

To: Mayor and City Council

Elaine Hart, Deputy City Manager
Brion Oaks, Chief Equity Officer From:

Date: August 19, 2019

Report on Civil Rights Enforcement – Staff Report (Resolution 20180628-062) **Subject:**

The purpose of this memo is to provide a report and update to Resolution No. 20180628-062, which called for the review of possible structures for civil rights enforcement. Currently, the City of Austin's Equal Employment & Fair Housing Office (EEFHO) is empowered to enforce business regulations and laws against discrimination in employment, housing, and public accommodation. EEFHO also provides education and outreach to the residents of Austin through associated media plans to advance public knowledge of their legal rights and protections.

The Equity Office consulted with the Government Alliance on Race and Equity (GARE) to conduct a study to document how jurisdictions across the country are structured to accomplish civil rights enforcement. The nation-wide study included three elements: 1) an environmental scan, 2) a survey with key informants, and 3) follow-up interviews with key informants. The national environmental scan included a review of online materials, including institutional websites, municipal codes, strategic plans, annual reports, departmental audits, ordinances and mayoral decrees, and organizational charts. The scan sought to understand structure, accountability, and authority of a diverse range of civil rights enforcement entities, each representing a breadth of governmental systems, structures, and political climates. To augment the scan, a survey of Civil Rights Enforcement Directors from across the nation was performed.

The overall study focused on three main areas of inquiry to better understand the strengths, challenges, and opportunities for civil rights work within governmental contexts across the country. These areas of inquiry included:

1) Structure: What is the structure of civil rights enforcement bodies? How does the form of government impact the work of these entities and the ability of jurisdictions to carry out compliance, enforcement, and prevention?

- 2) Accountability: What is the relationship between the civil rights entity and to whom are they accountable? What institutional accountability mechanisms exist and how are entities held accountable to communities of color and those most impacted by discrimination?
- 3) Authority: What judicial powers do civil rights enforcement agencies hold and who holds authority over investigations? Who has the authority to hire and fire leaders? Who determines budget, work priorities, final review of reports and publications? Who makes final rulings on appeals?

Summary of Findings

Analysis of an environmental scan of 60 jurisdictions nation-wide revealed three major structural types, which were further reflected in our survey data and interview results. The three structures indicate where civil rights activities are housed within the given government.

Types 1 & 2: Jurisdictions that house civil rights enforcement as an independent entity with varying authority

Type 3: Combined jurisdictions that have civil rights and another department or office housed together

Civil rights respondents operating independently were more likely to mention themes of authority and autonomy when discussing the strengths in their structure, and the importance of having the capacity and focus necessary to be effective in their body of work. Civil Rights Enforcement Directors showed general agreement that their entities have sufficient authority in decision-making power. This was a similar trend across the three types of structures—with a majority either agreeing or strongly agreeing they had sufficient decision-making power. *Stronger* agreement was found among respondents located in separated offices civil rights only entities. In addition, interview respondents from jurisdictions with combined entities (Type 3) were more likely to note the implications of Housing and Urban Development (HUD) and Fair Employment Practices Agencies (FEPA) contracts and the prioritization of quantity of cases closed, push towards monetary settlement, and lack of focus on more systemic outcomes.

Recommendation

We are recommending an intentional and robust community engagement process that involves City staff, City Council, and community members to develop a model for civil rights enforcement that reflects the values and priorities of Strategic Direction 2023. Funding has been identified in the proposed FY2020 Budget to support this engagement process.

This civil rights engagement process should consider the inventory of the varying Civil Rights Office structures, levels of authority, and accountability mechanisms provided by the report in order to best determine what works ideally for the City of Austin. Success in protecting civil rights depends largely upon clarity and perception of purpose and vision, staff ability to leverage relationships, proximity to various positions of power, and resources that reflect racial equity as a priority.

In addition, the civil rights engagement process should include an assessment of our current civil rights related initiatives to determine the optimal design for civil rights enforcement for our city. This assessment process should review in which department civil rights initiatives are housed, the degree of

their effectiveness, and their strengths and challenges. Doing this would allow for comparison against patterns that emerged across other jurisdictions.

We are committed to convening a core team of City staff in Fall 2019 to begin this process, with the goal to provide an update with recommendations in January 2020. The full report is attached for further clarification. Please contact Jason Alexander with questions at (512) 974-2306.

Attachment: Report – Local Government Structures for Civil Rights Enforcement

Typology Sheet

cc: Spencer Cronk, City Manager

Assistant City Managers Department Directors

Local Government Structures for Civil Rights Enforcement

Report by: Government Alliance on Race & Equity

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Background

The City of Austin is charged through Resolution No. 20180628-062 to review possible structures for civil rights enforcement. The purpose of this study is to understand how jurisdictions across the country are structured to accomplish similar work. The findings will inform recommendations to structure and position civil rights enforcement in the City of Austin for future success.

In an effort to understand how jurisdictions across the country are structured to accomplish civil rights enforcement, a nation-wide study was performed. The study included three elements: 1) an environmental scan, 2) a survey with key informants, and 3) follow-up interviews with key informants. The national environmental scan included a review of online materials, including institutional websites, municipal codes, strategic plans, annual reports, departmental audits, ordinances and mayoral decrees, and organizational charts. The scan sought to understand structure, accountability, and authority of a diverse range of civil rights enforcement entities, each representing a breadth of governmental systems, structures, and political climates. To augment the scan, a survey of Civil Rights Enforcement Directors from across the nation was performed. Additionally, interviews were conducted with self-selecting Directors from the pool of survey respondents.

The overall study focused on three main areas of inquiry to better understand the strengths, challenges, and opportunities for civil rights work within governmental contexts across the country. These areas of inquiry included:

STRUCTURE: What is the structure of civil rights enforcement bodies? How does the form of government impact the work of these entities and the ability of jurisdictions to carry out compliance, enforcement, and prevention?

ACCOUNTABILITY: What is the relationship between the civil rights entity and to whom are they accountable? What institutional accountability mechanisms exist and how are entities held accountable to communities of color and those most impacted by discrimination?

AUTHORITY: What judicial powers do civil rights enforcement agencies hold and who holds authority over investigations? Who has the authority to hire and fire leaders? Who determines budget, work priorities, final review of reports and publications? Who makes final rulings on appeals?

Overview of Research & Methodology

Research

National Environmental Scan

In an effort to understand how jurisdictions across the country are structured to accomplish civil rights enforcement, a nation-wide study was performed. The study included three elements: 1) an environmental scan, 2) a survey with key informants, and 3) follow-up interviews with key

informants. The national environmental scan included a review of online materials, including institutional websites, municipal codes, strategic plans, annual reports, departmental audits, ordinances and mayoral decrees, and organizational charts. The scan sought to understand structure, accountability, and authority of a diverse range of civil rights enforcement entities, each representing a breadth of governmental systems, structures, and political climates. To augment the scan, a survey of Civil Rights Enforcement Directors from across the nation was performed. Additionally, interviews were conducted with self-selecting Directors from the pool of survey respondents.

Analysis of the environmental scan data of 60 jurisdictions nation-wide revealed three major structural types. The three structural types were further reflected in our survey data and interview results.

While these three types support a general typology of how civil rights is structured nation-wide, approaches to civil rights work appears to vary greatly, with complexity rampant in investigations, enforcement, compliance, appeals, and policy-making. There are also a significant number of jurisdictions who have undergone structural changes to their investigations and enforcement bodies, not only in name but also in function. This complexity is apparent not only in the scan but also in responses received through the survey and interviews.

Navigating the Scan

A spreadsheet of all scan findings has been provided as an appendix to this report. The following rubric outlines key research questions and where to find information for individual jurisdictions:

- What type of government does the jurisdiction have? (Columns T)
- Where is the entity located in relation to executive and legislative branches? (Column E)
- How is the director chosen and who do they report to? How is the Commission/Board chosen and who do they report to? (Columns H-I)
- What is the appeals process? (is it internal or external to the entity responsible for enforcement/investigation?) (Column J)
- What powers and responsibilities does the Commission/Board hold (including independence, appellate body, and judicial authority? (Column E, G, O)

As a stand-alone product, the national scan provides an overview of:

- Civil Rights Enforcement Structure, Authority, and Accountability
- Location of civil rights enforcement (where applicable)
- Form of government in relation to enforcement¹

2=Weak Mayor

3=Council Manager*

4=Board of Supervisors/County Executive

5=Commission/Manager

6=governor/senate

7=it's complicated/other

¹1=Strong Mayor

- Reporting relationships and degrees of autonomy
- Policy-making authority related to civil rights (where applicable)
- Community accountability and engagement in practice (where applicable)

Surveys & Interviews

We administered a questionnaire to potential survey participants for Civil Rights Directors (or equivalent). The survey included both multiple choice and open-ended questions to gather more detailed information about director perceptions and experiences fulfilling their duties to enforce civil rights. At the end of the questionnaire, survey respondents were asked whether they would be willing to participate in a brief follow-up interview, and interviews were conducted with those self-selecting individuals.

The data from the surveys and interviews is intended to fill gaps in information that is not available through departmental websites, municipal codes, or public reports, as well as document more nuanced understandings of capacity, accountability, authority, and decision-making capabilities. The open-ended interview questions were also designed to collect perceptions about the strengths and challenges related to form of government and proximity to the executive.

