

# Pinellas County Office of Human Rights Program Review April 2026



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## Executive Summary

Pinellas County engaged Local Government Solutions (LGS) in January 2026 to provide a program overview of the Office of Human Rights (OHR). The primary focus of this review included:

- Legislative review of the authority for each program
- Identification of internal and external customers
- Review of revenues, expenditures, and staffing associated with each program
- Documentation of performance metrics
- Analysis of potential overlap between the Office and other County departments
- Peer comparison of current programs
- Impact analysis if a program were to be:
  - Moved to another department
  - Subject to a service level reduction, or
  - Eliminated

Local Government Solutions was not tasked with making recommendations regarding structural or operational changes to the Office; therefore, this report contains very few recommendations. The limited recommendations relate only to opportunities that may enhance the County's ability to offset program costs through revenue recapture and to monitor shifting federal guidance for the types of programs provided by the Office. These items are presented as questions or areas for further consideration, as the County may already be pursuing some of these options. They include:

- Recapturing all allowable indirect cost reimbursements from grants.
  - Additional amount undetermined at this time
- Consider capturing the cost of providing services to constitutional offices through the County's cost allocation plan
  - Estimated at \$35,522.
- Investigate whether the County can charge businesses found in violation of the Wage Theft Ordinance for more than just postage.
  - Estimates depend on time spent on cases won.
- Continuing to monitor shifting federal guidance for related programs

While none of these options would fully fund current human rights programs, collectively they may help marginally reduce the cost borne by the General Fund, as most programs are currently supported through ad valorem revenues.

It is important to note that Local Government Solutions associates are not attorneys and do not provide legal advice. Any discussion of legal requirements in this report is based on a general review of publicly available federal, state, and local statutes and regulations. We do not conduct legal analysis, review case law, or provide interpretations of law. To the extent that

questions arise regarding the legal application or implications of specific statutes, Pinellas County is encouraged to consult with its legal counsel.

## Summary of Programmatic Activity

The Office of Human Rights has five categories of programming with 10 programs within these categories. Each program may include several individual activities used to achieve its goals. This report breaks down the programmatic activity in the following way.

Figure 1. *Office of Human Rights Program Chart*

| Primary OHR Programs                    |   |   |   |                                      |
|---|---|---|---|--------------------------------------|
| Federal Partnership Programs            | Disability Access, Accommodation & Advisory Services  | Title VI Compliance   | Grant & Reporting Compliance                | Local & Regulatory Compliance        |
| Fair Housing Enforcement (FHAP)         | ADA Coordinator, Transition Plan Administration, Accommodation Intake, Interpretation WebForms, & ASL | Title VI Compliance, Limited English Proficiency (LEP) Plan, & LanguageLine | Equal Employment Opportunity Plan Reporting | Refueling Assistance                 |
| Fair Employment Practices Agency (FEPA) |   |   |   | Wage Theft and Recovery Program      |
|   | Pinellas County Council for Persons with Disabilities   |   | Federal Grant & Civil Rights Compliance     | Harassment Training & Investigations |

Of the 10 primary programs, half are required by either the state or federal government, or both. “Required” in this instance means that the program is either mandated by law or that the regulatory risk associated with not providing the program significantly outweighs the cost of providing it (in some instances, the repercussions could be in the millions of dollars). These programs include:

- ADA Coordinator, Transition Plan, Accommodation, Interpretation WebForms, and Reasonable Accommodation Intake (disability access services), & ASL services.
- Title VI compliance including Limited English Proficiency (LEP)
- Federal grant and civil rights compliance
- Harassment training and investigations
- Equal opportunity employment plan reporting

Together, these programs account for approximately 39.5% of the total office budget (\$592,780 in the FY 26 budget) and approximately four full-time equivalent (FTE) positions of staff effort. However, this work is spread amongst almost all positions within the Office. The

remaining five programs are required only by County ordinance or policy and account for 60.5% of the Office budget (\$907,930) and an equivalent staff effort of about 6 FTEs. Table 1 provides more detailed information on this breakdown. Appendix A provides even more detail.

*Table 1. Program Expenditure and Revenue Breakdown (FY 26 Budget)*

| Program  | Required | Revenue          | Expenditure      | FTEs         |
|--|----------|------------------|------------------|--------------|
| ADA Coordinator, Transition Plan, Accommodation, Interpretation WebForms, and Reasonable Accommodation Intake, & ASL | ✓        | \$0              | \$120,057        | 0.80         |
| Title VI Nondiscrimination Compliance including: LanguageLine, & Limited English Proficiency (LEP) Plan <sup>1</sup> | ✓        | \$0              | \$90,043         | 0.60         |
| Federal Grant & Civil Rights Compliance  | ✓        | \$0              | \$90,043         | 0.60         |
| Harassment Training & Investigations   | ✓        | \$0              | \$172,582        | 1.15         |
| Equal Employment Opportunity Plan Reporting  | ✓        | \$0              | \$120,057        | 0.80         |
| Pinellas County Council for Persons with Disabilities  | –        | \$0              | \$30,014         | 0.20         |
| Fair Employment Practices Agency (FEPA)  | –        | \$25,000         | \$270,128        | 1.80         |
| Fair Housing Enforcement (FHAP)  | –        | \$138,000        | \$420,199        | 2.80         |
| Refueling Assistance   | –        | \$0              | \$15,007         | 0.10         |
| Wage Theft and Recovery Program  | –        | \$0              | \$172,582        | 1.15         |
| <b>Total</b>   |          | <b>\$175,000</b> | <b>\$1,50070</b> | <b>10.00</b> |

*Note.* Required denotes mandated by either federal, state, both, or repercussions of not performing program are likely financially severe. “✓” = Required, “–” = Not Required. FTE = Full-Time Equivalent.  
<sup>1</sup>While providing services is mandated, the method is not.

The estimates presented above reflect the best available approximation of expenditures and workload for each program. Costs and time are allocated based on estimated staff time provided by the Office. FTEs represent the cumulative time spent across staff throughout the year, not individual positions. As a result, program-level reductions may not yield savings equivalent to the expenditures or FTEs shown.

While discretionary programs are established by County ordinance or policy rather than federal or state mandate, they reflect policy choices adopted by the BOCC. Any modification or

elimination of these programs would therefore be a policy decision of the Board and could have significant impacts on associated populations in Pinellas County.

### Program Peer Comparison

During this project, Local Government Solutions made extensive efforts to obtain information necessary to provide meaningful peer comparisons. These efforts included:

- Obtaining peer contact information from Pinellas County
- Contacting peer organizations by phone
- Emailing peer organizations
- Reaching out to professional colleagues within peer organizations
- Reviewing publicly available peer documents and websites, and
- Submitting formal public records requests when information could not be obtained through other means.

Despite these efforts, some peer jurisdictions did not respond to requests or were unable to provide the requested information. As a result, comparable data was not available in all cases. The information that was successfully obtained through these efforts is summarized in the remainder of this section.

Most of the programs provided by the Office are provided by the other six peer counties surveyed for this study; however, there are some notable exceptions. Table 2 provides a breakdown of these differences, with additional detail included in Appendix B.

Table 2. *Program Peer Comparison*

| Program  | Broward | Hillsborough | Miami-Dade | Palm Beach | Pasco | Sarasota |
|--|---------|--------------|------------|------------|-------|----------|
| ADA Coordinator, Transition Plan, Accommodation, Interpretation WebForms, Reasonable Accommodation Intake, and ASL | ✓       | ✓            | ✓          | ✓          | ✓     | ✓        |
| Title VI Nondiscrimination Compliance Including: LanguageLine & Limited English Proficiency (LEP) Plan             | ✓       | ✓            | ✓          | ✓          | ✓     | ✓        |
| Federal Grant & Civil Rights Compliance  | ✓       | ✓            | ✓          | ✓          | ✓     | ✓        |
| Harassment Training & Investigations   | ✓       | ✓            | ✓          | ✓          | ✓     | ✓        |
| Equal Employment Opportunity Plan Reporting  | ✓       | ✓            | ✓          | ✓          | ✓     | ✓        |
| Pinellas County Council for Persons with Disabilities  | ✓       | ✓            | ✓          | -          | -     | ✓        |

| Program                                 | Broward        | Hillsborough   | Miami-Dade     | Palm Beach     | Pasco | Sarasota |
|---|----------------|----------------|----------------|----------------|-------|----------|
| Fair Employment Practices Agency (FEPA) | – <sup>2</sup> | √ <sup>2</sup> | √ <sup>2</sup> | √ <sup>2</sup> | –     | –        |
| Fair Housing Enforcement (FHAP)         | √ <sup>1</sup> | – <sup>1</sup> | – <sup>1</sup> | √ <sup>1</sup> | –     | –        |
| Refueling Assistance                    | √              | √              | √              | √              | √     | –        |
| Wage Theft and Recovery Program         | √              | √              | √              | √              | –     | –        |

Note. “√” = provides program. “–” = does not provide program.

<sup>1</sup>Provides a local program for housing enforcement.

<sup>2</sup>Provides a local program covering employees for employers of between 5 and 14 employees.

As shown above, FEPA and FHAP programs are the least commonly provided among peer counties as they are optional federal enforcement programs. While Pinellas County has optioned to partner with the federal government to assist in these programs, not all peers have. Some lean on the State and Federal governments for enforcement of the federal law. As identified in Table 2, four of the peers provide local programs, which provide protections over and above federal protections for housing and employment. As expected, all programs identified as “Required” are provided by every peer jurisdiction.

### **Funding Mechanisms**

In all peer counties surveyed, the primary funding source for similar programs was the General Fund. However, as in Pinellas County, a portion of the funding for both FEPA and FHAP programs comes from federal grants or contracts associated with those functions. Peer jurisdictions reported that federal funding does not fully cover the cost of administering these programs. This finding is consistent with a report by the Pinellas County Office of Inspector General, which indicated that the Equal Employment Opportunity Commission does not fully fund the FEPA program. Appendix C provides a comparison of high-level funding sources by program across all peer counties.

### **Overall Impacts**

The primary purpose of this report is to evaluate the impacts of program reorganization, reduction, or elimination on the County and its customers. While a full assessment is sometimes limited by available information, this report provides the best available estimates of programmatic impacts. Table 3 presents a high-level summary of the impacts associated with program elimination. For additional detail on the analysis supporting these findings, refer to the corresponding sections of this report.

Table 3. Summary of Program Elimination Impact

| Program                                  | Required | Financial Impact   | Customer Impact  | Regulatory Impact  |
|--|----------|--|--|--|
| ADA Coordinator & Accessibility Services | ✓        | While eliminating these programs may save about <b>\$120,000</b> in operations and <b>0.80 FTEs</b> worth of time, the County could face <b>increased risk to federal funding</b> tied to Title VI compliance of about <b>\$160 million</b> , in addition to potential legal costs | <b>Disabled</b> visitors, residents, and businesses who rely on these services would be impacted the hardest as well as <b>internal departments</b> who rely on OHR for assistance in these matters.   | <b>Required under ADA, Section 504</b> , and related regulations.  |
| Title VI / LEP / Language Access         | ✓        | While eliminating these programs may save about <b>\$90,000</b> in operations and <b>0.60 FTEs</b> worth of time, the County could face <b>increased risk to federal funding</b> tied to Title VI compliance of about <b>\$160 million</b> , in addition to potential legal costs. | <b>Reduced access for LEP individuals</b> and <b>increased risk of discrimination complaints</b> by staff and customers, with <b>limited ability to resolve issues</b> internally.   | <b>Required under Title VI</b> of the Civil Rights Act and as a <b>condition of receiving federal funding</b> .  |
| Grant Civil Rights Compliance            | ✓        | While eliminating these programs may save about <b>\$90,000</b> in operations and <b>0.60 FTEs</b> worth of time, the County could face <b>increased risk to federal funding</b> tied to compliance of about <b>\$160 million</b> , in addition to potential legal costs.          | <b>Departments would lack support in meeting grant and civil rights requirements</b> and compliance.   | <b>Required under federal grant regulations</b> (e.g., <b>2 CFR Part 200</b> ).  |
| Harassment Training & Investigations     | ✓        | While eliminating this program may save about <b>\$173,000</b> in operations and <b>1.15 FTEs worth of time</b> , the County could face <b>increased exposure to litigation</b> , settlements, and outside counsel costs.  | <b>Employees would lose internal reporting and resolution mechanisms</b> , relying instead on external agencies such as the EEOC with <b>longer timelines</b> . This may increase unresolved issues and workplace risk without ongoing training. | <b>Increased compliance risk under federal and state employment laws, including Title VII</b> . Eliminating the program may reduce the County’s ability to demonstrate reasonable prevention and response efforts, increasing exposure to liability. |
| EEO Reporting                            | ✓        | While eliminating this program may save about <b>\$120,000</b> in operations and <b>0.80 FTEs</b> worth of time, the County would <b>risk losing</b>   | If grant funding is lost, broad impacts will be felt within <b>justice system partners</b> and grant-supported services (i.e.,   | <b>Required to maintain eligibility for DOJ grants</b> ; subject to EEOC reporting requirements.   |

| Program                               | Required | Financial Impact   | Customer Impact  | Regulatory Impact  |
|---------------------------------------|----------|--|--|--|
|                                       |          | approximately \$3.2M in DOJ grant funding.   | courts, sheriff, victims, etc.).   |  |
| Council for Persons with Disabilities | –        | Eliminating this program may save approximately <b>\$30,014 and 0.20 FTEs worth of time</b> ; however, this would result in minimal direct operational savings, as the effort does not represent a full-time position. | <b>Reduced advisory input from residents with disabilities</b> may limit the County’s ability to proactively identify accessibility needs and improve services.  | <b>Not required</b> ; however elimination would require amendment to the County ordinance.   |
| Fair Employment Practices (FEPA)      | –        | Up to <b>\$245,000 (net) and 1.8 FTE’s</b> , with reductions based on other programs   | <b>Employees</b> working in Pinellas County for <b>employers who have between 5 and 14 employees</b> will no longer have an alternative to legal action. Those in larger companies would need to <b>file complaints through federal or state agencies, increasing timelines</b> and reducing local accessibility for resolution. | <b>Not required</b> . Would lead to <b>loss of program funding (about \$25,000)</b> . <b>Individuals must still file a charge with the EEOC or a state agency</b> and receive a right-to-sue notice prior to litigation. Would limit ability to provide local employment discrimination enforcement covering employers with 5 to 14 employees. |
| Fair Housing (FHAP)                   | –        | Up to <b>\$270,000 (net) and 2.8 FTE’s</b> , with reductions based on other programs   | <b>Reduced access</b> to timely, local housing discrimination investigation and resolution, particularly for <b>vulnerable populations</b> . Residents <b>would need to rely on federal processes with longer timelines</b> , potentially impacting housing stability and access to workforce housing.                           | Not required. Elimination would result in the <b>loss of associated HUD funding (about \$150,000)</b> and would <b>shift enforcement responsibility to federal or State agencies</b> and limit ability to provide local fair housing enforcement.  |

| Program              | Required | Financial Impact  | Customer Impact   | Regulatory Impact  |
|----------------------|----------|---|---|--|
| Refueling Assistance | –        | Eliminating this program may save approximately <b>\$15,007 and 0.10 FTEs</b> worth of time. Actual savings would be minimal as the effort does not represent a full-time position and there is currently no significant work in this area. | <b>Individuals with disabilities</b> would need to <b>pursue complaints through state or federal channels, increasing timelines.</b> However, both the state and Pinellas County indicate they have not seen any complaints based on this ordinance/law in the recent past. | <b>Required only by local ordinance. Stations still must abide by state and federal regulations</b> which are slightly less stringent than the County ordinance.   |
| Wage Theft Program   | –        | Eliminating this program may save about <b>\$173,000</b> in net costs and approximately <b>1.15 FTEs</b> worth of time.   | <b>Reduced access</b> to a timely, local <b>remedy for low-wage workers. Residents would need to rely on courts or federal agencies with longer timelines and higher costs,</b> creating barriers for those least able to navigate the process.                             | <b>Not required;</b> however, elimination would <b>remove a locally established enforcement mechanism,</b> shifting complaints to courts or external agencies and reducing the County’s ability to address wage theft proactively. |

The potential savings presented above are based on the best information available at the time of analysis. Because the Office and the County only separate FHAP and other Human Rights programs at the budget level, all estimates reflect the Office’s current allocation of staff time across functions. Workforce capacity is shared among approximately 10 FTEs supporting all 10 programs, and there is not a one-to-one relationship between staff and programs. As a result, eliminating a single program may not yield the full estimated savings, as staff may still be needed to support remaining programs.

## Report Highlights

Overall, the analysis shows that Office administers a mix of federally required compliance functions, federal partnership programs, and locally adopted ordinances. Some programs exist to meet federal civil rights and grant compliance requirements, while others reflect policy choices by the Board of County Commissioners to provide additional services or protections for residents.

The potential impacts of reducing, moving, or eliminating these programs vary significantly. In some cases, the County would face substantial regulatory or financial risk if

programs were discontinued. In other instances, the primary impacts would relate to service levels, customer access, or policy objectives rather than legal requirements.

The remainder of this report provides detailed analysis of each program, including the legal authority for the program, staffing and budget considerations, peer comparisons, and the potential impacts associated with program movement, reduction, or elimination. This information is intended to assist the County in understanding the role each program plays within the broader civil rights and compliance framework and to support future policy discussions regarding service levels and organizational structure.

## Pinellas County Office of Human Rights (OHR)

### History, Governance, and Current Role of OHR

#### *Origins and Legal Foundation*

The OHR traces its origins to the County's early efforts to ensure equal employment opportunity within local government. In 1977, the Board of County Commissioners (BOCC) adopted Ordinance 77-23 establishing an Affirmative Action Office and an Affirmative Action Committee to address equal employment practices within County operations and among constitutional officers. This initial structure reflected a focus on internal workforce equity and compliance with emerging federal civil rights requirements.

During the 1980s, the County expanded its role beyond internal employment practices to address discrimination affecting the broader community. In 1984, the BOCC adopted Ordinance 84-10 that extended nondiscrimination protections to housing, employment, and public accommodations throughout Pinellas County. This ordinance created an enforcement framework aligned with the Civil Rights Act and the Fair Housing Act and authorized the County to investigate and resolve discrimination complaints occurring within its jurisdiction.

In 1992, the BOCC revised and reorganized the County's civil rights enforcement structure and protected classes mostly to align County procedures with evolving federal and state civil rights standards through adoption of Ordinances 92-14 and 92-49. Chapter 70 formally established administrative procedures for intake, investigation, conciliation, and adjudication of discrimination complaints and designated the Director of the Office of Human Rights as the County's chief enforcement official for these matters. The ordinances also authorized administrative hearings, civil remedies, and referral to the County Attorney when necessary.

Over time, the BOCC further expanded OHR's responsibilities to include additional civil rights-related and labor-standards functions. These include ordinances establishing refueling assistance for persons with disabilities and the Wage Theft and Recovery Ordinance in 2012 and 2015, respectively. In parallel, the County assigned OHR administrative responsibility for disability-related advisory bodies and accessibility initiatives, reflecting a broader role in promoting equitable access to County services and facilities.

#### **Governance and Organizational Placement**

OHR derives its authority directly from ordinances adopted by the BOCC and does not operate within the County Administrator's chain of command. Under Chapter 70, enforcement authority for employment, housing, and public accommodations discrimination is delegated by the BOCC to the Director of OHR, who is responsible for administering investigations, mediation, and formal enforcement processes.

OHR is overseen by the Human Rights Board (HRB), which was established by Ordinance 95-32 to provide administrative oversight of OHR operations. The HRB does not conduct investigations but receives reports, reviews metrics, and helps ensure that enforcement activities remain consistent with County policy and applicable civil rights laws.

The composition and role of the HRB have evolved since its original creation. In its current form, established by Ordinance 16-38, membership includes representatives from the Board of County Commissioners, the Clerk of the Circuit Court, the Property Appraiser, the Supervisor of Elections, the Tax Collector, the County Administrator, the Chairperson of the Unified Personnel Board, the Director of Human Resources, the Chairperson of the Employee Advisory Council, and the Chief Information Officer (or their designees). This structure is intended to provide both institutional accountability and public input into the County’s civil rights enforcement and compliance efforts.

In addition to the HRB, the OHR provides administrative support to the Pinellas County Council for Persons with Disabilities, a BOCC-appointed advisory body that reviews accessibility issues and advises the County on disability-related policy matters. Through this role, OHR functions as a conduit between advisory boards, operational departments, and the BOCC on matters related to access and accommodation.

### Current Mission and Program Areas

Today, the OHR serves as the County’s primary civil rights enforcement and compliance entity, with responsibilities that span public enforcement, internal employment matters, regulatory compliance, and coordination of access services. These responsibilities can be broadly grouped into five functional areas. These programs and programmatic areas are listed below in Table 4

Table 4. *Office of Human Rights Programs*

| Functional Area  | Program  |
|--|--|
| <b>Disability Access, Accommodation, and Advisory Services</b> | <b>ADA Coordinator and Transition Plan Administration:</b> Oversight of County compliance with the Americans with Disabilities Act, including investigation of accessibility complaints and coordination of barrier removal and program accessibility efforts in collaboration with operating departments. |
|  | <b>Pinellas County Council for Persons with Disabilities:</b> Administrative support to the BOCC-appointed advisory council that reviews accessibility concerns and provides policy recommendations related to disability access.  |
|  | <b>Countywide Reasonable Accommodation Intake Systems:</b> Management of accommodation request lines, telecommunications devices for the deaf (TDD), and centralized online request platforms.   |
|  | <b>Accommodation and Interpretation WebForms:</b> Administration of centralized web-based systems used by County departments and the Clerk of Court to request accommodations and interpreter services.  |

| Functional Area                              | Program  |
|--|--|
| <b>Title VI Nondiscrimination Compliance</b> | <b>County Limited English Proficiency (LEP) Plan:</b> Development and monitoring of County procedures to ensure meaningful access to services for individuals with limited English proficiency through LanguageLine.   |
|  | <b>Title VI Nondiscrimination Compliance:</b> Administration of grievance procedures for discrimination claims against County provided programming. This includes both programs that have direct federal backing and those that are not federally backed.  |
| <b>Grant &amp; Reporting Compliance</b>      | <b>Equal Employment Opportunity Plan (EEO) Reporting:</b> Preparation of required employment utilization and labor market analyses for EEOC, granting, and other requesting agencies.  |
|  | <b>Federal Grant Civil Rights Compliance (2 CFR Part 200, ADA/Section 504):</b> Oversight of nondiscrimination and accessibility assurances required as part of grant administration and program funding.  |
| <b>Local and Regulatory Compliance</b>       | <b>Refueling Assistance:</b> Enforcement of local ordinance requiring fuel retailers with more than one attendant to assist those with disabilities in pumping gas as well as placing notifications on gas pumps. The Office also does outreach to retailers. Violations can result in significant fines.            |
|  | <b>Wage Theft and Recovery Program:</b> Investigation and resolution of claims involving nonpayment or underpayment of wages, including earned leave benefits, with administrative hearings conducted through the Division of Administrative Hearings when necessary.  |
|  | <b>Harassment Training and Investigations:</b> Independent investigation of internal complaints of harassment and discrimination involving County employees, pursuant to County policy and applicable federal and state employment laws. Also includes providing required training on harassment and discrimination. |

As noted by OHR, their mission includes:

Promoting training, compliance, and education helps prevent future discrimination. The Office of Human Rights (OHR) provides training in areas such as fair housing, equal employment laws, public accommodations, the Americans with Disabilities Act (ADA), service and emotional support animals, and county internal policies. These training sessions are offered to employers, housing providers, community agencies, and other stakeholders.

