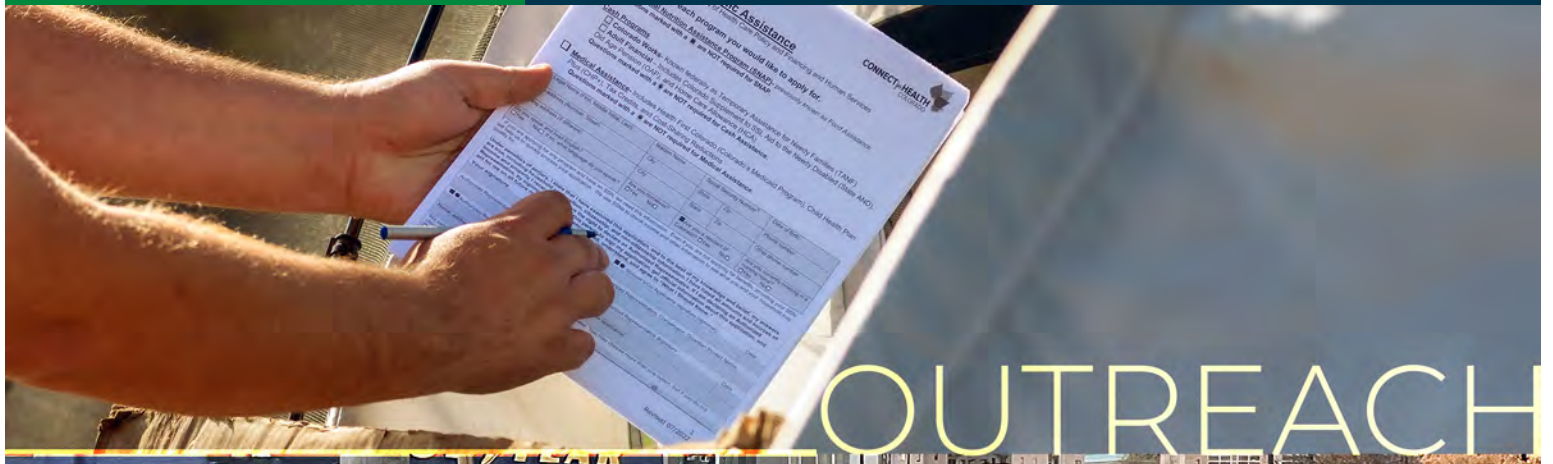


FOLLOW-UP REPORT

Multi-Agency *Homeless Encampments*

MARCH 2025



OUTREACH



ENFORCEMENT



CLEANUP



TIMOTHY M. O'BRIEN, CPA
DENVER AUDITOR

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Cover photos courtesy of the Department of Housing Stability and by Denver Auditor’s Office staff.

City and County of Denver



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AUDITOR'S LETTER

March 6, 2025

In keeping with generally accepted government auditing standards and Auditor's Office policy, as authorized by city ordinance, we have a responsibility to monitor and follow up on audit recommendations to ensure city agencies address audit findings through appropriate corrective action and to aid us in planning future audits.

In April 2023, we audited how city agencies respond to homeless encampments and found risks involving compliance with laws and a legal settlement, equitable access to stored belongings, data input and monitoring, invoice and contract oversight, and encampment expense tracking. The city agreed to implement all 36 of our recommendations.

We recently followed up and found the city fully implemented six recommendations, partially implemented 11, and did not implement another 11 recommendations. I am disappointed that the city has not made much progress in tracking expenses and monitoring contracts related to homeless encampments.

We did not review the eight recommendations related to findings 3 and 4, which centered on the Denver Unauthorized Encampment Response Program and its draft program management plan because the program no longer exists. The program was in place during the previous administration but leaders under the new mayor said the city changed its approach to responding to encampments and people experiencing homelessness by creating a new program — All in Mile High. We plan to audit this new program in the future and will consider the associated risks and recommendations at that time.

Although the city has made some progress, it did not fully address all the risks associated with our original findings. Consequently, we may revisit these risk areas in future audits to ensure the city takes appropriate corrective action.

We appreciate the leaders and team members at the Mayor's Office, City Attorney's Office, Transportation & Infrastructure, Public Health and Environment, Housing Stability, Parks & Recreation, Public Safety, the Denver Police and Fire departments, and Denver Human Services, as well as those at Environmental Hazmat Services Inc. who shared their time and knowledge with us throughout the audit and the follow-up process. Please contact me at 720-913-5000 with any questions.

Denver Auditor's Office

A handwritten signature in black ink, appearing to read "Timothy M. O'Brien".

Timothy M. O'Brien, CPA
Auditor

Homeless Encampments

Original Report Issued:
APRIL 2023

Follow-up Report Issued:
MARCH 2025

Objective

- To determine how well the city's processes for encampment enforcement and the services it provides to people experiencing homelessness at encampments are effective, compliant with laws, and equitable.
- To assess whether the city effectively designed its homeless encampment response program to achieve its mission, goals, and responsibilities.
- To evaluate how well the city tracks spending related to encampments and monitors contractors.

Background

Several city agencies and contracted services providers are involved in responding to homeless encampments in the City and County of Denver. In addition to enforcing city laws and conducting health and safety assessments, the city provides outreach to connect people to services before the city cleans up an encampment site.

The city lacked sufficient procedures and reliable data to ensure people experiencing homelessness who lived in unauthorized encampments were treated equitably and lawfully

- While the city met most requirements overall, it was not fully compliant with a recent settlement agreement that outlined requirements for encampment removal and cleanups.
- The city could not ensure people experiencing homelessness had equitable access to services or to their stored personal belongings.

The city was not tracking expenses related to homeless encampments or sufficiently monitoring invoices and contract performance

- The city did not have a formal process to track costs for homeless encampment-related efforts.
- The city lacked sufficient monitoring over homeless encampment-related contractors.

