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Cover photo courtesy of Denver Sheriff Department.
March 21, 2019

AUDITOR’S LETTER

The objective of our audit of Denver Sheriff Department jail operations was to assess the effectiveness of the department’s efforts to ensure the safe and secure operation of the City and County of Denver’s jails—including an examination of operational trends and management practices that affect the safety and security of the jails for the public, staff, and inmates. I am pleased to present the results of this audit.

The audit revealed the Sheriff Department needs to strengthen its risk management processes to ensure that department leadership has a full understanding of risks to jail safety and security. Specifically, the department should develop comprehensive strategies for incorporating risk management into jail planning and operations. This should include a review of critical jail management practices—such as intake, classification, direct supervision, and incident response—to effectively identify and mitigate operational risks. Further, the Sheriff Department should develop a comprehensive data management approach to ensure the department has accurate and complete information to identify risks and evaluate the effectiveness of its internal controls. This data management plan should also include provisions for monitoring and evaluating the implementation of the department’s new jail management system to avoid the pitfalls of its current system.

Through stronger risk and data management, the Sheriff Department will be able to ensure that jail management practices effectively identify and mitigate risks to the safety and security of inmates and staff. Our report lists several related recommendations.

This performance audit is authorized pursuant to the City and County of Denver Charter, Article V, Part 2, Section 1, “General Powers and Duties of Auditor,” and was conducted in accordance with generally accepted government auditing standards. Those standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We extend our appreciation to the Department of Public Safety and Denver Sheriff Department personnel who assisted and cooperated with us during the audit. For any questions, please feel free to contact me at 720-913-5000.

Denver Auditor’s Office

Timothy M. O’Brien, CPA
Auditor
Jail Safety
March 2019

Objective
The objective of the audit was to assess the effectiveness of Denver Sheriff Department efforts to ensure the safe and secure operation of the City and County of Denver’s jails—including an examination of operational trends and management practices that affect the safety and security of the jails for the public, staff, and inmates.

Background
The Denver Sheriff Department is housed within the Department of Public Safety. It is the largest sheriff department in Colorado and is responsible for the safe and secure care, custody, and transport of prisoners for the City and County of Denver.

The department processes court-ordered civil actions, provides security for the City’s court system, and manages the City’s jails—including the operation of the Van Cise-Simonet Detention Center, the Denver County Jail, and the Correctional Care Medical Facility at the Denver Health Medical Center.

REPORT HIGHLIGHTS

Highlights

Fragmented Management Processes Prevent the Sheriff Department from Having a Comprehensive Understanding of Risks to Jail Safety and Security

Although not all factors impacting jail safety and security—such as the number of inmates, population characteristics, and staff retention challenges—are fully within the Denver Sheriff Department’s control, we found that the department lacks a comprehensive and systematic approach to identify and respond to risks—including factors that could adversely impact the safety of jail staff, inmates, and the public.

The department’s lack of holistic strategies for risk management contributes to a fundamental disconnect in the department’s understanding of how weaknesses in the design, implementation, and evaluation of its jail management practices can create systemic risks to jail safety and security. We identified fragmented and ineffective management processes that compound the department’s ability to identify and respond to the risks posed by the inmates it manages.

- Some of the department’s intake practices were inconsistent with leading industry practice or department policies.
- The department’s classification system may be compromised due to a lack of validation, override practices that primarily decrease custody levels, and a failure to periodically reassess inmate classification levels.
- Practices related to the daily supervision of inmates should be strengthened.
- The department’s incident response protocols and practices are fragmented and lack coordination.
- Ineffective data management practices weaken the department’s efforts to identify and respond to risks. Although steps have been taken to improve data management, fundamental gaps persist related to data collection, as well as ensuring transparent, accountable reporting occurs in objective, easy-to-use formats for decision-making.

As a result, we recommend the Denver Sheriff Department develop, document, and adhere to both a comprehensive risk management process and a comprehensive data management approach.

