



SAINT PAUL
HUMAN RIGHTS & EQUAL
ECONOMIC OPPORTUNITY

[STPAUL.GOV/HREEO](https://stpaul.gov/hreeo)



2024 Annual Report

Human Rights & Equal Economic Opportunity (HREEO)

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MISSION

The mission of the Department of Human Rights & Equal Economic Opportunity (HREEO or Department) is to serve Saint Paul residents and businesses by advancing justice and equity through education, advocacy, and enforcement.

HREEO COMMISSIONS & COMMITTEES

The Department, Mayor, and City Council rely on the thoughtful advice of over 30 community boards, commissions, and committees throughout the city. These groups cover a wide range of topics and appeal to a variety of interests. HREEO coordinates the following boards and commissions:

- [Advisory Committee on Aging](#) (ACOA)
- [HREEO Commission](#) (HREEOC)
- [Labor Standards Advisory Committee](#) (LSAC)
- [Mayor's Advisory Committee on People with Disabilities](#) (MACPD)
- [Police Civilian Internal Affairs Review Commission](#) (PCIARC)

Applications to city boards, commissions, and committees are accepted on a rolling basis. To find out more about HREEO's commissions and committees, or to apply online, visit [Boards and Commissions, Openings and Application](#).

PROCUREMENT DIVISION HIGHLIGHTS

The Procurement Division plays a central role in ensuring the City of Saint Paul obtains the goods, services, and construction it needs to serve residents efficiently, transparently, and in alignment with community values.

Key Procurement Activity in 2024

2024 Procurement Metrics	Total
New Contracts Executed	502
Solicitation Events	104

These contracts supported a wide range of city functions, including public safety, infrastructure, technology, language access, and more.

Solicitation Methods Used

The City uses different types of solicitations depending on the nature and value of the work:

- Request for Proposals (RFPs) – 53 events**
Used for **services** over \$175,000 where qualifications and approach matter as much as price. Examples include translation services, technology consulting, and architectural design.
- Request for Bids (RFBs) – 44 events**
Used for **construction, goods, and materials**, where **lowest price** wins under **state law** (Minnesota Statute § 471.345). Examples include street reconstruction, playground equipment, and vehicle purchases.
- Request for Quotes (RFQs) – 7 events**
Used for **projects under \$175,000**, offering a faster process while maintaining competitive pricing.

Faster Project Start Times

The Procurement Division significantly reduced the average time between the close of a solicitation and the start of a project:

Solicitation Type	2023 Avg (Days)	2024 Avg (Days)	Improvement
RFP	136	74	↓ 45%
RFB	16	15	↓ 6%
Overall Average	76	44.5	↓ 41%

This means that once bidding closes, contracts are starting faster—getting work on the ground sooner.

Advancing Local Impact: Common Cent Projects

In 2024, the City launched its first projects under the Common Cent sales tax initiative, investing in streets and parks across Saint Paul. The Procurement Division ensured that public dollars stayed local by providing a scoring incentive for City of Saint Paul-based vendors on Common Cent-funded RFPs which helps support local businesses and grow community wealth as we build for the future.

CONTRACT COMPLIANCE & BUSINESS DEVELOPMENT

The Contract Compliance and Business Development Division ensures that the community can participate in the economic opportunities created by the City of Saint Paul. Contract Compliance is responsible for several compliance and business development programs:

- Affirmative Action and Equal Employment Opportunity
- Prevailing Wage
- Vendor Outreach Program
- HUD Section 3

Affirmative Action & Equal Employment Opportunity (AA/EEO)

All vendors with \$50,000 or more in city contracts must register their Affirmative Action Program (AAP) with the city prior to contract signing. An AAP must include hiring goals for the employment of women, minorities, and people with disabilities. In 2024,

- Over 325 vendor Affirmative Action Plans were reviewed and certified.
- The team reviewed and approved 179 contracts requiring compliance with affirmative action.

Construction contracts receiving city funding must comply with workforce inclusion goals for minorities and women set by the Minnesota Department of Human Rights. Here are the 2024 totals for all construction contracts receiving city funding:

2024 Construction Workforce Inclusion			
Minority Inclusion Hours		Women Inclusion Hours	
304,463.73		55,120.77	
Goal 32%	Achieved 23.88%	Goal 20%	Achieved 4.32%



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Prevailing Wage

Contract Compliance educates, monitors, and enforces federal, state, and local prevailing wage laws on applicable City of Saint Paul construction projects. In 2024:

- Contract Compliance monitored labor compliance requirements on over 250 construction projects totaling more than \$1.2B in total development costs.
- More than 6,000 workers were reported on prevailing wage compliance payrolls totaling more than 1,000,000 construction hours.
- Contract Compliance Coordinators also recovered over \$6,000 in restitution owed to underpaid individuals working on City of Saint Paul funded construction projects.

