



Racial Equity Assessment Toolkit

Project/initiative Name: Code Enforcement Racial Equity Impact Assessment

Department: Safety and Inspections (DSI)

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This is a:

☐ Policy

☐ Program

☒ Initiative

☐ Budget Issue

Step 1. Set Outcomes.

Leadership communicates key community outcomes for racial equity to guide analysis.

1a. For your department, what are the most important racial equity community outcomes related to the issue?

The Department of Safety and Inspection's mission is "to preserve and improve the quality of life in Saint Paul by protecting and promoting public health and safety for all". The Code Enforcement Division of the department is responsible for ensuring the safety of and maintaining/improving the livability of owner occupied properties within the city.

This assessment is being conducted to "analyze the summary abatement service using the City's racial equity impact assessment tool to identify potential for race-based disparities and identify solutions for those disparities by 12/31/2018." Outcomes include:

- Ensure that Summary Abatement services are dispersed equitably across the city are occurring in all areas of the City and there are no gaps or over burdens in communities of color.
- Ensures we are helping keep our neighborhoods clean, managing vacant buildings to reduce negative impacts, support reinvestment, and reduce the number of vacant buildings.
- Improve communication and involve with communities in Code Enforcement services.
- Increase educational opportunities for all Saint Paul communities.
- Decrease the number of potential unnecessary burdens for all property owners.
- Decrease the racial disparity in City services.

1b. What is your proposal and how does your proposal relate to these outcomes?

1. Analyze all the 2017 data available for: 1) tall grass and weeds; 2) snow walks; 3) garbage/rubbish; and 4) vehicle abatements.
2. Focus is on complete Summary Abatement services.
3. Map the data against the current demographics of the City of St. Paul including comparing it to current census data.
4. Engage the stakeholders and communities in interpreting the data, hearing from residents on new ways that enable equitable distributions and soliciting ideas for improving services.
5. Identify any potential gaps in services and internally discuss possible solutions. Review resource allocation in certain areas of the City (percentages/raw numbers).
6. Propose service or ordinance changes.
7. Inform the stakeholders and communities of upcoming service/program improvements.
8. Implement approved service or ordinance changes.

1c. Which racial equity opportunity area(s) will this primarily impact?

- | | |
|---|--|
| <input type="checkbox"/> Community & Economic Development | <input type="checkbox"/> Contracting Equity |
| <input type="checkbox"/> Public Works | <input type="checkbox"/> Workforce Equity |
| <input type="checkbox"/> Environment/Sustainability | <input type="checkbox"/> Fire |
| <input checked="" type="checkbox"/> Public Safety | <input checked="" type="checkbox"/> Safety and Inspections |
| <input type="checkbox"/> Jobs | <input type="checkbox"/> Education /youth work |
| <input checked="" type="checkbox"/> Housing | <input type="checkbox"/> Parks and Recreation |
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Other: _____ |

Step 2. Involve stakeholders. Analyze data.

Gather information from community and staff on how the issue benefits or burdens the community in terms of racial equity.

2a. Are there impacts on specific geographic areas? X - Yes No

Check all neighborhoods that apply (*see City map on page 7*):

- | | |
|--|---|
| <input checked="" type="checkbox"/> All Saint Paul neighborhoods | <input type="checkbox"/> Macalester-Groveland |
| <input type="checkbox"/> Capitol River/Downtown | <input type="checkbox"/> North End/South Como |
| <input type="checkbox"/> Como | <input type="checkbox"/> Payne-Phalen |
| <input type="checkbox"/> Dayton's Bluff | <input type="checkbox"/> St. Anthony Park |
| <input type="checkbox"/> Eastview/Conway/Battle Creek/Highwood Hills | <input type="checkbox"/> Summit Hill |
| <input type="checkbox"/> Frogtown/Thomas-Dale | <input type="checkbox"/> Summit-University |
| <input type="checkbox"/> Greater East Side | <input type="checkbox"/> Union Park |
| <input type="checkbox"/> Hamline-Midway | <input type="checkbox"/> West 7th/Fort Road |
| <input type="checkbox"/> Highland | <input type="checkbox"/> West Side |
| <input type="checkbox"/> Outside of the city (please explain): | |

2b. What are the racial demographics of residents in the area or who are impacted by the issue?