For a copy of this report, visit www.denverauditor.org or contact the Auditor’s Office at (720) 913-5000.
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BACKGROUND

The Department of Public Safety oversees and provides strategic direction and administrative support for public safety agencies in the City and County of Denver. The Executive Director of Safety, who is appointed by the Mayor, and his deputies are responsible for providing civilian oversight, leadership, and guidance to the City’s public safety agencies, including the Denver Sheriff Department.

The Denver Sheriff Department is the largest sheriff department in Colorado and is responsible for the safe and secure care, custody, and transport of prisoners for the City. In accordance with its responsibilities, the department processes court-ordered civil actions, provides security for the City’s court system, and manages the City’s jails.

The Sheriff, who is the department’s highest authority, is appointed by the Mayor and reports to the City’s Executive Director of Safety. Given the leadership structure of both departments, the Sheriff Department and the Department of Public Safety are jointly responsible for making and implementing decisions that impact City jail operations. Figure 1 provides an overview of the organizational structure of the Department of Public Safety in the context of Sheriff Department operations.

FIGURE 1. Public Safety Agencies’ Organizational Chart

Source: 2019 Mayor’s Proposed Budget information. Image designed by Auditor’s Office staff, with elements from “macrovector” and “Freepik” on Freepik.com.
In 2019, the Sheriff Department reorganized into four divisions with the stated aim of improving accountability and gaining operational efficiencies. The department’s four divisions are: Administration, Operations, Specialized Operations and Analysis, and Support Services. Table 1 provides additional information about how each of the divisions supports jail administration and operations.

**TABLE 1. Denver Sheriff Department Divisions**

<table>
<thead>
<tr>
<th>Division</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Administration</strong></td>
<td>Oversees departmentwide initiatives. Reviews internal affairs investigations to detect rule violations and develop recommendations for discipline to the Sheriff and the Executive Director of Safety through the Conduct Review Office. Manages programs to address inmate rehabilitation needs. Coordinates planning and analysis of expenses associated with medical care provided to inmates by Denver Health.</td>
</tr>
<tr>
<td><strong>Operations</strong></td>
<td>Operates and maintains the City’s jails and jail-support activities, such as intake and classification, inmate records management, housing, and medical services.</td>
</tr>
<tr>
<td><strong>Specialized Operations and Analysis</strong></td>
<td>Manages training for new recruits and existing staff. Investigates complaints of misconduct and coordinates with the Office of the Independent Monitor. Manages services related to abandoned, confiscated, or impounded vehicles. Provides court-related services, such as courtroom security, inmate transport, and the processing and delivering of restraining orders, eviction notices, judicial foreclosures, or court-ordered collection of juveniles or persons with mental illness. Provides inmate healthcare in partnership with Denver Health. The division also administers and oversees the department’s technical systems and data, as well as manages the department’s accreditation and the Assessment and Inspections Unit.</td>
</tr>
<tr>
<td><strong>Support Services</strong></td>
<td>Manages efforts to support the safe and secure operation of department facilities, including oversight of the K-9 unit. The Grievance and Incident Review Team administers and processes inmate grievances and evaluates incidents involving department staff.</td>
</tr>
</tbody>
</table>

Source: 2019 Mayor’s Proposed Budget.

**Denver Detention Facilities** – The City and County of Denver’s detention facilities include the Van Cise-Simonet Detention Center in downtown Denver and the Denver County Jail.

The Downtown Detention Center is the intake facility for all individuals arrested in Denver. Arrestees are booked, identified and arraigned, then either released on bond or processed for custody. The Downtown Detention Center is also the detention facility for inmates awaiting trial on felony, misdemeanor, and City ordinance violations. The County Jail, located northeast of downtown Denver, primarily holds all sentenced male inmates and all presentenced and sentenced female inmates for misdemeanor and City ordinance violations.