Vendor Outreach Program (VOP)

The VOP is the small business inclusion program for CERT-certified, small, woman-owned, and minority-owned business enterprises (S/W/MBEs).

2024 Local Small Business (VOP) Inclusion	Dollars	Percentage
Overall Small Business (S/W/MBE) Subcontracting	\$72,381,641	27.9%

HUD Section 3

The Housing and Urban Development (HUD) Section 3 program requires that opportunities generated by HUD financial assistance be directed to low-income families and individuals, particularly those who are recipients of public housing and other government assistance. Section 3 also benefits businesses that employ and train local low-income workers. The City of Saint Paul has a strong history of working with local low-income workers and businesses, community partners, and other local government agencies to ensure Section 3 continues to benefit local and low-income businesses and workers.

This year the City of Saint Paul has two projects with over \$200,000 in HUD funding. These projects combine for a total of \$4,100,000 in HOME funds expended. There are no projects with CDBG funds for the year. The total development cost or business opportunity of these projects are \$42,030,145.

Subcon- tracts > \$200,000 of HUD Fund- ing	HUD Fund- ing	Total De- velopment Cost or Total Op- portunity	Total Labor Hours	Section 3 Worker Hours	Section 3 Targeted Worker Hours	Totals Combined Section 3 and Target- ed Section 3 Labor Hours
Marshall Ave Flat	\$2,600,000 Home	\$22,035,365	7,662	1,311.5	0	1,311.5
Phalen Vil- lage	\$1,500,000 Home	\$19,994,780	44,956.59	11,490.1	6,976	18,466.1
TOTALS	\$4,100,000	\$42,030,145	52,618.59	12,801.59	6,976	19,777.6

We are proud to report that we have achieved a combined 37.5% of all workforce hours performed by Section 3 Workers and Targeted workers. We exceeded the 20% Section 3 Worker goal at 24.3% of all labor hours being with Section 3 Workers. We also exceeded the 5% Section 3 Targeted Worker Goal, in which we achieved 13.2%. Between the two active projects on this report, there are a combined 145 contractors/subcontractors/businesses, with 16 Section 3 certified businesses performing work which enables their workforce and labor hours to count towards each project. Both projects are nearing completion in the next couple of months, so we don't anticipate the numbers to deviate very much from the numbers reported here.

2024	Total Labor Hours	Section 3 Worker Hours	Section 3 Targeted Worker Hours
GOAL	25%	20%	5%
ACHIEVED	37.5%	24.3%	13.2%

In 2024, we certified the following businesses and workers:

- 49 – Business Certifications
- 142 – Worker Certifications
- 23 – Targeted Worker Certifications

This year, the City of St. Paul has partnered up and engaged in 9 local and regional events/workshops sharing Section 3 contracting opportunities, Section 3 certifications, career/occupational training opportunities, project fairs/open houses, and other technical assistance with potential and current Section 3 Businesses, Workers, and Targeted Workers. In addition, the City of St. Paul has partnered with the MN Trades Academy/Construction Careers Foundation on 2 occasions to build capacity to train with local small, small minority-owned, small woman-owned, and Section 3 businesses, as well as train local job seekers (Section 3 Workers and Targeted Workers).

For more information, visit Contract Compliance. Individuals can also call 651-266- 8966 or email contractcompliance@ci.stpaul.mn.us. Individuals can also call 651-266- 8966 or email contractcompliance@ci.stpaul.mn.us.

LABOR STANDARDS EDUCATION & ENFORCEMENT

The Labor Standards Enforcement and Education Division is responsible for the education, outreach, and enforcement of the City's Earned Sick and Safe Time (ESST), Minimum Wage Ordinances and, as of January 1, 2025, the City's Wage Theft Ordinance. These ordinances apply to employees working within the geographic boundaries of the City, regardless of where the employer is located.

In addition to enforcing some of the City's labor laws, the Labor Standards team provides free training to employers and educates the community about ordinances through outreach. In 2024, the Labor Standards Division conducted six (6) trainings, tabled at 17 events, and partnered with the Federal and State Department of Labor to visit Saint Paul businesses during Workplace Rights Week. To stay informed of emerging trends and foster relationships, investigators participated in 30 virtual assemblies with other local, state, and national labor agencies. Additionally, in preparation of the passing and implementation of the Wage Theft Ordinance and Administrative Citations, the investigators routinely attended City Council and Charter Commission meetings to provide support and information.

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The Labor Standards Division regularly updates Administrative Rules and supporting materials that are used as resources for employees and employers. For example, the Employee Notice Poster is a tool to educate and inform employees and employers of the City’s labor standards ordinances and is available in five (5) languages. Please visit the [Labor Standards Enforcement and Education Division](#) to view the poster and access other resources.