A draft city plan needed improvement to effectively guide city agencies in their responsibilities over unauthorized encampments

While the city met with stakeholders to discuss program needs, it did not conduct a formal needs assessment or develop policies and procedures for all agencies involved in encampment response, including for enforcement and outreach.

The city's encampment response program may not have been appropriately staffed to achieve its goals and responsibilities

The Mayor's Office had not conducted an analysis to identify the resources needed for the Unauthorized Encampment Response Program.

Why this matters

If city leaders do not adequately track expenses and keep reliable data for the city's activities related to encampment response — including for enforcement, outreach, and cleanup — they cannot assess the effectiveness of their efforts, be transparent with Denver residents, or ensure cleanups are performed equitably and that services are provided to all people experiencing homelessness.



6

FULLY
IMPLEMENTED



11

PARTIALLY
IMPLEMENTED



11

NOT
IMPLEMENTED



8

NOT
REVIEWED

Action since audit report

Homeless Encampments



36 recommendations proposed in April 2023

The city fully implemented six recommendations made in the original audit report. However, the city partially implemented only 11 others and it has not taken steps to address the risks 11 other recommendations had sought to resolve. We did not review eight recommendations associated with findings 3 and 4 because the Unauthorized Encampment Response Program no longer exists.

Regardless of the program no longer existing, the city took steps to implement recommendations originally assigned to the program such as ensuring compliance with the Lyall Settlement — an agreement that outlined requirements for encampment removal and cleanups — by drafting policies and procedures for providing notice at cleanups and before storing personal items, as well as providing employees with homelessness sensitivity training. Furthermore, the city updated its webpage to provide required information to people experiencing homelessness about how and where to pick up their personal belongings. The city also identified a uniform method for tracking encampment response data. Finally, the city will be better able to track encampment-related expenses using a new tag in its financial system of record once agencies identify which expenses to track.



Remaining risks

The 22 recommendations the city did not fully implement present several lingering risks. Among them:

- While the city developed comprehensive policies and procedures for property storage, ensuring compliance with the settlement, and employee training, we found issues with the implementation of the policy in all areas. By not following its own policy, the city risks destroying peoples' property before it is allowed, and staff who work with people experiencing homelessness may not be properly trained.
 - The city has still not identified expenses to track related to encampment response and is still not adequately monitoring contracts or reviewing supporting documentation for invoices. This means the city is not able to be fully transparent about spending for encampment-related efforts and may be paying for services that have not been provided. Without effective contract monitoring, the city may not be ensuring contractors are meeting requirements and that programs are effective.
 - While Mayor's Office staff said they meet with agencies involved in encampment response daily, they have not formally documented their review of outreach, assessment, or cleanup data. Without having a periodic and formalized review process for data accuracy, the Mayor's Office cannot ensure the data it receives is accurate and reliable to use for decision-making and evaluating trends.
 - Additionally, if the city did not consider recommendations related to the Unauthorized Encampment Response Program or its associated draft program management plan when developing and implementing a new program — All in Mile High — the risks we identified in the 2023 audit related to program need, time frames and goals, policies and procedures, and staffing may be present in this new initiative.
-

FINDING 1 | The city lacks sufficient procedures and reliable data to ensure people experiencing homelessness who live in unauthorized encampments are treated equitably and lawfully

The city is mostly, but not fully, compliant with the Lyall Settlement

RECOMMENDATION	IMPLEMENTATION STATUS
1.1 Establish and document roles and responsibilities	● FULLY IMPLEMENTED
1.2 Develop and document policies and procedures for property storage compliance	● PARTIALLY IMPLEMENTED
1.3 Develop and document policies and procedures for property storage data	● PARTIALLY IMPLEMENTED
1.4 Monitor property storage data	● NOT IMPLEMENTED
1.5 Develop and document policies and procedures for providing notice at regular cleanups	● FULLY IMPLEMENTED
1.6 Develop and document policies and procedures for employee training	● FULLY IMPLEMENTED
1.7 Monitor compliance with employee training	● PARTIALLY IMPLEMENTED
1.8 Follow the city’s records retention policy	● FULLY IMPLEMENTED
1.9 Update city webpage	● FULLY IMPLEMENTED

Recommendation 1.1



FULLY IMPLEMENTED

ESTABLISH AND DOCUMENT ROLES AND RESPONSIBILITIES – The Department of Transportation & Infrastructure should establish and document roles and responsibilities – either in a contract or elsewhere – for the department and its contractor to evaluate and dispose of property collected and stored in the city’s storage facility.

Agency’s original target date for completion: June 30, 2023

SUMMARY OF AGENCY ACTION

In April 2024, the city updated its contract with Environmental Hazmat Services Inc. to assign responsibility for maintaining and operating the storage facility to the contractor. It also developed policies and procedures to outline more specific guidelines for property storage and destruction, including what should be documented on property inventory forms. The inventory form requires the name of the Department of Transportation &

Infrastructure staff responsible for approving property destruction. Lastly, the assigned Transportation & Infrastructure staff member is responsible for ensuring the inventory form and a report on property storage and destruction is sent to the director of encampment response or their designee.

Therefore, we consider this recommendation fully implemented.

Recommendation 1.2

DEVELOP AND DOCUMENT POLICIES AND PROCEDURES FOR PROPERTY STORAGE COMPLIANCE

– The Department of Transportation & Infrastructure should work with its contractor to develop policies and procedures for ensuring compliance with the Lyall Settlement regarding property storage and disposal. Policies and procedures should include how and where the department and its contractor will consistently document collection and disposal dates for property as well as when and how property will be disposed of. Transportation & Infrastructure should document a City Attorney’s Office review of the policies and procedures to ensure they comply with legal requirements.



