Did the determination list the evidence and witnesses that were part of the record?
- What was the length of the determination issued?

Findings

- Length of time from when a case is accepted to disposition is too long.
- All the documents reviewed lacked a clear recitation of witnesses or exhibits relied on to make a determination. There was a lack of detail related to witnesses or exhibits. It was unclear at times where details included in the facts originated from. For example, did the information come from the complainant, an independent witness, or the organization being investigated?
- Investigators did not make credibility determinations on witness or party statements. For example, not expressly evaluating the existence or absence of credibility based on the consistency and lack of consistence of statements or their observations of demeanor.
- Legal analysis is generally thorough and detailed.
- There was an improvement in the quality of the final product after the current Deputy Director came on board because of his legal training and subject matter expertise.
- The level of detail between probable cause and no probable cause findings for cases is consistent and both appeared to be treated with equal import.

- Most of the final memoranda had a consistent format.
- Appropriate variety in length of memoranda; it appears that the length of the memorandum was commensurate with the complexity of the issue.

Data Analysis

Description

Analysis of case data to understand case volume, time to close, types of cases, etc.

Guiding Questions

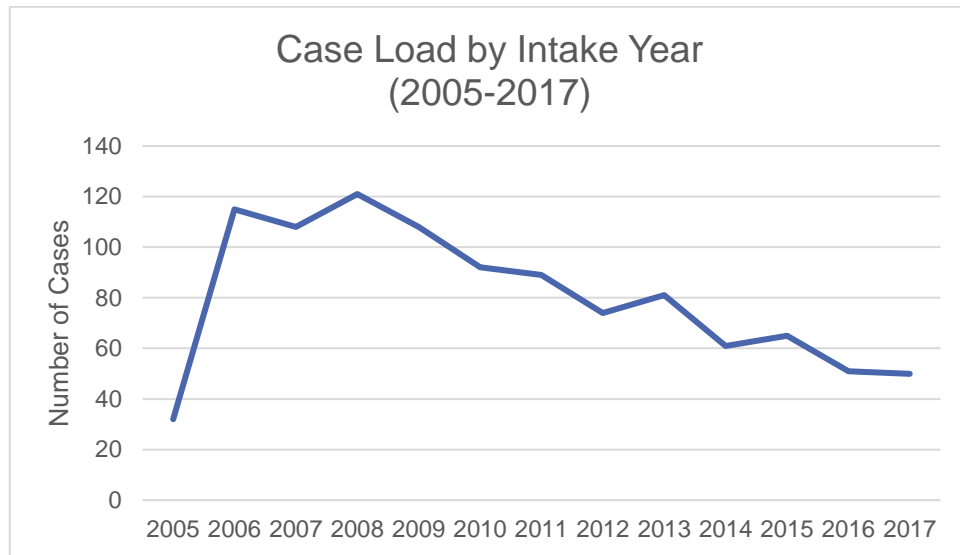
- Case volume
- Types of cases
- Time to close cases
- Trends from 2008- present