Methodology

Environmental Scan

Cities, counties, and states were identified that would represent multiple forms and levels of government. The sample included regional and state representation, with a focus on cities that would most similarly align with the scope and scale of the City of Austin. Directories of FEPA and HUD certified local enforcement agencies, as well as the Directory of the International Association of Human Rights Commissions were used to identify jurisdictions for the scan. Population size, demographics, median income, rates of U.S. born residents, and home-ownership rates were also considered to ensure that cities similar to Austin were included in the analysis. Due to the fairly limited sample size, efforts were made to include the majority of these jurisdictions. 138 jurisdictions were identified through this process, and 60 were selected to form the basis of the environmental scan.

Survey Outreach

As previously noted, Directors of Civil Rights were our population of interest. To obtain a sample of Directors in that capacity, several approaches were utilized. An electronic invitation to participate in the project was sent to 138 jurisdictions identified through the process outlined in the environmental scan section above. A total of 23 Civil Rights Directors completed the online questionnaire.

^{*}includes one Representative Town Meeting structure

Interview Outreach

Survey respondents who volunteered to participate in a follow-up interview were contacted to participate in a 30-45 minute telephone interview. Of the survey respondents, 13 had completed the questionnaire and indicated a willingness to participate in an interview.

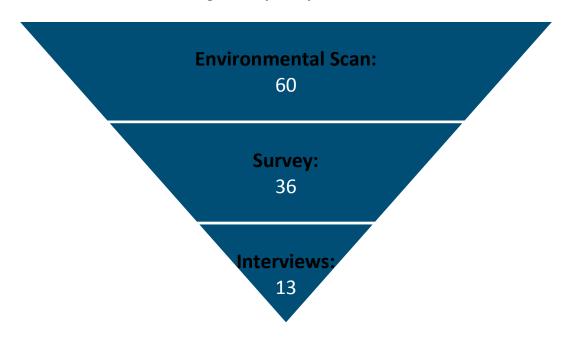


Figure 1

36 Jurisdictions participated in the survey66.7%--Cities

22.2%--Counties

11.1%--Statewide

Nationwide representation

41.1%--Midwest

25.0%--East/Northeastern States

16.7%--South/Southwest

16.7%--West/Pacific Northwest

Methodological Limitations

Environmental Scan Limitations

- Transparency of Government Websites
 - Government websites with limited information on civil rights enforcement and websites with difficult navigation features
 - Limited number of jurisdictions with recent annual or quarterly reports for civil rights offices
 - Outdated program information and/or annual reports not available for the past 1-3 years
- Divergence between organizational charts and reporting structures in practice

Municipal charters note reporting requirements to executive/council, but often do not specify approval process for publishing independent investigations and reporting on internal agencies.

Municipal charters and/or office websites note "dotted-line" reporting structures without clear picture of division of power between Executive and Legislative Branch (particularly in jurisdictions without a strong Mayor).

- > Divergence between policy and practice of accountability mechanisms
 - Limited information about policy-making processes and role of Directors vis a vis Mayor or Council approval.
 - Limited information about policy-making authority for entities serving in an advisory capacity
- > Limited sample size
 - There are a limited number of jurisdictions included in the study.

Survey and Interview Limitations

- Focus on Director-level perceptions
 - Outreach targeted those most likely to be knowledgeable of all aspects of project inquiry to ensure accurate responses on budget, staffing capacity, reporting structures, and proximity to potential political influence
 - To preserve integrity of data and prevent duplicative/contradictory data from jurisdictions, outreach included only leads from jurisdictions
 - Outreach was forced to rely on readily available contact information or personal contacts
- Due to lack of contact information for department employees in every jurisdiction, an all staff survey would have required Directors to volunteer to participate, which would have introduced bias due to self-selection Self-selecting nature of respondents
 - Directors volunteered to participate
 - Sensitive nature of sharing perceptions and opinions
- Disaggregated data analysis
 - Small sample size did not permit sophisticated analysis Due to complexity of forms of government, structure, and limited sample size, limited ability to identify major trends or comparative analysis of jurisdictions based on form of government and typology

Study Findings

The section is broken down into three sections: Structure, Authority, and Accountability. Within those sections, findings are organized by data source: scan, survey, and interview. The findings include analysis of structure types and trends emerging from each category. Any data that identifies specific jurisdictions has been pulled from the environmental scan. Data from interviews and surveys is confidential and will not be identified as specific jurisdictions, but as examples of a Type or trend.

Environmental Scan Findings: Structure

Civil Rights Enforcement Responsibilities

Overview: Housing, Employment, and Public Accommodations

The majority of jurisdictions in the environmental scan are authorized to enforce federal statutes and ordinances. These jurisdictions complete three years of interim certification and are then certified for five years under the <u>Substantial Equivalence Certification</u>. Following federal protocols, local government investigates claims and issues findings pursuant to federal standards.

- Fair Housing Assistance Program: There are currently agencies in 39 states participating in the Fair Housing Assistance Program; 16 of these states have agencies located in local government in addition to state level Civil Rights Offices. Under Title VIII of Civil Rights Act of 1968, the Fair Housing Act recognizes seven protected classes: race, color, religion, sex, handicap, familial status, and national origin. Under municipal law, the City of Seattle is also responsible for 11 additional protected classes recognized by the municipal code.
- Fair Employment Practice Agencies (FEPAs): The Equal Employment Opportunity Commission (EEOC) current contracts with 90 agencies across 15 nation-wide districts and 53 total field offices. Most employers with at least 15 employees are covered by EEOC laws (20 employees in age discrimination cases). Most labor unions and employment agencies are also covered. The laws apply to all types of work situations, including hiring, firing, promotions, harassment, training, wages, and benefits.
- Americans with Disabilities Act (ADA) (1990): The ADA is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications. There are five sections of the ADA (amended in 2008); Title II of the ADA prohibits discrimination against qualified individuals with disabilities in all programs, activities, and services of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.

Civil Rights Investigations

Complaints Process

- The majority of jurisdictions centralize complaints (housing, employment, and public accommodations) processes within one entity, typically a Human Relations Commission or Human Rights Commission. Commissions tend to be staffed by the Director and employees of aligned Office/Department.
- In states where civil rights enforcement is handled at the state level, local investigations are often limited to employment complaints with internal departments and public accommodations/ADA complaints.

- In jurisdictions with limited civil rights enforcement authority, Equal Opportunity
 Offices, Constituent Relations, and ADA coordinators often play a referral role to state
 level enforcement bodies.
- In larger jurisdictions, equal opportunity officers are often located in multiple departments that report or refer complaints to Human Resources or equivalent.
- In many jurisdictions, particularly medium-to-large cities, there is a separate intake division or staff dedicated to reviewing complaints and determining legal thresholds to proceed.
- Human Resources Departments often process intakes and refer complainants to the appropriate state entity (in the case of counties, often refer to city level entity for public accommodations and housing).

Investigations & Findings

- In the majority of jurisdictions, Commissions and/or Civil Rights Offices hold quasijudicial powers, with at minimum the authority to investigate complaints, pursue mediation or alternative dispute resolution, settle cases, issue findings, and recommend cases for public hearing.
- In jurisdictions with quasi-judicial Commissions, hearing panels are often composed of a certain number of Commissioners that were not involved in the investigation; in other cases, hearing panels are composed of private attorneys and staff from the City Attorney's Office/Law Office, in addition to Commissioners. In a limited number of jurisdictions, hearing panels are composed of community volunteers appointed by the Commission.
- In the majority of jurisdictions, Chair of the Commission or the staff Director of the Commission/Office has the authority to issue findings.
- Slightly fewer jurisdictions authorize Commissions to revoke licenses and/or pursue monetary claims from businesses in violation of civil rights law.
- Slightly fewer jurisdictions have Directors of Commissions or Offices with subpoena power; often subpoena power is held in the Legal Department/City Attorney's Office/ Administrative Trial Division.

Appeals

- In the majority of jurisdictions, findings issued by the Chair or Director are considered final.
 In these jurisdictions, appeals often revert back to Chair or Director for reconsideration.
- In some jurisdictions, findings are sent for review and approval to Mayor, Council, and/or City Attorney.
- In many jurisdictions, appeals are sent directly to district or state court.
- In a few jurisdictions, particularly with Strong Mayor form of government, Mayor has authority to overrule findings of Chair/Director.

Overview: Structures for Civil Rights Enforcement

The three structural types help form the basis of our analysis. These structural types identify whether a jurisdiction houses civil rights and another department or office in the same entity (e.g., combined office, department, or division).. The types also help to identify the reporting structure and relation to both the Executive and Legislative branches of government. In some cases, civil rights enforcement authority (both the type of discrimination complaint handled as well as judicial powers of a local enforcement entity) is limited due to a) state-level pre-emption of local enforcement of state and federal law and/or b) county jurisdiction over civil rights complaints.

The survey respondents and interview participants from the Civil Rights Director survey identified structures that aligned with the three types emerging from the national environmental scan. Please note, however, the example jurisdictions provided below are drawn from the environmental scan results.