OHR staff have served as presenters, panelists, and subject matter experts at conferences, symposiums, and community partnership events. The office has conducted hundreds of outreach and training activities, including coordinating the Annual Fair Housing Symposium.

OHR staff serve as subject matter experts across all areas within the office. Team members have completed extensive training and obtained certifications in areas including housing, employment, sexual harassment, customer service, FDOT civil rights and grant funding compliance, public and affordable housing, Title VI, and the ADA, among others.

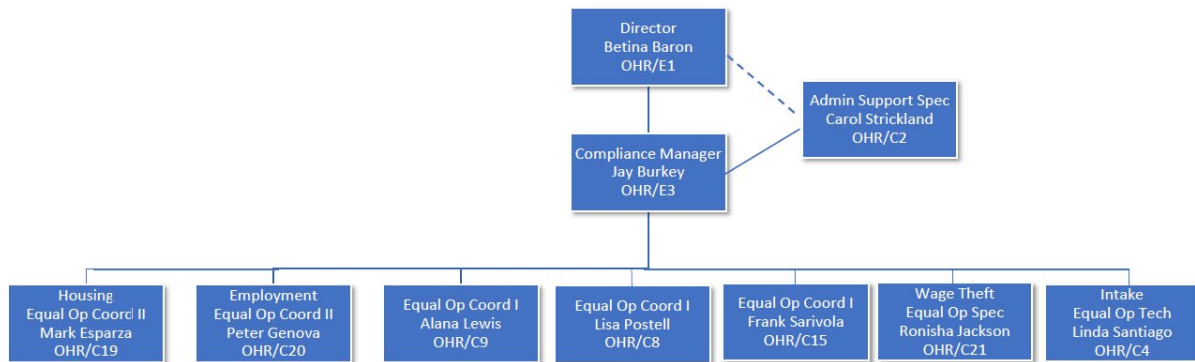
In addition to supporting internal stakeholders, including Human Resources, OHR staff provide guidance to management companies, disability service providers, public housing authorities, other municipalities, business owners, landlords, and employers.”

### Staffing and Budget

As reflected in the FY 26 organizational structure, OHR operates with 10 full-time equivalent (FTE) positions responsible for administering these programs. The staffing complement of 10 employees has not changed in at least the last five years. In addition to their regular duties, OHR staff, like many County employees, are designated as essential personnel during emergencies and may be assigned to support emergency response operations as needed.

Figure 2. OHR FY 2026 Organizational Chart

## Pinellas County Office of Human Rights FY26 Organization Chart



The OHR budget is broken down into two sections. The first covers most of the Office’s operating programs (Section 7101). The second section (7102) covers the Office’s fair housing program, which must remain separated due to federal regulations and provides housing support separate from what is typically required for federal grant compliance. A high-level summary of revenues and expenditures for the entire office for the last five years are shown below in Table 5.

Table 5. OHR 5-Year High-Level Budget Overview

| Line Item                         | FY 22 Actual | FY 23 Actual     | FY 24 Actual     | FY 25 Actual     | FY 26 Budget     |
|-----------------------------------|--------------|------------------|------------------|------------------|------------------|
| <b>OHR Program Revenues</b>       |              |                  |                  |                  |                  |
| Reimbursement from EEOC           | 0.00         | 77,400.00        | 46,128.46        | 33,446.54        | 25,000.00        |
| Wage Theft Recovery Revenues      | 0.00         | 0.00             | 0.00             | 34.33            | 0.00             |
| <b>Total OHR Program Revenues</b> | <b>0.00</b>  | <b>77,400.00</b> | <b>46,128.46</b> | <b>33,480.87</b> | <b>25,000.00</b> |

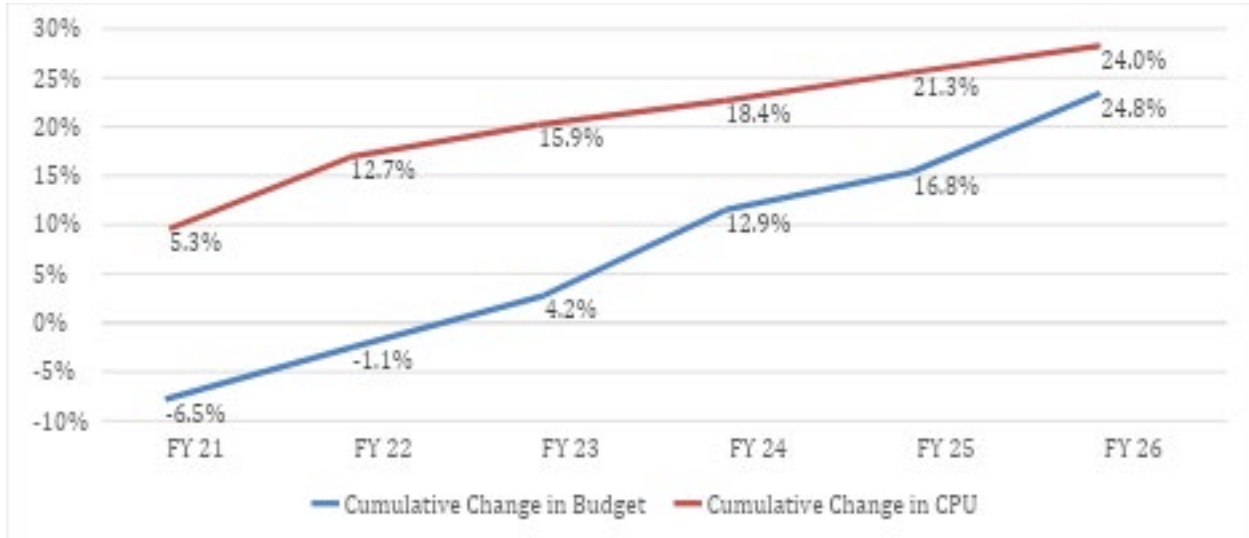
| Line Item                              | FY 22 Actual          | FY 23 Actual          | FY 24 Actual          | FY 25 Actual          | FY 26 Budget          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| <b>Percent Change</b>                  |                       | <b>N/A</b>            | <b>-40%</b>           | <b>-27%</b>           | <b>-25%</b>           |
|  |                       |                       |                       |                       |                       |
| <b>OHR Program Expenditures</b>        |                       |                       |                       |                       |                       |
| Personnel                              | 546,796.70            | 573,128.91            | 467,422.75            | 483,761.39            | 491,600.00            |
| Operating                              | 62,277.69             | 62,051.11             | 70,174.41             | 75,072.40             | 111,310.00            |
| <b>Total OHR Program Expenditures</b>  | <b>\$609,074.39</b>   | <b>\$635,180.02</b>   | <b>\$537,597.16</b>   | <b>\$558,833.79</b>   | <b>\$602,910.00</b>   |
|  |                       | <b>4%</b>             | <b>-15%</b>           | <b>4%</b>             | <b>8%</b>             |
|  |                       |                       |                       |                       |                       |
| <b>Fair Housing Program Revenue</b>    |                       |                       |                       |                       |                       |
| Federal Fair Housing Grant             | 243,440.00            | 249,200.00            | 244,409.94            | 0.00                  | 150,000.00            |
| Records Request Reimbursement          | 101.10                | 0.00                  | 0.00                  | 0.00                  | 0.00                  |
| <b>Total Fair Housing Revenues</b>     | <b>\$243,440.10</b>   | <b>\$249,200.00</b>   | <b>\$244,409.94</b>   | <b>\$0.00</b>         | <b>\$150,000.00</b>   |
|  |                       | <b>2%</b>             | <b>-2%</b>            | <b>-100%</b>          | <b>N/A</b>            |
|  |                       |                       |                       |                       |                       |
| <b>Fair Housing Expenditures</b>       |                       |                       |                       |                       |                       |
| Personnel                              | 506,652.58            | 552,061.25            | 750,068.71            | 782,521.28            | 795,590.00            |
| Operating                              | 52,289.02             | 42,470.53             | 49,244.59             | 47,766.54             | 102,210.00            |
| <b>Total Fair Housing Expenditures</b> | <b>\$558,941.60</b>   | <b>\$594,531.78</b>   | <b>\$799,313.30</b>   | <b>\$830,287.82</b>   | <b>\$897,800.00</b>   |
|  |                       | <b>6%</b>             | <b>34%</b>            | <b>4%</b>             | <b>8%</b>             |
|  |                       |                       |                       |                       |                       |
| <b>Total Office Revenues</b>           | <b>\$243,541.10</b>   | <b>\$326,600.00</b>   | <b>\$290,538.40</b>   | <b>\$33,480.87</b>    | <b>\$175,000.00</b>   |
|  |                       | <b>34%</b>            | <b>-11%</b>           | <b>-88%</b>           | <b>423%</b>           |
| <b>Total Office Expenditures</b>       | <b>\$1,168,015.99</b> | <b>\$1,229,711.80</b> | <b>\$1,336,910.46</b> | <b>\$1,389,121.61</b> | <b>\$1,500,710.00</b> |
|  |                       | <b>5%</b>             | <b>9%</b>             | <b>4%</b>             | <b>8%</b>             |

As shown above, budgeted program revenues for OHR (Section 7101) have decreased by 67.7% compared with FY 23 actual amounts. This change primarily reflects the timing of when federal funds are encumbered and recorded. It is not due to a decrease in caseload or changes in per case revenue. Rather, it is because federal reimbursements are often received in a variable timeframe after being earned. The Fair Housing Section (7102) budgeted revenues seem volatile, but they are relatively stable. They are dispersed based on federal timing, which sometimes makes it seem irregular. More information is provided in the FHAP section of this report.

During a similar period (FY 22 actual through the FY 26 budget), expenditures for the Office have increased by \$332,694.01. Some of these increases were driven by County-established

replacement schedules that are outside of the Office’s control. Additionally, the Office’s current budget request is a decrease of \$89,210 from the FY 26 budgeted amount. In fact, since at least FY 20, the Office’s budget has just kept up with inflation.

Figure 3. *Office of Human Rights Budget % Change Vs. CPI-U Percent Change*



*Note.* Actual expenditures through FY 25 are used to calculate percent changes through that period. Budgeted amounts are used for FY 26. CPI-U (not seasonally adjusted) was calculated using values for the months corresponding to the County’s fiscal year (October through September) to allow for more accurate comparison. CPI-U data through September 2025 are from the U.S. Bureau of Labor Statistics. Forecasts beyond that period are derived from the Congressional Budget Office.

### Peer Comparison

For this review, Pinellas County identified six peer jurisdictions for comparison (listed below in order of distance from Pinellas County):

- Hillsborough,
- Pasco,
- Sarasota,
- Palm Beach,
- Broward, and
- Miami-Dade Counties.

These jurisdictions were selected to provide a representative range of counties that share similarities with Pinellas County in areas such as population, service complexity, and governmental structure, while also reflecting some variation in demographics, governance approaches, and regional context. Because no two counties operate under identical conditions, using a range of peers allows the analysis to capture different administrative strategies and organizational models that counties of similar scale use to address comparable issues. This broader comparison provides a more informative benchmark than attempting to identify exact replicas of Pinellas County, which do not exist in practice.

This analysis focuses on high-level program functions and governance structures only. Direct budget comparisons are not meaningful in most cases because peer counties fund and administer comparable civil rights, labor standards, and access-related functions across multiple departments using different organizational configurations.

Overall, most core civil rights and nondiscrimination functions performed by the Pinellas County OHR are also provided by peer counties, though they are sometimes distributed across separate departments rather than housed within a single office.

A detailed summary of departmental placement for each peer county is provided in Appendix B.

## ADA Programs

This section covers Americans with Disabilities (ADA) programs including ADA Coordinator, ADA Transition Plan, compliance programs related to ADA, countywide reasonable accommodations for phone systems, web accommodation and interpretation, and American Sign Language services for those that are hearing impaired.

### Program Purpose, Authority, & Customers

The ADA Coordinator is a legally required focal point for ensuring that the County complies with ADA Title II and related disability-access obligations across all programs, services, and activities. The role exists to provide central accountability for ADA compliance, ensure consistent interpretation and application of disability access requirements, coordinate responses to accommodation requests and grievances, and reduce legal, financial, and reputational risk by identifying and rectifying issues in individual departments. The ADA Coordinator ensures the County acts as one government, not dozens of disconnected entities, when responding to disability access issues.

ADA Transition Plans are strategic planning and compliance documents required under ADA Title II when structural barriers exist. Their purpose is to provide a systematic, prioritized roadmap for removing barriers to access in County facilities, programs, and services. The Transition Plan exists to identify existing barriers to accessibility, prioritize remediation based on program access, establish a phased, fiscally responsible plan for compliance, and demonstrate good-faith compliance to regulators and courts. The County's Transition Plans are evidence that accessibility is being addressed proactively, not only in response to complaints.

The ADA Compliance Program is the system through which the County meets its ongoing legal obligations under ADA Title II and Section 504 of the Rehabilitation Act of 1973. It is broader than a single role or plan and encompasses policies, procedures, training, monitoring, and enforcement. The compliance program exists to ensure equal access to County services and programs, prevent discrimination, maintain required documentation and grievance procedures, and integrate accessibility into daily operations.

Lastly, OHR consults with County departments on TDD & Countywide Reasonable Accommodation and Webform Accessibility & Interpretation. In this role, the Office supports departments in making reasonable accommodation for individuals in accessing county information, processes, and services. This includes providing American Sign Language (ASL) interpretation and other communication accommodations for individuals who are deaf or hard of hearing, as required under the [Americans with Disabilities Act \(ADA\)](#) and [Section 504 of the Rehabilitation Act of 1973](#). Requests for ASL interpretation are treated as requests for reasonable accommodation and may be fulfilled through contracted interpreters, video remote interpreting services, or other assistive communication tools depending on the circumstances.

Federal law providing authority is mostly found in the [Americans with Disabilities Act \(ADA\), Title II \(42 U.S.C. §§ 12131–12165\)](#), which prohibits disability discrimination by state and

local governments, requires equal access to programs, services, and activities, and mandates reasonable modifications, effective communication, and grievance procedures. Specifically, [28 CFR Part 35 \(DOJ Title II Regulations\)](#) requires designation of an ADA Coordinator, adoption and publication of grievance procedures and establishes program access standards.

[Section 504 of the Rehabilitation Act of 1973 \(29 U.S.C. § 794\)](#) prohibits disability discrimination in programs receiving federal financial assistance and requires procedural safeguards, notice, and complaint resolution.

Florida law supports the Federal requirements in the [Florida Civil Rights Act \(FCRA\) \(Fla. Stat. §§ 760.01–760.11\)](#), which also prohibits discrimination based on disability in public accommodations and government services. It includes provisions for state-level enforcement and remedies.

[Pinellas County Code of Ordinances Chapter 70: Human Relations \(Articles I-IV\)](#) establishes the Office of Human Rights' authority over ADA issues within the context of the County's anti-discrimination ordinance. This ordinance gives OHR the local legal authority to receive, investigate, and make recommendations on discrimination complaints in the County government and across the community. Specifically, Chapter 70 says "It shall be an unlawful practice to discriminate against any individual in the provision of County programs, services, or activities on the basis of protected characteristics, including disability."

Pinellas County has a [Title VI Policy and Grievance Procedure](#) published on their website that designates the Office of Human Rights as the conduit and establishes intake, investigation, response, and appeal processes.

External customers for these subprograms are residents and visitors with disabilities, individuals requesting reasonable accommodations, individuals filing ADA or Section 504 grievances, advocates, caregivers, and representatives, and Federal and state oversight agencies (e.g., DOJ, HUD, DOT) during reviews or investigations. Internal customers include County departments for guidance on ADA requirements and support in resolving accommodation issues. These include the County Attorney's Office, Human Resources, Risk Management, Facilities, Public Works, Parks, and County leadership to provide a coordinated response to complaints and provide assurance that legal obligations are being met consistently.

## **Budget, Funding Sources, Staffing, & Performance Metrics**

### ***Budget & Staffing***

The various ADA-related duties amount to about 8% of the workload within OHR for FY 26. The level of effort during that time equates to the following amounts:

- Revenues
  - \$0
- Expenditures

- \$120,057
- FTEs
  - 0.80

Included in these expenditures is the average annual cost of the ASL interpretive service contracts alone over the last several years is approximately \$9,264. Costs vary depending on the type of service provided.

**Performance Metrics**

The demand for services for deaf and hard-of-hearing constituents is documented in Table 6 for last year and projected for FY 26. American Sign Language translations are the most common request received.

Table 6. *Number of Requests for ASL Interpretive Services Program*

| Number of Requests         | FY 2025 Actual | YTD 2026 Actual | Projected 2026 |
|----------------------------|----------------|-----------------|----------------|
| ASL Interpreting           | 76             | 33              | 99             |
| CART <sup>1</sup>          | 25             | 23              | 69             |
| Assisted Listening Devices | 26             | 4               | 12             |
| Total ASL Requests         | 127            | 60              | 180            |

*Note.* Projected FY2026 amounts were estimated by annualizing year-to-date (YTD) 2026 actual data.  
<sup>1</sup>CART = Communication Access Real-Time Translation (real-time subtitles)

There are no specific metrics used to monitor other ADA transition plan activities, but staff did provide detail on several measurable outcomes that could be used in the future to determine program effectiveness. For example, staff could measure the percentage of county facilities that have been evaluated for ADA compliance since there is a county facility Transition Plan, a Transition Plan for sidewalks and curbs, and a digital Transition Plan in Business Technology Services. Another measure could be the number of projects in those plans currently funded in the CIP.

For FY 25, there were 138 inquiries received via the ADA accommodations webform, and nine grievances filed. For public accommodations, there were 28 enquiries and forms submitted, with five based on disability.

The County and constitutional officers have the required accessibility statements posted online. They can be found at:

- County Policy: <https://pinellas.gov/pinellas-county-accessibility-statement/>
- Forward Pinellas: <https://forwardpinellas.org/legal/website-accessibility-statement/#:~:text=Forward%20Pinellas%20is%20committed%20to,the%20Florida%20Civil%20Rights%20Act>
- Property Appraiser: <https://www.pcpao.gov/Accessibility-Information>
- Supervisor of Elections (SOE): <https://www.votePinellas.gov/site/accessibility>

- Clerk: <https://www.mypinellasclerk.gov/ADA-Records>

From FY 25, OHR's TDD line (727-464-4062) received 5,968 calls. Of those calls:

- 25% were the wrong number
  - Indicates calls that were not directly for OHR services (i.e., deferral to another agency or department, such as utilities, legal services, or code enforcement).
- 35% were for the Clerk of the Court
- 15% were for accommodation/language requests
- 25% were for other miscellaneous reasons

OHR delivers training annually on ADA responsibilities. For FY 25, the following departments received training, with the number of employees in parentheses (a total of 98 people were trained):

- Building & Development Review (1)
- Extension (1)
- Human Services (1)
- Justice and Consumer Services (1)
- OMB (1)
- Parks (7)
- Planning (1)
- Public Works (16)
- Public Works Environmental Management (3)
- Safety & Emergency Services (9)
- Solid Waste (3)
- Stormwater (1)
- Utilities (21)
- BTS (1)
- Clerk's offices (14 offices, 20 participants)
- Human Resources (2)
- Property Appraiser (3)
- Supervisor of Elections (6)

## Duplication or Overlap Analysis

While OHR works with several departments and offices on various ADA-related issues and projects, no other areas in the county perform similar work. The nearest complementary services are ADA Title I oversight in Human Resources, for employment related compliance.

## Peer Comparison

Because of the federal requirements, all six peer counties have this function.

[Broward](#) County operates a central ADA administration model supported by a formal Advisory Board for Individuals with Disabilities, making it the closest structural peer to Pinellas' OHR and Council for Persons with Disabilities combination. Responsible staff is the ADA Administrator – Professional Standards, Averill Dorsett, at (954) 357-6500 or TTY: (954) 357-7888, located at 115 S. Andrews Ave., Suite 427, Fort Lauderdale, FL 33301.

[Hillsborough](#) County maintains a central ADA Officer model with a clearly identified public entry point for accommodation requests and ADA grievances. Responsible staff is the ADA Officer, reached by email ([ada@hcfl.gov](mailto:ada@hcfl.gov)) or phone (813) 276-8401.

[Miami-Dade](#) County uses a federated compliance model. ADA responsibility is assigned to each department, with a central support office. Responsible staff is the County ADA Office, reached by email ([adaoffice@miamidade.gov](mailto:adaoffice@miamidade.gov)) or phone (305) 375-3566.

[Palm Beach](#) County has ADA responsibilities coordinated through an Equal Opportunity office. Responsible staff is the Office of Equal Opportunity, reached by email ([pbaccessibility@pb.gov](mailto:pbaccessibility@pb.gov)) or phone (561) 355-4884. In addition, the Palm Beach Transportation Planning Agency has a Title VI & ADA Officer, Melissa Murray, reached by email ([MMurray@PalmBeachTPA.org](mailto:MMurray@PalmBeachTPA.org)) and phone (561) 684-4143.