Findings

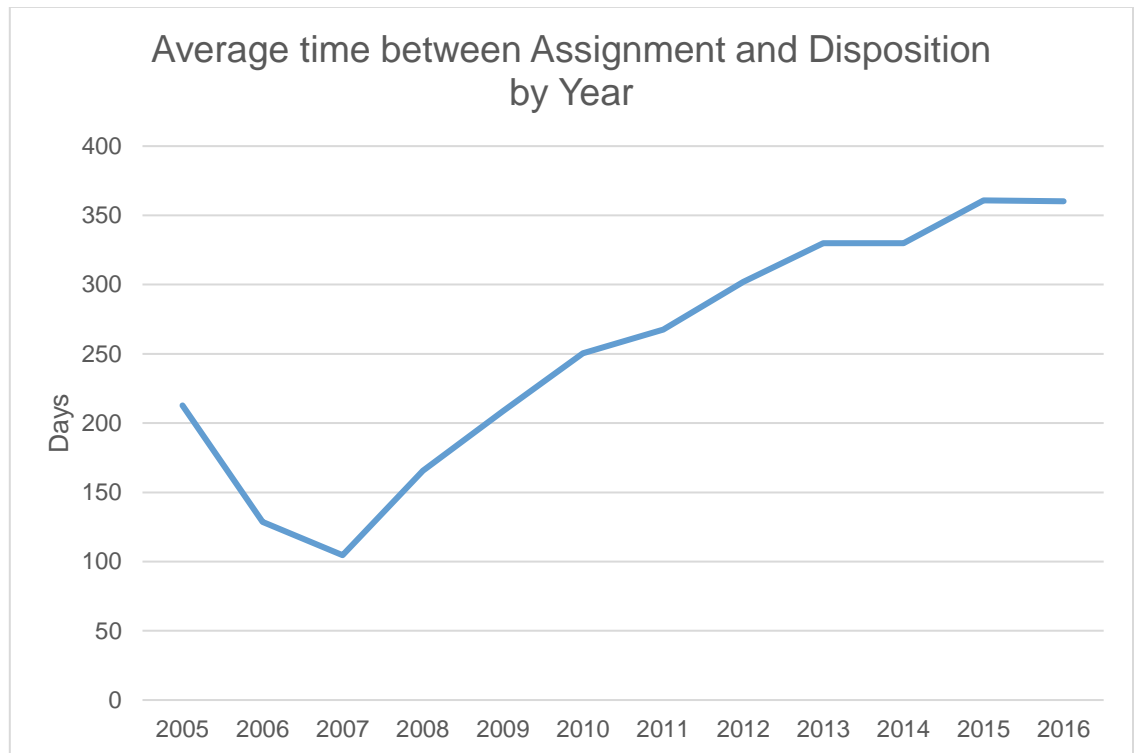
The City of Saint Paul Innovation Team analyzed data from a case log provided by the Human Rights Division, spanning cases from 2005 to present. Human Rights Division staff deleted identifying information from the log prior to sending.

The format of the case log and inconsistencies in coding of data caused challenges for analysis and may have introduced errors in findings and discrepancies in findings from previous reporting. Thus, these data analysis findings should be considered provisional.

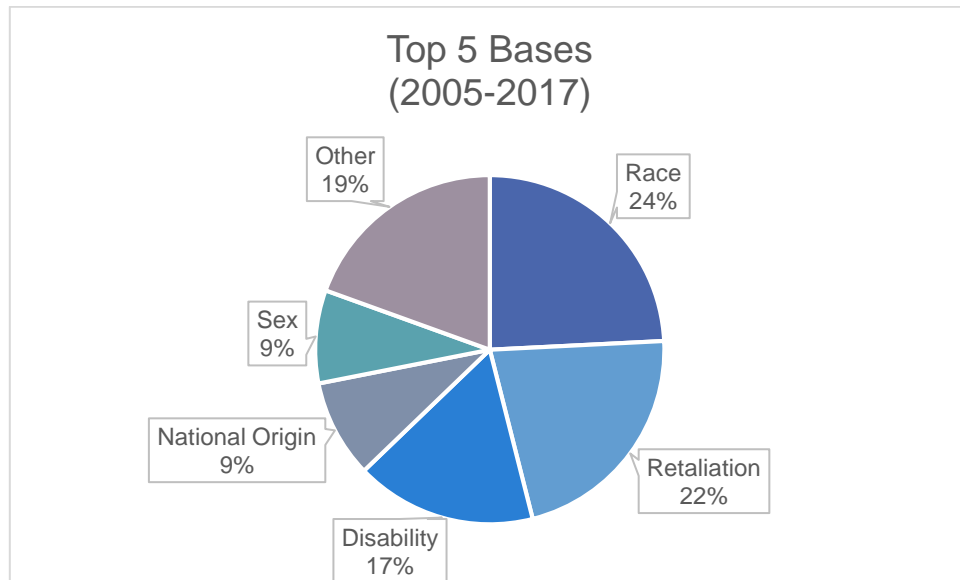
The primary finding from the data analysis is the need for improvement to data management practices. Simple changes to the case log, such as drop-down menus that standardize entries in fields, pivot tables, and elimination of multiple entries into single cells, would improve the ability of the Human Rights Division to monitor and analyze cases. Although the Audit Committee recommends a case management system as a finding of this report, simple interim changes to data management practices would yield improvements immediately.