Table 1. Types of Organizational Structure

1. INDEPENDENT CIVIL RIGHTS ENTITIES: COMPLETE	2. INDEPENDENT CIVIL RIGHTS ENTITIES: LIMITED	3. COMBINED
Civil Rights only with quasi-judicial powers	Civil Rights only; limited judicial authority	Civil Rights and another department or office housed together

- Type 1: Independent Civil Rights: Complete -- Jurisdictions that house civil rights enforcement as an independent entity with quasi-judicial powers. Civil Rights Enforcement is located in a stand-alone office / department / commission
 - Ex. The Minneapolis Department of Civil Rights
 - Ex. Fairfax County Office of Human Rights
- Civil Rights Enforcement is located in an independent office / department / commission
 - Ex. Boston Civil Rights within the Department of Health and Human Services and Fair Housing Office & Commission
 - Ex. Louisville Civil Rights within the Louisville Metro Human Relations Commission
- Civil Rights Enforcement located in a stand-alone Office/Department with an internal, independent Human Rights Commission
 - Ex. Alexandria Office of Human Rights
 - Ex. Washington D.C. Office of Human Rights

- > Civil Rights enforcement is located within an Administrative or Service Department
 - Ex. Raleigh Office of Civil Rights (Community Services Department)
- > Limited civil rights enforcement occurs via individual staffers or other departments
 - Ex. Oakland Equal Employment Investigations and Compliance Department

Type 2: Independent Civil Rights Enforcement: Limited -- Jurisdictions that house civil rights enforcement as an independent entity with limited judicial authority.

- Ex. Lincoln Senior Civil Rights Investigator within the City Attorney's Office
- Ex. Peoria, IL Equal Opportunity Office (with recent hire of Chief Diversity & Inclusion Officer)

Type 3: Combined -- Jurisdictions that have civil rights and another department or office housed together

- ➤ Civil Rights enforcement and another entity are housed together in an office/department, with various reporting structures (i.e. Director is part of the Executive Team, Director reports to Mayor, Director reports to Deputy City Manager or City Manager)
 - Ex. St. Paul Department of Human Rights & Equal Economic Opportunity
- ➤ Enforcement and another department or office are housed together in an independent entity (Directors report to Executive and/or Commission)
 - Ex. New York City Human Rights Commission
 - Ex. Michigan Department of Civil Rights
 - Ex. San Francisco Human Rights Commission

Across all jurisdictions, a large variation in structure emerged, notably as it relates to strong mayoral jurisdictions and council-manager jurisdictions. This suggests there is an opportunity to consider the structures and strategies of jurisdictions with different civil rights alignments. The majority of jurisdictions included in the environmental scan house civil rights enforcement (housing, employment, public accommodation) in one entity, although some larger jurisdictions have multiple points of intake for complaints beyond their centralized enforcement entity. In jurisdictions that have Equal Opportunity Officers/Coordinators, these positions tend to sit either within central Civil Rights office OR within Human Resources/Human Services. Sometimes these positions play a role in the appellate process after a Commission's finding. Similarly, ADA Coordinators often sit in centralized civil rights enforcement entity; Disability Commissions often located in executive offices/Commissions. Typology 3 (Civil Rights Only) tend to house civil rights enforcement in independent Human Relations Commissions with direct report to Executive.

Trends: Organizational Structure for Civil Rights Enforcement

- Intake, investigation, conciliation, and compliance housed internally in one office/department
- > Dedicated offices or division for conflict resolution and/or mediation
 - New York City Human Rights Commission's Office of Mediation and Conflict Resolution
 - City of Albuquerque Alternative Dispute Resolution Program (within Legal Department)
 - Philadelphia Community Relations Division (within Human Relations Department) handles most matters of intergroup conflict and neighborhood disputes within the City, and offers mediation, conciliation, counseling, and referral services for individuals and households in conflict.
 - Chicago Inter-Group Relations (IGR) Community Mediation: IGR responds to requests from individuals or communities who are involved in a dispute and attempts to reach a resolution. A staff mediator can facilitate the communication between people in conflict and help each party understand the other person's point of view and rights.
- Intake and mediation/conciliation housed internally; investigation and enforcement external.
 - Sometimes, particularly in smaller jurisdictions, complaints that have preliminary reasonable cause are passed on for investigation to other departments, specifically the City Attorney's Office, Legal Department, and/or Office of Administrative Trials & Hearings provide attorneys.
- Separate units within centralized entity to promote impartiality and distinguish between enforcement and community relations mandate (i.e. Law Enforcement Bureau and Community Relations Bureau)
 - Ex. San Francisco Human Rights Commission
 - Ex. NYC Human Rights Commission
 - Ex. Pittsburgh Commission on Human Rights
 - Ex. Pittsburgh Office of Municipal Investigations

Box 1. Promoting Impartiality and Division of Responsibility		
Minneapolis Department of Civil Rights	Anchorage Municipal Ombudsman's Office	

Complaint Investigations Division-handles all discrimination complaints. The director of Minneapolis Department of Civil Rights may assess complaints at intake to dismiss or pass to Commission. Director may request enforcement decision from district court for respondents to comply with Hearing Order.

- Housed under the Legislative Assembly
- Established in addition to other remedies or rights of appeal, as an independent, impartial municipal office, readily available to the public, responsible to the Assembly.
- Empowered to investigate the acts of Municipal agencies and the Anchorage School District, and to recommend appropriate changes toward the goals of safeguarding the rights of persons and of promoting higher standards of competency, efficiency, and equity in the provision of municipal services. Complaints alleging discrimination are usually referred back to the Anchorage Equal Rights Commission.

Budget & Staffing

Budget and staffing were also of interest. The following data was pulled from jurisdiction websites, Annual Reports, and Budget Reports. In some instances, staffing capacity and enforcement data were not readily or publicly available; in other cases, civil rights enforcement work budgets were not disaggregated from umbrella department budgets and were, therefore, not included in this chart.

Table 3. Budget and staffing in the national environmental scan

Jurisdiction	Budget	Staff	Cases
Albuquerque NM Population: 558,545	Office of Equity & Inclusion and Civil Rights Unit located within Legal Department. Legal Department Budget: \$6.2 million 2019	Unknown	2017 rates of cases: # ADA cases closed: 75 # Employment cases closed: 30 # Housing cases: 50 #Other cases closed:200 Referral (passed to more appropriate agency after intake): 100 # of mediations/facilitations: 105
Baltimore, MD Population: 611,648	Community Relations Commission: 2018 Budget 1.89 million		
	Discrimination complaint investigations is 50.8% of that budget		
Kansas City, MO	Human Relations budget FY19-2020: \$2.5 million 27.5 FTE	FTE: 27.5 FTE	Within Human Resources Department (separate from Human Relations Department):

Population: 488,943	for entire department		Labor and Employee Relations: Budget for LER: \$979,613 FTE: 11 EEO complaints received: 120 Grievances/appeals: 71
Madison, WI Population: 255214	2019 Adopted: Civil Rights 1,855,926	FTE 2018: 18	
Minneapolis, MN Population: 422,331	Civil Rights FY 2018: 4,866,000 FY 2016-2017: \$3.63 million (overall CR budget); 23 staff across all divisions. Complaints Investigation Division recommended budget 2016: ~\$600,000. Employment Equity: \$630,000 Race & Equity within City Coordinator's Office 2018:	2018: 30 FTE within Civil Rights Department	Commentary on investigator-population ratio: Seattle labor standards investigator: ratio is approximately 1 to 60,400 (12 investigators for a population of 724,745 in July 2017). That same calculation for Minneapolis is approximately 1 to 211,200 (2 investigators for a population of 422,331 in July 2017)

	General Fund: \$486,000 Other Funds: \$950,000		
Multnomah County, OR Population: 748031	2019: \$500,000 to implement the employee-driven Workforce Equity Strategic Plan and an organizational consultant's recommendations on the county's training, policies and employment practices.	FTE: 6	
New York City, NY Population: 8.623 million	\$14.7 million 2018	130-150 staff (includes Bureau based Community Service Center staff)	Complaints filed 2017: 747 Determinations & Resolutions: 609 Most frequent: Employment & Housing
Philadelphia, PA Population:	2019: \$2,202,336	FTE: 32 (2017)	CHR receives \$700 for each dual-filed discrimination case it investigates and closes under contract with EEOC as a Fair Employment Practices Agency (FEPA). In FY17, the PCHR received \$139,000 from the EEOC.

