On behalf of the Denver Department of Public Safety, I would like to thank the Denver Task Force to Reimagine Policing and Public Safety for their thoughtful recommendations for transforming public safety in Denver. These recommendations embody the spirit of collaboration, community involvement, responsive change, and interagency transparency and cooperation, which are all values that the Department shares.

The last few years have shown that there is much work to be done to ensure equitable, fair and just policing, public safety and criminal justice practices across our nation. While Denver has been pushing to reform and improve our practices, the Task Force and our community made it clear through the George Floyd protests and ongoing dialogues that we have more work to do.

In the following pages you will find our responses to each of the 112 recommendations delivered to the Denver Department of Public Safety in May 2021. Each recommendation was thoroughly reviewed and researched by representatives from all applicable City agencies, ranging from executive leadership to frontline personnel. Each recommendation was then assigned a response status or statuses: (1) will implement; (2) in progress; (3) previously implemented; (4) decline; and (5) other. I am proud of the work that the Department of Public Safety and our City partners have done in this space, and I am grateful for the opportunity to work alongside the Task Force and our community as a whole to further that work.

I would again like to thank the Task Force for putting so much time and effort into these recommendations. I have appreciated the time I have gotten to spend with the Task Force and discuss these critical issues, and I look forward to continuing those dialogues in the future. The Department recognizes that our responses are just one step in this process; meaningful change will require constant reevaluation and innovative thinking for years to come, and we look forward to continuing that work in partnership with our community.

Sincerely,

[Signature]

Armando Saldate III
Executive Director of Public Safety
<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recommendation 1</td>
<td>6</td>
</tr>
<tr>
<td>Recommendation 2</td>
<td>7</td>
</tr>
<tr>
<td>Recommendation 3</td>
<td>8</td>
</tr>
<tr>
<td>Recommendation 4</td>
<td>10</td>
</tr>
<tr>
<td>Recommendation 5</td>
<td>13</td>
</tr>
<tr>
<td>Recommendation 6</td>
<td>15</td>
</tr>
<tr>
<td>Recommendation 7</td>
<td>17</td>
</tr>
<tr>
<td>Recommendation 8</td>
<td>19</td>
</tr>
<tr>
<td>Recommendation 9</td>
<td>21</td>
</tr>
<tr>
<td>Recommendation 10</td>
<td>24</td>
</tr>
<tr>
<td>Recommendation 11</td>
<td>26</td>
</tr>
<tr>
<td>Recommendation 12</td>
<td>28</td>
</tr>
<tr>
<td>Recommendation 13</td>
<td>30</td>
</tr>
<tr>
<td>Recommendation 14</td>
<td>32</td>
</tr>
<tr>
<td>Recommendation 15</td>
<td>34</td>
</tr>
<tr>
<td>Recommendation 16</td>
<td>36</td>
</tr>
<tr>
<td>Recommendation 17</td>
<td>38</td>
</tr>
<tr>
<td>Recommendation 18</td>
<td>41</td>
</tr>
<tr>
<td>Recommendation 19</td>
<td>44</td>
</tr>
<tr>
<td>Recommendation 20</td>
<td>50</td>
</tr>
<tr>
<td>Recommendation 21</td>
<td>52</td>
</tr>
<tr>
<td>Recommendation 22</td>
<td>54</td>
</tr>
<tr>
<td>Recommendation 23</td>
<td>56</td>
</tr>
<tr>
<td>Recommendation 24</td>
<td>57</td>
</tr>
<tr>
<td>Recommendation 25</td>
<td>59</td>
</tr>
</tbody>
</table>
RECOMMENDATION 26 .......................................................................................................................... 61
RECOMMENDATION 27 .......................................................................................................................... 63
RECOMMENDATION 28 .......................................................................................................................... 65
RECOMMENDATION 29 .......................................................................................................................... 67
RECOMMENDATION 30 .......................................................................................................................... 69
RECOMMENDATION 31 .......................................................................................................................... 71
RECOMMENDATION 32 .......................................................................................................................... 74
RECOMMENDATION 33 .......................................................................................................................... 75
RECOMMENDATION 34 .......................................................................................................................... 77
RECOMMENDATION 35 .......................................................................................................................... 78
RECOMMENDATION 36 .......................................................................................................................... 81
RECOMMENDATION 37 .......................................................................................................................... 83
RECOMMENDATION 38 .......................................................................................................................... 85
RECOMMENDATION 39 .......................................................................................................................... 88
RECOMMENDATION 40 .......................................................................................................................... 89
RECOMMENDATION 41 .......................................................................................................................... 91
RECOMMENDATION 42 .......................................................................................................................... 93
RECOMMENDATION 43 .......................................................................................................................... 95
RECOMMENDATION 44 .......................................................................................................................... 98
RECOMMENDATION 45 .......................................................................................................................... 100
RECOMMENDATION 46 .......................................................................................................................... 101
RECOMMENDATION 47 .......................................................................................................................... 103
RECOMMENDATION 48 .......................................................................................................................... 105
RECOMMENDATION 49 .......................................................................................................................... 106
RECOMMENDATION 50 .......................................................................................................................... 108
RECOMMENDATION 51 .......................................................................................................................... 109
RECOMMENDATION 52 .......................................................................................................................... 110
RECOMMENDATION 53 .......................................................................................................................... 112
RECOMMENDATION 110.................................................................................................... 214
RECOMMENDATION 111.................................................................................................... 215
RECOMMENDATION 112.................................................................................................... 216
RECOMMENDATION 1
(Co-reference to Recommendation 2)
“Create an autonomous community-led, non-law enforcement institution that will serve as a platform for public funding of community-based public safety programming.”

KEY AGENCIES – Office of the Mayor; Department of Public Safety

EXECUTIVE BRANCH RESPONSE STATUS – Other

Response Highlight
- An independent assessment will be performed on the feasibility, need, and potential scope of a Denver Office of Community Engagement and/or an Office of Neighborhood Safety.
- The NYU Law School’s Policing Project is reviewing data from Denver to make recommendations to continue reimagining and transforming public safety services.

Executive Summary
- An independent assessment will be performed on the feasibility, need, and potential scope of a Denver Office of Community Engagement and/or an Office of Neighborhood Safety.
- The NYU Law School’s Policing Project is reviewing data from Denver to make recommendations to continue reimagining and transforming public safety services.
- The Mayor’s Office, in coordination with City Council leadership, has directed that an assessment be performed by an independent third party to evaluate the feasibility of, need for, and potential scope of a Denver Office of Community Engagement and/or an Office of Neighborhood Safety. The independent third party will collect data, perform an analysis, and make related recommendations.
- Executive Branch leadership will review the findings and recommendations of these research projects and assessments and develop recommendations regarding opportunities for improvement or expansion of programs and services, as well as identification of areas of duplication, gaps in public safety service delivery, and areas for improved coordination and/or communication.
- The Executive Branch is a partner organization in the NYU Law School’s Policing Project research related to Reimagining Public Safety, including Denver being identified as one of the Project’s research sites. The Policing Project partners with communities and police to promote public safety through transparency, equity, and democratic engagement. A team of qualitative and quantitative researchers have been reviewing data from Denver agencies, conducting community and systems focus groups and stakeholder interviews, performing site visits, and reviewing policies and procedures to make recommendations and work with Denver in the development a continuing framework for reimagining and transforming public safety services.
RECOMMENDATION 2

“Create permanent mechanisms with institutionally-stable decision-making roles for community, including disproportionately affected communities, and Department of Public Safety to collaborate in defining, understanding and producing public safety policies, procedures, rules and practices.”

KEY AGENCIES – Office of the Mayor; Department of Public Safety

EXECUTIVE BRANCH RESPONSE STATUS – Other, as described in detail below

Response Highlight

- An independent assessment will be performed on the feasibility, need, and potential scope of a Denver Office of Community Engagement and/or an Office of Neighborhood Safety.
- The NYU Law School’s Policing Project is reviewing data from Denver to make recommendations to continue reimagining and transforming public safety services.

Executive Summary

- The Mayor’s Office, in coordination with City Council leadership, has directed that an assessment be performed by an independent third party to evaluate the feasibility of, need for, and potential scope of a Denver Office of Community Engagement and/or an Office of Neighborhood Safety. The independent third party will collect data, perform an analysis, and make related recommendations.
- Executive Branch leadership will review the findings and recommendations of these research projects and assessments and develop recommendations regarding opportunities for improvement or expansion of programs and services, as well as identification of areas of duplication, gaps in public safety service delivery, and areas for improved coordination and/or communication.
- The Executive Branch is a partner organization in the NYU Law School’s Policing Project research related to Reimagining Public Safety, including Denver being identified as one of the Project’s research sites. The Policing Project partners with communities and police to promote public safety through transparency, equity, and democratic engagement. A team of qualitative and quantitative researchers have been reviewing data from Denver agencies, conducting community and systems focus groups and stakeholder interviews, performing site visits, and reviewing policies and procedures to make recommendations and work with Denver in the development a continuing framework for reimagining and transforming public safety services.
RECOMMENDATION 3
“Create and fund workshops led by people with lived experience in the criminal enforcement system that will solicit feedback on City systems that one must engage with for support.”

KEY AGENCIES – Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:

- The Denver Police Department (DPD) has reached out across the City to inform the public of news and events, to build partnerships, and to get feedback by listening to community concerns.
- A few examples include: the town hall conversation with the Chief of Police during the George Floyd protests; the [Denver Police Community Academy](https://www.denvergov.org/en/police/); “Coffee with the Cops” events.
- DPD also seeks input from community organizations on certain policies and procedures, like the policy on [Transgender Suspects and Arrestees](https://www.denvergov.org/en/police/) and [Show-Up Identification Procedures](https://www.denvergov.org/en/police/).
- DPD is creating a plan for better coordination of community outreach and developing workshop events for feedback from persons with lived experiences.

Executive Summary
Policies and procedures currently in place or planned:

**Current State**

- The Denver Police Department (DPD) engages in multi-faceted outreach efforts across the City to keep the public apprised of news and events, and to build partnerships and solicit feedback by listening to community concerns. Examples of these efforts include:
  - Inviting members of the public to a town hall conversation with the Chief of Police during the George Floyd protests;
  - Receiving advice from members of the Community Advisory Board to the Chief of Police on policies and other matters that influence or impact the relationship between DPD and the Denver community;
  - Providing an opportunity for community members to interact with officers and discuss current trends, themes, and topics at the [Denver Police Community Academy](https://www.denvergov.org/en/police/) through a multi-session interactive program available to members of the public via application;
  - Providing a forum for neighborhood residents to interact with and get to know District commanders at the “Coffee with the Cops” events;
    - Seeking input from community organizations on certain policies and procedures; for example:
      - Policy on [Transgender Suspects and Arrestees](https://www.denvergov.org/en/police/) (in collaboration with [The Center](https://www.thecenter.org/))
Show-Up Identification Procedures (in collaboration with Together Colorado)

- Promoting public education and partnership between DPD and the community through programs such as DPD Safe Place. The purpose of Safe Place is to assist victims of anti-LGBTQ+ bias-motivated crimes, to encourage reporting of these crimes, to reduce anti-LGBTQ+ bullying and harassment by public awareness, and to provide a physical safe space for victims of crime while they await the arrival of police.
- Using Community Resource Officers and members of the Citywide Impact Team to keep the community informed about important neighborhood issues and serve as liaisons between investigators and residents when there is a critical incident or bias-motivated crime.
- Engaging youth, adults, families, and local businesses to improve safety, education, access to resources, professional opportunities, and overall quality of life through programs like the Together with Westwood project.
- Maintaining strong partnerships with social justice and other grassroots organizations such as the Denver Dream Center, Together Colorado, Second Chance Center, Denver Ministerial Alliance, and many more.

Planned implementation

- DPD agrees that exploring funding options and partnerships to meet this recommendation through additional workshops and other engagement efforts will improve understanding, awareness, and relationships between the department and individuals with lived experience in the criminal law enforcement system.
- DPD is developing an implementation plan to increase coordination of the different community outreach efforts across the City and to develop quarterly workshop events to obtain feedback from persons with lived experience and create dialogue about their experiences and barriers within and created by the Denver criminal justice system.
- DPD will collaborate with community and criminal justice system partners, as well as the other Department of Safety agencies, to encourage participation and share information learned in the quarterly workshops and other community feedback events.
RECOMMENDATION 4
(Co-reference with Recommendation 5 & 6)
“Decentralize trauma-informed referral sources to enable community to help each other rather than having to call police or wait for business hours of a single entity (e.g. motel vouchers, etc.).”

KEY AGENCIES — Department of Public Health and Environment; Denver Human Services; Department of Housing Stability

EXECUTIVE BRANCH RESPONSE STATUS — Previously implemented in part; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:
- The Department of Public Health and Environment offers a community resource guide that can be found online in English and Spanish.
- Denver Strong offers free trainings to the community upon request, which can be found online here. Denver will also add videos of these trainings online for public access.
- The Office of Financial Empowerment and Protection offers help through free financial coaching, tax services and/or navigation resources at Financial Empowerment Centers in the community.
- Denver will also arrange for trainers to conduct training programs in the community at convenient locations and to teach members of the community to provide certain trainings.
- An online mapping application to help the public find resources, including mental health, substance abuse, housing services, and others, is now available online.
- DDPHE will add a community liaison to existing teams to ensure public needs are being heard and met if possible.
- Behavioral health contractors will be required to provide services through a trauma-informed standard of care.

Executive Summary
Policies and procedures currently in place or planned:

Current State
- Integrated multidisciplinary teams exist throughout the Executive Branch agencies and contractors to respond to community needs, as described below. Specifically, the Department of Public Health and Environment (DDPHE) coordinates contracts with many different organizations and vendors to provide behavioral health services across the City.
- DDPHE offers community resources for wellness and resilience. A community resource guide can be found online in English and Spanish, which includes resources within and outside of Denver.
- Denver Strong is a program within the Office of Behavioral Health Strategies designed to educate and empower the Denver community around behavioral health issues. Through this program, the City provides trainings grounded in evidence-based practices free of charge for community organizations upon request, which can be accessed online here. Trainings are available on trauma-informed practices, mental health first aid, and understanding de-
escalation, among others. At the end of each training, participants receive a Community Resource Guide with mental health and related services. Follow-up consultations and organizational assessments are also available upon request. DDPHE will work to develop these programs so that members of the public can also access them online.

- The Office of Financial Empowerment and Protection offers assistance through free financial coaching, tax services and/or navigation resources at Financial Empowerment Centers throughout the community. More information can be found here.

- DDPHE will additionally work to arrange for Denver trainers to conduct these training programs in the community at convenient locations (e.g. in rec. centers, schools, libraries, and the financial empowerment centers), including developing a plan to train members of the community to provide certain trainings within the community, in partnership with non-profit organizations in this sector.

- Denver works (and will continue to work) with community organizations to increase wellness and resilience in Denver neighborhoods by identifying current behavioral health stressors and then creating systems designed to coordinate access to appropriate and effective interventions and support.

- Related to alternatives to law enforcement providing emergency services when appropriate, the Support Team Assisted Response (STAR) Program was piloted in June 2020 and expanded as a permanent community response resource in 2021. When someone calls 9-1-1 for help, the Emergency Call-taking Technician (ECT) screens the information provided to identify the most appropriate resource to dispatch for assistance. When a person calls 9-1-1 for certain issues, such as a mental health crisis or a substance use issue, their call may be routed to STAR. The STAR Program is made up of Emergency Response Teams that include Emergency Medical Technicians (EMTs) and Behavioral Health Clinicians who respond to engage individuals experiencing crises related to mental health issues, poverty, homelessness, and substance abuse. The STAR Program currently runs 16 hours per day, 7 days per week, and is in the process of expanding. Additional information is available here.

- Related to housing assistance services offered after hours, the Department of Housing Stability (HOST) provides the family motel voucher writer program to overcome the limitations of the City’s business hours. More information on that program can be found here.

- There are additional non-City agencies providing services similar to those referenced in this Recommendation, such as Colorado Crisis Services, the statewide behavioral health crisis response system offering residents mental health, substance use, or emotional crisis help, information and referrals. Colorado Crisis Services’ mission is to strengthen Colorado’s mental health system by providing Coloradans with greater access to crisis services wherever they are 24/7/365, regardless of ability to pay. The program can be reached by phone, text, or walk-in centers. If a clinician determines that the best intervention requires face-to-face interaction, a Mobile Crisis Clinician may be dispatched to a person’s location.

Planned Expansion

- The Department of Public Safety has created an online mapping application to help the public find resources, including mental health, substance abuse, housing services, and others, to use or share with others. The application can identify resources by service type, location, and hours of service. Resources will be updated as the application’s capabilities expand to be as comprehensive as possible.
• DDPHE will add a community liaison to already-existing integrated multidisciplinary teams to ensure community needs are being heard and met to the extent feasible.

• When the City goes through the process to contract with behavioral health service providers, contractors will be required to demonstrate, and the contracts will include a provision requiring, that the contractor must provide services through a trauma-informed standard of care.
RECOMMENDATION 5
(Co-reference with Recommendation 4 & 6)
“Create online trainings and an education resource bank for families and neighbors to learn how to support people with various mental health and/or behavioral health issues.”

KEY AGENCIES – Denver Human Services; Department of Public Health and Environment; Office of Financial Empowerment and Protection

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:

- The Department of Public Health and Environment offers a community resource guide that can be found online in English and Spanish.
- Denver Strong offers free trainings to the community upon request, which can be found online here. Denver will also add videos of these trainings online for public access.
- The Office of Financial Empowerment and Protection offers help through free financial coaching, tax services and/or navigation resources at Financial Empowerment Centers in the community.
- Denver will also arrange for trainers to conduct training programs in the community at convenient locations and to teach members of the community to provide certain trainings.
- An online mapping application to help the public find resources, including mental health, substance abuse, housing services, and others, is now available online.
- DDPHE will add a community liaison to existing teams to ensure public needs are being heard and met if possible.

Executive Summary
Policies and procedures currently in place or planned:

- The Denver Department of Public Health and Environment (DDPHE) offers community resources for wellness and resilience. A community resource guide can be found online in English and Spanish, which includes resources within and outside of Denver.
- Denver Strong is a program within the Office of Behavioral Health Strategies designed to educate and empower the Denver community around behavioral health issues. Through this program, the City provides trainings grounded in evidence-based practices free of charge for community organizations upon request, which can be accessed online here. Trainings are available on trauma-informed practices, mental health first aid, and understanding de-escalation, among others. At the end of each training, participants receive a Community Resource Guide with mental health and related services. Follow-up consultations and organizational assessments are also available upon request. DDPHE will work to develop these programs so that members of the public can also access them online.
- The Office of Financial Empowerment and Protection offers assistance through free financial coaching, tax services and/or navigation resources at Financial Empowerment Centers throughout the community. More information can be found here.
- Denver will additionally work to arrange for Denver trainers to conduct these training programs in the community at convenient locations (e.g. in rec. centers, schools, libraries, and the financial
empowerment centers), including developing a plan to train members of the community to provide certain trainings within the community, in partnership with non-profit organizations.

- The Department of Public Safety has created an online mapping application to help the public find resources, including mental health, substance abuse, housing services, and others, to use or share with others. The application can identify resources by service type, location, and hours of service. Resources will be updated as the application’s capabilities expand to be as comprehensive as possible.

- Denver works (and will continue to work) with community organizations to increase wellness and resilience in Denver neighborhoods by identifying current behavioral health stressors and then creating systems designed to coordinate access to appropriate and effective interventions and support.
RECOMMENDATION 6
(Co-reference with Recommendations 4 & 5)
“Broaden free and accessible community-based harm reduction strategies for mental health and substance abuse.”

KEY AGENCIES – Denver Human Services; Department of Public Health and Environment; Office of Financial Empowerment and Protection

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:
- The Department of Public Health and Environment offers a community resource guide that can be found online in English and Spanish.
- Denver Strong offers free trainings to the community upon request, which can be found online here. Denver will also add videos of these trainings online for public access.
- The Office of Financial Empowerment and Protection offers help through free financial coaching, tax services and/or navigation resources at Financial Empowerment Centers in the community.
- Denver will also arrange for trainers to conduct training programs in the community at convenient locations and to teach members of the community to provide certain trainings.
- An online mapping application to help the public find resources, including mental health, substance abuse, housing services, and others, is now available online.
- DDPHE will add a community liaison to existing teams to ensure public needs are being heard and met if possible.
- Behavioral health contractors will be required to provide services through a trauma-informed standard of care.

Executive Summary
Policies and procedures currently in place or planned:
- The Denver Department of Public Health and Environment (DDPHE) offers community resources for wellness and resilience. A community resource guide can be found online in English and Spanish, which includes resources within and outside of Denver.
- Denver Strong is a program within the Office of Behavioral Health Strategies designed to educate and empower the Denver community around behavioral health issues. Through this program, the City provides trainings grounded in evidence-based practices free of charge for community organizations upon request, which can be accessed online here. Trainings are available on trauma-informed practices, mental health first aid, and understanding de-escalation, among others. At the end of each training, participants receive a Community Resource Guide with mental health and related services. Follow-up consultations and organizational assessments are also available upon request. DDPHE will work to develop these programs so that members of the public can also access them online.
- The Office of Financial Empowerment and Protection offers assistance through free financial coaching, tax services and/or navigation resources at Financial Empowerment Centers throughout the community. More information can be found here.
- Denver will additionally work to arrange for Denver trainers to conduct behavioral health training programs in the community at convenient locations (e.g. in rec. centers, schools, libraries, and the financial empowerment centers), including developing a plan to train members of the community to provide certain trainings within the community, in partnership with non-profit organizations.

- The Department of Public Safety has created an online mapping application to help the public find resources, including mental health, substance abuse, housing services, and others, to use or share with others. The application can identify resources by service type, location, and hours of service. Resources will be updated as the application's capabilities expand to be as comprehensive as possible.

- Denver works (and will continue to work) with community organizations to increase wellness and resilience in Denver neighborhoods by identifying current behavioral health stressors and then creating systems designed to coordinate access to appropriate and effective interventions and support.
RECOMMENDATION 7
“Include effective faith-based community services in the overall public safety plan.”

KEY AGENCIES — Department of Public Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS — Previously implemented; in progress

Response Highlight
• The Department of Public Safety and its agencies value partnership with faith-based organizations. Partnerships include representatives on community advisory boards; partnership with community-based Chaplains to provide services; and work with faith-based communities on programs such as the Bias-Motivated Crime Reporting Hotline and community-building and educational events.

Executive Summary
• The Department of Public Safety and its agencies value community partnerships, including those with faith-based organizations, which are imperative to understanding the needs and concerns of community members, as well as the identification of culturally-responsive methods of communication and provision of services.
• Representatives of faith-based organizations currently participate in community advisory roles such as advisory boards for the Denver Police and Sheriff Departments and selection committees for leadership positions such as the Chief of Police, among others. Representatives of faith-based organizations may also participate through appointment to Mayoral Boards and Commissions.
• Various City agencies provide opportunities for faith-based organizations to directly provide services on behalf of the City, including through formal Requests for Proposals (“RFPs”) for professional services, microgrants, or opportunities to co-locate services.
• For example, the Safe Haven Program, supported by the Office of Community Violence Solutions, is a network of faith-based organizations that activate to support Denver residents impacted by violence.
  o Safe Haven provides access to resources to meet community needs, including coordination with mental health providers.
  o Safe Haven coordinates events such as monthly Prayer Walks, as well as incident-specific responses.
  o The Safe Haven network is working to continue expanding to provide culturally responsive representation and services for all members of Denver’s community.
• The Denver Sheriff Department (DSD) employs Chaplains as part of its Programs Team. Chaplains work directly with faith-based communities and volunteers from these communities to assist in the provision of religious services to inmates. Chaplains and faith-based partners support persons in custody through spiritual counseling, religious services, provision of religious reading materials and items, and connection to an individual’s religious communities for support while in custody and when re-entering the community, among other resources.
• The Denver Police, Fire, and Sheriff Departments also coordinate Chaplain Programs as a resource for employees with representatives from various faith-based organizations.
The agency Chaplain Programs are intended to provide spiritual support to personnel in the Department of Public Safety.

The Chaplains may also act as resources and advisors for culturally responsive representation and the ways in which public safety services are provided to the Denver community. For example, some Chaplains provide diversity training to new recruit academy classes.

The Denver Police Department (“DPD”) is currently in the process of adding a Chaplain Program representative to new recruit interview panels as part of the hiring process.

DPD works closely with faith-based communities. For example, DPD has created programs like the Bias-Motivated Crime Reporting Hotline to support religious groups or persons who may have been the targets of criminal activity based on their beliefs. DPD has also partnered with faith-based communities to host or sponsor community-building and educational events such as gun buyback events hosted at church locations, Lotería nights, Neighborhood Watch, and recruitment efforts with organizations such as the Dream Center and East Ministerial Alliance.
RECOMMENDATION 8
“Ensure funding of community-based public safety through set-asides for reconciliation, not just prospective change.”

KEY AGENCIES – Crime Prevention & Control Commission; Caring for Denver Foundation

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part, as outlined below

Response Highlight
- The Crime Prevention and Control Commission and Caring for Denver Foundation serve the role of funding public safety initiatives through community group participation.

Executive Summary
- The Crime Prevention and Control Commission (“CPCC) was established by ordinance in 2005. The identified legislative intent of the CPCC is to implement an evidence-based, accountable, and efficient public safety strategy to reduce crime, including juvenile delinquency, and to increase neighborhood safety. The CPCC recommends expenditures from the crime prevention and control fund. The Commission’s other purposes are:
  o To reduce crime, partly by reducing criminal recidivism;
  o To facilitate coordination among justice system agencies;
  o To support the development of a data-driven criminal justice system that offers a range of evidence-based sanctions and programs;
  o To facilitate the development of information technology and data necessary for effective criminal justice policy development, jail population management, and evaluation of sanctions and programs to hold offenders accountable; and
  o To facilitate efficient use of jail space by encouraging alternatives, where appropriate.
- There are 33 Commissioner positions; appointments represent various agencies in the criminal justice system, academic, and community interests, and 4 at-large positions, among other representatives.
  o Examples of community-based programming funded by the CPCC include:
    ▪ Community Reentry services (for more detail, see the responses to Recommendation 12, Recommendation 19, Recommendation 66, and Recommendation 71)
    ▪ Co-Responder services (for more detail, see the responses to Recommendation 26 and Recommendation 36)
- Caring for Denver was created by voter-approved initiated City ordinance to fund the following purposes:
  o Mental health services and treatment for children and adults;
  o Opioid and substance misuse prevention, treatment, and recovery programs;
  o Housing and case management services to reduce homelessness, improve long-term recovery, and reduce the use of jails and emergency rooms for those with mental health and substance misuse needs;
  o Suicide prevention programs;
Co-responder and alternative response program funding, and training on how to properly assess and handle people with mental health and/or substance misuse needs.

These purposes are addressed through four community-identified, Board-approved funding priorities: Alternatives to Jail, Care Provision, Community-Centered Solutions, and Youth.

Caring for Denver’s work is guided by the provisions of its governing ordinance and the Denver community, with oversight from 13 Board members appointed by the Mayor, District Attorney, and City Council. Additional information about the Foundation’s Strategic Plan, funded projects, and ongoing work are available at the Caring for Denver website.
RECOMMENDATION 9
“Increase city funding potential for qualified community-based organizations that prioritize community care by streamlining and removing cumbersome barriers to Request for Proposal and Request for Qualifications contracting/granting processes.”

KEY AGENCIES – Denver Office of Nonprofit Engagement (D-ONE)

EXECUTIVE BRANCH RESPONSE STATUS – Will Implement as outlined below

Response Highlight
Non-Profit Task Force:
- The Strategic Partnerships Commission and Denver Office of Nonprofit Engagement created a report in 2020 on the wellbeing of nonprofits in Denver.
- The report included recommendations to address the needs and challenges of Denver nonprofits.
- One key recommendation was to create a Task Force to assess the nonprofit contracting process.
- In response, the city created a Task Force to assess its grant and contract processes for nonprofits.
- The Task Force includes 30 members from the foundation, nonprofit, and city government sectors who engage with or have influence on the city’s nonprofit contracting and support processes.
- The Task Force is currently developing recommendations to inform Denver’s work with nonprofits over the next three years.

Executive Summary
Non-Profit Task Force Q&A:
- The Denver Office of Nonprofit Engagement (D-ONE) (formerly DOSP/Denver Office of Strategic Partnerships) launched the Nonprofit Task Force in May 2021, which is taking a 360-degree look at how the city engages, funds, and utilizes its nonprofit sector. With the city’s current environment being shaped by shrinking budgets, a challenging economy, the impacts of COVID-19, and an increased need for more services, there is not a more important time than now to stop, reflect, and then ACT to support the nonprofit sector as they look to recover.

WHAT IS THE NONPROFIT TASK FORCE?
In response to the 2020 Wellbeing of Nonprofits Report, the Denver Office of Nonprofit Engagement (D-ONE) launched a Nonprofit Task Force to take a 360 degree look at the city’s process for providing grants and contracts to Denver-based nonprofits. The charge to the Task Force is to develop a set of recommendations that will drive the work of D-ONE from 2021-2024.

The Task Force consists of up to 30 individuals from inside city government and from the foundation and nonprofit sectors.

WHY IS SUCH A TASK FORCE NECESSARY?
In 2020, the Strategic Partnerships Commission and D-ONE released a report outlining the needs and struggles of nonprofits in Denver, including those working directly with the City and County of Denver. Denver is home to 12,430 nonprofits, generating $20 billion, and more than 120,000 jobs.

The report captured the challenges many nonprofits are facing themselves while delivering needed services to Denver residents. The report also serves as a critical tool to help strengthen the relationship between the nonprofit sector and the City & County of Denver. Furthermore, the report acknowledged that COVID-19 profoundly impacted the nonprofit sector.

In late May 2020, the Strategic Partnerships Commission and D-ONE presented Mayor Hancock with the report and findings along with a set of recommendations aimed at responding to the findings of the report. Mayor Hancock received the report and pledged to the commission a response to these findings by the end of July.

“I cannot overstate the value of the nonprofit sector in Denver,” Mayor Hancock said. “Nonprofits are our partners in serving some of neediest and hardest to reach residents, so we can never thank them enough. Like so many other sectors in our city, they have been impacted extremely hard by this ongoing pandemic. But these are challenges the city is committed to helping to solve.”

One of the key recommendations in the report to the Mayor was for the creation of a Task Force that would take a 360 degree look at how nonprofits are engaged, funded, and utilized—with a specific emphasis on the nonprofit contracting process. In July 2020, Mayor Hancock responded to the report and charged the Office of Nonprofit Engagement (then the Office of Strategic Partnerships) with convening and managing the Task Force.

**WHAT IS THE ENDGAME FOR THE TASK FORCE?**

The endgame for the Task Force is the creation of a “Nonprofit Manifesto” with a set of recommendations that will drive the work of the Denver Office of Nonprofit Engagement for the next three years.

**WE HEAR THE CITY’S PEAK ACADEMY HAS ALSO CONVENED A WORKING GROUP THAT IS EXPLORING HOW TO IMPROVE THIS PROCESS — HOW WILL THEIR WORK IMPACT THIS WORK?**

Yes, Peak Academy has convened a working group that is also looking to figure out how to improve the city’s contracting process. However, their work is focused on expenditure contracts, broadly. D-ONE and Peak Academy are working closely together to ensure there is not a duplication of efforts. In fact, leadership from the Peak Working Group will be one of the groups presenting to the Task Force to share what they have discovered and to inform the final recommendations. In addition, the D-ONE Director has joined the Peak Academy Working Group and will frequently report out on the work of the Task Force. Ultimately, the two groups will combine the results of their work to provide an overriding report on strategies to improve the city’s overall contracting process. If you have specific questions about Peak Academy’s Working Group, please email peakacademy@denvergov.org.
**WHO IS COORDINATING THE WORK OF THIS TASK FORCE?**
The convening and work of the Task Force is managed by the Denver Office of Nonprofit Engagement. The Task Force is co-chaired by two key professionals from outside of city government and professionally facilitated by Alchemy Strategy Group.

**HOW DOES THE TASK FORCE WORK?**
The Task Force utilizes a “Senate Hearing” style model where Task Force members hear “testimonies” from a variety of issue related groups, including purchasing professionals, contract administrators, general agency managers, the Strategic Partnerships Commission/Wellbeing Report Working Group, nonprofits, nonprofit advocates, and foundation execs. In addition, the Task Force analyzes existing marketplace data and combines it with what they learn from the “hearings” to develop a final report.

**WHO IS ON THE TASK FORCE & HOW WERE THEY SELECTED?**
Members of the Task Force come from a variety of internal and external places—but all with some engagement in or impact on the city’s nonprofit contracting and support process. Specifically, groups represented on the Task Force include small nonprofits (with budgets under $1M), foundation execs, other nonprofit advocacy groups, city purchasing and contract administrators, the Strategic Partnerships Commission, the Grant Policy Advisory Committee (GPAC), City Council, the City Attorney’s Office, and the Mayor’s Office. Individuals from these groups were selected by D-ONE because of their influence on the nonprofit contracting process and their desire to thoughtfully improve the process.

**WHO WILL “TESTIFY” OR PRESENT INFORMATION TO THE TASK FORCE?**
We are targeting sets of folks to testify from specific groups including small nonprofits (with budgets under $1M), foundation execs, other nonprofit advocacy groups, city contract administrators, the Strategic Partnerships Commission’s Nonprofit Wellbeing Report Working Group, the GPAC group, and Peak Performance. Our intent is to have panels of 3-5 people from each of these groups present to the Task Force.

**OF THE GROUPS THAT TESTIFY, HOW WERE THEY CHOSEN?**
Like the members of the Task Force, individuals from these groups were selected by D-ONE (formerly DOSP), in consultation with the Commission, and the facilitator because of their influence on the nonprofit contracting process for the city and their desire to thoughtfully improve the process.
RECOMMENDATION 10
“Create, expand and publicly promote crisis mediation and violence prevention and interruption through transformative justice principles and processes.”

KEY AGENCIES — Department of Public Safety

EXECUTIVE BRANCH RESPONSE STATUS — Previously implemented; in progress

Response Highlight
- The Department of Public Safety works with community partners to understand and address the challenges and harms facing the Denver community. Engagement with community partners is a key component of public safety. The Department will continue to build new community partnerships and support existing ones.

Executive Summary
- The Department of Public Safety has many valued community partnerships with which it works to understand and address the challenges and harms facing the Denver community, including those harms related to violence prevention and interruption and the appropriate response to crises. Engagement with community partners is a key component of public safety, especially in providing prevention and resiliency supports to persons in need or crisis. The Department acknowledges the need to continue to build new community partnerships in addition to supporting existing partnerships.
  - Examples of initiatives in which the Department has engaged with the support of community partners responsive to this Recommendation include, but are not limited to:
    - The Office of Community Violence Solutions (also known as Gang Reduction Initiative of Denver or GRID)
    - Adoption and implementation of Boston’s Operation Ceasefire and Cure Violence models of public health-based violence interruption;
    - Funding of community-based violence interrupters who provide incident response and resource referrals as well as prevention work to de-escalate and stop volatile situations.
- Safety Youth Programs
  - Denver Public Safety Youth Programs (PSYP) function as a partnership between the community, private, and government organizations to promote positive youth diversion and intervention programs. Youth programs serve thousands of youth and families each year through a number of prevention and intervention services.
    - PSYP manages juvenile diversion programs to minimize school-based pathways to the juvenile justice system.
    - PSYP supports the Denver Restorative Justice Program to expand the use of restorative justice practices within the juvenile justice system.
    - PSYP supports Denver Public Schools through a Caring for Denver grant that promotes restorative and trauma-informed practices within DPS schools.
- DPD Training Academy
  - See the Response to Recommendation 52 for detailed information about the comprehensive decision-making model and training resources provided to public safety
personnel that emphasize de-escalation, crisis mediation, violence prevention, and emotional intelligence-based decision-making in the tools, tactics, and resources to be utilized in contacts with members of the public.

- Alternative and Integrated Response
  - A detailed discussion of the STAR program can be found in the Response to Recommendation 26.
  - See also the Responses to Recommendations 36 and 49 regarding programs and response alternatives that the City has and continues to invest in related to crisis mediation, violence prevention and interruption, and decreasing unnecessary criminal justice involvement.
RECOMMENDATION 11
“Prevent and eliminate homelessness through a centralized, city-run coordination system across the spectrum of housing needs that reflects real-time data about unit availability and instant ability to pinpoint tailored solutions.”

KEY AGENCIES – Department of Housing Stability (HOST)

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent feasible, as outlined below

Response Highlight
Policies and procedures currently in place or planned:

- Denver supports a regional Coordinated Entry System (CES) called OneHome. Coordinated Entry is a national best practice that matches people experiencing homelessness with housing. The goal is to coordinate across the community.
- Coordinated Entry is limited by the number of available housing units. When more housing units are available, the system can match people faster.
- Housing programs funded by Denver must take part of their referrals through OneHome. They must share information in the Homeless Management Information System (HMIS) database used by OneHome. HOST’s strategic plan includes goals to improve data quality in HMIS.
- The City’s Early Intervention Team (EIT) provides outreach to persons experiencing homelessness. The EIT connects residents with case management and the OneHome system.
- HOST created a Five-Year Strategic Plan to address Denver’s housing needs.

Executive Summary
Policies and procedures currently in place or planned:

- Denver supports a regional Coordinated Entry System (CES) called OneHome. HOST requires housing programs that it funds to take some of their referrals through OneHome. It also requires participation in the Homeless Management Information System (HMIS) database that OneHome uses to implement the system. HOST provides staff support for OneHome and participates in committees on OneHome policy. HOST’s strategic plan includes goals to improve data quality in HMIS.
- Coordinated Entry is a national best practice to match households experiencing homelessness with housing in a coordinated way across the community. OneHome is managed by Metro Denver Homeless Initiative (MDHI), a nonprofit organization external to the City that serves as the continuum of care lead for Metro Denver. A continuum of care (CoC) is a homelessness planning area for the purposes of federal funding; Denver is part of a 7-county CoC that also includes Adams County, Arapahoe County, Boulder County, Broomfield County, Douglas County, and Jefferson County. The U.S. Department of Housing and Urban Development requires CES to cover the entire CoC. As a result, MDHI has established a CES that covers the entire region.
- Residents can access the OneHome system by connecting with a provider within the homeless service system. Partner agencies participating in OneHome can be found on the OneHome website, and include shelters, outreach providers, housing providers, etc. The City directly
provides an outreach team, the Early Intervention Team, that is utilizing the HMIS system and connecting residents with case management and the OneHome system.

- OneHome and CES in general are limited in their ability to match households to housing in real time by the limited availability of housing. When housing resources are scaled with need, the system will be able to more quickly meet household needs. HOST has developed a Five-Year Strategic Plan that provides more information about how the City is addressing Denver’s housing needs, which can be accessed at the link below.

Additional information for reference:
- MDHI website
- OneHome website
- HOST Five-Year Strategic Plan
RECOMMENDATION 12
(Co-reference with Recommendation 50)
“Develop a multi-lingual comprehensive health, wellness, safety, and re-entry map of services and programs that includes eligibility criteria, agency and division contacts and application links.”

KEY AGENCIES – Department of Public Safety; Denver Sheriff Department; Denver Human Services; Department of Public Health and Environment

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:
- The Denver Sheriff Department (DSD) offers many multi-lingual resources to those in its care. Please visit the Inmate Programs and Services page for more information.
- DSD partnered with a local non-profit to develop 40 videos on available resources. Topics include how to find services on jobs, housing, education, health, and other needs.
- DSD partners with City agencies who offer information and support directly to inmates. This includes help with benefits eligibility, applications, and other paperwork.
- The Department of Public Safety has created an online mapping application to help the public find resources, including mental health, substance abuse, housing services, and others, to use or share with others. The application can identify resources by service type, location, and hours of service. Resources will be updated as the application’s capabilities expand to be as comprehensive as possible.

Executive Summary
Policies and procedures currently in place or planned:
- The Denver Sheriff Department (DSD) offers numerous programs aimed at helping individuals re-enter the community following incarceration. Please visit the Inmate Programs and Services page for more information.
- DSD has partnered with local non-profit Remerg, which is working with over 30 different community-based and government organizations to produce 40 short videos on topics ranging from vocational opportunities to trauma to housing options to digital literacy. The videos will also include information about how to access these services, either prior to or following release from DSD facilities. The DSD Programs Team will show these videos in the housing units at both the Downtown Detention Center and the Denver County Jail. Prior to the COVID pandemic, Remerg staff and volunteers would provide in-person presentations in the housing units. Due to limitations on in-person visitation required by the pandemic and seeking to develop a consistent and sustainable method to provide engaging and accessible resource information to persons in custody, the DSD and Remerg created the concept of a video library that can be shown on demand and with a recurring schedule.
- DSD also partners with the Department of Human Services (DHS) for on-site resource and benefits navigators who staff the Downtown Detention Center and County Jail, providing informational presentations regarding resources and benefits as well as one-on-one support to complete applications for food, supplemental, rental assistance, and medical benefit assistance upon release. DHS has obtained a special waiver status under the Colorado law governing access to
benefits, which means that persons in custody can file benefits applications prior to their release (though the benefits cannot be received until they have reentered community post-release).

- The Department of Public Safety has developed an interactive, web-based mapping application that can assist both members of the public and businesses working with persons needing resources within a walkable or accessible distance from their location. The Department is working to add resources to the application specific to the needs of persons reentering community post-incarceration and to add links to existing non-map-based resource databases (such as the Remerg website).

- The application is available for desktop or mobile users. Many of the services included have after-hours and weekend availability to expand access when other services are not available.

- Many services have been added to the application, but it will be continuously updated with more resources and to ensure existing resources are active, accurate, and accessible.

- The Department will also develop community partnerships to create sustainable processes for maintaining the tool and listed resources, adding additional resources, ensuring accessibility and proper advertisement of the tool and contents, and emphasizing expansion of community-based and -managed resources, including Remerg, Colorado Crisis Services, 2-1-1 Colorado, and others.
RECOMMENDATION 13
“Ensure that any initial public safety intervention with unhoused people includes a meaningful attempt to house the individual, with verification filed through the city’s coordination system.”

KEY AGENCIES – Department of Housing Stability; Denver Public Health and Environment; Department of Public Safety; Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:
- Denver supports a regional Coordinated Entry System (CES) called OneHome. Coordinated Entry is a national best practice that matches people experiencing homelessness with housing. Coordinated Entry is limited by the number of available housing units. When more housing units are available, the system can match people faster. It is important to note that Denver’s ability to quickly rehouse every person experiencing homelessness is limited by the availability and cost of housing.
- Housing programs funded by Denver must take part of their referrals through OneHome and share information in the Homeless Management Information System (HMIS) database used by OneHome. HOST’s strategic plan includes goals to improve data quality in HMIS.
- In 2022, HOST and the Department of Public Safety will pilot and evaluate a referral system for Safety personnel to connect people experiencing homelessness with whom they have regular contact to outreach services provided or contracted by HOST.

Executive Summary
Policies and procedures currently in place or planned:
- The City and County of Denver supports a regional Coordinated Entry System (CES) called OneHome. HOST requires housing programs that it funds to take a portion of their referrals through OneHome. It also requires participation in the Homeless Management Information System (HMIS) database that OneHome uses to implement the system. HMIS is a data system for homelessness services and housing programs that serve people experiencing homelessness. HOST also currently provides staff support for OneHome administration, actively participates in committees that set OneHome policy, and has established goals in HOST’s strategic plan to improve data quality gathered in HMIS.
- Coordinated Entry is a national best practice to match households experiencing homelessness with housing in a coordinated way across the community. OneHome is managed by Metro Denver Homeless Initiative (MDHI), a nonprofit organization external to the City that serves as the continuum of care lead for Metro Denver. A continuum of care (CoC) is a homelessness planning area for the purposes of federal funding; Denver is part of a 7-county CoC that also includes Adams County, Arapahoe County, Boulder County, Broomfield County, Douglas County, and Jefferson County. The U.S. Department of Housing and Urban Development requires CES to cover the entire CoC. As a result, MDHI has established a CES that covers the entire region.
• Against this backdrop, clear referral pathways should be in place for Safety personnel to connect people experiencing homelessness with whom they engage frequently and consistently to outreach services provided or contracted by HOST. This will allow HOST to coordinate connections to existing outreach teams. In 2022, HOST and the Department of Public Safety will plan to pilot a referral system and evaluate short-term outcomes (e.g. percentage of participants referred who enroll in an outreach program).