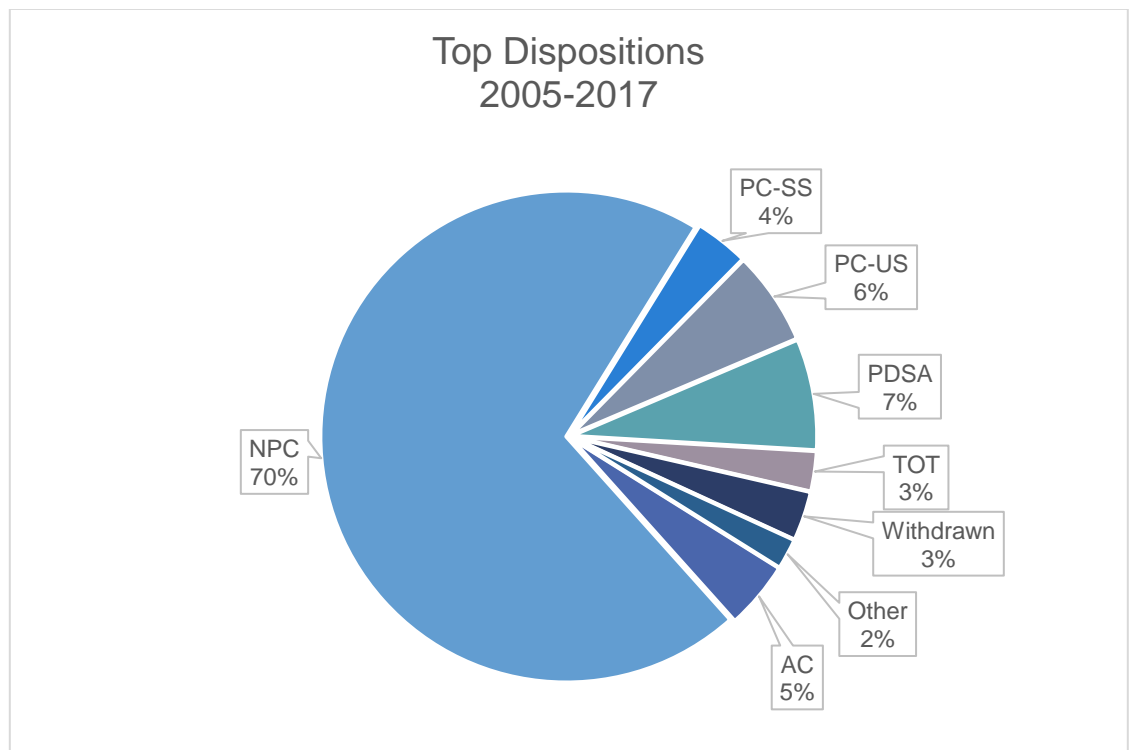
Case load by intake year has declined from a high of 121 cases per year in 2008 to 51 cases in 2016. There are 50 cases by intake date at the time of analysis.



Average time between the assignment of the case and final disposition has increased from a low of 100 days in 2007 to over 350 days in 2016. Initial data from 2017 indicates that the time to close cases has decreased in 2017.



The most common types of cases from 2005-2017 include as a basis race, retaliation, disability, national origin, sex, and other. Note that cases may include more than one basis.



The findings indicate that 70% of cases from 2005-2017 had No Probable Cause as the finding. 10% of cases included a Probable Cause disposition, 7% were resolved through a Pre-Settlement Disposition Agreement, and about 10% were withdrawn, transferred, or administrative closure.

External Stakeholder Engagement

Description

In-person or telephone interviews with external stakeholders and referring organizations—only one stakeholder responded to a telephone interview. An electronic survey was sent to 78 external stakeholders and referring organizations identified by Human Rights Division staff and HREEO Commissioners. 21 stakeholders responded, resulting in a 26% response rate.

Area of Inquiry

- Understanding of public perception of Human Rights Division services.
- Understanding of customer's experience.
- Identification of assets and opportunities for improvement.
- Identification of opportunities for collaboration.

Guiding Questions

- Understand customer/ stakeholder experience with Human Rights Division.
- What is working well?
- What is not working well?
- What ideas do we have for making this process work better?