In addition to the Downtown Detention Center and the County Jail, the Correctional Care Medical Facility provides health care services to
inmates in a secure environment at Denver Health Medical Center.

Legal Considerations – Federal, state, and local laws influence multiple jail operations, including the basic rights of inmates. The Sheriff Department has developed internal policies and procedures—referred to as “department orders” and “post orders”—to guide the department’s operations and ensure compliance with applicable laws. In addition to department and post orders, the Sheriff Department also communicates job-related guidance through procedure manuals and less formal memoranda and emails.

Sheriff Department Roles and Responsibilities – Sheriff Department personnel consist of both uniformed and non-uniformed staff. Uniformed, or “sworn,” staff include deputy sheriffs and their supervisors; they are generally tasked with the overall management of department facilities, as well as maintaining the safety and security of inmates. Non-uniformed, or “civilian,” staff typically conduct support functions, such as monitoring facility security systems and providing administrative support.

The department’s sworn and civilian staff serve in a chain of command, all ultimately reporting to the Sheriff. The chain of command beneath the Sheriff includes deputy sheriff division chiefs, majors, captains, sergeants, and finally, deputy sheriffs. Deputies are assigned orders for specific job posts—their “post orders”—that include the housing units, corridors, and intake and classification areas, among others.

Training – All newly hired deputy sheriffs are required to successfully complete about 22 weeks of preservice training, including 16 weeks of classroom instruction and about four to five weeks of on-the-job training, also called “field training.” In accordance with accreditation standards, the curriculum for new deputies covers multiple topics—including applicable laws and policies and procedures to support safe and secure jail operations.

Veteran deputies are required to complete 40 hours of in-service training each year to enhance their skills and learn information on changes in either the law or in department policies and procedures. The Sheriff Department also requires all deputies to complete one week of crisis intervention training to provide deputies with the knowledge and skills to handle and prevent mental health crises. Additionally, the Sheriff
SHERIFF DEPARTMENT TRAINING

Denver Sheriff Department staff attend recent leadership and wellness training. (Photos courtesy of the Denver Sheriff Department.)
Department provides job-specific training, including supervisor training for those newly promoted to the rank of sergeant or captain.

**Budget and Staffing** – As shown in Table 2, in 2018 the Sheriff Department received nearly $143 million in general fund appropriations to support department administration and operations and 1,131 full-time equivalent positions—including authorization for 871 sworn positions and 260 civilian positions. The recommended appropriation for Sheriff Department administration and operations in 2019 was almost $152 million.

**TABLE 2. Denver Sheriff Department Appropriations, Fiscal Years 2015-2019**

<table>
<thead>
<tr>
<th></th>
<th>2015 Expenditures</th>
<th>2016 Expenditures</th>
<th>2017 Expenditures</th>
<th>2018 Appropriation b</th>
<th>2019 Recommended Appropriation c</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Fund Dollars</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Administration</td>
<td>$10,589,481</td>
<td>$22,717,750</td>
<td>$14,944,849</td>
<td>$21,291,591</td>
<td>$21,308,547</td>
</tr>
<tr>
<td>Operations</td>
<td>$108,030,014</td>
<td>$110,063,645</td>
<td>$123,481,563</td>
<td>$121,595,870</td>
<td>$90,113,217</td>
</tr>
<tr>
<td>Specialized Operations and Analysis</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>$37,772,697</td>
</tr>
<tr>
<td>Support Services</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>—</td>
<td>$2,785,969</td>
</tr>
<tr>
<td>TOTAL a</td>
<td>$118,619,495</td>
<td>$132,781,395</td>
<td>$138,426,412</td>
<td>$142,887,461</td>
<td>$151,980,430</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Personnel (Full-time Equivalent Positions)</strong></th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Civilian</td>
<td>228</td>
<td>243</td>
<td>247</td>
<td>260</td>
<td>269</td>
</tr>
<tr>
<td>Sworn</td>
<td>742</td>
<td>796</td>
<td>841</td>
<td>871</td>
<td>862</td>
</tr>
<tr>
<td>TOTAL</td>
<td>970</td>
<td>1,039</td>
<td>1,088</td>
<td>1,131</td>
<td>1,130</td>
</tr>
</tbody>
</table>