See City neighborhood demographic data maps on pages 6, 7, and 8 of this proposal.

2c. How have you involved community members and stakeholders in discussing, planning, developing or reviewing this proposal? Please provide details. If you have not yet involved the community members and stakeholders in discussing, planning, and developing this proposal, how do you plan to do so?

Surveyed over 1000 property owners who recently received a summary abatement notice targeting neighborhoods with people of color demographics. Survey content below:

Code Enforcement Racial Equity Impact Assessment Survey

The City of Saint Paul, Department of Safety and Inspections (DSI) wants to ensure we are providing our services fairly across the city, regardless of the race, color, religion, creed, nationality, sexual orientation or other statuses of our customers.

As you are aware, you have received a notice from DSI to correct a violation on your property. While we understand this notice can be unpleasant to receive, we are asking for your help to make this service better in the future.

Please complete the anonymous survey and return to city, by mail, through the U.S. Postal Service (no postage required).

1. Was the notice you received easy to understand? Yes or No (circle one)
2. Was it clear who to contact if you had questions? Yes or No (circle one)
3. What can we do to make this city service better? _____
4. Do you identify yourself as a person of color? Yes or No
5. Do you believe these services are fair, regardless of your race? Yes or No
 - a. If no, why not? _____
6. Please circle your zip code. 55101 55102 55103 55104 55105 55106 55107 55108
55114 55116 55117 55119 55130

Thank you for participating in this anonymous survey. The City of Saint Paul is dedicated to improving our services for all!

Survey Results were summarized in appendix A.

1. Partnered with the North End Neighborhood Association and held a community input forum on 4-24-19. The survey was initiated by North End ahead of the meeting. Community was updated via [power point](#) (Appendix B) on City and DSI equity initiatives and Code Enforcement program and services. Nineteen members of the community came to participate. Engagement included three questions:
 - a. How does the Summary Abatement service help or hurt the community?
 - b. Is this service fair to those who live in these neighborhoods? Why/why not?
 - c. How can we better help keep neighborhoods clean, safe and of high value to those who have chosen to live there? Please share your ideas!
2. Partnered with the West Side Community Organization and held a community input forum on 6-11-19. The survey was initiated by West End ahead of the meeting.

Community was updated via [power point](#) on City and DSI equity initiatives and Code Enforcement program and services. Forty two members of the community came to participate with two members choosing to focus on our topic directly. Engagement included three questions:

- d. How does the Summary Abatement service help or hurt the community?
- e. Is this service fair to those who live in these neighborhoods? Why/why not?
- f. How can we better help keep neighborhoods clean, safe and of high value to those who have chosen to live there? Please share your ideas!

2d. What do your conversations with external stakeholders and data you've gathered tell you about existing racial inequities in the targeted community? Be specific.

Code Impact Assessment – Summary of Survey Responses and Notes from Two Meetings

Communication

- Police rattle off the code (people don't understand) something with them.
 - Photos in notices
 - Plain Language (graphical)
 - Multiple language notice or flyer– language line, 2nd page
 - Add resources to notices, 2nd page, pre-printed backside
- Initiate a supervisor/inspector ride-along requirement as part of inspector's annual performance review process
- Inspectors not calling back
 - Address the staff that this is happening
 - Clarify return phone calls are the next business day
 - Cell phone numbers on Abatement Notices
- Method for Customers to rate inspectors
- Civilian Review Board
- Ensure inspectors are informed of other changes in the City that affect their program, i.e. new garbage ordinances and date changes. Have them get to know the haulers and dates in the neighborhoods they serve so that they are not issuing citations on the same day as haulers are expected.
- Change the name from Code Enforcement to ? so it isn't so intimidating
 - NHPI – Neighborhood Housing and Property Improvement
 - Neighborhood Support
 - Code Inspections
 - Research Other Cities
 -
- Door Hangers
 - Great idea – let's implement – tall grass and weeds, snow, garbage
- Increased citywide trash cans and trash haulers
- Community Clean Up day
- Bulk item sticker program (hailed away on a specific day so they don't get cited)
 - Bring to city attorney's office for future consideration