2024 Labor Standards Case Data	Total
Inquiries Received from Employers and Employees	154
Official Complaints Received	38
Closed Investigated Cases	35
Employees Impacted in Closed Cases	154
Financial Remedies Ordered	\$10,968
ESST Hours Recovered	673

Earned Sick & Safe Time (ESST)

In 2016, the City of Saint Paul passed the first ESST Ordinance in the state, recognizing the benefit to employers and employees of paid sick time. To this day, HREEO continues to work with employers and employees to foster understanding of employees’ rights to care for themselves and their family’s health and well-being and of the benefits of increasing employee retention. The City’s ordinance became the model for the State to pass Earned Sick and Safe Time in 2023, which took effect January 1, 2024. As a result of the state statute, Saint Paul has to regularly make amendments to its local ordinance, working with the Mayor and City Council to amend the ESST ordinance to align with the State law. Some of the recent changes needed were:

- Expanding the definition of “family member” to allow an employee to choose to designate one (1) additional individual as family annually.
- Allowing employees to use ESST immediately upon accrual without waiting until the first 90 days of employment has passed.
- Allowing reinstatement of previously earned and unused ESST for employees rehired by the same employer within 180 days of separation.
- Allowing employees to provide their own signed statement as valid documentation for ESST use.

For more information about the ESST Ordinance updates, visit [Earned Sick and Safe Time](#) and the [City of Saint Paul Earned Sick and Safe Time Ordinance](#).

Minimum Wage

When the City of Saint Paul passed its Minimum Wage Ordinance in 2018, the minimum wage rates differed based on business size to give employers time to adjust their business model to adapt to the minimum wage increases. The Ordinance originally separated Employers into four (4) different business size classifications: Macro, Large, Small, and Micro. From the beginning, the City of Saint Paul as an employer was committed to paying the highest minimum wage rate.

To determine business size, employers must count all employees: full-time, part-time, and temporary; hired jointly with another employer; employees working remotely or at another location outside of the City. The Saint Paul Minimum Wage rate increases annually for all businesses on January 1st or July 1st, depending on their business size.

By the end of 2024, we saw the gaps between some business sizes close. In particular, the minimum wage rates for Macro and Large employers have now become the same and will continue to increase at the same rate moving forward. These changes reduce the need to maintain separate classifications for some business sizes.

Minimum Wage Increase Update Effective January 01, 2025, the Minimum Wage rate for businesses in the City of Saint Paul will increase according to the below schedule. Learn more at stpaul.gov/minimumwage. 			
	EFFECTIVE JAN. 1, 2025	EFFECTIVE JULY 1, 2025	EFFECTIVE JAN. 1, 2026
CITY RATE Includes Macro & Large (101+ employees)	\$15.97	\$15.97	TBD, Announced 09/01/25
SMALL (6-100 employees)	\$14.00	\$15.00	\$15.00
MICRO (5 or fewer employees)	\$12.25	\$13.25	\$13.25

For more information, visit [Minimum Wage](#) and the [City of Saint Paul Minimum Wage Ordinance](#).

Wage Theft

The Labor Standards Advisory Committee (LSAC) introduced the possibility of a civil wage theft ordinance in the City of Saint Paul. With the firm belief that all employees should be paid the wages they earn and with the knowledge that businesses that engage in wage theft undercut good business practices, the LSAC, in partnership with the Labor Standards Division, brought the Wage Theft Ordinance to the Mayor and City Council. The City's Wage Theft ordinance passed on November 6, 2024, and took effect on January 1, 2025.