Interview Findings

- Generally, the Division has been responsive to complainants.
- Persons interviewed had a working knowledge of the Division's services.
- Over last 1.5 years this stakeholder organization dealt with an issue related to timeliness, responsiveness, and lack of communication from the Division. The Human Rights Division accepted a complaint and then the complainant did not receive follow up communication for more than a year. The stakeholder organization intervened on behalf of the complainant to obtain the status of the complaint.
- The stakeholder organization interpreted this as an indication that investigations are not starting in a reasonable amount of time.
- The stakeholder organization expressed the perception that the human rights component of HREEO is less important than the contract compliance function.
- Respondent agency was satisfied with the Division's investigation, felt they were treated fairly during the process and investigation, and expressed faith in the process.
- The stakeholder organization has hosted presentations from the HREEO Director and Deputy Director to inform the agency and its constituents about HREEO's mission and

services. The stakeholder organization expressed that the Director and Deputy Director did a good job with outreach to their organization.

- The stakeholder organization expressed a desire for more community-wide outreach from the Division to educate people on the usefulness of the Division and its services.
- The stakeholder organization expressed a desire and willingness to partner with the Division to do education and outreach.
- The stakeholder organization expressed that overall the Director does a phenomenal job and is a conscientious leader and the Deputy Director understands the law and the community.

Survey Findings

- 42.86% of respondents indicated they are either “extremely familiar” or “somewhat familiar” with the City of Saint Paul Human Rights Division.
- 75% of respondents indicated that they have worked with the City of Saint Paul Human Rights Division.
 - 29% have referred an individual to file a complaint
 - 7% have filed a complaint themselves
 - 29% indicated the Division has provided training or education to their agency
 - 7% have assisted someone in filing a complaint
 - 14% were contacted related to an investigation
 - 42% indicated they had worked with the Division in another manner
- In response to a measure of customer satisfaction, respondents scored their likelihood of recommending the City of Saint Paul Human Rights to a member of their organization as a 7 on a scale of 1-10.
- Stakeholders provided the following information in response to a question about what changes the City of Saint Paul Human Rights Division could make to receive a higher rating:
 - *“Easier to contact at times. Possible increase of staff.”*
 - *“Outreach to spread the word at the agency/community level”*
 - *“Become more involved in community relations and work with other community organizations”*
 - *“It’s division that no one knows what they do!”*
 - *“From the position of representing a party which a claim had been filed against, it was frustrating and overly drawn out process that seemed eager to find cause (after more than a year, no cause was found).”*
 - *“More information about what the Human Rights Division can help with and how to contact them”*

- *“Better communication about what the services are provided, how the department could help individuals, and how they could contact the dept. How about a hotline?”*
- One respondent indicated that their clients are not as interested in filing a complaint as they are having their housing issues resolved.
- In response to a question regarding what the City of Saint Paul Human Rights Division does well, stakeholders responded:
 - *“Trying to find a fair and equitable solution to an issue.”*
 - *“Outreach, training and making you feel heard”*
 - *“Innovative, progressive, intentional, willing to work outside of their department for the greater good.”*
 - Several respondents indicated they were not familiar enough with the department to answer this question.
 - Several respondents answered that the Division does contract compliance well, indicating confusion between HREEO’s Human Rights and Procurement Divisions.

Recommendations & Conclusions

Training

1. Training opportunities for staff should be increased, including in-house training and out of department training.
2. The Division could benefit from an updated training manual.
3. Develop minimum training expectations – a list of trainings to be attended by all employees and frequencies of training.
4. Create an orientation for new employees with the expectation that all staff know processes of investigation, understand customers, mission, and scope of the department.
5. Develop basic procedures for investigation and findings to ensure consistency.
6. Stagger employee reviews to identify competencies and growth potential. Set review schedule at the start of the year so employees know when their review will take place, the emphasis should be on quality of feedback and employee development.

Case Management

7. The Division should implement a case management system that helps investigators conduct and record their activities in a more consistent, timely way. Forms, timelines and benchmarks used during an investigation should be standardized to the greatest extent possible.
8. Implement regular monitoring of reports about case times, caseloads, etc. to monitor processes.
9. When cases reach 180 days, the Deputy Director should become involved to help resolve issues and ensure timeliness.
10. Develop a timeline, protocol for complainant communication (check-ins).

Outreach & Marketing

11. The Division should develop an outreach plan that includes clear messaging to stakeholders, goals for types of outreach (community contacts, presentations/training to external audiences, tabling at events, etc., to a full cross-section of Saint Paul community stakeholders), identification of staff outreach roles. This plan should include targets for community outreach and identify indicators of success.
12. Improve understanding/ education of the department and distinction between contract compliance and human rights.
13. Create a position for community outreach that will also train employees on communicating with stakeholders.
14. Create a marketing campaign to further inform people about the services offered by the department.
15. Create a way to document and showcase the Division's successes.