1.58 million			In FY18 the PCHR anticipates closing 159 FEPA cases generating \$125,000 from its case closings.
San Francisco, CA Population: 884,363	2017-2018 Adopted Budget: 3,187,554	FTE: 17 (per 2017 Annual Report)	2017 637 unique public inquiries 230 intakes conducted 65 complaints filed 20 formal mediations
St Paul, MN Population: 306,621	2018-2019 Budget of Office: \$4.73 Million (24.7% is budget for River Print press division)	FTE: 31.00 1 director 11 Contract Compliance 7 Human Rights 3 River Print 9 Contract Analysis	2018: Human Rights investigators opened 79 new cases and collected \$34,000 in settlements for individuals filing complaints. The majority (63%) of cases were related to allegations of employment discrimination. Hundreds of inquiries about the Earned Sick and Safe Time ordinance, 37 formal complaints were received. Case load by intake year has declined from a high of 121 cases per year in 2008 to 51 cases in 2016.
		In order to better serve all Saint Paul residents, the 2019 budget includes the addition of one employee to	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. 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.

		coordinate Multilingual Engagement and Communicati on (MEC) and compliance with the American with Disabilities Act (ADA).	The Police Civilian Internal Affairs Review Commission (PCIARC) was moved to HREEO in 2017. The commission reviewed 29 cases including 54 officers and 63 total allegations.
Washington D.C	Office of Human Rights 2019 \$5,566,569	45 FTEs	FY2018: Inquiries rcvd-1483, intakes conducted-563
Population: 693,971			

Structural Changes for Maximum Effectiveness

A number of jurisdictions have undergone structural changes in the last 5-10 years, both in name as well as in structure and positional authority. Trends to decentralize civil rights enforcement functions to better equip staff to manage the work load has been matched by efforts to centralize some functions to streamline work and make services more accessible. In some cases, efforts to silo different aspects of the work have attempted to communicate the priorities of a particular agency.

- Decentralizing functions
- Larger jurisdictions have the ability to silo departments and increase neutrality, i.e. NYC has
 a separate Office of the Chairperson who is not involved in investigations or public hearings
 to process appeals.
- Washington DC Office of Human Rights (2018) established a separate and distinct Intake Unit to handle OHR's large volume of inquiries and docketed complaints and eliminate delays in processing.
- Dubuque City Council (2018-2019) approved hiring a civil rights investigator in the Legal
 Department to process both external and internal complaints. Formerly, these were
 processed by Human Rights Department and Personnel Department, respectively. The new
 position will operate under the City Attorney, does not operate under the City Manager and
 is appointed by Council.

Additional Functions of Civil Rights Enforcement Entities

Civil Rights Enforcement entities are charged with a number of additional duties related to civil rights, protected classes, policy implementation, and community engagement. Almost all jurisdictions included in the scan were tasked with public education and awareness raising. Most jurisdictions highlight that communities are the target audiences for their trainings and education opportunities, while a few specify their relationships and responsibilities towards businesses and employers. A selection of additional functions performed by civil rights entities can be found below.

- Policy Enforcement
- San Francisco Human Rights Commission: Implementing the Sanctuary Cities Ordinance
- Washington D.C. Office of Human Rights: Enforcement of District of Columbia Bullying Prevention Act of 2012
- Issue-Area Task Forces
- New York City Bias Response Teams
- Philadelphia: Fair Criminal Record Screening Standards Law, or "Ban the Box" Coalition for Restaurant Safety and Health and Interagency Civil Rights Task Force that is made up of local, state, and federal law enforcement agencies and community partners who work to prevent intergroup tension and bias crimes.

Community Services

- Community Relations Bureau supports formerly incarcerated individuals in the re-entry process: New York City Commission on Human Rights
- Language Access Programs: San Antonio, NYC, DC
- U&T Visa certifications: New York City Commission on Human Rights
- St Paul Vendor Outreach Program (VOP) is a small business assistance program for small, woman-, and minority-owned business enterprises
- Atlanta Human Rights Commission is mandated to convene conferences on public accommodations, private employment, and housing and work with leaders in these fields in developing programs of voluntary compliance and enforcement of the Human Relations Code

Surveys & Interviews Findings: Structure

Overview: Budget and Staffing

Survey respondents were asked to report on the number of employees in their department and their annual budget. All jurisdictions who receive 200-499 complaints annually and have a staff of more than 20, reported an annual budget of \$3.0 million or more. For those who receive 500 or more complaints annually and have a staff of more than 20, 16.7% reported an annual budget between \$1.0 and 1.499 million, while the remainder reported a budget of \$3.0 million or more.

Capacity

Annual Reported Budget and Complaints among Civil Rights Directors

Civil Rights Director survey respondents' annual budget was explored by the size of employees. As would be expected, reported annual budgets increased as employee size increases (See Table 4).

Table 4. Annual Budget by Employee Size among Civil Rights Director Survey Respondents

Budget	1-5 Staff	6-10 Staff	11-20 Staff	More than 20 Staff
Less than \$100,000	37.5%	40.0%	-	-
\$100,000-\$499,999	37.5%	20.0%	-	-
\$500,000-\$999,999	12.5%	40.0%	-	-
\$1.0 million-\$1.499 million	12.5%	-	100.0%	-
\$1.5 million-\$2.999 million	-	-	-	14.3%

\$3.0 million or more	-	-	-	85.7%
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Civil rights directors were also asked to report the number of complaints filed in their office annually. The most frequently noted amount among respondents were 500 or more complaints (30.4%), followed by 50-99 complaints (21.7%) (See Table 5).

Table 5. Percentage breakdown of annual civil rights complaints, as reported by Civil Rights Director Survey Respondents

Complaints	Percent
0-49	17.4%
50-99	21.7%
100-199	17.4%
200-499	13.0%
500 or more	30.4%

Structures for Civil Rights Enforcement

In terms of civil rights enforcement activities, Civil Rights Directors were asked to indicate the breakdown of complaints they undertook, across the domains of housing, labor standards, public accommodations and other complaints. Respondents indicated wide variation in the composition of their complaints across the complaint types (See Table 7).

Table 7. Reported percent of civil rights complaints across complaint types, as reported by civil rights directors

TYPE OF COMPLAINT	MINIMUM PERCENT OF TOTAL CASES PROCESSED	MAXIMUM PERCENT OF TOTAL CASES PROCESSED
Housing	0%	57%
Labor Standards	0%	19%
Public Accommodations	0%	40%

Other	1%	67%

Trends observed by Civil Rights Directors (as reported during interviews)

- Increase in cases filed in complaints related to immigration issues
- Increase in cases filed related to disability
- Decrease in overall number of complainants since 2016 election, particularly in certain states

Strengths and Challenges of Civil Rights Enforcement-Independent vs. Combined

All survey respondents and interview participants were asked to reflect upon the strengths and challenges of their existing structure. Qualitative responses were analyzed to produce major themes. Results below are presented across the three primary structures of civil rights previously highlighted: independent/exclusively civil rights (Type 1 + 2) and combined entities (Type 3).

Strengths of structure

Type 1+2: Strengths of Independent Structures

Civil rights respondents mentioned themes of authority and autonomy when discussing the strengths in their structure, and the importance of having the capacity and focus necessary to be effective in their bodies of work. Respondents mentioned the importance of collaboration with external parties, both within government as well as community, and also leadership support to carry out their work. A survey respondent noted that the two biggest strengths of being a separate entity were "The flexibility to focus on discrete areas and flexibility to collaborate with other agencies and community partners to develop solutions," and "buy-in from Mayor and city council/state legislator buy-in from community leaders."

One civil rights survey respondent remarked that their local ordinance with additional protected classes was a strength in their work.

Type 3: Strengths of Combined Structures

When asked about the strengths of the current structure of work, most respondents did not have particularly strong opinions about the pros of centralizing civil rights with another office or department. Leadership buy-in, including support from executives was a more common theme. Many highlighted the strengths of their individual teams, hiring the right people with the right skills.

Challenges of Structure

Type 1+2: Challenges of Independent Structures

In addition to general funding challenges, one survey respondent noted "our greatest challenge is probably resources to do the work we want to do. Typically, we have more resources for law enforcement than community education and policy."

Type 3: Challenges of Combined Structures

Many directors noted federal funding in particular, noting the "biggest challenge is the reliance on federal funding. Federal funding pays for about 60-70% of staffing. General fund pays for the remainder. It is very difficult to get additional general fund dollars to expand and grow work, outreach, etc." For combined structures, finding staff that had the ability to carry out both civil rights work requiring one particular set of skills, along with the additional requirements of the office it had been combined with presented challenges (Ex. Civil Rights embedded into Human Resources or Civil Rights embedded in Law Dept.)

The number one concern raised in the civil rights survey across all structures was budget and staffing. "Available staffing resources in all Departments to further actualization of goals."

Environmental Scan Findings: Authority

Authority in civil rights enforcement work comes from several different factors, including the appointment process for Directors and Commissioners, internal reporting structures, and relationships with the executive and legislative branches. There are also factors that can lead to increased autonomy of decision-making and policy-making that minimizes undue influence from external parties, and there are different levels of legal authority for enforcement and compliance.

Appointment Processes & Internal Reporting Structures

Civil Rights Enforcement: Directors & Commissioners

Strong Mayor Civil Rights Director Reporting

In strong mayor governments, nearly all civil rights directors are appointed by the Mayor and are subject to removal by the Mayor, with council approval.

- Philadelphia Director of Human Relations Office: Appointed by Mayor, Executive Director of the Commission
- Washington DC: Director of the Office of Human Rights reports to Deputy City Mayor of Public Safety & Justice, within executive branch
- Commission-appointed Directors, Mayor-appointed Commissioners

In many strong mayor governments, the Commissioners are appointed by the Mayor and approved by the City Council, reflecting the same reporting structure as the civil rights directors. However,

there are some jurisdictions where the Commission has the authority to independently appoint the staff Director.