**PARTIALLY
IMPLEMENTED**

Agency’s original target date for completion: June 30, 2023

SUMMARY OF AGENCY ACTION

Mayor’s Office staff provided us with a property storage policy, approved by the City Attorney’s Office in May 2023 that aligns with the Lyall Settlement. For example, both the policy and settlement say property shall be stored for 60 days unless it poses a public health and safety risk. The policy goes above and beyond settlement requirements at times by allowing for storage extensions and outlining requirements for documentation such as photographs of property. It also outlines what should be documented on the inventory forms and requires Transportation & Infrastructure staff to send these forms monthly to the director of encampment response or their designee.

While the policy appears thorough and aligns with the settlement, we found issues with its implementation. For example, the spreadsheet maintained by Environmental Hazmat Services Inc. does not include some elements required by the policy, such as dates when property is allowed to be moved or destroyed and a link to photographs. The spreadsheet is also missing dates for when items were picked up or discarded.

Department of Transportation & Infrastructure leaders said they appreciated us bringing this to their attention and for the opportunity to address discrepancies between the policy and current practices. They acknowledged that there may be some variances between the policy

as drafted and current operations, which could be due to evolving best practices or potential misinterpretation or inconsistent application of policy guidelines. Regardless, by not inputting dates when property can be or was moved or destroyed, as required by the policy, the department and contractors are not taking steps to ensure compliance with the settlement, particularly as it relates to the destruction of property.

Finally, we reviewed a small judgmental sample of four inventory forms and found none matched the example form included in the policy. Additionally, in the instance where someone did pick up their belongings, they did not sign the form as required.

Therefore, we consider this recommendation partially implemented.

Recommendation 1.3

DEVELOP AND DOCUMENT POLICIES AND PROCEDURES FOR PROPERTY STORAGE DATA – The Department of Transportation & Infrastructure should work with its contractor to develop policies and procedures for inputting, tracking, and monitoring property storage data. Transportation & Infrastructure should document a City Attorney’s Office review of the policies and procedures to ensure they comply with legal requirements.



**PARTIALLY
IMPLEMENTED**

Agency’s original target date for completion: June 30, 2023

SUMMARY OF AGENCY ACTION

As mentioned in Recommendation 1.2, Mayor’s Office staff provided us with a property storage policy that had been approved by the City Attorney’s Office. The policy outlines what data should be included in the property storage inventory, such as dates, locations, and descriptions. However, there is nothing in the policy that discusses data monitoring aside from submitting inventory forms and property storage and destruction reports to the director of encampment response.

When asked whether there were additional data monitoring policies and procedures, Mayor’s Office staff said the contract with Environmental Hazmat Services Inc. outlined requirements for data monitoring. However, the contract discusses maintaining and destroying records and not data monitoring.

When reviewing the inventory, we found certain required data elements were missing such as dates when property could be or was destroyed. Furthermore, we found typos in the spreadsheet, which could indicate other issues with data quality.

Therefore, we consider this recommendation partially implemented.

Recommendation 1.4



**NOT
IMPLEMENTED**

MONITOR PROPERTY STORAGE DATA – The Department of Transportation & Infrastructure should periodically monitor property storage data to ensure it supports compliance with legal requirements. It should document these periodic reviews and provide feedback to its contractor, as necessary.

Agency’s original target date for completion: June 30, 2023

SUMMARY OF AGENCY ACTION

Department of Transportation & Infrastructure staff provided us with some evidence to support that they request weekly emails with the property storage spreadsheet and one example where they requested an edit to spreadsheet data.

These emails partially show that the department is ensuring the spreadsheet is provided in a timely manner and to the correct people. But there is nothing to indicate the department is reviewing the spreadsheet for other missing information required by the policy, such as the missing dates discussed in recommendations 1.2 and 1.3. Had the responsible city staff compared the spreadsheet with the policy, they might have identified the discrepancies we found both in the spreadsheet and inventory forms.

Therefore, we consider this recommendation not implemented.

Recommendation 1.5



**FULLY
IMPLEMENTED**

DEVELOP AND DOCUMENT POLICIES AND PROCEDURES FOR PROVIDING NOTICE AT REGULAR CLEANUPS – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop policies and procedures to provide the required 48 hours’ notice for unattended personal property found at its regular citywide cleanups in compliance with the Lyall Settlement. It should also document a City Attorney’s Office review of the policies and procedures to ensure they comply with legal requirements.

Agency’s original target date for completion: June 30, 2023

SUMMARY OF AGENCY ACTION

The Mayor’s Office developed policies and procedures to guide staff when posting 48-hour notices on unattended personal property. The policies and procedures align with the Lyall Settlement and were reviewed by the City Attorney’s Office.

Therefore, we consider this recommendation fully implemented.

Recommendation 1.6



**FULLY
IMPLEMENTED**

DEVELOP AND DOCUMENT POLICIES AND PROCEDURES FOR EMPLOYEE TRAINING

– The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with all agencies responsible for homeless encampment cleanup and response to develop and document policies and procedures for ensuring staff complete required trainings, including those required by the Lyall Settlement.

Agency’s original target date for completion: July 31, 2023

SUMMARY OF AGENCY ACTION

The Mayor’s Office developed and documented policies and procedures for ensuring staff complete required trainings, including those required by the Lyall Settlement. The settlement requires the city to provide annual homeless sensitivity training to all city employees and contractors who will regularly interact with people experiencing homelessness. Mayor’s Office staff provided us with the training records for both city employees and contractors for 2023 and 2024.

Therefore, we consider this recommendation fully implemented.

Recommendation 1.7



**PARTIALLY
IMPLEMENTED**

MONITOR COMPLIANCE WITH EMPLOYEE TRAINING – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with all agencies responsible for homeless encampment cleanup and response to develop and document a process to monitor compliance with employee training requirements, including those required by the Lyall Settlement.

Agency’s original target date for completion: July 31, 2023

SUMMARY OF AGENCY ACTION

The Mayor’s Office developed and documented a process to monitor compliance with training requirements outlined in the Lyall Settlement. As mentioned in Recommendation 1.6, we received the training records for both city employees and contractors for the annual homeless sensitivity training for 2023 and 2024.