• Similar to communities nationally, Denver’s ability to quickly rehouse every person experiencing homelessness is limited by the availability and cost of housing. When housing resources are scaled with need, the system will be able to meet household needs more quickly. Denver has completed a 5-year plan for housing and homelessness. Our community can help these efforts by welcoming neighbors who have formerly experienced homelessness into your community and celebrating housing solutions in your neighborhood.

Additional information for reference:

MDHI website  
OneHome website  
HOST Five-Year Strategic Plan  
Colorado HMIS Policy
RECOMMENDATION 14
“Guarantee Department of Safety coordination with housing providers to support long term housing of anyone and everyone involved in the criminal enforcement system.”

KEY AGENCIES – Department of Housing Stability; Department of Safety; Human Rights & Community Partnerships

EXECUTIVE BRANCH RESPONSE STATUS – In progress; will implement as outlined below

Response Highlight
- Denver supports housing options for people in the criminal justice system in many ways, including:
  - Providing pre-release planning for persons exiting custody for housing, work, food security, education, and other needs.
  - A community-led Reentry Program to support persons returning to community.
- The City will support coordination between officers and street outreach teams to help people experiencing homelessness find housing.
- The Department of Safety and HOST will explore ways to reduce the impacts of justice system involvement on housing stability.

Executive Summary
- The City and County of Denver supports housing options for residents involved in the criminal enforcement system in a number of ways.
- The Department of Safety works with internal and community partner agencies to provide pre-release planning to support persons exiting custody regarding housing, employment, food security, educational, and other needs.
- The Denver Sheriff Department (“DSD”) has limited grant resources to support emergency housing. Although not a long-term solution, it often can serve as a bridge to other services (like longer-term housing) and gives community providers a place to locate someone after release.
- Through the end of March, DSD has grant funding to provide emergency housing vouchers to unhoused individuals releasing from DSD facilities who ask for emergency housing support. DSD partners with community motels and shelter providers to make sure individuals have a safe location to stabilize after release and plan for longer-term housing needs. DSD is actively working to sustainably fund the emergency housing voucher program when the grant funding ends.
- DSD, in partnership with the Crime Prevention and Control Commission (“CPCC”) and the Second Chance Center, administers a community-led Reentry Program to support persons exiting custody and returning into community. Through Second Chance Center’s chosen community partners, Tribe Recovery Homes and The Don’t Look Back Center’s House of Rahab, releasing individuals in participating programs can access sober living.
- The DSD Programs staff work with the Department of Public Health and Environment, Department of Human Services, and community partners like Remerg to provide benefits eligibility and application support, financial planning and counseling, and information regarding other services to support successful reentry into community after incarceration (see also the Response to Recommendation 12).
• The DSD Programs staff support navigation of longer-term housing needs for persons in custody with longer periods of incarceration and/or who are participating in jail-based programs. Opportunities include access to voucher lottery lists and referrals to sober living and community programs. Access to community-based housing support resources and options are challenging at this time due to COVID congregate living and social distancing protocols, and funding and staffing challenges created by the pandemic.

• Additionally, there are specific current and planned efforts for residents experiencing homelessness. The City has funded supportive housing programs for residents experiencing homelessness who are high utilizers of the justice system through social impact bond (SIB) financing. The program improved housing stability and reduced jail utilization among those who were housed. Pursuant to the Social Impact Partnership to Pay for Results Act (SIPPRA) project grant awarded to Denver in the amount of $5,512,000, the City will continue this work through a new project focusing on high utilizers of jail who are medically vulnerable. This work will be led by the Department of Housing Stability (HOST).

• As described in the Executive Branch response to Recommendation 13, support for rehousing is better provided by case managers who can maintain long-term contact with residents. One way Denver will help provide avenues for housing to residents experiencing homelessness is by piloting a referral pathway between Safety personnel and street outreach teams.

• Additionally, the Department of Safety and HOST will explore ways to reduce the impacts of justice system involvement on the housing stability of residents in supportive housing (e.g., examining issues related to competency holds). The Denver SIB evaluation found that the most common reason residents lost their housing was due to a jail stay of longer than 90 days.

Additional relevant information:
HOST Five-Year Strategic Plan
HOST 2022 Action Plan
Denver Social Impact Bond Evaluation
RECOMMENDATION 15
“Devote substantial housing funding that targets historically marginalized people and enables them to live in any and all communities and configurations.”

KEY AGENCIES – Department of Housing Stability

EXECUTIVE BRANCH RESPONSE STATUS – In progress as outlined below

Response Highlight
- Denver is working to expand access to affordable housing and help all Denver residents stay healthy, housed, and connected. The City has two dedicated funding sources for housing and homelessness.
- However, costs to develop and keep affordable housing are high. HOST and partner agencies are working hard to use available resources to make the biggest impact.
- HOST aims to support 7,000 new affordable rental and for sale homes over the next five years.
- Community Planning and Development and HOST are advancing the Expanding Housing Affordability project.
- HOST and other City agencies make investments to help residents stay in their homes or access housing that meets their needs. For example, by funding home sharing to help older adults age in place and home rehabilitation programs to support accessibility and other improvements.

Executive Summary
- The City and County of Denver is working diligently to expand access to affordable housing and help all Denver residents stay healthy, housed, and connected. Since Mayor Michael B. Hancock took office, the City has adopted two dedicated funding sources for housing and homelessness. The first is the Affordable Housing Fund, which generates about $30M annually. The second is the Homelessness Resolution fund, which generates about $40M annually. In addition, these issues are a primary focus for Denver’s recovery from the COVID-19 pandemic.
- However, costs to develop and preserve affordable housing are also high. It costs about $300,000 to develop a single unit of affordable housing in Denver. While current resources are not scaled to meet the entirety of the community’s need for affordable homes, the Department of Housing Stability and other City partner agencies are working hard to use available resources to make the biggest impact.
- HOST aims to support 7,000 new affordable rental and for sale homes over the next five years, increasing the percentage of income-restricted units in the city from 7% to 8%. Additionally, Community Planning and Development and HOST are advancing the Expanding Housing Affordability project, which is reviewing a range of tools (linkage fee, incentive zoning, and inclusionary or mandatory housing) to increase affordable housing citywide. HOST also plans to advance a prioritization policy in 2022 that would provide priority access to new affordable housing to residents at risk of displacement or who have been displaced.
- In addition to these policy and development and preservation efforts, HOST and other City agencies make programmatic investments to help residents stay in their homes or access housing that meets their needs. For example, both HOST and the Office of Human Rights and Community Partnerships fund home sharing to help older adults age in place. HOST also funds home rehabilitation programs to support accessibility and other needed improvements. For
more information on how the City is comprehensively addressing housing and homelessness in Denver, please see HOST’s Five-Year Strategic Plan and 2022 Action Plan, linked on this page.

Additional relevant information:
HOST Affordable Housing Dashboard
HOST Five-Year Strategic Plan 2022-2026
HOST 2022 Action Plan
Expanding Housing Affordability
RECOMMENDATION 16
“Promote and create permanently affordable housing options supplementary to Denver Housing Authority Housing units.”

KEY AGENCIES – Department of Housing Stability

EXECUTIVE BRANCH RESPONSE STATUS – Implemented in part to the extent feasible; further implementation in progress as outlined below

Response Highlight
- The Department of Housing Stability (HOST) works with partners to create and preserve affordable housing. HOST’s main tool for driving affordable homes is by investing gap financing in affordable housing projects.
- HOST receives federal funds and local funds to support this work. Denver taxpayers have passed the Affordable Housing Fund and the Homelessness Resolution Fund to support housing and homelessness.
- The City partners with the Denver Housing Authority (DHA) on the DHA Delivers for Denver (D3) intergovernmental agreement, which was established in 2018.
- HOST also negotiates affordability agreements with developers to integrate income-restricted housing into their projects.

Executive Summary
- The Department of Housing Stability (“HOST”) works with a range of development partners to create and preserve affordable housing. HOST’s primary tool for driving the development and preservation of affordable homes is by investing gap financing in affordable housing development projects. Gap financing helps close the “gap” between what the project costs to build and what funding the developer can access to do so. Because the rents a developer will charge to serve a low- or moderate-income household after the property is open impact the amount of financing they can get from traditional funding sources like loans, funding from HOST and other sources (including Low-income Housing Tax Credits) are needed to support development that will charge more affordable rents. HOST funds a range of development partners with gap financing, including Denver Housing Authority (“DHA”) and other nonprofit developers.
- HOST receives federal funds, primarily from the U.S. Department of Housing and Urban Development, and local funds to support this work. Denver taxpayers have passed two dedicated local revenue streams to support housing and homelessness.
  - The Affordable Housing Fund: Created in 2016 and doubled in 2018, the Affordable Housing Fund is resourced through property tax, a per square foot fee on new development called a “linkage fee,” sales tax on recreational marijuana, and the General Fund. It is administered by HOST and provides approximately $30 million annually to help address Denver’s affordable housing needs.
  - The Homelessness Resolution Fund: In 2020, Denver voters adopted ballot measure 2B, establishing the Homelessness Resolution Fund, a 0.25% sales tax to support residents experiencing and exiting homelessness. The fund is expected to generate approximately $40 million annually, though actual sales tax collection depends on economic factors. The
fund can be used for a range of eligible uses, including housing development for residents experiencing homelessness.

- The City partners with DHA on the DHA Delivers for Denver (D3) intergovernmental agreement, which was established in 2018. The agreement committed the property tax portion of the City’s Affordable Housing Fund to develop 2,500 affordable housing units. Of those, 1,300 units are to be developed under DHA’s pipeline and 1,200 are to be developed by partners under land lease with DHA land ownership to ensure perpetual affordability. Of those 1,200 units, 50% must be affordable at 30% AMI, targeted for supportive housing units.
- Funds outside the property tax portion of the Affordable Housing Fund are available to support a range of development partners.
- Additionally, HOST negotiates affordability agreements with market-based developers to integrate income-restricted housing into their projects. Through the Expanding Housing Affordability project, the City is advancing a Mandatory Housing Policy, which would require every multifamily market-rate residential development to include a percentage of its units as affordable. This will create mixed-income housing opportunities in neighborhoods throughout the City. Many of these units won’t materialize until 2024 or later, but it represents a significant opportunity to increase the City’s stock of affordable housing options beyond what can be supported through capital investment resources.

Additional relevant information:
HOST Five-Year Strategic Plan
HOST Affordable Housing Fund Policy Review
Affordable Housing Dashboard
Expanding Housing Affordability Project Page
RECOMMENDATION 17
“Eliminate housing barriers caused by racist zoning laws and under no circumstances allow use of law enforcement to address zoning code violation complaints.”

KEY AGENCIES – Community Planning and Development; Department of Housing Stability; Denver Fire Department; Human Rights & Community Partnerships

EXECUTIVE BRANCH RESPONSE STATUS – Implemented in part; In progress as outlined below

Response Highlights
- Community Planning Development (“CPD”) has adopted many plans with policy recommendations that will reduce housing barriers.
- One example is the Comprehensive Plan 2040. The Plan includes strategies to address historical inequities in neighborhoods across the city.
- Another example is Blueprint Denver, the city’s land use and transportation plan. Blueprint Denver calls for many changes to create more equitable neighborhoods. This includes:
  - Revising the zoning code to remove outdated codes rooted in bias;
  - Better accommodating a variety of housing types;
  - Adopting a more inclusive definition of “household;”
  - Integrating more missing middle housing in Denver; and
  - Removing barriers to creating accessory dwelling units (ADUs) in more neighborhoods.
- In early 2021, the city took a major step in revising the zoning code through its group living project. CPD led a three-year, community-driven process to modernize zoning regulations. In February 2021, City Council adopted the final rules. The new rules were a large step forward in fixing how zoning has historically divided cities based on race, class, and perceptions of people.
- The Department of Housing Stability (“HOST”) Five-Year Strategic Plan also supports affordable housing strategies.
- HOST and CPD are advancing the Expanding Housing Affordability initiative. The initiative will require affordable for-rent and for-sale units in every housing development across the city.
- To protect safety, health, and welfare, property owners must keep their properties safe and well-maintained. Denver has about two dozen "zoning and neighborhood inspectors" ("Z/NIS"), who handle public education and code enforcement.
- These inspectors respond to all complaints and concerns, with a focus on education. If there is a code violation at a property, the inspector notifies the owner and allows them at least 10 business days to correct the issue. There is no fine or citation at this first visit. After at least 10 business days, the inspector will re-check and work with the owner to resolve the issue. This may mean helping connect the resident to other resources. As a last resort, fines can start at $150 at the inspector’s third visit and may escalate from there.
- The process for zoning code enforcement is separate from the Denver Police Department (“DPD”). Code enforcement is an administrative process, not criminal.
- DPD officers do not regularly investigate complaints with CPD. CPD may request DPD help when:
  - The agency is aware of criminal activity at the address,
  - If there is a history of violence, or
  - If there are signs of breaking and entering.
• In certain situations, inspectors are allowed to issue a citation that would take a person into the criminal justice process. That tool has not been used in at least 5 years and is only used as a last resort.

Executive Summary
• Community Planning Development ("CPD") has adopted many plans that contain policy recommendations aimed at reducing housing barriers, which the department is currently working to implement. In particular, the Comprehensive Plan 2040 recognizes the inequities between Denver’s neighborhoods and creates a vision for a more equitable, inclusive city through strategies such as expanding housing options in every neighborhood.
• Equity is also a major component of Blueprint Denver, the city’s land use and transportation plan. Blueprint Denver calls for many changes to legacy zoning and regulatory systems in order to further reduce housing barriers and create more equitable neighborhoods. This includes:
  o Revising the zoning code to remove outdated codes rooted in bias and better accommodate a variety of housing types, including adopting a more inclusive definition of “household;”
  o Integrating more missing middle housing in Denver;
  o Removing barriers to creating accessory dwelling units (ADUs) in more neighborhoods.
• In early 2021, the city took a major step in revising the zoning code through its group living project. CPD led a three-year, community-driven process to modernize zoning regulations around how and where people live. In February 2021, City Council adopted the final rules, which were a large step forward in rectifying the role zoning has played in historically dividing cities based on race, class, and perceptions of people. The updated zoning language included the following:
  o Adopting a more inclusive definition of “household” and increasing the number of unrelated adults who may live together in a home;
  o Adjusting rules for residential care facilities so they are regulated by the number of people they serve, rather than by the type of people/need they serve;
  o Expanding the areas in the city where community corrections facilities are allowed to improve halfway house residents’ access to transportation, jobs, and services;
  o For more information on the group living project, visit the project website here.
• The Department of Housing Stability ("HOST") Five-Year Strategic Plan also commits to supporting the strategies outlined in Blueprint Denver that advance affordable housing. In partnership with HOST, CPD is advancing the Expanding Housing Affordability initiative to require affordable units, both for-rent and for-sale, in every market-rate housing development across the city. Additionally, HOST recently launched the metroDPA Social Equity Program to support access to homeownership through down payment assistance and home loans.
• Related to zoning code enforcement: In order to protect the safety, health, and welfare of all residents, city regulations require that property owners keep their properties safe and well-maintained. To accomplish this task, Denver has roughly two dozen "zoning and neighborhood inspectors" ("Z/NIS"), who handle public education and code enforcement throughout the city's 155 square miles. These inspectors respond to all complaints and concerns, with a focus on education. If there is a code violation at a property, the inspector notifies the owner and allows them at least 10 business days to correct the issue. There is no fine or citation at this first visit. After at least 10 business days, the inspector will re-check and work with the owner to resolve the issue if it has not been fixed. This may mean helping connect the resident to other resources. As a last resort in cases of non-responsive owners, fines can start at $150 at the inspector’s third visit and may escalate from there.
• The process for zoning code enforcement is done separately from the Denver Police Department ("DPD"); code enforcement is an administrative process, not criminal. DPD officers do not regularly investigate complaints with CPD. CPD may request DPD assistance when the agency is aware of criminal activity at the address, if there is a history of violence, or if there are signs of breaking and entering into a neglected/derelict building. In those cases, CPD works with the appropriate DPD Community Resource Officer.

• CPD also collaborates with DPD’s civilian outreach coordinators to make referrals for resources and navigation or when there is a need for safety inspections.

• CPD inspectors are trained in de-escalation techniques and have access to a list of sheltering resources to provide to persons with whom they come into contact. The process involves multiple notices and warnings before moving to fines for non-compliance. Inspectors have the authority to waive citations and/or fines if a person is cooperating and working toward compliance.

• In situations where it is necessary to protect the surrounding community members and/or address significant health hazards and inspectors have exhausted the regular avenues, there is an ability to issue a General Summons citation that would take a person into the criminal justice process. However, that tool has not been used in at least 5 years and is only used as a last resort.

• Denver Fire Department (“DFD”) has a supporting role in related building code matters, such as supporting the ADU work discussed above. DFD also participates in a collaborative hoarding task force and investigates community hazards such as hash oil extractions and illegal marijuana grow operations.

• DFD also subscribes to a life safety and compliance rather than enforcement philosophy in its work.
RECOMMENDATION 18
“Cease all city-sanctioned sweeps, cleanups, or any other variation of forced removal of homeless encampments from public property and invest all cost-savings into Safe Outdoor Spaces, trash pickup, portable toilets, case management, and other harm reduction strategies.”

KEY AGENCIES – Denver Department of Public Health and Environment; Department of Transportation and Infrastructure; Department of Housing Stability

EXECUTIVE BRANCH RESPONSE STATUS - Decline in part; previously implemented in part as described below

Response Highlight
• Outreach to connect persons experiencing homelessness to resources and sheltering, and resolving health and safety issues in encampments are high priorities.
• Denver uses a programmatic approach to help manage, communicate, and organize the response to unauthorized encampments.
• Denver offers three campsites (Safe Outdoor Spaces) and two tiny home villages as housing alternatives to the shelter system. Denver continues to look for alternative housing and to develop low-income housing.
• More detail on Denver’s response to unauthorized encampments and resources for persons experiencing homelessness can be found in the full Executive Summary.

Executive Summary
• It is the position of the City and County of Denver that no one should be living in an area that was not meant for human habitation, especially when there are city services available to help people experiencing homelessness. Managing unauthorized encampments continues to be a high priority for Denver to ensure that public health and safety issues are addressed as quickly as possible, and that outreach is offered to connect persons experiencing homelessness to supportive resources and sheltering. Additionally, the Denver Department of Public Health and Environment (“DDPHE”) has an obligation under the City’s Charter to ensure that environmental and public health hazards are investigated and abated. DDPHE is an integral part of ensuring public areas throughout the City do not pose environmental or public health hazards.
• Denver is using a programmatic approach to implement standardized processes that will assist with managing, communicating, and organizing the City’s response to unauthorized encampments. This approach incorporates best practices implemented by other cities. The main advantages of a programmatic approach are:
  o Enhanced coordination among City agencies, which improves their ability to manage unauthorized encampments consistently, efficiently, and effectively;
  o Enhanced data collection and analysis that supports decision-making;
  o Improved risk management, connection to services, the prioritization of public health and environmental considerations, and increased safety for persons experiencing homelessness, staff, and the public;
- Improved ability to plan, prioritize, assess, and articulate resource needs (including funding and staff resources);
- Improved program transparency and reporting of encampments and cleanup efforts.

- Denver’s first priority is always to try to connect people experiencing homelessness with services and shelter, addressing their immediate needs in partnership with the community and its regional partners.

- Denver funds several resource-focused outreach teams, which operate independently from enforcement actions. Outreach teams include the Denver Street Outreach Collaborative (“DSOC”), which is administered by Colorado Coalition for the Homeless, and the Early Intervention Team (“EIT”), which is part of the Department of Housing Stability (“HOST”). EIT provides direct service resource-focused outreach, which includes connection to benefits, shelter, case management, and housing resources. These teams work closely with the broader sheltering system, including Safe Outdoor Spaces, to connect those residing in camps with lifesaving emergency services in direct response to conditions in encampments.

- DSOC provides housing-focused case management, connecting people experiencing unsheltered homelessness to housing resources directly from street-level homelessness. Prioritization for housing occurs based on acuity and vulnerability, in absence of the availability of housing resources to scale with need. In addition, DSOC has a team directly responsive to large encampments: Strategic Outreach to Large Encampments (“SOLE”). Coordination occurs throughout the City to inform outreach workers of the clean-up schedule, so that they can prepare camp residents for the impacts of enforcement actions.

- Denver understands that working toward the resolution of homelessness will take a significant amount of time and support from all levels of government, including the State and metro area cities, as well as the community. Denver believes that by working together through the development of multiple strategies and innovations, including Denver’s commitment and increased investment in affordable and accessible housing, we can make great strides toward connecting people experiencing homelessness to needed shelter and services.

- Denver currently offers three sanctioned campsites (Safe Outdoor Spaces) and two tiny home villages that provide housing alternatives to the congregate shelter system. In addition, Denver opened a new 46-bed crisis-stabilization center last spring, a new 450-bed men’s shelter, and a 270-bed women’s shelter in June 2021. The City continues to look for alternative housing while low-income housing is also continuing to be developed.

- Denver is advancing a long-term goal of ensuring adequate affordable housing. In furtherance of this goal, City Council approved a five-year strategic plan to help guide how Denver invests resources, creates policy, and engages with partners to provide housing stability, resolve episodes of homelessness, and create housing opportunities.

- Cleanups of rights-of-way, including sidewalks and other public areas, are needed to consistently promote the health and safety of everyone, including those experiencing homelessness, and to ensure safe and unobstructed access. Denver Revised Municipal Code, Chp. 49, Sec. 49-246 requires that public spaces must remain free of unauthorized encumbrances to ensure sidewalks and other rights-of-way are accessible to everyone who needs or wants to use them.

- Encampments often result in large accumulations of discarded items, needles, rotting food, insects and rodents, human waste, and significant fire hazards caused by grills, active propane and gasoline fires. DDPHE has a chartered responsibility to keep Denver clean and safe, and therefore, regularly evaluates encampments to assess potentially unsafe and unhealthy
conditions for those who are staying there, those who are transiting through the area, and to identify and remediate negative impacts on the environment. When these environmental, health, and safety hazards are identified, DDPHE works with other city agencies to restore the area to a safe and stable state.

- Denver receives numerous complaints every week from the public regarding unauthorized encampments through a variety of methods including pocketgov.org, 911, 311, and calls and emails to city officials.

- On September 23, 2019, a federal court judge approved a class action settlement in Raymond Lyall, et al. v. City and County of Denver. The settlement included several non-monetary terms to which the parties agreed, including a specific notification process for large-scale encumbrance cleanups conducted by Denver Public Works (now the Denver Department of Transportation and Infrastructure or “DOTI”) and voluntary, free storage of personal property for up to 60 days. In addition to other obligations, the Agreement also memorializes the process the City uses to determine whether unattended personal property poses a public health or safety risk or whether the property will be stored for 60-days free of charge, further defines the process for DOTI and Parks and Recreation to follow when unattended property is encountered that does not pose a public health or safety risk outside of a large-scale encumbrance cleanup, and provides for the inclusion of additional trash receptacles at specified areas.

- Initiated Ordinance 300, which would have repealed Denver’s camping ordinance, was overwhelmingly rejected by voters in 2019. In response to Denver voters, the City continues to enforce the unauthorized camping ordinance through a multistep process that balances several important interests.

- In recognition that a law enforcement presence is not always necessary and that other City resources may be more appropriate in certain circumstances, the City created a civilian-staffed Street Enforcement Team (SET), which, among other responsibilities, also responds to reports of unlawful encampments. SET works within a compassionate compliance framework grounded in trauma-informed practices. SET makes every effort to connect people with resources prior to its role in enforcement of City ordinances.
RECOMMENDATION 19
(Co-reference with Recommendations 30 & 31)
“Build interagency collaboration teams between Criminal Justice, Social Work, Human Services, Education, Housing and for-profit/not-for-profit business sectors to ensure measurably improved delivery of services.”

KEY AGENCIES – Department of Safety; Denver Sheriff Department; Denver Police Department; Department of Housing Stability; Denver Human Services; Denver Department of Public Health & Environment; Human Rights and Community Partnerships; Denver Economic Development & Opportunity; Department of Finance; Office of Social Equity and Innovation; Office of Children’s Affairs

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part, will expand as outlined below

Response Highlight
- Executive Branch agencies already collaborate through work on prior and existing programs. Many of these programs track metrics to assist with delivery of services. Examples are included in the Executive Summary.
- The Executive Branch recognizes the opportunity to improve coordination and communication. During 2022, PEAK Academy and the Mayor’s Office of Social Equity and Innovation (OSEI) will assist to increase coordination, collaboration, and information-sharing to improve services.
- Interagency collaborative teams between the various agencies of the Executive Branch already exist through work on various prior and existing programs. Many of these programs additionally track metrics to assist with measuring and tracking the delivery of services. Some examples are included in the following chart:

Executive Summary

<table>
<thead>
<tr>
<th>Program/Project</th>
<th>Agencies Involved</th>
<th>Non-City Partners</th>
<th>Key Metrics or Evaluations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reentry Program</td>
<td>DSD, DDPHE (Crime Prevention and Control Commission)</td>
<td>Second Chance Center, Tribe Recovery, Don’t Look Back Center</td>
<td>The Reentry Program provides intensive case management and services in the jail and upon reentry to the community to individuals with medium to high-risk of recidivism. The goal of the program is improving protective factors and reducing the likelihood of recidivism for participants.</td>
</tr>
<tr>
<td>Program</td>
<td>Key Stakeholders</td>
<td>Description</td>
<td></td>
</tr>
<tr>
<td>---------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>ReCAST Grant</td>
<td>DDPHE, HRCP, Dept. of Safety, District Attorney, DHS, Office of Children’s Affairs</td>
<td>The Denver ReCAST Program will serve 13,170 at-risk youth and their families over the 5-year grant period. The program builds on Denver’s assets to integrate behavioral health services with efforts to address social determinants of health by creating a unified, coordinated infrastructure to impact youth violence, mental health concerns, and substance abuse. This infrastructure will be a partnership between public agencies and community-based organizations, managed by DDPHE. More information is available here.</td>
<td></td>
</tr>
<tr>
<td>STAR Program</td>
<td>DDPHE, Dept. of Safety</td>
<td>For more information, see the response to Recommendation 26.</td>
<td></td>
</tr>
<tr>
<td>Youth Violence Prevention Action Table</td>
<td>Office of the Mayor; Denver Public Library; Denver City Attorney’s Office; Denver City Council; Department of Public Safety; Denver Health; Denver Police Department; DDPHE; Office of Children’s Affairs; HRCP; Denver Public Schools; Cities United.</td>
<td>The YVPAT is a conglomerate of youth, community, and city leaders. More information is available here. Convened in 2019 under the leadership of Denver City Attorney Kristin M. Bronson, the Youth Violence Prevention Action Table increases communication and information sharing among city agencies, community organizations, and youth to address gaps and opportunities where the city can increase support. Additionally, the Action Table was tasked with developing a public</td>
<td></td>
</tr>
</tbody>
</table>
health approach to youth violence prevention in a set of strategies outlined in a December 2020 report. In February 2021, the City hired a new Youth Violence Prevention Program Administrator, who now serves as Chair of the Action Table and is responsible for implementing the recommendations of the report. More information is available here.

<table>
<thead>
<tr>
<th>Children’s Cabinet</th>
<th>The departments and agencies that directly impact Denver children and youth.</th>
<th>The mission of the Denver Children’s Cabinet is to coordinate and align programs and services and develop strategies to address gaps and remove barriers that hinder opportunities for Denver children and youth. More information is available here.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homelessness Cabinet</td>
<td>The Department of Housing Stability; the members of the Executive Branch that coordinate City-based programs, services, and policies related to homelessness.</td>
<td>The Denver Homelessness Cabinet’s purpose is to convene members of the Executive Branch to coordinate City-based programs, services, and policy in order to make homelessness rare, brief, and one-time in Denver. More information is available here.</td>
</tr>
<tr>
<td>The Gang Reduction Initiative of Denver</td>
<td>Office of Community Violence Solutions, Community-based organizations/providers</td>
<td>GRID is a network of federal, state, and local...</td>
</tr>
<tr>
<td>Program</td>
<td>Organizations</td>
<td>Description</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Intervention/Outreach Program</td>
<td>(Gang Outreach &amp; Multidisciplinary Team – District Attorney, DHS, DEDO)</td>
<td>government agencies, local businesses, community-based, grassroots and faith-based organizations that work in a collaborative manner to address gang violence. GRID is a part of Denver's Department of Public Safety and is committed to the suppression and prevention of gun and gang violence in Denver. Top metrics and evaluations include individuals served, development of coordinated case plans, connections to services, and recidivism rates. More information is available here.</td>
</tr>
<tr>
<td>Law Enforcement Assisted Diversion</td>
<td>DDPHE and Dept. of Safety/DPD</td>
<td>LEAD offers diversions from arrests for low-level crimes caused by behavioral health issues and places participants in intensive care management. The goal of the program is to reduce harms associated with drug use and to reduce the chances of recidivism for participants.</td>
</tr>
<tr>
<td>Denver Social Impact Bond Supportive Housing Initiative</td>
<td>Dept. of Safety, HOST, Department of Finance, Mental Health Center of Denver, Corporation for Supportive Housing, Urban Institute, Enterprise Community Partners, Private Funders</td>
<td>When hundreds of people experiencing chronic homelessness were offered housing and provided the supportive services they needed to thrive, they remained housed and reduced their...</td>
</tr>
</tbody>
</table>
interactions with costly emergency services years into the program, according to a new independent analysis of Denver’s innovative Supportive Housing Social Impact Bond initiative (SIB). Key goals include housing stability and jail bed reduction. More information is available here and here.

<table>
<thead>
<tr>
<th>Food Insecurity Workgroup</th>
<th>Office of Social Equity and Innovation, DDPHE, DHS, DEDO, OCA</th>
<th>The Food Insecurity Workgroup is a new group forming to lead strategy on collaborative efforts to promote food security in Denver communities.</th>
</tr>
</thead>
<tbody>
<tr>
<td>On-Site Outreach Case Coordinators</td>
<td>DHS and DSD</td>
<td>DHS and DSD coordinate to promote Medicaid and food assistance screenings.</td>
</tr>
</tbody>
</table>

- The Executive Branch also recognizes there is always an opportunity to improve cross-agency coordination and communication to increase the impact of collaborative teams and projects. To this end, the Executive Branch will establish collaboration and impact facilitation opportunities led by the Denver PEAK Academy with the input and assistance of the Mayor’s Office of Social Equity & Innovation.
  - Denver PEAK Academy is the innovation and process improvement section of the Budget & Management Office; more information is available here.
  - The Mayor’s Office of Social Equity and Innovation (“OSEI”) was created by Executive Order 146; more information is available here and here.
- During 2022, PEAK Academy and OSEI will assist with the development of a framework to increase coordination and collaboration and share opportunities and performance metrics to maximize benefits and resources for Denver communities. The core components will include:
  - Developing a cross-agency database to track programs and projects under development with the goal of sharing information and identifying potential opportunities for collaboration;
  - Coordinating established periodic communication and collaboration opportunities for agencies and non-City partners to share information and work together on relevant projects and programs;
o Facilitating cross-departmental high-impact process improvement events through the PEAK Academy model to ensure resources are maximized, inefficiencies are addressed, and innovation opportunities are identified;

o Support from the OSEI to ensure an equity lens is applied to cross-agency collaboration projects and programs and opportunities to dismantle historical and institutional inequitable policies and practices are identified and put into practice.
RECOMMENDATION 20
“Track race, ethnicity, color, gender, economic status, and disability status in police-initiated searches, arrests, incarceration, recidivism, and homelessness to study, share with the public, and correct disproportionate impacts.”

KEY AGENCIES – Department of Safety; Denver Police Department; Denver Sheriff Department; Department of Housing Stability; Denver Economic Development & Opportunity; Human Rights and Community Partnerships

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent feasible and allowed by law; in progress, as outlined below

Response Highlights
• The city and its agencies are required to follow legal and contractual requirements when tracking and reporting data.
• Law enforcement agencies are required by state law to collect demographic data. Some examples are:
  o The Law Enforcement Integrity Act, C.R.S. § 24-31-901 et. seq.,
  o The Regulation of Restrictive Housing in Local Jails, C.R.S. § 17-21-301 et. seq.,
• Data collected must be reported to the State each year. The data is also available to the public upon request through the Colorado Open Records Act, C.R.S. § 24-72-200.1 et. seq., or the Colorado Criminal Justice Records Act, C.R.S. § 24-72-301 et. seq.
• The Law Enforcement Integrity Act requires that the Denver Police Department (“DPD”) and Denver Sheriff Department (“DSD”) report certain demographic information related to contacts with members of the public.
• Data collection related to persons experiencing homelessness is governed by universal data standards. These standards are established by the federal government. Colorado’s Homeless Management Information System (“HMIS”) aligns with these standards.
• The Department of Housing Stability (“HOST”) funds partners who provide homelessness services and housing for people experiencing homelessness. HOST requires its partners to use Colorado’s HMIS if they receive funding from HOST.
• Colorado HMIS is managed for Metro Denver by Metro Denver Homeless Initiative (“MDHI”). MDHI publishes reports using HMIS data and other data that support the type of analysis called for in this Recommendation.
• Denver agencies are also required by law not to provide certain data to the public. Examples include confidential and privacy information related to:
  o Sexual assault victims, and Juveniles
  o Medical information protected by HIPAA, which may include disability-related information.

Executive Summary
• The information that the Executive branch agencies track and report is governed by the law and relevant contractual provisions, which Denver and its agencies are required to follow.
• Demographic data required to be collected by law enforcement agencies by state law, including the Law Enforcement Integrity Act, C.R.S. § 24-31-901 et. seq., and the Regulation of Restrictive Housing in Local Jails, C.R.S. § 17-21-301 et. seq., among others, must be annually reported to the
State, and is also available to the public upon request through the Colorado Open Records Act, C.R.S. § 24-72-200.1 et. seq., or the Colorado Criminal Justice Records Act, C.R.S. § 24-72-301 et. seq.

- The Law Enforcement Integrity Act requires that local law enforcement agencies, including the Denver Police Department (“DPD”) and Denver Sheriff Department (“DSD”), report certain demographic information related to contacts with members of the public, as defined in the Act, including the “perceived demographic information of the person contacted provided that the identification of these characteristics is based on the observation and perception of the peace officer making the contact and other available data.”

- State legislation allows, but does not require, a person to include a disability identifier symbol on identification, which would notify an officer that the individual has a disability.

- Regarding demographic data related to persons experiencing homelessness, the Department of Housing Stability (“HOST”) requires partners it funds to provide homelessness services and housing for people experiencing homelessness to use Colorado’s Homeless Management Information System (“HMIS”). Universal data standards for HMIS data systems across the country are established by the U.S. Department of Housing and Urban Development. These standards require that all programs collect information on age, race, ethnicity, gender, veteran status, and disabling condition status (self-reported). Additionally, some programs are required to collect information on income and types of disabling conditions. Colorado’s HMIS aligns with these standards. Colorado HMIS is managed locally for Metro Denver by Metro Denver Homeless Initiative (“MDHI”). MDHI publishes reports using HMIS data and other data (e.g., the Point-in-Time Count) that support the type of analysis called for in this Recommendation. The City uses PIT and HMIS data to inform its work.

- Denver agencies are also required by law not to provide certain data to the public, such as confidential and privacy information related to juveniles, sexual assault victims, and medical information protected by HIPAA, which may include disability-related information. See also Response to Recommendation 27 regarding the Public Safety Enforcement Priorities Act, which protects information regarding immigrations status.

- The way that Denver agencies use data to assist the populations they serve, including to identify and mitigate disproportionate impacts, is specific to each agency and is detailed in response to many of the Recommendations, including Recommendations 11, 13, 17, 19, 30, 31, 43. Additional information is available in the Response to “Transforming Public Safety” Recommendations dashboard.
RECOMMENDATION 21

“Adopt the Task Force’s definition of “public safety” and “public health & well-being” in relevant source documents including but not limited to charter and legislation.”

“**What is public safety?**

*This is the fundamental question these 112 recommendations attempt to answer.*

**Our definition:** Public safety ensures that all members of the community decide how to organize a social environment that provides the freedom to live and thrive with the protection and support of social, physical, mental and economic well-being. Safety is not a function of armed paramilitary forces with a proven track record of racism and violence. Public safety prevents, reduces, and heals harm.” (Recommendations For Transforming Public Safety In Denver pp. 3 and 49).

**KEY AGENCIES** – Department of Public Safety; Denver Department of Public Health and Environment

**EXECUTIVE BRANCH RESPONSE STATUS** – Decline as described below

**Response Highlight**
- The Executive Branch declines to adopt this Recommendation. The Executive Directors of the Departments of Public Safety and Public Health & Environment will review their Departmental guidance statements to make sure they reflect the values of how City services are delivered.

**Executive Summary**
- The Denver Executive Branch declines to adopt the Task Force’s definition of public safety and “public health and well-being.” However, the Executive Directors of the Departments of Public Safety and Public Health & Environment will review and revisit their Departmental guidance statements to ensure they accurately reflect the values of how these essential City services are delivered. Any changes reflected in those statements will be posted as an appendix to this response.
- The strategic vision and priorities for the City are established by the Mayor, City Council, and other elected officials who are selected by the Denver community to reflect their values and priorities. Leadership for agencies and departments establish vision, mission, purpose, and value statements to align their work with the City’s strategic vision and priorities, as well as the best practices and community considerations specific to their areas of service delivery.
- Guidance statements must be living concepts that adapt to reflect changing needs and priorities. Guidance statements influence how the work of the City is done, which should be expected to change over time as community needs and expectations evolve.
RECOMMENDATION 22
“Guarantee language access in an individual’s native language, including American Sign Language, for all individuals interacting with the Department of Safety or any department or division within. Adopt procedures requiring police use of official, Americans with Disabilities Act compliant language access services when taking enforcement action.”

KEY AGENCIES – Office of Immigrant and Refugee Affairs; Human Rights & Community Partnerships; Department of Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – In progress to the extent feasible, as outlined below

Response Highlight
- The Office of Immigrant and Refugee Affairs ("DOIRA") has a language access toolkit training for City agencies to create an accessibility plan.
- Denver is strongly committed to making services and information available to everyone.
- Citywide evaluation for accessibility under the Americans with Disabilities Act ("ADA") is underway.
- Denver Police Department ("DPD") and Denver Sheriff Department ("DSD") policies related to contacts with persons with disabilities are detailed in the Executive Summary.
- Denver 9-1-1 offers services to support access such as emergency alerts, Smart 911, Text to 911, and others.
- The Office of Sign Language Services works with DPD and DSD and at the State level to make sure there are more qualified interpreters available, especially after hours and weekends.

Executive Summary
- The Office of Immigrant and Refugee Affairs ("DOIRA") has a language access toolkit training that can be used by City agencies to create a language access and implementation plan. The Language Access program under DOIRA provides guidance and subject matter expertise to the entire City on language access compliance and overall programming. This includes supporting agencies and offices with technical assistance and review of their language access plan, development and implementation, translation/interpretation vendor selection, language determination, training as needed, targeted neighborhood and community engagement strategies, and connection to non-English media.
- Denver’s effort to develop a language access program is an integral part of ensuring that the City of Denver is an inclusive City that integrates social equity, race, immigrant integration, and social justice into policies, practices, programs, and budgetary decisions to create equitable outcomes. This program is key in ensuring equitable communication, distribution of information, benefits, services, and resources offered by all City agencies to all Denver residents regardless of English proficiency. This program aims to serve the 37% of Limited English Proficient (LEP) Denver residents who identify as speaking English “less than very well.”
- Denver’s Comprehensive Plan 2040 describes one of its main visions for inclusivity as, “ensuring all Denver residents have safe, convenient, and affordable access to basic services.” One of the strategic goals for this vision includes, “improving equitable access to City resources and City
meetings through proactive and transparent communications, easy-to-access information and materials available in more than one language.”

• Denver is strongly committed to making City services and information about those services available to everyone, regardless of language barriers. This commitment stems from overall City goals of efficient and effective government, community engagement, and customer service. Language Access means ensuring all Denver residents receive information published by the City in a form that the resident understands so that every resident receives critical information and understands the City processes and resources available.

• Citywide evaluation for accessibility under the Americans with Disabilities Act (“ADA”) program access policies is underway through the Division of Disability Rights, which looks at public-facing programs that interact with the community and whether they are accessible to community members. Identification of potential gaps and recommendations are forthcoming from this assessment.

• The Denver Police Department (“DPD”) and Denver Sheriff Department (“DSD”) have policies describing procedures when interacting with persons with disabilities, or where there is a barrier to communication, to make sure the actions from law enforcement personnel are understood and appropriate.
  o DPD Operations Manual 104.31 At-Risk Persons – Disabled Persons – Persons with Disabilities
  o DPD Operations Manual 104.37 Persons with Limited English Proficiency
  o DPD Operations Manual 120.04 Bilingual Officer Program
  o DSD Department Order 1.00.1012(4)(C) - (E) Inmate Intake and Booking
  o DSD Department Order 1.00.1016 Inmate Use of Telephones
  o DSD Department Order 1.00.1019 Inmates with Disabilities / Americans with Disabilities Act
  o DSD Department Order 1.00.2000 Bilingual Certification
  o DSD Department Order 1.00.8001 Medical or Special Transportation of Inmates

• After-hours and weekend American Sign Language (“ASL”) interpreter access remains a challenge for all Colorado law enforcement agencies due to extremely strict certification requirements under State law and a very limited number of interpreters who have the required credentials.
  o The Office of Sign Language Services is working at the State level to explore a possible rules change defining a qualified interpreter for certain police matters in an effort to maintain an appropriate level of interpreter credentials and at the same time increase the number of qualified interpreters for after-hours and weekend needs
  o The Office of Sign Language Services is also exploring options for video-based interpreter service vendors to ensure they would be providing qualified interpreters that meet State law requirements.

• Additionally, Denver 9-1-1 offers various services to support access to emergency public safety services such as emergency alert notifications, Smart 911, Text to 911, and services for persons with disabilities. More information is available here. Denver 9-1-1 pays employees holding a bilingual certification credential an extra stipend and utilizes a telephonic language line service to reduce language access barriers to emergency public safety services.

• The Department of Public Safety is committed to supporting bilingual opportunities (including basic ASL training) to all interested employees and supporting efforts for video-based interpretation with qualified interpreters to increase options for effective communication for personnel and the communities they serve.
RECOMMENDATION 23
(Co-reference with Recommendations 1, 2, & 8)
“Develop a grant-making division within the Department of Safety that includes community decision-making via a participatory budgeting model to re-allocate any dollars diverted from police budgets or jail bed reductions. This could mirror the Crime Prevention & Control Commission with more community representation rather than the status quo of heavy City agency representation.”

KEY AGENCIES – Office of the Mayor; Department of Public Safety

EXECUTIVE BRANCH RESPONSE STATUS – Other, as described below

Response Highlight
• See the Response to Recommendation 8 (CPCC and Caring For Denver roles and responsibilities); Response to Recommendations 1 and 2 (Office of Community Engagement assessment); Response to Recommendation 28 and Response to Recommendation 102 (Participatory Budgeting pilot).

Executive Summary
• See the Response to Recommendation 8 regarding the roles and responsibilities of the Crime Prevention and Control Commission (“CPCC”) and the Caring For Denver Foundation.
• See also the Response to Recommendations 1 and 2 regarding external assessments of feasibility, scope, and need for a potential Office of Community Engagement and/or an Office of Neighborhood Safety, as well as current community engagement and communication efforts across the Executive Branch agencies.
• The Executive Branch has piloted a Participatory Budgeting process, which is described in the Response to Recommendation 28 and the Response to Recommendation 102.
RECOMMENDATION 24
“Dedicate Community Engagement budgets in all Department of Safety entities to public awareness campaigns about alternative emergency responses (e.g. STAR, Colorado Crisis System, Suicide Prevention, etc.) and streamline emergency triaging of calls by 911 operators to appropriate first responders.”

KEY AGENCIES – Department of Public Safety; Denver 9-1-1; Denver Fire Department; Denver Police Department; Denver Sheriff Department; Community Corrections Division; Public Safety Youth Programs Division; Office of Community Violence Solutions

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:
- The Department of Public Safety agencies manage community outreach and education campaigns through cross-agency coordination. For example, Start By Believing and the recent Public Safety recruitment campaign.
- The Public Safety agencies each have community and media liaisons to support engagement and communication.
- Denver 9-1-1 Communications prioritizes appropriate triaging of calls to alternative response programs in several ways, as expanded in the Executive Summary.
- In 2022, the Department of Public Safety will launch a community information campaign featuring “Did You Know” information on public safety resources and alternative service delivery programs.

