

City of Seattle
Office of City Auditor



REVIEW OF SEATTLE'S CIVIL RIGHTS ENFORCEMENT AND OUTREACH (ISSUED 11/20/13)

City Auditor: David Jones

Auditor in Charge: Virginia Garcia

April 16, 2014

AUDIT OBJECTIVES

■ Why We Did This Audit:

- Requested by Councilmembers Harrell, Clark and O'Brien

■ Four Main Objectives:

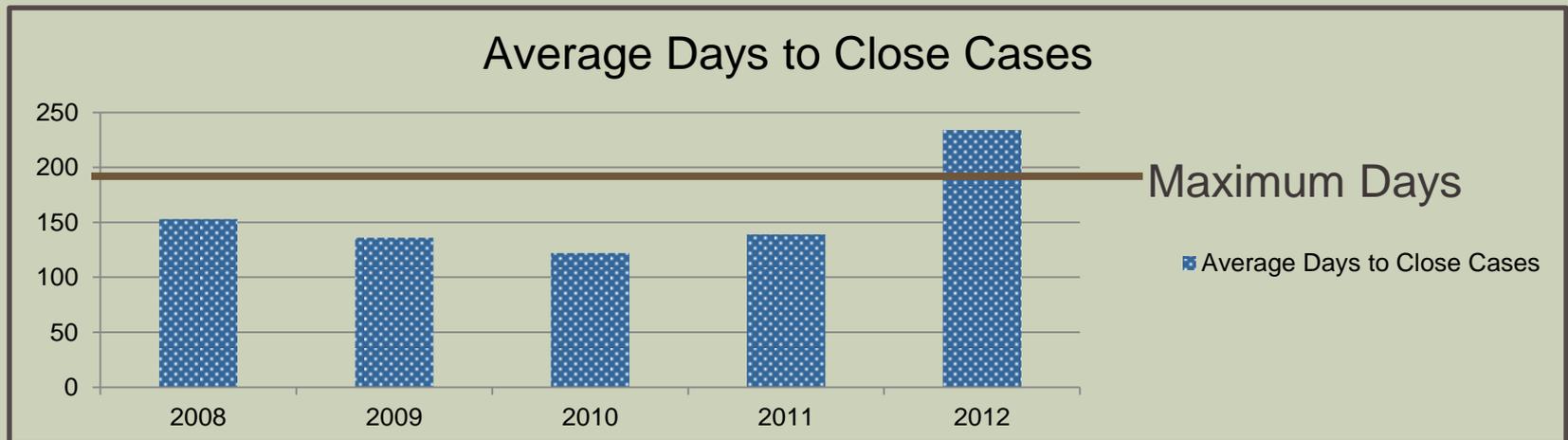
1. Is SOCR Enforcement Staffing Adequate?
2. Can the Enforcement Process Be Streamlined?
3. Can SOCR's Objectivity and Impartiality Be Improved?
4. Can Outreach to Businesses Be Improved?

RECOMMENDATIONS

- **We made 19 recommendations in three areas:**
 - 1) Suggestions to streamline SOCR's enforcement process
 - 2) Options to improve perceptions of SOCR's objectivity and impartiality
 - 3) An outreach strategy that increases the emphasis on prevention and inclusion
- **SOCR Reported Significant Progress in Implementing Our Recommendations**

1) IS SOCR ENFORCEMENT STAFFING ADEQUATE?

- SOCR's enforcement program is highly regarded nationally and locally
- SOCR met legal requirements
- SOCR met case processing goals from 2008-2011; not met in 2012