[Pasco](#) County uses an HR-led compliance model. ADA and Title VI responsibilities are consolidated. The staff responsible is the Human Resources Director, who is the ADA & Title VI Designee. Currently that is Barbara Hitzemann, reached by email ([bhitzemann@pscocountyfl.net](mailto:bhitzemann@pscocountyfl.net)) or phone (727) 847-8103, and is located at 7536 State St., Suite 111, New Port Richey, FL 34654.

In addition, the Pasco Metropolitan Planning Organization (MPO) operates a standalone Title VI & ADA compliance program, including a nondiscrimination policy, LEP plan, complaint procedures, and public notices. Responsible staff reside in the Title VI/ADA Program, reached by email ([civilrights@pscocountyfl.net](mailto:civilrights@pscocountyfl.net)) or phone (727) 834-3322.

[Sarasota](#) County maintains a fully integrated ADA and Title VI model with one coordinator in County Administration, providing a single point of contact. Responsible staff is the ADA & Title VI Coordinator, reached by email ([adacoordinator@scgov.net](mailto:adacoordinator@scgov.net)) or phone (941) 861-5000, and is located at 1301 Cattlemen Rd., Sarasota, FL 34232.

Sarasota also has a [Transportation Authority](#) that monitors Title VI and other compliance for transportation-related grants.

### ***Other Relevant Models***

Large Florida cities such as Orlando, Tampa, and Jacksonville maintain independent human-rights or civil-rights offices responsible for ADA, Title VI, and discrimination

enforcement, and some are supported by separate advisory bodies that provide disability and community input.

Orlando maintains a stand-alone [Office of Human Relations](#) that functions as the City's primary civil-rights agency, responsible for enforcing local nondiscrimination ordinances and coordinating compliance with ADA and Title VI. The Office investigates discrimination complaints in public accommodations, housing, and employment, and serves as a centralized point of accountability for accessibility and equal-access issues affecting City programs and services. Orlando complements this enforcement role with advisory boards and commissions that provide community input on equity, accessibility, and inclusion, creating a structure similar to Pinellas County.

Tampa operates a City of [Tampa Office of Human Rights](#) as an independent civil-rights function charged with enforcing local human-rights ordinances and administering ADA and Title VI obligations across City government. The Office handles discrimination complaints, reasonable accommodation issues, and accessibility compliance, and serves as a centralized authority. Tampa also relies on advisory bodies and task-specific committees to provide disability and accessibility input on infrastructure, housing, and public services. This model is consistent with the Pinellas OHR framework.

Jacksonville (Duval County) is one of Florida's strongest structural peers to Pinellas County, operating an independent [Jacksonville Human Rights Commission](#) with ordinance-based authority. The Commission is responsible for investigating discrimination complaints under local law, including matters related to ADA accessibility, Title VI nondiscrimination, fair housing, employment, and public accommodations. In addition, Jacksonville maintains disability-focused advisory committees and community councils that provide policy and accessibility input separate from enforcement staff. This closely mirrors Pinellas County's OHR and Council for Persons with Disabilities model.

## **Risk Assessment of Program Reorganization, Reduction, or Elimination**

### ***Program Reorganization***

After reviewing peer governments and the Pinellas County structure, three options appear viable: keeping the ADA Coordinator (and associated programming) within OHR or moving the function to either Human Resources or County Administration. Moving the functions would probably not generate much in savings, as the workload would be expected to be the same for the department taking it on and only accounts for 0.80 FTE. The following section outlines the benefits and drawbacks for each option.

### **Option A: Keep ADA Coordinator in Office of Human Rights (OHR)**

- **Benefits**
  - Civil rights alignment: Natural alignment with discrimination investigation, grievance processes, and equity oversight.
  - Independence from operational departments: OHR is structurally separate from departments that may be subjects of complaints, providing stronger defensibility in DOJ review or litigation.
  - Public credibility: The community sees ADA complaints handled by a neutral rights-based entity, reducing perception of internal conflict of interest.
  - Grievance investigation expertise: OHR staff typically already conduct discrimination investigations.
  - Policy consistency: Integration with Title VI, Fair Housing, and other civil rights frameworks.
- **Drawbacks**
  - Potential distance from operational implementation: OHR lacks direct control over facilities, IT, CIP budgeting, requiring strong cross-department coordination.
  - Perception of enforcement: Departments may view OHR as compliance oversight rather than implementation partner.

### **Option B: Move the function to Human Resources (HR)**

- **Benefits**
  - Familiarity with accommodation processes: HR already handles employee ADA accommodations (Title I), so there may be some similarity in grievance procedures.
  - Policy infrastructure: HR has established training systems and compliance documentation processes.
  - Internal culture influence: May be able to fit ADA training into onboarding and supervision practices (which OHR currently provides in this setting).
- **Drawbacks**
  - Misalignment of scope: Title II (public access) is distinct from Title I (employment). HR focus is employees; ADA Coordinator must focus on public access.
  - Conflict of interest risk: HR defends the organization in employment disputes. In addition, ADA complaints may involve systemic failures beyond HR's scope.
  - Limited authority over facilities and IT: Like OHR, HR typically does not have expertise in these areas.
  - Perception problem: Public-facing disability access oversight housed in an internal employment unit may appear inward-facing.

### **Option C: Move to County Administration**

- **Benefits**
  - Organizational authority: Direct access to department heads and influence over budget, CIP, and operational priorities.
  - Cross-department coordination: Strong leverage for transition plan implementation.
  - Visibility to elected officials: Easier reporting to the Commission.
- **Drawbacks**
  - Reduced perceived independence: ADA complaints about departments are investigated within executive structure, which may present a perception problem.
  - Political exposure: ADA complaints may become managed rather than compliance oriented.
  - Risk of diffusion: Without dedicated staffing, ADA duties may become secondary among many executive priorities.

#### ***Program Reduction***

While certain elements of the ADA functions must be maintained by the county, some activities, such as training and plan development could be outsourced, but are unlikely to generate any cost savings.

#### ***Program Elimination***

Because having an ADA coordinator and transition plan is required by Federal statutes and codes, the function must be placed somewhere in the organization.

## Title VI

This section provides the results of the review of the [Title VI program](#), as well as the [County's Limited English Proficiency Plan \(LEP\)](#) and LanguageLine service. LanguageLine is the vendor used to ensure compliance with Title VI of the Civil Rights Act of 1964 and meaningful access for individuals with LEP.

### Program Purpose, Authority, & Customers

#### *Purpose*

The purpose of Pinellas County's Title VI program is to ensure that the County is compliant with [Title VI of the Civil Rights Act of 1964](#). This is a requirement of the federal government triggered by the County's acceptance and utilization of federal funding.

#### *Authority*

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs or activities receiving federal financial assistance. It provides some overarching requirements that all federal agencies are required to include in their grant agreements, as well as requirements that are agency specific. General requirements that OHR manages for Pinellas County include:

- Designation as the County Title VI Coordinator
- Management of grievance procedures related to Title VI
- Creation and maintenance of the County's Limited Language Proficiency Plan

Agency specific items are codified by the specific agency providing the funding and would be included in the grant agreements between the federal government and Pinellas County. Agencies providing federal funding include:

- The Federal Aviation Administration (FAA)
- The Department of Transportation (DOT)
- The Federal Emergency Management Administration (FEMA)
- The Department of Housing and Urban Development (HUD)
- The Department of Health and Human Services (HHS)
- The Department of Justice (DOJ)

#### *Customers*

Direct customers of the Title VI program are County departments that rely on OHR to fulfill countywide compliance requirements, while indirect customers include residents, visitors, and other individuals who utilize services provided through the program, such as LanguageLine and the grievance process, particularly those with limited English proficiency.

## **Programs**

### **Title VI Coordination**

This position serves as the County's designated Title VI Coordinator and manages the Title VI program, including administration of grievance procedures and coordination with operational departments to ensure compliance. Pinellas County has designated the Director of the Office of Human Rights as the Title VI Coordinator.

### **Title VI Policy & Grievance Procedures**

OHR implements the County's grievance procedure. This includes the intake of complaints, coordination of complaint responses, communication with the grievant, maintenance of records, and notifications to the federal government. The Office also provides notification and coordination for any appeals requested by the grievant, as well as administrative support during the appeal hearing.

While OHR may provide guidance resolutions to departments regarding these grievances, the resolutions themselves are made by the affected department.

### **Limited English Proficiency (LEP) Plan**

The purpose of the [Pinellas County Limited English Proficiency \(LEP\) Plan](#) is to ensure that individuals who have limited ability to read, write, speak, or understand English are able to access County information, programs, services, and activities. Individuals with limited English proficiency (LEP) are those whose primary language is not English and who have limited ability to communicate effectively in English. Federal guidance commonly operationalizes LEP using U.S. Census data as individuals who speak English "less than very well," which include those who report speaking English "well," "not well," or "not at all." The County's LEP Plan outlines procedures and resources used to provide interpretation and translation services to facilitate communication between County staff and members of the public.

Federal civil rights law provides the primary legal authority for language access programs. Courts and federal agencies have long recognized that language barriers can constitute national origin discrimination when they prevent individuals from accessing government programs or services. As a result, recipients of federal funding are expected to take reasonable steps to ensure that individuals with limited English proficiency have meaningful access to important services and information.

Historically, federal agencies provided guidance to recipients of federal funding through [Executive Order 13166 \(2000\)](#), which directed federal agencies to improve access to services for

persons with limited English proficiency and encouraged recipients of federal funding to implement language access plans. In March 2025, [Executive Order 14224](#) designated English as the official language of the United States and revoked Executive Order 13166. The order directed the U.S. Department of Justice to rescind prior policy guidance issued under that executive order and develop updated guidance consistent with applicable law. However, the order explicitly states that it does not require agencies or recipients of federal funding to discontinue existing language assistance services, and statutory obligations under Title VI remain in effect.

A commonly referenced threshold in federal guidance is when a language group constitutes more than 5% of the population or at least 1,000 individuals and speaks English “less than very well.” This threshold is often referred to as a “safe harbor,” indicating that translation of vital documents for that language group is strongly recommended, though not statutorily required. Based on the 2024 American Community Survey, approximately 6.1% of Pinellas County residents age five and older speak English “less than very well.” While no single language group exceeds the 5% threshold, the total LEP population remains significant. Spanish-speaking residents represent the largest LEP group at 2.7% of the population (approximately 25,178 individuals), exceeding the 1,000-person safe harbor threshold, indicating that language access services for this population remain strongly supported under federal guidance despite falling below the 5% benchmark.

Recipients of federal financial assistance are still required to ensure meaningful access for individuals with limited English proficiency under Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d), which prohibits discrimination based on national origin and has been interpreted by federal agencies to include discrimination resulting from language barriers. Even when safe harbor thresholds are not met, federal guidance from the U.S. Department of Justice indicates that agencies must evaluate language access needs based on factors such as the size of the LEP population, frequency of contact, and importance of services. As a result, many local governments maintain formal LEP plans even when specific language groups fall below the safe harbor benchmark to demonstrate compliance with federal civil rights obligations.

Within Pinellas County, OHR administers the County’s LEP Plan and coordinates several tools used to provide language access services. These tools include LanguageLine telephonic and video interpretation services, which allow County staff to communicate with individuals in numerous languages on demand, as well as written translation services for vital documents and public information. The County also utilizes bilingual staff where available and provides guidance to departments on identifying language needs and accessing interpretation services. Telephonic interpretation services such as LanguageLine are commonly used by government agencies to provide immediate interpretation support across many languages and service environments.

## Budget, Funding Sources, Staffing, & Performance Metrics

### ***Budget & Staffing***

The various Title VI related duties account for about 6% of the workload within the OHR budget (in general fund dollars) for FY 26. The estimated level of effort during that time equates to the following amounts:

- Revenues
  - \$0
- Expenditures
  - \$90,043
- FTEs
  - 0.60

While the estimated annual cost for the Title VI program is approximately \$90,000, the average annual cost of the LanguageLine contract alone over the last several years is approximately \$25,197 (costs vary depending on the language selected).

### ***Performance Metrics***

Table 7 below summarizes performance metrics for the LanguageLine program. Requests for these services have generally increased since FY 22, although annual usage fluctuates. No other performance metrics were provided Title VI.

Table 7. *Number of Requests for LanguageLine*

| Service               | FY 22 Actual | FY 23 Actual | FY 24 Actual | FY 25 Actual | Projected 26 |
|-----------------------|--------------|--------------|--------------|--------------|--------------|
| LanguageLine Requests | 2,669        | 3,139        | 5,102        | 4,959        | 4,194        |
| Departments Utilized  | 23           | 24           | 21           | 25           | N/A          |

Note. N/A = Not Available.

### **Duplication or Overlap Analysis**

OHR coordinates with several departments and offices on various Title VI-related issues to ensure compliance; however, it performs the federally required role of Title VI Coordinator and manager of the grievance procedures. No duplication of the LanguageLine exists, though departments do have coordinators who assist with implementation at the department level.

## Peer Comparison

This section will cover comparisons to selected peer counties. Table 8 includes a cross-reference of which departments manage Title VI and LEP work.

Table 8. *Peer County Responsibility Comparison for Title VI & LEP*

| Jurisdiction | Title VI   | LEP  |
|--------------|--|--|
| Broward      | <a href="#">Office of Intergovernmental Affairs</a>                        | <a href="#">Office of Intergovernmental Affairs</a> <sup>1</sup> |
| Hillsborough | <a href="#">Office of Community Impact/Equal Opportunity Administrator</a> | Plan Hillsborough <sup>2</sup>                                   |
| Miami-Dade   | <a href="#">Department of Transportation and Public Works</a>              | N/R  |
| Palm Beach   | <a href="#">Engineering and Public Works</a>                               | N/R  |
| Pasco        | <a href="#">Human Resources</a>  | <a href="#">Human Resources</a>                                  |
| Sarasota     | <a href="#">County Administration</a>                                      | <a href="#">County Administration</a>                            |

Note. N/R = No Response.

<sup>1</sup>Although the Broward website indicates the contact information for LEP information and complaints is the Title VI Coordinator, the Coordinator indicated they were not responsible for LEP. At the time of this writing, Broward County did not provide any alternate contacts for this program.

<sup>2</sup>The Hillsborough Metropolitan Planning Organization (MPO) (now known as Plan Hillsborough) manages the Limited English Proficiency (LEP) Plan.

At the time of this writing, the LEP plan and LanguageLine information has not been received from all of the peers. Much of the information we were able to gather pertains to the Metropolitan Planning Organization (MPO) for Hillsborough and Palm Beach.

Table 9 compares English proficiency among residents age five and older in Pinellas County and selected Florida peer counties using 2024 American Community Survey data. Consistent with federal guidance, individuals with limited English proficiency (LEP) are defined as those who speak English “less than very well.”

Table 9. *Peer Comparison Population Speaking English “Less Than Very Well” by Language*

| Category   | Pinellas             | Broward      | Hillsborough | Miami-Dade   | Palm Beach   | Pasco       | Sarasota    |
|--|----------------------|--------------|--------------|--------------|--------------|-------------|-------------|
| <b>2024 Population</b>   | 929,566              | 1,929,058    | 1,494,485    | 2,686,930    | 1,504,063    | 627,660     | 462,249     |
| <b>Speak only English</b>  | 83.2%                | 54.2%        | 68.4%        | 24.3%        | 64.5%        | 79.2%       | 84.5%       |
| <b>Speak English "less than very well" (Total LEP)</b>                           | <b>6.1% (56,437)</b> | <b>18.3%</b> | <b>13.8%</b> | <b>36.3%</b> | <b>16.9%</b> | <b>6.3%</b> | <b>5.5%</b> |
| <b>LEP Population by Language (Sorted highest to lowest for Pinellas County)</b> |                      |              |              |              |              |             |             |

| Category                             | Pinellas         | Broward | Hillsborough | Miami-Dade | Palm Beach | Pasco | Sarasota |
|--------------------------------------|------------------|---------|--------------|------------|------------|-------|----------|
| Spanish                              | 2.7%<br>(25,178) | 12.3%   | 11.1%        | 33.5%      | 11.0%      | 4.2%  | 3.1%     |
| Asian & Pacific Island<br>(Combined) | 1.4%<br>(12,576) | 0.6%    | 1.2%         | 0.3%       | 0.7%       | 0.5%  | 0.6%     |
| Other Indo-European                  | 0.7%<br>(6,960)  | 1.4%    | 0.4%         | 0.4%       | 0.8%       | 0.7%  | 0.4%     |
| Slavic Languages                     | 0.6%<br>(6,034)  | 0.7%    | 0.2%         | 0.3%       | 0.3%       | 0.5%  | 1.1%     |
| French, Haitian, or<br>Cajun         | 0.3%<br>(3,001)  | 2.9%    | 0.4%         | 1.8%       | 3.5%       | 0.1%  | 0.2%     |
| Arabic                               | 0.2%<br>(1,953)  | 0.1%    | 0.5%         | 0.0%       | 0.1%       | 0.2%  | 0.0%     |
| Other                                | 0.1%<br>(735)    | 0.3%    | 0.1%         | 0.1%       | 0.4%       | 0.1%  | 0.2%     |

*Note.* Source: U.S. Census Bureau. "[Language Spoken at Home for the Population 5 Years and Over.](#)" American Community Survey, ACS 1-Year Estimates Detailed Tables, Table C16001, 2024.

As shown in Table 9, Pinellas County has one of the highest proportions of residents who speak only English (83.2%), second only to Sarasota County among peer jurisdictions analyzed. Correspondingly, Pinellas County has a relatively smaller LEP population at 6.1% (56,437 individuals), which is among the lowest in the comparison group, trailing only Sarasota (5.5%) and comparable to Pasco (6.3%). In contrast, larger counties such as Miami-Dade (36.3%), Broward (18.3%), Palm Beach (16.9%), and Hillsborough (13.8%) have substantially higher LEP populations.

Within Pinellas County, Spanish-speaking residents represent the largest LEP group at 2.7% of the population (25,178 individuals), followed by Asian and Pacific Island languages (1.4%) and other Indo-European languages (0.7%). While no single language group exceeds the commonly referenced 5% threshold, multiple language groups exceed the 1,000-person safe harbor benchmark in federal guidance, supporting the continued provision of language access services.

The existence of a measurable LEP population, even at lower proportions relative to peer counties, also explains the County's continued use of interpretation services such as

LanguageLine, which enable departments to provide real-time communication with residents who have limited English proficiency.

## **Risk Assessment of Program Reorganization, Reduction, or Elimination**

### ***Program Reorganization***

Moving this function would likely have minimal direct financial impact. However, because Title VI compliance activities are currently coordinated through OHR, reassignment would require identifying another department with the capacity to administer grievance procedures, coordinate with departments, and monitor compliance with federal civil rights requirements. One potential option for the LEP plan and associated interpretation services would be to align Title VI with the County's ADA compliance function, as both programs address access to government services and civil rights protections if ADA was also moved out of OHR. Alternatively, some peer jurisdictions place these responsibilities within County Administration or distribute them across departments that directly provide services to the public. Any reassignment could require additional training, administrative coordination, and potentially the transfer of staff resources to maintain current service levels.

### ***Program Reduction***

In general, reducing Title VI services is not an option if the County wishes to continue receiving federal funding. While the DOJ has shifted away from disparate impact as a source of liability under Title VI, the effect this will have on agency specific requirements and sub-recipient grants, such as those acquired through the State of Florida, leaves the risk of program reduction high. As changes to individual grant compliance occur at the federal and state levels, there may be opportunities to reduce programming in the future; however, there is also the possibility that future administrations may reinstitute previous requirements.

The County could eliminate the LanguageLine program; however, doing so would not likely result in significant cost savings because the County would still need to identify another way to provide language access services. The County could review usage by language and consider discontinuing services for language groups that do not meet the 5% or 1,000-person threshold. This could produce some savings, but additional analysis would be needed, and any savings would likely represent only a small portion of the approximately \$25,000 annual contract. Peer jurisdictions we spoke with were generally not inclined to reduce their programs due to the significant number of non-English speakers in their communities, concern about potentially violating the law despite limited guidance, and a desire to continue providing a high level of customer service regardless of minimum legal requirements.

Regardless of whether LEP is required, reducing these services could lead to communication challenges, resulting in service delays, increased complaints, and operational inefficiencies.

### ***Program Elimination***

Eliminating this function could expose the County to litigation and potential loss of current and future federal funding. It would also significantly reduce access to essential services for LEP residents, likely resulting in service delays, increased complaints, and greater legal and operational risk. Because Title VI requirements arise from federal statutes and regulations, these responsibilities would still need to be assigned elsewhere within the organization. While counties are not required to use a specific vendor (e.g., LanguageLine), they must provide meaningful language access under Title VI of the Civil Rights Act of 1964. Despite recent changes in federal guidance, and evolving state policies related to language access, Title VI continues to require recipients of federal funding to take reasonable steps to ensure meaningful access for LEP individuals.

## Federal Grant Compliance

### Program Purpose, Authority, & Customers

The Office of Human Rights (OHR) serves as the County's central authority for civil-rights compliance tied to federal financial assistance, ensuring that departments receiving federal funds meet mandatory nondiscrimination and accessibility requirements that are conditions of those awards. This function is distinct from financial grant management and focuses on legal, programmatic, and civil-rights obligations embedded in federal funding agreements. OHR's role ensures that certifications made to federal agencies are accurate, defensible, and supported by actual policies, procedures, and practices.

OHR's oversight responsibilities include ensuring compliance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act, Title II of the Americans with Disabilities Act (ADA), and related federal authorities that prohibit discrimination in federally assisted programs. These requirements apply agency-wide, not solely to the specific program or project receiving federal funds, and failure to comply can result in audit findings, corrective action plans, enforcement proceedings, or the loss or recapture of federal funding. OHR provides subject-matter expertise to departments on these obligations and serves as the County's internal control for civil-rights compliance risk.

As part of this function, OHR is responsible for supporting and coordinating the completion of federal civil-rights assurances and certifications required by multiple funding agencies. These include, but are not limited to, EPA Form 4700-04 (Nondiscrimination in Programs Receiving Federal Assistance), U.S. Department of the Treasury civil-rights certifications associated with State and Local Fiscal Recovery Funds (SLFRF), and nondiscrimination assurances required under Department of Transportation, Natural Resources Conservation Service (NRCS), and other federal or pass-through grant programs. These certifications are legal representations that the County has adopted required policies, designated responsible officials, established complaint procedures, and is operating programs in a nondiscriminatory and accessible manner.