Executive Summary
Policies and procedures currently in place or planned:

Current State
- Individual agencies within the Department of Public Safety umbrella currently manage community outreach and education campaigns with campaign-specific cross-agency coordination. Agencies use multiple platforms, including creation of flyers/posters, use of print or billboard advertisements, creation of videos and social media postings, in-person events and community meetings, and ride-along/shift-shadowing or community experience opportunities for individuals and groups. Some campaigns are large-scale efforts coordinated across multiple City and partner entities (for example, Start By Believing and the recent Public Safety recruitment campaign). Other campaigns are specific to areas of service delivery or operations specific to an agency or workgroup (for example, Lock Out COVID Domestic Violence or Lock Out Crime).
- Individual Public Safety agencies employ dedicated community and media outreach liaisons to support their engagement and communication efforts. These liaisons also work together to align public safety communication and community outreach and education planning efforts on cross-agency initiatives. To further support this coordination and a strategic approach to the work, the Executive Director of Public Safety’s Office recently hired a Community & Government Affairs Manager with a strong background in community capacity-building, serving diverse populations, and fostering cross-sector relationships.
• Denver 9-1-1 Communications has prioritized appropriate triaging of calls to alternative response programs through several mechanisms. Emergency Communication Technicians (ECTs) and Dispatchers have been trained on new resources, like the Support Team Assisted Response (STAR) Program, including development of familiarity with the types of calls for service when it is appropriate for civilian responders to provide assistance. More information about STAR can be found here. A STAR Processing Guide was implemented in June 2020, which provides specific guidance and instructions for appropriate triaging of STAR calls for service. When an ECT determines that a call is STAR-appropriate, they enter a shorthand code into the call notes, which automatically alerts the dispatcher that STAR should respond. A clinician has also been hired at Denver 9-1-1 Communications to manage this process and expand the use of civilian response in Denver.

**Planned Implementation**

• During 2022, the Department of Public Safety will launch an ongoing community information campaign specifically featuring “Did You Know” information on public safety resources and alternative service delivery programs. Examples of content include the below items, which will be shared publicly through a variety of platforms:
  o When to Call 911
  o Text to 911
  o SMART 911
  o Support Team Assistance Response (including non-911 access number)
  o Street Enforcement Team (including how to request enforcement)
  o Non-911 Reporting Tools (e.g. – 311, Pocketgov)
  o Options for telephone reporting or online reporting for non-emergency crimes
  o Hate Crime Hotline (information available here)

• The Department of Public Safety will also work to amplify and share partner organization information campaigns such as Colorado Crisis Services, Safe2Tell, Operation Veteran Strong, and other non-City resources and supports.
RECOMMENDATION 25

“Provide aligned or joint trainings to community-based, City-based and state-based emergency responders and victim’s services responder teams that connect and build cross-entity capacity to minimize and/or eliminate a child’s trauma and family separation; and connect caregivers to community-based support services in child protection and immigration cases.”

KEY AGENCIES – Denver Human Services; Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent feasible and allowable under the law

Response Highlights

- This [infographic](#) provides an overview of Child Protective Services processes for involved families.
- Denver Human Services (DHS) aims to minimize family separation if in the best interests of the child. DHS provides support to families with the goal of family unification.
- There are already agreements between the relevant departments, including DHS, the Denver Police Department (DPD), the Denver District Attorney’s Office, and Denver Health and Hospital Authority.
- DHS will consider options for potential further collaboration in immigration cases.

Executive Summary

- This [infographic](#) provides an overview of Child Protective Services processes and procedures for involved families. When child welfare receives an allegation of suspected abuse or neglect, there is an initial review of the concerns to determine whether an assessment of the concerns is necessary. Depending on the outcome of the review, there may be no contact with the family; the family may be offered community-based services; or further assessment may be required by a social caseworker, including an evaluation of child safety, family strengths, and the need for services. After this assessment, the family may be offered community-based or prevention services, and if it is determined that parents are able to prevent future maltreatment, the assessment is closed. If the assessment identifies a need for ongoing involvement (which may or may not involve the court system), a social caseworker provides support and resources to strengthen the family and to keep children safe. If it is determined that the child may safely remain with their family, supportive services may be provided or referred within their community. If the child needs to be placed outside of the home due to concerns for their safety, kinship care is prioritized over foster care and services are provided to the child and family to work towards the goal of reunification.
- Denver Human Services (DHS) Child Welfare Division aims to minimize family separation when consistent with the best interests of the child and to provide supportive services to families with the goal of keeping or reunifying the child with their family.
- Operating agreements, including provisions on information sharing, case consultation, and agency coordination are already in place between the relevant departments, including DHS, the Denver Police Department (DPD), the Denver District Attorney’s Office, Denver Health and Hospital Authority, and others. These agencies provide training to their staff on processes, procedures, and coordination where needed.
• There is potential for further collaboration with other agencies and jurisdictions in immigration cases and Denver Human Services will consider options for potential further collaboration.
RECOMMENDATION 26

“Increase the number of co-responder and STAR teams citywide based on demand and eligibility of citizen-initiated requests for service as indicated by historical 911 and crime type data.”

KEY AGENCIES – Department of Safety; Department of Public Health and Environment

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent feasible; in progress as outlined below

Response Highlights

- The Co-Responder Program started in the Denver Police Department (“DPD”) in 2016 and has greatly expanded since then.
- An expansion for the Support Team Assisted Response (“STAR”) Program piloted in 2020 has been approved and funded.
- Funding has been identified to begin evaluations of both the Co-Responder and STAR Programs in 2022.
- Denver is working to align future programs with State efforts in this area so there will be more consistency across Colorado.
- It is important to recognize that not every 9-1-1 call is automatically a best fit for any one response resource.

Executive Summary

- The Co-Responder Program started in the Denver Police Department (“DPD”) in 2016 with three clinician resources. In the past six years, the Program has expanded to forty clinicians and case managers and now provides co-response supports for DPD through the Crisis Intervention Response Unit (“CIRU”) as well as the Denver Sheriff Department, Denver Fire Department, and RTD. The expansion emphasis has been on building capacity across the City and expanding the days and hours for co-responder support availability. More information about the DPD Co-Responder Program is available here.
- The Support Team Assisted Response (“STAR”) Program was piloted in 2020 with one clinician/medic team working limited hours and geographic scope. The pilot was based on certain characteristics presented during calls to 9-1-1 that indicated the STAR team was the most appropriate resource to address the situation, such as mental health issues. The City approved and funded an expansion for STAR, which is currently in progress. The STAR Program expansion has been recommended based on data collected during the pilot about existing utilization and locations of Police-referred calls. The STAR Advisory Committee is actively engaged in reviewing the recommendations and progress of the STAR Program expansion. More information about the STAR Program is available here.
- Funding has been identified to begin full programmatic evaluations of both the Co-Responder and STAR Programs in 2022, including recommendations for future growth/expansion and how these programs have impacted criminal justice involvement and quality of life for members of the Denver community.
- Work is ongoing at the State level to revamp coordination and services provided by clinician-based alternative response and supportive response programs across the State. Denver is
working to align future program logistics with State contracts and efforts in this area so there will be more consistency across Colorado for persons in need of support resources.

- It is important to recognize that not every 9-1-1 call is automatically a best fit for any one response resource. Expansion means increasing capacity for many resources to be available. Denver 9-1-1 will still assess all calls based upon the information available at the time to identify what appears to be the right resource(s) to respond for safety of the caller, others who may be nearby, and responders.
RECOMMENDATION 27
“Strengthen protections for immigrants from any nexus between Denver Police Department and federal Immigration and Customs Enforcement (ICE).”

KEY AGENCIES – Department of Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented as outlined below

Response Highlight
- Executive Order 116 and Executive Order 142 provide the Executive Branch’s Immigration Policy.
- The Public Safety Enforcement Priorities Act prohibits city funds or resources from being used to assist in enforcement of federal immigration laws, with certain exceptions.
- Information about the Denver Immigrant Legal Services Fund can be found here. Information about the Office of Immigrant & Refugee Affairs can be found here.

Executive Summary
- Executive Order 116 establishes the Immigration Policy for the Executive Branch of the City & County of Denver. The Executive Order affirmatively states that Denver: respects the diversity of its residents; will assure that the human rights of its residents are protected; will not tolerate unlawful discrimination in any form; and remains fully committed to the delivery of services to all residents, regardless of immigration status.
- Further, Executive Order 142 “affirms Denver’s commitment to stand with immigrants and refugees and maintains Denver as a welcoming city where everyone can feel safe and thrive.” The Executive Order also:
  - Directs the establishment of a legal defense fund for indigent individuals threatened with or involved in removal proceedings;
  - Orders the Denver Sheriff Department (“DSD”) to no longer seek federal funds that require the gathering and dissemination of information about the national origin, immigration or citizenship status of persons held in Denver jails;
  - Directs that all departments, agencies, employees, officers, boards, and commissions ensure equal access to facilities, services, and programs, without regard to any person’s national origin, immigration or citizenship status to the maximum extent permitted by law;
  - The Order commits Denver to: protecting victims and witnesses of crimes regardless of their national origin, immigration or citizenship status; assisting children and families who become separated; protecting the rights and liberties of immigrants and refugees; and coordinating City actions for immigrants and refugees, as detailed in the Order.
  - The Order explicitly directs the “Denver Police Department [to] continue to protect all people of Denver, and those travelling through Denver, regardless of their national origin, immigration, or citizenship status.”
  - The Order required trainings for City personnel with roles in the criminal justice system and mandated reporting of “any efforts made known to [executive directors or heads of department/agencies/offices] by federal immigration enforcement officials from ICE, U.S. Customs and Border Protection, or U.S. Citizenship and
Immigration Services to enforce civil immigration laws with the cooperation, use, or support of City resources.”

- City Council enacted the Public Safety Enforcement Priorities Act in 2017. The Act requires that “no department, agency, board, commission, officer or employee of the city, including without limitation, county court administrative and clerical employees, probation, pre-trial services and community corrections, shall use any city funds or resources to assist in enforcement of federal immigration laws.” Specific prohibitions and exceptions are delineated in the Act.

- All City employees were required to take training explaining the requirements and obligations of Executive Orders 116 and 142 and the Public Safety Enforcement Priorities Act. The City Attorney’s Office also created a hotline and email address (CAO.Immigration@denvergov.org) for questions or issues related to these Orders and laws.

- More information about the Denver Immigrant Legal Services Fund, which is administered by the Denver Foundation, can be found here. More information about the Office of Immigrant & Refugee Affairs, which includes programs and resources to support and empower immigrant and refugee community members, can be found here.

- Additionally, in 2019, the Colorado legislature passed HB19-1148, which required code changes to the Denver Revised Municipal Code (D.R.M.C.). The changes to the D.R.M.C. built on past reform efforts Denver had already undertaken.
  - HB19-1148 changed the maximum sentence for a municipal offense to 364 days. The previous maximum was one year, which had immigration consequences for anyone with a legal status; legal permanent residents; those with student visas; and those with work visas. Under federal law, a noncitizen is deportable for a single conviction of a crime involving moral turpitude committed within 5 years of admission if the offense has a potential sentence of one year or more. The purpose of this law and previous Denver reform efforts was to protect against the consequence of deportation related to the commission of a municipal offense for people otherwise here legally.
  - Previously, in 2017, Denver also adjusted sentencing structures with stakeholder feedback. Rather than one uniform penalty structure, different classes of offenses were structured as follows:
    - General penalty – unless otherwise defined as Class 1 or 2, max sentence is 300 days;
    - Class 2: low level “quality of life offenses” have max sentence of 60 days;
    - Class 1: limited number of extraordinary risk offenses that involved violent or bias motivated crimes, maximum of 365 days;
    - The code changes pursuant to HB19-1148 set the max sentence for Class 1 offenses at 364 days, fines remained unchanged;
    - Nothing in this or previous legislation limited alternative sentencing options that are otherwise available to the court.
RECOMMENDATION 28
“Determine ‘authorized strength’ and Department of Safety needs by annually conducting Public Safety, Health & Well-being assessment which will include an independent, statistically valid survey of community members and frontline police officers in each police precinct about community needs, community satisfaction and overall safety, health and well-being perceptions. Survey will gauge public perceptions based on newly adopted definitions of public safety & well-being.”

KEY AGENCIES – Department of Public Safety; Department of Finance

EXECUTIVE BRNCH RESPONSE STATUS – Previously Implemented in part, as outlined below

Response Highlight
- Each year, Denver participates in the National Community Survey (“NCS”) measuring the quality of life for residents. The survey includes questions related to public safety. Examples include perceived and actual satisfaction with:
  - Law enforcement,
  - Traffic enforcement,
  - Emergency medical services, and
  - Crime prevention.
- Note that the survey was not conducted in 2020 or 2021 to address budget savings, but will resume in 2022.
- The Department of Public Safety uses the NCS to get feedback about how community members feel about public safety services.
- Authorized strength is the budget term that identifies the number of staff doing public safety work in Department of Public Safety agencies such as the Denver Police Department (“DPD”) and Denver Sheriff Department (“DSD”).
- Agencies use several factors, mostly workload, when evaluating authorized strength.
- Authorized strength changes are part of the Citywide annual budget process.
- See also Response to Recommendation 102 for more detail about roles and responsibilities related to the overall budget process.

Executive Summary
- Each year, Denver is one of 500 communities across the country that participates in the National Community Survey (“NCS”) measuring the quality of life for residents and benchmarking Denver against 499 other communities. The survey includes questions related to public safety, such as perceived and actual satisfaction with law enforcement, traffic enforcement, emergency medical services, and crime prevention. The annual survey is conducted by mail and online in both English and Spanish at the end of the year (November and December). Results are posted on the Department of Finance website. Note that the survey was not conducted in 2020 or 2021 to address budget savings, but will resume in 2022.
- The Department of Public Safety utilizes the NCS to obtain feedback about how community members feel about the Department’s public safety work in the core areas of prevention, response, enforcement, and correction.
- Authorized strength is the term used to identify the budgeted number of operational personnel within the largest Public Safety agencies. The Department also tracks effective strength, which is the number of operational personnel who are at full duty capacity. For
example, newly hired personnel in a recruit academy status count towards an agency’s authorized strength, but not its effective strength, because they are not yet fully trained and capable of performing the full scope of their duties.

- Authorized strength changes for the Denver Police Department (“DPD”), Denver Sheriff Department (“DSD”), and other Public Safety Departments are determined collaboratively by the agency and the Department of Finance and presented to the Mayor for consideration in the Citywide annual budgeting process (see also Response to Recommendation 102 for additional detail about roles and responsibilities related to the budget process). The Mayor’s budget proposal is reviewed and approved by City Council. City Council has the ability to ask questions and request changes to the proposed budget. City Council also holds public hearings before adopting the annual City budget. Authorized strength numbers and requested changes are published annually by the Department of Finance in the Budget Book.

- Agencies utilize several factors, primarily workload, when evaluating authorized strength. Some of the other operational factors considered by DPD and DSD when reviewing authorized strength include:
  
  o The needs of the community and officer workload during their given shift;
  o The response times to priority 0 and 2 calls for service, which are calls to Denver 9-1-1 reflecting imminent or life-threatening danger;
  o Case clearance by detectives, which means that an investigation has closed;
  o Auto accident and crime rates;
  o The impact of specialized and innovative units within DPD;
  o Operational requirements for jail facility management to support health, safety, and movement between locations. Some examples include:
    - Ratios of deputies to persons in custody in housing units;
    - Transportation functions between jail facilities and courts, other jurisdictions, or the hospital;
    - Staffing levels based on inmate classification levels, jail population, and safety / security of inmates and staff.

- The Department of Public Safety’s Finance and Strategic Resources Division (“Safety Finance”) provides support to its agencies, including DPD and DSD, in monitoring and predicting staffing levels. Safety Finance reviews staffing needs annually with the agencies in accordance with five-year strategic staffing plans based on the authorized strength factors and hiring and retention trends. Safety Finance will work with the agencies to review results from the NCS and other community feedback to include in annual staffing reviews as applicable.

- The City is also committed to receiving and incorporating community feedback regarding public safety services and perceptions of safety. We will continue exploring efforts to obtain that feedback, including options for additional questions on the existing NCS or similar surveys, coordinating issue- and agency-specific feedback efforts as appropriate, and exploring Department-specific survey and feedback opportunities. The Denver community can also get involved in Participatory Budgeting regarding capital projects and contribute to ideas and priorities for spending public money. The Department of Finance recently provided an update on federal spending to City Council, including the community-identified spending priorities.
RECOMMENDATION 29
“Decentralize and fund courts embedded in communities that are based in restorative practices, transformative justice, and conflict resolution, with community input into judicial assignments through evaluations of procedural justice.”

KEY AGENCIES — Denver City Attorney’s Office; Office of the Municipal Public Defender

EXECUTIVE BRANCH RESPONSE STATUS — Previously implemented in part, to the extent feasible; in progress

Response Highlight
- There are specialty and problem-solving courts and events in Denver, including Denver Outreach Court; Veterans Court; and “Turnover a New Leaf” Clinics.

Executive Summary
- There are specialty and problem-solving courts and events that currently exist in Denver, including:
  - Denver Outreach Court, part of the City and County of Denver Courts, is designed to increase stabilization and reduce future interactions with the justice system for individuals experiencing homelessness. Involved individuals are also offered available services and shelter. The court helps individuals resolve municipal and low-level citations or warrants and provides direct access to mental health services and enrollment in Medicaid. Community service options are also available to complete court requirements. Instead of requiring people to come to a courthouse, which for those experiencing homelessness can often be difficult, the Outreach Court is held every other Wednesday at the Central Public Library and/or Denver Rescue Mission to meet people where they are. Anyone can come in on these dates and they will be added to that day’s docket. The goal is to provide better access to the court system in an effort to avoid further involvement with the criminal justice system. Connect on social media here.
  - There is a Veterans Court in Denver, which is a type of problem-solving court designed to serve justice-involved military and former-military members with mental health needs and substance use disorders, where appropriate, through intensive supervision and treatment to increase the likelihood for successful community reintegration. There is also a Veterans Court Mentor Program.
  - “Turnover a New Leaf” Clinics: As a part of Mayor Hancock’s mission to promote equity in Denver, Mayor Hancock, the Department of Excise and Licenses, the Denver City Attorney’s Office, and the Denver District Attorney’s Office created the “Turn Over a New Leaf” program to mitigate the negative effects of low-level marijuana convictions obtained before legalization. Through this program, individuals can request to have certain low-level marijuana convictions vacated, dismissed, and sealed.
  - Outside of the Executive Branch, the Denver District Attorney’s Office has provided a resource list of other problem-solving courts in Denver, which serve the Denver criminal justice system, including:
    - Drug Court—District Court: Drug Court is a specialized court designed to provide offenders the opportunity and responsibility to manage their substance abuse
problem through probation supervision and close judicial oversight. Potential participants undergo screening by the District Attorney’s Office to determine their eligibility for Drug Court. The Drug Court process is designed to move quickly so that offenders can begin treatment and supervision. An eligible offender who wants to take part in Drug Court pleads guilty to the charges at second advisement (a hearing held within days of an arrest) and is immediately sentenced to Drug Court supervision and mandatory treatment.

- **RESTART—District Court:** The RESTART (Recognizing and Establishing Smart Treatment Alternatives for Recovery and Transition) Program is for individuals arrested on their 4th or subsequent DUI, DWAI, or DUI Per Se offense. An alternative to lengthy incarceration, it is a multi-phase program that includes conviction, jail, and probation sentence, intensive community supervision, treatment, and substantial judicial oversight. Potential participants undergo a separate pre-sentence screening by the District Attorney’s Office to determine their eligibility for the program. Upon entry into the program, participants serve a jail sentence, and while in jail, participate in a substance use treatment program. Upon release, participants are referred for treatment with one of the contracted providers, which includes, but is not limited to, individual counseling and group therapy. While the RESTART docket is part of the Denver Adult Drug Court, RESTART has a different phase structure and other requirements that differ from those in the drug court program.

- **Sobriety Court—County Court:** Sobriety Court is a special treatment court in Denver County for misdemeanor offenders. It was developed to reduce the recidivism of drunk driving in Denver. This program is voluntary and eligibility for the program is based on a legal screening. It consists of three phases and is approximately 19-24 months in length.

- **DIVERT Drug Treatment Court—County Court:** Alternative to incarceration by providing a court-supervised probation program for substance-dependent, high-risk, and high-need offenders. The DIVERT court sentences offenders to the RISE program in Denver County Jail for 90 days, with probation for a minimum of three years.

- **HEM (Helping, Encouraging, and Motivating) Court—County Court:** serves those charged with misdemeanor 1 drug possession charges with a focus on harm reduction, rather than punishment.
RECOMMENDATION 30
(Co-reference with Recommendations 19 & 31)
“Ensure sufficient investment in both inpatient and outpatient treatment and services for mental health and substance abuse disorders.”

KEY AGENCIES – Department of Public Health and Environment; Department of Human Services

EXECUTIVE BRANCH RESPONSE STATUS – Other

Response Highlight
- Mental health and substance abuse treatment and services exist at the state and local level and in the public and private sectors.
- The State mental health system is under renovation. The changes will impact Denver’s investment in behavioral health services. Additional information is available here and here.
- Examples of current Denver mental health and substance abuse programs and services are detailed in the Executive Summary.
- The Community and Behavioral Health (CBH) Division within the Denver Department of Public Health and Environment (DDPHE) is performing a Mental Health Needs Assessment directed to the community. This Assessment will direct future services.

Executive Summary
- Investment and barriers to investment in inpatient and outpatient treatment and services for mental health and substance abuse disorders exist at the state and local level and in the public and private sectors. The Statewide mental health system is undergoing significant renovation, which will impact investment in behavioral health in Denver. Specifically, the State has designed and is in the process of launching the Colorado Behavioral Health Administration to transform and improve behavioral health services. Additional information is available here and here.
  - The goal of the Colorado Behavioral Health Administration is to better coordinate/make consistent strategies of care across the State (currently behavioral health supports and programming look different county to county and region to region);
  - The new approach will change the role of local governments and jurisdictions in the coordination of and conversations around behavioral health care;
  - The new approach will also address strategies around alternative support and response teams like co-responders;
  - The State is also establishing a framework for allocation and management of opioid settlement dollars, which will include requirements for collaboration and coordination with other counties and reporting requirements about the investment of funds. Additional information is available here.
- Some examples of current City investments regarding services for mental health and substance abuse disorders are:
  - The City has allocated federal funds received for COVID-19 recovery for behavioral health assessments and supports for the Denver community. More information about how the City is spending its federal ARPA funds can be found here.
The City invests in mobile outreach and response teams like the Support Team Assisted Response ("STAR") Program and Wellness Winnie.

The City also contracts with alternative facilities to support persons in mental or behavioral health crisis, including Denver CARES, the Behavioral Health Solutions Center, and the planned Assessment Intake Diversion ("AID") Center.
- See also the Responses to Recommendations 5, 6, 26, 36, 50, and 71 on the public-facing dashboard.

The Community and Behavioral Health ("CBH") Division within the Denver Department of Public Health and Environment ("DDPHE") is identifying gaps in behavioral health services that can be filled by additional resources (e.g., ARPA funds) through a Mental Health Needs Assessment directed to the community. The results from the forthcoming Mental Health Needs Assessment will direct programming in the long-term.

While results from the Mental Health Needs Assessment will direct long-term programming, CBH also utilizes the knowledge and experience of staff working in the community today to develop short-term programs and resources. For example, the following are under development with a target implementation date of 2023:
- School-based mental health educational sessions with presenters from the creative & clinical communities;
- **HOPE Squad** Elementary School Pilot (peer-to-peer suicide prevention program);
- Expansion of Naloxone distribution and other harm reduction tactics;
- Expansion of overdose prevention education via multiple medial channels;
- Behavioral health practitioner network pilot;
- Youth Mental Health First Aid trainings;
- Mental Health Therapy Assistance for youth and their families.
RECOMMENDATION 31
(Co-reference with Recommendations 19 & 30)
“Remove limits to long term health, mental health and substance abuse services.”

KEY AGENCIES – Department of Public Health and Environment; Denver Human Services

EXECUTIVE BRANCH RESPONSE STATUS – Other

Response Highlight
- There are fiscal and jurisdictional barriers outside of Denver’s control. However, Denver agencies advocate for more sustainable services to the communities that we serve, offer various resources, and empower residents, as described in the Executive Summary.
  - Moving forward, the Executive Branch agencies will also:
    - Identify and assess gaps and develop a planned response;
    - Expand educational opportunities;
    - Increase cross-agency collaboration and services through the Denver ReCAST (Resiliency in Communities Affected by Stress and Trauma) grant.

Executive Summary
- When it comes to removing limits to long term health, mental health, and substance abuse services, there are fiscal and jurisdictional barriers outside of Denver’s control. However, Denver agencies advocate for more sustainable services to the communities that we serve, offer various resources, and empower residents to seek out available services, as discussed below.
  - Related to advocacy, Denver Human Services cross-promotes resources and opportunities via different media channels, such as:
    - Denver Human Services Community Digest: The digest provides community and partners with access to mental health resources, State and Federal program updates, and additional resources. A subscription to the Community Digest or access to past issues is available here.
    - Assistance with matters specific to youth mental health can be found in the DHS Youth Corner I Matter Platform, which is available here.
  - Related to community and citizen empowerment, the Department of Public Health and Environment offers tools and resources to community, such as:
    - The Community Behavioral Health (“CBH”) Division of the Department of Public Health and Environment provides free trainings and a Community Resource Guide, which can be found here;
    - CBH is also developing several proposals to support community services and engagement around behavioral health needs in the short- and long-term, which are detailed in the Response to Recommendation 30;
    - CBH will host the City’s first youth-focused wellness summit in May 2022 with a focus of suicide awareness and prevention. More information about the We Got This! Summit and CBH’s suicide prevention work can be found here.
  - Regarding the reduction of barriers within Denver’s jurisdiction, the City is working to collect data and perform a needs assessment, including engagement with the community
to better understand the extent to which stigmas exists in accessing services. More information can be found in the Response to Recommendation 30.

- Moving forward, the Executive Branch agencies will also:
  - Take information from the Stigma campaign, need assessments, and We Got This! Summit to identify and assess gaps and develop a planned response;
  - Expand educational opportunities for impacted populations, including youth;
  - Increase cross-agency collaboration (see the Response to Recommendation 19) through the Denver ReCAST (Resiliency in Communities Affected by Stress and Trauma) grant, which was awarded through the Substance Abuse and Mental Health Services Administration (“SAMHSA”). CBH will receive $5 million over 5 years to implement the program.
  - The purpose of this program is to assist high-risk youth and families and promote resilience and equity in communities that have recently faced civil unrest through implementation of evidence-based violence prevention, and community youth engagement programs, as well as linkages to trauma-informed behavioral health services. The goal of the ReCAST Program is for local community entities to work together in ways that lead to improved behavioral health, empowered community residents, reductions in trauma, and sustained community change.
  - CBH will use funding to support outreach activities to at-risk youth and families through the Wellness Winnie Mobile Unit, which is staffed by a Licensed Clinician, a Peer Professional, and Case Manager. CBH will also use funds to support data analysis activities for its Youth Suicide Prevention Program.
  - The Denver Office of Financial Empowerment & Protection will use funding to support an Apprenticeship Transition Counselor in its new College and Career Accessibility Support Alliance (CCASA) program to provide guidance on skilled trade fields and linking students to industry-led apprenticeships.
  - The Department of Public Safety Youth Programs will use funding to compensate six youth, ages 16-24, to serve on the Youth Advisory Council for the youth violence prevention (YVP) work led by Denver’s Office of Children’s Affairs.
  - The Office of the Denver District Attorney will use funding to support a Restorative Justice Coordinator position to establish and organize the Restorative Justice Program’s policies and procedures for the management of cases.
  - Denver Human Services will use funding to support the Youth Empowerment Program, which is a new youth mentoring initiative, for ages 14-22. The funding will create a Youth Mentor position within the Community Impact Division of DHS.
  - IBS Center for the Study & Prevention of Violence (CSPV) University of Colorado Boulder researchers will partner with the Denver ReCast team to collect and report the performance measures required for this project, administer surveys for quality improvement purposes, and build the evaluation capacity of the stakeholders.
  - Denver Public Schools will use funding to support a clinical consultation and professional development position for school social workers and psychologist staff.
    - Adult and Youth Stakeholder Coalition Advisory Boards will be created, consisting of a diverse set of stakeholders, including law enforcement agencies, community leaders and members, family/youth representatives, local public agencies (e.g. behavioral health, law enforcement, health and human services providers, and other child, family, and community-serving providers) and other local partners (e.g. clergy and faith-based organizations, businesses, public or private universities or colleges, and non-profit organizations and youth representing neighborhoods heavily impacted by violence).
- Quarterly meetings will provide guidance and expertise on how to build community infrastructure to enhance resilience;
- The Youth Stakeholder Advisory Board will be facilitated by the Office of Children’s Affairs; 
- The grant will fund an Adult Stakeholder Coalition Advisory Board Facilitator; 
- Board members will receive a stipend for their service (to include 15 adults and 15 youth).

- The grant will also provide funding for Community-Based Services. CBH will implement a Request for Proposal (“RFP”) process after the creation of the community strategic plan to solicit additional community-based programming that relies on the expertise and insight of community stakeholders to 1) provide evidence-based youth violence prevention services, 2) promote opportunities for at-risk youth community engagement, and 3) increase linkages to trauma-informed behavioral health services for at-risk youth and their families.
RECOMMENDATION 32
“Expand employment opportunities for mental health, substance abuse, and co-occurring clients.”

KEY AGENCIES – Denver Economic Development & Opportunity; Human Rights & Community Partnerships

EXECUTIVE BRANCH RESPONSE STATUS – Previously Implemented as outlined below

Response Highlight
- The Denver Economic Development & Opportunity (DEDO) Workforce Services Division supports employment opportunities for the Denver community. Information is available here, including access to laptops and internet hotspots, virtual career building services, and personal advising.
- DEDO offers programs to increase employment opportunities for people with disabilities, jobseekers over the age of 50, youth, and new Americans, among others.
- Denver Human Rights and Community Partnerships (HRCP) provides services to support economic opportunity and financial security. More information can be found here.
- HRCP works with the Denver Sheriff Department to support persons in custody and transitioning back into community to reduce barriers and find success.

Executive Summary
- The Denver Economic Development & Opportunity (“DEDO”) Workforce Services Division provides and supports employment opportunities for members of the Denver community. Information is available here about the programs and services provided, including access to laptops and internet hotspots, virtual career building services, and personal advising.
  - Information on access to laptops and Wi-Fi hotspots is available here;
  - Information for virtual technology and digital literacy resources is available here;
  - Information on virtual job fairs and daily hiring events is available here;
  - Information on regional virtual training and education opportunities is available here.
- Personal advising is also available at the Denver Workforce Center in Montbello. Appointments can be scheduled here.
- Connecting Colorado is a free, public statewide database that matches job postings by employers hiring now with the skills and interests of every jobseeker.
- DEDO offers programs to increase employment opportunities for people with disabilities, jobseekers over the age of 50, youth, and new Americans, among many others. More information is available here. DEDO also funds and provides support directly to community non-profit organizations to support the needs of jobseekers.
- Additional information on Denver Workforce Services and the populations it serves is available here.
- Denver Human Rights and Community Partnerships (“HRCP”) also provides programming and services to support economic opportunity and financial security. For example, information on services provided by the Office of Financial Empowerment can be found here.
- HRCP works with the Denver Sheriff Department to support persons in custody and transitioning back into community to reduce barriers and find success.
- Both DEDO and HRCP work with community non-profit partners to provide direct and individual supports to job-seeking community members and to assist with overcoming barriers to services.
RECOMMENDATION 33
“Incubate employment programs for people with disabilities, including programs for those with intellectual and developmental disabilities.”

KEY AGENCIES – Denver Economic Development & Opportunity; Human Rights & Community Partnerships

EXECUTIVE BRANCH RESPONSE STATUS – Previously Implemented as outlined below

Response Highlight
• Denver Workforce Services has a network of partners and staff who are well-versed in the employment barriers that people with disabilities face. Assistance can be received at 720-337-WORK or workforce.development@denvergov.org.
• Denver Human Rights and Community Partnerships (HRCP) supports employment opportunities through the Commission for People with Disabilities, the Division of Disability Rights, and the Office of Financial Empowerment.
• Denver Human Services’ (“DHS”) Intellectual and Developmental Disabilities Equitable Access to Services (“IDDEAS”) program oversees taxpayer funds dedicated for the benefit of Denver residents with intellectual and developmental disabilities (I/DD) and their families. This work is detailed in the Executive Summary.

Executive Summary
• See the response to Recommendation 32 for information on the Denver Economic Development & Opportunity (“DEDO”) Workforce Services Division support of employment opportunities for members of the Denver community. Specific to career paths for people with disabilities, Denver Workforce Services has a wide network of partners as well as professional staff who are well-versed in the employment barriers that people with disabilities face. Additional and personalized assistance can be received at 720-337-WORK or workforce.development@denvergov.org.
• Denver Human Rights and Community Partnerships (“HRCP”) also provides programming and services to support employment opportunities for jobseekers through the Commission for People with Disabilities, the Division of Disability Rights, and the Office of Financial Empowerment & Protection, among others.
  o The Commission for People with Disabilities provides the following Employment in the City guide, which can be found here;
  o The Division of Disability Rights Resource Guide has employment resources beginning on page 20;
  o More information on services provided by the Office of Financial Empowerment can be found here.
• Denver Human Services’ (“DHS”) Intellectual and Developmental Disabilities Equitable Access to Services (“IDDEAS”) program oversees taxpayer funds dedicated for the benefit of Denver residents with intellectual and developmental disabilities (I/DD) and their families. DHS meets regularly with a community advisory council that makes recommendations to DHS in the following priority areas: gaps in essential services, housing, inclusion, mental health, and technology. Funds are utilized in numerous community projects that meet a variety of unique
needs as well as work to address community and systems gaps, including inclusive employment.

- From 2019 to present, IDDEAS has funded inclusion initiatives that offer community trainings and consultations that target organizations, clubs, and businesses in Denver. Typically, these opportunities are promoted individually through supported employment organizations/job coaches and individual contacts at companies. While some of these initiatives are wrapping up their work in 2022, DHS intends to continue programs that promote community inclusion, including I/DD inclusive employment.

- CTAT, LLC, provided an Inclusion in Employment community class series which offered eight (8) sessions from 2020-2022. In these sessions, residents with I/DD that participated in CTAT, LLC’s Presentation Skills training, were paid to participate as panelists in the community sessions. In the second contract term, this was expanded to include paying panelists from the first term to mentor and support new panelists for the second round of courses.

- Easterseals’ Diversity Inclusion Program (“DIP”) provided trainings for well over a dozen organizations interested in inclusive hiring practices and improving their opportunities for employing people with I/DD.

The IDDEAS program highly encourages employing, contracting with, and paying people with I/DD for their involvement or input. IDDEAS prioritizes funding programs that value and employ residents with I/DD in the course of their work. Denver encouraged this inclusion from Rocky Mountain Human Services (“RMHS”) and Point b(e) Strategies, community partners who each manage numerous subcontracts for varying community initiatives and mini projects. Examples of subcontractors funded by mill levy through partners whose focus is on employment or related skills-building include, but are not limited to:


- Point b(e) Strategies mini projects: Initiative for Inclusive Higher Education mentorship project, Narativ/Shining Beautiful storytelling project.

- In 2021, 62% of the projects Point b(e) funded had a project leader or someone on the project leadership team that identified as a person with I/DD. IDDEAS has extended this program for an additional two-year contract term with a budget of $600,000 to be distributed within the first funding application cycle opening spring 2022.

- Other projects that are currently funded by or have been funded by the IDDEAS program that can help improve employment opportunities for residents with I/DD include: financial health and decision making classes (offered at Denver Public Schools for transition age persons with I/DD and through day programs in the area); digital equity and skills to access and utilize technology; improved mental health and emotional regulation skills; headshots for persons that wish to have them in relation to their storytelling and advocacy work.

- IDDEAS follows the Colorado Office of Employment First (“COEF”) for assessment of what gaps may exist in Denver and how we can create effective programs that complement existing services, resources, and best practices. COEF offers trainings and tools to support inclusive, meaningful, and competitive employment for all people.

- Career Seekers with disabilities can find COEF employment resources here.
- Employers can find COEF resources on diversifying their workforce here.
RECOMMENDATION 34
“Require that behavioral health and primary-care physicians, and mental health clinicians, complete
trainings on serving people who identify as BIPOC, LBGTQIA, and TGI.”

KEY AGENCIES – Department of Public Health and Environment; Denver Human Services; Denver Sheriff
Department

EXECUTIVE BRANCH RESPONSE STATUS – Will implement as outlined below

Response Highlight
• Denver requires contractors to comply with non-discrimination standards, as described in
  Executive Order 8.
• Executive Order 101 requires the City to collect information from potential contractors about
  diversity and inclusiveness policies.
• Denver will add language to Requests For Proposals (“RFPs”) and contracts for behavioral, mental
  health, and medical services, requiring training on serving historically marginalized groups.

Executive Summary
• The City currently requires contracted service providers to comply with non-discrimination
  standards. Specifically, Executive Order 8, which establishes the contracting policies for the City,
  provides the following requirement:
  o “NO DISCRIMINATION IN EMPLOYMENT. In connection with the performance of work
    under this contract, the Contractor may not refuse to hire, discharge, promote or demote,
    or discriminate in matters of compensation against any person otherwise qualified, solely
    because of race, color, religion, national origin, gender, age, military status, sexual
    orientation, gender identity or gender expression, marital status, or physical or mental
    disability. The Contractor shall insert the foregoing provision in all subcontracts.”
• Additionally, Executive Order 101 requires the City to collect information from potential
  contractors about their diversity and inclusiveness policies. This information can be used as a
  factor in deciding whether the City will contract with a service provider. Memorandum A to this
  Executive Order (“101A”) describes the required language and data collection that is done as part
  of the Request for Proposal process, which is required before the City can award contracts worth
  $10,000 or more.
• The training requirement proposed by this Recommendation will be implemented by adding new
  language into RFPs and contracts for behavioral, mental health, and medical services, which will
  require that contracted service providers have taken or will take cultural
  sensitivity/responsiveness training on serving historically and currently marginalized populations,
  including BIPOC and LGBTQIA communities. City agencies will also be encouraged to add requests
  for information on such trainings to the Request for Proposal processes when they seek
  contractors for these services.
RECOMMENDATION 35
“Conduct a study that measures demographic disparities in provision of social services over the last 10 years of our City’s peak growth.”

KEY AGENCIES – Denver Human Services; Office of Financial Empowerment; Denver Department of Public Health & Environment

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; in progress

Response Highlights
- Denver has and will perform studies to understand the impacts of the City’s recent growth and disparities. Denver has or will use study results to improve community services and resources. Examples include:
  - Gentrification and involuntary displacement study;
  - Studies of data from the Denver Human Services Index;
  - A COVID disparities assessment;
  - A fines and fees equity evaluation;
  - A behavioral health stigma needs assessment;
  - Initiatives to address community and behavioral health needs using American Rescue Plan Act funds.

Executive Summary
- Denver has conducted multiple studies to understand the impacts of the City’s recent growth and any potential resulting disparities, including the examples below.
- See the Response to Recommendation 47 for information regarding various studies and reports conducted by City agencies regarding the impacts of gentrification and involuntary displacement on Denver’s neighborhoods.
- Denver Human Services (“DHS”) works to meet the citizens it serves where they are by bringing direct services to community. In a recent example, a data-informed approach utilizing the Denver Human Services Index and community feedback was leveraged to launch neighborhood resource sites to bring enrollment and support for services to priority locations, as described below:
  - The Denver Human Services Index aggregates 16 key indicators by neighborhood into one summary map, which can be used by DHS decision makers and community partners to inform programs, practices, services, and investments across the Denver community. These indicators focus on where societal and systemic challenges may be limiting opportunities across the Denver community. At the same time, they showcase historical themes of both resourced and under-resourced neighborhoods throughout Denver.
    - The maps show need, which may be different by place, based on unique characteristics of each neighborhood (for example in the Westwood and Windsor neighborhoods).
  - Locations for Community Conversations and Neighborhood Resource Sites are determined by the health and resource need indicators evaluated in the Index.
  - DHS has opened 3 Neighborhood Resource Sites, with plans to open additional sites in 2022 and 2023, pending evaluation of community data and expressed community need.
A Neighborhood Resource Site will also be a component of the upcoming Assessment, Intake, Diversion (“AID”) Center referenced in other Recommendations Responses.

- The Office of Financial Empowerment and Protection (“OFE”) recently conducted an assessment of COVID disparities and is launching a fines and fees justice program in late 2022 to evaluate fines and fees across the City for equity considerations. More information on these programs will be available publicly in the near future.
  - OFE will also provide financial empowerment services and resources in the upcoming AID Center.
  - OFE works closely with other Denver agencies such as DHS and the Denver Sheriff Department to provide education and resources to support financial health, economic mobility, financial equity and inclusion for Denver residents and small businesses.

- The Denver Department of Public Health and Environment (“DDPHE”) recently completed a behavioral health stigma needs assessment as part of its Anti Stigma Campaign Project. Stigma is known to be a barrier to early intervention and access to treatment and support for behavioral health concerns. The Anti-Stigma Campaign Project aims to engage with Denver community members to better understand stigma associated with substance use, suicide, and mental health conditions to ultimately reduce stigma.
  - DDPHE partnered with a team of organizations with expertise in the aspects needed for success. The lead organization is Analytics and Insights Matter (AIM), for research design, statistical analysis, and project management. AIM is joined by the Arrow Performance Group (APG), which will conduct informative interviews and focus groups, along with Circuit Media, the marketing and media campaign partner. The AIM team worked closely with DDPHE to ensure that Denver’s diverse community voices are heard in the development and implementation of this project. The Phase 1 Report includes results of a comprehensive survey and study regarding barriers to accessing mental and behavioral health supports across the City.
    - Project objectives include:
      - Measuring baselines of knowledge, attitudes, and beliefs that result in stigma associated with behavioral health conditions in Denver;
      - Increasing empathetic responses and decreasing adverse responses to behavioral health conditions in the general population;
      - Reducing stigma as a barrier to accessing services for people with behavioral health conditions and their loved ones.

- In 2022, DDPHE announced new initiatives to address community and behavioral health needs using American Rescue Plan Act funds to address health inequities in Denver. These four programs include:
  1. A Behavioral/Mental Health Needs Assessment and Initial Programming: DDPHE has allocated $1.25 million in ARPA funding to build on prior mental health studies and conduct a comprehensive needs assessment of people needing behavioral/mental health services across the service continuum (prevention, intervention, care and treatment, harm reduction, and recovery).
  2. Youth Mental Health Summit: the 2022 We Got This Youth Mental Health Summit hosted by DDPHE’s suicide prevention team provided the opportunity for more than 300 youth to gain more knowledge about mental health topics and created a space for their voices to be heard.
  3. Mobile Medical, Behavioral and Mental Health Services: to continue the department’s outreach to under-resourced communities, DDPHE will utilize $470,000 in ARPA funding
to support a second mobile medical and behavioral health services vehicle. Known as Denver’s Wellness Winnie, the current mobile unit offers supportive services, behavioral health assistance, and resources to those in need and increases equitable access to services for historically under-resourced communities.

4. Food Resiliency Grants: $1 million in ARPA funds granted through the Denver Food Resiliency Fund will be issued to qualifying organizations that focus on improving infrastructure, operations, and food systems to address the long-term impacts of COVID-19 on the community’s food network. By focusing not just on emergency food, but improving infrastructure, transportation, storage, and communications for food organizations, we will have a more resilient food system in Denver that is prepared to respond to emergencies like COVID-19 in the future.
RECOMMENDATION 36
“Create and adequately support unarmed community-based non-law enforcement response teams to complement LEAD, STAR and Co-Responders.”

KEY AGENCIES – Department of Public Safety; Department of Public Health & Environment

EXECUTIVE BRANCH RESPONSE STATUS – Implementation in progress; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:
• The Support Team Assisted Response (STAR) Program is made up of Emergency Medical Technicians and Behavioral Health Clinicians who respond to certain 911 calls, such as mental health issues, poverty, homelessness, and substance abuse. The pilot program started in June 2020 and was made permanent and expanded in 2021.
• There has been significant investment in expanding the work of STAR in 2021, which will include hiring more responders, funding community services, and buying more vehicles.