- Garbage on the ground change
- Door knocks first
 - Great idea – safety concern?
 - Capacity concerns
 - Categorize complaints
 - Create a tiered response matrix, start with site visit first
- Ensure all new Code staff receive? hours of classroom training as well as field inspection experience prior to completing independent inspections
 - Staff verification first
- Revamp and update customer website
- Rewrite letters in plain language, more languages and more pictures
- Who to call when I don't understand the letter
- Customer Service training for new inspectors
- More safety-related materials for Hmong residents (fire alarms, etc.)

Provide solutions not penalties

- Have a Neighborhood Dumpster program (like other cities)
 - Sweeps in coordination with District Councils
 - Collaboration with VISTA project
- Explain Roles of State, County, City of Saint Pauls, prior to conducting the inspection
 - Pictures
- Provide resource contacts (community groups that are available to help) right on the Summary Abatement Notice
- Explain how/why the summary abatement program is a safety concern (don't get the connection)
- Program for seniors, people with disabilities or unable to clean up. Volunteers? (Serve Saint Paul, database)
- Litter lectures in schools
- Training on local standards of cleanliness
- How long the Summary Abatement remains on file – available to public
- Standards (rules of thumb) grass cut once per week, how high should your grass not be, shovel after every "inch" snowfall, etc.
- Code campaign along with building safety month.
- Incentive program
- Bring back neighborhood resolution centers – create a new model through district councils

Inspections must be addressed using an equity model rather than an equality one

- Constant Complainers – do something different – mentioned many times
 - a. Ask people for their name? Do you want to give your name?
 - b. Quick Hit: Create a system in Amanda to flag addresses with chronic complaints, require supervisors to validate.
- District Council best vehicle to work on chronic cases/repeat circumstances
- Warning before a citation is given
- Penalty process is too aggressive

- Reduce the time the penalty stays on a person's record (what happens when property is sold)
- Rate the inspector
- How to we remove summary abatements from the system? (City Attorney)
- Want to find out if the complaint was generated from a field find

Step 3. Benefits or Burdens

Given what you have learned from data and from stakeholder involvement...

Three themes emerged from data analysis and community engagement which, when address, could be a:

- 1) Improve the quality and tone of communications
- 2) Focus on solutions, not penalties
- 3) Ensure system is not abused to foster discrimination

Step 4: Short- and Long-Term Strategies to Eliminate Inequities

Develop strategies to create greater racial equity or minimize unintended consequences.

4.a. What are your short-term strategies to reach your desired racially equitable outcomes? How will you measure and track your progress?

- 1) Improve the quality and tone of communications
 - a. Photos in Correction Orders and all Summary Abatement documents
 - b. Complete plain language assessment and implement changes on following documents:
 - i. Summary Abatement letter
 - ii. Correction Orders
 - iii. Tall Grass and Weeds
 - iv. Snow Walk
 - c. Provide informative, non-threatening door hangers educating owners/occupants on conditions that may lead to a violation
- 2) Focus on solutions, not penalties
 - a. Add 'resources' document to all CE mailings
 - b. Collaborate with Mayor's Office VISTA program
 - i. Provide real-time notification to program participates on open CE orders
 - ii. Collaborate with Hearts and Hammers and Habitat for Humanity existing assistance programs
- 3) Ensure system is not abused to foster discrimination
 - a. Develop a system to prevent anonymous complaints from generating excessive and inappropriate notices sent to building owners and occupants
 - i. AMANDA 'quick hit' will flag third unfounded complaint in a rolling 12 month period

- ii. Complaints generated in the following 24 months would notify Code Enforcement supervisors
- iii. Supervisory staff will investigate each complaint before issuing an notice to correct.