We found the city is following its policy because training documentation included all required data fields, such as the name of the employee, date the training was completed, and, if needed, an explanation for why an individual did not complete the training.

However, the city was not validating training records to verify its contractor, Environmental Hazmat Services Inc., was compliant by ensuring staff completed training and that required data fields — such as hire dates — were present in training records.

In December 2024, the city provided us with documentation showing it was working to give contracted staff access to the city’s training application to help monitor training completion.

Therefore, we consider this recommendation partially implemented.

Recommendation 1.8



**FULLY
IMPLEMENTED**

FOLLOW THE CITY’S RECORDS RETENTION POLICY – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with city agencies responsible for providing and monitoring training to ensure compliance with the city’s records retention policy.

Agency’s original target date for completion: July 31, 2023

SUMMARY OF AGENCY ACTION

City agencies must retain training records for six years according to the city’s records retention policy. Mayor’s Office staff provided us with training records from city agencies for 2023 and 2024.

Therefore, we consider this recommendation fully implemented.

Recommendation 1.9



**FULLY
IMPLEMENTED**

UPDATE CITY WEBPAGE – The City Attorney’s Office should work with responsible agencies to ensure the city’s website contains, at a minimum, all information required by the Lyall Settlement and that the information is accurate so people experiencing homelessness can be easily informed of where and how to retrieve their personal belongings.

Agency’s original target date for completion: April 3, 2023

SUMMARY OF AGENCY ACTION

The Lyall Settlement requires the city to create a formal system — such as a webpage — to let people know when unattended personal property has been removed by city employees and contractors and then stored. The city’s webpage was updated to include all information required by the settlement

to help people experiencing homelessness retrieve their belongings. Specifically, it has the following:

- The date unattended property was picked up, location where it was removed from, and the storage facility location.
- Language saying people can pick up their stored property at no cost and without fear of arrest.
- A phone number for individuals to call who may have questions about retrieving their property.
- The location and hours of the storage facility.
- The length and time that property will be stored at the facility before being moved or disposed of.

Therefore, we consider this recommendation fully implemented.

The city cannot ensure equitable access to services or stored personal belongings for people experiencing homelessness

RECOMMENDATION	IMPLEMENTATION STATUS
1.10 Continue developing centralized data tracking	● FULLY IMPLEMENTED
1.11 Identify consistent method for location tracking	● PARTIALLY IMPLEMENTED
1.12 Develop and document policies and procedures for outreach data	● PARTIALLY IMPLEMENTED
1.13 Monitor outreach data	● NOT IMPLEMENTED
1.14 Develop and document policies and procedures for cleanup and assessments data	● PARTIALLY IMPLEMENTED
1.15 Monitor cleanup and assessments data	● NOT IMPLEMENTED
1.16 Conduct a needs assessment	● NOT IMPLEMENTED
1.17 Document long-term property storage process	● PARTIALLY IMPLEMENTED
1.18 Provide equitable access to information	● PARTIALLY IMPLEMENTED
1.19 Provide consistent communication	● PARTIALLY IMPLEMENTED

Recommendation 1.10

CONTINUE DEVELOPING CENTRALIZED DATA TRACKING – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should continue developing a centralized database for the encampment response teams to help provide consistent and centralized data tracking at encampment sites.



**FULLY
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Mayor’s Office staff developed a centralized database for encampment response teams and said it is expected to launch in May 2025.

In response to the recommendation in our original audit report, Mayor’s Office staff said they would develop an application to have all agencies track their efforts in a uniform and consistent manner. However, in October 2024, Mayor’s Office staff said they were now developing a different software application to incorporate 311 complaints.

According to the Mayor’s Office and Technology Services staff, the project began on Nov. 21, 2024. We reviewed the project charter that said the application will track locations, the status of encampments, outreach efforts, and support services. The charter also listed the project team members and said all departments and agencies involved with encampment response will use the application. We also reviewed documentation that outlined the project schedule and measures of success.

Therefore, we consider this recommendation fully implemented.

Recommendation 1.11

IDENTIFY CONSISTENT METHOD FOR LOCATION TRACKING – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with agencies to identify and adopt a consistent method for tracking location data, such as latitude and longitude coordinates.



**PARTIALLY
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

In response to our original audit report, Mayor’s Office staff said they would develop an application to convert location information into latitude and longitude coordinates. In October 2024, Mayor’s Office staff said they are instead developing a different application, and a map using these coordinates already exists within 311.

While Mayor’s Office staff identified a consistent method for tracking location data, it had not been implemented as of Dec. 16, 2024.

The software development process involved staff from each agency that works with encampment response. However, as of Dec. 16, 2024, this software was still in the planning phase and had not been implemented.

Agencies were still using separate location data tracking methods during our follow-up. According to Mayor’s Office staff, they expect the software to launch in May 2025.

Therefore, we find this recommendation is partially implemented.

Recommendation 1.12

DEVELOP AND DOCUMENT POLICIES AND PROCEDURES FOR OUTREACH DATA –

The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop policies and procedures for data input, tracking, and monitoring for outreach data. The policies should include what data should be tracked, such as location, services provided, and demographic information.



**PARTIALLY
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

In our original audit report, we recommended that once the Mayor’s Office implemented a centralized data tracking system for outreach teams as discussed in recommendations 1.10 and 1.11, it should develop policies and procedures for data input, tracking, and monitoring. The system was still in the planning phase as of Dec. 16, 2024. But we did find some outreach teams’ policies and procedures included the elements of our recommendation.

In October 2024, Mayor’s Office staff named nine teams involved in outreach at encampments. One of these teams was a private nonprofit outside of the city, so we only reached out to the other eight teams to request their policies and procedures. We received policies and procedures for three: the Denver Department of Public Health and Environment’s homeless impact team, and the Department of Housing Stability’s Denver street outreach collaborative team and outreach and connections team.