Case Documentation & Quality Control

16. Include in final memo the description of number and type of witness interviews.
17. Include a procedural history in each final memorandum, including:
 - 17.1 All collateral contacts,
 - 17.2 Identified evidence reviewed,
 - 17.3 Contact events with witnesses.
18. Review of cases should take place at least annually to ensure SOPs are being followed.
19. Staff should continue to meet regularly to share information and assistance with one another.

Strategy

20. The Division should develop a clear vision for success, shared by all staff, and ensure that all activities support that vision.
21. The department should engage in strategic planning to ensure alignment and potentially narrow down the number of special projects to focus on core competencies.

Subpoena Power

22. The Division should use all resources at disposal, including invoking power of subpoena.

Conclusions

As guardian of the civil rights delineated in the City of Saint Paul Human Rights Ordinance, the Human Rights Division holds great responsibility and potential for creating a City that is fair, just, and inclusive for all residents. Our Human Rights Ordinance is one of the strongest in the United States. Nonetheless, not all Saint Paul residents have access to equal opportunities in housing, employment, education and other areas, and these inequalities harm individuals, families, businesses, neighborhoods, and our City as a whole.

In order for Saint Paul residents to have the fullest possible benefit from the protections of the Human Rights Ordinance, the Human Rights Division must be capable of engaging in vigorous, timely enforcement of the Ordinance. When victims of unlawful discrimination achieve meaningful legal remedies, the positive outcomes extend beyond the individual complainant, opening up doors of opportunity for many others. Further, an effective Human Rights Division must have the capacity to engage in proactive activities in order to prevent violations of the Ordinance, to increase public understanding of the Ordinance's protections, and to be a voice on matters of equity and justice that affect the entire City.

The Human Rights Division is poised to fulfill these roles well, despite some past and current deficits. As noted in this report, Division staff are highly motivated to further the Division's mission and purpose; creating an environment in which they have the proper tools to support success in the work that lies ahead. Standardization of many case management and recordkeeping procedures, development of clear expectations and plans, clarification of staff roles and responsibilities will address shortcomings identified in this audit. The twenty-two specific recommendations developed by the Audit Committee are intended to assist in effectuating these broad goals in the coming months.

Appendix A: Staff Interview Questions

1. Ice breaker question
2. If someone contacts the Human Rights Division, what happens?
3. How do you screen inquiries?
4. Please describe your approach at the intake meeting.
5. What is the process for assigning cases?
6. Can you walk me through the process of a human rights investigation?
 - 6.1 Who is involved? (brainstorm about all roles involved in the process)
 - 6.2 Is there any existing documentation for this process?
 - 6.3 What is your approach to managing your caseload?
 - 6.4 Would you like a case management system?
 - 6.5 How do you track the investigation benchmarks?
 - 6.6 Are there expectations around how long an investigation takes?
 - 6.7 Who provides support?
 - 6.8 What documentation or instructions are required?
 - 6.9 What tools are used to complete this task?
 - 6.10 How do you decide which witnesses to interview?
 - 6.11 How do you determine what questions to ask a respondent, witness, complainant?
 - 6.12 What often is hardest part of an investigation?
 - 6.13 What part takes the longest?
 - 6.14 What is the easiest?
 - 6.15 How do you know when an investigation is complete?
 - 6.16 If you get stuck during an investigation where do you for help?
7. How does the Department define a successful investigation?
8. What role does your supervisor have in the investigation process?
9. How do you define success for an investigator?
10. What is working well in the process of a human rights investigation?
11. What challenges do you face?
12. What improvements do you think could be made?
13. What assets does the Human Rights Division have?
14. How could the process be streamlined?
15. Who are your customers?
16. How might the process be improved to better meet customer needs?
17. What interaction/communication do you have with the public?
18. What training do staff receive? Do you feel you have received the training necessary for your position and whether there are any trainings or opportunities that would allow you to grow and develop expertise?

19. What is the process for reviewing performance? Has it shaped your approach to your work? If so, how?
20. What might be holding staff members back from performing more effectively?
21. Is there anything I haven't asked that I should have?
22. Is there anything you'd like to add?

