



Racial Equity Assessment Toolkit

Complete this assessment worksheet to analyze and plan for major policy, program, budget or practice changes to be in alignment with the department’s racial equity goals and desired outcomes. This analysis should be completed by people with different racial perspectives.

Project/initiative Name: Fire Certificate of Occupancy (C of O) Program Racial Equity Impact Assessment

Department: Safety and Inspections (DSI)

Contact: Mary Prescott, DSI Racial Equity Lead
Travis Bistodeau, Deputy Director
Angie Wiese, DSI Fire Manager

This is a:

Policy

Program

Initiative

Budget Issue

Step 1. Set Outcomes.

1a. For your department, what are the most important racial equity community outcomes related to the issue? (Response should be completed by department leadership in consultation with lead department staff(s) on policy/ program/budget or practice)

Fire Safety Inspection’s mission is “to protect lives and property thru proactive inspections and timely response to requests for service by well qualified, dedicated fire and life safety professionals”. The goal is to create safe places for building occupants, responders and property owner’s protection and ensure safe and habitable housing. The division moto is “Educate before Regulate”

This assessment was conducted to analyze Fire C of O inspection services using the City’s Racial Impact Assessment to identify potential for race-based disparities and develop solutions to address those disparities. Outcomes include:

- Ensure that inspections are occurring in all areas of the city and there are no gaps in communities of color.
- Ensure safe and habitable housing for all building occupants.
- Improve communication and involvement with communities in Fire C of O services.
- Increase educational opportunities to communities of color.
- Decrease the number of fires in communities of color.
- 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 2014 data available (all for residential and half for commercial) and developed on the current services provided. Data includes 1) complaints received, 2)

certificate inspections including initials, 3) renewals, 4) re-inspections, 5) provisions registered, 6) certified, 7) condemnation, 8) revocations, 9) classifications of A, B, C, and Ds and 10) days to complete inspections.

2. Map the data against the current demographics of the City of St. Paul including comparing it to current census data.
3. Identify any potential gaps in services and internally discuss possible solutions. Review resource allocation in certain areas of the City (percentages/raw numbers).
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. Propose service or ordinance changes.
6. 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"/> Workforce Equity |
| <input type="checkbox"/> Public Works | <input type="checkbox"/> Fire |
| <input type="checkbox"/> Environment/Sustainability | <input type="checkbox"/> Safety and Inspections |
| <input type="checkbox"/> Public Safety | <input type="checkbox"/> Education /youth work |
| <input type="checkbox"/> Jobs | <input type="checkbox"/> Parks and Recreation |
| <input type="checkbox"/> Housing | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Transportation | _____ |
| <input type="checkbox"/> Contracting Equity | |

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

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.

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? (See *Engaging Stakeholders on page 6.*) * In order for this guide to be most effective, conduct your stakeholder engagement process before proceeding.*

Interviewed three (3) perspective community facilitators and hired: DeYoung Consulting Services, LLC (City Cert List)

- 1) 2 Targeted Community Meetings- 4/12/2016 at Arlington Hills Community Ctr. And 5/24/2016 at Rondo Community Ctr.
- 2) Open Saint Paul- Decided it would be difficult to utilize with mapped data.
- 3) City and District Council Members and their constituents - Invited to community forums.
- 4) Stakeholder/business groups- Invited to community forums.

See attached power point utilized in community meetings with approach of presenting the data (included in power point), small group discussions and small group report outs. Questions asked included:

For Inspections

1. How do overdue inspections effect you or your community?
 - Can you find/rent safe healthy housing?
 - Have you had maintenance issues with your rental property?
2. What are ways to minimize any negative impacts from overdue inspections or what opportunities exist for increased racial equity?

For Complaints

1. How does the system for rental complaints affect you or your community?
 - Is the current complaint system effective?
 - Have you ever submitted a complaint?
 - Have your complaints been resolved?
2. What are ways to minimize any negative impacts (harm to communities of color, increase racial disparities, etc.) from the current complaint response system or what opportunities exist for increased racial equity?

For Grading (A, B, C or D)

1. How does this 'grading' program effect you or your community?
 - How is the quality of rental properties changing in your community?
 - Do rental property grades make a difference on where you rent?
2. What are ways to minimize any negative impacts (harm to communities of color, increase racial disparities, etc.) from this grading program or what opportunities exist for increased racial equity? How and Why?

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.