- Director of the San Francisco Human Rights Commission is appointed by the Chair of the Commission, with approval of the Commission; Commissioners are appointed by Mayor
- Director of Gary Human Relations Commission is appointed by the Commission,
 Commissioners appointed by the Mayor
- Boston Fair Housing Commission: 3 years, 5 seats, appointed by Mayor-- Director of Commission is appointed by Commission
- Commission on Citizens' Rights and Community Relations of the City of Buffalo has a director selected by the Commission, whose 11 members are appointed by the Mayor

Direct Report to Strong Mayor

- Boston Fair Housing Commission: Can create and empower subcommittees to investigate problems of discrimination in housing; reports to Mayor and City Council with findings of discrimination complaints
- Chicago Commission on Human Relations: Four Advisory Council Chairs and 15 other members all appointed by the Mayor and approved by Council; each Advisory Council has 21 members appointed by the Mayor and approved by Council. The Commission also has an outward facing Board of Commissioners serving as the community voice of the department and receiving reports on the department's work from staff. The Board also reviews and recommends policies to address issues of discrimination and prejudice.

Box 3. Examples of mayoral authority in strong-mayor jurisdictions

- In Atlanta, GA, the Mayor can inquire as to whether there is due cause for revoking professional or business licenses, ask a city agency to investigate alleged offenders or patterns of violations from an offender, request community agencies to investigate whether an offender has violated other state or federal laws.
- In Miami-Dade County (strong county mayor structure), the Commission on Human Rights Director is appointed by and reports to the County Mayor; the Mayor is also responsible for appointing any of the Director's assistants. After Directors have issued findings on complaints, the Mayor or Mayor's designee may sustain, reverse or modify the Director's decision.

Council-Manager

In council-manager governments, directors are predominantly appointed and approved by City Manager & Council. In 2-3 jurisdictions found in the scan, the position is filled through a regular recruiting and hiring process, with the final decision approved by Council or the Commission.

- City Manager & Council: Des Moines Human Rights Commission Director appointed by City
 Manager (policy implementation/code enforcement/administrative branch)
- City Manager & Council: Dubuque Human Rights Director appointed and reports to City
 Manager, Dubuque Human Rights Commissioners appointed by City Council.

In council-manager governments, often times the Director has a different reporting line than the Commission Chair, including in Alexandria Virginia. The Human Rights Commission has fourteen members, each appointed by City Council. 14 members, all appointed by City Council (legislative)-different report than Director of Office, who is appointed by City Manager and reports to Deputy City Manager

In council-manager governments, there are a number of Commissions whose authority is limited by the Council's right to overrule or veto their decisions. For example, the Austin Human Rights Commission is deemed a sovereign body with 11 members, 1 appointed by the Mayor and 10 by Council. The Commission holds subpoena power, investigative power, can hold public hearings, serves as an advisory body to all Council, Mayor, departments, and agencies. City Council can overrule or disregard any Commission recommendations.

- Examples of Council or Administrator authority over Commissions and Directors
- Austin Civil Service Commission, as the independent Commission ruling on employment decisions, has the authority to overrule City Manager final decision on firing decisions. Commission reports to City Council, Council has power to determine what the Commission can investigate, demotes Manager power. The Commission is appointed by Council members.
- Brookline Town Administrator can change the location of the Director at any time based on where they would be most effective (stipulated in town charter).
- Appointments and Reporting in Other Forms of Government
- County: Fairfax County Board of Supervisors selects its Human Rights Commissioners. The
 Director of the Office of Human Rights has multiple reporting lines to Executive and the
 Commission, and the position is appointed and approved by the County Executive and the
 Board of Supervisors.
- County: Pinellas County Office, FL Office of Human Rights operates under the direction of the Human Rights' Board and is headed by the Director of Human Rights. The director is appointed by and answerable directly to the Human Rights' Board. Coordinating relationship with County Attorney and City Administrator, no direct authority report to Board of County Commissioners.
- Town Meeting/Administrator: Brookline Director of the Office of Diversity, Inclusion and Community Relations: also serves as the Chief Diversity Officer, is appointed by the Select Board. The position is the equivalent of a Department Head/Senior Administrator, reports to Town Administrator.
- Strong Council: Minneapolis Civil Rights Director is one of only two positions that report directly to the Mayor, the other is the Chief of Police. All other departments report to the

executive committee, made up of the Mayor, Council President, Vice President, Majority Leader, Minority Leader, and City Coordinator.

Variations in structure for increased autonomy and/or decreased political influence

- Dotted-line structure of autonomy in Strong Mayor Government
- St. Paul: Human Rights & Equal Economic Opportunity Commission (HREEOC), with 21 members, has dotted line independence between the Mayor and City Council
- Director reporting, accountability, and yearly review shared with Commission
- St. Paul (strong mayor) has a particularly strong review process for its Director of HREEO. This position has general supervision over all programs of the city with respect to human and civil rights, subject to policies established by the Mayor. The Director reports to the Commission, and prior to 120 days from the expiration of the director's term, the commission reviews the work of the Director and recommends to the mayor whether the director should be re-appointed.
- Commissions housed within an Office functioning independently
- DC Human Rights Commission has 15 commissioners nominated by the Mayor and approved by Council. It is housed within the Office of Human Rights and is adjudicatory and handles private entity investigations. Although the Commission is within OHR, the Commission acts independent of OHR in order to adjudicate cases in an impartial manner. Administrative law judges are also housed within the Commission.
- Strong Commission in Washington D.C. applies a secondary review of all cases prior to cause finding regardless of the Office of Human Rights investigation.
- Alternatives to direct executive report: There are some instances across multiple forms of government where Human Rights Commissions are located in Administrative Divisions, one or two steps removed from direct report to Executive leadership
- Boston Human Rights Commission Director reports to Director of Health and Human Services
 Department; HHS Department reports to Chief of Staff.
- South Bend Human Rights Commission is located in the Administration and Finance Division
- City of Austin Equal Employment and Fair Housing Office is located within Human Resources
 Department, HR Director reports to Deputy City Manager under "Government that Works for All" Branch.
- Cambridge Human Rights Commission is located under General Services, with the Executive
 Director reporting via Deputy City Manager.
- Mixed appointment process allowing both the executive and legislative branches appoint a certain percent of the Commissioners
- Seattle Human Rights Commission: Eight members shall be appointed by the Mayor, eight members shall be appointed by the City Council, and four members shall be appointed by the Commission as constituted; provided, that such appointments shall be made so as to reflect the diversity of the community.

- Atlanta Human Relations Commission (strong mayor): consists of seven members with three-year, staggered terms. Two are appointed by the Mayor of Atlanta, two by the President of the Atlanta City Council, and three by the at-large Members of the Council.
- Fort Worth Human Relations Commission: Administrator is appointed by Legislative and Intergovernmental Affairs Committee, approved by the City Council. Terminating the administrator requires Commission and City Manager approval, with the Council breaking any disagreements.
- South Bend Human Rights Commission: Members of the Commission may be removed by the appointing authority for just cause. Split appointment between Common Council and Mayor.

Box 4. Strong Commission Authority

- Philadelphia Commission on Human Relations: authorized to issue cease and desist orders.
- New York City Commission on Human Rights: authorized to impose civil penalties up to \$125,000 for violations, and up to \$250,000 for violations that are result of willful or malicious intent.

Decision-Making and Policy-Making

Civil Rights Policy-Making-Overview

The role of civil rights directors in policy making is predominantly focused on contract compliance, disability rights, and affirmative action plans, with the responsibility to develop and recommend policy to the Executive/Legislative branch. Policy-making authority is limited in most strong mayor jurisdictions; Directors and Commissioners usually function in an Advisory Capacity.

- Commissions in strong mayor government with predominantly advisory policy role
- Atlanta Human Relations Commission is tasked with developing human relations policy for the city.
- Boston Fair Housing Commission and Human Rights Commission can make policy recommendations to Council.
- City of Madison Civil Rights Director oversees development, approval, and implementation
 of all affirmative action plans, and Contract Compliance Program, and provides overall
 leadership to civil rights policies and programs development and enforcement city-wide.
- Miami-Dade County Office of Human Rights and Fair Employment Practices (jurisdiction with a strong "county-mayor" government) is responsible for developing departmental affirmative action plans, but subject to the approval of the County Mayor and County Attorney.
- Nashville Metro Human Relations Commission is tasked with developing data-driven and equity-oriented policy papers regarding issues of inclusion in Davidson County. These

- projects identify points of intervention, craft short and long-term recommendations, but the legislature or executive have no obligation to take the recommendations into account.
- Commissions in strong mayor government with expanded policy-making authority
- San Francisco Human Rights Commission (HRC): Hearing topics are generated from HRC advisory committees, community members, complaints, panel discussions, national events, commissioner inquiry and/or department requests. HRC staff drafts a report summarizing the hearing testimony. Included in the report are findings and recommendations issued by the Commission. In addition to generating reports based on testimony derived from public hearings, HRC also generates reports based on independent research, investigation and analysis.
- Other forms of government
- Brookline MA: Collaborative efforts between the Human Resources Director, Commission, and Human Resources Board prepare and submit to Select Board of resulted in the town's diversity and inclusion policy, including equal employment opportunity and affirmative action, and recommended implementation procedures. The Commission has the ongoing authority to review trends and recommend steps for preventing discrimination via amendments to policy. May submit local or state-wide proposed legislation, after approval by the Select Board and review by Town Counsel.
- Minneapolis, MN: Director of Civil Rights has the authority to exercise leadership under the direction of the Mayor in the development of civil rights policies and programs, and make recommendations to the mayor, the commission and the city council for consideration and implementation. The Commission may propose or amend rules through a public hearing, followed by a review in the City Attorney's Office; final amendments are approved or denied by City Council.