Denver Police Department staff said they did not have policies for their two teams due to legislation restrictions. Department of Parks & Recreation staff said that park rangers do not ask whether someone is experiencing homelessness and therefore do not have outreach specific data. Denver Department of Public Health and Environment staff said the Substance Use Navigators were working on creating procedures for data collection as of Dec. 23, 2024. Finally, Department of Public Safety staff said the street engagement team policies did not discuss data collection elements outlined in the recommendation.

The Department of Housing Stability’s two outreach teams use the state’s Homeless Management Information System and policies and procedures

for data input, tracking, and monitoring. These policies and procedures included all elements of our recommendation, such as locations, services provided, and demographic information.

Similarly, the Denver Department of Public Health and Environment homeless impact team's policies and procedures discussed data, locations, and monitoring responsibilities for outreach. Its policy said teams should track the number of children present, people contacted, and referrals made.

The policies we reviewed for the three outreach teams met our recommendation standards. Therefore, we consider this recommendation partially implemented.

Recommendation 1.13



**NOT
IMPLEMENTED**

MONITOR OUTREACH DATA – The Denver Unauthorized Encampment Response Program coordinated by the Mayor's Office should periodically monitor outreach data to ensure accuracy and identify trends. It should document these periodic reviews and revise policies and procedures as necessary.

Agency's original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Mayor's Office staff said they discuss information from the agencies and outreach teams during a daily meeting. However, they do not document their review or have a policy or procedure on reviewing the information. Mayor's Office staff said implementing the new software application, in line with recommendations 1.10 and 1.11, will help them better review the outreach team data.

While the Mayor's Office is involved in daily meetings about encampment response, these meetings are not documented. Additionally, without having a periodic and formalized review process for data accuracy, the Mayor's Office cannot ensure the data it receives from outreach teams is accurate and reliable to use for decision-making and evaluating trends.

Therefore, we consider this recommendation not implemented.

Recommendation 1.14

DEVELOP AND DOCUMENT POLICIES AND PROCEDURES FOR CLEANUP AND ASSESSMENTS DATA – The Denver Unauthorized Encampment Response Program coordinated by the Mayor's Office should develop policies and procedures for data input, tracking, and monitoring of its cleanup and assessments data.



**PARTIALLY
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

In October 2024, Mayor’s Office staff said they were developing a new software application for agencies to track cleanup and assessments data.

As of Nov. 22, 2024, Mayor’s Office staff said they did not have policies or procedures for the data since the software does not yet exist. In the meantime, we reviewed whether the Department of Transportation & Infrastructure and the Department of Public Health and Environment had sufficient policies and procedures to address our concern about consistent data input, tracking, and monitoring.

Department of Transportation & Infrastructure staff said they did not have policies or procedures for these processes.

Department of Public Health and Environment staff provided us with two policies and procedures that discussed a uniform method for completing, tracking, and monitoring assessments data. We reviewed their 2024 tracking spreadsheet mentioned in their policies and found it contained the data elements required by this recommendation. For example, the policy included detailed instruction for which data fields the investigators needed to input and track. The spreadsheet contained the date, visit type, location, notes, and investigators for encampment visits. Department leaders also identified staff responsible for reviewing all assessments.

Therefore, we consider this recommendation partially implemented.

Recommendation 1.15

MONITOR CLEANUP AND ASSESSMENTS DATA – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should periodically monitor cleanup and assessments data to ensure accuracy. It should document these periodic reviews and revise policies and procedures as necessary.



**NOT
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Mayor’s Office staff said they have several meetings a day with agencies to discuss encampment data. They also said they receive copies of all assessments and cleanup data on a daily or weekly basis. However, they do not document their reviews or have a policy or procedure on reviewing the information.

While we recognize that Mayor’s Office staff regularly receives and discusses cleanup and assessments data, without having a periodic and formalized review process for data accuracy, they cannot ensure the data they receive on cleanups and assessments is accurate and reliable.

Therefore, we consider this recommendation not implemented.

Recommendation 1.16

CONDUCT A NEEDS ASSESSMENT – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should conduct a needs assessment to determine the most appropriate location for one or more property storage facilities as well as appropriate hours of operation to ensure equitable access by people experiencing homelessness. The city should consider transportation needs and options as part of its assessment. The contract with the city’s property storage service provider should be amended as necessary to align with changes to property storage hours and location.



**NOT
IMPLEMENTED**

Agency’s original target date for completion: April 1, 2024

SUMMARY OF AGENCY ACTION

The Mayor’s Office did not conduct a needs assessment to determine whether the location and hours of operations for the storage facility allow for equitable access for people experiencing homelessness to pick up their personal belongings. The office cited the Lyall Settlement as the documentation outlining the days and hours, but the settlement allows the city to change the hours, after consulting with the advisory group, if they document the decision.

Therefore, we consider this recommendation not implemented.

Recommendation 1.17

DOCUMENT LONG-TERM PROPERTY STORAGE PROCESS – The Department of Transportation & Infrastructure should work with its contractor to document the process for when property can be moved from the main storage facility to long-term storage. Transportation & Infrastructure should document a City Attorney’s Office’s review of the policies and procedures to ensure they comply with legal requirements.



**PARTIALLY
IMPLEMENTED**

Agency’s original target date for completion: June 30, 2023

SUMMARY OF AGENCY ACTION

The Mayor's Office provided a policy, approved by the City Attorney's Office in May 2023, that includes requirements for updating the inventory spreadsheet and inventory forms for any property moved off site. It also includes instructions for how to retrieve property and who to notify in the city if someone wants to pick up their belongings after it has been moved.

However, we found the spreadsheet was missing information required by the policy such as dates property may be moved. Furthermore, as mentioned in Recommendation 1.2, none of the inventory forms we reviewed matched the example in the policy and in the instance where an item was moved to long-term storage and eventually discarded, the inventory form was not updated as required.