OHR's role also encompasses oversight of Section 508 of the Rehabilitation Act, which requires that electronic and information technology associated with federally funded programs—including websites, online applications, digital forms, and posted documents—be accessible to individuals with disabilities. Section 508 compliance is a civil-rights requirement, not an IT performance standard, and is increasingly scrutinized during federal compliance reviews and Single Audits as programs rely more heavily on digital access. OHR ensures departments understand these obligations and that accessibility considerations are integrated into program delivery and public communications.

Federal funding agreements and agency guidance—such as SLFRF award terms, NRCS General Terms and Conditions, and DOT Local Agency Program requirements—consistently

treat civil-rights compliance as a condition precedent and continuing obligation of funding. These requirements typically mandate the designation of a Title VI or nondiscrimination coordinator with access to executive leadership, public posting of nondiscrimination policies, adoption of complaint procedures, documentation of outreach and equitable access, and timely corrective action when deficiencies are identified. OHR provides centralized oversight to ensure these requirements are implemented consistently across departments.

In addition, OHR supports the Clerk of the Circuit Court's Single Audit responsibilities by providing documentation, explanations, and corrective-action support related to civil-rights compliance controls. Under the Uniform Guidance (2 CFR Part 200), federal auditors assess not only financial accuracy but also whether recipients maintain effective internal controls to ensure compliance with applicable federal statutes and regulations. OHR's involvement strengthens the County's audit posture by ensuring that civil-rights compliance is proactively managed, documented, and defensible during audit review.

## **Budget, Funding Sources, Staffing, & Performance Metrics**

### ***Budget & Staffing***

The staff support for grant compliance takes up about 6% of the workload within the OHR budget (in general fund dollars) for FY 26. The level of effort during that time equates to the following amounts:

- Revenues
  - \$0
- Expenditures
  - \$90,043
- FTEs
  - 0.60

### **Duplication or Overlap Analysis**

Federal grant civil rights compliance is a requirement of receiving funding, and while it is reasonable to assume that departments receiving funding should be aware of and responsive to those mandates, federal rules require separation of duties, objective internal controls, and monitoring that is not self-certifying. In Pinellas County, there are no functions that duplicate OHR's function, and, because it is policy related and not financial, it is distinct from OMB grants division activities, departmental grants coordinators, or audit functions in the Clerk of the Circuit Court's finance department.

## Peer Comparison

After reaching out to peer organizations and reviewing publicly available materials, most of the peer counties' placement of grant compliance is still not known. Because all federal grants require compliance monitoring as a condition of the grant, the assumption is that it is housed somewhere in each organization, so the entries below identify other relevant organizational locations for Title VI compliance that may be associated with grant compliance.

Broward County centralizes Title VI, ADA, and nondiscrimination compliance within its human-rights/equity structure, located within the County Administration, so it is likely that grants compliance is handled there as well, although this is not documented in publicly available materials.

Hillsborough County Title VI nondiscrimination compliance for federally assisted programs is administered through the Equal Opportunity Administrator's Office, which receives and investigates discrimination complaints related to federally funded activities; the specific organizational location of broader federal grants financial compliance and monitoring functions is not clearly identified in publicly available materials.

Miami-Dade County Title VI and related nondiscrimination requirements are implemented through departmental nondiscrimination coordinators and the County's centralized accessibility and civil-rights infrastructure, including ADA coordination and the Miami-Dade County Commission on Human Rights, while the organizational home of enterprise-wide federal grants financial compliance and monitoring is not explicitly documented in public sources.

Palm Beach places federal civil-rights compliance within an Equal Opportunity/Human Rights office in County Administration, with responsibilities that include Title VI, ADA/504, and grant-related nondiscrimination assurances. Grants compliance is not documented in public sources.

Pasco houses civil rights compliance in Human Resources, with the human resources director listed as the County's civil rights contact. At this time, we have not identified where grant compliance is conducted.

Sarasota keeps Title VI/ADA and federal nondiscrimination compliance coordinated through County Administration with Legal/Risk involvement. Whitney Barazoto, Ethics and Compliance Officer, is responsible for grant compliance.

## Risk Assessment of Program Reorganization, Reduction, or Elimination

### ***Program Reorganization***

The program could be moved, if desired, to areas that have some alignment with federal grants, as long as the expertise for this kind of analysis and oversight could be developed or

transferred to those other programs, such as OMB's Grants Division, the Clerk of the Circuit Court's Finance Division, or County Administration. What follows are benefits and drawbacks for these options.

### **Option A: Keep Federal Grant Civil Rights Compliance in OHR**

- **Benefits**
  - Alignment with subject-matter expertise: Civil-rights compliance is OHR's core mission across all activities.
  - Independence from programmatic and financial pressures: OHR can assess compliance objectively without incentives to minimize findings.
  - Consistency across departments: Centralized interpretation of federal civil-rights requirements reduces uneven application.
  - Stronger audit defensibility: Auditors expect civil-rights compliance to be managed by an office with enforcement and investigative authority.
  - Direct linkage to complaint handling: Compliance oversight is informed by real-world complaints and access issues.
- **Drawbacks**
  - Depends on inter-agency cooperation: Requires ongoing coordination with finance and grants management staff.
  - May be perceived as outside "enforcement" by departmental staff tasked with grant management.

### **Option B: Move the function to OMB Grants Division**

- **Benefits**
  - Closer integration with grant administration workflows (applications, reporting calendars).
  - Reduced hand offs: May require less time from a process or reporting standpoint.
- **Drawbacks**
  - Mismatch of expertise: Budget offices typically lack civil-rights investigative and regulatory expertise.
  - Conflict of interest risk: Offices responsible for securing or retaining funding may be incentivized to downplay compliance issues.
  - Weaker enforcement posture: OMB is not trained to interpret discrimination law, assess program accessibility, or respond to civil-rights findings.

- Higher audit and enforcement risk: Federal agencies expect civil-rights compliance to be overseen by an independent authority, not embedded within fiscal operations.
- Reduced credibility with affected communities: Civil-rights compliance does not appear to be a substantive accountability function.

### **Option C: Move the function to the Clerk of the Circuit Court's Finance Division**

- **Benefits**
  - Proximity to Single Audit execution and documentation: The Clerk's staff plays an important role in financial reporting for federal grants.
  - Clear visibility into audit findings and corrective action timelines.
- **Drawbacks**
  - Not an executive compliance function: The Clerk's role is audit and record-keeping, not policy enforcement or compliance leadership.
  - Reactive rather than preventive: Focused on documenting issues after the fact, not ensuring compliance upfront.
  - Blurs accountability: Compliance responsibility shifts from management to an independent constitutional officer,.

### **Option D: Move the function to County Administration**

- **Benefits**
  - Elevated executive visibility: Direct access to the County Administrator can accelerate corrective action and strengthen accountability across departments.
  - Enterprise-wide authority: County Administration has cross-department coordination authority that can improve standardization of policies, monitoring protocols, and training requirements across all federally funded departments.
  - Potential for improved corrective action enforcement: County Administration has more leverage to require departments to implement corrective actions quickly, particularly where findings involve leadership decisions or systemic policy issues.
- **Drawbacks**
  - Risk to functional independence: If the same executive chain that manages grant-funded programs also oversees civil-rights compliance determinations, auditors may question separation of duties.
  - Possible dilution of subject-matter expertise: If the function is absorbed into general administration without preserving dedicated expertise, it may

shift toward deadline tracking and form submission rather than substantive compliance oversight.

- Public perception of reduced independence: A civil-rights function located within County Administration may be perceived as less independent from executive leadership, particularly when handling complaints or accessibility issues.

### ***Program Reduction***

The program scales to meet demand within the framework of the existing OHR responsibilities around Title VI and Section 504 and therefore is assigned to staff with other duties. Reducing investment in the function isn't possible incrementally and would not change the demand for services.

### ***Program Elimination***

Currently, eliminating Federal Grant Civil-Rights Compliance is not possible because it is a requirement for funding. With more than \$873 million in grants currently under management, it would be prudent to continue conducting this work.

## Harassment Training & Investigations

### Program Purpose, Authority, & Customers

This section covers harassment training and investigations as it relates to internal employees covered under the County's [Anti-Harassment Policy](#). Complaints and investigations for employment discrimination outside of those employed by Pinellas County are discussed in the FEPA section of this report and are governed by Chapter 70 of the Pinellas County Code of Ordinances. While these internal functions are covered under the County's policy, this program also satisfies requirements for some granting agencies as well. Within Pinellas County, this function is situated within the Office of Human Rights (OHR) as part of its broader role in ensuring compliance with civil rights protections and promoting equitable workplace practices.

#### *Harassment Investigations*

The purpose of Pinellas County's Anti-Harassment Policy is to ensure that County employees can work in an environment free from harassment based on protected characteristics defined by the policy. The policy directs County employees to report alleged harassment to the Office of Human Rights (OHR), which is responsible for receiving and investigating internal complaints involving the conduct of other County employees, supervisors, or managers. Allegations are treated as personnel matters, and substantiated violations of the policy may result in disciplinary action, up to and including termination.

The policy also makes clear that utilizing OHR's internal complaint process does not prevent an employee from filing a complaint with the Florida Commission on Human Relations or the Equal Employment Opportunity Commission (EEOC). In certain circumstances, (e.g., when allegations involve a county commissioner, a constitutional officer, or OHR personnel) the policy requires OHR to forward the complaint directly to the appropriate state or federal agency for investigation rather than handling the matter internally.

Separate from the County's internal policy framework, Chapter 70 of the Pinellas County Code establishes explicit limitations on OHR's authority with respect to employment-discrimination complaints when the County itself is the respondent. Accordingly, the County's Anti-Harassment Policy and Chapter 70 operate in distinct but complementary ways. OHR's role under the Anti-Harassment Policy is limited to internal workplace accountability, with outcomes confined to administrative discipline. In contrast, EEOC investigations operate under state and federal civil rights statutes and may result in external legal remedies, including litigation and monetary penalties, which are beyond the scope of the County's internal disciplinary authority.

The County's anti-harassment program satisfies requirements passed down by federal and state law. Under federal law, the County is subject to the anti-discrimination provisions of Title VII of the Civil Rights Act of 1964, codified at [42 U.S.C. § 2000e-2](#). Title VII prohibits employers from discriminating based on protected classes in any aspect of employment.

Although the statute itself does not prescribe how employers should exercise reasonable care to prevent harassment, investigate complaints, and take corrective action when harassment is found, the EEOC had provided that guidance historically in their “Enforcement Guidance on Harassment in the Workplace” document. However, the [EEOC rescinded that document in January, 2026](#). Regardless of this action, the EEOC indicates that this move does not, “give employers license to engage in unlawful harassment.” It remains to be seen how this will affect organization’s operations as it relates to mitigating harassment within their ranks.

Under Florida law, the Florida Civil Rights Act of 1992, codified in [Chapter 760](#) of the Florida Statutes, makes it unlawful for an employer to discriminate based on a protected class when it comes to employment matters. Similar to federal law, the statute does not dictate how organizations accomplish this objective. However, Florida courts may interpret its coverage and requirements for preventing and addressing these issues to mirror federal standards.

### ***Anti-Harassment Training***

In addition to coordinating investigations of violations of the County’s Anti-Harassment Policy, the Office provides training to ensure employees understand their roles and responsibilities related to harassment prevention and reporting. Such training is a common organizational practice designed to clarify what constitutes harassment, reinforce expected standards of conduct, and reduce the likelihood of inappropriate behavior in the workplace.

### ***Supervisor Anti-Discrimination Training***

In addition to anti-harassment training, OHR provides training for supervisors as part of the County’s supervisory training program. This instruction addresses nondiscriminatory practices in recruitment, hiring, and day-to-day supervisory decision-making. The intent of the training is preventative by helping supervisors understand legal standards and appropriate management practices before issues arise.

The Office also reviews internal complaints alleging discrimination in hiring when current employees believe they were treated unfairly during a selection process. These reviews are administrative in nature and focus on whether County policies and procedures were followed. When allegations potentially fall under external civil-rights jurisdiction, employees retain the option to pursue the matter through the appropriate state or federal agency.

## **Budget, Funding Sources, Staffing, & Performance Metrics**

### ***Budget, Funding Sources, & Staffing***

The anti-harassment program is fully funded by the General Fund. The budgeted cost of this program in FY 26 is shown below and represents about 11.5% of the overall budget:

- Revenues

- \$0
- Expenditures
  - \$172,582
- FTEs
  - 1.15

This is the best approximation of program effort because the County does not break down the OHR section budget into individual programs such as anti-harassment. The County however does charge back non-general fund departments for services provided under this program through the cost allocation plan. While this may not cover the full cost, it reduces the General Fund’s financial burden.

**Performance Metrics**

The Office’s performance measures related to harassment investigations and related training are included below in Table 10.

Table 10. *Performance Metrics for this Program*

| Performance Metric   | FY 2022 Actual | FY 2023 Actual | FY 2024 Actual | FY 2025 Actual | FY 2026 Budget  |
|--|----------------|----------------|----------------|----------------|-----------------|
| Number of harassment cases investigated                      | 23             | 14             | 12             | 9              | 5 (YTD)         |
| Number of FTEs working on investigations <sup>1</sup>        | 2              | 2              | 2              | 2              | 2               |
| Average number of cases per FTE                              | 11.5           | 7.0            | 6.0            | 4.5            | 2.5 (YTD)       |
| Average time to complete investigations (in Days)            | 54             | 55             | 52             | 58             | N/A             |
| Number of harassment and Bootcamp training sessions provided | 397            | 18             | 183            | 91             | 3 <sup>2</sup>  |
| Total number of people trained                               | 1,225          | 349            | 259            | 358            | 50 <sup>3</sup> |

<sup>1</sup>While the table shows two FTEs working on investigation, this includes time related to three different positions depending on the case including the Director, Equal Opportunity Coordinator 2/Investigator and if necessary, and the Compliance Manager.

<sup>2</sup>Two scheduled Anti-Harassment classes and 1 Boot Camp class (already completed). Does not include additional Boot Camp sessions or any departmental requests (Tax Collector’s Office stated they plan to do in-person classes this year).

<sup>3</sup>The number of people trained to date does not include the two scheduled Anti-Harassment classes, Boot Camp, or departmental requests.

As shown in Table 10, both the number of harassment investigations and the number of training sessions provided declined between FY 22 and FY 25. However, the large amounts of investigations in FY 22 were from a large issue in one department. Due to that issue, OHR provided additional training sessions to that department in that year. The result was a decline in harassment claims and investigations. Additionally, over the last five years, the average time to complete investigations has remained relatively stable, ranging between approximately 52 and 58 days.

While the number of investigations has declined in recent years, the Office currently maintains approximately two FTEs with investigation responsibilities. At current volumes, the average caseload per investigator is relatively low; however, harassment investigations can fluctuate significantly based on workplace conditions and individual complaints. Maintaining some level of investigative capacity allows the County to respond quickly to spikes in complaints or complex cases without creating delays in investigations.

In addition to investigative work, the Office continues to support harassment prevention through employee training. A significant portion of training is delivered through Click2Learn. Click2Learn is a platform administered by HR, which allows the County to prerecord training and have it available to staff at any time. This helps the Office to reach a larger number of employees in a more efficient manner.

### Duplication or Overlap Analysis

While the Pinellas County Anti-Harassment Policy assigns responsibility for investigating policy violations to OHR, in many peer organizations these functions are housed within HR departments (see peer comparison below). However, because the Pinellas County HR Department does not currently perform anti-harassment investigations or training, there is no duplication or overlap of services at this time.

### Peer Comparison

Table 11 compares OHR’s anti-harassment program with similar programs in peer counties. Based on the jurisdictions that provided usable data, Pinellas County is tied for the lowest number of FTEs dedicated to anti-harassment programs. While Pinellas currently handles fewer cases than some peers, its investigations are generally completed more quickly than several of those jurisdictions. Like many peers, Pinellas funds this program through the general fund. However, unlike the peers reviewed, which house these functions within Human Resources departments, Pinellas administers the program through the OHR.

Table 11. *Anti-Harassment Policy Peer Comparison*

| County (Link to Policy)                          | Complaints and Investigations Department                    | FTEs           | Annual Cases | Avg. Cases Per FTE | Avg. Time to Close Cases (in Days) | Annual Budget                |
|--|---|----------------|--------------|--------------------|------------------------------------|------------------------------|
| Broward <sup>1</sup>                             | <a href="#">HR - Professional Standards Section</a>         | 4              | N/A          | N/A                | N/A                                | Not broken out. General Fund |
| <a href="#">Hillsborough County</a> <sup>2</sup> | HR and/or Investigative Services Office                     | 3 <sup>3</sup> | 7            | 2.3                | 150 <sup>4</sup>                   | \$585,834. General Fund      |
| <a href="#">Miami-Dade</a>                       | <a href="#">People and Internal Operations - HR - Human</a> | 8 <sup>6</sup> | 200          | 25.00              | 172.69                             | \$1.8 Million. General Fund  |

| County<br>(Link to Policy) | Complaints and<br>Investigations Department                                  | FTEs             | Annual<br>Cases | Avg.<br>Cases<br>Per FTE | Avg. Time to<br>Close Cases<br>(in Days) | Annual Budget                      |
|----------------------------|--|------------------|-----------------|--------------------------|--|------------------------------------|
|                            | <a href="#">Rights and Fair Employment<br/>Division (HRFEP)</a> <sup>5</sup> |                  |                 |                          |  |                                    |
| <a href="#">Palm Beach</a> | <a href="#">HR - Fair Employment<br/>Programs</a>                            | 3.2 <sup>7</sup> | 30              | 9.38                     | 210                                      | Not broken<br>out. General<br>Fund |
| <a href="#">Pasco</a>      | <a href="#">HR - Employee Relations</a>                                      | 2                | 4               | 2.00                     | 30                                       | Not broken<br>out. General<br>Fund |
| <a href="#">Pinellas</a>   | <a href="#">Office of Human Rights</a>                                       | 2                | 9               | 4.50                     | 58                                       | Not broken<br>out. General<br>Fund |
| <a href="#">Sarasota</a>   | <a href="#">HR - EEO Coordinator</a>   | 2                | 4               | 2.00                     | 45 <sup>8</sup>                          | Not broken<br>out. General<br>Fund |

<sup>1</sup>Broward County responded to a public records request but did not provide enough information for comparison. There is also no online link to their current policy. The information provided by public records request indicated this function was in Professional Standards, while their website indicates it is located elsewhere. The County indicated their website was out of date.

<sup>2</sup>The Hillsborough County Board of County Commissioners has a separate policy that governs the behavior of the Board, their aides, and interns of the Board. Additionally, their policy indicates HR is in charge of this program for general staff, but their response indicated the Investigative Services Office was in charge. There was no response for clarification on this matter.

<sup>3</sup>There are more FTEs than this in the division and they take care of more than just internal harassment complaints and investigations.

<sup>4</sup>150 is not their average, but their target in some departments. The County did not provide actual numbers.

<sup>5</sup>While the HRFEP division in Miami-Dade coordinates unlawful harassment complaints and investigations, they mention that some departments like Department of Transportation and Public Works, Office of Civil Rights and Labor Relations Division, intake and investigate complaints of unlawful harassment with guidance from HRFEP when necessary.

<sup>6</sup>While Miami-Dade indicates they have 8 FTEs investigating complaints, they mention that when combined with staff in other departments that investigate harassment complaints with guidance from HRFEP, that total could be around 45 FTEs. There is one additional FTE that focuses only on training and outreach.

<sup>7</sup>The 3.2 FTEs includes three investigators and 0.2 FTE of time from the supervisor. These staff also work on alternative dispute resolution, medical leave guidance, and assist with ADA, so the total FTE count is slightly high for harassment work alone.

<sup>8</sup>Sarasota County tries to finish investigations within 30 days, but complex investigations sometimes take between 45-60 days.

## Organizational Structure Considerations

As mentioned above, OHR is unique in that anti-harassment investigations and training are housed within an office overseen by a board of multiple stakeholders rather than within an HR department reporting to an agency head. While there is no single “correct” organizational placement for these services, the structure selected can influence perceptions of independence, operational efficiency, coordination with employee relations functions, and alignment with peer practices. The following observations outline key advantages and limitations associated with the current OHR-based model.

### ***Advantages of the Current OHR Structure***

- **Perceived Independence and Neutrality**
  - Locating anti-harassment investigations and training within OHR may enhance employee perceptions of independence, fairness, and impartiality. Pinellas County’s HR structure also provides a degree of independence, as HR reports to the Unified Personnel System Board. However, interviews with some staff suggest that OHR is perceived as more independent than HR, which may influence employee comfort in reporting concerns through that office.
- **Clear Separation from Management Functions**
  - Because OHR does not perform traditional HR functions such as hiring, discipline administration, or labor relations, it may be viewed as more insulated from managerial influence, which can increase employee willingness to report concerns.
- **Consistency with OHR’s Civil Rights Expertise**
  - OHR’s broader mission and subject-matter expertise in civil rights and discrimination may support a more legally informed and policy-consistent approach to harassment investigations and training.

### ***Limitations of the Current OHR Structure***

- **Operational Duplication and Fragmentation**
  - In many peer organizations, harassment investigations and training are integrated into HR employee relations functions. Housing these responsibilities in OHR may require additional coordination between OHR and HR compared to more centralized models.
- **Limited Staffing Flexibility**

- With a small number of FTEs dedicated to investigations and training, OHR may have less capacity to absorb fluctuations in case volume or expand proactive training efforts compared to a larger HR department with broader staffing resources. However, OHR indicates that they have the capacity to expand capabilities in this area with current staff if necessary.
- **Separation from Day-to-Day Employee Relations**
  - HR departments typically manage performance issues, workplace conflicts, discipline, and corrective actions. Separating investigations from these functions may limit opportunities for early intervention, informal resolution, or alignment with broader employee relations strategies, including disciplinary follow-up after investigations.