4.b. What are your long-term strategies to reach your desired racially equitable outcomes? How will you measure and track your progress?

- Continue to monitor compliance rates, pre and post updating notifications, door hanger implementation and use of ‘resources’ document
- Track utilization of Mayor’s Office Vista Program
 - Document individual successes
- Track usage of ‘quick hit’ as described above to assist in documenting and verifying extent to which Code Enforcement services are abused. This will support future enhancements of this division’s work.

Step 5. Raise Racial Awareness. Be Accountable.

Track impacts on communities of color overtime. Continue to communicate with and involve stakeholders. Document unresolved issues.

5a. What issues or racial inequities are unresolved? What resources/partnerships do you still need to make changes?

Long term strategies should bring up any inequities that are not currently addressed in short term strategies. Continued partnership with City Office of Technology and Communication is crucial to ensure data and technology resources are available to track outcomes.

5.b. How will you share information learned from this analysis with your department? How will you raise awareness about racial inequity related to this issue at the city?

Results of this impact assessment will be shared in November 2019 to engage implementation plan and strategies moving forward. Assessment and outcomes are on the agenda for the 2020 DSI All Staff meeting on February 13, 2020 and will be sharing with the Citywide Equity Change Team by December 5, 2019.

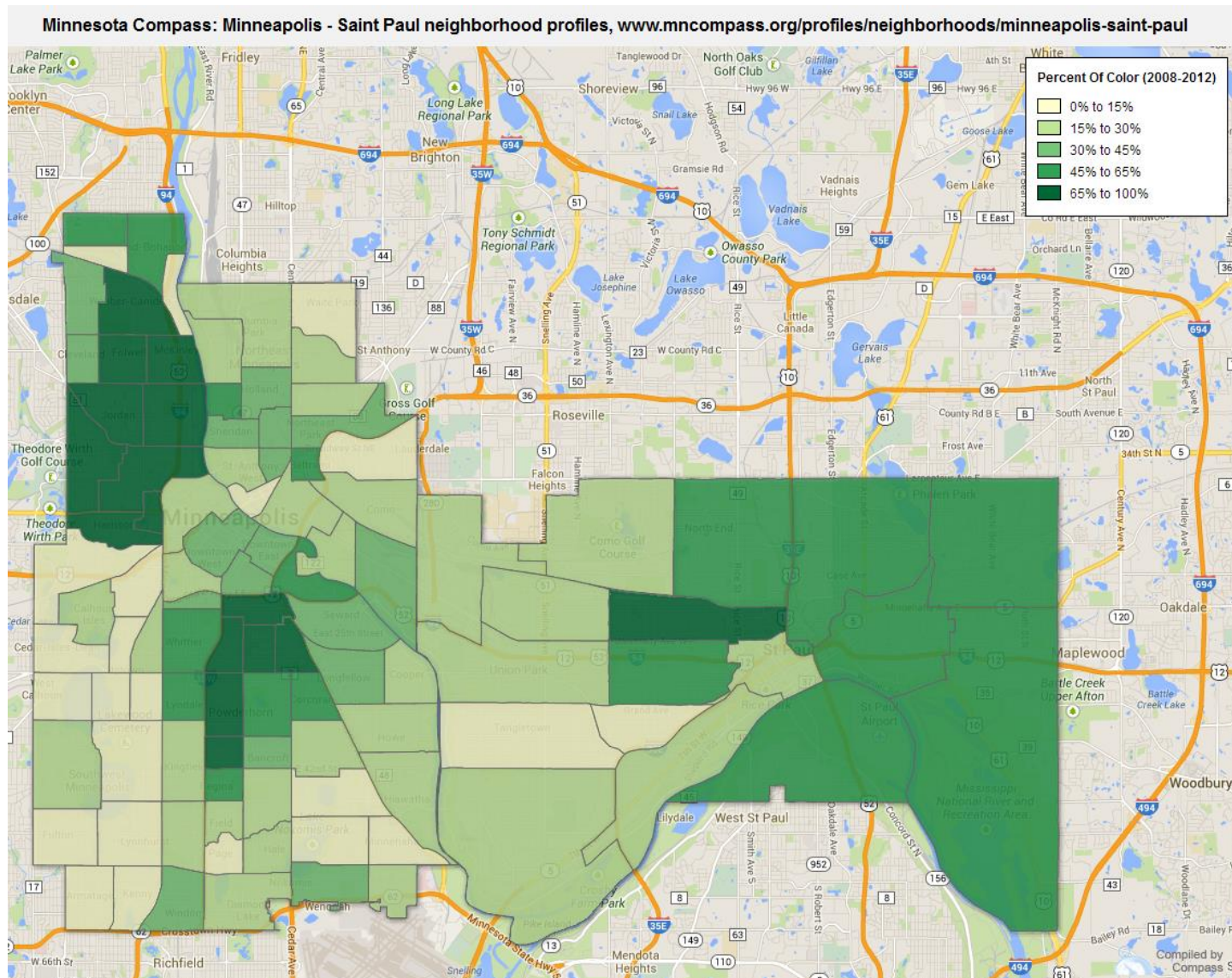
5. c. How will you share your analysis and final plan or proposal with community stakeholders?