Mayor's Office staff said the phone number for Environmental Hazmat Services Inc. was listed on the property storage flyer and people could call them directly to get items moved from long-term storage to the main storage facility. In November 2024, they also said that to date, no one has contacted the city directly to have property moved from long-term storage to the main facility.

Regardless, the city is still not ensuring the contractor complies with the policy and the Lyall Settlement regarding what information should be included in both the inventory spreadsheet and on the forms.

Therefore, we consider this recommendation partially implemented.

Recommendation 1.18

PROVIDE EQUITABLE ACCESS TO INFORMATION – The city should go above and beyond the Lyall Settlement's requirements by providing information related to cleanups and property storage equitably to people who have limited English proficiency or who have a disability. The city can conduct a language assessment, create a language access plan, or perform a comparison with other cities to identify an appropriate way to determine which languages it should use for communication. This process should be documented in policy and procedure.



**PARTIALLY
IMPLEMENTED**

Agency's original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

While the city has made some effort in fulfilling this recommendation and is compliant with the Lyall Settlement for providing notices, it has not gone above and beyond the settlement requirements to provide information equitably to people who have limited English proficiency or who have a disability.

Though not in the settlement itself, City Attorney’s Office staff said that posting notices in Spanish was a specific requirement by the court at the time of the Lyall Settlement and was agreed to by the city once a translation budget could be identified. The city provided evidence to support it was posting notices in both English and Spanish and updated its policy to include this requirement. Mayor’s Office staff said people with disabilities — such as those with a visual impairment — are communicated with verbally.

However, the city does not have any other communication methods for people with disabilities, beyond verbal communication at the time the notice is posted, which means a person may not receive necessary information if they are not present when a notice is posted.

Mayor’s Office staff said the city has not identified a way to determine which languages it should use for communication. Also, City Attorney’s Office staff said they had not heard of other cities posting notices in more than two languages and determining what other languages are needed is difficult because people experiencing homelessness often move and there is no static population to assess language needs.

Instead of determining the appropriate languages to use, City Attorney’s Office staff said the city was assisting people with limited English proficiency and disabilities by listing the city’s 311 number on all notices so individuals can call and request an interpreter to help them ask any questions. Staff also said the city website can be translated into a person’s preferred language to communicate encampment-related information.

While these resources exist as methods of communicating encampment cleanup and storage information, the city cannot assume people experiencing homelessness have cellphones or internet access. Without conducting some sort of language access assessment, the city cannot know whether they are effectively and equitably communicating to people experiencing homelessness.

Therefore, we consider this recommendation partially implemented.

Recommendation 1.19

PROVIDE CONSISTENT COMMUNICATION – The Department of Transportation & Infrastructure should work with the City Attorney’s Office to revise notices at encampment sites to clearly state how long property will be kept at both the main storage facility as well as long-term storage. Notices should clarify that a person may have to visit the main storage facility more than once to retrieve any belongings being held offsite.



**PARTIALLY
IMPLEMENTED**

Agency’s original target date for completion: April 20, 2023

SUMMARY OF AGENCY ACTION

The City Attorney's Office provided evidence showing it worked with the Department of Transportation & Infrastructure to revise storage facility notices. The notices clearly say how long property will be kept at both the main and long-term storage facilities and provide the main storage facility's location, hours, and phone numbers to call. However, the notices do not say that a person may have to visit the main storage facility more than once to retrieve any belongings being held off site, as required by the recommendation.

Therefore, we consider this recommendation partially implemented.

FINDING 2 | The city is not tracking expenses related to homeless encampments or sufficiently monitoring invoices and contract performance

RECOMMENDATION	IMPLEMENTATION STATUS
2.1 Identify expenses to track	● NOT IMPLEMENTED
2.2 Develop an expense-tracking method	● PARTIALLY IMPLEMENTED
2.3 Develop and document expense-tracking policies and procedures	● NOT IMPLEMENTED
2.4 Establish oversight of invoices	● NOT IMPLEMENTED
2.5 Develop and document invoice policies and procedures	● NOT IMPLEMENTED
2.6 Establish contract and master purchase order oversight	● NOT IMPLEMENTED
2.7 Develop and document contract monitoring policies and procedures	● NOT IMPLEMENTED
2.8 Follow the city's records retention policy	● PARTIALLY IMPLEMENTED
2.9 Ensure security services are provided	● NOT IMPLEMENTED

Recommendation 2.1



**NOT
IMPLEMENTED**

IDENTIFY EXPENSES TO TRACK – The Denver Unauthorized Encampment Response Program coordinated by the Mayor's Office should work with city agencies to determine how encampment-response expenses should be calculated and should identify which expenses should be included.

Agency's original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Mayor's Office staff did schedule meetings with city agencies beginning Dec. 5, 2024, to demonstrate their intention to address this recommendation, but no significant actions had been taken before then. Therefore, we consider this recommendation not implemented.

Recommendation 2.2

DEVELOP AN EXPENSE-TRACKING METHOD – The Denver Unauthorized Encampment Response Program coordinated by the Mayor's Office should develop a method for tracking homeless encampment expenses, such as, but not limited to, using Workday tags.



**PARTIALLY
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

The city created a Workday tag to track encampment-related expenses, and Mayor’s Office staff scheduled meetings with city agencies to discuss expense documentation and to train staff on using the Workday tag. However, staff said the Workday tag will not be used until March 2025.

Therefore, we consider this recommendation partially implemented.

Recommendation 2.3

DEVELOP AND DOCUMENT EXPENSE-TRACKING POLICIES AND PROCEDURES –

The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop and document policies and procedures for calculating annual encampment response-related expenses to ensure consistency across city agencies. Policies and procedures should be included in the program management plan.



**NOT
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

As mentioned in recommendations 2.1 and 2.2, the city has not determined how agencies will calculate encampment response-related expenses.

Therefore, we consider this recommendation not implemented.