**Source:** 2019 Mayor’s Proposed Budget.

**Note:**

a The numbers in the table are rounded, but the totals were calculated using exact values. Therefore, in some cases, the total is slightly different than it would be if calculated using the rounded values in the table.

b The amounts shown for 2018 reflect appropriated funds, as opposed to the actual expenditures as reported for 2015, 2016, and 2017. The amounts shown for 2019 reflect recommended appropriation levels, as outlined in the Mayor’s 2019 Proposed Budget.

c In 2018, the Sheriff Department reorganized—adding the Specialized Operations and Analysis and Support Services divisions to the previously established Administration and Operations divisions. Fiscal year 2019 is the first year that the Mayor’s budget included recommended appropriations for the newly created divisions.
**Reform Efforts** – Between January 1, 2010, and June 28, 2018, the City paid an estimated $11.5 million in settlements, judgments, and attorney’s fees related to allegations of inappropriate use of force in the City’s jails. These payments ranged in amounts from $6 million for a use-of-force lawsuit settlement in 2014 to $4,650 for a use-of-force allegation claim settlement in 2017.

In August 2014, the City embarked on a comprehensive review of Sheriff Department operations in response to a series of controversies associated with uses of force and jail operations. This review resulted in over 400 recommendations to restructure several jail operations—including those related to intake and classification, direct supervision, and information reporting.

As part of its reform efforts, the department set up several new administrative and operations units, including 1) the Data Science Unit to collect and analyze data on jail administration and operations, and 2) the Assessment and Inspections Unit to ensure the Sheriff Department adheres to its policies and to recommend process improvements or training opportunities. Reference Figure 2 for a timeline of Sheriff Department reform efforts.

**FIGURE 2. Timeline of Denver Sheriff Department Reform Efforts**

- **August 2014:** Mayor Michael B. Hancock orders a top-to-bottom review of the Denver Sheriff Department to support reform.
- **July 2015 – May 2016:** Reform teams* for the Denver Department of Public Safety and Denver Sheriff Department evaluate recommendations and prioritize implementation efforts.
- **May 2015:** Mayor Hancock appoints an executive team to manage implementation of recommendations that resulted from the top-to-bottom review.
- **June 2018:** The Denver Sheriff Department reports that the majority of reform efforts have been implemented and independently validated.

Source: Auditor’s Office analysis of Denver Sheriff Department information.

Note: *The Department of Public Safety divided up the reform implementation teams into topic areas and named the teams as follows: Use of Force and Internal Affairs; Staffing and Performance Optimization; Leadership; Supervision and Strategic Planning; Training; and Human Resources.
To manage the City’s jails, the Sheriff Department relies on what are known as “direct supervision” principles. The National Institute of Corrections within the U.S. Department of Justice defines “direct supervision” as a jail management approach that combines physical jail design with operations strategies to manage inmate behavior to ensure safe and secure jail operations for inmates, staff, and visitors. Additionally, National Institute of Corrections’ studies have shown that direct supervision reduces assaults and other serious injuries among inmates.

The National Institute of Corrections identifies eight principles that should guide direct supervision:

- Effective control
- Effective supervision
- Competent staff
- Safety of staff and inmates
- Manageable and cost-effective operations
- Effective communication
- Classification and orientation
- Justice and fairness

While the physical configuration of inmate housing varies at the Downtown Detention Center and the County Jail, deputies working in both facilities are assigned roles and responsibilities that promote direct supervision.