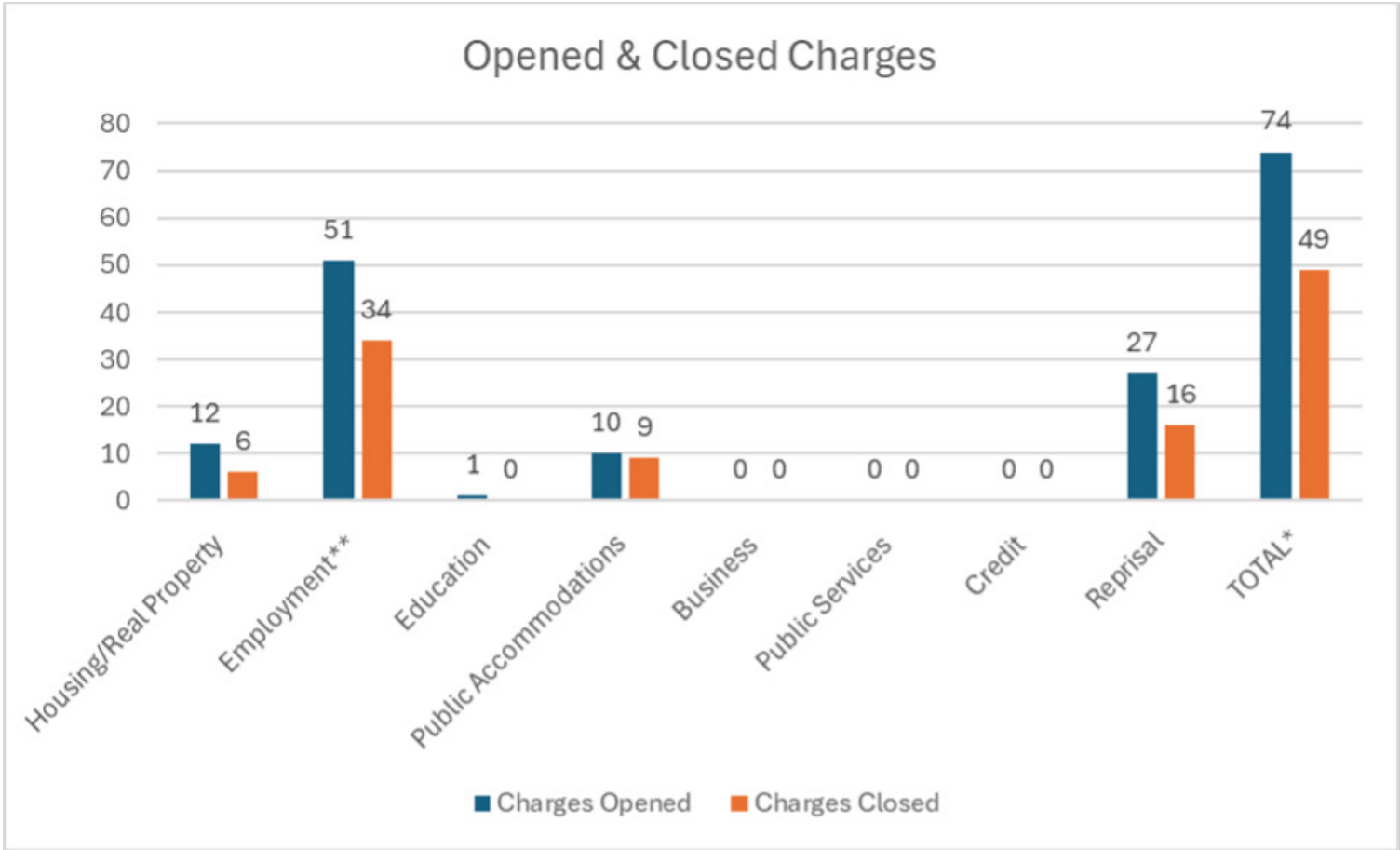
The Ordinance applies to all employees, full-time, part-time, and temporary, who work at least 2 hours during a week within the geographic boundaries of Saint Paul. Wage theft occurs any time employers fail to pay wages employees are legally entitled to, including paying below minimum wage, not paying overtime, requiring work without pay, denying legal breaks, misclassification, withholding tips, non-payment of fringe benefits, and illegal deductions. The Ordinance does not cover independent contractors. For more information, visit [Wage Theft](#) and the City of Saint Paul [Wage Theft Ordinance](#).