Executive Summary
Policies and procedures currently in place or planned:

Background and Current State
• Since 2016, civilian Co-Responders employed by the Mental Health Center of Denver have been responding alongside Denver Police Department officers to provide trauma informed care, de-escalation and resources on high acuity calls for service with a behavioral health nexus. This group makes up the Crisis Intervention Response Unit (CIRU). Over the years, the CIRU has grown from four clinicians in two police districts to thirty-seven clinicians supporting all police districts in the city along with the Denver Fire Department and the Denver Sheriff Department. Four case managers working within the CIRU are also available to provide follow-up and case management for individuals who have been contacted by Co-Responders.
• The Support Team Assisted Response (STAR) Program was piloted in June 2020 and expanded as a permanent community response resource in 2021. When someone calls 9-1-1 for help, the Emergency Call-taking Technician (ECT) screens the information provided to identify the most appropriate resource to dispatch for assistance. When a person calls 911 for certain issues, such as a mental health crisis or a substance use issue, their call may be routed to STAR. The STAR Program is made up of Emergency Response Teams that include Emergency Medical Technicians (EMTs) and Behavioral Health Clinicians who respond to engage individuals experiencing crises related to mental health issues, poverty, homelessness, and substance abuse. Additional information about STAR is available here.

In progress
• To support non-law enforcement response in Denver, there has been a significant investment in expanding the work of STAR. An initial investment of $1.4 million was set aside from the City General Fund to support STAR expansion to a city-wide response in 2020. Denver City Council approved an additional $1.4 million in supplemental funding, followed by a $1.4 million match from the Caring 4 Denver Foundation in 2021. These funds will be used to hire additional clinicians.
and EMTs, fund community services to support individuals served by STAR, and purchase additional vehicles so that STAR can successfully move from the pilot program to an expanded effort across the city.

- In July of 2021, the Caring 4 Denver Foundation provided $420,000 in additional funding to CIRU to allow for program expansion. This funding will provide seven additional clinicians to cover night shift hours in three police districts. These expanded coverage hours will provide supportive services to members of our community who are experiencing behavioral health crises.

- The Department of Public Health & Environment is currently working with contractors Mental Health Center of Denver and Denver Health to ensure that program expansion is efficient and equitable. Several permanent staff positions have been filled and additional STAR units are in the process of implementation. The STAR Community Advisory Committee will continue to evaluate program data to inform expansion and ensure the needs of the community are being met.

- The City is committed to ongoing review of current response resources and learning from best practices in other locations to continuously improve our emergency and non-emergency resources to best support the community.

**Relevant programs led by other partner agencies**

- LEAD (Law Enforcement Assisted Diversion), a state program, and SUN (Substance Use Navigators), a Denver Health program, are two additional initiatives that include civilian response to assist individuals involved in the criminal justice system.
  - LEAD operates with a budget of $551,517, which provides one program administrator, one program manager, and three care managers. The program manager and care managers are employees of the Empowerment Program. Since 2019, LEAD has engaged 104 individuals in pre-book ing diversion and placed 95% of their current cases into housing programs.
  - SUN is funded for the current fiscal year at $350,000, which includes a part-time program administrator and 2.5 staff members from Denver Health (one clinical navigator and 1.5 part-time peer navigators). The remaining portion of the budget is used to provide participants with supportive housing, transportation, and additional supportive services for connection to treatment for substance misuse.
RECOMMENDATION 37
“Decriminalize sex workers who are victims of human trafficking. Deprioritize enforcement against all sex workers and ensure access to necessary services.”

KEY AGENCIES – Denver Police Department; Denver City Attorney’s Office

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent legally feasible

Response Highlight
- The Denver Police Department (“DPD”) created a Human Trafficking Unit in 2019. The Denver District Attorney’s Office (“DA’s Office”) created a Human Trafficking Unit in 2017. They work closely together to help victim-centered and trauma-informed trafficking investigations and prosecutions.
- DPD also has policies and procedures in place specific to victims of human sex trafficking. DPD also refers persons to resources as part of sex trafficking investigations.
- Denver municipal prosecutors divert cases involving charges for prostitution out of the criminal justice system and refer defendants to resources and support.
- Both City Council and the State Legislature have made recent law changes intended to protect victims of human trafficking.

Executive Summary
- The Denver Police Department (“DPD”) created a Human Trafficking Unit in 2019. The Denver District Attorney’s Office (“DA’s Office”) created a Human Trafficking Unit in 2017. They work closely together to facilitate victim-centered and trauma-informed trafficking investigations and prosecutions.
  - The DA’s Office received a federal grant from the U.S. Department of Justice in 2018 to facilitate the Denver Anti-Trafficking Alliance (DATA) human trafficking task force. DPD is an active member of the DATA task force. Per that collaboration, DPD works closely with local nonprofits and community-based victim advocates (including directly with task force grant-partners at the Asian Pacific Development Center) to comprehensively address trafficking victim needs.
- DPD also has policies and procedures in place specific to victims of human sex trafficking, which are described in the Prostitution Offenses Relating to Sex Trafficking and Exploitation policy (OMS 304.11), including:
  - Adoption of the federal definition of sex trafficking as “the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.” (OMS 304.11(1))
  - Recognition “that victims of human sex trafficking are being forced into involuntary servitude and as such are stripped of their basic human rights under the 13th Amendment of the United States Constitution. Therefore, the Denver Police Department is committed to investigating all instances of suspected human sex trafficking in the City and County of Denver.” (OMS 304.11(1)(b))
  - Direction to officers that, “[i]n suspected human trafficking cases, women and juveniles should be treated as victims” (OMS 304.11(2)(c)(2)), and that officers will assess
situational needs related to factors such as protective custody and victim assistance notification, among others (OMS 304.11(3)).

- DPD takes a victim-centered approach to sex trafficking investigations and offers a variety of referrals for services to persons suspected of prostitution, even in investigations in which human trafficking or exploitation are not suspected or readily identifiable. For example, DPD utilizes victim advocates, case managers, and/or social workers to connect and offer appropriate services to victims contacted during illicit massage business investigations and other enforcement operations.

- Denver municipal prosecutors divert cases involving charges for prostitution out of the criminal justice system and refer defendants to resources and assistance. If defendants charged with an offense related to prostitution meet with a case worker, the case is ultimately dismissed. This process does not typically apply to persons charged in relation to unlawful purchasing, who are prosecuted pursuant to existing law.

- Also in 2021, City Council approved Bill 21-0712, which amends the Denver Revised Municipal Code to require massage businesses to become licensed and bans sex acts in massage businesses. The intent of this law is to protect victims of human sex trafficking and create enforcement authority against massage businesses that engage in illegal activity.
  - The DPD and Denver DA led efforts to bring forward this ordinance to protect victims of human trafficking and exploitation occurring within illicit massage businesses.
  - Using a license or regulatory system prioritizes and supports possible victims by providing the groundwork to assist investigators in identifying illicit business operators and preventing practices of exploitation or sex trafficking of persons. This approach is significantly enhanced by combining regulatory processes and law enforcement investigations within a licensing framework.
  - Through the license application process, owners and managers of businesses are identified, submit to criminal background checks, and must attest to individual employees being licensed by the state as professional massage therapists. This, along with business inspections, enforcement of related provisions such as prohibiting sexually explicit advertising, hours of operation, and other provisions discourage practices inherent in illicit massage businesses.

- In 2021, City Council approved Bill 21-0697, which updated the Denver Revised Municipal Code to mirror State statute (C.R.S. 25-4-412) to remove requirements that persons charged with prostitution or other sex-related charges would be required to undergo sexually transmitted infection (STI) testing with certain exceptions.

- HB 22-1288, which was signed into law on May 2, 2022, grants immunity to the charge of prostitution, soliciting for prostitution, or “prostitute making display,” to a person who seeks assistance from a law enforcement officer, the 911 system, or a medical provider for a victim or as a victim of a violent crime or offense, if the evidence for the charge of a prostitution offense was obtained as a result of the person seeking assistance or as a result of the need for assistance.
RECOMMENDATION 38

“Develop, expand and fully fund pre-arrest and pre-booking diversion programs in coordination with law enforcement and community providers, using decentralized, cross-functional teams to coordinate behavioral health assessments and connections to community-based systems of care as well as offering restorative practices and transformative justice options.”

KEY AGENCIES – Department of Public Safety; Denver Police Department; Denver Department of Public Health & Environment

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented; in progress

Response Highlight

- Denver invests in programs for community safety and to reduce justice-involvement. Some examples include:
  - The STAR Program (Support Team Assisted Response);
  - The AID (Assessment, Intake, Diversion) Center
  - The LEAD (Law Enforcement Assisted Diversion) Program
  - The Behavioral Health Solutions Center

Executive Summary

- Denver has invested in and continues to expand and implement programs intended to promote community safety and create better outcomes, including reducing justice-involvement by supporting access to resources to address underlying needs such as housing and health (behavioral, mental, and physical). Some examples include:
  - The STAR Program (Support Team Assisted Response) is an alternative response program intended to minimize unnecessary law enforcement response to appropriate (low risk, low acuity) 9-1-1 calls for service by sending medical and clinician resources to meet a person where they are and assist with addressing the person’s needs, such as behavioral or mental health services and temporary sheltering.
    - Additional information about the STAR Program is available on the Denver Department of Public Health & Environment website, and the Responses to Recommendations 26, 36 and 49.
  - The AID (Assessment, Intake, Diversion) Center, currently in development, will provide an alternative to jail under certain circumstances and connection to comprehensive services in one location from both City and community providers. The AID Center will be a welcoming, trauma-informed center in a central Denver location that will operate 365 days a year and 24 hours a day. Under certain circumstances when individuals are contacted in connection with lower-level offenses, particularly those associated with quality-of-life conditions, officers and clinical personnel will offer to connect these individuals with services for mental and physical health, substance misuse, case management, and shelter, as appropriate. This person-centered approach will focus on the unique aspects of each case to provide services for those in need and reduce justice-involvement.
- Frequently, unhoused community members experience numerous barriers to accessing essential supportive services and the AID Center seeks to provide better access and connection on the basis of assessed need. The AID Center will provide a central, voluntary entry point for assessment and application for housing, food, behavioral and mental health services, and other resources for community members, whether justice-involved or not. One of the planned services to be offered at the AID Center will be the ability to reset court appearances and clear warrants under certain circumstances.

- The LEAD Program (Law Enforcement Assisted Diversion) is a pre-arrest diversion program launched in Denver in 2019.
  - LEAD began in Seattle in 2011 and is a national model for pre-arrest diversion programming.
  - Referrals to LEAD come from:
    1. Divers...
counseling, engagement activities, transportation, and assistance with transitioning to community living;
3. Behavioral and physical health assessment and a subsequent treatment plan, overseen by onsite medical staff;
4. Active coordination of and referral to, as well as transportation and accompaniment to, outpatient mental health and substance misuse treatment;
5. Assistance by on-site social workers to identify and secure housing, jobs, further treatment, and other resources necessary to transition to community living.

- Outside of the Executive Branch, the Denver District Attorney’s Office also offers diversion programs, more information on which can be accessed at the following links:
  - Denver DA Young Adult Diversion Program
  - Juvenile Diversion
RECOMMENDATION 39
“Decriminalize quality-of-life offenses, survival crimes, and other petty infractions such as drug use, and public intoxication.”

KEY AGENCIES – Denver City Attorney’s Office; Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Other

Response Highlight
- These offenses and the way they are treated vary widely based on circumstances. Denver led sentencing reform in 2017, which impacted many of these types of offenses. Denver offers programs like the LEAD (Law Enforcement Assisted Diversion) Program for pre-arrest diversion.

Executive Summary
- These offenses vary widely and the way they are treated depends on the offense, the relevant ordinance, and other factors.
- Denver initiated sentencing reform in 2017, which impacted many of the types of offenses described in this Recommendation. For example, certain offenses, including curfews and closures; storage and loading; solicitation on or near street or highway; urinating or defecating in public; and unauthorized camping on public or private property, known as Class 2 offenses, now have maximum sentences of 60 days and no fines. These offenses are often adjudicated in Outreach Court and often result in service requirements, rather than jail time.
- The majority of criminal drug use is not considered a “petty infraction” under the law. Related to marijuana use, as a part of Mayor Hancock’s mission to promote equity in Denver, Mayor Hancock, the Department of Excise and Licenses, the Denver City Attorney’s Office, and the Denver District Attorney’s Office created the “Turnover a New Leaf” Program to mitigate the negative effects of low-level marijuana convictions obtained before legalization. Through this program, individuals can request to have certain low-level marijuana convictions vacated, dismissed, and sealed.
- The LEAD Program (Law Enforcement Assisted Diversion) is a pre-arrest diversion program launched in Denver in 2019.
- LEAD began in Seattle in 2011 and is a national model for pre-arrest diversion programming.
- Referrals to LEAD come from:
  - Diversion (Officer-initiated after arrest for substance possession, trespassing, shoplifting, or prostitution);
  - Social Contact Referral (Officer-initiated referral when a crime has not been committed, but the contacted person is good candidate for services);
  - Community Referral (A referral from a non-law enforcement member of the community).
- LEAD follows a housing-first strategy and has goals of reducing recidivism and law enforcement contact, while also reducing the harms associated with mental health and substance use disorders, and increasing protective factors for a healthy life.
RECOMMENDATION 40
“Decriminalize traffic offenses often used for pretextual stops.”

KEY AGENCIES – Denver Police Department; Denver City Attorney’s Office

EXECUTIVE BRANCH RESPONSE STATUS – Decline for the reasons described below

Response Highlight
• Denver uses a multi-pronged approach to increase safety and reduce traffic-related injuries and deaths, including education, environmental design, and enforcement.
• Denver Police Department (DPD) policies, procedures, and training are consistent with the law and best practices.
• DPD also has a specific policy in place to address biased policing (Operations Manual 118.00 Biased Policing and Criminal Intelligence Information).

Executive Summary
• Traffic offenses, rather than infractions, are those more serious offenses such as reckless driving and careless driving, which warrant more serious penalties.
• Denver utilizes a multi-pronged approach to increase safety and reduce traffic-related injuries and fatalities, which includes core strategies of Education, Environmental Design, and Enforcement. Detailed information can be found in the Response to Recommendation 43.
• Denver Police Department (“DPD”) policies, procedures, and training are consistent with the laws and requirements that govern searches pursuant to the Fourth Amendment and state law and comply with law enforcement best practices. See the Response to Recommendations 41 and 42 for detailed information regarding DPD policies for searches related to traffic violations and the use of non-police alternatives for traffic safety where feasible.
• DPD also has a specific policy in place to address biased policing (Operations Manual 118.00 Biased Policing and Criminal Intelligence Information). Some of the important aspects of this policy include:
  o The overarching policy statement that: “The City and County of Denver has been, and remains, committed to the protection of civil rights and liberties for all people as expressed in the United States and Colorado Constitutions.” (OMS 118.01)
  o The Purpose statement (OMS 118.02(2)):
    ▪ “(a) To reaffirm the Denver Police Department’s commitment to unbiased policing;
    ▪ (b) To reinforce procedures that serve to maintain public confidence by providing services and enforcing laws in a fair and equitable manner; and
    ▪ (c) To remind officers of ‘probable cause’ and ‘reasonable suspicion’ criteria.”
  o The policy directly states that police-initiated actions such as investigative stops, traffic stops, arrests, and all searches of persons or property (absent consent or a search warrant) “must be based on a standard of reasonable suspicion or probable cause to believe that a crime has been committed or is about to be committed by the person who is the subject of the detention or stop.” (OMS 118.02(3)(c))
  o “Furthermore, officers will not make routine or spontaneous law enforcement decisions (e.g., ordinary traffic stops, pedestrian stops, other stops or detentions, or decisions to
request consent to conduct searches) based upon to any degree a person’s actual or perceived race, color, ethnicity, creed, national origin, language, ancestry, physical or mental disability, age, gender/sex (including pregnancy, childbirth, or caregiver status), sexual orientation, gender expression, gender identity, marital or military status, religion, political affiliation, or any other basis protected by federal, state, or local law or regulation, unless these characteristics, traits, attributes, or statuses are contained in suspect descriptions that have been provided to officers. Profiling or discriminating on the basis of these characteristics, traits, attributes, or statuses is prohibited.” (OMS 118.02(3)(c))

Finally, the Colorado Law Enforcement Integrity Act requires officers to record information related to all contacts made, including traffic stops. Denver and all other Colorado law enforcement agencies must report such information to the Colorado Division of Criminal Justice on an annual basis. The collection of this information will enable Denver and others to review traffic stops and other contacts made by its officers to ensure stops are not being made for pretextual purposes.
RECOMMENDTION 41
“Prohibit Denver Police from conducting searches in relation to petty offenses or traffic violations.”

KEY AGENCIES – Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Decline for the reasons described below

Response Highlight
- Denver Police Department (“DPD”) and Denver Sheriff Department (“DSD”) policies, procedures, and training follow Fourth Amendment standards as well as law enforcement best practices.
- For safety reasons, DPD and DSD decline to completely prohibit searches in relation to petty offenses or traffic violations. The need for legally permissible searches may arise in various circumstances. For example:
  - If a person is arrested, they must be searched before transport and booking into custody for the safety of themselves and others. DPD policies regarding searches of persons are explained in the DPD Operations Manual.
  - If a vehicle is towed to the Vehicle Impound Facility after being stolen or for other reasons, an inventory search must be completed. DPD’s Vehicle Inventory and Processing policy is explained in the DPD Operations Manual.
  - Any person who believes that a DPD or DSD employee may have violated policy may file a complaint through several channels.
  - The Office of the Independent Monitor (OIM) also receives complaints, monitors agency investigations, and issues reports on complaints and discipline.

Executive Summary
- Denver Police Department (“DPD”) and Denver Sheriff Department (“DSD”) policies, procedures, and training are consistent with the laws and requirements that govern searches pursuant to the Fourth Amendment and state law and comply with law enforcement best practices.
- For safety reasons, DPD and DSD decline to completely prohibit searches in relation to petty offenses or traffic violations as the need for legally permissible searches may arise in various circumstances. For example:
  - Searches of arrestees prior to transport and booking into DSD custody must be conducted for the safety of the person being arrested, the officers, bystanders, and personnel at the facilities. DPD policies regarding searches of persons are explained in the DPD Operations Manual.
  - Inventory searches of recovered stolen vehicles or vehicles being impounded for other reasons, must be conducted prior to the vehicle being towed to the Vehicle Impound Facility, to ensure that valuable items are identified, and hazardous items, such as propane tanks, and weapons are removed. DPD’s Vehicle Inventory and Processing policy is explained in the DPD Operations Manual.
• Any person who believes that a DPD or DSD employee may have violated policy may file a complaint through several channels. Depending on the nature of the complaint and potential specifications at issue, the complaint may be investigated through the Internal Affairs Bureau, Safety Administrative Investigations Unit, or via the employee’s chain of command. All complaints are reviewed for potential policy or law violations and sustained violations are addressed in accordance with established disciplinary processes. Information regarding the Public Safety agencies’ disciplinary processes, including the specifications that are applied when a policy violation complaint is made and the considerations and ranges for penalties if the alleged violation is sustained, can be found in the DPD Discipline Matrix and DSD Discipline Matrix. The Department of Public Safety is committed to reviewing complaints and investigations to identify opportunities to modify existing policies, procedures, and training.

• Additionally, the Office of the Independent Monitor (OIM) receives complaints, monitors agency investigations, and issues reports on complaints and discipline.
RECOMMENDATION 42
(Co-reference with response to Recommendation 43)
“Remove police officers from routine traffic stops and crash reporting and explore non-police alternatives that incentivize behavior change to eliminate traffic fatalities.”

KEY AGENCIES – Denver Police Department; Department of Transportation and Infrastructure

EXECUTIVE BRANCH RESPONSE STATUS – Other, as described below

Response Highlight
- Denver cannot completely remove police officers from traffic safety duties.
- Police officers must conduct certain traffic safety investigation and reporting functions, such as Vehicular Homicide and Vehicular Assault investigations.
- DPD has removed officers from traffic safety operations in many ways, as described in the Executive Summary.
- DPD supports the Department of Transportation and Infrastructure’s work on the Vision Zero plan.

Executive Summary
- Legal and community safety and investigation considerations prohibit Denver from completely removing police officers from making routine traffic stops and responding to motor vehicle accidents; however, Denver has made and continues to make substantial steps toward using non-police alternatives where feasible. More information on the Denver Police Department’s (“DPD”) policy on traffic management is explained in the DPD Operations Manual.
- The DPD Traffic Operations Bureau employs 36 civilian Crash Report Technicians who respond to the scene of traffic accidents and conduct on-scene investigation and traffic crash reporting functions.
  - DPD actively monitors staffing and operational needs to identify opportunities to request additional civilian staffing authorization for appropriate functions, including Crash Reporting Technicians, through the City’s annual budget process.
  - Police officers must conduct investigation and accident reporting functions for traffic accidents in cases where felony charges are possible (for example, crashes in which a person suffers serious bodily injury or is driving under the influence of alcohol or marijuana (DUI)). Only sworn officers have the authority and training necessary to complete Vehicular Homicide and Vehicular Assault investigations, which includes submission of chemical testing of breath or blood.
- DPD has invested in automated enforcement technology, specifically red-light cameras and civilian photo enforcement units that perform the enforcement functions for certain red light and speeding violations without the physical presence of a DPD officer.
  - However, under state law, automated enforcement technology may only be used in certain locations and under certain conditions (e.g. photo enforcement can only be used in school zones, construction zones, or along a street bordering a municipal park, among others). The Colorado Legislature has created an Automated Vehicle Identification Systems Issue Brief explaining the use of red-light cameras and photo...
radar technology. DPD has a Photo Radar Enforcement website with information specific to automated enforcement technology use.

- DPD also utilizes electronic speed notification boards and messaging boards reminding drivers to slow down as a mechanism to increase safe practices without the physical presence of a DPD Officer.

- The DPD Traffic Operations Bureau has a Neighborhood Enforcement Team (“NET”) that is responsive to community complaints about traffic safety and provides requested enforcement activities and education.
  - The NET team receives all 3-1-1 traffic complaints and assists and supports each Police District in traffic safety efforts.
  - The NET team employs a precision policing approach to each complaint by meeting with complainants to fully understand the problem, and utilizing fixed stealth radar, if applicable to speeding complaints, to capture data. The data is analyzed to determine if a problem exists, and enforcement action, to include photo enforcement if in an area where legally permitted, may be recommended if needed.
  - Additionally, the NET team may opt to deploy driver feedback signs for a period to remind drivers of the speed limits in the area.
  - This process supports a comprehensive traffic justice model by not sending enforcement to a neighborhood where a complaint is made without supporting data.

- DPD partners closely with the Department of Transportation and Infrastructure (“DOTI”) for education, environmental assessment/design, and compliance strategies, including implementation of the Vision Zero plan.

- See the Response to Recommendation 43 for additional information about the City’s investment in environmental design to increase traffic safety.
RECOMMENDATION 43
(Co-reference with Recommendation 42)
“Eliminate the need for traffic enforcement by auditing and investing in the built environment to promote safe travel behavior.”

KEY AGENCIES – Department of Transportation and Infrastructure; Denver Economic Development & Opportunity; Department of Safety; Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Implementation in progress

Response Highlights
- The Department of Transportation and Infrastructure (“DOTI”) leads the City’s work on increasing safety and reducing traffic-related injuries and fatalities.
- One example is the Denver Vision Zero Action Plan (“Vision Zero”). The Plan includes investing in infrastructure to promote safety.
- As part of the goal to create safe streets, Vision Zero includes strategies to:
  - Encourage safe speeds;
  - Install intersection treatments with proven safety benefits;
  - Install or upgrade pedestrian crossing treatments;
  - Enhance street lighting to improve visibility;
  - Install signal and/or operational modifications that are proven to reduce serious crashes;
  - Build the pedestrian network identified in Denver Moves: Pedestrians & Trails;
- Denver has identified and invested many funding sources to audit and invest in Denver’s built environment to promote safe travel behavior.
- DPD works closely in partnership with DOTI in a comprehensive strategy around traffic safety. Key factors include:
  - Environmental design;
  - Compliance (see the Response to Recommendation 42); and
  - Education
- Both DOTI and DPD work closely with community organizations to educate and promote traffic safety.

Executive Summary
- The Department of Transportation and Infrastructure (“DOTI”) leads the City’s work on increasing safety and reducing traffic-related injuries and fatalities. Denver Vision Zero Action Plan is the five-year plan to set a clear path to achieve zero traffic deaths and serious injuries by 2030, including investing in infrastructure to promote safety. The plan represents significant collaboration among city agencies, state partners, community partners and Denver residents.
- As part of the goal to create safe streets, Vision Zero includes a plan to implement safety treatments along the High Injury Network (“HIN”) and within Communities of Concern (“CoC”), as defined in the Action Plan, including to:
  - Encourage safe speeds through implementation of engineering countermeasures and context-sensitive speed limits;
o Implement geometric intersection treatments with proven safety benefits;

o Install or upgrade pedestrian crossing treatments consistent with the Denver Moves: Trails and Pedestrians plan;

o Enhance street lighting to improve visibility, consistent with the Street Lighting Design Guidelines;

o Implement signal and/or operational modifications that are proven to reduce serious crashes;

o Build the pedestrian network identified in Denver Moves: Pedestrians & Trails;

o Implement Denver Smart City technologies that deliver safe and accessible transportation for people biking, people walking, emergency vehicles, and by connecting people with services to housing.

- Vision Zero also includes plans to:
  o Reconfigure streets and intersections to improve safety and operations, such as continuing building the enhanced bikeway network and the amenities that support it (bicycle detection, parking), and phased implementation to ensure connectivity.
  o Create safe speeds by developing a program with a systematic approach, focusing on speed reduction along the HIN through automated enforcement and messaging, and creating slow zones in priority areas such as school zones, major park zones, and areas with a high concentration of seniors, through engineering and enforcement within the city. These actions will be paired with the initiatives to build safe streets for everyone and promote a culture of safety actions, when possible, so that speed limits are self-enforcing. Promoting a culture of safety includes engagement, education, awareness, and institutional actions.
    - This includes a plan for DOTI, in partnership with DPD and Colorado Department of Transportation, to develop a clear and consistent approach to speed data collection, street design, and automated and manual speed enforcement. By evaluating speed limits citywide, the City and its partners will begin to manage speeds in a more context-sensitive, proactive, and safe way—instead of simply reacting to driver behavior.

- Vision Zero includes a plan to improve data for transparency and accountability, including for DOTI and DPD to work together to establish an official data source for traffic crashes so that all City agencies and partners are consistent in reporting and measuring progress. Having a single source for crash data will enable the City to regularly monitor and communicate Vision Zero progress in a meaningful way.

- Equity is an important Vision Zero guiding principle. Adherence to this principle includes:
  o Instead of increasing in-person traffic enforcement along the HIN or within CoC, focusing on street design changes in these areas, including safe speed limits, mid-block and intersection changes, pedestrian crossings, sidewalks, and enhanced street lighting.
  o Increasing automated speed enforcement along the HIN and along school routes, paired with warning signs so that drivers are not surprised. The goal will be to reduce speeds along these dangerous routes and ultimately have no violations.
  o Instead of increasing fines for traffic violations, piloting a “diversion” program, which will offer positive reinforcement and education to encourage safe behaviors.
  o Working with people in the CoC to have discussions and offer education about traffic safety.
  o Incorporating equity and demographic considerations into police officer training courses.
• More specific detailed information on particular programs can be found in these guiding documents and plans:
  o Safe Routes to Schools Action Plan
  o Denver Moves Bicycles
  o Denver Moves Pedestrian & Trails
  o Denver Moves Transit
  o Complete Streets Guidelines

• Denver has identified and dedicated diverse funding sources to audit and invest in Denver’s built environment to promote safe travel behavior, including operational maintenance, capital, grants, the Elevate Bond, and the RISE Bond.

• As discussed above, DPD works closely in partnership with DOTI in a comprehensive strategy around traffic safety. Key factors include: (1) Environmental design; (2) compliance (through the use of DPD Officers, civilian employees, and automated enforcement tools, as discussed in the Response to Recommendation 42); and (3) education.
  o Both DOTI and DPD work closely with community organizations to educate and promote traffic safety. Examples include:
    ▪ Partnering on annual education/promotional events such as World Day of Remembrance, Ride and Walk of Silence, and Bike to Work Day.
    ▪ Continuing to share National Highway Traffic Safety Administration and Colorado Department of Transportation’s safety messages through social media and variable message boards.
RECOMMENDATION 44

“End the school to prison pipeline by eliminating all school-based public safety contracts, diverting budget savings to social and emotional learning, behavioral monitoring and reinforcement, counseling, and peaceable schools programs.”

KEY AGENCIES – Department of Public Safety; Public Safety Youth Programs

EXECUTIVE BRANCH RESPONSE STATUS – Implemented in part; will implement further as outlined below

Response Highlight

- The provisions of the Department of Safety and Denver Public Schools contract related to School Resource Officers in Denver Public Schools have lapsed.
- The Department of Public Safety Youth Programs Division has a contract with DPS Prevention Services to expand access to behavioral health supports in DPS.
- Youth Programs works with DPS on programs to reduce youth involvement in the criminal justice system.

Executive Summary

- A contract between the Department of Safety and Denver Public Schools related to school-based public safety exists, but the provisions relating to School Resource Officers (“SROs”) in Denver Public Schools (“DPS”) have not been renewed.
- In the past, the Denver Police Department (“DPD”) and DPS split the costs of placing SROs in schools. The lapse of SRO contract provisions did not provide any budget savings to Denver and/or DPD because the officers previously assigned to that post have been reassigned to other duties. How DPS chooses to utilize any savings from this contract is at the sole discretion of DPS.
- The Department of Public Safety, through the Youth Programs Division, has an existing contract with DPS Prevention Services to expand access to behavioral health supports on DPS campuses through a Caring For Denver grant. This grant runs through the 2022-2023 school year and provides many of the same services identified in this Recommendation.
  - For example, the grant places prevention specialists in participating schools to help address behavioral health concerns through targeted prevention strategies. The grant provides funding to support a trauma-informed and restorative practices unit that school staff can participate in to develop skills to recognize and respond to trauma and create a trauma-informed and responsive culture.
- Additionally, Youth Programs has modified its Diversion model to offer schools and DPS safety personnel the opportunity to refer students to the Youth Programs Diversion program without issuing a citation.
- Youth Programs is currently working with DPS to fully implement a pre-citation diversion program (“Alternative to Citation” or “ATC”) after a successful pilot in 2019 that showed a significantly decreased citation rate. While the pilot was halted during the COVID pandemic, the initial results were positive with citations being reduced by nearly 50% collectively between the participating schools. Even though the program is voluntary, the completion rate during the initial pilot phase was 75%.
The ATC program is voluntary and is focused on identifying risk and protective factors that are impacting youth behavior and connecting youth and family to support services located in their community. Youth Programs has staff co-located in specific DPS schools who are utilizing the ATC program instead of referring youth to the juvenile justice system.
RECOMMENDATION 45
“Create regular amnesty events to clear warrants for failures to appear or unpaid fines, and expungement clinics for eligible offenses.”

KEY AGENCIES – Denver City Attorney’s Office; Denver Department of Public Safety

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented; in progress

Response Highlight
• Denver offers events and programs to clear warrants and assist with court proceedings. Examples include: Denver Outreach Court; Veterans Court; “Turnover a New Leaf” Clinics.

Executive Summary
• Denver Outreach Court, part of the City and County of Denver Courts, is designed to increase stabilization and reduce future interactions with the justice system for individuals experiencing homelessness. Involved individuals are also offered available services and shelter. The court helps individuals resolve municipal and low-level citations or warrants and provides direct access to mental health services and enrollment in Medicaid. Community service options are also available to complete court requirements. Instead of requiring people to come to a courthouse, which for those experiencing homelessness can often be difficult, the Outreach Court is held every other Wednesday at the Central Public Library and/or Denver Rescue Mission to meet people where they are. Anyone can come in on any date, and they will be added onto that day’s docket. The goal is to provide better access to the court system, in an effort to avoid further involvement with the criminal justice system. Connect on social media here.

• There is a Veterans Court in Denver, which is a type of problem-solving court designed to serve justice-involved military and former-military members with mental health and substance use needs, where appropriate, through intensive supervision and treatment to increase the likelihood for successful community reintegration. There is also a Veterans Court Mentor Program.

• “Turnover a New Leaf” Clinics: As a part of Mayor Hancock’s mission to promote equity in Denver, Mayor Hancock, the Department of Excise and Licenses, the Denver City Attorney’s Office, and the Denver District Attorney’s Office created the “Turn Over a New Leaf” program to mitigate the negative effects of low-level marijuana convictions obtained before legalization. Through this program, individuals can request to have certain low-level marijuana convictions vacated, dismissed, and sealed.
  o Note: Colorado statutory structure prevents automatic dismissal and sealing of the matter; the involved person must file a motion seeking such relief.
RECOMMENDATION 46
“Automatically expunge past convictions for actions that are no longer illegal and automatically seal records for certain misdemeanors and low-level felonies.”

KEY AGENCIES – Denver City Attorney’s Office

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented; in progress

Response Highlight
- If a case brought under the Denver Revised Municipal Code is dismissed, it is sealed in court the same day.
- "Turnover a New Leaf" Clinics facilitate requests for low-level marijuana convictions to be vacated, dismissed, and sealed.
- When a youth completes the Denver Safety Youth Programs Municipal Diversion Program, the case is automatically expunged within forty-two (42) days.

Executive Summary
- The crimes within the City of Denver’s purview are municipal crimes and traffic offenses, including domestic violence, assault, shoplifting, trespassing, and traffic violations, among others. As such, many misdemeanors and felonies are not within Denver’s jurisdiction, but instead lie with the Denver District Attorney’s Office and Denver District Court.
- If a case brought under the Denver Revised Municipal Code is dismissed, it is sealed in court the same day.
  - Note: Colorado statutory structure prevents automatic dismissal and sealing of the case; the involved person must file a motion seeking such relief.
- "Turnover a New Leaf" Clinics: As a part of Mayor Hancock’s mission to promote equity in Denver, Mayor Hancock, the Department of Excise and Licenses, the Denver City Attorney’s Office, and the Denver District Attorney’s Office created the “Turn Over a New Leaf” program to mitigate the negative effects of low-level marijuana convictions obtained before legalization. Through this program, individuals can request to have certain low-level marijuana convictions vacated, dismissed, and sealed.
- When a youth successfully completes the Denver Safety Youth Programs Municipal Diversion Program, the case is automatically expunged within forty-two (42) days of completion by the Courts.
- Several recently passed state laws relate to expungement of past convictions, including:
  - Pursuant to HB17-1204, signed into law in May 2017, juvenile courts automatically expunge certain juvenile cases upon the completion of the sentence or program. In some situations, the juvenile must still petition for expungement. Prior to the passage of this legislation, Denver Safety Youth Programs assisted families in completing and filing the necessary paperwork to expunge municipal cases.
  - HB19-1275, signed in May 2019, revised and expanded eligibility for criminal records sealing. Under this law, individuals may petition the relevant court to seal particular misdemeanor and felony conviction records if certain requirements are met, as detailed in the statute.
Pursuant to HB20-1424, signed into law in June 2020, the Governor may grant pardons to a class of defendants who were convicted of possession of up to two ounces of marijuana. Under this authority, the Governor has signed an executive order issuing a pardon on convictions for possession of 1 oz. or less of marijuana.

SB 22-99, passed in 2022, expands the process for automatically sealing records to eligible non-violent offenses, including civil infractions, as detailed in the statute.
RECOMMENDATION 47
“Use data to prevent gentrification-driven displacement and reduce criminal enforcement against displaced people through cross-agency collaboration.”

KEY AGENCIES – Department of Housing Stability; Denver Economic Development & Opportunity; Human Rights and Community Partnerships; Department of Public Safety; Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Implementation in progress, as outlined below

Response Highlight
- In 2016, the Office of Economic Development (“OED”) conducted a study on gentrification and involuntary displacement. Denver agencies continue to use this information to inform their work.
- The Neighborhood Equity and Stabilization (“NEST”) Division within Denver Economic Development and Opportunity (“DEDO”) is developing a data-driven index to identify an updated set of priority neighborhoods for its work.
- Community Planning and Development (“CPD”) includes an annually-updated map of neighborhoods vulnerable to involuntary displacement in the City’s land use and transportation plan, Blueprint Denver.
- CPD, NEST, and the Department of Housing Stability (“HOST”), also produced an online, interactive mapping tool that anyone in Denver can use.
- CPD and DEDO also created an online Neighborhood Dashboard with socioeconomic data for Denver’s 78 neighborhoods.
- HOST is working to address involuntary displacement through data analysis and policy advancement.

Executive Summary
- In 2016, the Office of Economic Development (“OED”) conducted a study on gentrification and involuntary displacement identifying where gentrification was taking place at that time and identifying strategies from peer cities to mitigate involuntary displacement. Denver agencies continue to monitor involuntary displacement data and work to improve data in order to inform city strategy and investments. More information on the study and strategies is available on the OED website.
- The Neighborhood Equity and Stabilization (“NEST”) Division within Denver Economic Development and Opportunity (“DEDO”) was created in 2019 to work to preserve the culture and character of neighborhoods experiencing significant change by helping provide longtime businesses and residents opportunities to remain in place. The NEST team is currently working on developing a data-driven index to identify an updated set of priority neighborhoods for this work.
- Community Planning and Development (“CPD”) used the same methodology from the 2016 gentrification and involuntary displacement study to incorporate a map of neighborhoods vulnerable to involuntary displacement into the City’s land use and transportation plan, Blueprint Denver. More information on strategies to reduce vulnerability to displacement can be found on the CPD website. CPD provides an annually updated map that shows which neighborhoods are vulnerable to involuntary displacement.
CPD, together with the Department of Housing Stability (“HOST”) and NEST, also produced an online, interactive mapping tool that anyone in Denver can use to better understand the patterns of displacement, including property tax increases, demolition permits, and demographic changes.

CPD and DEDO also created an online Neighborhood Dashboard with socioeconomic data for all of Denver’s 78 neighborhoods. Some of the data is specifically related to understanding vulnerability to displacement in that neighborhood.

HOST is also working to address involuntary displacement. Through the department’s housing stability work, HOST is working to help create a Denver where residents have the choice of when and under what circumstances they move or remain in their homes and neighborhoods. In its Five-Year Strategic Plan, HOST has established three goals to advance housing stability – helping households remain in their home and neighborhood of choice, reducing evictions, and reducing foreclosures – and is in the processes of baselining targets to measure progress. This includes working to build a partnership with Denver Public Schools (“DPS”) to help measure involuntary displacement of families with children. HOST will be working with CPD and NEST to begin exploring an analysis project to track mobility citywide through DPS data. Additionally, HOST will be advancing a prioritization policy that, if passed, would allow residents who have experienced or are at risk of involuntary displacement priority access to newly developed and preserved affordable housing.

The Denver Sheriff Department collects and reports comprehensive data related to the population of individuals in custody in Denver jails, including demographics and housing information (see also Response to Recommendation 20). In 2022, DSD plans to continue its equity-focused research using these data, to include studies evaluating various operational processes. See also the Responses to Recommendations 13 and 14, available at the Response to “Transforming Public Safety” Recommendations Dashboard.
RECOMMENDATION 48

“Create an ordinance making it illegal to contact law enforcement solely to discriminate against a person for any illegitimate purpose, including a person’s race, ethnicity, disability, religious affiliation, gender, sexual orientation or gender identity.”

KEY AGENCIES – N/A

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented

Response Highlight
- It is already illegal to contact law enforcement for these reasons under state false reporting laws (C.R.S. § 18-8-110; C.R.S. § 18-8-111) and municipal false reporting ordinances (D.R.M.C. Chp. 38, Sec. 40).
- Denver Police Department also has unbiased policing policies in place.

Executive Summary
- It is already illegal to contact law enforcement for the reasons identified in this Recommendation pursuant to state false reporting laws (C.R.S. § 18-8-110; C.R.S. § 18-8-111) and municipal false reporting ordinances (D.R.M.C. Chp. 38, Sec. 40).
- To the extent a false report is made to the Denver Police Department (“DPD”), the person making such false report would be investigated and charged to the full extent of the law.
- DPD also has unbiased policing policies in place and continues to provide training to its officers related to equity, diversity and inclusiveness, including mandatory anti-bias training. The policy of the Denver Police Department is to respect every person’s right to be free from discrimination or harassment because of actual or perceived race, color, creed, national origin, ancestry, sexual orientation, physical or mental disability, age, gender/sex (including pregnancy, childbirth, or caregiver status), marital or military status, religion, political affiliation, or any other basis protected by federal, state, or local law or regulation.
RECOMMENDATION 49

“Enable and increase ambulatory contracts with Denver Fire and Denver Health to improve response times and allow dispatch of ambulances to STAR calls without police.”

KEY AGENCIES – Denver 9-1-1 Communications; Denver Fire Department; Department of Public Safety; Department of Public Health & Environment

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented as outlined below

Response Highlight

Policies and procedures currently in place:

- Denver 9-1-1 Communications Center staff assign appropriate response resources when calls are received. Denver Fire Department (DFD) provides basic life support medical response. Denver Health paramedics provide advanced life support and ambulance transport services.
- The Support Team Assisted Response (STAR) Program is made up of Emergency Medical Technicians and Behavioral Health Clinicians who respond to certain 911 calls, such as mental health issues, poverty, homelessness, and substance abuse. The pilot program started in June 2020 and was made permanent and expanded in 2021. Since the rollout of the STAR Program, Denver Health ambulances have been responding to STAR calls for services without police.
- The STAR Community Advisory Committee reviews and assesses STAR call data to ensure resources are being used appropriately.

Executive Summary

Policies and procedures currently in place:

- As part of Denver’s two-tiered emergency medical response system, 9-1-1 calls are assessed by the Denver 9-1-1 Communications Center staff and appropriate response resources assigned. The Denver Fire Department (DFD) provides Basic Life Support (BLS) medical response. The Denver Health and Hospital Authority (DHHA) is contracted by the City to provide Advanced Life Support (ALS) and ambulance transport services through its Paramedic Division.
- The Support Team Assisted Response (STAR) Program was piloted in June 2020 and expanded as a permanent community response resource in 2021. When a person calls 911 for certain issues, such as a mental health crisis, their call may be routed to STAR depending upon the circumstances. The STAR Program is made up of Emergency Response Teams that include Emergency Medical Technicians (EMTs) and Behavioral Health Clinicians who respond to engage individuals experiencing crises related to mental health issues, poverty, homelessness, and substance abuse.
- The STAR Program is staffed by a City Program Manager at Denver 9-1-1 and contracted EMTs and Clinicians who are dispatched to respond to calls for service. Since the rollout of the STAR Pilot Program in June of 2020, Denver Health ambulances have been responding to STAR calls for services without police. This process prevents the unnecessary use of resources and provides a more trauma-informed experience for the person being served. This also allows the STAR team to request the additional resources they need and avoid a “one size fits all” response. Additional information about STAR is available [here](#).
• Key stakeholders will continue to review and assess STAR call data to ensure that additional resources are being dispatched appropriately through the STAR Community Advisory Committee.
RECOMMENDATION 50
(Co-reference with Rec. 12)
“Create an app to access alternatives for behavioral health crises.”

KEY AGENCIES – Department of Public Safety; Denver Human Services; Department of Public Health and Environment

EXECUTIVE BRANCH RESPONSE STATUS – Will implement as outlined below

Response Highlight
Implementation plan:
- The Department of Public Safety created an online mapping app that helps the public find resources to use or share with others.
- The app can identify resources by service type, location, and hours of service.
- Several providers offer services after-hours and on weekends.
- Resources will be updated to be as comprehensive and accurate as possible as the app’s capabilities expand.
- The app is available to both desktop and mobile users.
- Links to resources that are alternatives to calling 911 will be provided.