Policy Authority Areas

- The majority of civil rights entities, including Commissions, have authority to promulgate policies necessary to enforce civil rights ordinances
- Civil Rights entities often have some jurisdiction over EEOC policy, Fair Housing/Affordable Housing policy, and Human Resources and Workforce Equity
- Boston Municipal Affirmative Action Officer: within the Mayor's Office, audits all departmental AA plans, and oversees/implements WMBE Procurement plans
- Austin City Council (February 2016) adopted a resolution which allows City staff to modify a
 City of Austin requirement (related to residential property) for a person with a disability and
 outlines a process for how to request reasonable accommodations.

Investigative & Judicial Authority

Self-Initiated Investigations

- A growing number of jurisdictions have civil rights enforcement entities with the power to initiative investigations into systemic behavior or suspected patterns of violations, both of private parties as well as internally.
- Washington D.C. Office of Human Rights recently began a pilot initiative called the Proactive Enforcement Initiative to use a powerful tool that District law makes available to the Director of OHR to investigate a situation in the city that may have risen to the level of discriminatory practices or policies. The purpose of this initiative is to transform OHR to be a more proactive civil rights enforcement arm.
- New York City Commission on Human Rights: Law Enforcement Bureau (LEB) can accept complaints from the public about personal experiences, a lawyer can file a complaint with LEB on a client's behalf. Service providers, community organizations, elected officials, or individuals may bring specific incidents or potential patterns of discrimination to LEB's attention, and LEB can initiate its own investigation.
- Chicago Commission on Human Relations (via testing program) and recently developed authority to initiate their own complaints; example: another department is doing something problematic, which would allow Commission to file the complaint and would then result in resolving with department and Mayor.

Judicial Authority

The role of legal departments varies greatly across jurisdictions. Some play a central role in investigating and carrying out enforcement and violations settlements. Other City Attorneys, the majority appointed by Council and operating independently, play more of an advisory role to all policy making and finalized legislation put forward to Council. For example, in many cities the city attorney oversees Contract and Procurement Policy and Compliance, as well as legislative recommendations to Council. There is variation across jurisdictions as to whether a Commission or a Legal Department is responsible for convening and serving on a Public Hearing for cases. In some cases (such as the City Attorney's office in Alexandria Virginia), the city attorney not represent either the commission or the director in any case in which the city or any department or agency is a respondent. The Commission and/or Director is required to hire a private attorney.

- Civil Rights offices housed within (or report to) the Legal Department
 - The Albuquerque Office of Civil Rights is located in the Legal Department and has a direct reporting relationship to the City Attorney.
 - Lincoln, Nebraska, the City Attorney supervises the Law Department, and the Senior Civil Rights Investigator reports to City Attorney. The Civil Rights Investigator is the legal advisor of the Mayor, appointed by the Mayor, and responsible for defense of city departments and mayor).

City Attorney's Office (or equivalent) lends legal guidance, support, and/or authority to Offices of Civil Rights and Commissions based on judicial authority of the entity and capacity

Box 6. Legal Guidance & Authority

Representation at Public Hearings

Iowa City, IA: City Attorney represents Commission during public hearings, City Attorney is appointed by the City Council and works at the direction of the City Council.

Austin, TX: Office of the Auditor is independent from the Mayor and City Council; City Attorney reports to City Manager--Right to Sue and public hearing oversight from Attorney.

Subpoena Power

Duluth, MN: Commission has no subpoena power. The city attorney or a qualified attorneyat-law designated by the commission shall serve as legal counsel to assist the human rights officer.

South Bend, IN: The Department of Law may veto the issuance of a subpoena if such an issuance would be an abuse of the Commission's subpoena power.

Enforcement & Investigation Support

Dubuque, IA: Once the complaint is filed: forwarded to City
Attorney's office for an investigation. Probable cause: office works with the City attorney's office to negotiate a settlement to remedy what has occurred. If no settlement is reached, then the case may

Portland, OR: City
Attorney's Office
investigates and
enforces all
discrimination
complaints from
protected classes.

Fairfax County, VA: Legal counsel is provided to the Commission through the office of the County Attorney. Entity responsible for subpoenas, civil actions and awarding of damages via Attorney's Office.

proceed either to court or to a public hearing where the Human Rights Commissioners serve in a final decision-making capacity.

Fort Worth, TX: Human Relations
Commission and Housing handles
employment and housing. For
Public Accommodation cases:
Intake and investigation, pass
eligible cases to City Attorney's
Office.

Dallas, TX: Office of
Human Rights
manages the
complaint process and
final determination
sits with the City
Attorney's Office.

Minneapolis, MN: City
Attorney staff handles all
legal matters for the
commission, hearing
committees, review
committees and the
department of civil rights. A
legal department staff
attends public hearings at
the request of a hearing
committee/ examiner,
provides legal services in
the event of judicial review
or enforcement of
committee decisions.

Survey & Interview Findings: Authority

Decision-Making Authority Perception

Civil Rights Enforcement Directors: Authority in Decision-Making

Civil rights enforcement directors showed general agreement that their entities have sufficient authority in decision-making power. This was a similar trend across the three types of structures—with a majority either agreeing or strongly agreeing they had sufficient decision-making power. Stronger agreement was found among respondents located in independent offices civil rights only entities.

Table 9. Does the Civil Rights enforcement entity have sufficient authority of decision-making power to achieve its mandate?

Level of	1. INDEPENDENT CIVIL	2. INDEPENDENT CIVIL	3. COMBINED
agreement	RIGHTS ENTITIES:	RIGHTS ENTITIES:	
	COMPLETE	LIMITED	
Strongly Agree	33.3%	50.0%	20.0%

Agree	50.0%	25.0%	60.0%
Disagree		-	20.0%
Strongly Disagree	16.7%	25.0%	-
Don't Know	-	-	-

Environmental Scan Findings: Accountability

Traditional civil rights enforcement entities hold a primary responsibility to members of protected classes; in an expanding landscape of the mandate and responsibilities of civil rights enforcement entities, relationships and accountability to different stakeholder groups are shifting as well. The environmental scan showed variations in accountability mechanisms: these mechanisms included internal accountability structures such as regular progress reports and mechanisms for unbiased and neutral employee complaint processes. Accountability mechanisms are also aimed at accountability not only to members of protected classes but also to communities of color and those who are most impacted by potential systemic discrimination.

The findings below reflect publicly available data in municipal codes, town charters, and jurisdictional strategic plans. It does not necessarily reflect how mandatory or voluntary reporting mechanisms occur in practice. In many cases, municipal codes specify departmental or Commission annual reporting requirements to both the executive and the legislative, however, it does not specify the hierarchy of authority or whether the executive branch has final approval on all submitted reports and investigations.

Accountability

Overview

- Commissions serving larger populations often have dedicated internal divisions to Community relations
- New York City Community Relations Bureau provides public education about the Human Rights Law and helps cultivate understanding and respect among the City's many diverse communities through its borough-based Community Service Centers and numerous educational and outreach programs. Their main focus is employment and housing.
- Dedicated Commissions for community complaints against employees
- Dubuque Community-City Relations Committee (see below for details)

- Representation and quotas for community groups and identities on Commissions with varying degrees of specificity
- Youth/Student representation (Ex. Brookline, Tacoma, Portland)
- Representatives from all Commissions (Ex. Brookline, San Francisco, Women, Disability, Immigrant Affairs, etc.)
- Gender balance (Ex. Des Moines Human Rights Commission)
- LGTBQIA liaison and community representation (Ex. San Francisco Human Rights Commission)
- Elected Officials (Ex. Madison is the only jurisdiction to include a minimum of 1 Alderperson)
- Expertise in area of discrimination complaints (Ex. Boston Fair Housing Commission: 1 must be eligible in Boston to receive assisted housing, 1 CBO with expertise in fair housing, 1 w/ expertise in governmental civil rights, 1 involved in rental/sales of property)

Box 7. Commission Representation Example: City of Asheville

Asheville Human Relations Commission (HRCA): The HRCA will be composed of fifteen members, which should reflect the groups of individuals that the human relations program is intended to protect. City Council will endeavor to appoint city residents meeting the following criteria: 6 African Americans 2 Latinx individuals 2 members of the LGBTQ community 2 youth members, between the ages of 18 and 25 2 to 3 individuals who live in public housing 2 individuals with a disability 3 individuals who are recognized as community leaders.

Internal Accountability Mechanisms: Reporting

- Annual reporting requirements: Civil Rights Enforcement Director to City Council and/or Executive
- Albuquerque Staff Director of the Human Rights Board: Reporting: (I) Submit annually a written report of its activities and an evaluation of the effectiveness of this article to the City Council and Mayor with recommendations for changes. (J) Review and make recommendations to the Mayor, City Council, or Chief Administrative Officer regarding the City Affirmative Action Plan and Programs; city department, division, agency, and program affirmative action plans; and affirmative action guidelines for City contracts.
- Baltimore Community Relations Commission mandated to supply annual report to Mayor and City Council of its activities and recommendations for legislation as in the judgement of the Commission is necessary or desirable to aid it in carrying out its purposes.
- Seattle Human Rights Commission reports on a semi-annual basis to the Mayor and the City Council. The reports include an annual or semi-annual work plan, a briefing of the Commission's public involvement process for soliciting community and citizen input in framing their annual work plans, and updates on the work plans.