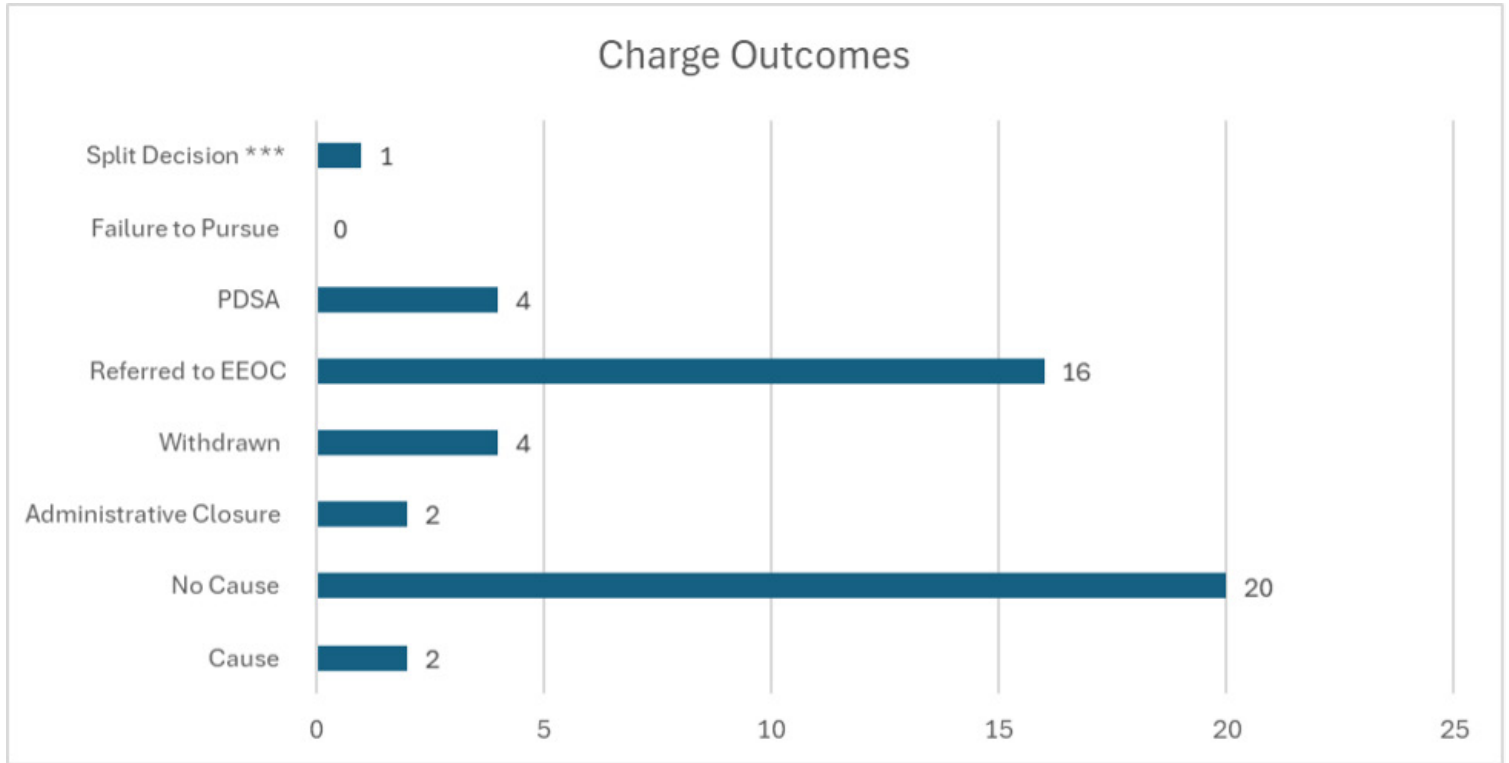
HUMAN RIGHTS INVESTIGATIONS

The Human Rights Investigation Division enforces the City of Saint Paul [Human Rights Ordinance, Chapter 183](#). The Human Rights Ordinance prohibits discrimination and harassment based on [13 protected classes](#): race, color, national origin, disability, sex, gender identity/expression, sexual and affectional orientation, religion, creed, age, marital status, familial status, ancestry, and status with regard to public assistance in the areas of Employment, Real Property (Housing), Education, Public Accommodations, Public Services, Reprisal, Business, and Credit in Saint Paul. The division investigates alleged acts of discrimination, determines findings of “cause” or “no cause” of discrimination, and mediates settlement discussions before and after investigations conclude. There is no charge for this service.

The Human Rights Investigation Division has agreements with two (2) federal partners, the Housing and Urban Development (HUD) agency and the Equal Employment Opportunity Commission (EEOC) to investigate cases on behalf of those agencies. The agreements expand the enforcement capacity of each of the agencies and allow HREEO investigators to provide local services in Saint Paul. HREEO is the only agency in the entire state of Minnesota that is empowered to investigate HUD cases.

2024 Human Rights Cases by Area





The Human Rights Investigation division works to settle every case that is opened. The Department offers parties the opportunity to suspend an investigation and work toward a resolution in the matter. This process is referred to as pre-determination settlement conversations that will result in an enforceable agreement that all parties commit to. The Department also works to negotiate conciliation agreements when investigations reveal discrimination or “cause” in a case. Settlement agreements either before or after a determination is made often include some or all of the following things:

- Policy development and implementation
- Training
- Public notice
- Data collection
- Restitution
- Monetary payments. Some examples are:
 - Lost wages
 - Pain and suffering
 - Reimbursement for expenses



In 2024, the Human Rights Investigation division negotiated more than \$70,000 in direct payments to complainants.

The total reflects the overall number of individual charges opened and closed. Some charges involve 2 or more areas (i.e. Employment and Reprisal). * Final determination with findings of both cause and no cause.*

2024 Human Rights Cases by Protected Class

Age	Ancestry	Color	Creed	Disability	Familial Status	Marital Status
6	0	1	0	39	0	0

National Origin	Public Assistance	Race	Religion	Sex	Sexual or Affectional Orientation	Total
2	0	31	2	11	2	74*

*The total indicates the overall number of charges opened. Some charges involve multiple protected classes under the Ordinance.

For more information, visit [Human Rights](#). Individuals can also call 651-266-8966, or email hrightscomplaints@ci.stpaul.mn.us.

ACCESSIBILITY

The Accessibility Coordinator enforces Title II of the Americans with Disabilities Act (ADA) and Limited English Proficiency (LEP) services across the city. The Accessibility Coordinator works with city departments to make sure community members do not face barriers to accessing the programs and services the city provides.