- Two community partners will be e-mail a thank you, copy of full report and a draft communication that is being sent to all community stakeholders that attended the two sessions we held.
- Communication to stakeholders will include a thank you and the recommendations (short and long term) that we will be working on.
- The full report will also be shared on DSI’s website.
- Follow-up on year from now will take place with our partners and our website will be updated as the recommendations are implemented.

Neighborhood Demographic Table

Neighborhood	Planning District (St. Paul geographies only)	Total Population	Total Population - share of respective city's population	Not Hispanic or Latino	White (non- Hispanic)	Black or African American (non- Hispanic)	American Indian and Alaska Native (non- Hispanic)	Asian or Native Hawaiian and Other Pacific Islander (non- Hispanic)	Some Other Race (non- Hispanic)	Two or More Races (non- Hispanic)	Hispanic or Latino
Eastview/Conway/Battle Creek/Highwood Hills	1	20,453	7.2%	88.8%	47.8%	20.3%	0.6%	16.6%	0.2%	3.2%	11.2%
Como	10	11,913	4.2%	96.1%	82.6%	5.4%	0.4%	4.8%	0.2%	2.6%	3.9%
Dayton's Bluff	4	16,434	5.8%	85.0%	39.5%	16.2%	1.3%	23.8%	0.1%	4.1%	15.0%
CapitolRiver/Downtown	17	7,057	2.5%	95.3%	70.6%	16.0%	0.9%	4.9%	0.2%	2.8%	4.7%
Greater East Side	2	27,206	9.5%	86.8%	42.6%	14.3%	1.0%	24.9%	0.2%	3.8%	13.2%
Hamline-Midway	11	11,496	4.0%	93.8%	68.8%	15.0%	0.9%	5.3%	0.2%	3.6%	6.2%
Highland	15	24,078	8.4%	95.2%	78.9%	10.0%	0.3%	3.7%	0.3%	2.0%	4.8%
Macalester-Groveland	14	19,546	6.9%	97.2%	89.6%	1.9%	0.3%	2.9%	0.1%	2.3%	2.8%
Union Park	13	18,405	6.5%	95.6%	77.8%	11.1%	0.5%	3.2%	0.1%	2.9%	4.4%
North End/South Como	6	25,447	8.9%	89.8%	38.5%	21.5%	1.2%	24.5%	0.1%	4.0%	10.2%
Payne-Phalen	5	30,700	10.8%	86.3%	35.0%	15.9%	1.2%	30.6%	0.1%	3.7%	13.7%
St. Anthony Park	12	7,674	2.7%	96.8%	74.0%	8.6%	0.6%	11.0%	0.2%	2.4%	3.2%
Summit Hill	16	6,574	2.3%	96.7%	89.0%	2.9%	0.2%	2.4%	0.1%	2.1%	3.3%
Summit-University	8	17,002	6.0%	95.4%	46.1%	35.0%	0.7%	9.8%	0.2%	3.5%	4.6%
Frogtown/Thomas-Dale	7	15,041	5.3%	90.4%	21.1%	29.8%	1.1%	34.1%	0.3%	3.9%	9.6%
West 7th/Fort Road	9	11,083	3.9%	92.1%	73.6%	10.8%	1.0%	3.3%	0.1%	3.4%	7.9%
West Side	3	14,959	5.2%	69.4%	45.3%	11.8%	1.1%	7.9%	0.2%	3.3%	30.6%
City of St. Paul	X	285,068	100.0%	90.4%	55.9%	15.3%	0.8%	14.9%	0.2%	3.3%	9.6%