Executive Summary
Implementation Plan:
- The Department of Public Safety has developed an interactive, web-based mapping application that can assist both members of the public and businesses working with persons needing resources within a walkable or accessible distance from their location. Also included are links to existing tools that are alternatives to contacting 911 for assistance, such as the Support Team Assisted Response (STAR) Program direct access number, and information for other agencies with which Denver partners, including Colorado Crisis Services (text/chat, telephone, and walk-in services), the Mental Health Center of Denver (telehealth application, email, and walk-in services), and others.
- The application is available for desktop or mobile users. Many of the services included have after-hours and weekend availability to expand access when other services are not available.
- Many services have been added to the application, but it will be continuously updated with more resources and to ensure existing resources are active, accurate, and accessible.
- The Department will also develop community partnerships to create sustainable processes for maintaining the tool and listed resources, adding additional resources, ensuring accessibility and proper advertisement of the tool and contents, and emphasizing expansion of community-based and -managed resources, including Colorado Crisis Services, 2-1-1 Colorado, Remerg and others.
RECOMMENDATION 51
“Measure the proficiency of all law enforcement personnel (including relevant civilian personnel) as well as 911 dispatchers in the Denver Metro Area to ensure that Crisis Intervention Team training is effective.”

KEY AGENCIES – Department of Public Safety

EXECUTIVE BRANCH RESPONSE STATUS – Will Implement/implementation in progress, as outlined below

Response Highlight
- The Department of Public Safety (“DOS”) supports Crisis Intervention Team training (“CIT”) as an important tool for public safety personnel to best respond to and support the Denver community.
- The DOS agrees to explore options for and design a study of Denver’s CIT training and programming.

Executive Summary
- The Department of Public Safety (“DOS”) supports Crisis Intervention Team training (“CIT”) as an important tool for public safety personnel to best respond to and support the Denver community. The Denver Police Department was an early adopter of the CIT training model, and the Denver Sheriff Department was the creator of the jail-specific modifications to standardized CIT training that are now trained across the nation.
  - CIT is one component of the holistic model used by DPD to support ongoing evaluation and decision-making regarding the appropriate tactics, resources, and partners needed for a particular situation. For additional information, see the Responses to Recommendations 52 and 92.
- The DOS agrees to explore options for and design a study of Denver’s CIT training and programming. The DOS will also explore the possibility of a metro-wide or broader scope for the study to ensure alignment with other agencies at the local and national level.
- The Executive Branch has supported and invested in the DOS agencies, including Denver 911, to incorporate CIT into training and operations, as well as other tools serving similar objectives, including:
  - The Co-Responder Program (see Response to Recommendation 26 for additional details);
  - The Support Team Assisted Response (STAR) Program (see Responses to Recommendations 26, 36, 49 for additional details);
  - The Crisis Response Unit (see Response to Recommendation 71 for additional details);
  - The Solutions Center and AID Center, described in detail in multiple Recommendations Responses.
- Assessment of the effectiveness of these important functions is ongoing and continuous. The Executive Branch will continue implementing and expanding training, alternative response teams, and resource-based infrastructure in a data-driven and evidenced based approach to provide integrated and coordinated responses to meet the needs of the Denver community.
RECOMMENDATION 52
(Co-reference with Responses to Recommendations 75 & 97)
“Invest in a community-based, community-led violence prevention strategic plan that includes but is not limited to traffic stop violence and government sanctioned violence.”

KEY AGENCIES – Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; implementation in progress in part, as described below

Response Highlight
• An independent assessment will be performed on the feasibility, need, and potential scope of a Denver Office of Community Engagement and/or an Office of Neighborhood Safety.
• Information about Denver Police Department (DPD) and Denver Sheriff Department (DSD) investments in training, policies, and programs to maintain community safety while minimizing negative outcomes can be found in Response to Recommendation 36; Response to Recommendation 41; Response to Recommendation 42; Response to Recommendation 43; Response to Recommendation 92; Response to Recommendation 93; Response to Recommendation 98. Many of these included community collaboration.
• Both DPD and DSD utilize Crisis Intervention Team (“CIT”) and Active Bystandership for Law Enforcement (“ABLE”) methodologies.

Executive Summary
• Detailed information about the Denver Police and Sheriff Department strategic investments in training, policies, and programs intended to maintain community safety while minimizing negative outcomes for individual community members, employees, and the Denver community as a whole, have been provided in response to multiple recommendations. Many of these initiatives included community collaboration. For example:
  o Response to Recommendation 36 regarding Denver’s investment in diversion and integrated response options to decrease unnecessary law enforcement contact and criminal justice involvement;
  o Response to Recommendation 41 regarding the role of Denver Police Department (“DPD”) officers in traffic safety;
  o Response to Recommendation 42 regarding the multi-faceted approach used to maintain traffic safety, including DPD Officers, civilian units, and automated enforcement tools;
  o Response to Recommendation 43 regarding built environment alternatives to traffic safety enforcement;
  o Response to Recommendation 92 regarding Sanctity of Life statements established in both DPD and DSD policy;
  o Response to Recommendation 93 regarding the duty of DPD officers and Denver Sheriff (“DSD”) deputies to intervene, as well as the implementation of the Active Bystandership in Law Enforcement (“ABLE”) Program in both agencies;
  o Response to Recommendation 98 regarding policies and procedures related to crowd management in both DPD and DSD written directives.
- Related to DPD’s efforts to eliminate the use of inappropriate force, DPD utilizes a comprehensive decision-making, skills, and tactics model for assessing scene safety and making contact with individuals that includes de-escalation techniques and strategies. The DPD Decision Making Model is the tool officers use to decide which tactics, resources, and partners should be utilized in a particular situation.
- In addition, DPD is currently implementing the Integrating Communications, Assessment, and Tactics ("ICAT") model developed by the Police Executive Research Foundation ("PERF") as a component of required and ongoing training related to use of force and de-escalation.
  - ICAT focuses on the decision-making model that is the essential first step when an officer is evaluating a situation and identifying the options available to diffuse and de-escalate without using physical force.
  - ICAT emphasizes officer decision-making and tactics in situations where an individual may be in mental health crisis and/or is potentially armed with something other than a firearm.
- Also, DSD has established a Crisis Response Team ("CRT") staffed by trained behavioral health specialists. CRT staff are on call and will respond to any incident that occurs inside Denver’s correctional facilities when there is risk for a use of force by DSD staff. CRT staff will utilize behavioral health training and crisis response tools in order to gain an individual’s compliance and understanding of jail rules and instructions without the use of force when possible.
- Both DPD and DSD utilize Crisis Intervention Team ("CIT") and Active Bystandership for Law Enforcement ("ABLE") methodologies, as described in other responses.
- The Mayor’s Office, in coordination with City Council leadership, has directed that an assessment be performed by an independent third party to evaluate the feasibility of, need for, and potential scope of a Denver Office of Community Engagement and/or an Office of Neighborhood Safety. The independent third party will collect data, perform an analysis, and make related recommendations.
RECOMMENDATION 53
(Co-reference with Recommendations 105 & 106)
“Remove electronic surveillance absent an active investigation, and prohibit future investments in electronic surveillance in overpoliced communities.”

KEY AGENCIES – Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Decline in part, as discussed below

Response Highlight
- Denver Police Department uses HALO cameras in community safety efforts to deter and investigate crime.
- DPD commits to completing an annual data review plan of HALO cameras.
- DPD’s HALO camera policies can be found in the DPD Operations Manual Section 119.01.
- DPD uses data to ensure proper deployment of HALO cameras. The data includes crime and calls for service, volume of pedestrian and vehicle movement, volume of special events, potential for homeland security targets, and other considerations.
- Placement of Mobile HALO cameras must be approved by the Strategic Investigations Bureau Commander. These cameras may be in place no longer than 14 days unless there is a warrant or consent.

Executive Summary
- The Denver Police Department (DPD) uses High Activity Location Observation (HALO) cameras and Rapid Deployment Cameras (RDCs) in community safety efforts for both crime deterrence and investigatory functions.
- The placement of overt cameras in public areas is to enhance the safety and security of the community and to reduce the fear of crime. DPD currently operates 259 HALO cameras (an online map of camera locations can be found [here](https://www.denverpolice.org)) (updated April 2022)). HALO cameras do not utilize facial recognition technology or any artificial intelligence and do not have audio capability.
- DPD retains video from HALO cameras for 30 days unless it is attached to a criminal investigation or civil matter. The retention of HALO camera footage is governed by policy. DPD’s retention policies are reviewed and vetted by the Chief Data Protection Officer for the City, including the policy for retention of HALO videos, which was reviewed during a risk impact assessment initiative at the end of 2019.
- Justification for removal or additional camera placement is/will be accomplished through a comprehensive assessment of the totality of circumstances that support the use of this limited resource. Circumstances to be considered will include crime and calls for service data. DPD will also consider volume of pedestrian and vehicle movement, volume of special events, potential for homeland security targets, and any other considerations brought forth by the affected District Commander, developed in part through conversations with City leadership and community.
- DPD’s Real Time Crime & Information Center operates the HALO system. The HALO team is composed of 11 civilians: 1 supervisor and 10 technicians that work 10-hour shifts to provide in-person staff coverage and monitor high priority calls daily from 7:00am – 3:00am, 365 days
per year. HALO staff must pass a background check and drug screening prior to employment. They are also required to sign a confidentiality declaration upon employment, ensuring they will maintain confidentiality regarding or related to the information they are tasked with monitoring. The confidentiality agreement is required to be signed annually.

- HALO camera technicians communicate directly with 911 dispatchers to support various aspects of the emergency response, including:
  - Monitoring a scene prior to the arrival of first responders. In some instances, this monitoring may result in the need for additional resources, which the HALO technician can communicate to the 911 dispatcher;
  - Communicating with DPD and dispatchers when other first responders have arrived on scene (e.g., EMS);
  - Helping keep situations from further escalation by providing responding officers with real time actionable information;
  - Supporting the navigation of traffic congestion to assist the safe travel and arrival of first responders;
  - Assisting in getting first responders to the correct calls and providing additional resources as needed;
  - Allowing for a quicker response to an emergency or incident that a victim is experiencing;
  - Monitoring may also be utilized to either corroborate or exonerate allegations of criminal activity.

- A Rapidly Deployable Camera (“RDC” or “Mobile HALO Camera”) may be used for the same purpose as a fixed HALO camera (as identified above), to monitor areas with identified safety and security risks, or when related to active investigations. Placement of Mobile HALO cameras must be approved by the Strategic Investigations Bureau Commander and such cameras may be in place no longer than 14 days unless a warrant is obtained. Mobile HALO Cameras monitoring a residence may be actively monitored for more than 14 days if the resident consents by signing a Consent to Search form (DPD Operations Manual Section 119.01(13)).

- Detailed policies about the use of fixed and mobile HALO cameras can be found in DPD Operations Manual Section 119.01.

- DPD recently provided presentations to the City Council Finance & Governance Committee with information about the HALO program, which can be accessed here:
  - Video of February 1, 2022 presentation
  - Video of April 26, 2022 presentation
RECOMMENDATION 54
“Enforce the ban on police preventing civilians from videorecording police activity.”

KEY AGENCIES – Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented as outlined below

Response Highlight
Current policies and procedures:
- Denver Police Department and Denver Sheriff Department policies recognize that the public has a state law right to record officers performing their duties in public places. There are reasonable limits to this right.
- If a person is interfering with an officer’s job duties or is a safety risk, the officer or officers must communicate with the person and ask them to move to another reasonable location.
- Any person who believes that a DPD or DSD employee may have violated policy may file a complaint through several channels.
- Additionally, the Office of the Independent Monitor (OIM) receives complaints, monitors agency investigations, and issues reports on complaints and discipline.

Executive Summary
Current policies and procedures:
- Denver Police Department and Denver Sheriff Department policies and procedures recognize that, under Colorado law, members of the public, including but not limited to media representatives, are permitted to record officers performing their official duties in public places. This right is subject to reasonable restrictions, including that a person does not have a right to interfere with an officer in the lawful performance of his or her duties or to jeopardize the safety of officers or others.
- If a person recording officers performing their official duties in public places is interfering with an officer’s ability to perform those duties or poses a safety risk to officers or others, DPD and DSD policies and procedures require that this should be clearly communicated to the person and the person should be asked to move to another reasonable location before any further enforcement action is taken. It is the responsibility of officers managing an incident or contact to maintain situational safety for all involved persons and bystanders. Measures to maintain safety and the integrity of a crime scene may include, but are not limited to, designating a media staging area, designating locations from which filming may safely take place, and/or restricting access to certain areas through tape or other means to designate boundaries.
- All employees are required to become familiar with new or updated policies and are notified when policies are added or changed. Policies and procedures are also reinforced through training.
- Any person who believes that a DPD or DSD employee may have violated policy regarding a member of the public’s rights related to filming officers may file a complaint through several channels, and depending on the nature of the complaint and potential specifications at issue, the complaint may be investigated through the Internal Affairs Bureau, Safety Administrative Investigations Unit, or via the employee’s chain of command. All complaints are reviewed for potential policy or law violations and sustained violations are addressed in accordance with...
established **disciplinary processes**. Information regarding the Public Safety agencies’ disciplinary processes, including the specifications that are applied when a policy violation complaint is made and the considerations and ranges for penalties if the alleged violation is sustained, can be found in the **DPD Discipline Matrix** and **DSD Discipline Matrix**. The Department of Public Safety is committed to reviewing complaints and investigations for opportunities to update policies, procedures, and training.

- Additionally, the Office of the Independent Monitor (OIM) **receives complaints**, **monitors agency investigations**, and issues **reports** on complaints and discipline.
RECOMMENDATION 55

“Bar the Denver Police Department from entering into blanket contracts with entities to obtain access to surveillance footage and instead require an individualized request to the person who owns the surveillance device.”

KEY AGENCIES – Department of Public Safety; Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Decline, as explained below

Response Highlight

- Neither DPD nor DSD participates in programs or arrangements with third-party surveillance or monitoring companies to receive automatic or blanket access to camera footage related to homeowners or businesses.
- There are important safety reasons why DPD or other law enforcement partners might need immediate, situational access to surveillance footage. DPD personnel do not actively watch surveillance footage maintained by other entities.
- In most circumstances, DPD personnel must ask permission from the owner or the courts to access surveillance material.
- Residents or business owners who want to submit security footage they own for criminal investigation purposes are able to do so.

Executive Summary

- Neither DPD nor DSD participates in programs or arrangements with third-party surveillance or monitoring companies that contract with individual homeowners or businesses to receive automatic or blanket access to camera footage related to their products. However, there may be cases when community safety necessitates incident-specific immediate access to surveillance technology and techniques.
- Safety is enhanced when the DPD or other law enforcement partners have immediate, situational access to surveillance footage such as maintaining a suspect location in the immediate aftermath of a violent crime, or a large-scale critical incident such as a mass shooting. DPD personnel do not actively monitor surveillance footage maintained by other entities.
- In most circumstances, DPD personnel are required to request and obtain surveillance footage directly from the owner of the technology or seek a warrant through the judicial system to demonstrate that the relevant legal threshold is met regarding the need to access the surveillance material.
- If private entities or individuals such as residents or business owners want to submit security footage they own for criminal investigation purposes, they are able to electronically submit it to the police department.
- The Denver Sheriff Department (“DSD”) does not engage in investigations that would utilize surveillance technology as described in this Recommendation.
RECOMMENDATION 56
“Prohibit the use of facial recognition technology by Denver law enforcement.”

KEY AGENCIES – Department of Public Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented, as described below

Response Highlight
- Neither the Denver Police Department nor Denver Sheriff Department has a facial recognition technology program.
- High Activity Location Observation (“HALO”) cameras do not have facial recognition technology.
- In the future, if the Department of Public Safety or its agencies identify a particular facial recognition technology that might benefit community safety, the Department commits to inviting community input.

Executive Summary
- Neither the Denver Police Department nor Denver Sheriff Department has a facial recognition technology program.
- High Activity Location Observation (“HALO”) cameras do not have facial recognition technology.
- In the future, if the Department of Public Safety or its agencies identify a particular facial recognition technology that might benefit community safety, the Department commits to inviting community input into the development of policy regarding the use of such technology, which will include methods of community outreach and education.
RECOMMENDATION 57
“Require body-worn cameras to automatically activate at a time that captures law enforcement interactions in their entirety.”

KEY AGENCIES – Department of Public Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Decline (Operationally Prohibitive)

Response Highlight
• The Denver Police Department (“DPD”) and Denver Sheriff Department (“DSD”) body-worn camera (“BWC”) policies follow the requirements of the Law Enforcement Integrity Act. The DPD BWC policy and DSD BWC policy are available on the agency websites.
• The current BWC technology used by DPD and DSD has a thirty-second “buffer” capability, which means the camera is constantly recording video (but not audio). This video is overwritten unless the recording button is activated. When the BWC is activated, the previous thirty seconds of video is retained along with the audio and video from the moment of activation forward.
• DPD provided community education and demonstration sessions at the rollout of BWC technology and sought community input on the design of their BWC technology policies.

Executive Summary
• The Denver Police Department (“DPD”) and Denver Sheriff Department (“DSD”) policies on body-worn camera (“BWC”) activation follow the requirements of the Law Enforcement Integrity Act, C.R.S. § 24-31-902. The DPD BWC policy and DSD BWC policy are available on the agency websites.
• The current BWC technology used by DPD and DSD has a thirty-second “buffer” capability, which means the camera is constantly recording video (but not audio). This video is overwritten unless the recording button is activated (i.e., the BWC is manually turned on). When the BWC is activated, the previous thirty seconds of video is retained along with the audio and video from the moment of activation forward.
• DPD provided community education and demonstration sessions at the rollout of BWC technology. Both DPD and DSD conducted extensive legal research and sought community input on the design of their BWC technology policies to balance bystander and participant privacy and transparency when conducting law enforcement actions.
RECOMMENDATION 58
“Permit safe injection sites in the City and County of Denver.”

KEY AGENCIES – N/A

EXECUTIVE BRANCH RESPONSE STATUS – Other, as described below

Response Highlight
- Because state action must first be taken before a safe use site could legally operate in the City, Denver is unable to take any further action at this time.
- Denver is now distributing free fentanyl test strips and the opiate overdose reversal drug Naloxone to residents who ask.
- The Denver Sheriff Department recently launched a pilot called the “Harm Reduction Release Bag” Program.

Executive Summary
- In 2018, Denver City Council adopted an ordinance by a 12-1 vote approving a pilot program to allow a safe use injection site to operate for two years within City limits. The site is not permitted to use public funds. The ordinance contained a clause that the ordinance would not take effect until the Colorado General Assembly adopts legislation permitting safe use injection sites.
- Because state action must first be taken before a safe use site could legally operate in the City, Denver is unable to take any further action at this time. We note that additional federal law challenges may also prohibit the implementation of the operation of such a site in Denver.
- Denver is now distributing free fentanyl test strips and the opiate overdose reversal drug Naloxone to residents who ask. To obtain the reversal drug, which can counter reduced breathing after an overdose, residents must watch a short video on how to administer it.
- The Denver Sheriff Department recently launched a pilot called the “Harm Reduction Release Bag” Program to persons releasing into community to increase access to Naloxone, fentanyl testing strips, and information regarding Medication-Assisted Treatment (MAT) resources.
RECOMMENDATION 59
“End cash bail for all defendants accused of serious crimes unless it is proven by clear and convincing evidence that the defendant is a flight risk or violent threat to the community. Maintain pretrial jail population at lower levels attained during the pandemic.”

KEY AGENCIES – Department of Public Safety; Community Corrections Division; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Decline for the reasons outlined below

Response Highlight
- The Colorado Constitution establishes a right to bail with certain exceptions, as listed in Section 19 of the Bill of Rights. Modifications to the legal right to bail are outside the jurisdiction of the Executive Branch.
- State law governs rights related to bail. See C.R.S. § 16-4-101 et. seq.
- The pre-trial release process is defined by joint judicial order.
- The Executive Branch has partnered with stakeholders to launch a study to understand the impacts of bond reform policies and practices on community safety and personal outcomes.

Executive Summary
- The Colorado Constitution establishes a right to bail with certain exceptions, as listed in Section 19 of the Bill of Rights. There are limited circumstances under which courts may issue a “no bond allowed” status for a person accused of committing serious crimes or who presents a significant community safety risk. Modifications to the legal right to bail are outside the jurisdiction of the Executive Branch.
- State law governs rights related to bail. See C.R.S. § 16-4-101 et. seq. Several pieces of state legislation have been passed in the last few years expanding these rights. For example:
  - SB 19-191 (expanding defendants’ rights related to pretrial bond)
  - HB 21-1280 (related to pre-trial detention reform, including requiring a bond setting hearing within 48-hours after an arrestee's arrival at a correctional facility)
  - HB 17-1338 (requiring a timely hearing for a defendant in jail with a municipal court hold)
  - HB 19-1225 (prohibiting the use of monetary bail for particular levels of offenses except in certain circumstances). The Denver Revised Municipal Code was amended in 2020 (Ordinance 20-1179) to reflect this legislation at the municipal level.
- The pre-trial release process is collaboratively defined by joint judicial order. Denver uses an actuarial risk-based assessment tool to identify persons at high- and low-risk of successfully completing the pre-trial period in community and/or under conditions, including supervision. Denver is in the process of evaluating a revised assessment tool that has been designed to decrease the impact of systemic and historical inequities in the criminal justice system.
- The COVID-19 pandemic required unprecedented actions in a short period of time to protect the health and welfare of offenders, staff, and community in Denver Sheriff Department facilities. Denver implemented multiple emergency measures during the height of the pandemic with the goal of reducing in-custody populations within Denver’s facilities as a public health and safety measure. These measures included: the temporary suspension of arrests for certain non-violent...
offenses and the increased use of in-home detention as opposed to sentences, including in-custody work release.

- The Executive Branch has partnered with stakeholders across the Denver criminal justice system to launch a comprehensive study to better understand the impacts of bond reform policies and practices on community safety and personal outcomes.
RECOMMENDATION 60
“Improve return-to-court support services and eliminate jail for those who voluntarily make the effort to clear a warrant.”

KEY AGENCIES – Department of Public Safety; Community Corrections; Denver City Attorney’s Office

EXECUTIVE BRANCH RESPONSE STATUS – Previously Implemented in part / in progress to the extent feasible and allowable under the law

Response Highlight
- There are specialty and problem-solving courts in Denver, including: Denver Outreach Court; Veterans Court; and Turnover a New Leaf Clinics.
- One of the planned services to be offered at the Assessment Intake Diversion (“AID”) Center is to reset court appearances and clear warrants under certain circumstances.

Executive Summary
- There are specialty and problem-solving courts and events that currently exist in Denver, many of which include the ability to clear warrants in certain circumstances, including: Denver Outreach Court; Veterans Court; and Turnover a New Leaf Clinics.
  - Outside of the Executive Branch, the Denver District Attorney’s Office also has a resource list of other problem-solving courts available in Denver.
- The responses to other Recommendations may be referenced with respect to more specific services, including Recommendation 61 (text reminders and virtual court appearances); Recommendation 62 (use of “B-Smart” incentives and sanctions model in residential halfway houses to reduce technical violations); Recommendation 68 (integration of peer navigators and case managers into pre-trial and post-sentencing phases of the criminal justice system process).
- One of the planned services to be offered at the upcoming Assessment Intake Diversion (“AID”) Center will be the ability to reset court appearances and clear warrants under certain circumstances.
RECOMMENDATION 61
“Use text messages to notify individuals of deadlines for court and make court appearances possible via free virtual platform.”

KEY AGENCIES – Department of Public Safety, Community Corrections Division

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented; in progress to the extent feasible and allowed by law

Response Highlight
- The Department of Public Safety’s Community Corrections Pretrial Services Division has been providing court reminder text messages to clients since 2015.
- State law requires Colorado courts to issue text-message reminders to criminal and juvenile defendants for upcoming court dates.
- Virtual court appearances are determined by individual courts and judges, not Denver’s Executive Branch.

Executive Summary
- The Department of Public Safety’s Community Corrections Pretrial Services Division has been providing court reminder text messages to clients since 2015.
- Pursuant to SB19-036 (2019) and SB22-018 (2022), the Court Reminder Program requires Colorado courts at all levels (district, county, municipal) to issue text-message reminders to criminal and juvenile defendants for upcoming court dates. SB22-018 allows defendants to opt-out of three reminders before their court date (including the day before), rather than opt-in, as previously required.
- The allowance and regulation of virtual court appearances are determined at the discretion of individual courts and judges, and therefore, outside the jurisdiction of Denver’s Executive Branch to determine.
RECOMMENDATION 62
“Reduce supervision and probation check-ins for nonviolent crimes and eliminate technical violations and bench warrants that result in more jail or prison time.”

KEY AGENCIES – Department of Public Safety

EXECUTIVE BRANCH RESPONSE SUMMARY – Previously implemented in part; decline to implement in part, as described below

Response Highlight
- There are different types of community-based supervision. The conditions and terms of supervision will be different based on the type of case and other circumstances.
- The Court makes decisions about supervision, not the Denver Executive branch. The Denver Executive Branch does not have jurisdiction over probation check-ins.
- Technical violations are violations of the Court-imposed conditions regarding community supervision. Issuance of a bench warrant for such technical violations are at the sole discretion of a judge. The Court must be notified when a person is not compliant with the conditions of their supervision. The Court determines next steps, including possible sanctions (such as a bench warrant).
- The Courts set policy about the conditions of community-based supervision.
- For Denver County residential halfway houses, the “B-Smart” incentives and a sanctions model assist and encourage participants to reduce technical violations.

Executive Summary
- There are different types of community-based supervision relevant to different stages of the criminal justice process. Many cases involving non-violent crimes and/or technical violations do not result in court-ordered supervision involving required check-ins, electronic monitoring, and/or intensive case management. For violations under the Denver Revised Municipal Code, probation is supervised in a limited category of cases by Denver County Court, including cases involving violence, domestic violence, and when required by state statute. In other cases, probation is unsupervised.
  - Department of Public Safety, Community Corrections Division provides vital, cost-effective programs that serve as an alternative to prison for individuals vetted and approved to participate in certain types of cases. All of these programs, for offenders placed in residential facilities or in non-residential treatment and supervision programs, protect the community by monitoring offenders and their activities and work to ensure criminal patterns are not repeated. For more information on levels of supervision, please visit Pre-trial Services.
- The Denver Executive branch does not have jurisdiction over a court’s final determination regarding required supervision, nor does it have jurisdiction over probation check-ins. These matters are within the purview of the courts and probation departments.
  - Pre-trial Services (within the Denver Community Corrections Division) may assess defendants in Denver’s custody prior to their first court appearance. This program obtains essential information and makes risk-informed recommendations to the court to assist in determining appropriate pretrial release conditions.
• Technical violations are violations of the Court-imposed conditions regarding community supervision, and issuance of a bench warrant for such technical violations are at the sole discretion of a judge. When a person is non-compliant with the conditions of their community-based supervision, Community Corrections programs must notify the Court to allow the judge to evaluate the circumstances surrounding the person’s non-compliance and next steps, including possible sanctions (such as a bench warrant) to ensure public safety and accountability.

• A joint administrative order of the Denver District and County courts describes the pretrial release and detention guidelines that direct pretrial decision-making, including processes to limit supervision for low-level crimes involving low risk participants/defendants. Supervision may be decreased over time if there is demonstrated compliance with the requirements of the court order and the program.

• For Denver County residential halfway houses, the “B-Smart” incentives and a sanctions model are utilized to assist and encourage participants to reduce technical violations.
RECOMMENDATION 63
“Create a community-led committee, comprised of those with lived experiences and individuals from most impacted communities, along with the Public Defender’s office to review all municipal criminal ordinances to determine which ordinances are antiquated, ambiguous, and unnecessary to public safety, in order to minimize citizens’ interaction with law enforcement and the criminal courts.”

KEY AGENCIES – Crime Prevention and Control Commission; City Attorney’s Office

EXECUTIVE BRANCH RESPONSE STATUS – Will implement as outlined below

Response Highlight
Policies and procedures currently in place or planned:
- The Crime Prevention and Control Commission (CPCC) is forming a committee to review criminal ordinances on an annual basis.
- The City Attorney’s Office (CAO) reviews the municipal criminal code when necessary. The Executive Summary includes several examples of this review. The CAO invites the Municipal Public Defender and other stakeholders (when relevant) to take part in code review when it occurs.
- Other Executive Branch agencies also review code provisions within their subject matter expertise when needed.

Executive Summary
Policies and procedures currently in place or planned:
- The Crime Prevention and Control Commission (CPCC) is forming a committee to review criminal ordinances on an annual basis; additional information on this initiative will be provided as it is developed.
- The Prosecution and Code Enforcement Section of the City Attorney’s Office (CAO) reviews the municipal criminal code on an as needed basis. For example, about four years ago, the CAO examined sentencing under the criminal code and recommended changes. Similarly, the CAO has examined criminal nuisance abatement and recommended changes. Most recently, the CAO examined criminal wage theft and recommended revisions based on changes at the state level and to address antiquated language around the elements of the charge. When that type of code review occurs, the CAO reaches out to appropriate stakeholders, including executive leadership of the Municipal Public Defender.
- Other Executive Branch agencies also review relevant code provisions within their subject matter expertise and suggest changes as needed.
RECOMMENDATION 64
“Create outreach campaigns in collaboration with the communities most impacted by incarceration to prevent trauma, affirm gender identity and queerness and promote social support networks for LGBQ+/TGI persons who are incarcerated or re-entering society.”

KEY AGENCIES – Department of Public Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously Implemented, as outlined below

Response Highlight
- Both the Denver Police Department (“DPD”) and the Denver Sheriff Department (“DSD”) have had liaison positions to the LGBTQ+ community in place since 2017 (DPD) and 2019 (DSD).
- The DPD and DSD LGBTQ+ Community Liaisons:
  - Are ex-officio members of the Human Rights and Community Partnerships (“HRCP”) LGBTQ Commission;
  - Work closely with community leaders, residents, and businesses to provide outreach and support to the LGBTQ+ Community;
  - Conduct outreach activities involving the LGBTQ+ community and LGBTQ+ specific internal training;
  - Design and implement public safety projects and programs to establish a closer, more effective dialogue between the LGBTQ+ community and the agencies;
- The Liaisons can be reached at the following email addresses:
  - DPD: michelle.folmer@denvergov.org or michael.wyatt@denvergov.org
  - DSD: dsdlgbtqliaison@denvergov.org

Executive Summary
- Both the Denver Police Department (“DPD”) and the Denver Sheriff Department (“DSD”) have recognized the need to create identified liaison positions to the LGBTQ+ community and have had these liaisons in place since 2017 (DPD) and 2019 (DSD).
- In 2018, DPD expanded to two LBGTQ+ liaisons to support the Denver community. The role of the liaisons for DPD include:
  - Outreach activities involving the LGBTQ+ community & LGBTQ+ specific internal training, including to all new DPD officers;
  - The DPD LGBTQ+ Community Liaisons are Ex-officio members of the Human Rights and Community Partnerships (“HRCP”) LGBTQ Commission;
  - The Liaisons work closely with The Center and One Colorado to provide outreach to the LGBTQ+ Community, including being involved in youth activities, and other programs;
  - The Liaisons and DPD have sponsored a booth at PrideFest to recruit officers from the LGBTQ+ community for many years.
- Examples of specific projects on which the DPD liaisons have partnered with the LGBTQ+ community include:
  - The Liaisons have worked closely with The Center to create First Responder training;
DPD created a training bulletin and policy in 2016 titled, “Interaction with Transgender Individuals.” The policy and training gave specific guidance and requirements for officers to appropriately interact with people who are transgender.

In partnership with the Denver community, DPD created the Safe Location Program where local businesses post stickers to identify themselves as a safe place for members of the LGBTQ+ community to reach out or wait for police response if they encounter harassment, violence, or other negative behaviors.

- DSD currently has one appointed LBGTQ+ liaison to support the Denver community. The role of the liaison for DSD includes:
  - Serving as a personal, single point of contact between DSD and the LGBTQ+ community;
  - Assisting, advising, and consulting with DSD leadership and staff on LGBTQ+ issues;
  - Providing and/or coordinating training for members of DSD on LGBTQ+ topics;
  - Attending events and trainings in the LGBTQ+ community as a DSD representative;
  - Collaborating with community leaders, residents, and businesses to design and implement public safety projects and programs to establish a closer, more effective dialogue between the LGBTQ+ community and DSD;
  - Serving as an ex officio member of the City and County of Denver HRCP LBGTQ Commission.

- Examples of specific projects on which the DSD liaison has or will partner with the LGBTQ+ community include:
  - Direct outreach sessions will be made with LGTBQ+ community groups to ensure that our community is aware of the liaison program, services provided to members of the community and their families, and to provide education on DSD’s nationally recognized best practices in regard to treatment of LGBTQ+ community members in Denver’s detention facilities. This includes policies on staff training, search preferences, preferred pronouns, transgender support, and re-entry services.
  - In collaboration with community partners, DSD will develop a resource list for members of the LGBTQ+ community to be made available to inmates and their families. The list will include both internal resources and re-entry resources and services, including responsive services in medical, legal, housing, mental health, employment, and victim services categories.
  - The DSD LGBTQ+ Community Liaison program is one of a few, if not the only, detention-based program of this nature. This distinction allows DSD to provide support beyond Denver to other agencies developing programs to serve the LGBTQ+ community.

- The Liaisons are available to specifically address issues that affect the LGBTQ+ community in an open-minded, equitable, and impartial way, with a goal of developing good working partnerships with members of this diverse community. The Liaisons can be reached at the following email addresses:
  - DPD: michelle.folmer@denvergov.org or michael.wyatt@denvergov.org
  - DSD: dsdlgbtqliaison@denvergov.org
RECOMMENDATION 65
“Remove barriers to reentry that bar formerly incarcerated individuals from obtaining professional certifications, government employment opportunities, public housing, financial aid, and public benefits.”

KEY AGENCIES – Department of Public Safety; Denver Sheriff Department; Human Rights and Community Partnerships; Denver Economic Development and Opportunity; Denver Human Services

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; in progress to the extent feasible and allowed by law, as described below

Response Highlight
- Executive Branch agencies working with justice-involved community members recognize barriers they may face and assist through certain City programs. Examples are included in the Executive Summary.
- Denver’s Ban the Box policy can be found in Executive Order 135.
- Certain positions, such as peace officers, are not legally allowed to be held by persons with certain records.

Executive Summary
- Executive Branch agencies working with justice-involved community members recognize the barriers these community members may face and assist with working through some of these barriers through certain programs. For example:
  - The Law Enforcement Assisted Diversion (“LEAD”) Program works with partner agencies to develop policies and identify solutions regarding access to housing and other basic needs such as transportation, food, and behavioral health services.
  - The Office of Community Violence Solutions led the Department of Safety in efforts to formalize hiring practices related to the Openness to Candidates with Lived Experience policy to allow waiver of background check barriers for appropriate positions.
  - The Denver Sheriff Department (“DSD”) is launching a program in partnership with the Sheraton hotel to post available jobs within DSD facilities and to provide support to persons in custody to complete job applications and interviews with the goal of having a job waiting for them upon release.
  - The Human Rights and Community Partnerships Office of Financial Empowerment & Protection (“OFE”) provides jail-based training, including removal of fraud and identity theft issues from credit reports. OFE also partners with local credit unions to create access to bank accounts and credit building tools.
    - OFE is launching a fines and fees justice program in Summer 2022 to evaluate fines and fees across the City for equity considerations.
    - OFE staff will also participate in the Alternative Intake Diversion (“AID”) Center, as well as Denver Human Services Community Resource Center pods.
  - Denver Economic Development and Opportunity (“DEDO”) manages a digital accessibility program in partnership with Denver Public Libraries to increase access to laptops and internet hotspots, as well as career growth and jobseeker resources.
o Regarding public housing, the Denver Housing Authority ("DHA") implements the public housing program. DHA is an entity outside of the City and sets standards for admission into and removal from its housing units. Some of these standards are mandated federally by the Department of Housing and Urban Development ("HUD"), and all public housing authority entities must abide by such standards. DHA has an appeals process for persons denied or removed from DHA housing units. See also the Response to Recommendation 16.

- Denver Human Services offers additional assistance to incarcerated individuals, including:
  o Direct benefit assistance such as Medicaid, SNAP, financial, family reunification, and other general services (e.g., rental assistance and motel vouchers for families identified as experiencing homelessness);
  o Resource engagement and case management to identify further needs such as assistance with substance misuse and mental health needs (direct referrals may be made to Mental Health Center of Denver and Complex Care assistance through DHS).

- Governor Polis signed House Bill 22-1259 on June 3, 2022, which removes the ban previously in place for eligibility for the Colorado Works (Temporary Assistance for Needy Families (TANF) program for a person convicted of a drug-related felony offense unless the person was determined by a county department of human or social services to have taken action toward rehabilitation.

- Denver instituted a Ban the Box policy (which prohibits employers from asking about a person’s criminal history on a job application) via updates to Executive Order 135 in 2016. Executive Order 135 provides the City’s criminal background check policies when a person is hired or has a change in position. The State also enacted a Ban the Box policy for employers via the Colorado Chance to Compete Act (C.R.S. § 8-2-130) (this does not include government agencies).

- There are certain positions, such as peace officer positions, that persons with certain records are prohibited from holding by law. Additional information is available from the Colorado Peace Officer Standards & Training (POST) Board.

- Additional relevant information can be found in the Responses to Recommendations 45, 46, 67, and 68.
RECOMMENDATION 66
“Create a funded reentry department by ordinance or executive order for community-based, culturally and
gender responsive, trauma-informed and survivor initiated transformative justice practices involving both
adult and youth justice-involved populations for all crimes.”

KEY AGENCIES – Department of Public Safety; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; implementation in
progress in part

Response Highlight
• A combination of City agencies, funded partnerships and resources provide community reentry
services. Reentry services include referrals to community-based programs and organizations.
• DSD staff members offer classes and reentry services in the jails that align with the Transition
from Jail to the Community model (TJC). The Second Chance Center helps persons continue
accessing services in the community.
• The full Executive Summary has more information about partners and examples of reentry
services work.
• Denver is committed to ongoing program and process evaluation. DSD incorporates cultural
responsiveness and sensitivity principles throughout trainings, programs, and service offerings.

Executive Summary
• Denver has worked to build a multi-faceted, community-partnered holistic model to assist those
reentering the community after justice-involvement resulting in custody. Assessments, supports,
and resource connections may take place various stages of justice-involvement, including pre-
arrest, in custody, and in community. Reentry services are a combination of work by City
agencies, funded partnerships and resources, along with referrals to community-based
programs and organizations, as described in more detail below.
• Various agencies within the City and County of Denver work collaboratively to assist those
reentering the community, including: the Denver Department of Public Safety, the Denver
Sheriff Department (DSD), the Community Corrections Division, Youth Programs, the Crime
Prevention & Control Commission (CPCC), the Denver County Court, the Denver District
Attorney Office, and the Office of the Municipal Public Defender. Examples of this work include:
  o DSD has staff members that work specifically to assist with reentry, offering classes and
    reentry services that align with the Transition from Jail to the Community model (TJC).
    DSD assesses persons in its facilities, begins to work with them on addressing their
    individual needs while in custody, and then transitions them to the Second Chance Center
    to continue accessing services in the community. Examples of reentry programs and
    services offered to those in custody and re-entering community include: emergency and
    transitional housing; education and employment; behavioral health (including mental
    health supports and Medication-Assisted Treatment, among others); financial
    educational empowerment; and life skills.
  o The CPCC, which is made up of members representing both government and community,
    provides funds that are designed to assist people entering and exiting the justice system
    who are in need of behavioral health services. The commission has been dedicated to
developing and implementing a variety of programs to decrease the use of the jail and reduce recidivism since its inception. In 2018, Denver City Council expanded the role of the Commission to include a behavioral health element – specifically identifying the extent to which addressing behavioral health needs may affect those who become involved in the justice system before, during, and after systems involvement. Additionally, the Commission is charged with fostering innovation and alternatives in the criminal justice system and to provide initial funding opportunities for projects that advance these ideals.

- The Denver Juvenile Services Center is a central location and multi-agency coordination point for supportive service screenings, referrals, and intervention processes and services as appropriate for juveniles and families both resulting from law enforcement contact or involvement in the juvenile justice system, or as a proactive resource for community members seeking supports. A comprehensive inventory of systems-led preventative and responsive programming oriented to reduce involvement in the juvenile justice system as well as reduce exposure to violence for youth and families was created through the Youth Violence Prevention Action Table’s 2020 Program Inventory.

- Denver also invests in programs and initiatives to break the cycle of jailing and justice system involvement through permanent supportive housing. Examples include the Social Impact Bond initiative and the Social Impact Partnership to Pay for Results Act grant, which are managed by the Department of Housing Stability (“HOST”) and discussed in the Response to Recommendation 14. See also the Response to Recommendation 74.

- Denver County Court (DCC) offers various services to support reentry, including: outreach and navigation supports through specialty court dockets for people experiencing homelessness and/or people in need of mental health or substance use services; access to navigators that can assist people with a Driving Under Restraint charge to become compliant with the Department of Motor Vehicles by addressing the underlying reason their license was revoked; programming for persons with multiple DUls to assist with treatment of underlying conditions as part of the county court probation process.

- Core management and community partners in reentry services include: Second Chance Center, Empowerment Program, Mile High Behavioral Healthcare, Wellpower (formerly Mental Health Center of Denver), Tribe Recovery, Don’t Look Back Center, Servicios de la Raza, Denver Health & Hospital Authority, and the Caring For Denver Foundation, among others.

- Governmental partners outside of the City and County of Denver include: the Colorado Behavioral Health Administration, Denver District Court, and the Colorado State Public Defender’s Office, among others.

- Additional information about the Executive Branch and community partners supporting persons in custody can be found in the Response to Recommendation 12.

- Additional examples of Executive Branch and community partnerships to support the Denver community can be found at the Response to Recommendation 19 and Response to Recommendation 65.

- Denver is committed to ongoing program and process evaluation to ensure equity in access to programs and services as well as outcomes for programming participants. DSD incorporates cultural responsiveness and sensitivity principles throughout trainings, programs, and service offerings. DSD recognizes the need to continue to engage and improve accessibility and cultural responsiveness in support of justice-involved persons.

- The Executive Branch recognizes that reentry work is best coordinated by representation from both community and the various agencies in the Denver criminal justice system and therefore will
utilize the CPCC to assess current strengths, challenges, and opportunities related to reentry services, including alignment with best practices and logistics such as department structure, and recommendations related to such.
RECOMMENDATION 67
“Provide post-conviction free legal and financial assistance to mitigate collateral consequences (e.g. licensing restrictions, record sealing, criminal system debt) and obtain orders of relief and fee waivers to enhance employment opportunities, increase compliance with court requirements and reduce judicial order variation.”

KEY AGENCIES – Human Rights and Community Partnerships (Office of Financial Empowerment and Protection and the Office of Immigrant and Refugee Affairs); Denver Human Services

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent feasible; in progress, as outlined below

Response Highlight
• There are multiple programs by Denver agencies to help with the consequences of involvement in the criminal justice system, including: “Turn Over a New Leaf” program; the Immigrant and Refugee Legal Services Fund; resources to assist with Landlord/Tenant and housing legal issues; Office of the Municipal Public Defender assistance for eligible parties, among others.

Executive Summary
• There are multiple specific programs provided by Denver agencies to assist with mitigating the consequences of involvement in the criminal justice system, including the following examples:
  o In April 2021, Mayor Hancock signed Council Bills 21-0216 and 21-0217 into law, creating a comprehensive social equity program for marijuana licensing in Denver.
  o As part of the mission to promote equity in Denver, Mayor Hancock, the Department of Excise and Licenses, the Denver City Attorney’s Office, and the Denver District Attorney’s Office created the “Turn Over a New Leaf” program to mitigate the negative effects of low-level marijuana convictions obtained before legalization. Through this program, individuals can request to have certain low-level marijuana convictions vacated, dismissed, and sealed.
  o Cases involving the violation of Denver’s ordinances are sealed without cost to the involved persons.
  o The Immigrant and Refugee Legal Services Fund provides free legal services to the populations it serves.
  o The Office of Financial Empowerment and Protection provides education, counseling, and resources related to financial navigation, consumer financial protection, free tax services and access to Financial Empowerment Centers and credit rebuilding resources.
  o Denver Human Services (DHS) does not provide legal advice but can make referrals to legal service agencies like Colorado Legal Services.
    ▪ DHS provides fee waivers for Identification and Birth Certificates.
  o Safety Youth Programs works with youth offenders in the juvenile justice system to assist with expungement of records and other legal issues.
- Denver has put together resources to assist with Landlord/Tenant and housing legal issues, including eviction and foreclosure; for example, the Denver tenants’ rights and resources list. Denver provides funding for free legal services for low and moderate-income individuals facing an eviction. Information on free legal services can be obtained from:
  - Colorado Legal Services (primary provider): 303-837-1313 or coloradolegalservices.org;
  - Colorado Affordable Legal Services: 303-996-0010 or coloradoaffordablelegal.com;
  - Colorado Poverty Law Project: 720-772-9762 or copovertylawproject.org;
- The Office of the Municipal Public Defender provides legal representation to defendants who face jail time for violating municipal ordinances in the Denver County Court System with an online eligibility application.
- See also the Response to Recommendation 65 regarding the work of multiple Executive Branch agencies to mitigate barriers for persons exiting custody, including assistance in obtaining housing, employment, and financial navigation.
- It is also important to note that Denver invests in services and supports for justice-involved persons prior to the resolution of their criminal charges. Examples include:
  - The Office of the Municipal Public Defender includes the Front Door to Procedural Justice program that seeks to connect clients with resources and improve criminal justice outcomes. Additional information is available in the presentation materials discussed with the City Council Safety, Housing, Education & Homelessness Committee on February 16, 2022. The OMPD has also conducted a research study regarding needs and outlining goals for client supports.
  - See the Response to Recommendation 68 regarding the work of multiple Executive Branch agencies to incorporate peer supports and supportive resources for justice-involved persons.
  - See the Response to Recommendation 74 regarding prioritization of permanent supportive housing and other work by multiple Executive Branch agencies to support persons preparing to transition from custody back into community, which includes case management, behavioral health supports, and other resources.
RECOMMENDATION 68
“Connect justice-involved persons with county-funded formerly justice involved community-based advocates that are reflective of the diversity of the reentering population to navigate the judicial system including diversion opportunities.”