- Annual reporting requirements of Department Heads to Civil Rights Director, including reporting for the purposes of legislative recommendations
- Brookline, MA: Police Chief required to report. CDO services as Ombudsperson for town employees in discrimination complaints.
- San Francisco Human Rights Commission Policy Division generates regular reports based on a combination of testimony from public hearings and HRC's own independent research, investigations and analysis of issues relevant to human and civil rights. The Mayor, the Board of Supervisors, and Commissioners can make recommendations for reports. In addition, community members may file complaints with the HRC and request mediation and/or investigations.
- Louisville/Jefferson County Human Relations Commission is directed to make studies of biasrelated tensions in the Metro Government arising from bias-related crimes. The Louisville/Jefferson County Human Relations Commission shall report the findings of such studies semi-annually to the Metro Council and the Mayor.
- Buffalo: Fair Housing Officer prepares an annual report detailing the work performed, including a statistical analysis of the caseload, a summary of dispositions of complaints filed and/or referred to housing agencies, and recommendations regarding fair housing practices to the Mayor. Officer appointed by Mayor. Commission on Citizens' Rights and Community Relations of the City of Buffalo submits annually and as requested by the mayor or common council, a report on: (i) its activities; (ii) the state of community relations in the city; (iii) the state of equal opportunity and respect for cultural diversity within city government and in its services and programs; (iv) the state of the police department's initial and ongoing training programs in community relations and respect for citizens' rights and standards and procedures for investigating and acting upon complaints of police misconduct; and (v) significant issues that have arisen concerning any of the foregoing matters.
- Iowa City, IA: The Human Rights Commission makes recommendations to the City Council: further legislation concerning discrimination as it may deem necessary and desirable. Code outline of duties: Prepare and transmit to the city council from time to time, but not less often than once each year, reports describing the proceedings, investigations, hearings, decisions and other work performed by the commission. Make recommendations to the city council for such further legislation concerning discrimination as it may deem necessary and desirable.
- Alexandria Human Rights Commission: Establish, administer or review programs at the request of the city council or the city manager and make reports on these programs to the city council and city manager.

Accountability to Communities

Civil Rights Enforcement Entities

- Most common strategies are limited to outreach, educational opportunities, and trustbuilding, as well as monitoring of inter-group violence and tension external to government.
- Some jurisdictions certify community partners via the civil rights office or Equal
 Opportunities Commission to perform know-your-rights trainings and raise awareness about complaint processes.

Infrastructure for Community Outreach & Education

Outreach & Education

- Philadelphia Community Conflict Resolution Certificate Program: an initiative to train community members to resolve neighborhood disputes in their local communities. The intention of the project is to equip residents of Philadelphia with the tools they need to help resolve interpersonal conflicts in their neighborhoods before they escalate.
- NYC Community Resource Bureaus provides public education about the Human Rights Law and helps cultivate understanding and respect among the City's many diverse communities through its borough-based Community Service Centers and numerous educational and outreach programs.
- Philadelphia Civil Rights Rapid Response Team is an interdisciplinary group that includes civil rights leaders from city, state, and federal agencies, the School District, and advocacy groups that focus on responding to hate crimes, bias incidents, and violent acts that have bias potential. The Team also educates stakeholders about a range of topics, including law enforcement procedures for investigation, the rise of violent extremism and its impact on civil rights and hate crime, and agencies' protocols in responding to bias incidents.
- Washington D.C. Office of Human Rights: Trains Human Rights Liaisons from organizations providing direct services to (LEP/NEP) populations to identify and report language access violations their customers encounter; OHR also partners with Mayor's Offices on African, Asian Pacific Islander, and Latino Affairs as well as the DC Language Access Coalition to conduct "Know Your Rights" trainings.
- Dialogue & Community Conversation Spaces
- Des Moines Bridging the Gap is a project championed by the Mayor to have solutionsfocused discussion with community members. This ongoing, community-centered dialogue
 and strategy series is designed to involve city and state government, business leaders,
 service providers, and at-large community members in the development of collaborative,
 step-by-step solutions to address issues that are essential to a thriving city.

Infrastructure for Community Engagement & Accountability

- Mechanisms for Community Priority-Setting
- San Francisco Citizen Advisory Committees can bring issues for resolution directly to the HRC for consideration. The role of the advisory committees is to provide advice and assistance to the Commission by developing and examining ideas and issues within the jurisdiction of the Commission. The committees may also hold public hearings and make recommendations of positions for the Commission to take on legislation. New committee members are appointed every year for 1-year terms.
- San Antonio, TX: The city has embraced a partnership with SA2020, a non-governmental
 organization developed out of a community visioning process, which has helped the city to
 develop and track metrics, to both extend the local government's capacity and hold it
 accountable.

- Portland City Council adopted Public Portland: Involvement Principles in August 2010, and is committed to applying them in planning, providing services and decision-making. The City recognizes that Title VI has been implemented to ensure decision-making processes are designed to prevent disproportionate adverse human health and environmental effects, including social and economic effects, as a result of any City project or activity on minority and low-income populations. The City has developed extensive resources and best practices to ensure that the public is meaningfully involved in the decisions it makes. Such involvement is critical to the implementation of the Title VI program.
- Temporary/Ad Hoc Task Forces on Specific Issues
- St. Paul, MN: City Council and the Mayor request that the Human Rights and Equal Economic Opportunity Commission convene a task force appointed by the Mayor and approved by the Council that is representative of the city's businesses of all sizes and types, employees, organized labor, advocacy organizations and residents to engage the broader community in a conversation around the specifics of requiring employers to offer earned sick and safe time benefits to their employees.
- Community Workforce Agreement Task Force Resolution 40124, passed by the Tacoma City Council on October 2, 2018, directed the City Manager to establish a Task Force to examine and make recommendations regarding a Priority Hiring Ordinance (PHO) and a Community Workforce Agreement (CWA). This Task Force will study different PHOs and CWAs implemented around the country in cities like San Francisco, Seattle, New York, Cleveland, and Los Angeles. The Resolution also directs the Task Force to consider a disparity study, commissioned by the City, that details the differences in hiring practices for City construction projects. After consideration of these topics, the Task Force will issue its recommendations to the City Council.
- King County Immigrant and Refugee Task Force to expand access to opportunities and voices in government. The Task Force was charged with making recommendations on the creation of a King County Immigrant and Refugee Commission, including, but not limited to, recommendations on the commission's membership, mission and scope of duties (see Ordinance 18085): held more than 20 community meetings, collecting feedback and input of over 500 members of immigrant and refugee communities.
- Community-Oversight Bodies
- Dubuque: Community-City Relations Committee (CCRC) provides a forum for citizen input into the development of City Department policies and procedures, assuring that they continue to be free from racial or other prejudices. It also provides an arena where citizens can bring their complaints when they believe a City Department has violated their civil rights. Committee was formed in October 2015 as an addendum to an MOU between the City of Dubuque and Dubuque Branch NAACP. The panel is composed of nine members: a City government representative and three community members appointed by the City Manager; a Dubuque Human Rights Commissioner appointed by the Commission; two minority representatives of the community appointed by the Dubuque Branch NAACP; and two staff designated by the Department Manager of the Department against whom a complaint is filed.

- Minneapolis Racial Equity Community Advisory Committee (2017): serves as an advisory board to the City Council, Mayor, and City Departments on City policies, practices, budget, and other matters that it determines to be appropriate, related to addressing racism and racial inequities and promoting racial justice and racial equity in the City enterprise and in the City as a whole. It serves as an advisory body to the Racial Equity Steering Committee on the creation and implementation of the Racial Equity Action Plan and provides an annual evaluation report to the community on the City's progress addressing racial inequities and closing racial disparities.
- lowa City: City Manager's Community Roundtable was created by the City Manager; the Roundtable meets bi-monthly to discuss City efforts at eliminating racial disparities. The Roundtable is made up of chairs and directors of community organizations and City staff.
- King County Juvenile Justice Equity Steering Committee consists of community members, youth, local leaders, law enforcement, school district superintendents, faith-based representatives, judges, prosecutor and public defense, and is tasked with identifying shortand long-term actions to end disproportionality in the juvenile justice system.

Box 8. Institutionalizing Community Participation in Commissions: City of Minneapolis

Minneapolis has developed a permanent advisory body in accordance with the City's Open Appointment process in furtherance of Minneapolis Code of Ordinance 14.180, which enables the City to "create and support organizations that enhance community engagement in the City's decision-making process." The City developed the Community Boards Leadership Institute Model to support and train individuals and communities of color to serve on over 50 voluntary boards and commissions across the city to further a city-wide equity agenda.