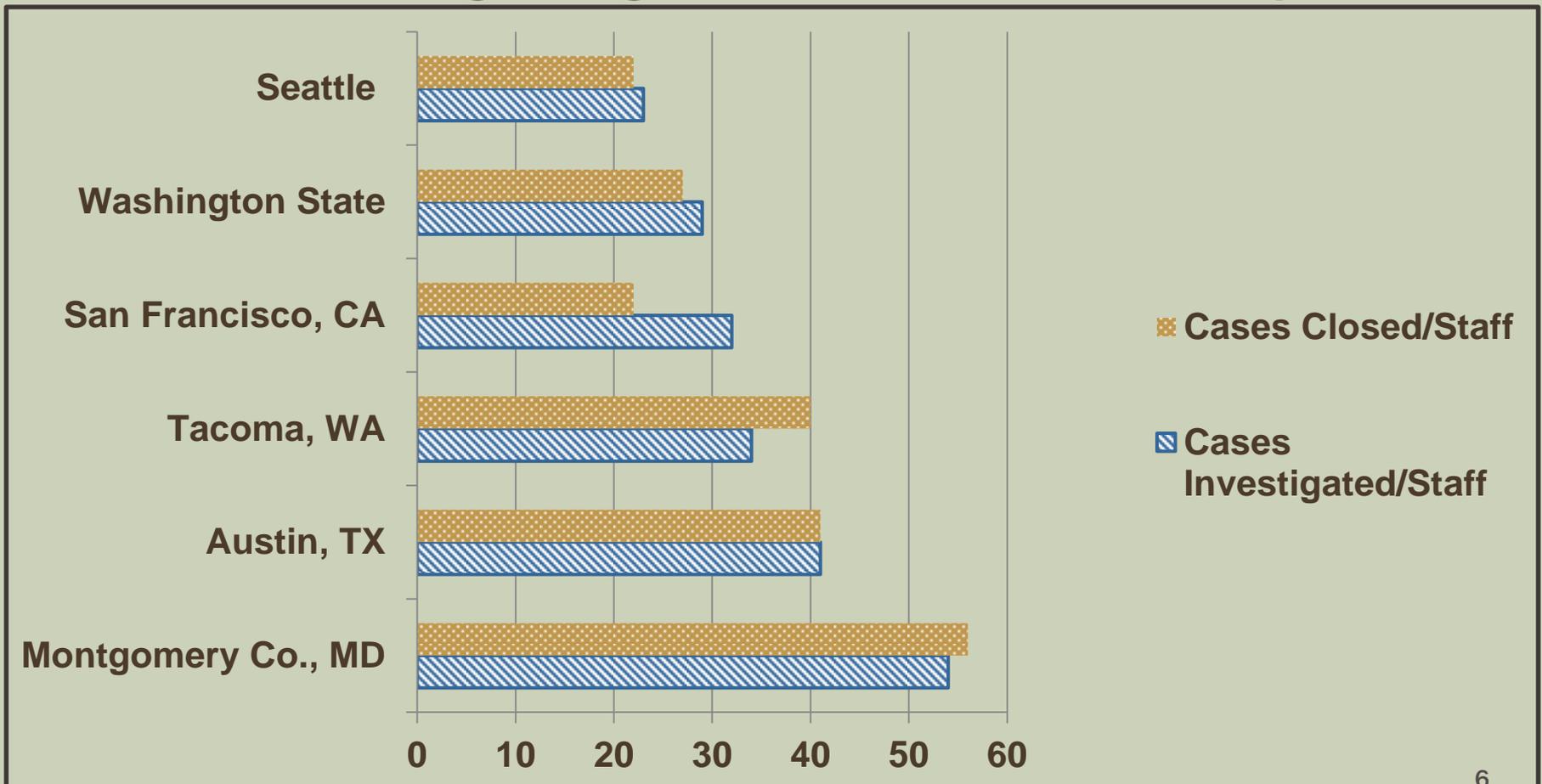


1) IS SOCR STAFFING ADEQUATE? – CONT.

- 2012 Case Processing was affected by:
 - 2011 staff reductions,
 - Implementation of the PSST Ordinance, and
 - Housing testing
- Compared to other jurisdictions SOCR enforcement is well staffed

2) CAN SOCR'S ENFORCEMENT PROCESS BE STREAMLINED?

2012 Human Rights Agencies Jurisdictional Comparison



2) CAN SOCR'S ENFORCEMENT PROCESS BE STREAMLINED? – CONT.

Increase use of automation

- To address inconsistencies found in file documentation
- To help determine which cases meet prima-facie during intake

2) CAN SOCR'S ENFORCEMENT PROCESS BE STREAMLINED? – CONT.

Consider options for streamlining appeals process

- Establish a SOCR Director's reconsideration process
- Have SHRC Chair and SOCR Director jointly decide which appeals should be heard by Appeals Panel
- Increase Appeals Panel membership continuity and provide them with HUD and EEOC sponsored training

3) CAN SOCR'S OBJECTIVITY AND IMPARTIALITY BE IMPROVED?

- Avoid performance measures that appear to be inappropriately in SOCR's self-interest
- Isolate enforcement staff from civil rights policy development and advocacy
- Use automation to standardize the investigative process

3) CAN SOCR'S OBJECTIVITY AND IMPARTIALITY BE IMPROVED? - CONT.

- Consider Changes to Seattle Human Rights Commission (SHRC)
 - Change SHRC and/or Appeals Panel membership to ensure broader representation
 - Require Appeals Panel commissioners to refrain from advocacy activities or create an appeals panel separate from SHRC
 - Have only the Hearing Examiner adjudicate discrimination charges

4) CAN OUTREACH TO BUSINESSES BE IMPROVED?

- Outreach Strategy: Increase Emphasis on Prevention and Include Stakeholders
 - SOCR's mission statement should invite stakeholders to help prevent discrimination
 - SOCR's outreach efforts should include potential respondents and focus on prevention