KEY AGENCIES – Department of Safety; Community Corrections Division; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; in progress, as outlined below

Response Highlight
- Several Denver programs serve to connect justice-involved persons with formerly justice involved advocates, including: Veterans Court Mentor Program; Denver Sheriff Department partnership with the Second Chance Center in the City to provide services to individuals releasing from Denver jails; various peer navigator programs, as described in the full Executive Summary.

Executive Summary
- **Veterans Court Mentor Program**: The Colorado Veterans Treatment Court Mentor Programs provide overall support, advocacy, and mentorship for military veterans involved in the criminal justice system to increase their chances of successful rehabilitation and community reintegration by pairing trained mentors with participants to help with their transition out of the criminal justice system.
- The Denver Sheriff Department partners with the Second Chance Center in the City (SCCIC) to provide services to individuals releasing from Denver jails. The SCCIC staff includes formerly justice involved individuals working to support transitioning persons.
- In 2020, Denver City Council adopted a resolution approving and providing for the execution of a Grant Agreement between the City and County of Denver and the Caring for Denver Foundation concerning the "Forensic Peer Navigators" program and the funding to expand services to the Denver County Court Problem Solving Courts by adding Forensic Peer Navigators to better support individuals involved in the Denver County Court system.
- In 2021, the Department of Public Safety’s Community Corrections Pretrial Services Division partnered with Tribe Recovery Homes and SCCIC for a grant through the Caring For Denver Foundation. The grant funds peer navigators through these community partners who assist individuals ordered by the courts into pretrial supervision while awaiting disposition of their criminal charges.
- Project Elevate, working with the Empowerment Program, is integrating peer care managers with lived experiences into the residential community corrections halfway house programming. This program is launching in Summer 2022.
- Denver incorporates peer navigation and support resources into several outreach and engagement programs, including the Denver Public Library Peer Navigator Program, Department of Housing Stability Early Intervention Team, and the Community & Behavioral Health Division of the Department of Public Health and Environment. Though these programs are not specific to navigation of the justice system, the peer resources and community members may have lived experiences, including current or former justice involvement.
RECOMMENDATION 69
(Co-reference with Recommendations 70 & 71)
“Guarantee non-coercive, equal access to all treatment resources for justice-involved individuals, both in or out of custody regardless of ability to pay. Streamline points of entry within courts, jails and prisons for mental health and substance use disorder services.”

KEY AGENCIES – Denver Sheriff Department; Department of Public Health and Environment

EXECUTIVE BRANCH RESPONSE STATUS – Other/in progress to the extent feasible

Response Highlight
- See the Response to Recommendation 71 for more about mental and behavioral health services for persons in custody in Denver Sheriff Department (“DSD”) facilities.
- In 2022, DSD launched the Harm Reduction Release Bag program for individuals being released to the community.
- The Department of Public Health and Environment (“DDPHE”) manages community-based programs and access points to mental and behavioral health resources. Examples are included in the Executive Summary.
- Denver is committed to health equity in its delivery of services.

Executive Summary
- See the Response to Recommendation 71 for information regarding mental and behavioral health stabilization and support services for persons in custody in Denver Sheriff Department (“DSD”) facilities. Additionally, DSD works with community partners to create a network of sober living bed options to support persons releasing from custody.
- In 2022, DSD launched the Harm Reduction Release Bag program for individuals being released to the community from the Downtown Detention Center (DDC) and the Denver County Jail (COJL). The bags include one dose of Narcan, five Fentanyl test strips, inpatient and outpatient Medication Assisted Treatment (MAT) resources in the Denver area, and a contact number for Narcan replacement. Training videos will be played in all housing units and intake at both facilities to inform individuals in custody of the program and how to use both the Narcan and Fentanyl test strips. DSD is also expanding its Medication-Assisted Treatment (“MAT”) services to inmates at its Facilities.
- The Department of Public Health and Environment (“DPHE”) manages many community-based programs and access points to mental and behavioral health resources, including:
  - Denver Strong, a program educating and empowering the Denver community around behavioral health issues, including free trainings and consultation services. A community resource guide is available here.
  - The Behavioral Health Solutions Center, a facility offering crisis stabilization, temporary housing, and ongoing assistance for mental and behavioral health issues.
  - The DDPHE Community and Behavioral Health division is home to the Substance Misuse Program, which aims to prevent substance misuse, improve treatment access and retention, and reduce harm associated with drug use, including resources for people who use substances.
Denver’s Wellness Winnie is an RV with scheduled travel routes through Denver for the purpose of providing integrated behavioral health and support services. Wellness Winnie exists to empower all people in Denver to live their healthiest life and to increase equitable access to resources, helping the community to thrive. Wellness Winnie is staffed with mental health counselors and peer navigators. Through shared experiences, peer navigators are skilled to support recovery and mental well-being. The following services are currently provided:

- Peer support and navigation;
- Informal classes and presentations;
- Sharps disposal;
- Behavioral health screening and assessment;
- Active referral to services such as: medical, legal, and social services
- Distribution of items such as: socks, gloves, toiletries, etc.;
- Rehydration and cooling from the heat;
- Warming from the cold;
- Narcan distribution and overdose education.

- Denver is committed to health equity as a principle in its delivery of services.
RECOMMENDATION 70
(Co-reference Response to Recommendation 30)
“Create a centralized secure mental health facility for assessments, treatment, and management by psychiatric staff of mentally ill people within 24 hours after incarceration.”

KEY AGENCIES – Department of Public Safety; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Other/in progress to the extent feasible

Response Highlight
- There are physical facilities in Denver to stabilize and support behavioral and mental health needs. Examples include the Behavioral Health Solutions Center and the forthcoming Assessment, Intake, Diversion (“AID”) Center.
- The Department of Public Safety invests in resources to support community members in crisis through the 911 system. Clinician and peer navigation resources are also available during pre-trial or post-sentencing supervision periods.

Executive Summary
- Co-reference with the Response to Recommendation 30 regarding work currently underway to restructure behavioral and mental health systems in a statewide, coordinated manner, including opioid abatement strategic planning and funding.
- See also the Response to Recommendation 71 regarding the programs in place to support persons in-custody and releasing from custody to stabilize, plan, and transition to community-based services and supports.
- The City has invested and continues to invest in physical facilities to stabilize and support behavioral and mental health needs and minimize justice involvement due to those unmanaged needs, including:
  - The Behavioral Health Solutions Center (opened in 2019), which offers:
    - A Crisis Stabilization Clinic for up to five (5) days including private bedrooms, meals, inpatient treatment and coordination of outpatient treatment, group counseling, engagement activities, transportation, and assistance with transitioning into community living;
    - A Transitional Shelter for up to thirty (30) days including all of the supports available in the Crisis Stabilization Clinic;
    - On-site medical and behavioral health assessments, treatment planning, and resource navigation.
  - The Assessment, Intake, Diversion (“AID”) Center (target date of Summer 2022), which will offer:
    - On-site community and City partners to assess and support visitor needs including medical, legal, and other resources;
    - Short-term assessment and triage of physical, mental, and behavioral health needs while addressing outstanding warrants or other barriers to access services;
- Connection to housing and sheltering services including housing applications, hotel vouchers, and access to shelter and sober living services.

- The Department of Public Safety continues to invest in case management and clinician resources to assess, refer, and support community members in crisis through the 911 emergency resource system with a goal of avoiding unnecessary transport to emergency departments or arrest when possible. Additionally, the Community Corrections Division has added clinician and peer navigation resources to support individuals during their pre-trial or post-sentencing supervision period.
RECOMMENDATION 71

“Provide pre-release services to stabilize people with mental illness before transitioning them to wraparound community-based care.”

KEY AGENCIES – Denver Sheriff Department; Human Rights & Community Partnerships (HRCP)

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented as outlined below

Response Highlight

Pre-release services for individuals transferring from custody into community:

The following pre-release behavioral health services are offered to incarcerated individuals who are in Denver Sheriff Department facilities:

Treatment Options:
- The Women’s Mental Health Transition Unit treats incarcerated females with moderate to severe persistent mental illness.
- The High Acuity Transition Unit (HAT Unit) is available to individuals who present with significant symptoms of a major mental illness. The goal is to stabilize their acute psychiatric symptoms.
- DSD offers individual & group therapy sessions.
- Social work services from Licensed Clinical Social Workers.
- The Presentence Reentry Coordinator Program provides services to pre-sentence individuals in need of behavioral health treatment. Program staff work to improve care coordination for individuals with shorter incarcerations.

Competency Services:
- The Denver Sheriff Restoration and Transition Unit (RTU) is offered to individuals with a serious mental illness.
- The Competency Enhancement Program provides mental health services to individuals awaiting an inpatient competency restoration bed.

Psychiatry Contacts:
- Psychotropic medication prescription and management

Substance Misuse Services:
- Recovery in Secure Environment (RISE) Program is a peer-led intensive substance use treatment and trauma therapy program.
- Medication-Assisted Treatment (MAT) Services provides services for individuals with verified opiate or alcohol dependence.

Reentry Services:
- Second Chance Center offers case management, mentoring, and resources to assist released individuals.
• Mental Health Center of Denver (MHCD) Behavioral Health Navigator connects individuals to mental health, psychiatry, and case management services with MHCD.

• Denver Courts are currently implementing The Wellness Program. A Peer Navigator connects incarcerated individuals to programs in the jail. Peer Navigators also connect with individuals post-release and serve as community connectors.

• The Frequent User Service Enhancement Program (FUSE) is a collaboration between MHCD and DSD. FUSE participants are frequently involved in the criminal justice system. FUSE seeks to achieve a seamless transition from jail back to the community and into intensive mental health treatment.

For more information about any of these programs and services, see the Executive Summary and the Denver Sheriff Department Inmate Programs & Services webpage.

Executive Summary
Policies and procedures currently in place:

PRE-RELEASE BEHAVIORAL HEALTH SERVICES OFFERED TO INMATES WHO ARE IN DENVER SHERIFF DEPARTMENT FACILITIES

Treatment Options:

• The Women’s Mental Health Transition Unit is a 20-bed unit within Building 24 at the Denver County Jail. It provides those who participate with individual psychotherapy, skill development, group rehabilitation, transition planning, and medication management. It is specifically designed for the treatment of incarcerated females with Moderate to Severe Persistent Mental Illness. Programming consists of three groups per day (Mon-Fri), focusing on substance abuse, trauma recovery, parenting, healthy relationships, distress tolerance, communication skills, behavioral health education, medication management, stress management, women’s empowerment, and other “life skills.” Upon admission into the unit, all participants receive an individualized treatment plan and meet with a Social Worker weekly to address transitional needs. Participation in the program is completely voluntary, which means it cannot be court-ordered. Potential candidates can self-refer, or staff from the Denver Sheriff Department and/or Denver Health may make recommendations on an individual’s behalf. Participants may remain in programming for as long as the court system allows, provided they are actively working on their treatment goals and adhering to all Jail and Program rules.

• The High Acuity Transition Unit (HAT Unit) is for the purpose of providing a safer and more focused treatment setting for incarcerated individuals who present with significant symptoms of a major mental illness. Individuals housed in this unit will be encouraged to intermingle with other individuals and to practice appropriate social skills. They will have additional time out of cell each day with other participants to minimize their sense of isolation. Groups will be conducted to offer individuals the opportunity to learn or improve on social skills, problem solving skills, communication skills, interpersonal skills, anger management skills, medication management skills, and other practical means for managing their life and taking responsibility for their illness and symptoms. The overall goals for this unit are to assist the individuals in stabilizing their acute psychiatric symptoms by taking medications, if appropriate, by participating in a stable and supportive environment, and by receiving additional treatment interventions not available on other pods. The HAT unit will be available to all inmates.
Individual therapy sessions are offered to individuals within the jail system who are interested in therapeutic services and have at least four weeks until their release. The psychology team schedules a 50-minute therapy session for 8 sessions, focusing on solution-focused treatment.

Group therapy is offered in the treatment units at both the County Jail and the Downtown Detention Center, including but not limited to Dialectical Behavior Therapy (DBT), Seeking Safety, Healthy Relationships, Acceptance and Commitment Therapy (ACT), Stress Management and Life Skills.

Social work services include case management, 15 to 30-minute check-ins, resources both internally and externally, and therapy completed by Licensed Clinical Social Workers.

The Presentence Reentry Coordinator Program provides services to individuals in jail who need behavioral health treatment and are on pre-sentence status. The staff members working under this grant work to enhance and improve care coordination for individuals in jail with shorter incarcerations, which may prevent them from receiving more meaningful interventions by behavioral treatment staff. The coordinators are responsible for facilitating communication and collaboration between judicial and behavioral health systems. The target population includes adults 18 years of age and older that are residing in the jail awaiting sentencing.

Competency Services:

The Denver Sheriff Restoration and Transition Unit (RTU) is a voluntary male transition unit, providing therapeutic services, programming, case management and reentry planning, to individuals identified by the unit psychologist and case managers. Individuals in this unit must have a serious mental illness to be admitted to the program. In addition, 12 out of the 48 beds are used for individuals who are either awaiting a competency evaluation, working towards competency restoration, or have been restored to competency.

The Competency Enhancement Program is a program funded through Senate Bill 19-223 to provide jail-based mental health services to those awaiting an inpatient competency restoration bed. Funding is also to be used to provide mental health services to individuals who are returning to the jail after receiving restoration services at an Office of Behavioral Health (OBH) designated inpatient restoration facility. Coordination of services with the Forensic Support Team (FST) and Court Liaisons (Bridges) shall occur when a court order has been received for an evaluation and/or when an individual is identified to be in crisis by the jail at the time of booking or while incarcerated.

Psychiatry Contacts:

Psychiatrists, nurse practitioners, physician assistants and medical doctors are the prescribers of medications at DSD facilities. Once an individual is on psychotropic medications, they will be seen at least every four weeks by a prescriber.

- Medication Verification begins at intake when someone reports being on psychotropic medications and can take up to 48 hours to complete the process.
- Emergency medications may be given by a psychiatric provider when an individual is actively engaging in self or other harm.

Substance Misuse Services:

Recovery in Secure Environment (RISE) Program is a peer-led intensive substance use treatment and trauma therapy program. Individuals court-ordered into RISE are given top priority into the program. This program is supported by Empowerment and Mile High Behavioral Health Care.

Medication-Assisted Treatment (MAT) Services consist of 10 staff members, including MAT nurses, therapeutic case workers, case managers, and behavioral health technicians. An
individual may complete a MAT application to determine eligibility for the program. The individual must have verified opiate or alcohol dependence. In addition, if an individual is showing signs of intoxication or withdrawal at intake, the MAT team will screen the individual. The three MAT medications used at DSD include Suboxone, Naltrexone, or Vivitrol. The MAT team also provides Narcan for release and Narcan education for individuals with an opiate addiction.

Reentry Services:

- **Second Chance Center** - Established in 2012, Second Chance Center, Inc. (SCC) is a Colorado-based nonprofit organization determined to be the state’s premier community re-entry program and a model for the nation. SCC offers case management, mentoring, and vital resources to assist formerly incarcerated individuals in reestablishing their lives and becoming successful members of the community. SCC was chosen by the Crime Prevention and Control Commission (CPCC) as the reentry provider for the City and County of Denver in 2021.

- **Mental Health Center of Denver (MHCD) Behavioral Health Navigator** meets with incarcerated individuals either close to release or soon after release to assist in connecting the individual to mental health, psychiatry, and case management services with MHCD. Most individuals involved in the criminal justice system are either Level 1, High Intensity Treatment Team (HITT), requiring weekly face-to-face contact, or Level 2, Community Treatment Team (CTT), requiring every other week face-to-face contact.

- **The Wellness Program** is currently being implemented by Denver Courts. In order to be on the Wellness Docket, the following criteria must be met: municipal level charges, high jail utilizers, and a positive behavioral health screen at intake at DSD. There is one Peer Navigator, who is part of the Pretrial Team, and will connect incarcerated individuals to programs within the jail Monday through Friday. There are two Peer Navigators, who are part of the courts, and will connect with individuals post-release and will serve as community connectors.

- **The Frequent User Service Enhancement Program (FUSE)** – The Mental Health Center of Denver, in collaboration with the Denver Sheriff Department, has implemented the FUSE, a program providing access to much needed treatment services for up to 23 participants. These are individuals seriously challenged with co-occurring mental illness and substance use disorders who are frequently involved in the justice system. FUSE creates capacity within the community to outreach and engage adult offenders with these disorders in a higher intensity case management model using a 17:1 consumer to case manager ratio.

  - The approach integrates services essential for treatment and recovery from serious mental illness including the following services: intensive clinical case management services, medication evaluation, medication monitoring, substance use treatment, linkage and medical coordination with primary care, group therapy, residential treatment, supportive housing, and vocational and benefits acquisition/management.

  - The program also provides Integrated Dual Disorders Treatment, trauma specific treatment and Cognitive Behavioral Therapy treatment to reduce criminogenic risk factors. FUSE is closely linked with the Denver County Court and the on-site psychiatric nursing services at the Denver County Jail as well as the mental health transition units at the jail. FUSE is specifically designed to reduce repeated interactions with the criminal justice system by achieving a seamless transition from jail back to the community and into intensive mental health treatment with essential services supporting a successful recovery that includes reduced recidivism, decreased jail days, longer housing tenure, and improved recovery outcomes.
Additional information for reference:

- For more information about programs and services provided for persons in custody, click here.
RECOMMENDATION 72
“Create community-based treatment facilities to accept patients from jail who have clinical mental health needs, substance use disorders, and/or co-occurring disorders by leveraging HOME Investment Partnership Funds and Medicaid.”

KEY AGENCIES — Department of Housing Stability; Denver Department of Public Health and Environment

EXECUTIVE BRANCH RESPONSE STATUS — Decline for the reasons identified below

Response Highlight
- **HOME investment funding** is not available to create in-patient treatment facilities because it may be used only for providing housing.

Executive Summary
- **HOME investment funding** would not be applicable to in-patient treatment facilities because the funding is required to be used only for the specific purpose of providing housing. Eligible uses of HOME funds include: rehabilitation of owner-occupied housing; assistance to homebuyers to acquire/rehabilitate/construct homes (e.g., down payment assistance); rental housing activities (acquiring, rehabilitating, and constructing affordable rental housing); and tenant-based rental assistance.
- Governor Polis signed **HB22-1378** on May 31, 2022, which directs the State Division of Housing to award a grant to a local government in the Denver metropolitan area or a community partner in conjunction with a local government to build or acquire, and then facilitate, a regional navigation campus to respond to and prevent homelessness. The Governor’s proposed 2022 budget includes $95M for capital funding for regional recovery campuses, including $50M for one in the Denver area. The Governor also signed **SB22-211**, Ridge View Supportive Residential Community, which repurposes the Ridge View campus in Watkins into a supportive residential community for people experiencing homelessness.
- See also the **Response to Recommendation 30** regarding work ongoing at the State level to transform and improve behavioral health services and establish a framework for allocation and management of opioid settlement dollars.
RECOMMENDATION 73

“Assess the entire Denver Community Corrections continuum including probation terms, conditions, and length of supervision to measure the effectiveness in promoting public safety and successful reentry. Invest in ownership and control of county-owned facilities.”

KEY AGENCIES – Department of Public Safety, Community Corrections Division

EXECUTIVE BRANCH RESPONSE STATUS – In progress (to the extent within the jurisdiction of Denver’s Executive Branch)

Response Highlight

- Denver prioritizes investment and progressive change in the Community Corrections continuum. For example, the Community Corrections Division has recently advanced a new women’s residential community corrections program and a new men’s reentry program.
- The Executive Director of Safety’s Office and Community Corrections Division commit to work together to collect and use data to better understand outcomes for community corrections participants.

Executive Summary

- Denver has and continues to prioritize investment and programmatic changes in the Community Corrections continuum, as discussed below. Parts of this continuum are within the jurisdiction of the state and the judicial branch, and therefore, outside the jurisdiction of the Denver Executive branch.
- Related to investing in facilities and resources, Denver purchased the Tooley Hall facility previously owned and operated by a non-City entity and has conducted significant physical renovation to the facility for use as a women’s residential community corrections program through Project Elevate, managed by the Department of Public Safety’s Community Corrections Division in partnership with Empowerment Program.
  - The Community Corrections Division and the Denver Sheriff Department are cooperatively operating community corrections programming at the County Jail Work Release building, which in Fall 2022 will be fully integrated into Community Corrections as a men’s reentry program operated exclusively by civilian staff from the Community Corrections Division.
  - These programs represent substantial investment in structures, staffing, programs, and operations to serve the persons who will be located at these facilities.
  - Denver continues to actively explore the feasibility of potential real estate opportunities to expand City-owned and -operated facility options. City Council’s passage of the group living zoning code amendments will support these efforts.
- Denver is also an active partner in the State initiative to increase and improve community corrections programming outcomes through performance-based contracting. Additional information is available at Recommendations for Performance-Based Contracting for Colorado Community Corrections.
- The Executive Director of Safety’s Office is partnered with the Community Corrections Division to provide and expand analytical support to better understand the outcomes for persons engaged in
residential community corrections programs and is committed to continue to evolve processes and policies as informed by these data.
RECOMMENDATION 74
“Prioritize permanent supportive housing, prior to release, for chronically homeless re-entering adults with co-occurring disorders.”

KEY AGENCIES – Denver Sheriff Department; Department of Housing Stability

EXECUTIVE BRANCH RESPONSE STATUS – In progress, as described below

Response Highlight
• The Department of Housing Stability (“HOST”) serves incarcerated persons through the centralized intake system with the Metro Denver Homelessness Initiative’s Homelessness Management Information System. HOST’s Social Impact Bond and SIPPRA Programs work with justice-involved persons to find and stay in supportive housing.
• The forthcoming Assessment, Intake, Diversion (“AID”) Center includes plans for housing navigators and other physical, mental, and behavioral health resources.
• The Denver Sheriff Department (“DSD”) and its partners work with persons in custody to plan for re-entry into community and supportive services, including housing.

Executive Summary
• The Department of Housing Stability (“HOST”) serves incarcerated persons through the centralized intake system with the Metro Denver Homelessness Initiative’s Homelessness Management Information System. HOST’s Social Impact Bond and SIPPRA Programs specifically work with justice-involved persons to access and remain in supportive housing.
  o HOST prioritizes supportive housing primarily through the OneHome coordinated entry system, which has been described in other recommendation responses. Prioritization factors are agreed upon through a community process, and the prioritization for individuals currently includes whether the person has justice system involvement. In addition to this, HOST funds specific projects that target justice-involved persons.
  o State Housing Voucher (SHV) provides rental assistance and access to supportive services for extremely low-income individuals with a disabling condition, disabilities, or special needs who frequently use public systems, such as mental health institutes, who are experiencing homelessness or would be upon discharge/release. Referrals are made through regional Coordinated Entry systems, Colorado Department of Human Services’ Division of Child Welfare and Office of Behavioral Health, Colorado Department of Corrections’ Division of Adult Parole, and entities serving persons who need long-term supports and services in order to maintain housing.
  o Colorado Rapid Re-Housing for Re-Entry (COR3) is a time-limited, service-intensive housing stabilization intervention designed to assist households with prior or current justice involvement and behavioral health needs, that are experiencing homelessness, and those on the verge of homelessness, by providing case management and temporary financial assistance designed to secure and/or maintain permanent, stable housing for program participants.
COR3 is administered by the Volunteers of America Colorado Branch and accepts referrals from regional Coordinated Entry Systems and the Colorado Department of Corrections.
  
  HOST is a key funding partner working with the Denver Housing Authority (“DHA”), BlueLine Development, Inc., and Community Outreach Service Center, Inc. for development and provision of services for a supportive housing project at 3022 Welton Street called Charity’s House Apartments, which is intended to serve persons experiencing homelessness, including those who were previously incarcerated.

- See also the Responses to Recommendation 11, Recommendation 13, Recommendation 14 and Recommendation 19 for additional information about the City’s response to homelessness and Pathways to Housing.

- The forthcoming Assessment, Intake, Diversion (“AID”) Center (target date of Summer 2022) includes plans for funding proposals/requests for housing navigators who would be located at the Center, in addition to other community and City partners, to provide immediate assessments and connections for a variety of needs, including access to shelter and housing, and physical, mental, and behavioral health resources.

- The Denver Sheriff Department (“DSD”) works with persons in custody to plan for re-entry back into community and post-release supportive services, including identification of housing and other resources.
  
  DSD also utilizes grant funding to provide temporary hotel vouchers for persons upon release as an emergency housing mechanism to create opportunity for resources to work with the person to identify longer-term housing needs.

- The WellPower (formerly Mental Health Center of Denver) Frequent User Service Enhancement program (“FUSE Program”) works with those who are frequently in custody in Denver’s jail systems, defined as a person with a serious mental illness and or a co-occurring substance abuse issue who has been incarcerated in the Denver County Jail and/or Downtown Detention Center more than three times in the last five years.
  
  DSD identifies eligible persons and refers them for services at WellPower. The FUSE Program creates capacity within the community to outreach and engage adult offenders with serious mental illness and/or co-occurring disorders in a high-intensity case management model.
  
  This approach integrates services essential for treatment of serious mental illness including intensive clinical case management services, medication evaluation, medication monitoring, substance use treatment, linkage and coordination with primary care, group therapy, residential treatment, and benefits acquisition/management.
  
  The FUSE Program is specifically designed to reduce the “revolving door effect” by achieving a seamless transition from jail back to the community and into intensive mental health and/or substance abuse treatment and essential services that support a successful recovery and prevent recidivism.
RECOMMENDATION 75
(Comirement with Response to Recommendation 97)
“Implement new standards for DPD interaction with community members that are determined by community members via an open transparent and collaborative process in partnership with the Office of the Independent Monitor, Citizen Oversight Board, Civil Service Commission and Re-Imagining Policing Community Taskforce.”

KEY AGENCIES – Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part, as outlined below

Response Highlight
• Denver Police Department and Denver Sheriff Department work together with the Denver community in many circumstances. Examples include community participation on advisory boards and community organizations’ involvement in training and policy development.

Executive Summary
• Both the Denver Police Department (DPD) and the Denver Sheriff Department (DSD) collaborate directly with the Denver community in many circumstances and have adopted policies and protocols developed in coordination with community members and organizations. Examples include:
  o Consistent engagement between DPD and the Office of the Independent Monitor and Citizens Oversight Board to discuss and respond to community concerns and policy questions or recommendations. Examples include the participation of leadership from DPD as well as other Department of Public Safety leadership at COB Public Meetings and the OIM Bridging the Gap Program and Mediation Program.
  o The Denver Police Chief’s Community Advisory Board, made up of members of the community, provides advice on policies and matters impacting the relationship between DPD and the community. Additionally, each District Commander has an advisory board representing the local concerns of residents.
  o Adoption of the Active Bystandership for Law Enforcement (ABLE) Project, which prepares DPD Officers and DSD Deputies to successfully intervene to prevent harm and create a culture that supports peer intervention. The implementation of this program involved partnership with and oversight by the nationwide ABLE Project. Denver is also leading efforts to form a statewide collaborative of ABLE agencies. This collaborative will be established under the oversight of the ABLE Project to ensure fidelity and consistency of training and implementation. More information is available in the Response to Recommendation 93.
  o DPD and DSD both engage in multi-faceted outreach efforts across the City to keep the public apprised of news and events, and to build partnerships and solicit feedback by listening to community concerns. Examples of these efforts include:
    o Inviting members of the public to a town hall conversation with the Chief of Police during the George Floyd protests;
o Receiving advice from members of the Community Advisory Board to the Chief of Police and the Sheriff’s Advisory Board on policies and other matters that influence or impact the relationship between DPD and the Denver community;

o Providing an opportunity for community members to interact with officers and discuss current trends, themes, and topics at the Denver Police Community Academy through a multi-session interactive program available to members of the public via application;

o DSD and community engagement that includes back-to-school events with local youth, and informational sessions for community members provided at the DSD Training Academy.

o DPD’s “Back to Basics” program;

o Providing a forum for neighborhood residents to interact with and get to know DPD District commanders at the “Coffee with the Cops” events;

o Seeking input from community organizations on certain policies and procedures; for example:
  ▪ DPD Policy on Transgender Suspects and Arrestees (in collaboration with The Center)
  ▪ DPD Show-Up Identification Procedures (in collaboration with Together Colorado)
  ▪ DSD Transgender Inmate policies and Use of Force policies, both of which were developed with a community-focused working group

• Community participation in DPD tactical reviews, such as the Use of Force Review Board

• Promoting public education and partnership between DPD and the community through programs such as DPD Safe Place. The purpose of Safe Place is to assist victims of anti-LGBTQ+ bias-motivated crimes, to encourage reporting of these crimes, to reduce anti-LGBTQ+ bullying and harassment, and to provide a physical safe space for victims of crime while they await the arrival of police.

• Using DPD Community Resource Officers and members of the Citywide Impact Team to keep the community informed about important neighborhood issues and serve as liaisons between investigators and residents when there is a critical incident or bias-motivated crime.

• Specialty assignments such as DPD Community Resource Officers and the Citywide Impact Team;

• Engaging youth, adults, families, and local businesses to improve safety, education, access to resources, professional opportunities, and overall quality of life through programs like the Together with Westwood project;

• Maintaining strong partnerships between DPD and social justice and other grassroots organizations such as the Denver Dream Center, Together Colorado, Second Chance Center, Denver Ministerial Alliance, and many more.

• DPD’s collaboration with members of the community continues to evolve related to use of force trainings and policies emphasizing ongoing decision-making and utilization of the appropriate tactics, tools, and resources based on the situation presented. See the Response to Recommendation 52 for more detailed information regarding tools and methodologies such as Integrating Communications, Assessment, and Tactics (“ICAT”) Training, Crisis Intervention Team (“CIT”) Training, and integrated response resources such as Co-Responders and the Support Team Assisted Response (“STAR”) Program.
  o The DPD and DSD Training Academies both collaborate with local community members as well as external subject matter experts to inform topics and development of a wide range of trainings.

• See also the Response to Recommendation 101, discussing the Colorado Peace Officer Standards & Training (“POST”), including training standards, requirements, and mandated training materials
that officers must complete to receive and maintain peace officer certification. POST is governed by the Colorado Attorney General’s Office.
RECOMMENDATION 76
“Provide culturally competent and mandatory (as a condition of employment) routine mental health supports for officers to address the trauma associated with witnessing and intervening in violence.”

KEY AGENCIES – Department of Safety; Denver Police Department; Denver Sheriff Department; Denver Fire Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part as outlined below

Response Highlight
- Denver supports effective and easy to access mental, emotional, and physical health resources to support employees who have experienced trauma. There is a wide range of free resources for employees, as listed in the Executive Summary.
- The Department of Safety declines to pursue mandatory annual mental health appointments as a condition of employment because:
  - The Department supports total confidentiality for employees to access the resource(s) that will best meet their needs.
  - Requiring an employee to meet with a clinician once per year does not mean the employee will have a need or desire for the appointment.
  - Officers are not the only public safety employees exposed to trauma and violence in the course of their work. The Department of Safety agencies all prioritize mental health support resources for employees.

Executive Summary
- The Executive Branch supports effective and easy to access mental, emotional, and physical health resources to support employees in performing and processing their work and associated trauma exposures. Employees in the Department of Public Safety have access to a wide range of support resources to address the physical and mental trauma exposures related to their work, including:
  - The Citywide Employee Assistance Program and mental/behavioral health resources through City insurance plans;
  - Department-specific contracted resources for access to clinicians and trainings specific to the public safety industry and trauma, including dual-diagnosis PTSD and substance misuse;
  - Peer Support;
  - Chaplains Program;
  - Physical Therapy team;
  - Employee Outreach Program (DSD) and Early Intervention Program (DPD);
  - Alcohol Resiliency Programs (DPD and DFD);
  - Trauma Intervention protocols;
  - Critical Incident de-briefings/diffusings;
  - Yoga
Additionally, the Department of Safety agencies have created resource lists that include resources separate from the City to assist employees who prefer not to engage with a City-funded resource.

These services are provided for free to employees (and immediate family members for some resources) and can be accessed confidentially and voluntarily. Employees and supervisors can make referrals when they deem it appropriate.

The Department of Safety declines to pursue mandatory annual mental health appointments as a condition of employment for these reasons:

- The Department supports total confidentiality for employees to access the resource(s) that will best meet their needs. In the public safety industry, there is additional stigma to accessing mental and emotional health supports for fear of potential adverse impacts. To best promote a culture of mental, emotional, and physical health, the Department emphasizes a large variety of resources with many avenues to easily access without mandating use.
- Requiring an employee to meet with a clinician once per year does not mean the employee will have a need or desire for the appointment (for example, some employees may have low-exposure assignments). Any particular treatment method may also not be the best/most effective mechanism to process trauma for every person.
- Finally, we recognize that officers are not the only public safety employees exposed to trauma and violence in the course of their work. Other agency employees such as Denver 9-1-1 personnel, crime scene investigators, victim advocates, juvenile and adult supervision case managers, firefighters, deputies, outreach workers, and others may also have related experiences. Therefore, the agencies comprising the Department of Public Safety all prioritize mental health prevention and support resources for their personnel regardless of whether the employee’s role is uniform or civilian.
RECOMMENDATION 77
(Co-reference with the Response to Recommendation 112)
“Change the DPD internal investigation process and ensure internal procedural justice and accountability for officers who experience discrimination, targeting, bullying or silencing for speaking against injustice. This requires the Internal Affairs Bureau and Public Integrity Division be hired, fired and supervised NOT by Denver Police Department nor Sheriff’s but instead the Manager of Safety.”

KEY AGENCIES – Department of Public Safety

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; declined in part

Response Highlight
- Denver Police Department (DPD) and Denver Sheriff Department (DSD) have multiple rules and regulations that address the type of misconduct identified in this Recommendation. Specific rules are described in the full Executive Summary.
- The Responses to other Recommendations include information about the entities involved in the disciplinary processes for DPD and DSD employees, including civilian oversight.
- The Executive Branch declines to change the current disciplinary structure of the Safety agencies at this time.

Executive Summary
- The Denver Police Department has a number of rules and corresponding disciplinary procedures that address the type of misconduct identified in this Recommendation, including:
  - RR 102.1 Duty to Obey Departmental Rules and Mayoral Executive Orders
  - RR 114 Intimidation of Persons
  - RR 115.1 Conduct Prohibited by Law
  - RR 122.1 Respect for Fellow Officer
  - RR 122.2 Abuse of Fellow Officer
  - RR 138 Discrimination, Harassment, and Retaliation
  - RR 312.2 Interfering with Internal Investigation / Questioning
- The Denver Sheriff Department also has a number of rules and corresponding disciplinary procedures that address the type of misconduct identified in this Recommendation. Additional detail is available in the DSD Disciplinary Handbook starting at page 128. Examples of applicable rule violations include:
  - RR 200.4.7 Interfering with Investigator/Questioning
  - RR 200.15.1 Respect for Fellow Deputies, Employees, and Members of the Public
  - RR 200.15.2 Abuse of Fellow Deputies, Employees, and Members of the Public
  - RR 200.24 Discourtesy
  - RR 300.11.1 Conduct Prohibited by Law
  - RR 300.11.6 Conduct Prejudicial
  - RR 300.21.1 Discrimination, Harassment, Retaliation
  - RR 300.21.3 Impartial Attitude (Bias)
  - RR 300.23 Intimidation of Persons
  - RR 1100.3.1 Discrimination Against Member of Protected Class
• The Responses to other Recommendations include detailed information regarding the entities involved in the investigations and disciplinary processes for sworn employees of the Denver Police and Sheriff Departments, including the role of civilian oversight (Recommendation 112); the investigations and disciplinary processes for the Denver Police and Sheriff Departments (Response to Recommendation 90); and the Discipline Matrix model in place for both Departments (Response to Recommendation 91).

• The Executive Branch declines to change the current disciplinary structure of the Safety agencies at this time.
RECOMMENDATION 78
“Fund the District Attorney and Municipal Public Defender’s Office equitably to ensure caseload, facility and job classification parity.”

KEY AGENCIES - Denver City Attorney’s Office Prosecution and Code Enforcement Section; Office of the Municipal Public Defender

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented, as described below

Response Highlight
- This response compares the Municipal Public Defender’s Office (“OMPD”) with the City Attorney’s Office Prosecution and Code Enforcement Section (“PACE”). These two offices have already achieved parity in job classification, pay, attorney and staff numbers, and facilities.

Executive Summary
- The jurisdictional equivalent to the Municipal Public Defender’s Office (OMPD) is the City Attorney’s Office Prosecution and Code Enforcement Section (PACE); this response compares those two entities in response to this Recommendation.
- Since 2019, there has been job classification and pay parity between the prosecutors in PACE and the public defenders in OMPD.
- Generally, there is parity between attorneys assigned to courtrooms, with three prosecutors and three public defenders being assigned to each municipal courtroom. There is also caseload parity, with both PACE and OMPD carrying a caseload of about 75-77 cases per docket.
- There is parity between PACE and OMPD facilities; in 2022, OMPD will move into a new facility, which is currently under construction, while PACE’s offices are housed in the Wellington Webb Municipal Building.
- There are certain duties that both PACE and OMPD undertake that the other does not, but similarity still exists between the two to ensure both PACE and OMPD have the necessary resources to comply with such duties. For example, PACE has victim advocates on staff; the OMPD has a client support team and social worker/peer navigators in certain cases to support clients through the system to reduce recidivism and jail time.
RECOMMENDATION 79
(Co-reference with Recommendation 83)
“Implement mandatory annual training for every DPD officer on anti-racism and asset-based community development led by external BIPOC diversity and inclusion experts and allow community participation or monitoring to ensure quality.”

KEY AGENCIES – Department of Public Safety; Office of Social Equity and Innovation; Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:

Current State
- Denver Executive Branch agencies have conducted trainings focusing on equity, diversity, and inclusion (EDI) issues. Denver recognizes the importance of continued learning and improvements, as well as the need for community involvement.

Implementation Plan
- Audit of existing EDI and cultural humility trainings.
- Identify opportunities for further training.
- Create an action plan, including:
  o Designing specific trainings to address gaps and bring consistency across agencies; and
  o Identifying opportunities for community input and partnership.

Executive Summary
Policies and procedures currently in place or planned:

Current State
- Trainings with a focus on issues impacting equity, diversity, and inclusion (EDI) have taken place across the Denver Executive Branch agencies and Denver recognizes the importance of continued learning and improvements in this area, as well as the need for community involvement.

Implementation Plan
- In 2022, the Department of Safety and the Office of Social Equity and Innovation (OSEI) will partner to perform an audit of existing EDI and cultural humility trainings within Department of Public Safety agencies. Once this has been completed, a similar assessment will be performed of all of Denver’s Executive Branch agencies.
• The goal of the audits will be to gather a cohesive picture of training that has already occurred and to identify opportunities for further training.

• Department of Safety Human Resources will partner with OSEI to create a full action plan based on the results of the audit, including designing specific trainings to address gaps and bring consistency across agencies, with a focus on cultural humility and awareness of issues important to Denver’s diverse communities.

• A part of the Department of Safety’s action plan will include identification of opportunities for community input and partnership, including seeking input from the Citizen Oversight Board, Human Rights and Community Partnerships, and other established community groups to bring knowledge, best practices, and other insights into the process.

• The Executive Branch also encourages the other branches of Denver’s government to assess current and future needs for training with a focus on issues impacting equity, diversity, and inclusion.
RECOMMENDATION 80

“Prohibit the use of handcuffs, pepper spray, or physical restraints of any kind on minors.”

KEY AGENCIES – Department of Public Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Other

Response Highlight
- Denver Police Department and Denver Sheriff Department have specific policies and procedures in place for the use of restraints on juveniles. Both agencies minimize the use of restraints on juveniles when possible, but cannot adopt a full prohibition for safety reasons.

Executive Summary
- Denver Police Department (DPD) has the following policies and procedures in place related to the use of restraints on juveniles:
  - DPD uses cite and release rather than custodial arrest when possible for minors; for example, in most cases, minors are cited and released for violations of curfew or other infractions under the Denver Revised Municipal Code.
  - DPD limits use of handcuffing for persons under the age of 12. The Juvenile Intake Unit works in conjunction with the 2nd Judicial District Youth Detention Continuum program to use the minimal amount of restraint necessary to create a safe environment for the youth and staff while the youth is in police custody.
  - In 2019, DPD reviewed and updated Operations Manual 104.01 (15) (“Handcuffing Juveniles, the Elderly, or Those with an Intellectual / Developmental Disability”) to ensure alignment with best practices. DPD received input from the Office of the Independent Monitor on the revised policy. Key points of the policy include:
    - The decision to handcuff is made by the arresting officer and in consideration of the totality of circumstances presented, including safety concerns.
      - Circumstances for consideration include the level of risk the individual presents to themselves or others, the seriousness of the crime, and other factors, including whether the juvenile might pose a threat to themselves or others.
    - Persons reasonably believed to be twelve (12) or younger are not handcuffed unless circumstances (such as those discussed above) are evaluated and the officer determines handcuffing is the appropriate and necessary tool in that situation.
    - In cases where an officer handcuffs a person reasonably believed to be under the age of 12, the officer must articulate and document the specific reasons for the use of handcuffs in the arrest report or street check.
  - Denver Sheriff Department (DSD) policies, procedures, and training address and limit the use of restraints and control measures to only those situations in which such measures are reasonably necessary. At all times, only the minimal restraint necessary to safely control or deescalate the situation may be used. Appropriate use of restraint techniques and de-
escalation of restraint is addressed in training as well as policy. DSD policy also requires consultation with supervisors and medical health staff during situations that might require more restrictive methods of restraint.
  o DSD has restraint policies in place for the transport of persons regardless of age due to safety and security issues related to such transport. Most cases in which DSD transports minors occur when minors are charged as adults with serious criminal charges, such as homicide.

- Due to the need to consider the totality of the circumstances to determine whether the use of restraints may be reasonably necessary and appropriate, DPD and DSD decline to adopt a blanket prohibition on the use of any kind of restraint on minors. Complete prohibition on the use of restraints regardless of the circumstances presented would compromise the safety of community, bystanders, and law enforcement. Involved officers and deputies must have the ability to continually assess the situation and determine whether the use of a restraint may be reasonable and necessary based upon the person’s behaviors and risk level, regardless of age. Both agencies have policies requiring ongoing and situationally appropriate decision-making to determine appropriate tactics, resources, and partners to utilize in particular situations. See the Responses to Recommendations 52 and 93 for additional information.
- The use of physical restraints may be also be necessary to permit emergency responders to safely provide medical care on-scene, in an ambulance and/or during other medical emergencies. Examples include administration of intravenous fluids (IV) or circumstances in which the patient is under the influence of substances and exhibiting combative behaviors that may present an imminent risk of harm to medical personnel, the subject, and others.
RECOMMENDATION 81
(Co-Reference with Recommendations 93 & 98)

“Prohibit the use of Denver Police Department Gang Unit and all militarized responses and ‘mutual aid’ from surrounding municipalities in Denver-based protests and riots if there has not been documented proof of cross training of officers on Denver policies, procedures and ordinances. In the event that mutual aid ever occurs, every single officer assisting must be identifiable to the public by badge or nametag and some unique municipality identifier and Denver Police Department must log every name and post of every officer assisting and a commanding officer in DPD must assume all liability for anyone assisting.”