## **Risk Assessment of Program Reorganization, Reduction, or Elimination**

### ***Program Reorganization***

Because the Pinellas County Anti-Harassment Policy explicitly designates OHR as the responsible entity for the anti-harassment program, moving the function would require a change to the policy, most likely transferring responsibilities to HR. Such a transition could create short-term service gaps while processes, staffing, and expertise are reestablished, particularly if additional investigative capacity or specialized training is not provided to the receiving department. Reassignment without corresponding resources could also strain HR's existing workload and affect responsiveness to complaints, possibly resulting in the same impacts identified in the reduction of the program listed below.

Reassignment also raises considerations related to organizational fit and process integrity. Relocating investigations within HR may improve alignment with employee relations activities, but may change perceptions of neutrality, based on current perception.

If the function were moved, the County would need to determine whether investigative staff should transfer with the program. Retaining the responsibility without transferring staff or funding could impair program effectiveness and likely extend investigation and training timelines, while also affecting other HR programs as staff would need to absorb these duties in addition to their existing responsibilities. Conversely, transferring staff could negatively affect OHR's remaining functions, particularly because the current level of effort is less than one full FTE.

Finally, even if the Commission determined that the anti-harassment program should be administered by HR, the department would be required to follow its internal governance and consultation processes prior to implementation. While not mandated, customary practice includes review by the cross-functional team and the Employee Advisory Council, in addition to formal consideration by the Appointing Authority and the Unified Personnel Board (UPB).

***Program Reduction***

Reducing the County's internal anti-harassment investigation and training function would introduce operational, compliance, and organizational risks. From a compliance and risk-management perspective, reduced investigative capacity or delayed response times could increase the likelihood that complaints escalate directly to external agencies such as the EEOC, potentially exposing the County to greater legal, financial, and reputational risk. Inconsistent handling of complaints or diminished access to training may also create employee perceptions of lack of organizational accountability.

Peer comparison indicates the County already operates with relatively limited staffing for this function. Because harassment complaints tend to fluctuate significantly year-to-year, maintaining baseline internal capacity allows the County to respond to surges in activity without delays. Additionally, these staff support multiple related functions, meaning reductions would likely affect service levels beyond harassment prevention and investigation.

***Program Elimination***

Eliminating the County's anti-harassment policy, investigations, and training (including supervisory discrimination training and internal hiring discrimination reviews) would likely create significant legal and financial risk for both the County and its employees. As a recipient of federal funding, the County must maintain nondiscriminatory employment practices and take reasonable steps to prevent and address workplace harassment under applicable civil rights laws and grant assurances. Removing these functions would increase legal exposure by reducing the County's ability to promptly identify and address inappropriate conduct. It would also shift the burden to employees to pursue complaints through state or federal agencies, increasing the time, cost, and complexity required to seek resolution.

Additionally, eliminating the program would likely not produce measurable cost savings. The current level of effort is less than one FTE, meaning staff time would likely be redirected to other OHR duties rather than eliminated.

## Equal Employment Opportunity Plan

This section provides a summary of the County's Equal Employment Opportunity Plan (EEOP) reporting, its purpose, requirements, and comparisons with other jurisdictions.

### Program Purpose, Authority, & Customers

#### *Program Purpose & Authority*

Required reporting of equal employment opportunity information by Pinellas County originates primarily from two federal sources: the U.S. Equal Employment Opportunity Commission (EEOC) and certain federal grant requirements administered by the U.S. Department of Justice (DOJ). The EEOC requires state and local governments with more than 100 employees to submit demographic workforce data every two years. In addition, certain DOJ grant programs require recipients to maintain workforce analyses and related documentation demonstrating compliance with equal employment opportunity requirements. The primary reports prepared by OHR to satisfy these requirements include the EEO-4 Report, the Utilization Report, and the Equal Employment Opportunity Plan (EEOP).

#### EEOC Reporting

The State and Local Government Information Report (EEO-4) is a mandatory biennial workforce data collection administered by the EEOC. The report requires state and local governments with 100 or more employees to submit demographic workforce information using EEOC Form 164, including counts by race/ethnicity, sex, job category, and salary band.

The EEO-4 requirement is authorized under [Section 709\(c\) of Title VII of the Civil Rights Act of 1964 \(42 U.S.C. § 2000e-8\(c\)\)](#) and implemented through EEOC regulations at [29 C.F.R. §§ 1602.30 and 1602.32–1602.37](#). The report is typically collected in even-numbered years based on a workforce snapshot period specified by the EEOC.

Federal regulations also require state and local governments with 15 or more employees to maintain the records necessary to complete an EEO-4 report for at least three years. Jurisdictions that submit an EEO-4 must also retain copies of filed reports for the same period and make them available for EEOC inspection upon request.

Although the EEOC does not impose automatic monetary penalties for failing to submit an EEO-4 report, compliance is enforceable. If an eligible jurisdiction refuses or fails to submit the report, the U.S. Attorney General may seek a court order from a U.S. District Court requiring the jurisdiction to prepare and file the report pursuant to the enforcement authority provided in Title VII.

## DOJ Reporting

Certain Department of Justice grant programs require recipients to maintain documentation demonstrating compliance with equal employment opportunity requirements. The primary mechanisms for meeting these requirements are the Equal Employment Opportunity Plan (EEO Plan) and the Utilization Report, which analyzes an organization's workforce composition and employment practices.

An EEO Plan documents an organization's equal employment policies, procedures, and workforce analyses, including utilization analyses and any steps taken to address identified disparities. The Utilization Report compares internal workforce demographics with relevant labor market data to determine whether women or minorities may be underrepresented in particular job categories. These requirements are grounded in several federal statutes governing justice-related grant programs, including:

- The Omnibus Crime Control and Safe Streets Act of 1968 ([34 U.S.C. §§ 10228](#))
- The Juvenile Justice and Delinquency Prevention Act of 1974 ([34 U.S.C. §§ 11182](#))
- The Victims of Crime Act of 1984 ([34 U.S.C. §§ 20110](#))

The DOJ implements these statutory requirements through regulations in [28 C.F.R. Part 42, Subpart E](#), which establish equal employment opportunity obligations for recipients of covered DOJ financial assistance.

Organizations generally must comply with these requirements when they:

- Receive \$25,000 or more in DOJ funding,
- Employ 50 or more employees, and
- Serve a population with at least 3 percent minority representation.

Under these regulations, recipients must:

- Maintain nondiscriminatory employment practices
- Collect and update workforce demographic data
- Assess potential underrepresentation in the workforce
- Maintain required EEO Plan documentation and certifications
- Respond to DOJ information requests and compliance reviews
- Maintain supporting documentation internally

Failure to comply may result in enforcement actions by the DOJ, including the denial of future grant awards or termination of existing funding ([34 U.S.C. §§ 10222](#)).

Based on the DOJ's response to the County's most recent submission, Pinellas County is currently meeting its EEO Plan obligations. At the time of this report however, the DOJ Office of Civil

Rights has temporarily suspended EEOP submissions, [as noted on its website](#) (March 11, 2025). However, recipients remain responsible for maintaining the underlying analyses and documentation required under federal regulations.

### Other Reporting Requirements

In addition to DOJ grants, OHR reports similar workforce compliance information when requested by other granting agencies. For example, EEOP-type information has been requested for certain Department of Children and Families grants and by the Clerk’s Inspector General’s Office. Other counties report similar requests from the State of Florida for certain grant programs. Table 12 shows the reports described above, which agency requires them, and how often reporting is required.

Table 12. *EEOP Reporting Requirements*

| Report             | Required by?  | Required For?   | Frequency   |
|--------------------|---|---|---|
| EEO-4              | U.S. Equal Employment Opportunity Commission (EEOC)             | State and local governments with 100 or more employees.   | Biennial (Every Two Years).   |
| Utilization Report | U.S. Department of Justice (DOJ), Office for Civil Rights (OCR) | Recipients with 50+ employees and DOJ awards of \$25,000 or more; submission typically required when a single award is \$500,000 or more. | Tied to applicable DOJ grants (maintained on file; submitted when thresholds require).          |
| EEOP               | U.S. Department of Justice (DOJ), Office for Civil Rights (OCR) | Recipients with 50+ employees receiving DOJ funds subject to civil rights provisions (typically awards of \$25,000 or more).              | Maintained on file as a condition of funding; certification submitted as required by the grant. |

*Note.* Reporting requirements for DOJ grants are currently on hold.

### Customers

As described above, the County collects and reports workforce civil-rights compliance information primarily to satisfy EEOC reporting and DOJ grant requirements. The County currently administers 13 DOJ-related grants (including the Edward Byrne Memorial Justice Assistance Grant Program and the DNA Backlog Reduction Program among others), either directly or through pass-through funding from the State of Florida.

The primary institutional customers associated with these programs include law enforcement agencies, courts, prosecutors, forensic laboratories, and other justice-system partners responsible for administering grant-funded activities. The broader beneficiaries include crime victims, individuals involved in the justice system, families and youth affected by crime and substance use, and the general public through improved public safety, system efficiency, and

access to justice-related services. These groups could be indirectly affected if the County declined to participate in these grant programs.

## Budget, Funding Sources, Staffing, & Performance Metrics

The EEOP reporting program is fully funded by the General Fund. The budgeted cost of this program in FY 26 represents about 8% of the overall budget and is shown below:

- Revenues
  - \$0
- Expenditures
  - \$120,057
- FTEs
  - 0.80

Because the County does not break down the OHR section budget into individual programs such as EEOP reporting, this represents the best approximation of program effort.

The County may request indirect cost reimbursement from certain federal grants and does so in some cases. However, no specific report currently indicates whether or how much indirect cost is recovered from DOJ grants, if any. The County is currently evaluating a policy change that would require indirect cost recovery to be requested for all grants. Even if indirect costs were recovered from DOJ grants, they would likely offset only a portion of the administrative costs associated with managing those grants, including EEOP reporting. Any indirect cost recovery would not increase the overall budget but would shift a portion of grant funding from program activities to reimbursement of administrative expenses.

Performance metrics are not included for this function because the workload primarily involves preparing compliance reports rather than delivering direct services.

## Peer Comparison

This section provides information on which department, division, or section completes and submits the EEOP report to the EEOC and Utilization Report to the DOJ (when required) for Pinellas County and its peer jurisdictions.

Table 13. *Peer County Responsibility Comparison for EEOP Reporting Preparation*

| Jurisdiction | Responsible Department/Division/Section   |
|--------------|---|
| Broward      | Human Services Department - Housing Options Solutions and Support Division - Human Rights Section |
| Hillsborough | HR - Employee Organization and Compliance Bureau (Sheriff's Office)                               |

| Jurisdiction | Responsible Department/Division/Section  |
|--------------|--|
| Miami-Dade   | People & Internal Operations Department <sup>1</sup> – Human Resources – Human Rights & Fair Employment Practices Division |
| Palm Beach   | HR – Fair Employment Programs  |
| Pasco        | HR - Employee Relations  |
| Pinellas     | Office of Human Rights   |
| Sarasota     | HR   |

<sup>1</sup>Miami-Dade has a combined department that includes Human Resources with other internal services like facility, construction, fleet, risk management, ADA compliance, real estate, security, and parking.

As shown above, all other peer counties covered in this report perform this function within HR (or a section thereof) except Broward County, which houses this function in their Human Services Department. None of the peers reported the number of FTEs fulfilling this role, nor did they have a separate budget for this program.

## Duplication or Overlap Analysis

Currently, Pinellas County HR is the record keeper for all employment data, including demographics, but both departments work together to prepare information required by agencies like the EEOC and the DOJ. Once all information is obtained, OHR compiles it, ensures accuracy, and submits forms, or confirms requirements have been met to the requesting agency. Currently, there is no overlap in this work.

## Risk Assessment of Program Reorganization, Reduction, or Elimination

### *Program Reorganization*

If responsibility for EEOP reporting were shifted to another department, the option with the greatest functional alignment would be HR, which is where this responsibility typically resides in most peer counties. Certified human resource professionals are generally trained in employment law, workforce analytics, and civil-rights compliance related to hiring, promotion, and employment practices, all of which are closely connected to EEOP reporting.

OHR indicates this workload currently consumes about 0.80 of an FTE annually. Transitioning these responsibilities without transferring staff resources could create reporting delays and increase workload pressures on existing HR employee relations staff. Conversely, transferring one position from OHR to HR could negatively affect other OHR programs because EEOP reporting represents only a portion of that employee’s responsibilities.

### ***Program Reduction***

Reduction of this program is not a practical option given the limited amount of staff time currently required. However, the County could potentially offset some General Fund costs by requesting indirect cost reimbursement associated with DOJ grant reporting requirements, if allowable and if those indirect costs are not already being claimed. Even if indirect cost recovery were pursued, it would likely cover only a portion of the administrative effort associated with EEOP reporting. Additionally, indirect cost reimbursement would not increase overall funding but would instead shift a portion of grant funding from program activities to reimbursement of administrative costs.

### ***Program Elimination***

The DOJ's requirement to periodically submit EEOP documentation is a necessary condition for maintaining the \$3.2 million ([Annual Comprehensive Financial Report for the year ending September 30, 2024; p. 204](#)) in grant funding currently administered by the County. In comparison to the scale of these grant awards, the cost of reporting is relatively modest. Failure to maintain or submit the required documentation (when collection resumes) could place the County at risk of losing current DOJ funding and jeopardize future grant eligibility, with direct implications for the programs and services supported by these funds.

While the formal reporting requirement to the DOJ is currently paused, the County is still required to collect data and demonstrate ongoing civil-rights compliance. Similarly, if the County fails to submit required reports to the EEOC, the U.S. Attorney General may seek a court order requiring the jurisdiction to prepare and file the report.

## PC Council for Persons with Disabilities

### Program Purpose, Authority, & Customers

[Pinellas County Code – Chapter 70, Article V](#) establishes the Council for Persons with Disability. “There is hereby created the County Council for Persons with Disabilities, which shall serve in an advisory capacity to the Board of County Commissioners.” The purpose is articulated as follows: “...to identify problems and recommend solutions relating to accessibility and the provision of services to persons with disabilities.” Ordinance No. 17-10 created the County Council for Persons with Disabilities and describes its purpose, membership, powers, and responsibilities.

The Council consists of 13 members. Members are appointed by the Board of County Commissioners for two- and three-year terms that are staggered to maintain continuity and institutional knowledge, and vacancies are filled by BCC appointment in accordance with County procedures. Seven members must be individually appointed by each member of the Board of County Commissioners, and one member each will be appointed by:

- The board of directors of the Disability Achievement Center
- The board of directors of the Parc Center for Disabilities
- The board of directors of the Florida Gulf Coast Paralyzed Veterans of America
- The board of directors of the Boley Centers
- The board of directors of the Family Network on Disabilities
- The board of directors of the Area Agency on Aging of Pasco-Pinellas, Inc.

The services provided include holding public meetings to discuss issues related to people with disabilities; make recommendations to the BCC and OHR in supporting individuals and the broader community; identify issues relevant to persons with disabilities; review and provide feedback on accessibility in projects (parks, facilities, infrastructure); and be a platform for community engagement and visibility. While not directly the ADA grievance procedure authority, this ordinance formalizes the role of an advisory body focused on accessibility and disability issues, and it explicitly ties the advisory structure to OHR’s administrative support.

The Council addresses a wide variety of different topics that concern people with disabilities for potential action relating to:

- Issues of accessibility to facilities, programs, or services of county government.
- Discrimination due to disability in employment, housing, or places of public accommodations throughout the county.
- Assisting the county in identifying and obtaining grant funding that will provide greater accessibility to all facets of civic life to people with disabilities.
- Assisting the county, and particularly OHR, in providing training, education, and outreach relating to the rights of people with disabilities.

Primary customers of the Council are the BCC and OHR, County departments (policy and project feedback), the disability community and advocacy organizations, and residents seeking a forum for accessibility issues (but not individual grievances).

## **Budget, Funding Sources, Staffing, & Performance Metrics**

### ***Budget & Staffing***

The staff support for the Council takes up about 2% of the workload within the OHR budget (in general fund dollars) for FY 26. The level of effort during that time equates to the following amounts:

- Revenues
  - \$0
- Expenditures
  - \$30,014
- FTEs
  - 0.20

## **Duplication or Overlap Analysis**

There are no functions within the county that duplicate or overlap the Council's function.

## **Peer Comparison**

[Broward County's Advisory Board for Individuals with Disabilities](#) (ABID) is an ordinance-created advisory body appointed by the Board of County Commissioners. ABID advises the Commission on disability-related policy and accessibility issues and serves as a mechanism for community input and early identification of barriers. While advisory in nature, the Board supports ADA Title II compliance by promoting proactive consideration of disability access across County programs and services.

The board is codified in the Broward County Code of Ordinances Chapter 16½ Human Rights, Article VI Advisory Board for Individuals with Disabilities, consisting of Sections 16½-87 through 16½-90. This article establishes the board, its duties, and membership structure. According to that article, the Advisory Board for Individuals with Disabilities must:

1. "Serve in an advisory capacity to the Board of County Commissioners of Broward County regarding matters that pertain to the status and welfare of disabled individuals in Broward County, Florida.
2. "Prepare and submit reports and recommendations to the Board relating to matters that include, but are not limited to, services, activities, and programs for individuals with disabilities.

3. "Formulate and recommend plans, programs, and policies to the Board for the coordination of County governmental activities that directly affect disabled individuals.
4. "Help to solicit, but not accept, appropriations, grants, and funds, at the direction of the Board, to be used for the advancement and general welfare of individuals with disabilities within Broward County.
5. "Prepare and submit an annual report of the Advisory Board to the Board.
6. "Perform other related activities as may be requested from time to time by resolution or ordinance of the Board.
7. "Create and amend, as needed, by-laws by which the Advisory Board shall conduct its business."

The Advisory Board is made up of 18 members, and each Broward County Commissioner appoints two. Members must be permanent residents and registered voters of Broward County and represent organizations or agencies dedicated to the advancement of disabled individuals, or individuals who have demonstrated dedication to the advancement of the disabled. Fifty percent plus one of the members shall either be disabled, "or be a representative of an agency or organization dedicated to the advancement of the physically, mentally, or emotionally disabled."

[Hillsborough County Human Relations Board](#) was established under Ordinance 00-37 and serves a related human relations function. Although not strictly limited to disability issues, the code includes the requirement that "there shall be on the Board at all times, a person with a disability or a person representing persons with disabilities."

[Miami-Dade County's Commission on Disability Issues](#) (CODI) is an ordinance-created advisory body appointed by the Board of County Commissioners. CODI advises the County Commission and County administration on disability-related policy, accessibility, and service-delivery issues, and serves as a formal mechanism for community input from individuals with disabilities, advocates, and service providers. While advisory in nature, the Board supports ADA Title II and Section 504 compliance by promoting early identification of barriers, encouraging inclusive program design, and elevating accessibility concerns before they mature into complaints or enforcement issues.

The Commission on Disability Issues is codified in the Miami-Dade County Code of Ordinances, Chapter 2 (Administration), Article XXXIV (Commission on Disability Issues). The ordinance establishes the Board's purpose, duties, membership structure, and relationship to the Board of County Commissioners. Under this article, the commission is charged with advising County leadership on matters affecting residents with disabilities and recommending strategies to improve accessibility, coordination of services, and compliance with applicable disability-rights laws.

Consistent with its ordinance authority, CODI is responsible for reviewing and making recommendations on County policies, programs, and practices that impact individuals with

disabilities; identifying unmet needs and systemic barriers within County services and facilities; and assisting the County in advancing inclusive planning and service delivery. CODI may prepare and submit reports and recommendations to the Board of County Commissioners and perform related advisory functions as requested by the Commission or County administration. The board receives staff support from the county's ADA Coordinator.

The Commission's membership is designed to reflect the disability community and those with demonstrated expertise or commitment to disability issues. Members are appointed by the Board of County Commissioners and typically include individuals with disabilities, representatives of organizations serving people with disabilities, and community members with relevant professional or advocacy experience. This structure helps ensure that lived experience and subject-matter expertise inform County decision-making related to accessibility and disability inclusion.

In Sarasota County, the [Citizens with Disabilities Advisory Board](#) was established for the purpose of working toward the creation of a barrier-free environment. The function, power, responsibility, and jurisdiction of the board is to study accessibility by persons with disabilities to areas such as sidewalks, buildings, recreational facilities, and parking within the city and to report to and make recommendations to the county commission. The board consists of five members who possess the technical, professional, financial, business, or administrative skills necessary to make recommendations on matters concerning accessibility of people with disabilities.

## **Risk Assessment of Program Reorganization, Reduction, or Elimination**

### ***Program Reorganization***

If ADA functions moved, the Council should move with it, as staff support aligns with the other functions of ADA coordination and compliance.

### ***Program Reduction***

The Council support function is scaled to the work done by the Council and therefore cannot be reduced.

### ***Program Elimination***

There are no statutory requirements for the Council, and the work could be handled by the ADA coordinator, so elimination is possible. This would decrease the amount of community input for disability issues and support for departments in addressing accessibility. Savings would likely be nominal, as some of the issues the Council addresses would likely come directly to the ADA Coordinator.

## Fair Employment Practices Agency (FEPA)

### Program Purpose, Authority, & Customers

#### *Purpose*

The FEPA program provides a qualifying local government the ability to receive complaints, investigate those complaints, determine whether employment discrimination has occurred, and work toward charge resolution in a manner similar to the EEOC. This is notable because filing an employment discrimination complaint, with limited exceptions, is a prerequisite to filing a lawsuit that claims discrimination on the basis of race, religion, sex, national origin, disability, or age (as well as equal pay if the basis for the claim is sex).

With limited exceptions, if an individual fails to file with the EEOC or a local equivalent (FEPA), they generally forfeit the right to file an employment discrimination lawsuit. There are many differing reasons for a local or state agency to decide to take on what is a federal obligation for the EEOC, but reasons tend to include:

- A better understanding of the local environmental factors.
- A belief that the state or local agency can process complaints faster than the EEOC.
- A belief that the local or state agency can provide a higher level of service to involved parties through greater availability and more focused interactions.

In addition to the federal FEPA program, Pinellas County also enforces local fair employment practices at the local level. The main differences between the federal and local programs are that the federal program covers employees of employers that have over 15 employees, while the local program covers employees of employers that have between 5 and 14 employees and is not a prerequisite to being able to bring forward a lawsuit.