Recommendation 2.4

ESTABLISH OVERSIGHT OF INVOICES – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with agencies involved with encampment response to identify a person within each agency to be responsible for reviewing and approving invoice payments – including reviewing supporting documentation – for encampment-related contracts used by multiple city agencies to ensure expenses are allowable and that the contractor fulfills contractual requirements.



**NOT
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

The Mayor’s Office did not provide any evidence other than the meeting invites mentioned in Recommendation 2.1 to show it had worked with relevant agencies to identify an employee responsible for invoice review and approval.

While the invites suggest which city staff will be involved in discussing encampment expense tracking, there is no formal documentation assigning responsibility to agency staff.

Therefore, we consider this recommendation not implemented.

Recommendation 2.5

DEVELOP AND DOCUMENT INVOICE POLICIES AND PROCEDURES – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with city agencies with encampment-related contracts to develop policies and procedures for requesting, reviewing, and maintaining supporting documentation for invoice payments to ensure invoices are paid according to contract requirements.



**NOT
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Mayor’s Office staff said that existing city fiscal policies and procedures address requesting, reviewing, and maintaining supporting documentation and that relevant city employees would be retrained on those policies and procedures in March 2025.

However, despite city agencies being required to follow existing city Fiscal Accountability Rules at the time of the original audit, we still identified issues with the invoice process.

Therefore, we consider this recommendation not implemented.

Recommendation 2.6

ESTABLISH CONTRACT AND MASTER PURCHASE ORDER OVERSIGHT – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with city agencies involved with encampment response to identify a person within each agency to be responsible for monitoring contract and master purchase order compliance and performance of contractors for encampment-related contracts and purchase orders used by multiple city agencies.



**NOT
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Similar to Recommendation 2.4, the Mayor’s Office did not provide any evidence other than meeting invitations to show it had worked with relevant agencies to identify an employee responsible for contract monitoring, master purchase order compliance, and contractor performance.

Therefore, we consider this recommendation not implemented.

Recommendation 2.7

DEVELOP AND DOCUMENT CONTRACT MONITORING POLICIES AND PROCEDURES

– The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with city agencies with encampment-related contracts and master purchase orders to develop policies and procedures for monitoring compliance and performance.



**NOT
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Mayor’s Office staff said they will work with city agencies, including the City Attorney’s Office, to develop policies and procedures and that the first meeting to discuss this would be held in December 2024. Because we finished follow-up work in late December, we did not confirm the meeting was held.

Therefore, we consider this recommendation not implemented.

Recommendation 2.8

FOLLOW CITY’S RECORDS RETENTION POLICY – City agencies responsible for invoice payment and contract monitoring should comply with the city’s records retention policy related to invoice supporting documentation.



**PARTIALLY
IMPLEMENTED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

City agencies must retain financial records, including invoice supporting

documentation, for seven years according to the city's records retention policy.

We reviewed eight of 46 invoices from 2023 and 2024 for services provided by Environmental Hazmat Service Inc. All eight included supporting documentation for the hours security guards were on-site at the property storage facility. However, Transportation & Infrastructure did not provide supporting documentation for any other line items, such as documentation to support hours worked by nonsecurity staff.

As a result, we cannot be certain the city is following the records retention policy for all expenses included in invoices.

Therefore, we consider this recommendation partially implemented.

Recommendation 2.9

ENSURE SECURITY SERVICES ARE PROVIDED – The Department of Transportation & Infrastructure and the Department of Public Health and Environment should identify and implement a method to ensure adequate security services are provided during all hours the property storage facility is open to the public in compliance with the Environmental Hazmat Services contract.



**NOT
IMPLEMENTED**

Agency's original target date for completion: March 1, 2023

SUMMARY OF AGENCY ACTION

The Department of Transportation & Infrastructure and the Department of Public Health and Environment have not ensured security services are provided during all hours the property storage facility is open to the public in compliance with the Lyall Settlement and Environmental Hazmat Services Inc. contract.

We reviewed eight of 46 invoices from 2023 and 2024 and found instances on all eight where security guard services were not provided as required.

Transportation & infrastructure managers had no explanation for why security services were not provided according to the settlement and contract but said they appreciated our findings and that they are dedicated to improving their processes and procedures to help limit these errors in the future.

Therefore, we consider this recommendation not implemented.

FINDING 3 | A draft city plan needs improvement to effectively guide city agencies in their responsibilities over unauthorized encampments

RECOMMENDATION	IMPLEMENTATION STATUS
3.1 Document program need	● NOT REVIEWED
3.2 Establish timeline for goals	● NOT REVIEWED
3.3 Develop performance metrics for goals	● NOT REVIEWED
3.4 Develop and document cleanup prioritization criteria	● NOT REVIEWED
3.5 Update and finalize the draft program management plan	● NOT REVIEWED
3.6 Monitor program effectiveness	● NOT REVIEWED
3.7 Revise program management plan as needed	● NOT REVIEWED

Recommendation 3.1

DOCUMENT PROGRAM NEED – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should document the need for the Denver Unauthorized Encampment Response Program, including a formal assessment of risks and stakeholder input, to inform the draft program management plan.



**NOT
REVIEWED**

Agency’s original target date for completion: July 1, 2022

SUMMARY OF AGENCY ACTION

Leaders in the City and Country of Denver’s new Mayor’s Office administration – which began in July 2023 – said the city changed its approach from responding to encampments and instead is focused on moving people into housing under a new program known as All in Mile High.

Leaders in the Mayor’s Office said that the original program and draft management plan reviewed in the 2023 audit no longer exist.

The Auditor’s Office is scheduled to review All in Mile High in 2025.

Therefore, this finding and recommendation may be considered for review at that time.

Recommendation 3.2



**NOT
REVIEWED**

ESTABLISH TIMELINE FOR GOALS – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop a timeline for achieving all program goals.

Agency’s original target date for completion: Oct. 31, 2023

SUMMARY OF AGENCY ACTION

Leaders in the City and Country of Denver’s new Mayor’s Office administration – which began in July 2023 – said the city changed its approach from responding to encampments and instead is focused on moving people into housing under a new program known as All in Mile High.