Data source: Minnesota Compass - The data come from the U.S. Census Bureau, 2010 decennial census (demographic data including total population, race and ethnicity, as well as housing units and types of households);

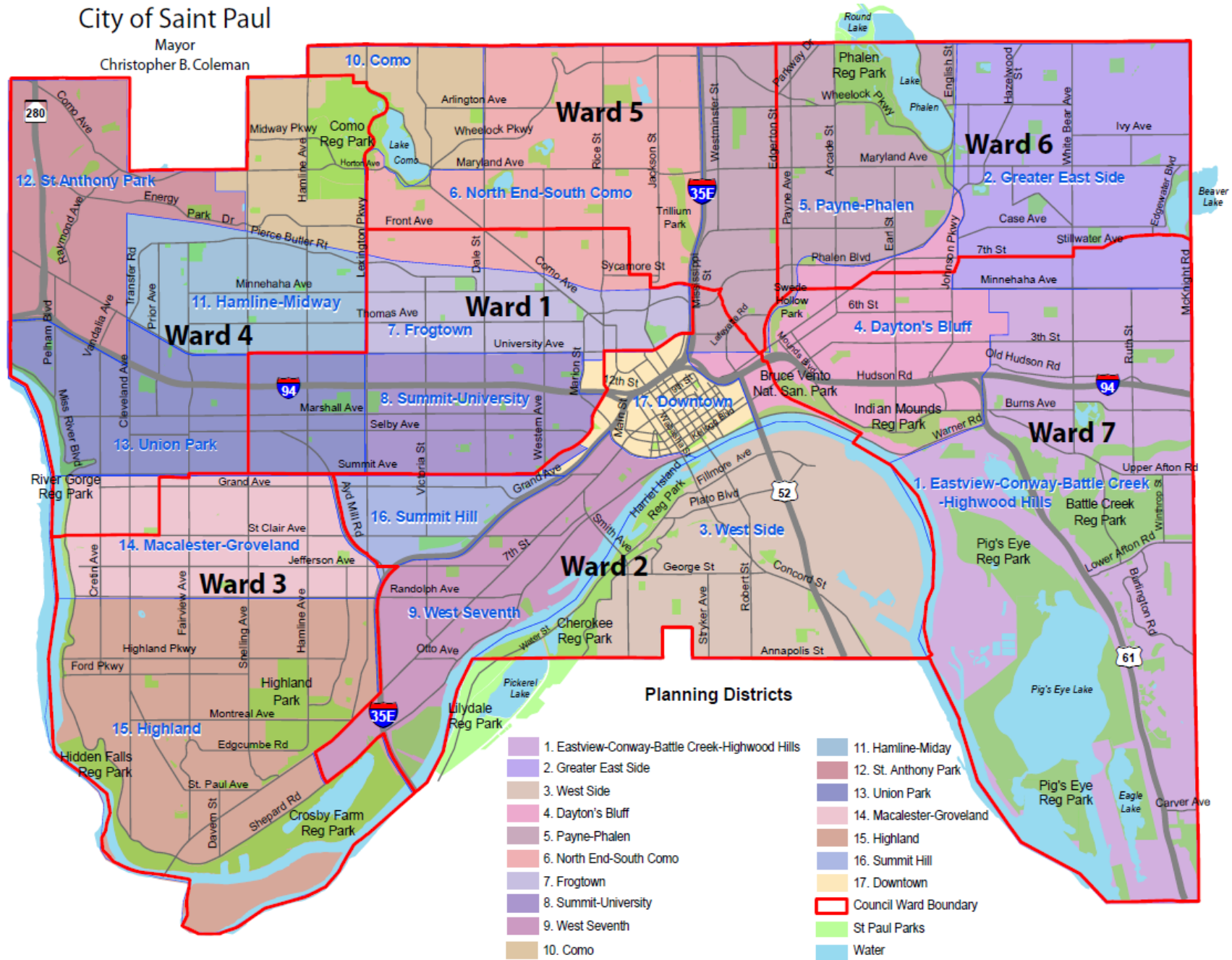


Data source: Minnesota Compass - The data come from the U.S. Census Bureau, 2010 decennial census (demographic data including total population, race and ethnicity, as well as housing units and types of households);

Access the interactive map at: <http://www.mncompass.org/profiles/neighborhoods/minneapolis-saint-paul#!/percent-of-color>

City of Saint Paul

Mayor
Christopher B. Coleman



Appendix A. Survey results for Code Enforcement Impact Assessment

Code Enforcement Racial Equity Impact Assessment Survey							
Survey s Receive d	What the notice you received easy to understand? Yes Or No	Was it clear who to contact if you had questions? Yes Or No	What can we do to make this city service better?	Do you identify yourself as a person of color? Yes Or No	Do You Believe these services are fair, regardless of your race? Yes Or No	If no, why not?	Zip code
1	Yes	Yes	Send Electronically to owners agent to get more timely notification.	No	Yes		55104
2	Yes	Yes	Give us more notice, sometimes the letter gets here a day before the abatement is due. Sometimes I get 3 letters sometimes 1, sometimes 0, then a bill shows up.	No	No		55117