The attached City of Saint Paul: Department of Safety and Inspections - Fire Safety Inspection Program - Racial Impact Assessment: Community Impact Report by DeYoung Consulting Services, LLC states the following:

<p>Community members want more education.</p>	<p>Landlords requested additional education about the grading process, a list of common violations, and more educational materials in various languages.</p>
<p>Inspections are perceived to be done inconsistently.</p>	<p>Some community members speculated that they or their neighbors had been treated unfairly by inspectors because of their race, while others wondered whether it was an issue of inspector courtesy. And when they were told that inspectors receive racial equity training, community members questioned how implementation of those new learnings is being evaluated. Additionally, community members noted that inspections can be subjective; inspectors can be influenced by their own perceptions.</p>
<p>Inspections must be addressed using an equity model rather than an equality one.</p>	<p>One community member noted that an equal approach, such as tracking buildings, not owners, does not allow neighborhoods, and the people who live in them, to be looked at based on need. Additionally, some community members wondered whether more wealthy neighborhoods are treated more favorably in inspections than less affluent ones.</p>
<p>Engage the community in the inspection and grading process.</p>	<p>Community members perceived that racial equity can be addressed through the use of community consultants (paid) who can provide informed perspectives from the diverse communities that make up the City. Citizens can also serve as part of an appeal process that gives property owners the option to appeal inspectors' conclusions. And tenants could be given an opportunity to provide ongoing input, such as evaluation of landlords.</p>

Step 3. Benefits or Burdens
 Given what you have learned from data and from stakeholder involvement...

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

- 1) Need to improve consistency of inspections.
- 2) Need to provide improved customer education
- 3) Need for inspections to be addressed using an equity model rather than an equality one
- 4) Need to engage the community in the inspection and grading process

Step 4: Short- and Long-Term Strategies to Eliminate Inequities
 Develop strategies to create greater racial equity or minimize unintended consequences.

The following twenty strategies have been implemented by DSI:

Improve Consistency of Inspections

- Ensure all new Fire Safety staff receive 210 (increase from 196) hours of classroom training as well as field inspection experience prior to completing independent inspections
- Initiated a supervisor/inspector ride-along requirement as part of inspector's annual performance review process
- Began quarterly training with Construction Services staff (building, mechanical, electrical and plumbing inspectors) to ensure inspectors are evaluating building systems consistently
- Re-instituted "Payday Training E-mails" to provide bi-weekly, staff generated training materials regarding challenging situations actually observed during the inspection process
- Contracted with an online provider of training materials to ensure staff are following training materials consistently

Provide Improved Customer Education

- Require all new Fire Certificate of Occupancy property owners attend the 8 hour Landlord 101 training program
- Provide "cheat sheet" to property owners on how to receive highest score possible, which may result in fewer inspections and fees, prior to conducting the inspection
- Updated Fire Safety website to provide "cheat sheet" information to all owners prior to an inspection
- Developed an interactive residential Fire Certificate of Occupancy property map on DSI website to allow tenants and landlords to see the letter grade properties received during their last inspection
- All Fire Certificate of Occupancy inspection reports will be available online through the DSI website (anticipated 1st quarter of 2017)
- Developed many fire safety Public Service Announcements in Multiple Languages

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

- Implemented a DSI wide staff training module with a focus on improving the understanding around equity include the city sponsored Beyond Diversity and Foundations of Racial Equity training, and participation in the RACE exhibit at Science Museum of Minnesota
- In 2015, DSI expanded the letter grade property scoring matrix to further incentivize property owners to maintain their properties to the highest standards possible, to the benefit of owners and occupants
- Continue to evaluate all documents from a plain language perspective, i.e. appointment letter.
- Partner with the Department of Planning and Economic Develop to create funding sources to help owners better maintain their properties
- Developed Landlord 101 training program at no cost to new rental property owners
- Updated Fire Safety website "Resources" page to provide property owners and tenants more information regarding services available within the Saint Paul area.

- In an effort to increase transparency, developed an interactive residential Fire Certificate of Occupancy property map on DSI website to allow tenants and landlords to see the letter grade score a property received during their last inspection

Engage the community in the inspection and grading process

- All Fire Certificate of Occupancy inspection reports will be available online through the DSI website (anticipated 1st quarter of 2017). Staff will leave a note in the unit of each dwelling inspected so occupants are aware of the inspection results.
- DSI is dedicated to revitalizing relationships with community advocacy groups by regularly attending community meetings to further enhance the services we provide and better understand the impact our services have on owners/occupants within the city.

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?