Over the course of 2024 and early 2025, 12 departments submitted ADA transition plans with 6 more in process. These plans outlined where and how every department intersects with the public and identified opportunities and plans to improve disability access to their facilities, services, programs, and information. To review the ADA Transition plans, please visit stpaul.gov/adaplans.

Nine (9) different departments have consulted with the Mayor’s Advisory Committee for People with Disabilities (MACPD) in how their work could best serve the disabled community and how they can avoid barriers that may have restricted access in the past. We are piloting a Community Impact Assessment Tool (CIAT) with departments that seek to identify voices and viewpoints historically missing from the decision-making process and getting input

on how best to improve city structures, spaces, plans, and ordinances so all people can participate.

The City of Saint Paul takes pride in our diverse and multicultural communities and providing information and services in any language is essential to create a fully accessible city. In 2024, we recorded 33,568 LEP encounters between community members and city staff. While Spanish was the most frequently requested language, we also provided services in 19 other languages in the form of in-person and over-the-phone interpretation, written translation, and ASL services. With multilingual staff members, many departments were able to provide services in languages other than English on a daily basis and in real-time. We collected data from every department on the quantity and quality of LEP services and are compiling that information in our second annual city-wide LEP annual report. The LEP report also highlights areas where the city can expand, improve, and streamline language access services.

If you or someone you know encounters barriers to access city services, programs, facilities, or information, please visit [Accessibility Coordinator and Accommodation Requests](#), or contact the City of Saint Paul Accessibility Coordinator at 651-266-8902 or email adacoordinator@ci.stpaul.mn.us.

POLICE CIVILIAN INTERNAL AFFAIRS REVIEW COMMISSION (PCIARC)

Composed of Saint Paul residents, the PCIARC is the City's civilian oversight group or commission that reviews investigations into complaints from community members about misconduct by licensed officers of the Saint Paul Police Department (SPPD). The PCIARC recommends disciplinary actions and policy updates to the Saint Paul Chief of Police based on its review of investigations into complaints filed by community members. The PCIARC does not replace civil or criminal court, rather it makes recommendations to the Chief of Police regarding the conduct of police officers as employees, subject to the [Minnesota Peace Officer Discipline Procedures Act](#) (PODPA) and related state labor laws. The Chief of Police has the authority over any discipline assigned to police officers.

The following table shows cases reviewed by the Commission since the PCIARC moved to HREEO in 2017.

	2017	2018	2019	2020	2021	2022	2023	2024
Cases Reviewed by PCIARC	29	42	44	39	21	19	34	52
Total Sworn Officers	54	70	72	81	26	32	66	97
Total Allegations	63	77	88	90	26	37	88	124

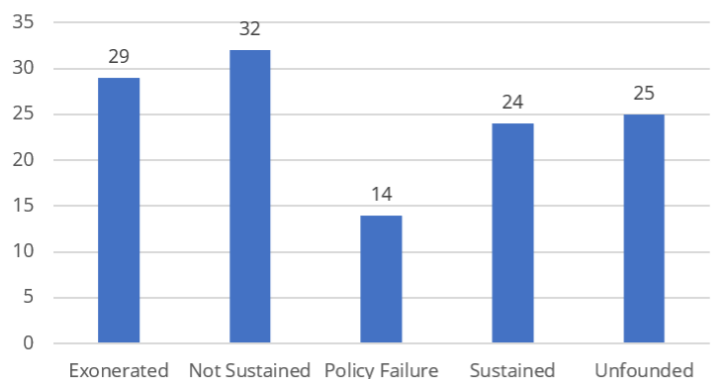
2024 PCIARC Case Review Data

Summary data reflects the 52 cases reviewed by the PCIARC in 2024, as well as disposition and disciplinary recommendations made to the Chief of Police. Please note: some of the complaints reviewed by the PCIARC in 2024 were filed in 2023.

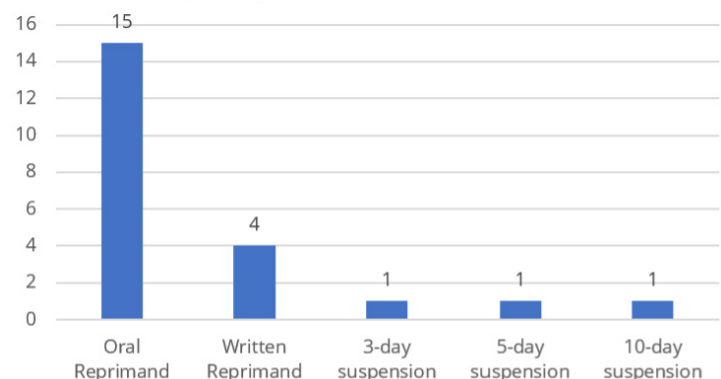
PCIARC Commissioners review all case materials, hold case deliberations, and recommend a determination or decision on investigations as to if an officer violated a policy. That determination is called a disposition. Commissioners may also recommend disciplinary action to the Chief of Police and make policy recommendations to SPPD.