Accountability to Employees

- Employee Complaint Processes
- San Francisco, CA employee complaints can be processed through Human Resources but can be appealed independently through the Civil Service Commission.
- Washington D.C. government employees alleging employment discrimination must first consult an Equal Employment Opportunity counselor in any agency before processing a complaint with the OHR.
- Investigations of other city agencies
- Dubuque, IA: Complaints against a City department are filed with the Iowa Civil Rights
 Commission, as the department does not investigate cases against other city agencies.
- Alexandria, VA: City Attorney does not have the authorization to represent the city or departments, and complaints go to hearing with a private attorney.

- Pittsburgh Office of Municipal Investigations: Investigates and helps resolve complaints about Public Safety Department employees, including Police, Fire, Bureau of Building Inspection, Emergency Medical Services, and all other City employees. OMI acts solely as a fact-finder and does not make disciplinary decisions or recommendations. By remaining independent from any Public Safety Department bureau, and by staying removed from the disciplinary process, OMI ensures citizens and employees a fair, thorough investigation.
- ? Workforce Empowerment
- Diverse and Empowered Employees of Portland assists the City in creating and enhancing a
 work environment that is inclusive and supportive of the City's diverse workforce. The
 program is comprised of 10+ Affinity Groups and mentorship programs.
- King County Workforce Equity: Bridge Academy program helps employees develop leadership skills, learn more about County systems and operations, and advance their careers.

Survey & Interview Findings: Accountability

Accountability to Community

Civil Rights Director Perceptions of Accountability

Civil Rights Enforcement Entity has taken steps to ensure accessibility to protected classes

Civil Rights Directors working in Type 1+2 jurisdictions (independent civil rights entities) showed the strongest agreement that steps had been taken in their offices to ensure accessibility among protected communities. Type 1+2 jurisdictions also had greater agreement that they provide effective community outreach and education than other offices (See Table 13).

Table 13. "provides community outreach and education so that community members, especially those from protected classes know about their civil rights and how they are protected"

Level of agreement	1. INDEPENDENT CIVIL RIGHTS ENTITIES: COMPLETE	2. INDEPENDENT CIVIL RIGHTS ENTITIES: LIMITED	3. COMBINED
Strongly Agree	66.6%	-	20.0%

Agree	33.3%		60.0%
Disagree	-	100.0%	20.0%
Strongly Disagree		-	-
Don't Know	-	-	-

Civil Rights Enforcement Entity Has Institutionalized Community Engagement in its Decision-Making & Planning Structures

Responses collected from civil rights enforcement directors reflect that directors in independent offices have developed a greater capacity to integrate community engagement in their decision-making and planning as compared to other structural types (See Table 14)

Table 14. In your opinion, your office/department has institutionalized community engagement in its decision-making and planning structures.

	INDEPENDENT CIVIL RIGHTS ENTITY: COMPLETE	INDEPENDENT CIVIL RIGHTS ENTITY: LIMITED	COMBINED
Strongly Agree	16.7%	-	40.0%
Agree	66.7%	-	40.0%
Disagree	-	66.7%	-
Strongly Disagree	-	-	20.0%
Don't Know	16.7%	33.3%	-

Autonomy and independence were more frequently noted among survey respondents and interviewees if they belonged to an independent civil rights only office (Types 1+2)

Summary of Findings

Analysis of an environmental scan of 60 jurisdictions nation-wide revealed three major structural types, which were further reflected in our survey data and interview results. The three structures indicate where civil rights activities are housed within the given government.

The typology of structure served as a helpful framework to evaluate forms of government, proximity to power, authority to implement initiatives, and characteristics of policy-making processes. The analysis revealed several key findings. They are organized as follows:

- **?** Variation in Civil Rights
- Organizational Structure as Key Explanatory Factor
- **?** Characteristics Commons Across Structures
- **Emergent Patterns Across Structure**
- Important Factors Beyond Structures

Variation in Civil Rights Approaches

Results revealed approaches to civil rights work vary greatly. This variation manifested across multiple areas of inquiry including roles, responsibilities, authority, reporting structure, functions, among others. The variation lends itself also to variation in approaches in investigations, enforcement, compliance, appeals, and policy-making. This variation was apparent not only in the environmental scan but also in responses received through surveys and interviews with Director-level staff. While form of government (i.e. strong mayor) does play a role in many of the emerging patterns related to reporting structure, appointment process, and policy-making chain of command, there were also similarities across different forms of government and potential opportunities to explore.

Characteristics of Structures

Types 1+2: Jurisdictions that house civil rights enforcement as an independent entity with varying authority

- Due to the legal threshold lens applied to civil rights enforcement and investigations, racial equity initiatives housed independently from civil rights have an opportunity to lead with race but continue to require collaboration and negotiation with civil rights entities and legal departments around legal limits. This very often depends on leadership championing an equity agenda, and the "person power" of a Director.
- A reported lack of competing priorities between enforcement mandates and advancing racial equity, and a greater ability to lead with race.
- Clear division of purpose and services, with separate entity perceived as enforcement and/or punitive.

 Dedicated investigators and legal professionals with time to focus on timely processing of discrimination complaints (civil rights offices) and separate equity staff with differentiated skills in racial equity tools, training etc.

Type 3: Combined jurisdictions that have civil rights and another department or office housed together

- Predominantly centered around traditional civil rights case work.
- Leveraging quasi-judicial authority of civil rights commission to initiate independent investigations and address systemic patterns within the workplace and community.

Emerging Patterns Across Structures

For the most part, different strengths, challenges, and opportunities emerged across all types, and analysis shows that the effectiveness and degree of authority and accountability of civil rights enforcement is dependent on a number of other institutional and cultural factors beyond structure.

Civil rights respondents were more likely to mention themes of authority and autonomy when discussing the strengths in their structure, and the importance of having the capacity and focus necessary to be effective in their body of work. Civil rights enforcement directors showed general agreement that their entities have sufficient authority in decision-making power. This was a similar trend across the three types of structures—with a majority either agreeing or strongly agreeing they had sufficient decision-making power. *Stronger* agreement was found among respondents located in separated offices civil rights only entities.

<u>Important Factors Beyond Structure</u>

Culture and Leadership

- The desire for increased leadership buy-in, including support from executives was a common theme across both survey and interview respondents, especially for directors who have experienced administration transitions with less supportive officials.
- A common theme of all interviewees was the importance of one-on-one relationships and the "person power" required to advance any kind of institutional or enterprise-wide change.

Capacity and Resources

- Concerns with effectiveness and capacity were found across both survey and interview respondents: the number one concern raised among civil rights directors across all typologies was budget and staffing.
- Capacity is not just increasing staff and resources, but also having the right people to do the work (i.e. attorneys perform very different roles and have different strengths than social workers or intake professionals).
- Interview respondents shared varying perceptions of their contracts with federal agencies, some noting the vital nature of funding and others noting the limited funding available for non-enforcement related activities.

 Interview respondents from jurisdictions with combined entities (Type 3) were more likely to note the implications of HUD & FEPA contracts and the prioritization of quantity of cases closed, push towards monetary settlement, and lack of focus on more systemic outcomes.

Impact & Community Accountability

 Effectiveness and impact on communities depends on critical staff and their ability to build and sustain relationships across departments and managerial levels. Some respondents also noted the importance of collaboration not only institutionally, but also collaboration with community.

Opportunities

Increasing Authority

- Investigative priority-setting should be open to Executive, Legislative, community forums or entities, and Commissions based on observation of patterns of discrimination, oppression, and/or inequitable outcomes.
- All reports related to city agency activity or impacts should pass through independent body or Commission (rather than via legislative or executive branch prior to release of findings).
- Examples of strong elements of investigatory and enforcement authority found in jurisdictions: Dismissal of a complaint prior to investigation, a finding of reasonable cause, attempt to conciliate, or referral of a complaint directly to the Commission, issuance cease and desist orders, imposition of monetary civil penalties, and Commission authority to apply secondary review of all cases regardless of Office and/or Director findings.

Strengthening Accountability

- Require in-depth training of Commissioners and investigators on applying civil rights law and racial equity/bias training, especially if Commissioners are volunteers with no specific area of legal expertise.
- Include representation quotas in city charter outline of Commissions to reflect need for civil rights/legal background and individuals bringing a racial equity lens to the work.

Countering Political Influence and Bias in Strong Executive

Governments

- Establish a balance of power in personnel decisions of senior leadership split between
 Executive and Commission, with Legislative branch breaking ties/disagreement.
- Establish performance review process of director coordinated an independent, nonelected Commission, separate from nominating/reporting body (i.e. Executive).

- Consider Director-Commission reporting relationships that create a buffer between enforcement entity and Executive.
- Consider implications of the role of City Attorney/Legal Department in investigating complaints against city employees or other city departments.
- Develop a mixed appointment process allowing both the executive and legislative branches appoint a certain % of the Commissioners.

Conclusion

Across all jurisdictions, a large variation in structure emerged, notably as it relates to strong mayoral jurisdictions and council-manager jurisdictions. Organizational structure has an implication on enforcement and policy making, but the varying structures and reporting relationships all come with different strengths and challenges.

This suggests there is an opportunity for Austin to consider the structures and strategies of jurisdictions with different civil rights-enforcement structures. Success in protecting civil rights depends largely upon clarity and perception of purpose and vision, staff ability to leverage relationships, proximity to various positions of power, and resources that reflect racial equity as a priority.

Related Appendices

SOCR Typologies Sheet

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