KEY AGENCIES – Department of Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part, to the extent feasible, as outlined below

Response Highlight
- The Denver Police Department (DPD) amended its Operations and Crowd Control Manuals to require digital rosters of all officers assigned to crowd control events. Training will be given to ensure rosters are consistent, even during unanticipated and/or unprecedented circumstances.
- DPD and the Denver Sheriff Department (DSD) uniforms display officer and deputy names and badge numbers per policy.
- DPD Chief Paul Pazen has worked with law enforcement partners in the Denver metro area to formalize standards and trainings in mutual aid situations.
- DPD has engaged in and will continue to do joint trainings with other law enforcement agencies to prepare for expectations and operations in mutual aid situations.
- All law enforcement officers in Colorado are required to comply with the Law Enforcement Integrity Act, including the protest provisions.

Executive Summary
- The Denver Police Department (“DPD”), starting in late May of 2020, responded to numerous unprecedented large-scale demonstrations beyond anything our city or other parts of the country had ever experienced. These unprecedented demonstrations often escalated into significant amounts of violence incited by non-law-abiding individuals present alongside peaceful protestors, endangering those who were present to peacefully protest, responding law enforcement officers, and other members of the general public, including bystanders and others who were merely trying to move through the areas where protests were happening, and resulting in extensive property destruction and damage. In Denver, the circumstances law enforcement confronted were extraordinary, and we recognize that extraordinary events may reveal potential gaps or opportunities for improvement in policies, practices, training, and procedures. Therefore, after the initial George Floyd protest response, the Department of Safety, DPD, and the Denver Sheriff Department (“DSD”) began to review our law enforcement’s response to the violence which erupted during the protests, including identifying areas of concern based upon that review, in addition to external complaints received, and worked as swiftly as possible to implement meaningful changes. Even today, the Department of Safety, DPD, and DSD continue to review best
practices and identify other opportunities for improvement. We are committed to implementing changes to ensure Denver law enforcement continues to utilize best practices based not only upon what we learned in Denver, but also what other law enforcement jurisdictions have learned throughout the country.

- In December of 2020, the Denver Office of the Independent Monitor (“OIM”) issued a report on DPD’s response to the George Floyd protests. The Report contained recommendations in four categories: Internal Controls, Use of Force, Mutual Aid, and Additional Review. DPD responded to the recommendations and created a public-facing dashboard to describe the specific changes made and provide additional information regarding DPD’s policies and procedures. DPD’s response to the OIM report can be found here. The Department of Safety and DPD also recognize there is still work to be done and will continue to focus efforts on identifying opportunities to improve upon existing policies, training, and procedures.

- Specifically, the DPD Operations and Crowd Control Manuals were amended to require the creation of digital rosters of all officers who are assigned to crowd control events (OMS 108.08(5)) and training will be provided to ensure rosters are consistent, even during unanticipated and/or unprecedented circumstances.

- DPD and DSD uniforms display officer and deputy names and badge numbers per policy. DPD and DSD personal protective equipment (PPE) also displays identifying information prominently in the event an officer or deputy’s uniform is obstructed or obscured while wearing the equipment.

- DPD previously had mutual aid agreements in place with neighboring jurisdictions but learned from these unprecedented protests that additional clarification regarding roles and response would be appropriate to ensure all law enforcement understands expectations related to crowd control response. Chief Paul Pazen has worked with law enforcement partners in the Denver metro area to formalize standards and trainings in mutual aid situations.

- Despite limitations and challenges created by the COVID-19 Pandemic, DPD has engaged in and will continue to do joint trainings with other law enforcement agencies to prepare personnel for expectations and operations in mutual aid situations. Both DPD and DSD personnel are currently undergoing Active Bystandership for Law Enforcement (“ABLE”) training (see Response to Recommendation 93), which prepares officers to successfully intervene to prevent harm and create a culture that supports peer intervention. Denver will partner with the ABLE Project to form a statewide training collaborative dedicated to active bystandership. Not only will this unify peer intervention policies and practices throughout the state, but larger agencies such as DPD will be able to pay it forward by helping departments with limited resources achieve a culture of bystandership as well.

- The Glossary contained in the Recommendations for Transforming Public Safety in Denver defines the term “militarized” as “the use of weapons, equipment, training, and tactics of war for routine police work.” It is unclear what this broad definition would cover; as explained in the Response to Recommendation 99, neither DPD nor DSD currently participates in programs to purchase or receive donated military equipment or weapons, nor is either agency’s personnel trained by the United States military or its contractors in the tactics of war to be used in routine police work.

- All law enforcement officers in Colorado are required to comply with the Law Enforcement Integrity and Accountability Act, including the protest provisions.
RECOMMENDATION 82
“Prioritize family unification for children separated from parents/guardians by allowing persons-involved to choose whose care they are placed in.”

KEY AGENCIES – Denver Human Services; Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented as outlined below

Response Highlight

Policies and procedures currently in place:

- The Department of Human Services (DHS) approves all placements of children in Denver and the state supervises DHS’s child welfare services.
- DHS follows Federal and State regulations when it places a child separated from their parent or legal guardian.
- This includes reasonable efforts to avoid out-of-home placement unless an emergency exists.
- When a child is removed from the custody of a parent or legal guardian, Denver Police Department policy requires that the officer must contact DHS to inform a social worker that child placement is needed. When parents are detained while caring for their children, Denver’s goal is to ensure that the parent/custodian has a choice about who they can designate as an alternate caregiver. Casework staff and DPD personnel both assess the alternate caregiver through search of available systems relevant to each agency.

Executive Summary

Current policies and procedures:

- In Colorado, child welfare services and programs are state-supervised and county-administered within all 64 counties. The Denver Department of Human Services (DHS) follows all Federal and State guidelines in the placement of children separated from their guardians due to government action.
- Colorado regulations followed by DHS require that assessment of abuse or neglect must include documentation of reasonable efforts to prevent out-of-home placement, unless an emergency exists, and to maintain the family unit. Reasonable efforts include, but are not limited to:
  a. Engaging family and extended family in safety planning, if appropriate;
  b. Providing in-home services, if appropriate and available;
  c. Removing the person(s) alleged to be responsible for the abuse and/or neglect from the home, rather than the child(ren)/youth, if possible;
  d. Working with the caregiver to place the child(ren)/youth in a safe environment, or;
  e. Engaging family and extended family in securing a kinship placement.
- In a situation in which a child is removed from the custody of a parent or legal guardian, Denver Police Department (DPD) policy on Taking Children into Protective Custody requires that the officer must contact DHS to inform a social worker that child placement is needed. DHS then determines such placement within state regulations, as outlined above. DHS approval must occur before officers make a placement, including placing a child with family members or relatives of the parent or guardian. Other than a parent or legal guardian, an officer must complete a warrant.
check and criminal history of any person agreeing to take custody of the child/children to ensure the safety and security of the child.

- When parents are detained while caring for their children, Denver’s goal is to ensure that the parent/custodian has a choice about who they can designate as an alternate caregiver. Once an alternate caretaker is identified, DPD contacts DHS through the Child Protection Hotline, which is available twenty-four hours a day, seven days a week. Casework staff and DPD personnel jointly assess the identified alternate caregiver by searching available systems relevant to each agency (DPD – criminal background databases; DHS – the statewide database, Trails). This process ensures that custodians have a say in the person they would like to care for their children and that children are cared for by safe caregivers with whom they are familiar.

- The DHS hotline is called for background checks not only for situations when a child is removed from the custody of a parent, but also any time a parent is requesting their child go to an alternate caretaker outside of a child abuse or neglect situation.
RECOMMENDATION 83
(Co-reference with Recommendation 79)
“Mandatory cross-agency training for law enforcement including but not limited to: public health, human services, community engagement, and housing approaches.”

KEY AGENCIES — Department of Public Safety; Office of Social Equity and Innovation; Department of Housing Stability; Department of Public Health and Environment; Denver Human Services; Human Rights & Community Partnerships

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; will implement further, as outlined below

Response Highlight
- Cross-training now exists for Department of Public Safety personnel on an issue- or assignment-specific basis.
- The relevant agencies are working together to identify and implement more cross-agency trainings.
- The Department of Safety and the Office of Social Equity and Innovation (OSEI) will partner for an audit of existing Diversity, Equity, and Inclusion and cultural sensitivity trainings for Department of Public Safety agencies in 2022. The same audit will take place for Denver’s executive branch agencies at a later date. The goal of the audit will be to get a picture of previous training and identify opportunities for future training, including cross-agency training opportunities.

Executive Summary
- Cross-training currently exists for Department of Public Safety personnel on an issue- or assignment-specific basis regarding the work of other City and partner agencies. Citywide, personnel also receive training in best practices and core concepts of service delivery through an equity, diversity, and inclusion and/or housing-first lens. Examples include Race and Social Justice training offered through the Office of Social Equity and Innovation and “Informed, Compassionate, and Positive Interactions with Persons Experiencing Homelessness” training, which is required for all City personnel.
- The City recognizes there are opportunities to coordinate and expand access to cross-training for employees to support their work serving Denver communities and the relevant agencies are currently working together to identify and implement trainings in this realm.
- The Department of Safety and the Office of Social Equity and Innovation (“OSEI”) will partner to perform an audit of existing Diversity, Equity, and Inclusion and cultural sensitivity trainings, first at the Department of Public Safety agencies in 2022, and then across Denver’s executive branch agencies at a later date (see Response to Recommendation 79). The goal of the audit will be to gather a cohesive picture of training that has already occurred and to identify opportunities for further training, including cross-training and expanded training with City partners.
- The Executive Branch also encourages the other branches of Denver’s government to assess current and future needs for cross-training.
RECOMMENDATION 84

“All law enforcement initiatives need to be evaluated by a neutral outside party (selected by the Crime Control & Prevention Commission) for effectiveness.”

KEY AGENCIES – Department of Public Safety; Department of Public Health and Environment; Department of Housing Stability

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part, as described below

Response Highlight
- The Department of Safety (DOS) is committed to evaluation of its programs and initiatives for effectiveness and impact on community safety and equity. DOS continues to invest in a multi-tiered approach to program and initiative design and evaluation. Evaluations have been and continue to be conducted by the Crime Prevention and Control Commission (CPCC), the DOS, the individual Safety agencies, other City agencies, and outside partners.

Executive Summary
- The Department of Safety (DOS) is committed to evaluation of its programs and initiatives to determine effectiveness and impacts to factors such as community safety and equity and continues to invest in a multi-tiered approach to program and initiative design and evaluation. Law enforcement initiatives as identified in this Recommendation may be created and operated by the DOS, other City agencies, or external entities. Even if programs are operated by other entities, data for evaluation of these programs may be provided by or analysis may be supported by the DOS, depending on the circumstances.
- Evaluations have been and continue to be conducted by the Crime Prevention and Control Commission (CPCC), the DOS, the individual Safety agencies, and other City agencies, as well as in partnership with external entities. Some examples include:
  - The DOS Transformation & Policy Division supports DOS agencies and partners in independent, complex, multi-entity evaluations and research to inform the progress of existing system performance and to create recommendations for future initiatives and improvement opportunities, such as the STAR Program and PNI initiatives described below.
    - The Urban Institute is evaluating the STAR Program (Support Team Assisted Response Program), which is managed by the Denver Department of Public Health and Environment.
    - In 2023, the University of Cincinnati will conduct an evaluation of the Place Network Investigations project, which is managed by the Denver Police Department.
  - The CPCC supports City agencies and partners in independent evaluations regarding CPCC-sponsored and -related programs and initiatives, such as the SIB (Social Impact Bond) and SIPPRA (Social Impact Partnerships to Pay for Results Act) initiatives managed by the Department of Housing Stability. See the Urban Institute for evaluation of these programs.
  - Evaluation of the LEAD Program (Law Enforcement Assisted Diversion Program) is currently underway by the University of Colorado.
RECOMMENDATION 85
(Co-reference with Recommendation 89)
“Make the Office of the Independent Monitor independent by changing appointment authority to City Council and the Citizen Oversight Board and implement a four-year term.”

KEY AGENCIES – N/A

EXECUTIVE BRANCH RESPONSE STATUS – Implemented in large part by the voters

Response Highlight
Current state:
- In the November 2021 election, the voters approved Question 2g, which will put the majority of this recommendation in place.

Executive Summary
Current State:
- In the November 2021 election, the voters approved Question 2g, which asked: “Shall the Charter of the City and County of Denver be amended to allow the citizen oversight board to appoint the independent monitor with consent of city council, providing the office of the monitor with independent legal counsel and establishing employment status of employees?” As a result, this recommendation has been implemented by the voters, with the exception of the four-year term recommendation.
RECOMMENDATION 86
“Guarantee subpoena power and allow Office of Independent Monitor unfettered access to all departmental documents and systems.”

KEY AGENCIES – Department of Public Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent feasible, as outlined below

Response Highlight
- The first part of the recommendation is already in place. The OIM has subpoena power as outlined in D.R.M.C. Sec. 2-388. - Internal investigations.
- The second part of the recommendation is not allowed under the law. As written, the recommendation seems to call for access to all information housed in the Department of Safety without limits on confidential and legally protected information. The relevant laws are provided in the Executive Summary.
- The Department of Safety will continue to work with the OIM to ensure access to all information needed to fulfill its duties and obligations.

Executive Summary
- The first portion of this recommendation is already implemented. The OIM currently has subpoena power as outlined in D.R.M.C. Sec. 2-388. - Internal investigations. This ordinance states:
  a. The department of safety and the police, sheriff, and fire departments shall cooperate with the monitor’s office in actively monitoring and participating in internal investigations, including being present to actively monitor interviews of witnesses and persons under internal investigation. The departments shall establish departmental policies regarding that cooperation. The policies shall ensure that the department of safety and the police, sheriff, and fire departments provide the monitor’s office with reasonable notice of and opportunity to attend interviews, the opportunity to make recommendations regarding investigations and reasonable timeframes to complete the steps in the internal investigatory process.
  b. For any investigation that it monitors, the monitor’s office shall review the investigation to ensure that it is thorough and complete.
  c. If the monitor’s office cannot certify that the investigation is thorough and complete, the monitor’s office may request that IAB conduct additional investigation.
  d. If IAB does not complete the additional investigation to the satisfaction of the monitor’s office, the monitor’s office may conduct additional investigation, including issuing subpoenas.
  e. The monitor’s office shall advise the board, manager of safety, and chief of police or undersheriff of the reasons that the monitor’s office was not satisfied with IAB’s investigation and of the additional investigation conducted by, or to be conducted by, the monitor’s office.
- The second portion of this recommendation is not permissible under the law. As written, this recommendation seems to call for access to all information housed within the Department of
Safety without any exception for information deemed confidential and protected by law. By way of example, the recommendation would encompass systems and documents for both civilian and sworn Safety employees, information housed in Safety Human Resources (including medical information), home addresses, Social Security numbers, Equal Employment Opportunity (“EEO”) related complaints for civilians, Fire Department records related to medical calls, National Crime Information Center (“NCIC”) records, juvenile records, sexual assault records, etc.

- Confidentiality requirements of the Americans with Disabilities Act (“ADA”), Family Medical Leave Act (“FMLA”), Health Insurance Portability and Accountability Act (“HIPAA”), and Colorado Healthy Families and Workplaces Act (“CHFWA”) require medical information be kept confidential and only disclosed on an “as needed” basis. There is no legal exception that would allow the OIM to have access to medical records for sworn personnel, and even fewer exceptions that would allow the OIM access to this information for civilians and firefighters.

- Additionally, employee information is protected by D.R.M.C. Sec. 2-271, - Confidentiality of home addresses and home telephone numbers of city officers, officials and employees, which states:
  
  It is the policy of the city to protect the home addresses and home telephone numbers of city officers, officials and employees so that they may perform their duties without fear of reprisal, retribution or intimidation. To this end, it is hereby declared that it would do substantial injury to the public interest to disclose the home addresses and home telephone numbers of any city officer, official or employee without their prior written consent.

- There are additional reasons, unrelated to employee records, why this recommendation as written cannot be implemented. For example, Safety houses records related to sexual assault victims and juveniles and has access to National Crime Information Center (“NCIC”) and Colorado Crime Information Center (“CCIC”) systems, which legally the OIM could not have unfettered access to without a change in the law (for example, see C.R.S. § 19-1-307(2)(a); 28 CFR 20).

- While this recommendation cannot be implemented as written, the Department will continue to work with the OIM to ensure access to all information needed to fulfill its duties and obligations.

- Additionally, for both the Denver Police Department and the Denver Sheriff Department, the OIM has been provided with legally appropriate access to the IAPro database. Through this database, the OIM is provided with access related to internal investigations. OIM is able to access any internal investigation as soon as the case is received and entered in the database. OIM may also request access to any other information it deems appropriate to fulfill its duties and obligations.

- Internal investigations regarding DSD are conducted by the Department of Public Safety’s Public Integrity Division (“PID”). Information about the DSD discipline process can be found here.

- Internal investigations regarding DPD are conducted by the DPD Internal Affairs Division (“IAD”). Information about the DPD discipline process can be found here.

- The Department of Public Safety works closely with the OIM to address any concerns related to information sharing or timely notification regarding internal investigations.
RECOMMENDATION 87
“Create an independent nomination and selection commission for both the City Attorney and Independent Monitor.”

KEY AGENCIES – N/A

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; Declined in part, as described below

Response Highlight
- In 2020, Denver’s citizens approved Measure 2E, which changed the process for City Attorney appointment.
- In 2021, the voters approved Measure 2G, which changed the process for appointment of the Independent Monitor.

Executive Summary
- In 2020, a majority of Denver’s City Council members voted to refer Ballot Measure 2E to the voters. Measure 2E asked: “Shall the Charter of the City and County of Denver be amended to give City Council authority to consent to certain mayoral appointments?” Appointment of the City Attorney fell within this category of appointments. Denver’s citizens approved this measure and the Denver Revised Municipal Code was amended to include this language. As a result, the voters have changed the process for City Attorney appointment.
- Related to the Independent Monitor, in 2021, Denver City Council unanimously voted to refer Ballot Measure 2G to the voters, which asked: “Shall the Charter of the City and County of Denver be amended to allow the citizen oversight board to appoint the independent monitor with consent of city council, providing the office of the monitor with independent legal counsel and establishing employment status of employees?” The voters approved this measure. The Denver Revised Municipal Code was amended to include this language. As a result, the voters have changed the process for appointment of the Independent Monitor.
RECOMMENDATION 88

“Ensure appropriate resourcing for the Office of the Independent Monitor by guaranteeing an annual budget appropriation that is proportionate to the entities the Monitor investigates at a minimum of 2% of their total budgets.”

KEY AGENCIES – Office of the Independent Monitor; Office of the Mayor

EXECUTIVE BRANCH RESPONSE STATUS – Decline (legally prohibited)

Response Highlight

- Neither the Taxpayer’s Bill of Rights (TABOR), nor the City Charter allows the Executive Branch to “guarantee an annual budget appropriation.” The Charter grants budget authority to the Mayor as approved by Council through Article VII. No Mayor may bind a future mayor to a budget and no Council may bind a future council to a budget as it would be an impermissible limit on future authority.
- The Mayor is required by City Charter to present a balanced budget each year to City Council. City Council then considers the budget, holds public hearings, (may consider amendments), and votes on approval of the budget.
- Denver publicly shares budget and spending information, including Denver’s yearly budget, broken down by agencies and departments.
- The Office of the Independent Monitor is an independent agency and goes through the same steps and processes as other agencies for their annual funding. The Office of the Independent Monitor’s 2022 budget information is available online.

Executive Summary

- Neither the Taxpayer’s Bill of Rights (TABOR), nor the City Charter allows the Executive Branch to “guarantee an annual budget appropriation.” The Charter grants budget authority to the Mayor as approved by Council through Article VII. No Mayor may bind a future mayor to a budget and no Council may bind a future council to a budget as it would be an impermissible limit on future authority. TABOR requires voter approval in advance for the creation of any multiple-fiscal year direct or indirect district debt or other financial obligation whatsoever without adequate present cash reserves pledged irrevocably and held for payments in all future fiscal years.
- The Department of Finance supports agencies Citywide in prioritizing spending needs and requests prior to presenting the budget proposals to the Mayor. The Mayor makes all final budgetary proposals considering City priorities and ensuring necessary and appropriate funding is provided to all agencies. The Mayor is required by City Charter to present a balanced budget each year to City Council. City Council then considers the budget, holds public hearings, (may consider amendments), and votes on approval of the budget. (See here for additional information about the roles and responsibilities related to the annual budget process).
  - Denver publicly shares budget and spending information, including Denver’s yearly budget, broken down by agencies and departments. Performance metrics, past spending, and current budget are broken down by categories, as well as detailed descriptions of budgetary changes.
The Office of the Independent Monitor is an independent agency and goes through the same steps and processes as other agencies for their annual funding. The Office of the Independent Monitor’s 2022 budget information is available online.

See the Response to Recommendation 102 for detailed information regarding Denver’s annual budgeting process.
RECOMMENDATION 89
(Co-reference with Recommendation 85)
“Protect the integrity of investigations by guaranteeing Career Service status of Office of the Independent Monitor non-managerial staff.”

KEY AGENCIES – N/A

EXECUTIVE BRANCH RESPONSE STATUS – Implemented by the voters

Response Highlight
Current state:
• In the November 2021 election, the voters approved Question 2g, which will put this recommendation into place.

Executive Summary
Current state:
• In the November 2021 election, the voters approved Question 2g, which asked: “Shall the Charter of the City and County of Denver be amended to allow the citizen oversight board to appoint the independent monitor with consent of city council, providing the office of the monitor with independent legal counsel and establishing employment status of employees?” As a result, this recommendation has been implemented by the voters.
RECOMMENDATION 90
“Establish clear documentation and discipline processes when there are violations for homophobic, transphobic, and/or misogynistic harassment or assaults by law enforcement. All allegations of mistreatment of the LGBTQ+/TGI community and women by law enforcement must be escalated and investigated by an independent body and consequences determined outside of the both the DPD and DSD.”

KEY AGENCIES – Department of Public Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part, as allowed by law; declined in part, as described below

Response Highlight
- There are several ways to file a complaint about an employee of the Department of Public Safety and its agencies.
- The Department of Public Safety has clearly defined investigation and discipline processes.
- Many policies and procedures address treating community members and co-workers appropriately, including women and members of the LGBTQ+ community.
- More information about specific investigation and discipline processes can be found in the Executive Summary, including links to agency information and the roles of civilian oversight in investigations and discipline.
- Sustained findings of certain allegations must also be reported to external entities, as described in the Executive Summary.

Executive Summary
- Disciplinary processes and the documentation of processes related to the investigation of allegations that Denver Police Department (“DPD”) or Denver Sheriff Department (“DSD”) personnel violated policies or laws related to the treatment of members of the LGBTQ+ community and/or women are already in place, consistent with legal parameters.
- Complaint Mechanisms:
  - There are several mechanisms to file a complaint about employees of the Department of Public Safety and its agencies, including uniform DPD or DSD personnel. Additional information about how to file a complaint is available on the Department website.
  - A complaint can also be filed directly with outside agencies, including the Equal Employment Opportunity Commission (“EEOC”) regarding employment or the Colorado Civil Rights Division (“CCRD”) regarding employment, housing, or public accommodations.
- Investigation and Discipline Processes:
  - There are clearly defined investigation processes regarding the types of allegations discussed in this Recommendation. Additional information is available regarding the DPD investigation and disciplinary processes and DSD investigation and disciplinary processes.
  - The types of allegations discussed in this Recommendation are addressed in the following City-wide, DPD, and DSD policies and procedures, including but not limited to:
- Career Service Rule 16-22
- Executive Order 112
- Department of Public Safety EEO Policy
- DPD OMS 118.02 Biased Policing

  - DSD Departmental Orders:
    - 1.00.1024 - Transgender Inmates (currently under revision)
    - 1.00.2010 - Human Relations/Code of Ethics and Standard of Conduct
    - 1.00.2023 - Prohibition of Sexual Harassment

- There are presumptive penalty ranges for discipline regarding sustained findings for the types of allegations discussed in this Recommendation, which can be found at the following links:
  - DPD Discipline Handbook:
    - RR-128.1 – Impartial Attitude;
    - RR-128.2 – Impartial Attitude – Bias;
  - DSD Discipline Handbook:
    - 200.15.2 Abuse of Fellow Deputies, Employees, and Members of the Public;
    - 300.10.2 Sexual Misconduct;
    - 300.10.3 Sexual Misconduct with a Prisoner;
    - 300.21.1 Discrimination, Harassment, and Retaliation;
    - 400.2.1 Discrimination, Harassment, or Retaliation against Prisoners;
    - 400.4.1 Humiliating, Cruel, or Harassing Treatment of Prisoners;
    - 400.6 Physical Abuse of Prisoners;
    - 1100.3.1 Discrimination Against Member of Protected Class.

- Additional background information about the DPD and DSD Discipline Matrix structure can be found in the Response to Recommendation 91.

- Review & Oversight:
  - Both DPD and DSD operate under civilian oversight from the Executive Director of Public Safety (“EDOS”) and the Office of the Independent Monitor (“OIM”).
  - In addition to the discipline process, the Department of Safety has a civilian Employee Relations Specialist whose job is to investigate and making findings on all allegations of EEO violations.
  - The OIM reviews all complaints made against uniform personnel in the DPD and the DSD and actively monitors investigations as discussed in the Denver City Charter, Denver Revised Municipal Code, and OIM Ordinance.
  - The OIM additionally reviews proposed findings and recommended discipline made by the DPD Conduct Review Office (for matters involving DPD uniformed staff), and by the Conduct Review Unit of the Public Integrity Division (for matters involving DSD uniformed staff).
  - The Safety Human Resources Division partners with the IAB or AIU to co-investigate allegations of possible harassment, discrimination, or retaliation made by City employees against a uniform employee of the DPD or the DSD.

- The EDOS issues orders of discipline by authority of the Charter. Orders of Discipline are provided to the Citizens Oversight Board each month and available for public review.
- The OIM publicly reports on patterns of complaints, findings, and discipline annually and semiannually, which reports are made publicly available.
- Sustained findings of certain allegations (including demonstrating a bias based on race, religion, ethnicity, gender, sexual orientation, age, disability, national origin, or any other protected class) must be reported to the Peace Officer Standards and Training (POST) Board and the officer or deputy could be subject to loss of their POST certification, which means they could not work as a certified law enforcement officer in the State of Colorado. Additional information is available about POST's certification database.
- Officers or deputies who have sustained findings for offenses involving bias based on race, religion, ethnicity, gender, sexual orientation, age, disability, national origin, or any other protected class are included on the “Brady Notification List” and this information must be disclosed to court officials, the prosecution, and defense whenever the officer or deputy is involved in a criminal matter as a party or witness. The Brady List flags law enforcement personnel with disciplinary history that could bring into question their credibility. Additional information is available regarding how the Denver District Attorney's Office manages Brady List disclosures.
RECOMMENDATION 91
“Create predictable disciplinary measures in violations of use of force policies including automatic termination in cases where life is lost at the hands of law enforcement where the victim was unarmed.”

KEY AGENCIES – Denver Police Department; Denver Sheriff Department; Department of Public Safety

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent feasible, as outlined below

Response Highlight
• Use of force is one of the most important issues that can impact the public’s trust and relationship with the Department of Public Safety and its agencies. There are specific legal requirements when officers and deputies are authorized to use lethal force. These are outlined in the Executive Summary.
• Denver Police Department (DPD) and Denver Sheriff Department (DSD) policies addressing the use of lethal force are provided in the Executive Summary. There are specific and predictable measures in place to address discipline for those who violate the policies.
• Both DPD and DSD operate under civilian oversight from the Executive Director of Public Safety (“EDoS”) and the Office of the Independent Monitor (“OIM”).
• The Denver District Attorney’s Office (“DA”) also has a specific Officer-Involved Shooting Protocol, which it follows to determine whether any officer involved in a use of force that results in death should be criminally charged.
• The law does not allow automatic termination as described in the Recommendation. Government employees are considered to have a property interest in their job that cannot be taken away without due process. The relevant disciplinary procedures are described in detail in the Executive Summary.

Executive Summary
• There are specific legal requirements regarding when peace officers are authorized to use lethal force. In addition to constitutional requirements outlined in case law, use of lethal force requirements are addressed in Colorado Revised Statutes § 18-1-707.
• The use of force, particularly lethal force, is one of the most important issues that can impact the public’s trust and relationship with the Department of Public Safety and its agencies. Denver Police Department (DPD) and Denver Sheriff Department (DSD) policies address the use of lethal force allowed in compliance with applicable law. There are specific and predictable measures in place to address discipline for officers and deputies who violate the use of force policy.
  a. Officers may use lethal force to make an arrest only when all other means of apprehension are unreasonable given the totality of the circumstances and
     • The arrest is for a felony involving conduct including the use or threatened use of deadly physical force;
     • The suspect poses an immediate threat to the officer or another person; and
- The force employed does not create a substantial risk of injury to other persons.

b. The use of lethal force is considered to be justified under the totality of the circumstances if the officer has an objectively reasonable belief that a lesser degree of force is inadequate and has objectively reasonable grounds to believe, and does believe, that the officer or another person is in imminent danger of being killed or receiving serious bodily injury.

- The DPD disciplinary handbook can be accessed here and provides the following with respect to the use of force:
  a. Officers shall not use inappropriate force in making an arrest or in dealing with a prisoner or any other person.
  b. A violation of Inappropriate Force may be a Conduct Category D through F violation.
  c. A conduct D violation applies to: Conduct Substantially Contrary To The Values of Its Mission, Operations or Professional Image, or that Involves a Demonstrable Serious Risk to Officer or Public Safety.
  d. A conduct E violation applies to: Conduct That Involves the Serious Abuse or Misuse of Authority, Unethical Behavior, or an Act that Results in Actual Serious and Adverse Impact on Officer or Public Safety or to the Professionalism of the Department.
  e. A conduct F violation applies to: Any Violation of Law, Rule or Policy Which Foreseeably Results in Death or Serious Bodily Injury to Another Person; or Constitutes a Willful and Wanton Disregard of Department Values; or Involves Any Act Which Demonstrates a Serious Lack of the Integrity, Ethics, or Character Related to an Officer’s Fitness to Hold the Position of Police Officer; or Involves Egregious Misconduct Substantially Contrary to the Standards of Conduct Reasonably Expected of One Whose Sworn Duty is to Uphold the Law; or Involves Any Conduct Which Constitutes the Failure to Adhere to Any Contractual Condition of Employment or Requirement of Certification Mandated by Law.
  - For a conduct Category F violation, the presumptive penalty is termination.
  - When a death occurs as the result of an officer’s actions, the involved officer or officers will be removed from any line duty assignment, pending the results of the administrative review.
  - This Discipline Handbook applies to all alleged misconduct and its development included community input. Both the DPD Operations Manual and Discipline Handbook are publicly available online and updated regularly to reflect any policy changes.

- Specific to the Denver Sheriff Department, the DSD Department Order 1.00.3013, Use of Force Policy, can be accessed here, and provides in part the following:
  a. Deputy Sheriffs may use deadly force only in response to an incident of Aggravated Active Aggression (defined as a deadly force encounter)
  b. For deadly force occurring outside of DSD Jail Facilities, deadly force may only be used when all other means or apprehension are unreasonable given the circumstances and:
     ▪ the arrest is for a felony involving conduct including the use or threatened use of deadly physical force; and
     ▪ the suspect poses an immediate threat to the deputy or another person; and
• the force employed does not create a substantial risk of injury to other persons.

c. In all instances, the use of deadly force by a deputy against an individual is authorized only if the deputy has an objectively reasonable belief that a lesser degree of force is inadequate and there are objectively reasonable grounds to believe, and the deputy does believe, that they or another person is in imminent danger of serious bodily injury or of being killed.

• The DSD disciplinary handbook can be accessed here and provides the following with respect to inappropriate uses of force, pursuant to RR-300.22:
  a. Deputy sheriffs and employees shall not use “inappropriate force” on a person, which is any use of force on a person that falls within the definition of “inappropriate force” established in the version of the DSD Use of Force Policy that is effective when force is used.
  b. A violation of RR-300.22, Inappropriate Force on a Person may be a Conduct Category D through F violation.
  c. A Conduct Category D violation applies to misconduct that, “(i) is contrary to the guiding principles of the Department or interferes with its mission to provide care and custody to inmates in accordance with those guiding principles; (ii) substantially interferes with the Department's operations or professional image; (iii) involves a demonstrable risk to the safety of a deputy sheriff, an employee, a detainee, or the public.”
  d. A Conduct Category E violation applies to misconduct that “(i) foreseeably results in bodily injury or otherwise results in an actual adverse impact on the safety of a deputy sheriff, an employee, a detainee, or the public; (ii) involves unethical behavior or a serious misuse of authority.”
  e. A Conduct Category F violation applies to misconduct that, “(i) foreseeably results in death or serious bodily injury; (ii) constitutes a willful and wanton disregard of Department guiding principles; (iii) involves any act so serious as to demonstrate a lack of the integrity, ethics, character, or fitness to hold the position of Denver deputy sheriff; (iv) involves any serious or abusive conduct contrary to the standards of conduct reasonably expected of one whose sworn duties are to uphold the law and to provide for the care and custody of detainees; or (v) involves any conduct that constitutes the failure to adhere to any conditions required by law, contract, or policy for employment as a Denver deputy sheriff.”
  f. For a Conduct Category F violation, the presumptive penalty is termination.

• Pursuant to Department Order 1.00.2012, “If a death or serious bodily injury has resulted from a use of force, the deputy will be removed from their line of duty assignment and/or placed on paid leave pending the investigation. The circumstances of each incident will determine how long the deputy will remain in this status.”

• This Discipline Handbook applies to all alleged misconduct and its development included community input. Both the DSD Department Orders and Discipline Handbook are publicly available online and updated regularly to reflect any policy changes.

• Additionally, both DPD and DSD operate under civilian oversight from the Executive Director of Public Safety (“EDoS”) and the Office of the Independent Monitor (“OIM”). The EDoS issues orders of discipline by authority of the Charter. The OIM publicly reports on patterns of complaints, findings, and discipline annually and semiannually, which reports are made publicly available. The OIM actively monitors all officer involved shootings and in custody deaths and provides input on policy changes.
• The Denver District Attorney’s Office ("DA") also has a specific **Officer-Involved Shooting Protocol**, which it follows to determine whether any officer involved in a use of force that results in death should be criminally charged.
  o If criminal charges are not filed by the DA, a decision letter describing the shooting is issued and provided to the public. The letter summarizes the District Attorney’s legal review of the shooting and is independent of any administrative investigation and review.

• Related to the second part of the Recommendation, the law does not allow “automatic termination in cases where life is lost at the hands of law enforcement where the victim was unarmed.” Government employees are considered to have a property interest in their job which cannot be taken away by the government without due process. Due process guaranteed by the U.S. and Colorado Constitutions requires that officers and deputies are given notice and an opportunity to be heard prior to the implementation of any type of discipline. When an officer or deputy uses lethal force, the totality of the circumstances is analyzed and a disciplinary determination made based on that specific analysis, which includes statements made by the officer. The Discipline Matrix for both agencies allows for aggravating or mitigating factors to be considered. The decision-maker then determines appropriate discipline based upon the Matrix, which may include termination depending upon the circumstances.

• Both DPD and DSD also have programs/processes in place to work with employees after a critical incident such as the use of force resulting in death to provide supportive resources and gradual return to full operational duties when appropriate. The DPD Victims Assistance Unit ("VAU") conducts outreach to and coordinates supportive services for families when there is a death during a critical incident, which can involve investigation updates and communications if desired by the family.
RECOMMENDATION 92
“Create a sanctity of life statement as a part of the Denver Use of Force policy.”

KEY AGENCIES – Department of Public Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Implemented

Response Highlight
Current state and planned implementation:

Current State
- Denver Police and Denver Sheriff Department use of force policies recognize the value and sanctity of human life.
- The Department of Public Safety adopted a Sanctity of Life Policy recognizing the value and sanctity of human life in all public safety interactions and services effective in January 2022.
- The Department of Public Safety will periodically review the Sanctity of Life policy and training materials for updates if needed.

Executive Summary
Current state and implementation plan:

Current State
- The Denver Police Department use of force policies and Denver Sheriff Department use of force policies specifically recognize the value and sanctity of human life.

Expanded implementation
- The Department of Public Safety adopted a Department-wide Sanctity of Life Policy recognizing the value and sanctity of human life in all public safety interactions and services provided by all personnel in addition to and support of the policies adopted by DPD and DSD. The Policy takes effect on January 1, 2022.
- The Department of Public Safety will develop and integrate periodic policy review and training materials regarding the Department-wide Sanctity of Life Policy.
RECOMMENDATION 93
“Mandate ‘duty to intervene’ & report in all Use of Force cases that extends liability to law enforcement who fail to intervene.”

KEY AGENCIES – Department of Public Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:

- Under federal and state law, all peace officers have a duty to intervene to prevent or stop another officer from using unlawful physical force and to provide a written report about the actions taken. This duty applies regardless of chain of command.
- DPD and DSD use of force policies include the duty to intervene and reporting requirements.
- Both departments joined the Active Bystandership for Law Enforcement (ABLE) Project in 2020. ABLE teaches officers how to intervene and create a culture of peer intervention.
- To become ABLE certified a law enforcement agency must adopt policies to ensure:
  - Interveners are not punished, targeted, or ostracized
  - Investigation of all instances of retaliation and failure to intervene
  - Accountability for officers when appropriate
- DPD and DSD will imbed ABLE intervention principals into workplace culture. Both departments will review related policies and processes for potential improvement.
- Denver will partner with the ABLE Project to form a statewide collaborative dedicated to bystandership.

Executive Summary
Policies and procedures currently in place or planned:

Current Policies and Procedures

- Pursuant to federal and recently passed state law, all peace officers have a duty to intervene to prevent or stop another officer from using unlawful physical force, regardless of the chain of command, and to provide a written report regarding the actions taken. Under Colorado law, C.R.S. §§ 13-21-131, 18-8-802 and 24-31-904, an officer’s failure to intervene to prevent the use of unlawful force may result in the filing of criminal charges. Additionally, if an internal investigation finds that a peace officer failed to intervene as required by Colorado law, discipline is required.
- DPD and DSD use of force policies include the duty to intervene and written reporting requirements.
  - DPD’s use of force policy, including the duty to intervene, can be viewed here. DSD’s policy on use of force, including the duty to intervene, can be viewed here.
  - Both policies clearly indicate that Denver law enforcement officers must intervene when they believe inappropriate force is being used by another law enforcement officer and they must also provide a written report related to the inappropriate use of force in which they intervened.
- In 2020, both DPD and DSD joined the nationwide Active Bystandership for Law Enforcement (ABLE) Project, which prepares officers to successfully intervene to prevent harm and create a
culture that supports peer intervention. ABLE training provides practical active bystandership strategies and tactics to prevent misconduct, reduce officer mistakes, and promote health and wellness. ABLE gives officers the tools they need to intervene in another’s actions when necessary.

- Any law enforcement agency wanting to become an **ABLE agency** must have or plan to adopt policies ensuring that:
  - Interveners are not punished, targeted, or otherwise ostracized;
  - All instances of apparent retaliation are promptly and fully investigated, and officers are held accountable for retaliation;
  - All apparent instances of failure to intervene, whether discovered during any use of force or other misconduct investigation, are fully investigated;
  - A successful intervention that prevents misconduct from escalating may potentially be a mitigating factor in any consequent disciplinary proceeding.

**Planned Policies and Procedures**

- DPD and DSD will continue to review all uses of force for the additional specification of failure to intervene when more than one law enforcement officer is present during the use of force.
- ABLE peer intervention principles will become fully engrained in the culture of both DPD and DSD.
- An act of misconduct by a law enforcement officer may negatively affect the reputation and legitimacy of departments in other jurisdictions. As such, Denver is leading efforts to form a statewide collaborative of ABLE agencies. Not only will this unify peer intervention policies and practices throughout the state, but larger agencies such as DPD will be able to pay it forward by helping departments with limited resources achieve a culture of bystandership as well. This collaborative will be established under the oversight of the ABLE Project to ensure fidelity and consistency of training and implementation.
**RECOMMENDATION 94**

(Co-reference with Response to Recommendation 108)

“Remove the civil service commission from the disciplinary process of law enforcement in Denver and replace with a Civilian Review Commission.”

**KEY AGENCIES** – Department of Public Safety

**EXECUTIVE BRANCH RESPONSE STATUS** – Decline (legally prohibitive under current Law)

**Response Highlight**

- The role and authority of the Civil Service Commission (CSC) is codified in the City Charter. The primary function of the CSC is hiring and promotion within the classified service and developing a process for discipline review.
- The CSC does not make disciplinary recommendations or decisions and does not hear initial appeals of discipline filed by members of the civil service (hearing officers hired by the CSC hear these appeals). The Charter requires the CSC to develop a process for disciplinary appeals, hiring hearing officers, and review appeals of the hearing officer decisions. Either party can appeal the hearing officer’s decision to the CSC or file a complaint with the Denver District Court. The CSC does not have a role in the District Court proceeding.
- Additionally, the CSC is not involved in the discipline of deputy sheriffs who are Career Service employees.
- The role of CSC extends beyond review of hearing officer decisions. The CSC is also responsible for hiring, background checks, promotional exams, and recruitment for civil service employees.

**Executive Summary**

- The role and authority of the Civil Service Commission (CSC) is codified in the City Charter. The primary function of the CSC is hiring and promotion within the classified service and developing a process for discipline review. Specifically, Charter Sec. 9.3.1 states, in part:

  “There shall be a Civil Service Commission, whose duties, powers and responsibilities shall include: establishing, fostering and maintaining a merit personnel system providing for the selection and appointment by the Manager of Safety to the Classified Service of the Denver Fire and Police Departments those determined to be the best qualified applicants and the promotion within the Classified Service of the best qualified members; establishing and administering a disciplinary and disqualification review process for members of the Classified Service; and other duties, powers and responsibilities as necessary to effectuate the intent of this Charter section.”

- The CSC does not make disciplinary recommendations or decisions and members of the CSC do not hear initial appeals of discipline filed by members of the civil service (hearing officers hired by the CSC hear these appeals). The Charter requires the CSC to develop a process for disciplinary appeals,

  1  hire hearing officers, and review appeals of the hearing officer decisions. There is no role for the CSC in the disciplinary process itself unless and until discipline has been issued to a civil service employee, the employee has filed an appeal, a hearing has been conducted, and a final decision has been issued by the hearing officer. After these specific procedures have been
completed, if either party is dissatisfied with the result, they can appeal the hearing officer’s decision to the CSC or file a complaint with the Denver District Court.

- Additionally, the CSC is not involved in the discipline of deputy sheriffs who are Career Service employees. Deputies are covered under Career Service Rules and Procedures, not Civil Service rules and procedures. There would be no authority for the CSC, or any replacement commission, to interact with the Public Integrity Division, who investigate the conduct of deputy sheriffs.

- The role of CSC extends beyond review of hearing officer decisions. The CSC is also responsible for hiring, background checks, promotional exams, and recruitment for civil service employees.
RECOMMENDATION 95
“Conduct deeper background checks of law enforcement applicants in Denver to eliminate those with known histories of racism and discrimination. If any history of racism or discrimination is found (including racist body markings) the applicant will be disqualified.”

KEY AGENCIES – Civil Service Commission; Department of Public Safety, Human Resources Division; Denver 9-1-1; Denver Fire Department; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented; will expand as outlined below

Response Highlight
Policies and procedures currently in place or planned:
- State law and city policy disqualify applicants who have committed certain crimes from becoming officers.
- Denver Rules disqualify applicants convicted of a bias-motivated crime.
- State law gives the city access to personnel records of applicants employed by government agencies in Colorado.
- Denver has specific qualifications and hiring standards for positions in law enforcement.
- Applicants must agree to an extensive background investigation into their character. This includes a behavior assessment that helps assess bias and cultural sensitivity.
- Applicants must disclose body art during their character and fitness assessment. DPD and DSD have policies on visible body art.
- Police and Sheriff Department recruiters will give applicants information on body art removal going forward.