#### *Authority*

##### **Federal Program**

Civil Rights Act of 1964, [Title VII, 42 U.S.C. §§ 2000e–2000e-17](#), establishes rules related to employment discrimination for employers of 15 or more employees. As a part of these rules, Section 706 allows for state and local agencies to request that they be designated as a Fair Employment Practice Agency (FEPA). If the designation is granted, the state or local agency has the jurisdiction to process employment discrimination allegations, for a period of 60 days before the EEOC can process the allegations per federal law.

## **Local Program**

Chapter 70 of the Pinellas County Code of ordinances establishes rules related to employment discrimination for employees of employers that have between 5 and 14 employees.

### ***Qualification***

To qualify for the federal designation, a state or local government must have codified a fair employment law "...which makes unlawful employment practices based upon race; color; religion; sex; national origin; disability; genetic information; or pregnancy, childbirth, or related medical conditions" and that has "...established a state or local authority.....that is empowered with respect to employment practices found to be unlawful.....To grant relief from the practice; to seek relief from the practice; or to institute criminal proceedings with respect to the practices."

In addition, the state or local agency must provide information on its organizational structure and the resources available to support fair employment activities.

### ***Work-sharing Agreement***

For the federal program, EEOC and FEPAs typically enter into a work-sharing agreement with intent to "provide individuals with an efficient procedure for obtaining redress for their grievances..." The agreement allows the FEPA to waive the local jurisdictional rights provided by federal law (60-day processing period) and further defines the roles of the FEPA and the EEOC in employment discrimination cases. The agreements also provide reimbursement to FEPAs for cases they intake and transfer to the EEOC, as well as for cases they investigate and resolve internally within defined program parameters.

### ***Customers***

The combined local and federal programs impact employees who work for employers within Pinellas County that have over 5 employees, and the employer of the complainant. Coverage area includes those employees and employers in both incorporated and unincorporated areas.

Residents of the County who do not work in Pinellas County generally are not covered by these programs, however for the federal program (employers with 15 or more employees) OHR can support residents by drafting a non-jurisdictional complaint and deferring the complaint to the EEOC. This approach would typically result in the OHR receiving intake revenues from the EEOC.

## ***Pinellas County***

Chapter 70 of the Pinellas County Code of Ordinances includes language that supports Pinellas County's designation of a FEPA by the EEOC and OHR's enforcement of local employment discrimination. While the State of Florida also has a FEPA, EEOC has chosen to recognize OHR as the local FEPA and has entered into a work-sharing agreement with OHR for complaints generated within Pinellas County.

## **Budget, Funding Sources, Staffing, & Performance Metrics**

### ***Budget***

While a portion of the budget for the County's FEPA program comes from the work-sharing agreement with the EEOC and includes a reimbursement from EEOC for intakes for EEOC charges and resolutions for FEPA cases, most of the costs for both the local and federal programs are covered by the General Fund. Based on a resource breakdown from OHR, the adjusted FY 26 budgeted amount for the FEPA program is shown below. This breakdown represents approximately 18% of the overall office budget.

- Revenues
  - \$25,000
    - While the budgeted amount is \$25,000, the department expects revenue of approximately \$35,000. This is not unusual as the department budgets their best estimation at the time of the budget process, but the federal reimbursement timing and flow of cases eligible for reimbursement is often unpredictable.
- Expenditures
  - \$270,128
- FTEs
  - 1.80

### **Revenue Discussion**

Through its work-sharing agreement with the EEOC, OHR receives partial reimbursement for intaking claims under EEOC jurisdiction that are transferred to the EEOC and for resolving claims within its own jurisdiction. Both reimbursement types are subject to annual caps set by the EEOC. Because reimbursements are paid after work is completed, revenues are not always recorded in the same year as the work occurred. To better understand revenue timing, we compared EEOC annual allocations with actual revenue receipts and charge resolution data. The results are shown below in Table 14.

Table 14. *OHR Revenues Compared to EEOC Allocations FY 18-FY 25*

| Fiscal Year  | EEOC Allocation  | OHR Revenues     | OHR Charges Resolved |
|--------------|------------------|------------------|----------------------|
| FY 18        | \$81,110         | \$0              | 112                  |
| FY 19        | \$88,700         | \$89,480         | 107                  |
| FY 20        | \$90,800         | \$0              | 110                  |
| FY 21        | \$37,000         | \$213,780        | 50                   |
| FY 22        | \$34,650         | \$0              | 40                   |
| FY 23        | \$42,750         | \$77,400         | 45                   |
| FY 24        | \$45,125         | \$46,128         | 50                   |
| FY 25        | \$34,450         | \$34,484         | 40                   |
| <b>Total</b> | <b>\$454,585</b> | <b>\$461,272</b> | <b>551</b>           |

This information shows an average annual EEOC allocation since FY 21 of just under \$39,000, compared to an average of just under \$87,000 for FY 18 through FY 20. To better understand the reasons for this reduction in allocations and related changes in caseload and revenue patterns, an analysis of the factors affecting FEPA revenue was conducted.

Several factors influence the amount of reimbursement that OHR receives from the EEOC. These include the approved reimbursement rates for intakes under EEOC jurisdiction that are transferred to EEOC and charge resolutions completed by OHR, as well as the annual targets established by the EEOC for both activities and the congressional allocation FEPA program, which together determine the maximum funding available in a given year. Actual reimbursement depends on the number of charges resolved by OHR and, in some cases, the performance of other FEPA agencies.

The EEOC currently utilizes a reimbursement rate of \$125 per intake for FEPAs, which represents a 250% increase from the 2010 rate of \$50 (according to an evaluation conducted by the EEOC Office of the Inspector General (OIG) titled *Report 2010-0090AEP – Evaluation of the Management of the EEOC’s State and Local Programs*). This reimbursement applies only when a complaint intake is conducted by the FEPA and the charge is subsequently transferred to the EEOC for investigation, rather than being investigated and resolved by the local agency. Unlike the charge resolution reimbursement, the OIG report did not provide an estimate of the actual cost for FEPAs to conduct intake activities. As a result, there is currently no publicly available estimate of the actual cost incurred by FEPAs to perform intake functions.

According to an evaluation conducted by the EEOC Office of the Inspector General (Report No. 2010-0090AEP, *Evaluation of the Management of the EEOC’s State and Local Programs*), the reimbursement rate in 2010 was \$550 per charge resolution. That report also estimated that

the actual cost for FEPAs to process a charge through resolution was approximately \$3,366 in 2010, suggesting that federal reimbursement covered roughly 16% of the estimated processing cost.

In 2025, the EEOC increased the charge resolution reimbursement rate to \$830, representing an increase of approximately 51% from the 2010 level. While LGS was unable to identify a more recent estimate of the actual cost for FEPAs to resolve charges, applying average annual inflation adjustments from 2011 through 2025 produced an estimated inflation-adjusted cost of approximately \$5,455 per charge resolution. Based on this estimate, the reimbursement-to-cost ratio would remain relatively similar, at approximately 15% in 2025.

It is important to note that this estimate is based on a simplified inflation adjustment applied to the 2010 cost estimate. Because the underlying cost of resolving a charge can vary depending on staffing structures, case complexity, and investigative processes, the actual cost may differ significantly from this estimate.

Annually, the FEPA and EEOC agree on annual targets for the number of charges resolved, which also acts as a cap for the number of resolutions EEOC will reimburse the FEPA for. While the basis for those targets can be related to performance in previous years and estimates for the number of resolutions the FEPA expects to have in a given year, ultimately the overall budget for the FEPA program limits the number of resolutions EEOC can pay out and requires the EEOC to assign targets that balance reimbursements among all FEPAs. Those initial targets can be adjusted up or down later in the year by EEOC as trends in case resolution become apparent.

### **Employment Discrimination Reimbursement & the OHR Annual Budget**

There are substantial limitations on the predictability of reimbursement revenue for any FEPA. The FEPAs cannot control the number of cases that are claimed within their jurisdiction, nor can they predict the performance levels of FEPAs outside of their jurisdiction. Additionally, it should be noted that while charge resolution reimbursement rates and intake rates have increased from 2010 to 2024 by 151% and 250%, respectively, the EEOC budget supporting all State, Local, and Tribal Programs has increased from \$30,000,000 in 2010 to \$31,500,000 in 2024, an increase of just 5%.

We also compared the state and local program budget for EEOC and the charge resolution reimbursement rate amounts during the same period. EEOC does not provide a breakdown of program funding within the overall State and Local program budget, so it is important to note that the intent of this analysis is only to show potential impact to the number of charge resolutions considering the rates have substantially outpaced the number of resolutions.

To understand the potential impact of the minimal increase to the program funding, we took the overall budget for the state and local programs from 2010 to 2024 and divided that

number by the FEPA reimbursement rate for the associated year. To be clear, the outcome is not intended to be the number of possible charge resolutions in a year, as the FEPA program has other expenses beyond charge resolutions. However, charge resolutions do make up the majority of the program expenses, and the result simply provides a high-level idea of the impact that increasing the reimbursement rate while keeping the budget flat may have had on the number of cases the EEOC can fund. The decrease, expressed as a percentage, comes out to a 28% reduction in capacity to fund charge resolutions from 2010 to 2024.

We also looked at EEOC charge resolution data during this period to try and determine if case volume has reduced at a similar rate, offsetting the capacity reduction discussed above. Unfortunately, EEOC does not provide data on state and local charge receipts, however it does provide data from its federally received charges. Again, this is an imperfect method, but one that can help us understand trends related to the number of charges the EEOC receives annually to be resolved. During the same period in which the EEOC's capacity to reimburse dropped by 28%, EEOC charge resolutions declined by only 16%.

Table 15. *Estimate of FEPA Funding Capacity*

| Category                         | FY10         | FY24         | % Change from 2010 |
|----------------------------------|--------------|--------------|--------------------|
| Program Budget                   | \$30,000,000 | \$31,500,000 | 5%                 |
| Per Resolution Reimbursement     | \$550        | \$800        | 45%                |
| Estimate of fundable resolutions | 54,545       | 39,375       | -28%               |
| EEOC Cases Resolved              | 104,999      | 88,531       | -16%               |

### **Performance Metrics**

As identified previously, EEOC does not provide data on FEPA performance at the state or local levels, making direct comparisons difficult. Table 16 includes information on the intakes and closures for OHR from FY 22 to FY 25.

Table 16. *OHR Intakes/Closures*

| Category                                | FY22 | FY23 | FY24 | FY25 | Total |
|---|------|------|------|------|-------|
| Intakes                                 | 61   | 73   | 77   | 61   | 272   |
| EEOC Deferred Intakes <sup>1</sup>      | 2    | 1    | 1    | 10   | 14    |
| Non-Jurisdictional Intakes <sup>2</sup> | 14   | 3    | 21   | 5    | 43    |
| OHR Closures                            | 40   | 45   | 50   | 40   | 175   |

<sup>1</sup>EEOC Deferred Intakes occur when a complaint is made and determined to be warranted but is transferred to EEOC for investigation.

<sup>2</sup>Non-Jurisdictional Intakes occur when a complaint is made but determined to either be untimely or related to an employer that does not meet the threshold for number of employees to be covered.

### Duplication or Overlap Analysis

There is no duplication or internal overlap as OHR is the only entity internal to Pinellas County that is authorized to provide this service based on federal and local law. However, there is external overlap at the state (Florida Commission on Human Relations) and federal (EEOC) levels. Both entities can perform the services, and ultimately EEOC has the responsibility to provide this work.

### Peer Comparison

Of the peer counties selected, Pinellas County is joined by Hillsborough, Miami-Dade, and Palm Beach counties in operating as a FEPA for the EEOC. The remaining counties rely on state or federal agencies for enforcement of federal employment discrimination.

Palm Beach County operates its FEPA out of their Office of Equal Opportunity, which reports to one of five deputy/assistant county administrators. The Equal Employment Division of the Office had an FY 25 budget of \$492,592 in expenditures and \$49,375 in revenues.

Hillsborough County operates its FEPA out of the Equal Opportunity Department. A review of budget information for the department did not specify the resource dedications for the FEPA program and requests for information have not been answered at this time.

Miami-Dade County operates its FEPA out of their Human Resources department, within the shared services division. The Human Resources Department resides within the general government portion of the organization and ultimately reports to the Mayor. A review of budget information for the department did not specify the resource dedications for the FEPA program and requests for information have not been answered at this time.

These three peers, along with Broward County, join Pinellas County in having local employment discrimination laws that cover employees working for employers with 5 to 14 employees (below the 15-employee threshold for federal enforcement).

Table 17. *FEPA Program Peer Comparison*

| Peer County  | FEPA | Local Ordinance Support | Level of Involvement          |
|--------------|------|-------------------------|-------------------------------|
| Broward      | No   | Yes                     | Local Enforcement             |
| Hillsborough | Yes  | Yes                     | Federal and Local Enforcement |
| Miami-Dade   | Yes  | Yes                     | Federal and Local Enforcement |
| Palm Beach   | Yes  | Yes                     | Federal and Local Enforcement |
| Pasco        | No   | No                      | None                          |
| Pinellas     | Yes  | Yes                     | Federal and Local Enforcement |
| Sarasota     | No   | No                      | None                          |

## Risk Assessment of Program Reorganization, Reduction, or Elimination

### ***Program Reorganization***

Reorganization of the federal program is not fully at the discretion of the County Commission. While the County can change the entity authorized to enforce County employment discrimination laws, ultimately the EEOC would need to review the organizational structure and resources allocated to support enforcement.

As discussed in further detail in the FHAP section of the report, keeping all anti-discrimination enforcement together in a departmental transfer is not possible because the FHAP program requirement for it to be 20% of the agency expenditures when the agency that does performs other types of anti-discrimination enforcement. Pinellas County currently has no department that could meet that threshold except for OHR.

Transferring employment to another department, either with or without wage theft, is possible with approval from EEOC, however OHR's operating model counts on all investigators in the OHR office investigating all types of anti-discrimination claims (employment, housing, wage theft). Because the FHAP investigators would no longer be available, we believe a drop in efficiency as well as capacity for this group is likely if they are moved.

At this time we would anticipate that at least a similar commitment of resources (\$270,128 and about 1.80 FTEs) would be required by EEOC if the County Commission decided to move this function to another area, which likely means *de minimis* resource savings, and there should be concerns about the efficiency and capacity of this group due to a required split from FHAP.

While the FEPA program could potentially be shifted into a department with the excess capacity to fill the role vacated by FHAP, this would result in better operations rather than monetary savings.

### ***Program Reduction***

Pinellas County could choose to reduce the program by eliminating the local aspect, which covers employees of employers with between 5 and 14 employees. This reduction would not impact revenues or expenditures due to the program overlapping with the federal program. The impact to employees working in Pinellas County for those covered by the local program, as well as their employers, would be that they no longer have a local approach to resolving their complaints. This would not preclude their ability to bring forward a lawsuit, but it would not be investigated by Pinellas County, and the County would not take part in attempts to reconcile the issues, potentially leading to costly litigation for all parties.

If Pinellas County chose to reduce the federal program by reducing resource, it could jeopardize the County's ability to meet the statutory requirements necessary to maintain its FEPA designation and satisfy the requirements of the EEOC work-sharing agreement. The federal guidelines require that a reduction in resources allocated to the FEPA program must be submitted to the EEOC to demonstrate that the new resource levels are sufficient for staffing and maintain organizational capacity to investigate and resolve complaints under the agreement. Based on the current resource allocation, FEPA activities account for approximately 1.80 FTEs of staff time. As a result, reducing staffing capacity could limit the County's ability to meet program expectations and may effectively result in the elimination of the County's FEPA role.

## ***Program Elimination***

### **Federal Program**

If Pinellas County were to discontinue participation in the FEPA program, the State of Florida FEPA and EEOC would determine how to handle added capacity related to federally covered complaints (employers with over 15 employees). If for some reason the FEPA for the State of Florida did not exist at the time Pinellas County discontinued FEPA operations, the only other entity that could legally provide these efforts is the EEOC itself.

As discussed earlier, the perceived value of participating in the federal FEPA program is often based on the belief that it will provide a better understanding of environmental factors, responsiveness with complainant and defendant, and potentially faster processing and resolution times. Unfortunately, the lack of data transparency by the federal government to date limits our ability to test these elements.

While it was earlier identified that filing a claim is a prerequisite for a claimant to file a lawsuit, the federal law has built in timelines (typically 180 days) that limit the effect the pace of an investigation can have. If the investigation has not been completed by that time, claimants can request a right to sue letter and move forward with their personal discrimination lawsuit.

Program elimination would also impact the wage theft and FHAP investigation capacity and efficiency, as these three groups share workloads. As identified earlier in this section, it is difficult to predict the extent of resource reduction on these groups due to the timing of the FHAP estimated FY 26 budget, but we would caution that impacts are likely to occur.

### **Local Program**

The local impact of Pinellas County choosing to eliminate the program means employees of employers with between 5 and 14 employees in Pinellas County would no longer have a local approach to resolving their complaints. In some cases, they could still bring forward a lawsuit,

but it would not be investigated by Pinellas County, and the County would not take part in attempts to reconcile the issues through mediation.

### **Net Impact**

The net savings of program elimination based on the adjustments of the 7102 budget and their impact on 7101's programs is around \$245,000. As discussed in this section, the symbiotic nature of FHAP, FEPA, and wage theft as it relates to investigations likely means that a portion of the savings would be needed to build capacity for any units that remain. However, due to the timing of the FHAP estimated FY 26 budget estimating that impact at this time is not possible.

## Fair Housing Assistance Program (FHAP)

### Program Purpose, Authority, & Customers

#### *Purpose*

FHAP is a federal program authorized by the Fair Housing Act that provides state and local governments with the option to provide enforcement locally for housing discrimination claims, if they can meet program requirements. This program works as a local alternative to filing a complaint with the Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity (FHEO).

Unlike employment discrimination claims, making a fair housing claim with the federal government or designee is not a prerequisite to legal action. In fact, a complainant can take both routes, if desired. Filing with HUD or a participating FHAP agency is generally seen as a lower cost alternative to lawsuits because it is free, and there is an opportunity for a faster adjustment to policies and practices seen as discriminatory so that the complainant might take advantage of available housing opportunities in their area.

Complaints that go through FHEO or the FHAP program work through three stages. Stage one is the receipt of complaints, at which point the FHAP determines if they have jurisdiction to investigate. This includes determining if the complaint is a potential violation of the Fair Housing Act. If it is determined that jurisdiction exists, the FHAP then investigates to determine whether there is evidence that the discriminatory practice outlined in the complaint occurred. During this stage, the FHAP would also work with the parties involved to reach conciliation, a mutually agreeable settlement. If no settlement can be made and evidence supports it, the FHAP can then issue a charge. The Fair Housing Act requires that this investigatory stage is completed within 100 days of when the initial complaint is determined to be a complaint under the jurisdiction of the FHAP.

If a settlement cannot be reached and the investigatory process has resulted in the FHAP determining reasonable cause exists supporting a violation, the FHAP moves forward with adjudication, typically through an administrative law judge or another element of the court system to make a determination of whether a violation did in fact occur. This administrative hearing must take place within 120 days of when a charge is made as part of the investigation process.

While the core programmatic activity for FHAP is reacting to complaints within the jurisdiction, they also typically provide education efforts to proactively combat fair housing discrimination. These efforts are in addition to housing efforts driven by ADA and Title VI and are focused on complaint investigation and resolution for complaints that would otherwise be the jurisdiction of HUD.

While participation in the Fair Housing Assistance Program (FHAP) is not mandatory for local jurisdictions, the program supports enforcement of the federal Fair Housing Act, which establishes protections against housing discrimination. Specifically, [24 C.F.R. Part 115](#) outlines the requirements and standards that state and local agencies must meet in order to participate in the FHAP program.

### **Qualification**

To achieve FHAP certification, local governments must enact housing laws with rights, procedures, remedies, and judicial reviews substantially equivalent to the Fair Housing Act and demonstrate the operational capacity to enforce them. Agencies initially receive an interim certification lasting six months to three years, during which HUD tests their ability to perform. Once the agency performs satisfactorily, it becomes fully certified and enters into a Memorandum of Understanding (MOU) with HUD to codify the official relationship.

### **Pinellas County**

Pinellas County has been certified by HUD based on Chapter 70 of the Pinellas County Code of Ordinances and its administrative structure and has also entered into an MOU with HUD. The MOU was last extended in 2024 and will expire in 2029. Pinellas County also provides some additional protections at the local level through its enforcement of the discrimination based on sexual orientation, which is not covered by federal law.

## **Budget, Funding Sources, Staffing, & Performance Metrics**

### ***Budget & Staffing***

The FHAP program is supported through the Fair Housing Assistance Program budget (7102). Through discussions with the OHR leadership, it was determined that the expenditure allocation currently budgeted to the 7102 program needs to be recalibrated based on current workload. In support of this, the new director of OHR has been working to estimate the level of effort required for FHAP to adjust the FY 27 resource allocations.

It is important to note that while OHR is making efforts to adjust their budget based on the actual level of effort of the program, neither OHR nor the BOCC can reduce the actual resources allocated to the FHAP program without coordinating with HUD.

In addition to the HUD sign off, the HUD grant also requires OHR to maintain the 7102 program expenditures at least 20% of the overall OHR budget. This requirement is linked to the fact that OHR enforces and administers anti-discrimination laws other than those supported by

HUD. Based on the estimated FY 27 allocation, 7102 will meet that requirement, as it will represent 28% of the OHR expenditures in the new budget.

Regardless of the federal requirements involved with adjusting the budget, we believe that utilizing the anticipated expenditure budget for 7102 will provide a more realistic view of the FHAP program for purposes of this review. Therefore the new estimated level of effort has been applied to the FY 26 budget amounts and those are shown below to illustrate the current level of effort based on the entire department budget.

- Revenues
  - \$150,000
- Expenditures
  - \$420,199
- FTEs
  - 2.80

The estimated revenue gap of \$270,199 is supported by the County’s General Fund.

**Funding Sources**

The FHAP program operates on a reimbursement-based funding model. While the program is initially funded through the County’s General Fund, HUD provides a non-competitive FHAP grant that reimburses OHR for specific activities performed during the performance period. Most grant funds are disbursed based on completed investigative and case resolution activities, with reimbursement levels varying depending on the type of work performed. As a result, while grant funding is allocated to OHR through the FHAP agreement, the amount ultimately received depends on program performance and the number and type of eligible activities completed.

Table 18 includes the case processing payment schedule for HUD in FY 24 from the FHAP 2024 handbook. During the program year, OHR is required to submit activities and is then distributed grant funding based on this schedule.