To learn more about the PCIARC or file a complaint visit stpaul.gov/pciarc or contact the PCIARC Coordinator at 651-266-8970 or CivilianReview@stpaul.gov.

2024 Disposition Recommendations



Disciplinary Action Recommendations



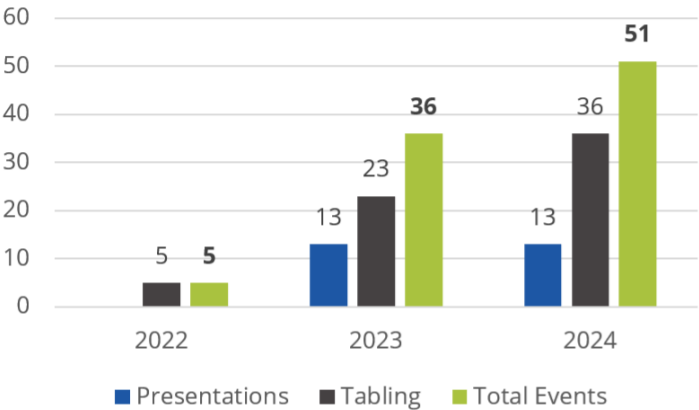
OUTREACH, ENGAGEMENT & COMMUNICATIONS

The Department’s commitment to communication, outreach, and engagement have increased a great deal in 2024. We have worked hard as a team to grow our participation in community events, our offering of Know Your Rights presentations, and our use of communication tools like the website, email blasts, and social media.

In May 2024, HREEO welcomed a new Public Information Specialist (“Specialist”) to lead and manage the department’s communications. Since joining, this role has been vital in centralizing and enhancing HREEO’s communications across many platforms and audiences.

One key area of responsibility has been responding to public data requests. Public data requests increased significantly from 2023 to 2024. The majority of data requests pertain to public procurement data.