All of the recommendations have been implemented. Most of them were able to be completed in less than 6 months. Others took more time to coordinate and were completed within 18 months

As a result of completing this impact assessment, DSI is now regularly communicating with several tenant advocacy and related stakeholder groups. These relationships continue to improve and refine the residential Fire Certificate of Occupancy program to the benefit of the program itself and residents in Saint Paul. However, this exercise also demonstrates the need to continue to support and grow these relationships. The Fire Safety division needs to continue to reach out to the community to help plot the trajectory of related programs. The Fire Safety division anticipates continuing with this effort as part of a larger DSI community engagement project scheduled to begin in 2018.

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 were shared at the DSI all staff meeting in January of 2017. Issues and struggles, best practices and research are being shared with the Citywide Change Team on December 18, 2017 in hopes that more departments can analyze their services and learn from DSI's experiences.

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

Consultant's report was shared with all community members who were in attendance at the stakeholder's meetings. Unfortunately, the attendance at these sessions was low. We suggest partnering with other departments and city forums to reach our community members. Now that all the strategies are implemented, we plan on getting those individuals and groups back together in early spring to share our progress and keep the engagement ongoing.

ADDITIONAL RESOURCES

ENGAGING STAKEHOLDERS

(adapted from City of Seattle's Racial Equity Toolkit)

Identify Stakeholders –

Find out who are the stakeholders most affected by, concerned with, or have experience relating to the policy, program or initiative? Identify racial demographics of neighborhood or those impacted by issue.

Once you have identified your stakeholders

- *Involve them in the issue* - Describe how historically underrepresented community stakeholders can take a leadership role in this policy, program, initiative or budget issue.
- *Listen to the community and ask:*
 1. What do we need to know about this issue? How will the policy, program, initiative or budget issue burden or benefit the community? (concerns, facts, potential impacts)
 2. What factors produce or perpetuate racial inequity related to this issue?
 3. What are ways to minimize any negative impacts (harm to communities of color, increased racial disparities, etc.) that may result? What opportunities exist for increasing racial equity?

Tip: Ways to gather community input...

- Community meetings in neighborhoods that will be impacted
- Focus groups
- Consulting with City commissions and advisory boards
- Solicit for input using online tools such as surveys and Open Saint Paul
- Partner with nonprofits that may work with neighborhood residents
- Cultural leadership organizations or associations

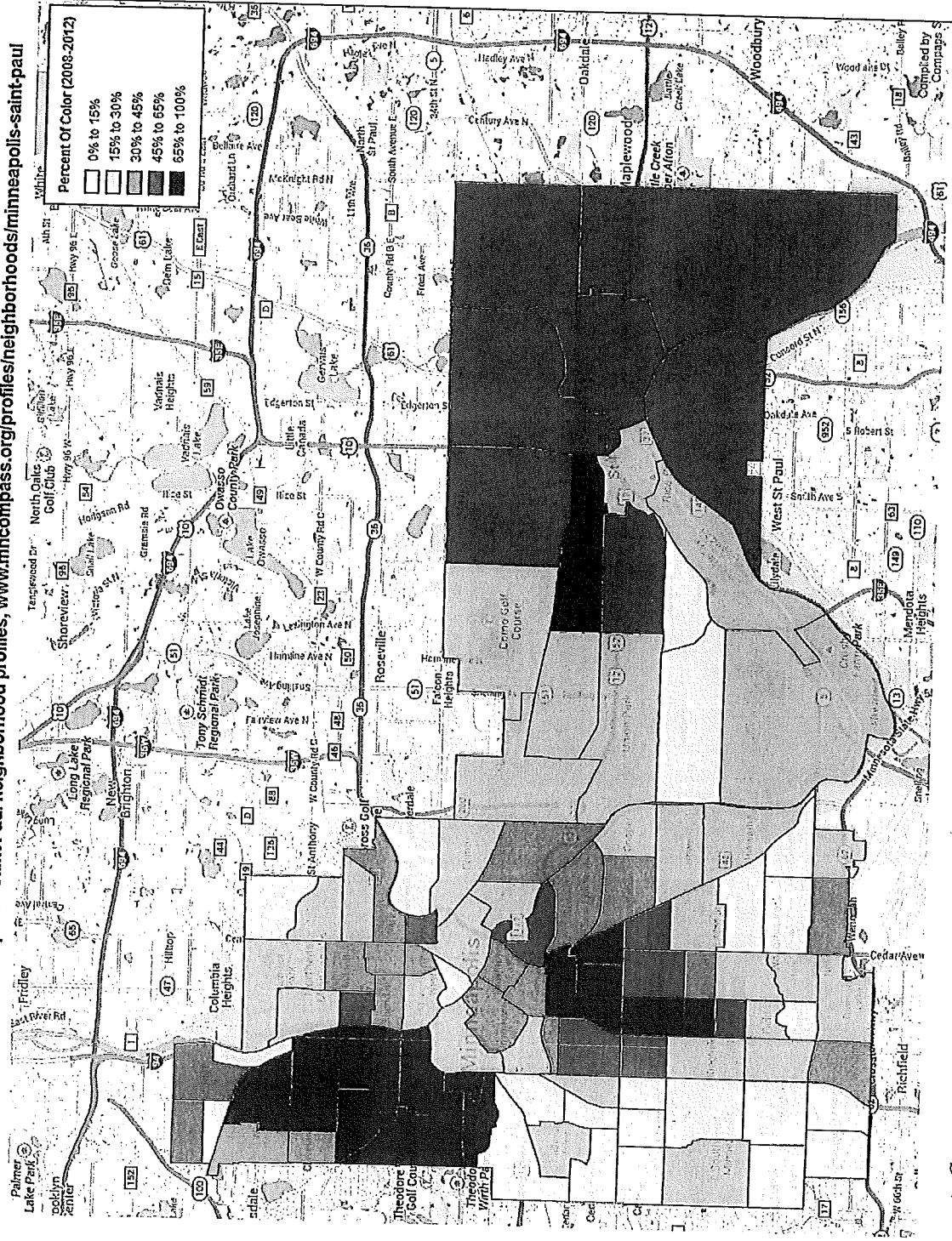
Examples of what engaging stakeholders look like in practice:

- A reduction of hours at a community center includes conversations with a broad array of users of the community center as well as staff who work there.
- Before implementing a new penalty fee, people from the demographic most represented (or over-represented) among those fined are surveyed to learn the best ways to minimize negative impacts.

Neighborhood Demographic Table

Neighborhood	Planning District (St. Paul geographies only)	Total Population	Total Population n - 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 Como	1	20,453	7.2%	88.8%	47.8%	20.3%	0.6%	16.6%	0.2%	3.2%	11.2%
Dayton's Bluff	10	11,913	4.2%	96.1%	82.6%	5.4%	0.4%	4.8%	0.2%	2.6%	3.9%
Capitol River/Downtown	4	16,434	5.8%	85.0%	39.5%	16.2%	1.3%	23.8%	0.1%	4.1%	15.0%
Greater East Side	17	7,057	2.5%	95.3%	70.6%	16.0%	0.9%	4.9%	0.2%	2.8%	4.7%
Hamline-Midway	2	27,206	9.5%	86.8%	42.6%	14.3%	1.0%	24.9%	0.2%	3.8%	13.2%
Highland	11	11,496	4.0%	93.8%	68.8%	15.0%	0.9%	5.3%	0.2%	3.6%	6.2%
Macalester-Groveland	15	24,078	8.4%	95.2%	78.9%	10.0%	0.3%	3.7%	0.3%	2.0%	4.8%
Union Park	14	19,546	6.9%	97.2%	89.6%	1.9%	0.3%	2.9%	0.1%	2.3%	2.8%
North End/South Como	13	18,405	6.5%	95.6%	77.8%	11.1%	0.5%	3.2%	0.1%	2.9%	4.4%
Payne-Phalen	6	25,447	8.9%	89.8%	38.5%	21.5%	1.2%	24.5%	0.1%	4.0%	10.2%
St. Anthony Park	5	30,700	10.8%	86.3%	35.0%	15.9%	1.2%	30.6%	0.1%	3.7%	13.7%
Summit Hill	12	7,674	2.7%	96.8%	74.0%	8.6%	0.6%	11.0%	0.2%	2.4%	3.2%
Summit-University	16	6,574	2.3%	96.7%	89.0%	2.9%	0.2%	2.4%	0.1%	2.1%	3.3%
Frogtown/Thomas-Dale	8	17,002	6.0%	95.4%	46.1%	35.0%	0.7%	9.8%	0.2%	3.5%	4.6%
West 7th/Fort Road	7	15,041	5.3%	90.4%	21.1%	29.8%	1.1%	34.1%	0.3%	3.9%	9.6%
West Side	9	11,083	3.9%	92.1%	73.6%	10.8%	1.0%	3.3%	0.1%	3.4%	7.9%
City of St. Paul	3	14,959	5.2%	69.4%	45.3%	11.8%	1.1%	7.9%	0.2%	3.3%	30.6%
	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);