Table 18. *HUD FY2024 Case Processing Payment Schedule*

| Case Disposition                    | FY24 Payment Amount   |
|-------------------------------------|---|
| Full Investigation Cause/No Cause   | \$3,200   |
| Effective Conciliation <sup>1</sup> | \$3,400   |
| Administrative Closures             | \$1,600   |
| Withdrawal with Resolution          | \$1,600   |
| Post-Cause Enforcement Payment      | \$5,000 (administrative hearing held)<br>\$8,000 (civil action filed) |

<sup>1</sup>An effective conciliation is one that provides both substantive individual relief for the complainant together with meaningful and effective public interest relief. Substantive individual relief includes both

monetary relief and other affirmative relief required to make the complainant whole (e.g., approval or restoration of a housing opportunity, approval of a reasonable accommodation or reasonable modification request). The monetary relief afforded to the complainant should not be de minimis; it should compensate the complainant(s) for the harm alleged and be commensurate with relief obtained in other similar cases.

Between FY 20 and FY 24, HUD allocated an average of \$251,948 annually to OHR, with OHR receiving an average of \$213,570. It is important to note that there is a gap between complaint processing period (July 1 to June 30) and the County's financial reporting based on the fiscal year (October 1 to September 30). This gap can mean that federally funds shown as allocated may not be accessible until the following fiscal year, depending on the timing of complaints. The associated allocation and collection amounts are shown in Table 19.

Table 19. *OHR Revenues Compared to HUD Allocations FY18-FY25*

| Fiscal Year  | HUD Allocation     | OHR Revenues       |
|--------------|--------------------|--------------------|
| FY 20        | \$303,200          | \$163,000          |
| FY 21        | \$207,000          | \$155,000          |
| FY 22        | \$317,440          | \$243,440          |
| FY 23        | \$189,200          | \$249,200          |
| FY 24        | \$242,900          | \$244,409          |
| <b>Total</b> | <b>\$1,259,740</b> | <b>\$1,055,249</b> |

### ***Performance Metrics***

OHR has met HUD performance requirements as part of maintaining the Office's designation as a substantially equivalent agency. Ideally, OHR's performance would be compared directly with other FHAP agencies in Florida and with HUD's Office of Fair Housing and Equal Opportunity (FHAP). While consistent comparative performance data for those individual entities is limited, national and state-level data provide useful context regarding how complaints are processed across the fair housing enforcement system.

As shown in Table 20, FHAP agencies handled most fair housing complaints in the United States between FY 20 and FY 23. During this period, FHAP agencies processed 25,375 complaints (77%), while HUD handled 7,396 complaints (23%).

Table 20. *Complaint Handling in US by Entity Type FY 20 - FY 23*

| Fiscal Year | FHEO  | FHAP  | Total |
|-------------|-------|-------|-------|
| FY 20       | 1,696 | 5,879 | 7,575 |
| FY 21       | 2,074 | 6,329 | 8,403 |

| Fiscal Year     | FHEO  | FHAP   | Total  |
|-----------------|-------|--------|--------|
| FY 22           | 1,912 | 6,609  | 8,521  |
| FY 23           | 1,714 | 6,558  | 8,272  |
| Total           | 7,396 | 25,375 | 32,771 |
| % of Complaints | 23%   | 77%    | 100%   |

A similar pattern exists in Florida. Between FY 20 and FY 23, FHAP agencies processed 2,491 complaints (91%), while FHEO processed 233 complaints (9%). This indicates that most fair housing enforcement activity in Florida occurs at the state and local FHAP level rather than directly through FHEO. While this may reflect strong participation in the FHAP program within the state, it also highlights the importance of maintaining sufficient capacity among FHAP agencies. A reduction in local FHAP resources could significantly impact the overall enforcement capacity for fair housing complaints within Florida.

Table 21. *Complaint Handling in Florida by Entity Type FY 20 - FY 23*

| Fiscal Year     | FHEO | FHAP  | Total |
|-----------------|------|-------|-------|
| FY 20           | 80   | 612   | 692   |
| FY 21           | 64   | 637   | 701   |
| FY 22           | 47   | 603   | 650   |
| FY 23           | 42   | 639   | 681   |
| Total           | 233  | 2,491 | 2,724 |
| % of Complaints | 9%   | 91%   | 100%  |

In addition to complaint volume, the data also provides insight into how cases are resolved. HUD and FHAP agencies show different resolution patterns. HUD resolves approximately 60% of complaints investigated through some form of action, such as administrative closure, charge, conciliation, referral to the Department of Justice, or withdrawal with resolution. In contrast, FHAP investigations result in a finding of no cause approximately 57% of the time, with the remaining cases resolved through charges, conciliation, administrative closure, or other outcomes.

Table 22 provides a breakdown of FHEO's case resolution types, while Table 23 provides the same for FHAPs.

Table 22. *FHEO Case Resolution Outcomes*

| Resolution Type        | FY 20 | FY 21 | FY 22 | FY 23 | Total | % of Total |
|------------------------|-------|-------|-------|-------|-------|------------|
| Administrative Closure | 254   | 247   | 249   | 293   | 1,043 | 14.63%     |
| Charged                | 36    | 36    | 21    | 47    | 140   | 1.96%      |
| Conciliated            | 645   | 656   | 557   | 577   | 2,435 | 34.16%     |
| DOJ Closure            | 6     | 0     | 14    | 10    | 30    | 0.42%      |

| Resolution Type           | FY 20 | FY 21 | FY 22 | FY 23 | Total | % of Total |
|---------------------------|-------|-------|-------|-------|-------|------------|
| Withdrawn with Resolution | 143   | 165   | 174   | 562   | 2,859 | 40.11%     |
| No Cause Found            | 744   | 817   | 736   | 562   | 621   | 8.71%      |
| Total                     | 1,828 | 1,921 | 1,751 | 1,628 | 7,128 | 100.00%    |

Table 23. *FHAP Case Resolution Outcomes*

| Resolution Type           | FY 20 | FY 21 | FY 22 | FY 23 | Total  | % of Total |
|---------------------------|-------|-------|-------|-------|--------|------------|
| Administrative Closure    | 514   | 574   | 611   | 774   | 2,473  | 10.56%     |
| Charged                   | 453   | 396   | 470   | 416   | 1,735  | 7.41%      |
| Conciliated               | 1,125 | 1,027 | 1,054 | 1,089 | 4,295  | 18.35%     |
| DOJ Closure               | 0     | 0     | 0     | 0     | 0      | 0.00%      |
| Withdrawn with Resolution | 394   | 391   | 383   | 388   | 1,556  | 6.65%      |
| No Cause Found            | 3,391 | 3,234 | 3,335 | 3,390 | 13,350 | 57.03%     |
| Total                     | 5,877 | 5,622 | 5,853 | 6,057 | 23,403 | 100.00%    |

Additional research is required to fully explain the difference in outcomes between HUD and FHAP agencies. However, information gathered during this project suggests that FHAP agencies may have greater local investigative capacity and familiarity with regional housing conditions, which may allow for more thorough investigations and earlier identification of complaints that do not meet the evidentiary threshold for enforcement.

## Duplication or Overlap Analysis

There is no internal overlap or duplication within Pinellas County. As mentioned previously, Pinellas County does have other fair housing efforts related to grant requirements or compliance; however, the FHAP functions as an official enforcement arm of HUD and is separate from those efforts.

Externally, HUD administers a nonprofit program known as the Fair Housing Initiatives Program (FHIP). However, this program is focused on education, testing properties believed to be carrying out fair housing discrimination practices, preliminary investigations, and supporting private enforcement through funding organizations that assist and represent individuals in private lawsuits related to fair housing discrimination. These entities often refer to potential victims to FHEO or the local FHAP, but they lack the authority to fully enforce the Fair Housing Act.

This is important because the timelines associated with investigation (100 days) and administrative action (120 days after investigation) are typically faster than a private lawsuit, and while that faster timeline may not result in a monetary award, it can result in a faster reversal of ongoing discriminatory practices affecting more than just the complainant.

## Peer Comparison

Amongst our selected peer comparators, only Broward County and Palm Beach County operate as FHAPs. Table 24 provides a summary of the type of enforcement related support the peers provide; however, it should be noted that (at a minimum) Pinellas County would need to continue to provide resident assistance on intaking and processing fair housing complaints to support compliance with federal grants.

Table 24. *FHAP Peer Comparisons on Programmatic Activities*

| Peer County  | FHAP | Local Ordinance Support | Level of Involvement          |
|--------------|------|-------------------------|-------------------------------|
| Broward      | Yes  | Yes                     | Federal and Local Enforcement |
| Hillsborough | No   | Yes                     | Local Enforcement             |
| Miami-Dade   | No   | Yes                     | Local Enforcement             |
| Palm Beach   | Yes  | Yes                     | Federal and Local Enforcement |
| Pasco        | No   | No                      | Complaint Processing          |
| Pinellas     | Yes  | Yes                     | Federal and Local Enforcement |
| Sarasota     | No   | No                      | Complaint Processing          |

Table 25 provides a funding summary comparison for those peers which run a local FHAP program.

Table 25. *FHAP Peer Comparisons on Funding*

| County     | FY 26 Budget | FY 26 FTEs | FY 24 Revenue | FY 24 HUD Grants | FY 23 HUD Grants |
|------------|--------------|------------|---------------|------------------|------------------|
| Broward    | \$1,538,860  | 11         | \$175,021     | \$213,800        | \$214,800        |
| Palm Beach | \$1,197,508  | N/A        | \$291,800     | \$274,400        | \$332,200        |
| Pinellas   | \$420,199    | 2.80       | \$244,409     | \$242,900        | \$189,200        |

*Note.* FY 26 budget for Pinellas County is based on the updated estimates of workload provided by the Office and does not match the original section budget in the budget book.

## **Risk Assessment of Program Reorganization, Reduction, or Elimination**

### ***Program Reorganization***

#### **Internal Reorganization**

As noted in the budget and staffing portion of this section, moving this function is not entirely at the discretion of BOCC and program eligibility may hinge on decisions related to where other antidiscrimination efforts might be housed. This is due to the aforementioned requirement that 20% of the overall agency budget must be related to enforcement of housing discrimination if the agency is enforcing other discriminatory practices.

OHR's current practice is to have investigators within the department, regardless of specialty, able to investigate any anti-discrimination claim, which appears to provide a higher level of efficiency due to the ebb and flow of the types of discrimination cases (housing, employment, wage theft).

If the FHAP specific resources were shifted to a new department without the other resources for anti-discrimination enforcement, they would not be subject to the 20% of agency budget requirement, however there would be a drop in efficiency during period of reduced complaints and greater strain on capacity during periods of increased complaints. While resources could be added or subtracted to account for this, it is difficult to determine further resource adjustments considering the timing of the proposed changes to the FY 27 budget.

If additional anti-discrimination enforcement resources were shifted to a new department with the FHAP, the FHAP would be subject to the 20% of agency budget requirement. Based on the FY 26 departmental budgets and the FY 27 estimate for the FHAP expenditures, there is no department that could absorb FHAP and still meet the 20% threshold.

Regardless of any changes to the financial resources allocated, the organizational structure would also be considered by HUD in a request to reorganize the FHAP function within the county.

Due to a similarity in customers served and program crossover, Human Services may represent the most logical internal alternative for housing the FHAP program. This structure is similar to the model used by Broward County, where fair housing enforcement is located within a broader human services framework. Potential Benefits of moving this function to human services include increased coordination with social service programs that often serve the same populations affected by housing discrimination and, departmental familiarity with federal programs and grant administration.

However, as stated previously, the timing of the budget adjustments the disassociation from other anti-discrimination enforcement resources will likely impact efficiency and capacity, the latter of which may result in additional future resources.

### ***Subcontracting***

Subcontracting with an outside agency is allowed under 24 CFR § 115 subpart C. Considering the anticipated adjustment to resource allocation for 7102, it is unclear whether HUD would allow that reduced local dedication of resources to occur, only to have the County subcontract the function.

If outsourcing were approved by HUD, Pinellas County would maintain a role, but it would shift to one of compliance, while retaining liability for the operations of its subcontractor. Outsourcing day-to-day operations could potentially be accomplished within the estimated FY 26 resource levels; however, because Pinellas County would not be relieved of its FHAP responsibilities under the Fair Housing Act or the MOU, it would be advisable to retain funding for compliance and oversight of the outside agency.

Considering the estimated general fund funding amount of \$280,000, retaining a dedicated compliance manager would consume approximately half of that amount, and when combined with funding for a third-party provider, would result in *de minimis* savings to the general fund. Assigning compliance responsibilities to an existing resource may be possible; however, careful consideration of that individual's capacity should be a primary focus to ensure proper oversight. That said, we would caution that preparing a subcontracting request would likely require an RFP and a dedicated compliance function for an effort that may not be approved by HUD and could ultimately result in a budget increase.

### ***Program Reduction***

Reducing the program budget below 20% of the overall department budget would be difficult. The FHAP program requires the County to maintain its level of effort, specifically as it relates to resource allocation. When local agencies request a resource reduction, HUD reviews the activities of the FHAP to ensure that the adjusted resource approach can still meet the program requirements – a process that could take between six months and 3 years.

### ***Program Elimination***

Pinellas County could cease participation in the FHAP program and leave enforcement of fair housing discrimination to FHEO and/or the State of Florida FHAP. This allows for the most significant direct savings; however, it is likely to produce a reduced level of service from the current environment for the complainants and/or those accused of violation. Additionally, the sexual orientation element of fair housing discrimination would not be enforced, as that is specific to the Pinellas County program.

Based on the current level of effort, the County could reinvest its \$270,000 general fund contribution to a non-profit organization providing fair housing support. However, these organizations would not have the authority that an FHAP would.

It is unlikely that reinvesting the \$270,000 general fund contribution would be sufficient to fully fund one of these non-profit entities, however as discussed in the overlap portion of this section, there is a competitive federal grant program called FHIP that non-profits can utilize for additional funding. Currently there are six FHIP funded organizations in Florida, none of which are in the Tampa Bay Area. Three of the existing FHIPs overlap service areas with the Broward and Palm Beach County FHAPs. That said, non-profits, whether funded by FHIP or not, lack the enforcement powers of an FHAP or the FHEO.

It is also important to note that FHIP has been a target of potential budget cuts of late, with the FHIP program receiving no funding until the end of the final version of the federal budget was approved in February. Additionally, FHEO was slated for substantial reductions in funding, which were again reinstated at the end of the process. FHAP was untouched during this period, suggesting that the FHAP program may be the preferred method of enforcement for the current administration.

While there is no way to predict if the current federal administration will work towards making substantial changes to the federal funding environment surrounding fair housing, future destabilizations of that environment and shifts toward local enforcement should be considered.

If the County does eliminate the FHAP program, its estimated net savings based on current costs would be around \$270,199 (net). Note, this amount is estimated and actual savings might be lower depending on actual revenue, caseload, and the number of positions that could truly be eliminated. The Office might be able to eliminate about 2.80 FTEs worth of work; however this is likely dependent on the decisions made related to employment and wage theft investigations. Because these investigators operate as a unit, the efficiency and capacity of the remaining units may need reallocation of part of the FTE allocation to operate well.

Overall, it is important to note that the FHAP/FHEO approach is really focused on resolving discriminatory claims quickly so that housing stock is available to all, while to private lawsuit approach is more focused on economic benefit for the aggrieved. An individual can take both approaches, but considering the limited housing options in Pinellas County, there may be value in investing in this program to help open housing slots faster.

## Refueling Assistance Ordinance

### Program Purpose, Authority, & Customers

The purpose of the [Gas Pumping Assistance for Persons With Disabilities Ordinance](#) is to ensure that individuals with physical disabilities have equal access to self-service fueling services at retail gas stations throughout Pinellas County (both incorporated and unincorporated areas). Ordinance 12-38, adopted by the Pinellas County Commission on August 21, 2012 (Code of Ordinances, Section 70-217), requires both full-service and self-service gas stations with two or more employees on duty to post accessibility language and provide refueling assistance upon request to individuals with disabilities.

The ordinance authorizes both the Office of Human Rights (OHR) and the Pinellas County Department of Justice and Consumer Services (now the Office of Consumer Protection [OCP]) to participate in enforcement. In practice, complaints are received and investigated by OHR, while OCP may assist with inspections, warnings, or other compliance efforts when necessary. Penalties under the County code can reach up to \$1,000 per day for a first violation, up to \$5,000 per day for repeat violations, and up to \$15,000 per day for irreparable or irreversible violations. In addition to complaint investigations, OHR conducts compliance monitoring, business outreach, and education for covered fuel retailers regarding their obligations under the ordinance.

At the federal level, similar accessibility principles are addressed through the [Americans with Disabilities Act \(ADA\)](#), which was signed into law on July 26, 1990. [Title III of the ADA](#) prohibits discrimination by places of public accommodation and includes guidance indicating that gas stations should provide refueling assistance at no additional cost to individuals with disabilities when at least two employees are on duty. Federal guidance also recommends signage informing customers that assistance is available. If a business fails to comply with ADA requirements, individuals may pursue legal action seeking injunctive relief to require compliance.

Florida Statutes [§526.141\(5\)](#) address refueling assistance at the state level. The statute requires full-service stations that offer lower-cost self-service fuel to provide refueling assistance to disabled customers upon request when more than one employee is on duty. However, the state indicates that there are no full-service stations currently operating in Florida, meaning the assistance provision is rarely triggered. The statute does require stations to post a 15-inch placard on fueling devices indicating that assistance is available upon request. Enforcement authority is assigned to the Florida Department of Agriculture and Consumer Services. Violations are classified as second-degree misdemeanors, with a general fine cap of \$500 and potential jail exposure of up to 60 days. According to state officials, when complaints are received regarding missing placards, they typically respond within 24–48 hours. However, they do not investigate complaints related to assistance not being provided because the triggering condition (full-service stations offering discounted self-service fuel) does not currently exist in Florida. The state also indicated that they have not received complaints from Pinellas County regarding this issue within at least the last year.

A key distinction among these legal frameworks is that Pinellas County's ordinance applies to self-service gas stations, while the state statute only applies when a full-service station offers lower-priced self-service fuel, which rarely occurs in Florida. Federal ADA guidance focuses on accessibility and nondiscrimination requirements but relies primarily on private enforcement through civil litigation rather than a local complaint investigation process.

The primary beneficiaries of the County ordinance are individuals with physical disabilities who require assistance accessing self-service fueling equipment. Although federal and state law do not require local governments to adopt their own ordinances, the state statute specifically allows cities and counties to enact stricter local requirements. While Pinellas County's provisions are similar in intent to federal and state accessibility guidance, the County ordinance expands coverage to self-service stations, provides a local complaint investigation process, and establishes stronger civil penalties than those available under state law

## **Budget, Funding Sources, Staffing, & Performance Metrics**

### ***Budget, Funding Sources, & Staffing***

The refueling assistance program is expected to account for about 1% of the workload within the OHR budget (in general fund dollars) for FY 26. The level of effort during that time equates to the following amounts:

- Revenues
  - \$0
- Expenditures
  - \$15,007
- FTEs
  - 0.10

### ***Performance Metrics***

Over the last five years the Office has investigated one formal complaint related to the ordinance. That case prompted a broader compliance review and education effort, and the Office is currently preparing an outreach and re-education campaign to ensure that gas stations maintain proper signage and understand their obligations under the ordinance.

When complaints do arise, they are investigated as promptly as possible, with the timeline varying depending on the nature and complexity of the complaint. Straightforward matters such as signage issues, minor operational deficiencies, or cases resolved through compliance education may be addressed within approximately two to four weeks. More complex cases that require inspections, documentation review, multiple site visits, or coordination with other departments may take approximately 30 to 60 days to complete. Investigations may take longer in situations involving ongoing violations, legal review, or lack of cooperation. Factors that can affect the timeline include the availability of evidence and documentation, scheduling of inspections, the

speed at which corrective actions are taken, and the need to coordinate with other entities such as consumer protection or the Florida Department of Agriculture.

### Duplication or Overlap Analysis

Within the County, both OHR and the OCP have roles under the ordinance. OHR serves as the primary intake and investigative authority, while the OCP may assist with inspections, warnings, and compliance outreach when necessary. As a result, responsibilities are complementary rather than duplicative. External to the organization, both the state and federal governments provide similar regulations.

### Peer Comparison

This section will cover comparisons to these other peer counties:

Table 26. *Refueling Assistance Ordinance Peer Comparison*

| County (Link to Policy)             | Complaints and Investigations Department   | FTEs | Annual Cases     | Avg. Time to Close Cases | Annual Budget          |
|-------------------------------------|--|------|------------------|--------------------------|------------------------|
| <a href="#">Broward</a>             | <a href="#">Public Works and Environmental Services - Consumer Protection Division</a> | 0    | 0                | N/A                      | \$0                    |
| <a href="#">Hillsborough County</a> | <a href="#">Regulatory Compliance Section of Code Enforcement</a>                      | 4    | 732 <sup>1</sup> | 15 days                  | \$749,598 <sup>2</sup> |
| <a href="#">Miami-Dade</a>          | <a href="#">Miami-Dade Commission on Human Rights</a>                                  | N/R  | N/R              | N/R                      | N/R                    |
| <a href="#">Palm Beach</a>          | <a href="#">Consumer Affairs Division</a>  | N/R  | N/R              | N/R                      | N/R                    |
| <a href="#">Pasco</a>               | <a href="#">Code Compliance</a>  | N/R  | N/R              | N/R                      | N/R                    |
| <a href="#">Pinellas</a>            | <a href="#">OHR</a>  | 0.04 | 0                | N/A                      | \$6,029                |
| <a href="#">Sarasota</a>            | N/A  | N/A  | N/A              | N/A                      | N/A                    |

Note. N/R = No Response; N/A = Not Applicable

<sup>1</sup>These include re-inspections to determine compliance.

<sup>2</sup>This amount reflects the total Consumer Services team budget.

As shown above, all peer agencies (excluding Sarasota County) have adopted an ordinance that is similar to Pinellas County’s including the requirement for signage, assistance, enforcement, and fees/fines for non-compliance. While most peers did not respond to requests for information, Broward County reported that it has not received any complaints and does not assign dedicated staff to the program. If complaints are received, they are investigated by inspectors assigned to other regulatory areas. The Office also does not maintain a specific budget

for this function. Hillsborough County reported 732 cases in 2025 (including re-inspections). Investigations take about one hour when compliant, with follow-up inspections after a 15-day correction period for non-compliance. No program-specific budget is maintained; the reported \$749,598 reflects the total Consumer Services team budget.