**Intake and Classification** – Direct supervision relies on effective processes for intake and classification. Broadly, “intake” refers to the process of admitting inmates into the jail system. Through the intake process, jail staff execute a core set of procedures with the aim of confirming the identities of inmates, creating inmate records, and screening inmates for medical, mental health, and other needs that could impact confinement. “Classification” is an ongoing process, during which deputies collect and evaluate information gathered through intake and other sources to assess the risk an inmate poses to themselves, other inmates, and staff and to make determinations about

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2 The National Institute of Corrections is an agency within the U.S. Department of Justice that provides technical and programmatic assistance to local, state, and federal corrections agencies to support the planning and implementation of policies and practices aimed at improving operational and administrative efficiency and effectiveness.

inmate housing and other conditions of confinement. Based on the information provided, classification staff compile a social and criminal history of an inmate to determine the overall risk level.

Classification staff can consider a range of factors when assessing an inmate’s overall risk level—including the severity of the criminal offense and the presence of pending charges, affiliations with groups that could threaten jail security (e.g., gangs), the inmate’s history of violence and prior jail experience, the potential length of sentence, and the likelihood an inmate would escape. Because inmate classification is a continuous process, classifications should be regularly reviewed to ensure the appropriateness of an inmate’s overall risk level and their conditions of confinement.

In Denver, the Sheriff Department’s intake and classification processes typically begin after the Denver Police Department arrests an individual suspected of committing a criminal offense, as depicted in Figure 3.

According to department guidance, deputy sheriffs assigned to manage the intake process should review arrest documentation to ensure the Sheriff Department is authorized to detain the individual arrested. Deputies then search inmates and their personal belongings for weapons, ammunition, controlled substances, and other prohibited items. Deputies are required to complete thorough inventories of an inmate’s belongings found during searches, including money and other valuables, and to place the items in designated property storage bags. All personal belongings identified during intake are held by the Denver Sheriff Department until an inmate is released.

**FIGURE 3.** Denver Sheriff Department Intake and Classification Processes

- **ARREST**
  - The Denver Police Department arrests individuals suspected of committing a criminal offense. Individuals arrested are transported to the Downtown Detention Center.

- **INTAKE**
  - The Sheriff Department searches, photographs, and fingerprints inmates. The department also collects information on inmates’ general health and special needs.

- **TEMPORARY HOUSING ASSIGNMENT**
  - The Sheriff Department assigns inmates to a temporary housing unit until classification is completed.

- **CLASSIFICATION**
  - The Sheriff Department evaluates information collected at intake and from other sources to assign a classification level based on the threat an inmate poses to jail safety and security.

- **LONG-TERM HOUSING ASSIGNMENT**
  - The Sheriff Department assigns an inmate to a general housing unit based on the determined classification level.

*Source:* Auditor’s Office analysis of Denver Sheriff Department information.

*Note:* This figure contains a simplified depiction of how an inmate moves through the Downtown Detention Center. It does not capture the many nuances of individual and unique cases. At any point during or after receiving a temporary housing assignment, an individual may be released depending on the circumstances of their case.
Following inmate searches, deputies begin the admissions process—commonly referred to as “booking.” Sheriff Department policies and procedures require deputies to take initial photographs and fingerprints of all inmates. Additionally, deputies are required to:

- Assign unique booking numbers to track inmates during the booking process;
- Record basic personal information—including inmates’ addresses—to fulfill tracking and documentation requirements for the Sheriff Department, the courts, and other agencies;
- Record physical descriptions of inmates—including noting marks, scars, tattoos, or other unique identifying characteristics; and
- Complete thorough inventories of inmate belongings, including valuables and money.