Leaders in the Mayor’s Office said that the original program and draft management plan reviewed in the 2023 audit no longer exist.

The Auditor’s Office is scheduled to review All in Mile High in 2025.

Therefore, this finding and recommendation may be considered for review at that time.

Recommendation 3.3



**NOT
REVIEWED**

DEVELOP PERFORMANCE METRICS FOR GOALS – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop performance metrics for all program goals.

Agency’s original target date for completion: Oct. 31, 2023

SUMMARY OF AGENCY ACTION

Leaders in the City and Country of Denver’s new Mayor’s Office administration – which began in July 2023 – said the city changed its approach from responding to encampments and instead is focused on moving people into housing under a new program known as All in Mile High.

Leaders in the Mayor’s Office said that the original program and draft management plan reviewed in the 2023 audit no longer exist.

The Auditor’s Office is scheduled to review All in Mile High in 2025.

Therefore, this finding and recommendation may be considered for review at that time.

Recommendation 3.4



**NOT
REVIEWED**

DEVELOP AND DOCUMENT CLEANUP PRIORITIZATION CRITERIA – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop and document criteria for systematically determining how to prioritize encampment cleanups.

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Leaders in the City and Country of Denver’s new Mayor’s Office administration – which began in July 2023 – said the city changed its approach from responding to encampments and instead is focused on moving people into housing under a new program known as All in Mile High.

Leaders in the Mayor’s Office said that the original program and draft management plan reviewed in the 2023 audit no longer exist.

The Auditor’s Office is scheduled to review All in Mile High in 2025.

Therefore, this finding and recommendation may be considered for review at that time.

Recommendation 3.5



**NOT
REVIEWED**

UPDATE AND FINALIZE THE DRAFT PROGRAM MANAGEMENT PLAN – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should update its draft program management plan to identify all responsible parties, document policies and procedures for all agencies and teams involved in encampment response efforts – including enforcement, outreach, and cleanup – and establish a process for ongoing program monitoring. Once the draft plan is revised, the coordinator with the Mayor’s Office should finalize the plan.

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Leaders in the City and Country of Denver’s new Mayor’s Office administration – which began in July 2023 – said the city changed its approach from responding to encampments and instead is focused on moving people into housing under a new program known as All in Mile High.

Leaders in the Mayor’s Office said that the original program and draft management plan reviewed in the 2023 audit no longer exist.

The Auditor’s Office is scheduled to review All in Mile High in 2025.

Therefore, this finding and recommendation may be considered for review at that time.

Recommendation 3.6

MONITOR PROGRAM EFFECTIVENESS – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should use quality data to monitor program effectiveness and progress toward meeting the defined goals and objectives of the program.



**NOT
REVIEWED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Leaders in the City and Country of Denver’s new Mayor’s Office administration – which began in July 2023 – said the city changed its approach from responding to encampments and instead is focused on moving people into housing under a new program known as All in Mile High.

Leaders in the Mayor’s Office said that the original program and draft management plan reviewed in the 2023 audit no longer exist.

The Auditor’s Office is scheduled to review All in Mile High in 2025.

Therefore, this finding and recommendation may be considered for review at that time.

Recommendation 3.7

REVISE PROGRAM MANAGEMENT PLAN AS NEEDED – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should revise the Denver Unauthorized Encampment Response Program plan in line with leading practices and after reviewing the results of program monitoring, as necessary.



**NOT
REVIEWED**

Agency’s original target date for completion: Dec. 31, 2023

SUMMARY OF AGENCY ACTION

Leaders in the City and Country of Denver’s new Mayor’s Office administration – which began in July 2023 – said the city changed its approach from responding to encampments and instead is focused on

moving people into housing under a new program known as All in Mile High.

Leaders in the Mayor's Office said that the original program and draft management plan reviewed in the 2023 audit no longer exist.

The Auditor's Office is scheduled to review All in Mile High in 2025.

Therefore, this finding and recommendation may be considered for review at that time.

FINDING 4 | The city’s encampment response program may not be appropriately staffed to achieve its goals and responsibilities

RECOMMENDATION

4.1 Conduct a staffing analysis

IMPLEMENTATION STATUS

● NOT REVIEWED

Recommendation 4.1

CONDUCT A STAFFING ANALYSIS – The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should conduct a formal staffing or workforce analysis to identify existing staffing levels across agencies involved in encampment response and determine needs to meet program objectives and goals.



**NOT
REVIEWED**

Agency’s original target date for completion: Dec. 31, 2024

SUMMARY OF AGENCY ACTION

Leaders in the City and Country of Denver’s new Mayor’s Office administration – which began in July 2023 – said the city changed its approach from responding to encampments and instead is focused on moving people into housing under a new program known as All in Mile High.

Leaders in the Mayor’s Office said that the original program and draft management plan reviewed in the 2023 audit no longer exist.

The Auditor’s Office is scheduled to review All in Mile High in 2025.

Therefore, this finding and recommendation may be considered for review at that time.

Office of the Auditor

The **Auditor** of the City and County of Denver is independently elected by the residents of Denver. He is responsible for examining and evaluating the operations of city agencies and contractors for the purpose of ensuring the proper and efficient use of city resources. He also provides other audit services and information to City Council, the mayor, and the public to improve all aspects of Denver's government.

The **Audit Committee** is chaired by the Auditor and consists of seven members. The Audit Committee assists the Auditor in his oversight responsibilities regarding the integrity of the city's finances and operations, including the reliability of the city's financial statements. The Audit Committee is structured in a manner that ensures the independent oversight of city operations, thereby enhancing residents' confidence and avoiding any appearance of a conflict of interest.



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We deliver independent, transparent, and professional oversight in order to safeguard and improve the public's investment in the City and County of Denver. Our work is performed on behalf of everyone who cares about the city, including its residents, workers, and decision-makers.