3	Yes	Yes	Send notice to correct address . Picture of neighbor's trash now I need to clarify w/ inspector.	No	No	Trash pickup cost or disposal cost money. As a rule, neighbors "Of color" have less money, and more trash from neighbors who cant afford to pick it up or deliver it. Offer free pick up VS. abatement.	55104

4	Yes	Yes	Inspect all properties in the neighborhood area instead only the houses someone reports it.	Yes	No	Same as comment above and I was the only one targeted because of my race	55119
5	Yes	Yes	Pictures is a great idea.	Yes	No	Easy I have 2yr of city picking on a low income tenants of color cook at the address of tickets.	55106
6	Yes	Yes	Include info sheet on haul away options allow more time to remedy.	No	No	Who decides what's a problem and what's overlooked for months? Why the obituary deadline on a first notice?	
7	Yes	Yes	Hire employees who reflect the residents. Also give enough time notice to correct abetments.	Yes	No	Sometimes there is a negligence in areas population of people of color. More alternatives are needed.	55107
8	Yes	Include inspectors email address.			Yes		55104
9	Yes	Yes		No	Yes		55104
10	Yes	Yes		No	Yes		55117
11	Yes	Yes		Yes	Yes		
12	Yes	Yes		No	Yes		55117
13	Yes	Yes		Yes	YES		55117
14	Yes	Yes		Yes	Yes		55117
15	Yes	Yes		No	Yes		55117

16	Yes	Yes	Stop wasting tax m payer money.	Yes	No	I want to come to your house and see what's in your yard!	55104
17	Yes	No	Stop wasting tax m payer money.	Yes	No	I want to come to your house and see what's in your yard!	55106