In preparation for the classification process, deputies are also responsible for ensuring inmates complete an intake form that collects information on their general health and special needs. The form also contains questions about an inmate’s prior jail experiences, criminal history, gang affiliation, sexual orientation, and concerns or needs for separation, protective custody, or other special needs. Department policies and procedures also require all inmates booked into the jail to be screened by medical staff so medical histories can be collected and individuals can be evaluated for immediate medical, mental health, or alcohol and other substance abuse issues.4 5

Inmates remain in the intake area until identities have been confirmed through the Denver Police Department and until all booking procedures have been completed. Following the completion of these procedures, inmates are transferred to a temporary housing unit until the primary classification process is complete.

Deputies and other jail staff responsible for inmate classification oversee the administrative processes to ensure inmates are classified in a fair and consistent manner, in accordance with inmate custody levels. Specifically, classification deputies are authorized to:

- Hold classification and reclassification reviews to ensure inmate classification levels are accurate;
- Evaluate information from sources outside of classification (the Medical, Gang and Emergency Response units, etc.) to understand factors that could affect inmate housing;
- Assign custody levels to inmates;
- Make all inmate housing decisions; and

4 Denver Sheriff Department, Post Order 5.25.1063, Intake Search Officer (January 2018).
5 Denver Sheriff Department, Department Order 1.00.1012, Intake, Booking, and Release (December 2017).
• Provide inmates with program information to address special needs and related request forms.

Classification procedures stipulate that deputies evaluate all pertinent information collected during the intake process, conduct inmate interviews, and examine both inmates’ criminal histories and Sheriff Department historical data prior to making classification determinations and long-term housing decisions. Classification deputies use a decision tree to assign classification levels that considers a number factors for each inmate. These factors include:

• Current or past assaultive felony charges
• Known institutional behavior problems
• Escape history
• History of felony convictions
• Detainers, warrants, and other pending charges
• Status of sentencing
• Seriousness of current offense (felony versus misdemeanor)
• Family ties
• Sheriff Department alerts and special conditions, such as mental health alerts, medical needs, and separation requirements

As illustrated in Figure 4, inmates are assigned a classification level on a scale of one to five. Inmates who are assigned a Level 1 classification

**FIGURE 4. Inmate Classification Levels for Denver Sheriff Department**

Source: Auditor’s Office analysis of Denver Sheriff Department information. Photo courtesy of the Denver Sheriff Department.
pose the highest threat to the jail, requiring maximum security and restrictive housing. Inmates assigned a Level 5 classification pose the lowest threat, requiring minimum custody and considerably less restrictive housing.

Sheriff Department classification policies and procedures state that classification deputies may occasionally override the department’s computerized classification system, but they are required to note in the system the circumstances necessitating the override and they must inform the classification supervisor.

Incident Response – Within corrections, the term “incident” generally refers to an event that can adversely impact jail safety and security. Incidents can range in nature, scope, and threat posed to the jail, and they can include assault, sexual assault, use of force, or other events that can result in severe injuries or death of jail staff or inmates. According to the National Institute of Corrections, decisions made in response to incidents are critical to the success of direct supervision and in ensuring jail operations support and preserve a safe and secure environment for the public, staff, and inmates. These strategies should include tactics for:

- Assessing the nature, scope, and risks associated with an incident;
- Containing and stabilizing the incident area;
- Maintaining continuous operations in other areas of the jail;
- Determining appropriate intervention approaches, including removing endangered persons and obtaining treatment for the injured; and
- Developing plans to return the jail to normal operations.

The Sheriff Department relies on National Incident Management System incident response guidance to inform its critical incident response practices. The National Incident Management System is a comprehensive, nationwide, systematic approach to incident management, including the command and coordination of incidents, resource management, and information management.

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6 Reference Appendix C for more detail regarding incident types, including uses of force.
**Jail Management System** – To track and collect key information on pretrial detainees and inmates, the department uses an enterprise management system referred to as the “jail management system.” The jail management system is the central system used by the department for all inmate-related processes, from booking through release. Data recorded in the jail management system include information about inmates—such as age, gender, mental health status, and drug or alcohol dependency, and whether an inmate may pose a security threat.