## **Risk Assessment of Program Reorganization, Reduction, or Elimination**

### ***Program Reorganization***

Due to OHR and the Office of Consumer Protection (OCP) both having responsibility for this program as prescribed in Ordinance 70-217, the County could move this program to the OCP. Some peers house this program within their Code Enforcement program, which is another nexus that makes sense for this program. Based on current workload, the County could move this program to another department without impacting services or moving resources.

### ***Program Reduction***

The current program rarely has any workload associated with it. Reduction would likely mean elimination.

### ***Program Elimination***

Neither the federal nor state government requires local governments to maintain a refueling assistance program, and there would be no direct fiscal impact to the County for not providing this service. However, the program is currently mandated by Pinellas County Ordinance 12-38 (Section 70-217), and elimination would require repeal of that ordinance. The annual cost of the program is approximately \$15,007; however, elimination would likely not produce measurable savings because this amount primarily reflects a small portion of existing personnel time (approximately 0.10 FTE) along with minimal variable and fixed overhead costs already absorbed within the Office's budget.

If the program were eliminated, individuals with physical disabilities would need to pursue concerns through state or federal channels. However, the Florida statute primarily addresses signage requirements and assistance obligations tied to full-service stations, which state officials indicate do not currently exist in Florida. As a result, the state generally only investigates placard visibility issues and does not investigate complaints regarding failure to provide assistance. The County ordinance currently allows investigation of both signage and assistance complaints and provides a local enforcement mechanism with civil penalties against the station. Even when the County issues a fine, the penalty is paid to the County rather than the individual. Regardless of the enforcement path, individuals who believe their rights were violated could still pursue legal action under federal law seeking injunctive relief and attorney's fees, but they would need to pursue that remedy independently.

## Wage Theft and Recovery

### Program Purpose, Authority, & Customers

The [Wage Theft and Recovery Ordinance](#), Chapter 70 Article IV of the Pinellas County Code, was passed by the Pinellas County Board of County Commissioners on January 1, 2016. It establishes prohibited labor practices and enforcement authority for the County. It operates alongside federal and state wage protections, including the [Fair Labor Standards Act of 1938 \(FLSA\)](#), which establishes minimum wage and overtime requirements, and the [Florida Minimum Wage Act](#) (Chapter 448, Florida Statutes), which provides additional wage protections under state law. This ordinance provides a local administrative mechanism that complements those broader enforcement frameworks.

The purpose of the Wage Theft Program is to protect workers from the underpayment or nonpayment of earned wages by providing an accessible, local enforcement and recovery process. By addressing wage theft at the local level, the County promotes economic security and dignity for workers, supports fair competition among businesses, and reduces the public burden associated with uncompensated labor that may lead affected workers to rely on public assistance. The ordinance further articulates an intent to promote the general welfare of County residents through ongoing analysis of wage theft trends, the effectiveness of regulatory and educational efforts, and the impacts of wage theft on the local economy.

The ordinance establishes parameters for the County's administrative complaint process. Wage theft complaints must fall within a defined claim threshold ranging from \$60 to \$15,000, and the ordinance encourages voluntary mediation between the employer and employee prior to a formal hearing before the Special Magistrate. If a violation is found, the Special Magistrate may order the employer to provide restitution equal to twice the amount of unpaid wages, with additional penalties possible if the employer fails to comply with the order. The ordinance also prohibits retaliation against employees who file or assist with wage theft complaints, helping ensure that workers can pursue wage recovery without fear of adverse action.

Under this structure, OHR provides administrative and logistical support for the adjudication process, including scheduling hearings, preparing draft orders based on the Special Magistrate's announced decisions, maintaining case records, and coordinating payment processing. The Special Magistrate is solely responsible for presiding over hearings, evaluating evidence, making legal determinations, and reviewing and approving final orders. The County retains administrative authority over intake, case assignment, contract renewal, termination, and fiscal oversight, while maintaining the independence of the decision-making function.

The cost to operate the adjudicative component of the Wage Theft Program is relatively limited. The County compensates the Special Magistrate at a flat rate of \$500 per month, with a maximum annual cost of \$6,000 per fiscal year, inclusive of hearings, order review, and post-hearing activities. All other program costs (including staff time for intake, mediation, case preparation, and program administration) are absorbed within OHR's operating budget.

## Budget, Funding Sources, Staffing, & Performance Metrics

### ***Budget & Staffing***

The Wage Theft Program consumes about 11.5% of the workload within the OHR budget. The level of effort during that time equates to the following amounts:

- Revenues
  - \$0 (\$35 in FY 25 was the only revenue for the last four years)
- Expenditures
  - \$172,582
    - A small portion (\$5,778 is annual contract for special magistrate including mediation services).
- FTEs
  - 1.15

While the ordinance allows the Office to recover "administrative" costs in cases in which the employer is found to have violated the ordinance, the Office has historically interpreted this to include only limited costs, such as postage. The Office is currently evaluating whether additional administrative costs, such as the Special Magistrate time and staff time involved with case management, could also be recovered under the ordinance. If allowed, this could increase the portion of program costs paid by those found in violation instead of relying entirely on the general fund for support. The Office does not currently track program costs in a way that would allow it to estimate how much could potentially be recovered through these cases. In addition, there is a focus on mediation before a case is heard by a special magistrate, which, while good for both parties, limits potential revenue from recovered administrative costs.

### ***Performance Metrics***

The performance metrics for the Wage Theft Program are included below. Based on these data, the number of individuals requesting this service has increased in recent years, and if the current trend continues, the Office may see the highest caseload in the past five years, with approximately 156 cases.

It is also important to note that the total amount of wages claimed is consistently higher than the amount recovered. This difference does not reflect OHR's performance; rather, it reflects that some claimants are unable to substantiate their claims, or the Special Magistrate determines that wages are not legally owed based on the facts presented. While the Office has a target of 90 days to complete investigations, it does not collect the actual elapsed time.

Table 27. *Performance Metrics for the Wage Theft Program*

| Performance Metric                               | 2022 Actual  | 2023 Actual  | 2024 Actual  | 2025 Actual  | YTD 2026 Actual (1/1/2026 to 3/4/2026) |
|--|--------------|--------------|--------------|--------------|--|
| # of Cases                                       | 70           | 136          | 141          | 130          | 27 <sup>1</sup>                        |
| # of Judgements / Final Orders                   | 11           | 25           | 29           | 32           | 7                                      |
| Amount in Judgements / Final Orders <sup>2</sup> | \$39,136.64  | \$99,373.42  | \$60,274.06  | \$140,876.26 | \$19,177.52                            |
| Amount of Wages Claimed                          | \$144,692.29 | \$286,149.03 | \$261,753.10 | \$292,446.10 | \$90,675.48                            |
| Amount in Wages Recovered <sup>2</sup>           | \$47,529.55  | \$56,905.77  | \$81,686.86  | \$90,280.67  | \$18,829.34                            |
| FTEs   | 1.82         | 1.72         | 1.37         | 1.37         | 1.37                                   |

*Note.* The information above is by calendar year, not fiscal year.

<sup>1</sup>Based on 27 cases at this point in the year, the Office would expect to hear about 156 cases if the same pace continues.

<sup>2</sup>Amount in Judgements/Final Orders is usually less than the amount of wages recovered because this amount is only related to decisions made by the Special Magistrate, whereas the amount of wages recovered can also include mediation, settlements, and/or hearing resolutions as well. The amount recovered in wages may be less due to the timing in which wages were actually paid back.

## Duplication or Overlap Analysis

The Wage Theft and Recovery Ordinance assigns primary administrative responsibility for the program to the Pinellas County Office of Human Rights (OHR). Based on the ordinance structure, OHR is responsible for complaint intake, mediation efforts, case administration, and coordination of hearings before the Special Magistrate. The ordinance does not identify any other County departments as having operational responsibilities within the program.

## Peer Comparison

This section will cover comparisons to these other peer counties:

Table 28. *Wage Theft and Recovery Peer Comparison*

| County<br>(Link to<br>Policy)           | Complaints and<br>Investigations<br>Department                                 | FTEs | Annual<br>Cases | # of<br>Judgements | Avg. Time<br>to Close<br>Cases | \$ Wages<br>Claimed/<br>Recovered | Annual<br>Budget       |
|---|--|------|-----------------|--------------------|--------------------------------|-----------------------------------|------------------------|
| <a href="#">Broward</a>                 | <a href="#">Office of Intergovernmental Affairs and Professional Standards</a> | N/R  | N/R             | N/R                | N/R                            | N/R                               | N/R                    |
| <a href="#">Hillsborough</a>            | <a href="#">Code Enforcement - Regulatory Compliance Office</a>                | 4    | 133             | 0                  | 35 days                        | N/A <sup>1</sup><br>/\$118,686.29 | \$749,598 <sup>2</sup> |
| <a href="#">Miami-Dade</a>              | <a href="#">Regulatory and Economic Resources</a>                              | N/R  | N/R             | N/R                | N/R                            | N/R                               | N/R                    |
| <a href="#">Palm Beach</a> <sup>3</sup> | <a href="#">Outsourced to Legal Aid Society of PB</a>                          | N/A  | 128             | 6                  | Under 23<br>days               | \$337,028<br>/\$66,582            | \$145,333              |
| Pasco <sup>4</sup>                      | N/A  | N/A  | N/A             |                    | N/A                            |                                   | N/A                    |
| <a href="#">Pinellas</a>                | <a href="#">Office of Human Rights</a>   | 1.37 | 130             | 32                 | 90 days                        | \$292,446.10<br>/\$90,280.67      | \$204,810              |
| Sarasota <sup>4</sup>                   | N/A  | N/A  | N/A             |                    | N/A                            |                                   | N/A                    |

Note. N/A = Not Applicable; N/R = Not Response

<sup>1</sup>Hillsborough does not track total amount of wages claimed.

<sup>2</sup>This amount reflects the total Consumer Services team budget.

<sup>3</sup>Palm Beach does not have an ordinance but there is a resolution (R-2012-1857) to contract services with the Legal Aid Society of Palm Beach County to provide services for the Wage Dispute Project.

<sup>4</sup>Neither Pasco nor Sarasota Counties have adopted wage theft ordinances.

Information obtained from peer jurisdictions regarding wage theft enforcement was limited because most counties did not respond to requests for data before the preparation of this report. Based on the information that was available, program structures vary among peer jurisdictions. Several counties appear to house wage theft enforcement within regulatory or compliance functions such as code enforcement or regulatory services. Palm Beach County uses a different approach by contracting with the Legal Aid Society of Palm Beach County to administer its wage dispute program. In contrast, Pinellas County administers the program internally through the Office of Human Rights. Pasco and Sarasota Counties have not adopted wage theft ordinances and therefore do not operate comparable programs. As a result of the limited peer responses, direct comparisons of program performance, staffing, and budgets across jurisdictions were not possible.

## **Risk Assessment of Program Reorganization, Reduction, or Elimination**

### ***Program Reorganization***

The Wage Theft Program could potentially be reassigned to another County department with regulatory or compliance functions. Based on the structure used by peer counties, potential alternatives in Pinellas County could include departments such as Consumer Protection, Code Enforcement, or a regulatory function within Economic Development or Business Services. These departments routinely oversee business compliance programs and employ staff experienced in complaint intake, investigations, and regulatory enforcement, which are functions similar to those currently performed by OHR.

If reassigned internally, responsibilities such as intake, investigation, mediation, and case administration could be integrated into the receiving department's existing compliance operations while continuing to utilize a Special Magistrate for adjudication. However, the workload associated with the program (currently estimated at approximately 1.37 FTEs) would need to be addressed. This could involve transferring equivalent staffing resources from OHR to the receiving department or requiring the receiving department to absorb the workload within its existing staff.

Absorbing the work without additional resources would likely reduce the level of service provided for wage theft cases and could negatively impact the performance of other programs within the receiving department. As a result, relocating the function would likely shift administrative responsibility but would not be expected to produce meaningful cost savings unless the County also reduces the scope or service level of the program.

Another alternative would be outsourcing program administration, similar to Palm Beach County's model in which wage dispute services are provided through a contract with the Legal Aid Society of Palm Beach County. Under this model, the County would fund a nonprofit legal services provider—similar to Palm Beach County's current contract with the Legal Aid Society, which costs \$145,333 annually—to intake complaints, provide mediation, and assist workers with wage recovery. This approach could reduce the County's direct administrative role while maintaining some level of service for workers, although program priorities, case selection, and enforcement mechanisms would be subject to the structure of the service contract and available funding.

### ***Program Reduction***

Reducing the Wage Theft Program would likely involve limiting intake capacity, reducing mediation efforts, or increasing the threshold for cases accepted by the County. While this approach could lower staff workload, it would also reduce access to the program for workers experiencing wage theft, particularly those with smaller claims near the ordinance minimum of \$60. These individuals are often employed in low-wage industries such as hospitality, construction, food service, and domestic work, where the cost of hiring private legal

representation would typically exceed the value of the claim. As a result, some workers may choose not to pursue recovery at all.

Operationally, reducing the program would also diminish the County's ability to resolve disputes through mediation prior to hearing. The current mediation emphasis allows some claims to be resolved without the time and cost associated with formal hearings. A reduction in investigative or mediation capacity could therefore increase unresolved disputes, potentially shifting enforcement to private litigation or federal agencies that typically have longer processing timelines and less focus on smaller wage disputes.

### ***Program Elimination***

While elimination could theoretically remove up to 1.37 FTEs of workload associated with the program, the full \$211,018 in estimated expenditures may not be fully recoverable because much of this cost reflects staff time embedded within broader OHR operations rather than standalone positions dedicated exclusively to wage theft enforcement. The only direct contractual cost that would clearly be eliminated is the Special Magistrate contract (approximately \$6,000 annually).

Eliminating the Wage Theft Program would require repeal of Chapter 70, Article IV of the Pinellas County Code. If the ordinance were repealed, workers would no longer have access to a local administrative forum for wage disputes and would instead need to pursue recovery through federal enforcement or through the court system. Complaints could be filed with the U.S. Department of Labor Wage and Hour Division; however, federal jurisdiction is generally applied only when a business has an annual revenue of at least \$500,000 in annual revenue and is engaged in interstate commerce. Claims that fall outside those parameters are typically referred to the courts.

Florida does not maintain a state wage enforcement agency, so many disputes must be pursued through civil litigation or small claims court. This process requires individuals to prepare filings, potentially pay court fees (unless waived through indigent status), appear in court, and cases may take significantly longer to resolve than the County's administrative process. If the claim is under \$8,000 and the individual files in small claims court, the cost to pursue the case could range from roughly \$250 to \$5,000 depending on the claim amount and whether an attorney is retained. In practice, many attorneys decline smaller wage theft cases because legal fees may exceed the value of the wages being claimed.

From a community impact perspective, elimination would most directly affect low-income workers and individuals with smaller wage claims who rely on the County's free administrative process. Without the program, workers owed relatively small amounts of unpaid wages may face practical barriers to recovery due to jurisdictional limitations, court costs, and longer resolution timelines, which could result in a higher number of unresolved wage disputes.

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## Conclusion

This report was prepared to provide Pinellas County with a clear overview of the programs currently administered by the Office of Human Rights, including the legal authority supporting each program, the resources required to administer them, how similar functions are structured in peer jurisdictions, and the potential impacts associated with program reorganization, reduction, or elimination. As noted throughout this report, the intent of the study was not to recommend specific organizational or policy changes, but rather to provide information that can support future policy discussions and decision-making related to funding, program priorities, and organizational structure.

The analysis demonstrates that the Office of Human Rights administers a combination of federally required compliance functions, locally adopted ordinances, and policy-driven programs intended to support equitable access to County services and protections for residents. The level of regulatory risk, customer impact, and financial implications associated with these programs varies significantly, and the information presented in this report is intended to help the County better understand those differences as it considers future options.

Local Government Solutions would like to thank the leadership and staff of the Office of Human Rights, as well as the many County departments that contributed information during this review. Staff were consistently responsive, transparent, and collaborative in providing data, explaining program operations, and helping ensure that the analysis accurately reflects current practices.

It is our hope that the information contained in this report provides the Board of County Commissioners and County leadership with a useful framework for evaluating the role of these programs within the broader civil rights, compliance, and service delivery structure of Pinellas County.

## Appendix A – Program Customer, Requirement, and Financial Overview

| Program  | Customers<br>(Internal or External) | Required by |       |        | Revenue          | Expenditures       | FTEs         |
|--|-------------------------------------|-------------|-------|--------|------------------|--------------------|--------------|
|  |                                     | Federal     | State | County |                  |                    |              |
| ADA Coordinator, Transition Plan, Accommodation, Interpretation WebForms, and Reasonable Accommodation Intake, & ASL | Both                                | Yes         | Yes   | Yes    | \$0              | \$120,057          | 0.80         |
| Title VI Nondiscrimination Compliance including: LanguageLine, & Limited English Proficiency (LEP) Plan <sup>1</sup> | Both                                | Yes         | Yes   | Yes    | \$0              | \$90,043           | 0.60         |
| Federal Grant & Civil Rights Compliance  | Internal                            | Yes         | Yes   | Yes    | \$0              | \$90,043           | 0.60         |
| Anti-Harassment Policy Management  | Internal                            | Yes         | Yes   | Yes    | \$0              | \$172,582          | 1.15         |
| Equal Employment Opportunity Plan Reporting  | Both                                | Yes         | No    | Yes    | \$0              | \$120,057          | 0.80         |
| Pinellas County Council for Persons with Disabilities  | Both                                | No          | No    | Yes    | \$0              | \$30,014           | 0.20         |
| Fair Employment Practices Agency (FEPA)  | External                            | No          | No    | Yes    | \$25,000         | \$270,128          | 1.80         |
| Fair Housing Enforcement (FHAP)  | External                            | No          | No    | Yes    | \$150,000        | \$420,199          | 2.80         |
| Refueling Assistance   | External                            | No          | No    | Yes    | \$0              | \$15,007           | 0.10         |
| Wage Theft and Recovery Program  | External                            | No          | No    | Yes    | \$0              | \$172,582          | 1.15         |
| <b>Total</b>   |                                     |             |       |        | <b>\$175,000</b> | <b>\$1,500,710</b> | <b>10.00</b> |

*Note.* FY 26 budget amounts reflect estimated staff effort by program. Because staff work across multiple programs, eliminating a single program may not result in proportional staffing or budget reductions.

<sup>1</sup>While the County is required to provide meaningful access to those with disabilities, the specific method is not required.

## Appendix B - High Level Program Comparison

| Program   | Peer Department Comparison |                            |   |                             |                 |                       |
|---|----------------------------|----------------------------|---|-----------------------------|-----------------|-----------------------|
|   | Broward                    | Hillsborough               | Miami-Dade                                | Palm Beach                  | Pasco           | Sarasota              |
| Fair Housing Enforcement (FHAP)   | Human Services Department  | N/A                        | N/A                                       | Office of Equal Opportunity | N/A             | N/A                   |
| Fair Employment Practices Agency (FEPA)   | N/A                        | Office of Community Impact | Human Resources Department <sup>1</sup>   | Office of Equal Opportunity | N/A             | N/A                   |
| ADA Coordinator, Transition Plan, Accommodation, Interpretation WebForms, and Reasonable Accommodation Intake | Human Services Department  | ADA Department             | People and Internal Operations Department | Equal Opportunity Office    | Human Resources | County Administration |
| Pinellas County Council for Persons with Disabilities   | Human Services Department  | ADA Department             | People and Internal Operations Department | N/A                         | N/A             | Human Resources       |

<sup>1</sup>The FEPA investigations for the board occur out of the shared services division of Human Resources.

*Note.* N/A = Service not provided. Highest-level departments shown in most cases; some functions are administered by specialized divisions within those departments.

| Program                                     | Peer Department Comparison          |                            |               |                                      |                 |                       |
|---|-------------------------------------|----------------------------|---------------|--------------------------------------|-----------------|-----------------------|
|   | Broward                             | Hillsborough               | Miami-Dade    | Palm Beach                           | Pasco           | Sarasota              |
| Title VI Nondiscrimination Compliance       | Office of Intergovernmental Affairs | Office of Community Impact | Decentralized | Office of Equal Opportunity          | Decentralized   | County Administration |
| Equal Employment Opportunity Plan Reporting | HR                                  | HR                         | HR            | HR                                   | HR              | HR                    |
| Federal Grant & Civil Rights Compliance     | Human Services Department           | TBD                        | TBD           | TBD                                  | TBD             | County Administration |
| Refueling Assistance                        | Public Works                        | Code Enforcement           | HR            | Consumer Affairs Division            | Code Compliance | N/A                   |
| Wage Theft and Recovery Program             | Office of Intergovernmental Affairs | Code Enforcement           | HR            | Outsource - Legal Aid Society of PBC | N/A             | N/A                   |
| Anti-Harassment Policy Management           | HR                                  | HR                         | HR            | HR                                   | HR              | HR                    |

*Note.* N/A = Service not provided. Highest-level departments shown in most cases; some functions are administered by specialized divisions within those departments.

## Appendix C - Peer Program Funding Comparison

| Program  | Typical Funding in Other Jurisdictions           |
|--|--|
| Fair Housing Enforcement (FHAP) & Fair Employment Practices Agency (FEPA)  | Federal Funds<br>General Fund                    |
| ADA Coordinator, Transition Plan, Accommodation, Interpretation WebForms, Reasonable Accommodation Intake, & ASL Interpretation Services | General Fund                                     |
| Pinellas County Council for Persons with Disabilities  | General Fund                                     |
| Title VI Nondiscrimination Compliance Including Limited English Proficiency (LEP) Plan, LanguageLine                                     | General Fund                                     |
| Equal Employment Opportunity Plan Reporting  | General Fund<br>Indirect Cost Recovery (minimal) |
| Federal Grant & Civil Rights Compliance  | General Fund<br>Indirect Cost Recovery (minimal) |
| Refueling Assistance & Wage Theft and Recovery Program   | General Fund                                     |
| Anti-Harassment Policy Management  | General Fund                                     |