Appendix B: Best Practice Data

Agency Type	Staffing	Caseload	Goals/ Benchmarks	Case Management System	Other practices
Regional EEOC	8 Investigators	80-90 cases per investigator, triage cases by scoring	No specific goals or benchmarks for closing cases, beyond statute	Case management system that was created for them	Use a standard assessment form, models of proof to educate complainants of process, and use case grading system to determine assignment to more or less senior staff
City Human Rights Dept	4 Investigators, 1 admin analyst who does intake	15-20 cases per investigator	270 days with a mediation cut out	Clunky practice manager software, doesn't do alerts for timelines	Use a case grading system to determine assignment, and have senior staff review every case for quality control
State Agency	50-60 total staff including 30 investigators, admin, and an intake unit	Average case loads 30-35	Use a score card model with interim benchmarks/goals. Once in investigation goal is 180 days.	Had a system created for them, currently undergoing modernization.	Investigators can request a reduction in case load for community outreach.

Agency Type	Staffing	Caseload	Goals/ Benchmarks	Case Management System	Other practices
			Investigators expected to complete a certain number of cases per month based on grade (7 for senior) and do a certain number of fact-finding conferences (19 for senior).		
State Agency	43 case investigators, 8 supervisors, 8 intake investigators, 3 full time mediators.	Depends on level of investigator. 1-2s can be assigned up to 7 cases per month, max is 37 3s can be assigned 6 cases per month, max is 27	Interim and final goals are in statute and dependent on case type, 180/ 360 days	As400, seeking new software	Supervisors run reports and meet with staff individually to assess caseload, progress against timelines, etc Fact finding conferences required
State Agency	14 investigators, intake done on rotation	Currently total is about 700 cases, about 50 per investigator depending on level	Case complete within one year for complex cases, for not complex cases 180 days. 6 case determinations	Onbase, "Case management system helps with efficiency because anyone can look at case status at any time.	Use templates by case type to determine complexity and required information. Cases assigned to more or less senior staff based on

Agency Type	Staffing	Caseload	Goals/ Benchmarks	Case Management System	Other practices
			must be completed each month	Flags for deadlines.	case complexity.

Appendix D: External Stakeholder Engagement Interview & Survey Questions

Interview Questions

1. Please tell me about your organization's mission and programs.
2. Please describe your understanding of the services provided by City of Saint Paul's Human Rights Division.
3. Has your agency worked with the City of Saint Paul's Human Rights Department in the past? If so, in what capacity? [Prompts: partnered on outreach, referred individuals for more information, referred individuals with potential discrimination cases]. If not, why?
4. Now, tell me about your experience with the City of Saint Paul's Human Rights Division.
5. What have you heard from your customers/ members about the City of Saint Paul's Human Rights Division?
6. What do you believe the Human Rights Division is doing well?
7. What do you believe are opportunities for improvement/growth for the Human Rights Division?
8. What other agencies do you partner with or do referrals to for Human Rights issues or complaints? Have you considered working with City of Saint Paul Human Rights Division? If so, how? If not, why?
9. What advice would you give Human Rights Division leaders as they work to ensure greater efficiency, transparency, and accountability in service to the community?
10. Is there anything else you would like for us to know?

Survey Questions

1. How familiar are you with the City of Saint Paul Human Rights Division?
 - Extremely familiar
 - Very familiar
 - Somewhat familiar
 - Not so familiar
 - Not at all familiar
2. Have you or your agency worked with City of Saint Paul's Human Rights Division?
 - Yes
 - No
 - I'm not sure
3. Please describe how you or your agency has worked with the City of Saint Paul Human Rights Division:

Appendix D: External Stakeholder Engagement Interview & Survey Questions

- I referred an individual to the Division to file a complaint
 - I filed a complaint myself with the Division
 - The Division provided training or education to my agency
 - I assisted someone in filing a complaint with the Division
 - I was contacted by the Division related to an investigation
 - Other (please specify)
4. Please describe why you or your agency has not previously worked with the City of Saint Paul Human Rights Division:
- Not likely
 - Extremely
 - likely
5. How likely is it that you or your agency would recommend the City of Saint Paul Human Rights Division to a member or constituent of your organization? (Please rate your choice on a scale of 1-10, with 1 being “not likely” and 10 being “extremely likely.”)
6. What changes would the City of Saint Paul Human Rights Division have to make for you to give it a higher rating?
7. What does the City of Saint Paul Human Rights Division do really well?
8. Do you have any other comments, questions, or concerns?