The system is also used to record incidents involving a use of force by a deputy sheriff. Various other systems feed directly into the jail management system data fields. These systems include both the round-check information system, in which deputies record their completion of required physical checks on inmates, and the inmate accounting system for the department’s commissary. The Denver County Court scheduling system also interfaces with the jail management system to a limited extent and pulls over some contact, arrest, and charge information into the jail management system record from the Denver Police Department’s records management system.

**Denver Health and Inmate Health Care**

Since 1997, the Denver Health and Hospital Authority (Denver Health) has been the City’s contractor responsible for oversight and provision of all correctional health care services for arrestees, pretrial detainees, and inmates of the City and County of Denver. The authority renewed its operating agreement with the City on January 1, 2018.

Health care services are provided to inmates by Denver Health medical staff in the Downtown Detention Center and Denver County Jail or at the Correctional Care Medical Facility, a secure hospital unit owned and operated by Denver Health. Additionally, there are instances when care can be billed to the Denver Sheriff Department for individuals not in sheriff custody—such as when the Sheriff Department provides security for other jurisdictions, like inmates from other counties, other states, or federal correctional facilities.

Inmate interaction with medical care staff begins during the intake process at the Downtown Detention Center with a health assessment that also includes an initial mental health screening. Intake health assessments are documented in an integrated word processor in the jail management system. In contrast, the Sheriff Department documents all other health care provided at the Downtown Detention Center and County Jail on paper forms. When an inmate needs to obtain health

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10 An “integrated word processor” is a document or form that supplements an incident or other report in the jail management system. The information in the document is not searchable through system queries like other data elements collected in jail management system.
care at the Correctional Care Medical Facility, Denver Health sends a paper printout of the inmate’s chart back to the nursing staff at the jail for continuity of care.

Like other City employees, Denver Sheriff Department employees can submit workers’ compensation claims for work-related injuries or occupational diseases.

Claims are submitted to the Workers’ Compensation Unit of the City’s Risk Management Office, which is part of the Department of Finance. The Workers’ Compensation Unit is responsible for the intake, review, and administration of City employees’ claims and provides safety training and loss prevention for all City agencies.

The Workers’ Compensation Unit’s goals, among others, are to provide agencies and their employees with workers’ compensation education and guidance, to investigate claims to ensure their legitimacy, to provide appropriate medical treatment and return injured workers to their jobs as soon as medically possible, and to ensure any financial benefit due is paid in a timely manner.

In doing so, the City must comply with City ordinances, career service rules, and compensation terms in collective bargaining agreements, such as the one the Denver Sheriff Department has with the City and County of Denver.11

11 “Collective bargaining” generally refers to a negotiation between an employer and a labor union in order to reach an agreement on a variety of work-related matters, including wages, benefits, work hours, and so forth.
FINDING

Fragmented Management Processes Prevent the Sheriff Department from Having a Comprehensive Understanding of Risks to Jail Safety and Security

Managing a jail environment is a complex and challenging endeavor under the best of circumstances. The National Institute of Corrections notes that from intake through release, jail staff must assess and respond to a constantly changing mix of inmate characteristics and needs to manage the risk of adverse outcomes.\textsuperscript{12, 13} Further, jail administrators must manage within the context of several risk factors over which they have limited control.

However, among the issues over which the Denver Sheriff Department does have control, we found that the Sheriff Department lacks a comprehensive and systematic approach to identify and respond to risks—including factors that could adversely impact the safety of jail staff, inmates, and the public.

“Enterprise risk management” is a decision-making tool that allows leadership to understand an organization’s exposure to risk and understand how identified risks can adversely impact an organization’s success. Specifically, risk management is a comprehensive process that helps managers understand risk interactions throughout an organization, including how one risk can augment or offset another.

The Sheriff Department’s fragmented approach to risk management contributes to a fundamental disconnect in the department’s understanding of how weaknesses in the design, implementation, and evaluation of its jail operations can create systemic risks to jail safety and security.