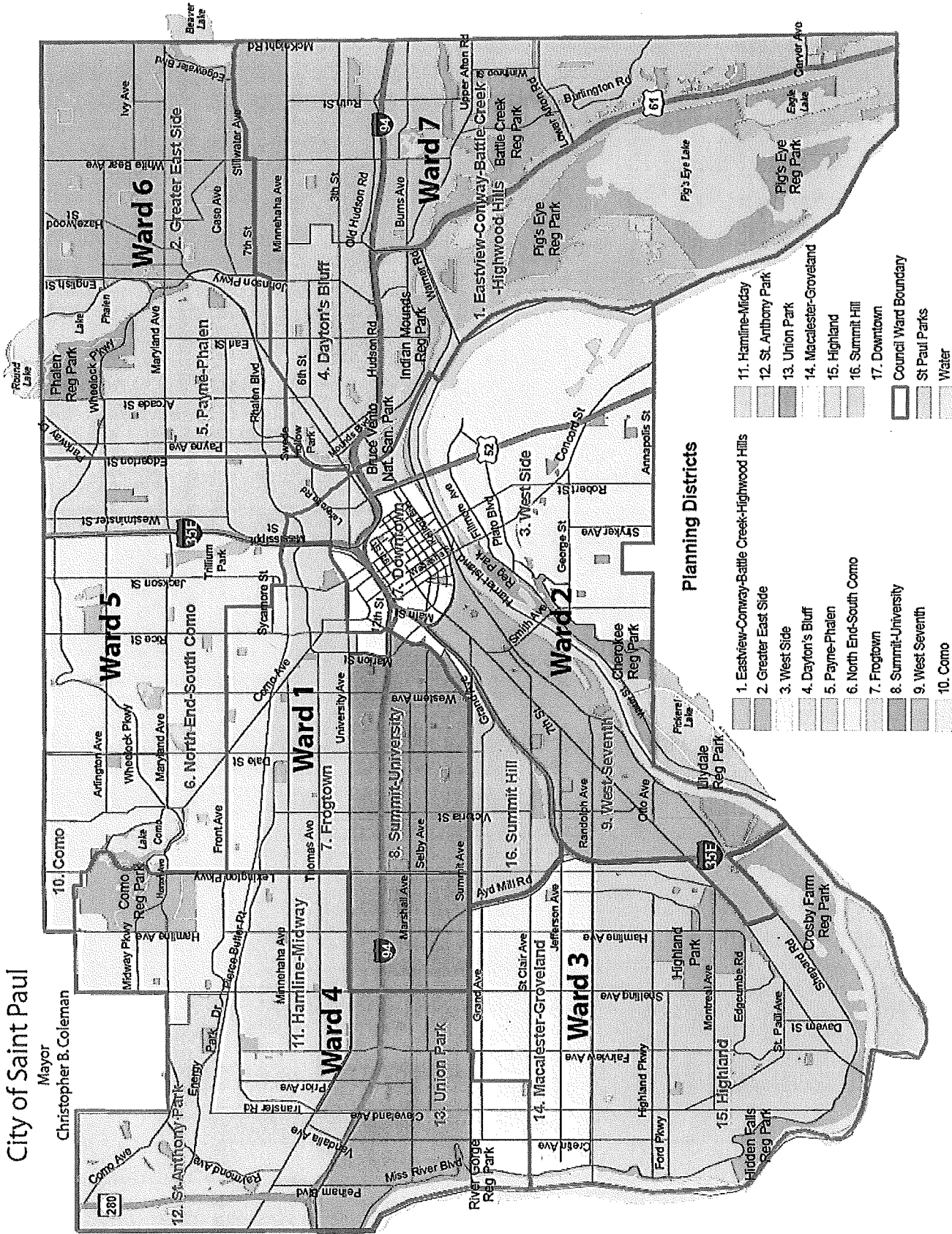


Data source: Minnesota Compass - The data come from the U.S. Census Bureau, 2010 decennial census (demographic data including total population, race and ethnicity, as well as housing units and types of households);

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



Planning Districts

- 11. Hamline-Midway
- 12. St. Anthony Park
- 13. Union Park
- 14. Macalester-Groveland
- 15. Highland
- 16. Summit Hill
- 17. Downtown
- 11. Eastview-Conway-Battle Creek-Highwood Hills
- 2. Greater East Side
- 3. West Side
- 4. Dayton's Bluff
- 5. Payne-Phalen
- 6. North End-South Como
- 7. Frogtown
- 8. Summit-University
- 9. West Seventh
- 10. Como