HREEO Outreach and Engagement Events

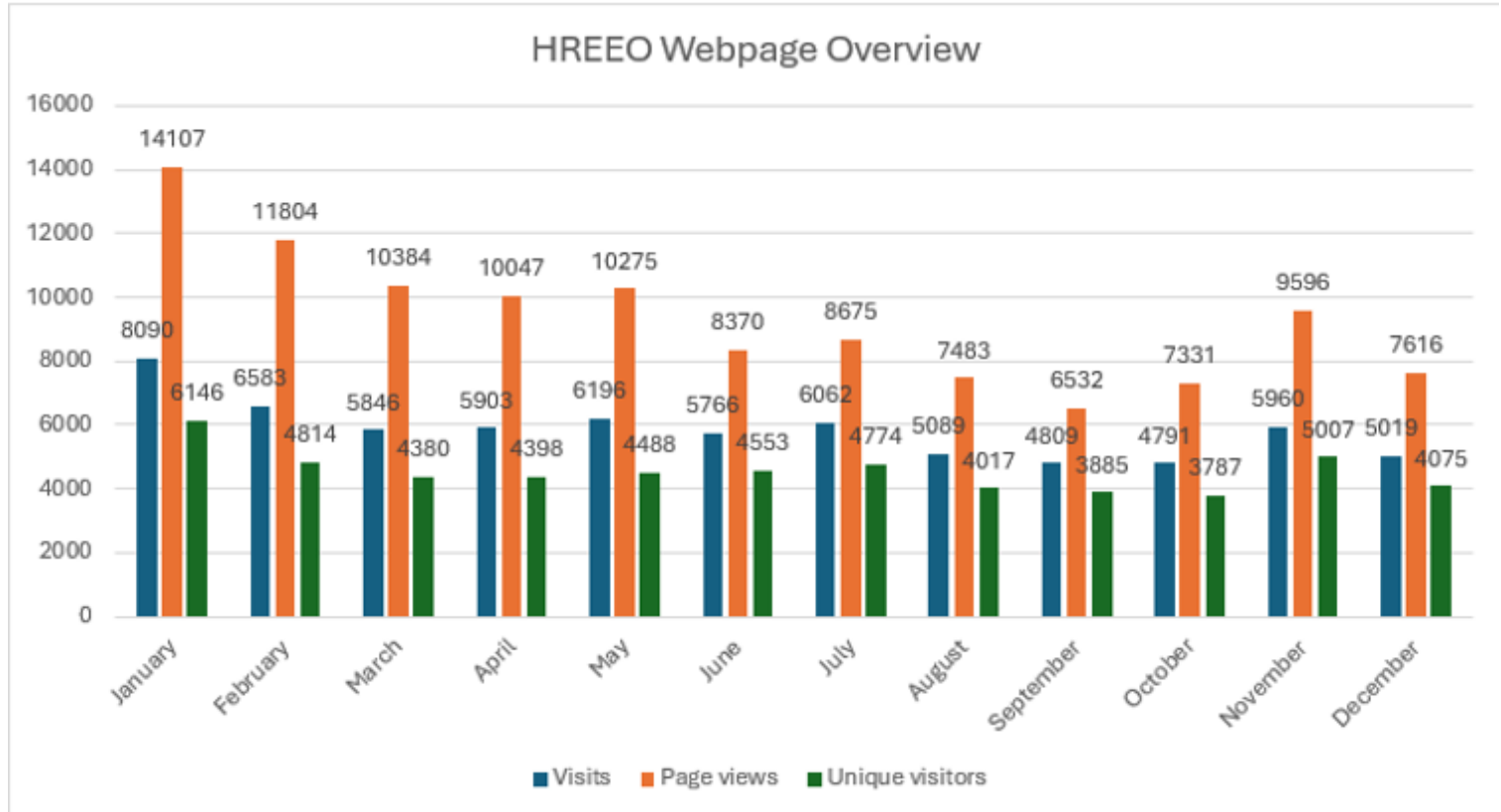


Year	Total Data Requests	Closed Requests	Pending Requests
2023	20	18	2
2024	81	76	5

Data was compiled from the City’s Open Information Portal and does not include requests submitted via email, in person, or by telephone.



Additionally, the Specialist has significantly improved HREEO's public-facing HREEO webpages through a comprehensive website optimization plan to improve the design and accessibility to HREEO's online public information. Here is a look at HREEO's online traffic presence:



Email communications have also grown with increased email blasts and newsletters sent. These communications reached a total of 223,130 constituents, with each email averaging a reach of 3,486 constituents and an average delivery rate of 96%.

Year	Total Emails	Total Constituents Reached	Email Average Reach	Average Delivery Rate
2023	08	25,678	3,210	92%
2024	65	223,130	3,486	96%

The data was compiled from GovDelivery and does not include internal email communications or emails sent directly by City employees to constituents.

On social media, HREEO grew its presence on the City's Facebook, X (formerly Twitter), Instagram, and LinkedIn accounts in 2024. Print materials are currently being evaluated and improved to ensure all department posters, flyers, brochures, and other materials are accessible. This includes translating materials into the four additional primary languages used by the community: Spanish, Hmong, Karen, and Somali.

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IN CLOSING

Whether you live, work, or play in Saint Paul, our ordinances hold protections for you. Share your upcoming event and connect with us to arrange a Know Your Rights presentation in person or virtually. Staff will inform you about the Saint Paul ordinances that HREEO enforces and will answer your questions about the City's:

- Human Rights ordinance that makes discrimination illegal in Saint Paul
- Wage Theft, Minimum Wage, and Earned Sick & Safe Time (ESST) ordinances
- Civilian review of police misconduct
- Resources for greater language access and better access under the Americans with Disabilities Act (ADA)
- CERT program that certifies small and local businesses
- And much more!

Looking ahead to 2025 and beyond, HREEO is committed to deepening community engagement through increased event participation, expanded outreach, and greater social media and press presence. Reach out to us at Contact-HREEO@stpaul.gov or 651-266-8966. We look forward to working with you!

Attention

If you want help translating this information or need an accommodation, please contact LEP@ci.stpaul.mn.us or 651-266-8966.

Atención

Si desea recibir asistencia gratuita para traducir esta información o necesita un alojamiento, contactar a LEP@ci.stpaul.mn.us o 651-266-8966.

Lus ceev

Yog koj xav tau kev pab txhais cov ntaub ntawv no los sis xav tau kev npaj kom yooj yim, ces thov tiv toj LEP@ci.stpaul.mn.us 651-266-8966.

ဒိကန့်

နမ့်လိာ်ဘဉ်တၢ်မၤစၢၤလၢတၢ်ကွဲးကျိာ်ထံဘဉ်တၢ်ဂ့ၢ်တၢ်ကျိၤအံၤ မ့တမ့ၢ် လိာ်ဘဉ်တၢ်ဟ့ၣ်ကူၣ်ဟ့ၣ်ဖးန့ၣ် ဝံသးစူၤဆဲးကျါ LEP@ci.stpaul.mn.us 651-266-8966.

Fiiro gaar ah

Haddii and rabto in macliiumaadkan lagu tarjumo ama and u baahantahay adeeg nala soo xiriir LEP@ci.stpaul.mn.us 651-266-8966.



SAINT PAUL
HUMAN RIGHTS & EQUAL
ECONOMIC OPPORTUNITY

Department of Human Rights & Equal Economic Opportunity

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