Executive Summary
Policies and procedures currently in place or planned:

Current policies and procedures

- State law and Denver policies specify certain criminal charges that disqualify individuals from employment in the Denver Police Department. Specifically, C.R.S. § 24-31-305 addresses the circumstances under which peace officer certification will be denied, including for those convicted of any felony. Additionally, the City has established specific standards regarding Character and Background for prospective employees in the Denver Fire, Police, and Sheriff Departments as well as Denver 9-1-1 and the Public Safety Cadet and Explorer Programs (links to qualifications and hiring processes here). For the Denver Police and Fire Departments, Civil Service Commission Rule 3 specifically requires disqualification from hiring for conviction of a misdemeanor offense for any bias-motivated crime.
- State law, C.R.S. § 24-33.5-115, requires applicants for employment with a Colorado law enforcement agency to provide a waiver allowing access to their personnel records from any other Colorado agency so that law enforcement agencies may review government personnel records for all applicants.
• The current application process involves extensive background investigation into an applicant’s character and fitness, including questions specifically regarding emotional intelligence, bias, and discrimination that are asked of both the applicant and their character and employment references contacted during the process. Agencies are deliberate in their recruitment messaging to make it clear that Denver fosters an inclusive and respectful culture both in workplace and community relations.

• Applicants are required to disclose and describe any body art, including location on their body. This information is reviewed as part of the character and fitness process. Visible body art is noted by recruiters and background investigators, and applicants are reminded of Department policies regarding visible body art for DPD and DSD.

**Planned policies and procedures**

• The recruiting teams for the Denver Police and Sheriff Departments will begin providing information regarding body art removal and covering options at recruitment events and through candidate support and mentoring activities to support applicants who wish to remove or cover body art as they begin a career with the City.

• The relevant agencies will continue periodic review of relevant policies and procedures for updates and consistency with the law.
RECOMMENDATION 96

“Investigate and mandate that all current law enforcement officers with racist body markings, paraphernalia (masks), etc. are subject to termination especially if there have ever been allegations of racial discrimination.”

KEY AGENCIES – Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented as outlined below

Response Highlight

Policies and procedures currently in place or planned:

- State law and city policy disqualify applicants who have committed certain crimes from becoming officers.
- Denver has specific qualifications and hiring standards for positions in law enforcement. There is a background investigation into an applicant’s character and fitness, including questions about emotional intelligence, bias, and discrimination.
- Applicants must disclose body art during their character and fitness assessment. DPD and DSD have policies on visible body art.
- Concerns or complaints about employee body art may be made through several channels.
- The recruiting teams from DPD and DSD will work with Peer Support and Wellness teams to give information about body art removal and covering to support employees who wish to remove or cover body art as they continue their career with the City.

Executive Summary

Policies and procedures currently in place or planned:

Current Policies and Procedures

- State law and Denver policies specify certain criminal charges that disqualify individuals from employment in the Denver Police Department (DPD). Specifically, C.R.S. § 24-31-305 addresses the circumstances under which peace officer certification will be denied, including for those convicted of any felony. Additionally, the City has established specific standards regarding Character and Background for prospective employees in the Denver Fire, Police, and Sheriff Departments as well as Denver 9-1-1 and the Public Safety Cadet and Explorer Programs (links to qualifications and hiring processes here). For the Denver Police and Fire Departments, Civil Service Commission Rule 3 specifically requires disqualification from hiring for conviction of a misdemeanor offense for any bias-motivated crime.
- The application process for an applicant to a uniformed position in the Police or Sheriff Departments involves extensive background investigation into an applicant’s character and fitness, including questions specifically regarding emotional intelligence, bias, and discrimination that are asked of both the applicant and also their character and employment references contacted during the process. Agencies are deliberate in their recruitment messaging to make it clear that Denver fosters an inclusive and respectful culture both in workplace and community relations.
• Applicants to uniformed positions in the Police or Sheriff Departments are required to disclose and describe any body art, including location on their body. This information is reviewed as part of the character and fitness process. Visible body art is noted by recruiters and background investigators, and applicants are reminded of Department policies regarding visible body art for DPD and DSD.

• The DSD Uniform Policy requires the covering of tattoos that are inappropriate for work while on-duty or on-the-job (definitions available at policy link). The DPD uniform policy prohibits tattoos, body art, and markings that display extremism, hate, or are unbecoming of a law enforcement officer (definitions available at policy link). Specific provisions describe the reasonable person standard used to determine whether tattoos, body art, or markings fall in one of these categories and the process for investigation. Authorized methods for covering tattoos, body art, or markings are listed in the policy. Exemptions for medical, religious, and cultural reasons are allowed.

• Concerns or complaints regarding employee body art may be made through several channels, and depending on the nature of the complaint and potential specifications at issue, the complaint may be investigated through the DPD Internal Affairs Bureau, Safety Administrative Investigations Unit, or via the employee’s chain of command. All complaints are reviewed for potential policy or law violations and sustained violations are addressed in accordance with established disciplinary processes. Information regarding the Public Safety agencies’ disciplinary processes, including the specifications that are applied when a policy violation complaint is made and the considerations and ranges for penalties if the alleged violation is sustained, can be found in the DPD Discipline Matrix and DSD Discipline Matrix. The Department of Public Safety is committed to reviewing complaints and investigations for opportunities to update policies, procedures, and training.

• Additionally, the Office of the Independent Monitor (OIM) receives complaints, monitors agency investigations, and issues reports on complaints and discipline.

**Planned Policies and Procedures**

• The recruiting teams from DPD and DSD will work with these agencies’ Peer Support and Wellness teams to provide information regarding body art removal and covering options to support current employees who wish to remove or cover body art as they continue their career with the City.
RECOMMENDATION 97
(Co-reference with Responses to Recommendations 52 & 75)
“All emergency response training procedures should be developed with community involvement. Stakeholder groups should include those with lived experience of the policy being addressed.”

KEY AGENCIES – Department of Public Safety

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; in progress; will implement in part

Response Highlight
- The Department of Public Safety (DOS) is committed to working with the community.
- The DOS collaborates with many groups as resources for community collaboration, input, and responsiveness.
- The Responses to several other Recommendations have examples about the ways the DOS works with community. Examples include policies, procedures, and training.

Executive Summary
- The Department of Public Safety is committed to working with the community, including those with relevant lived experiences, to understand concerns from various stakeholders, cultural-responsivity issues, and clear and effective communication and transparency regarding policies, procedures, and training.
- The Citizen Oversight Board, the Office of the Independent Monitor, and the Crime Prevention and Control Commission are tasked by ordinance with making policy recommendations and oversight related to various aspects of the Department of Public Safety. See the Responses to Recommendations 8 and 112 for additional information. Leadership from the Department of Public Safety regularly engages and collaborates with these entities with regard to community concerns and policies and procedures.
- Additionally, the Department of Public Safety and its agencies collaborate with Human Rights and Community Partnerships (HRCP) as a resource for community collaboration, input, and responsiveness.
- The Response to Recommendation 75 details information about Denver Police and Denver Sheriff Department collaborations with the local community with regard to specific policies, procedures, and trainings.
- The Response to Recommendation 52 details information about the Denver Police and Sheriff Departments’ strategic investments in training, policies, and programs intended to maintain community safety while minimizing negative outcomes for individual community members, employees, and the community as a whole.
- Employees working for the Denver Police and Sheriff Departments as well as Denver 9-1-1 and the Street Enforcement Team receive training from members of the Denver community regarding cultural sensitivity, representation, and differing perspectives.
- Additional examples include, but are not limited to:
  - The Sheriff Advisory Board;
  - The Gang Reduction Initiative of Denver (“GRID”) Policy Steering Committee;
  - The Safety Youth Programs Youth Leadership Summit.
The Department of Public Safety agencies and divisions are committed to developing and supporting substantive relationships with community partners. See the Response to Recommendation 10 for additional information. The Office of the Executive Director of Safety, through the Transformation and Policy Division and Community and Government Affairs Manager functions, will continue to work across the Department to identify and expand community collaboration opportunities.
RECOMMENDATION 98
(Co-Reference with Recommendations 81 and 99)
“Prohibit use of riot gear, weapons and militarized approaches or responses during peaceful protests or demonstrations.”

KEY AGENCIES – Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent feasible, as outlined below

Response Highlight
- Denver supports the right to peacefully protest or demonstrate and has a long history of supporting safe and peaceful protests and demonstrations. The goal of operational plans is to balance protection of people and property with the least invasive presence whenever possible.
- In the interest of safety, the Denver Police Department (DPD) and the Denver Sheriff Department (DSD) must have access to a range of tactical tools to respond if any protest or demonstration turns violent. The actions of the persons present at the event dictate the type and level of response needed to protect persons and property.
- DPD and DSD policies and procedures are compliant with C.R.S. § 24-31-905, which provides specific requirements for law enforcement actions during protests.

Executive Summary
- The Denver Police Department (“DPD”), starting in late May of 2020, responded to numerous unprecedented large-scale demonstrations beyond anything our city or other parts of the country had ever experienced. These unprecedented demonstrations often escalated into significant amounts of violence incited by non-law-abiding individuals present alongside peaceful protestors, endangering those who were present to peacefully protest, responding law enforcement officers, and other members of the general public, including bystanders and others who were merely trying to move through the areas where protests were happening, and resulting in extensive property destruction and damage. In Denver, the circumstances law enforcement confronted were extraordinary, and we recognize that extraordinary events may reveal potential gaps or opportunities for improvement in policies, practices, training, and procedures. Therefore, after the initial George Floyd protest response, the Department of Safety, DPD, and the Denver Sheriff Department (“DSD”) began to review our law enforcement’s response to the violence which erupted during the protests, including identifying areas of concern based upon that review, in addition to external complaints received, and worked as swiftly as possible to implement meaningful changes. Even today, the Department of Safety, DPD, and DSD continue to review best practices and identify other opportunities for improvement. We are committed to implementing changes to ensure Denver law enforcement continues to utilize best practices based not only upon what we learned in Denver, but also what other law enforcement jurisdictions have learned throughout the country.
- In December of 2020, the Denver Office of the Independent Monitor (“OIM”) issued a report on the DPD’s response to the George Floyd protests. The Report contained recommendations in four categories: Internal Controls, Use of Force, Mutual Aid, and Additional Review. DPD responded to the recommendations and created a public-facing dashboard to describe the specific changes
made and provide additional information regarding policies and procedures. DPD’s response to the OIM report can be found here. DPD also recognized there is still work to be done and will continue to focus efforts on identifying opportunities to improve upon existing policies, training, and procedures.

- Additional information about policies and procedures related to Mutual Aid response can be found in the Response to Recommendation 81.
- For crowd control and management functions, including events such as protests and demonstrations, the DPD is the lead law enforcement agency for the City & County of Denver and develops and manages operational plans regarding protection of persons and property. The DSD may provide support to an operational plan, and in some limited instances or locations, may take the lead operational role. DPD’s Crowd Management Policy can be found here.
- Denver, through its Department of Safety and agencies, including DPD and DSD, recognizes and supports the right to peacefully protest or demonstrate and it has a long history of supporting safe and peaceful protests and demonstrations. The goal and purpose of operational plans is to balance protection of people and property with the least invasive and visible presence whenever possible.
- In the interest of safety to participants, bystanders, and assigned Public Safety personnel, the DPD and DSD must have access to a range of tactical tools to respond if any protest or demonstration turns violent. Both agencies make clear in policy and procedure that the actions of the persons present at the event will dictate the type and level of response needed to protect persons and property.
- DPD and DSD policies and procedures are compliant with C.R.S. § 24-31-905, which provides specific requirements for law enforcement actions during protests.
- Both DPD and DSD are committed to ongoing review of existing and emerging best practices and will update policies, procedures, and trainings accordingly.
- The Glossary contained in the Recommendations for Transforming Public Safety in Denver defines the term “militarized” as “the use of weapons, equipment, training, and tactics of war for routine police work.” It is unclear what this broad definition would cover; as explained in the Response to Recommendation 99, neither DPD nor DSD currently participates in programs to purchase or receive donated military equipment or weapons, nor is either agency’s personnel trained by the United States military or its contractors in the tactics of war to be used in routine police work.
- The Glossary contained in the Recommendations for Transforming Public Safety in Denver does not define the term “riot gear.” Denver police officers may don personal protective gear (“PPE”) of various types in response to the risk presented during different situations and calls for service. Depending on the situation and risk level presented, PPE could include items such as gloves, masks, body armor, helmets, or shields.
RECOMMENDATION 99
“Require public hearings prior to acquisition of retired military weapons, the purchase of which must be approved by City Council.”

KEY AGENCIES – Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented as outlined below

Response Highlight
Explanation of current state:

- **Executive Order 8** provides the contracting policies for the City.
- The Denver Police Department (“DPD”) and the Denver Sheriff Department (“DSD”) do not currently participate in programs to buy weapons or equipment from the United States military or one of its contractors.
- DPD does not currently purchase equipment or weapons from the United States military or one of its contractors.
- DSD does not currently purchase equipment or weapons from the United States military or one of its contractors. The DSD Honor Guard has non-commissioned rifles for ceremonial use that fire blanks only and are not part of the federal acquisition program.

Executive Summary

- **Executive Order 8** establishes the contracting policies for the City. Memorandum A for this Executive Order (“8A”) describes the contracting procedures, including required processes for approval of purchases and selection of vendors. Fiscal Accountability Rule 8.1 explains the policies and procedures related to purchasing goods for the City. City Council must approve all contracts valuing $500,000 or more.
- Neither the Denver Police Department (“DPD”) nor the Denver Sheriff Department (“DSD”) currently participates in programs to acquire weapons or equipment purchased from the United States military or one of its contractors.
- DPD does not purchase equipment or weapons from the United States military or one of its contractors. The last known purchase of such equipment was prior to 2008.
- DSD previously participated in equipment and weapons purchase programs through the United States military or one of its contractors but decided to discontinue participation and return all equipment and weapons in approximately 2015. By 2017, all weapons and equipment were removed from operational use and the return process began, finishing in 2020. The DSD Honor Guard does have non-commissioned rifles for ceremonial use that fire blanks only and are not part of the federal acquisition program.
RECOMMENDATION 100
“Require and publicize an annual, full inventory of all DPD weapons, munitions, chemicals, SWAT gear, body cams, tanks, vehicles.”

KEY AGENCIES – Department of Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Decline (Operationally Infeasible)

Response Highlight
• As a result of the 2020 OIM report and internal reviews, DPD strengthened and improved its gear and equipment inventory processes during large-scale response events.
• Both DPD and DSD have review and auditing measures for compliance with policies and procedures, including accounting for issued and used equipment and munitions.
• Neither DPD nor DSD participate in programs to purchase or receive donated military equipment.
• For security and tactical reasons, DPD and DSD decline to release their full inventory of resources and tools for preventing and investigating crime in Denver communities.

Executive Summary
• The Denver Police Department (“DPD”), starting in late May of 2020, responded to numerous unprecedented large-scale demonstrations beyond anything our city or other parts of the country had ever experienced. These unprecedented demonstrations often escalated into significant amounts of violence incited by non-law-abiding individuals present alongside peaceful protestors, endangering those who were present to peacefully protest, responding law enforcement officers, and other members of the general public, including bystanders and others who were merely trying to move through the areas where protests were happening and resulting in extensive property destruction and damage. In Denver, the circumstances law enforcement confronted were extraordinary, and we recognize that extraordinary events may reveal potential gaps or opportunities for improvement in policies, practices, training, and procedures. Therefore, after the initial George Floyd protest response, the Department of Safety, DPD, and DSD began to review our law enforcement’s response to the violence which erupted during the protests, including identifying areas of concern based upon that review in addition to external complaints received, and worked as swiftly as possible to implement meaningful changes. Even today, the Department of Safety, DPD, and the Denver Sheriff Department (“DSD”) continue to review best practices and identify other opportunities for improvement. We are committed to implementing changes to ensure Denver law enforcement continues to utilize best practices based not only upon what we learned in Denver, but also what other law enforcement jurisdictions have learned throughout the country.
• In December of 2020, the Denver Office of the Independent Monitor (“OIM”) issued a report on the DPD’s response to the George Floyd protests. The Report contained recommendations in four categories: Internal Controls, Use of Force, Mutual Aid, and Additional Review. DPD responded to the recommendations and created a public-facing dashboard to identify the specific changes it has implemented and provide additional information regarding policies and procedures related to protest response. DPD’s response to the OIM report can be found here. DPD also recognized there is still work to be done and is continuing to focus efforts on identifying opportunities to
improve upon existing policies, training, and procedures related to responding to the eruption of violence during protest activities.

- As a result of both the OIM report and internal reviews, DPD strengthened and improved its gear and equipment inventory processes during large-scale response events.
- Both DPD and DSD have established review and auditing measures to ensure compliance with policies and procedures in law enforcement operations, including accounting for equipment and munitions both issued and used. DPD’s inventory policy can be found at OMS 504.03 and its policy on firearm, less lethal systems, and chemical munitions inventory can be found at OMS 504.04.
- As explained in the Response to Recommendation 99, neither DPD nor DSD currently participate in programs to purchase or receive donated military equipment.
- Due to security and tactical considerations, DPD and DSD decline to release their full inventory of resources and tools for preventing and investigating crime in Denver communities. Detailed inventories regarding weapons, munitions, equipment, and materials contain sensitive details that, if released publicly, could compromise officer safety and ability to address public safety situations necessitating the deployment of lethal and less lethal weapons or personal protective gear.
RECOMMENDATION 101

“Establish a local licensing board and certification standards (in addition to POST certification) for Denver law enforcement officers as well as a process for revoking certification and a publicly searchable database of every DPD officer and their trainings and certifications as well as complaints against them.”

KEY AGENCIES – Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Decline to implement

Response Highlight
• Colorado Peace Officer Standards & Training (“POST”) manages certification and training standards for peace officers in Colorado.
• Agencies where peace officers work must report compliance with the required standards and training, among other information.
• POST has a public database that the public can search for an officer’s certification status and other information.
• Creating a separate process and standards for Denver officers would be duplicative to POST’s database and would risk creating inconsistent data and confusion.

Executive Summary
• Colorado Peace Officer Standards & Training (“POST”) is a unit of the Criminal Justice Section at the Colorado Attorney General’s Office, which oversees, documents, and manages the consistent and comprehensive certification and training standards for all peace officers working in Colorado jurisdictions. POST also has the ability to audit a law enforcement agency to ensure compliance. Additional information is available here.
• Pursuant to state law, agencies employing peace officers must regularly report compliance with the required standards and training, as well as personnel subject to disqualification from being a peace officer pursuant to state law and POST standards. Disqualification will occur if a peace officer fails to complete the required basic and annual training hours, is convicted of certain criminal charges, or after certain internal affairs/administrative findings that POST deems as decertifying, among other offenses. If a person is disqualified, they are decertified from peace officer status and cannot work for a law enforcement agency governed by POST anywhere in the State of Colorado. Information about decertification is available here and here.
• POST requires 556 hours of training in specific categories to qualify for basic certification. The curriculum materials are available here. The Denver Police Department Basic Recruit Academy requires that cadets complete almost twice that many hours. POST publishes information regarding the training provided by law enforcement agencies across the State on its website. More information is available here.
• Under Colorado law, beginning January 1, 2022, POST published and will maintain a database containing information related to a peace officer’s untruthfulness, repeated failure to follow POST Board training requirements, decertification by the POST Board and termination for cause. POST’s dashboards on this information are available here. Members of the public can search for a law enforcement officer’s certification status and disqualifying information here.
• Creating a separate certification process and standards for Denver law enforcement agencies would be duplicative to the standards, training, oversight, and database currently managed by POST. A Denver-only certification process and standards would potentially create inconsistency with other law enforcement agencies and state-wide qualifications to serve as a peace officer. Entering and maintaining records of training and disqualification criteria in multiple databases and reporting to the public about these differing processes and standards would also risk creating inconsistent data and confusion.

• Colorado’s open records laws also provide a mechanism for interested persons to request certain records related to disciplinary investigations or a particular employee. The law requires a balancing of the public interest in releasing the record against private interests, such as the employee’s right to privacy, as well as other factors. For more information, see the Colorado Open Records Act, C.R.S. § 24-72-200.1 et seq.

• The Office of the Independent Monitor publishes bi-annual reports summarizing complaints and discipline for employees of the Denver Police and Sheriff Departments. More information is available here. Additionally, issued orders of discipline are provided each month to the Citizens Oversight Board.
RECOMMENDATION 102
“Bring full transparency to the DPD budget both the process for determining the budget and granular detail of the money spent.”

KEY AGENCIES – Department of Finance; Department of Public Safety; Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part; will implement further as outlined below

Response Highlight
- Denver shares budget and spending information (for example, the yearly budget). This information is broken down by agency, including the Public Safety agencies.
- Additional financial reports and other information are also available to the public.
- The Mayor makes all final budgetary proposals and presents each year to City Council. City Council then considers the budget, holds public hearings, and votes on approval of the budget.

Executive Summary
- Denver publicly shares budget and spending information, including Denver’s yearly budget, broken down by agencies and departments. Performance metrics, past spending, and current budget are broken down by categories, as well as detailed descriptions of budgetary changes.
  - For example, the budget for the Department of Safety and its agencies for 2022 begins on page 761.
  - Detailed information about the Budget Calendar and Process, including key dates and the roles of agencies, the Mayor, and City Council (including public notice and hearing), can also be found in the yearly budget book. Budget hearings with City Council are televised and available to view on the City’s website.
  - The Department of Finance also provides annual budget process kickoff briefings to City Council regarding economic conditions, preliminary budget status and projections, and updates regarding the budget process and timeline (for example, the 2023 Budget Update to City Council).
- Additional financial reports and other information are also available to the public, including:
  - The Capital Planning and Programming Six Year Plan;
  - The City’s Fiscal Accountability measures;
  - Some examples of information available in the Transparent Denver portal include:
    - The Comprehensive Annual Financial Report (an independently audited accounting of city expenditures);
    - The Checkbook (a searchable database of city non-personnel expenditures paid);
    - Denver’s Revenue Information (City revenue received).
  - The Department of Finance has also created Denver’s American Rescue Plan Funding Dashboard to create transparency regarding use of federal ARPA funds.
• The agencies comprising the Department of Public Safety, including the Denver Police Department (“DPD”), are supported by the centralized Department of Public Safety Finance and Strategic Resource Division. The Finance and Strategic Resource Division works with leadership across the Department to prioritize spending needs and requests as part of the annual budget process. The Department of Finance supports agencies Citywide in prioritizing spending needs and requests prior to presenting the budget proposals to the Mayor. The Mayor makes all final budgetary proposals and is required by City Charter to present a balanced budget each year to City Council. City Council then considers the budget, holds public hearings, (may consider amendments), and votes on approval of the budget. (See link above for additional information about the roles and responsibilities related to the annual budget process).

• In context of the General Fund City budget, the Department of Public Safety comprised 38% of the projected 2022 Expenditure budget. The 2022 General Fund budget for the largest three Public Safety agencies allocates the majority of budget to personnel costs. Personnel compensation for these three agencies is negotiated through Collective Bargaining Agreements, which are legally binding and approved by City Council.
  o DPD has a $246M General Fund budget, 94.3% of which is personnel expenditures (compensation, overtime, health insurance, and other fringe benefits such as health benefits). The entirety of DPD’s 2022 budget, including all special revenue funds and grants, is $297.3M. Additional budget includes $24.5M in pension benefits and $19M for services and operations at Denver International Airport.
  o The Denver Sheriff Department (“DSD”) has a $158M General Fund budget, 79.6% of which is personnel expenditures. The entirety of DSD’s 2022 budget, including all special revenue funds and grants, is $161.6 million.
  o The Denver Fire Department (“DFD”) has a $129.5M General Fund budget, 96.1% of which is personnel expenditures. The entirety of the DFD’s 2022 budget, including all special revenue funds and grants, is $189.8M. Additional budget includes $27.3M in pension benefits, $19M for services and operations at Denver International Airport, and $6.5M in reimbursements for fire assistance services.

• The Department of Finance manages the City’s engagement with the National Community Survey (NCS), which includes community perceptions of safety and is posted to the City’s website. The survey was not conducted in 2020 or 2021 to address budget savings, but will resume in 2022. The Department of Safety considers the results of this survey when developing their budget as reflected in the response to Recommendation 28. The Department of Finance has sought public feedback and input through a Participatory Budgeting first phase pilot project, which involves community in determining spending for $1.7 million in capital projects addressing community infrastructure and mobility safety across the City. The Department of Finance is also leading a second round of focus groups and citywide community outreach to inform prioritization of the next disbursement of ARPA federal funds to the City.
RECOMMENDATION 103
(Co-reference with Recommendation 100)
“Conduct full and regular independent audits by the Denver Auditor of the DPD’s data and inventory including but not limited to: body camera technology, ticket cameras/wagons, speed detectors, surveillance technology, weapons and programs and policies.”

KEY AGENCIES – N/A

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented in part

Response Highlight
- The Denver Auditor is an elected, independent official. More information can be found here.
- Both the Denver Police Department and the Denver Sheriff Department have internal audit and inventory policies in place for gear and equipment.

Executive Summary
- The Denver Auditor is an elected, independent official. Additional information about the Auditor’s Office and the audit services it provides (including publicly available plans and reports) can be found here. The Auditor’s Office identifies and conducts audits on various City agencies, which could include policies, procedures, and/or items such as those discussed in this Recommendation.
- Both Denver Police Department and Denver Sheriff Department have strong internal audit and inventory policies in place regarding gear and equipment. These internal audit and inventory policies are discussed in the Response to Recommendation 100.
RECOMMENDATION 104

“Identify and eliminate financial incentives for overtime and/or double-dipping as a DPD officer on city contracts.”

KEY AGENCIES – Department of Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent feasible

Response Highlight

- The Fair Labor Standards Act (“FLSA”) and the Collective Bargaining Agreement between Denver and bargaining agents prevent changes to policies that affect overtime.
- The Denver Code of Ethics governs “possible conflicts of interest and time conflicts between city jobs and outside employment or business activity.”
- City employees receive guidance from the Ethics Handbook on outside employment and conflicts of interest.
- Denver Police Department and Denver Sheriff Department policies give guidelines for Secondary Employment, as outlined in the Executive Summary.

Executive Summary

- The Fair Labor Standards Act (“FLSA”) and the Collective Bargaining Agreement in place between the City and County of Denver and designated bargaining agents (Denver Police Protective Association for DPD and Fraternal Order of Police for DSD) prevent changes to policies that affect overtime.
- The FLSA requires, at minimum, payment of time and a half for all overtime over 171 hours in a 28-day work period.
- Compensation is a mandatory subject of collective bargaining. Overtime is part of officer compensation; thus, the City must bargain with the Police Protective Association or Fraternal Order of Police over any issues related to overtime and adhere to the Collective Bargaining Agreement.
- The Denver Code of Ethics governs “possible conflicts of interest and time conflicts between city jobs and outside employment or business activity.”
  - Employees must report “existing or proposed outside employment (excluding unpaid volunteer activity) or other outside business activity” and the City’s Board of Ethics is available to address questions or concerns regarding potential conflicts of interest related to business or outside activity.
  - Agency appointing authorities (executive leadership) are responsible for reporting to the Board of Ethics after receiving notice of an employee’s non-compliance with advisory opinions regarding potential conflicts of interest. The appointing authority is responsible for addressing concerns and taking needed appropriate actions.
  - There is a searchable Digest of Opinions available for anyone interested in reviewing advisory opinions and complaint responses issued by the Board of Ethics.
- The Denver Code of Ethics governs Additionally, City employees receive guidance from the Ethics Handbook, which addresses outside employment and potential conflicts of interest. Employees must report and request approval to participate in outside employment or business activity. This approval must be reviewed annually and the approval kept in the employee’s personnel file.
• The Denver Police Department (“DPD”) Operations Manual gives specific guidelines regarding policies and procedures for Secondary Employment in OMS 114.01 (Secondary Employment), OMS 114.02 (Secondary Employment: Non-Police Work), OMS 114.03 (Secondary Employment: Police Work), and OMS 114.04 (Department-Administered Overtime Assignments).
• Key relevant aspects of DPD’s Secondary Employment policies and practices include:
  o Secondary Employment coordination/management by DPD Secondary Employment Coordinator and Commanders;
  o Required disclosure forms and scheduling coordination including the scheduling of secondary employment hours in the Department’s official timekeeping system;
  o Policy of working no more than 16 hours in a 24-hour period and a weekly audit of hours worked by employee, performed by the Secondary Employment Coordinator;
  o Periodic audits by the Office of the City Auditor (every 2-3 years);
  o Training during recruit academy regarding policies and procedures for Secondary Employment and Court appearances/overtime.

• Denver Sheriff Department (“DSD”) Secondary Employment is addressed by Department Order 1.00.2022 (Secondary Employment).
• Key relevant aspects of DSD Secondary Employment policies and practices include:
  o Required prior approval and forms to engage in Secondary Employment with review every six months and the scheduling of secondary employment hours in the Department’s official timekeeping system;
  o Policy of working no more than thirty-two hours of overtime and/or secondary employment per week. Additionally, employees cannot work more than sixteen hours in a twenty-four-hour period (including regular shift hours, overtime, and/or secondary employment);
  o Periodic audits (internal and by the Office of the City Auditor).
RECOMMENDATION 105
(Co-reference with Recommendations 53 & 106)
“Collect data on deterrent function and crime resolution functions of surveillance.”

KEY AGENCIES – Denver Police Department

EXECUTIVE BOARD RESPONSE STATUS – In Progress, as described below

Response Highlights
- Denver Police Department uses HALO cameras in community safety efforts to deter and investigate crime.
- DPD commits to completing an annual data review plan of HALO cameras.
- DPD’s HALO camera policies can be found in the DPD Operations Manual Section 119.01

Executive Summary
- HALO cameras are used by the Denver Police Department (DPD) in community safety efforts for both crime deterrence and investigatory functions, to the extent a HALO camera captures footage that may be relevant to a criminal investigation. The utilization of the HALO camera system serves these important public safety functions in the following ways:
  - HALO footage assists in getting first responders to the right locations and provides an ability to assess whether additional resources are needed;
  - HALO footage may allow for a quicker response to an emergency or a criminal incident;
  - HALO footage helps keep situations from further escalating by providing responding officers with real time actionable information;
  - HALO footage can be utilized to either corroborate or exonerate allegations of criminal activity, among other functions.
- DPD commits to completing an annual data review plan of HALO cameras.
  - A publicly available online map of HALO camera locations that will be updated at least annually;
  - A Computer Aided Dispatch (CAD) aggregate data report that shows the numbers and types of calls that HALO technicians actively supported in a given year;
  - Annual gun assault and homicide data where HALO evidence was available in criminal investigations.
- Detailed policies about the use of fixed and mobile HALO cameras can be found in the DPD Operations Manual Section 119.01.
- DPD recently provided presentations to the City Council Finance & Governance Committee related to information about the HALO program, which can be viewed at the following links:
  - Video of February 1, 2022 presentation
  - Video of April 26, 2022 presentation
RECOMMENDATION 106
(Co-reference with Recommendations 53 & 105)

“Ensure that surveillance is appropriately deployed only in areas where there has been a proven impact on crime resolution.”

KEY AGENCIES — Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS — In Progress, as described below

Response Highlight
- Denver Police Department uses HALO cameras in community safety efforts to deter and investigate crime.
- DPD commits to completing an annual data review plan of HALO cameras.
- DPD’s HALO camera policies can be found in the [DPD Operations Manual Section 119.01](#).
- DPD uses data to ensure proper deployment of HALO cameras. The data includes crime and calls for service, volume of pedestrian and vehicle movement, volume of special events, potential for homeland security targets, and other considerations.

Executive Summary
- The Denver Police Department’s (DPD) Real Time Crime & Information Center operates a system of cameras and related hardware referred to as the High Activity Location Observation (HALO) system.
  - The purpose of the HALO system and placement of overt cameras in public places is to increase the safety and security of the community.
  - Having cameras present serves as a deterrent to crime and enables DPD to proactively watch for and respond to crimes in progress.
  - DPD currently operates 259 HALO cameras.
- Detailed policies about the use of fixed and mobile HALO cameras can be found in the [DPD Operations Manual Section 119.01](#).
- DPD commits to completing an annual data review plan. This plan will include:
  - A publicly available online map of HALO camera locations that will be updated at least annually;
  - A Computer Aided Dispatch (CAD) aggregate data report that shows the numbers and types of calls that HALO technicians actively supported in a given year;
  - Annual gun assault and homicide data where HALO evidence was available in criminal investigations.
- DPD utilizes data to ensure proper deployment of HALO cameras. Justification for removal or additional camera placement is and will be accomplished through a comprehensive assessment of the totality of circumstances that support the use of this limited resource. Circumstances to be considered will include crime and calls for service data. DPD will also consider volume of pedestrian and vehicle movement, volume of special events, potential for homeland security targets, and any other considerations brought forth by the affected District Commander, developed in part through conversations with City leadership and the community.
• DPD recently provided presentations to the City Council Finance & Governance Committee with information about the HALO program, which can be viewed at the links below:
  o Video of February 1, 2022 presentation
  o Video of April 26, 2022 presentation
RECOMMENDATION 107
“End Civil Asset forfeiture in Denver without due process.”

KEY AGENCIES – N/A

EXECUTIVE BRANCH RESPONSE STATUS – Other

Response Highlight
- Civil asset forfeiture is generally outside the purview of the municipal level criminal justice system. Colorado law governs seizure actions involving state and/or local agencies. For more information, see the state issue brief on civil forfeiture.
  - Civil asset forfeiture is a process through which law enforcement is legally permitted to seize property that may have been involved in the commission of a crime. For example, it may be utilized as a tool in situations such as organized crime and drug trafficking.
  - The State requires biannual public reporting regarding civil asset forfeiture activity.
  - In such instances, there are due process requirements handled by the Denver District Attorney’s Office.
- Nuisance abatement exists at the municipal level and is accompanied by the required due process. The nuisance abatement ordinance was revised in 2018 to include additional due process requirements. See Denver Revised Municipal Code, Chapter 37 Article II and Article III.

Executive Summary
- Civil asset forfeiture is generally outside the purview of the municipal level criminal justice system. Colorado law governs seizure actions involving state and/or local agencies. For more information, see the state issue brief on civil forfeiture.
- Civil asset forfeiture is a process through which law enforcement is legally permitted to seize property that may have been involved in the commission of a crime. For example, it may be utilized as a tool in situations such as organized crime and drug trafficking.
- The State requires biannual public reporting regarding civil asset forfeiture activity.
- In such instances, there are due process requirements handled by the Denver District Attorney’s Office.
- Nuisance abatement exists at the municipal level and is accompanied by the required due process. The nuisance abatement ordinance was revised in 2018 to include additional due process requirements. See Denver Revised Municipal Code, Chapter 37 Article II and Article III.
RECOMMENDATION 108
“Create a Civilian Review Commission with disciplinary power to replace the Civil Service Commission to work in partnership with the Office of the Independent Monitor, Citizens Oversight Board, Internal Affairs Bureau and Public Integrity Division.”

KEY AGENCIES – Department of Safety

EXECUTIVE BRANCH RESPONSE STATUS – Decline (legally prohibited under current law)

Response Highlight
- The role and authority of the Civil Service Commission (“CSC”) is written in the City Charter. The CSC’s main role is hiring and promotion in the classified service. The CSC also develops a process for discipline review.
- The CSC does not make disciplinary recommendations or decisions and does not hear initial appeals of discipline filed by members of the civil service. The Charter requires the CSC to develop a process for disciplinary appeals, hire hearing officers, and review appeals of hearing officer decisions. There is no role for the CSC in the disciplinary process itself unless and until discipline has been issued to a civil service employee, the employee has filed an appeal, a hearing has been conducted, and a final decision has been issued by the hearing officer.

Executive Summary
- The role and authority of the Civil Service Commission (“CSC”) is codified in the City Charter. The primary function of the CSC is hiring and promotion within the classified service and developing a process for discipline review. Specifically, Charter Sec. 9.3.1 states, in part:
  “There shall be a Civil Service Commission, whose duties, powers and responsibilities shall include: establishing, fostering and maintaining a merit personnel system providing for the selection and appointment by the Manager of Safety to the Classified Service of the Denver Fire and Police Departments those determined to be the best qualified applicants and the promotion within the Classified Service of the best qualified members; establishing and administering a disciplinary and disqualification review process for members of the Classified Service; and other duties, powers and responsibilities as necessary to effectuate the intent of this Charter section.”
- The CSC does not make disciplinary recommendations or decisions and does not hear initial appeals of discipline filed by members of the civil service. The Charter requires the CSC to develop a process for disciplinary appeals, hire hearing officers, and review appeals of the hearing officer decisions. There is no role for the CSC in the disciplinary process itself unless and until discipline has been issued to a civil service employee, the employee has filed an appeal, a hearing has been conducted, and a final decision has been issued by the hearing officer. After these specific procedures have been completed, if either party is dissatisfied with the result, they can appeal the hearing officer’s decision to the CSC or file a complaint with the Denver District Court. The CSC does not have a role in the District Court proceeding.
- Additionally, the CSC is not involved in the discipline of deputy sheriffs who are Career Service employees. Deputies are covered under Career Service Rules and Procedures, not Civil Service
rules and procedures. There would be no authority for the CSC, or any replacement commission, to interact with the Public Integrity Division, who investigate the conduct of deputy sheriffs.

- The role of CSC extends beyond review of hearing officer decisions. The CSC is also responsible for hiring, background checks, promotional exams, and recruitment for civil service employees.
RECOMMENDATION 109
“End no-knock warrants.”

KEY AGENCIES – Denver Police Department

EXECUTIVE BRANCH RESPONSE STATUS – Previously implemented to the extent feasible, as outlined below

Response Highlight
- The Denver Police Department (DPD) uses immediate entry warrants only in extreme, limited, and rare circumstances, and only with judicial review and prior approval.
- The Denver Sheriff Department does not utilize immediate entry warrants.
- Since July 1, 2020, DPD has not used any immediate entry warrants.
- DPD’s policies and procedures related to immediate entry warrants are here.
- DPD also publishes a semi-annual summary of immediate entry search warrants that have been executed, which is available here.

Executive Summary
- The Denver Police Department (“DPD”) uses immediate entry warrants only in extreme, limited, and rare circumstances, and only with judicial review and prior approval. The Denver Sheriff Department does not utilize immediate entry warrants.
- DPD’s use of immediate entry warrant tactics has steadily decreased. Since July 1, 2020, there have been zero immediate entry warrants used.
- DPD’s policies and procedures related to immediate entry warrants are located here.
- DPD procedures require extensive documentation of the use of immediate entry warrants, including detailed reporting that is submitted to the deputy district attorney or chief deputy district attorney who approved the affidavit and search warrant and the Judge who authorized the search warrant.
- DPD also publishes a semi-annual report summarizing immediate entry search warrants that have been executed, which is available here. The report is distributed to the Denver District Attorney and the Presiding Judge of the Denver County Court, among others within the City, as well as being publicly available.
- DPD is committed to ongoing review of existing and emerging best practices and will update policies, procedures, and trainings accordingly.
RECOMMENDATION 110
(Co-reference with Recommendation 111)
“Require police and Sheriff departments pay for abuse and misconduct claims or settlements beyond the statewide cap of $25,000 with personal insurance rather than from the city general fund.”

KEY AGENCIES — Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS — Decline to implement (legally prohibited)

Response Highlight
Explanation of Decline:
- Under state law, Denver cannot require its officers to carry personal liability insurance to pay for settlements or judgments.

Executive Summary
Explanation of Decline:
- Based upon Denver’s obligations under existing law, Denver cannot legally require its law enforcement officers to carry personal liability insurance to make officers liable to pay for settlements or judgments. C.R.S. § 13-21-131, which is part of the Law Enforcement Integrity Act, specifically requires an employer to indemnify its peace officers for any liability incurred by the peace officer and for any judgment or settlement entered against the peace officer for claims arising under the Act.
- The only exception to this requirement is if Denver determines that the officer did not act upon a good faith and reasonable belief that the action was lawful. If such a determination is made, the officer may be held personally liable for five percent of the settlement or judgment or twenty-five thousand dollars, whichever is less. However, if the settlement or judgment is not collectable from the officer, Denver is still required to pay it unless the officer was convicted of a criminal violation for conduct from which the claim arises.
RECOMMENDATION 111
(Co-reference with Recommendation 110)
“Require all law enforcement officers to carry personal liability insurance as a condition of employment.”

KEY AGENCIES – Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Decline to implement (legally prohibited)

Response Highlight
Explanation of Decline:
• Under state law, Denver cannot require its officers to carry personal liability insurance to pay for settlements or judgments.

Executive Summary
Explanation of Decline:
• Based upon Denver’s obligations under existing Colorado law, Denver cannot legally require its law enforcement officers to carry personal liability insurance and shift its indemnification responsibilities to make officers personally liable to pay for settlements or judgments. C.R.S. § 13-21-131, which is part of the Law Enforcement Integrity Act, specifically requires employers to indemnify their peace officers for any liability incurred by the peace officer and for any judgment or settlement entered against the peace officer for claims arising under the Act.
• The only exception to this indemnification requirement is if Denver determines that an officer “did not act upon a good faith and reasonable belief that the action was lawful.” If such a determination is made, however, the officer may only be held personally liable for five percent of the settlement or judgment or twenty-five thousand dollars, whichever is less. And, if the officer is unable to pay the portion for which the officer may be personally responsible, Denver is still legally required to pay the entire settlement or judgment unless the officer was convicted of a criminal violation for conduct from which the claim arises.
RECOMMENDATION 112
(Co-reference Response to Recommendation 77)
“Remove the Internal Affairs Bureau from within the Denver Police Department and merge it with the Public Integrity Division responsible for investigations of both police and sheriffs.”

KEY AGENCIES – Department of Public Safety; Denver Police Department; Denver Sheriff Department

EXECUTIVE BRANCH RESPONSE STATUS – Decline

Response Highlight
- The Executive Branch declines to adopt this Recommendation. DPD and DSD have many stages of review and oversight when there are allegations of employee misconduct. This includes civilian review and oversight for a strong system of transparency and accountability.

Executive Summary
- The Department of Safety and the Safety agencies have a multi-faceted oversight and professional standards structure in place for investigations and accountability when law enforcement personnel are accused of misconduct, including meaningful oversight by civilian organizations.
- Both the Denver Police (DPD) and Denver Sheriff (DSD) Departments have multiple stages of review and recommendation regarding allegations of misconduct concerning sworn members of these agencies.
  - The Public Integrity Division (PID), a fully civilianized division, is responsible for complaints about sworn members of the DSD and reports directly to the Executive Director of Public Safety’s Office.
  - The Internal Affairs Bureau (IAB) and Conduct Review Office (CRO) are responsible for investigating complaints about sworn members of DPD and report directly to the Chief of Police.
  - Both agencies adhere to the following general structural processes:
    - An investigative unit (the IAB for DPD and the Administrative Investigations Unit for DSD) reviews the allegations, identifies applicable policies and rules, and conducts fact-finding investigations;
    - A review unit (the CRO for DPD and Conduct Review Unit for DSD) reviews the investigations and makes recommendations of findings and appropriate disciplinary actions;
    - Due process meetings occur, during which the subject employee has an opportunity to respond to the allegations and proposed discipline sanctions with agency and Department of Safety leadership and the Office of the Independent Monitor;
    - An appeals process is available once discipline has been determined.
- Some structural differences in the DPD and DSD processes and procedures exist due to their respective legally binding Collective Bargaining Agreements, as well as the various legal rules that apply (DSD: Career Service Authority Rules; DPD: Civil Service Commission Rules). However, the fundamental checks and balances in the investigations and disciplinary
processes remain the same for both agencies. Additional information about the disciplinary processes can be found at the Responses to Recommendations 90 and 91.

- The multiple stages and layers of civilian review and oversight into concerns of employee misconduct in the DPD and DSD create a strong system of transparency and accountability, including the following:
  - Discipline above a written reprimand can only be issued by the civilian Executive Director of Public Safety or designee. The Chief of Police and Sheriff provide their recommendations regarding both findings and discipline, but the final decision is made and ordered by the Executive Director of Public Safety.
  - At every stage of the process, the civilian Office of the Independent Monitor (OIM) has access to review and make recommendations regarding the investigation, review, and recommendations. Detailed information about the OIM ordinance, role and responsibilities, and periodic public reporting, is available from the OIM.
  - Additionally, the Citizen Oversight Board (COB), consisting of community members appointed by the Mayor, is responsible by ordinance for appointing (with consent of City Council) and assessing the effectiveness of the Independent Monitor, hosting bi-weekly public meetings and quarterly public forums to address issues of community concern, making policy recommendations regarding hiring, training, use of force, community relations, the discipline and complaint process, and other items.

- Given this robust system, which adheres to the legal and operational requirements that are in place, the Executive Branch declines to adopt this Recommendation.