Specifically, our analysis of the safe and secure operation of Denver’s jails revealed two primary concerns:

\begin{itemize}
  \item Insufficient direct supervision practices may be adversely affecting jail safety and security—particularly by inconsistent written policies versus day-to-day practices related to the intake and classification processes and the daily supervision of inmates and in the department’s fragmented coordination of and written guidance for incident response.
\end{itemize}

\textsuperscript{12} The National Institute of Corrections is an agency within the U.S. Department of Justice that provides technical and programmatic assistance to local, state, and federal corrections agencies to support the planning and implementation of policies and practices aimed at improving operational and administrative efficiency and effectiveness.

• Overall, the Sheriff Department also lacks effective and comprehensive strategies for risk management to identify and address potential risks within its jail facilities. This includes inadequate data management practices—from the collecting and coding of data, to the analyzing and interpreting of that data, to communicating that data to department stakeholders for use in decision-making.

By having day-to-day management practices that do not match formal, written policy and having a siloed approach to risk management, the Sheriff Department is unable to understand how weaknesses in jail management processes could negatively affect jail safety and security.

Before we discuss these subfindings, it is important to note the industrywide risks over which the City’s jail administrators have limited control. Both the crowding of jail populations and trends regarding staff retention and turnover present risks to the safe and secure operations of the City’s jails.

Inmate Population Crowding and Staff Retention and Turnover Create Risk to Jail Safety and Security

Jail Population and Crowding – Among the risk factors over which jail administrators have limited control is the number or types of individuals they are required to hold. As populations change, jail facilities may not be sufficiently designed to accommodate either the number or needs of a jail population.

The National Institute of Corrections identifies both adequate capacity and appropriate types of housing as key characteristics for an effective jail operation. Symptoms of crowding introduce stress across all jail systems and services when a jail reaches about 80 percent of its rated capacity —although not all jails may have the luxury of maintaining capacity levels at or below this percent.14, 15 The federal Bureau of Justice Statistics reported that in 2016, although 80 percent of local jail beds across the nation were occupied, 17 percent of local jails across the country operated at or above 100 percent capacity.16

Our review of jail population records from January 1, 2016, through July 31, 2018, found that although the daily count of inmates decreased between 2016 and 2018, capacity issues present challenges at both Denver jail facilities.


The Downtown Detention Center exceeded capacity for 37 percent of the days in our scope and exceeded its optimal range for 96 percent of the days in our scope. The County Jail exceeded its optimal range for 14 percent of the days in our scope. In addition, the Downtown Detention Center exceeded the National Institute of Corrections’ threshold for all the days in the scope, while the County Jail exceeded that threshold 91 percent of the days in the scope.

For the Sheriff Department, the percentage of days over these capacity thresholds indicates a jail system routinely under stress. Figures 5 and 6 on the following page provide the daily count for each facility in comparison to rated capacity, optimal range, and the National Institute of Corrections’ threshold for a system under stress.

Staff Retention and Turnover – Additionally, the National Institute of Corrections acknowledges that staff retention and turnover are well-known industry challenges that are not fully within management’s control. Even the best training does not fully prepare staff for the reality of working in the conditions of a jail, and some staff quickly decide that the environment is not for them. Similarly, retention incentives are often insufficient considering the challenging working conditions and the better opportunities that exist elsewhere. This turnover can lead to staffing shortages, reduced operational capability, and gaps in staff knowledge, skills, and abilities.

Our analysis identified that the department’s operational capability

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FIGURE 5. Daily Jail Population and Capacity for the Downtown Detention Center

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects daily population count data from January 1, 2016, through July 31, 2018. The data shown are an excerpt with an adjusted scale for ease of view in this document. Appendix C provides additional information related to this analysis, as well as the complete scale.

FIGURE 6. Daily Jail Population and Capacity for the County Jail

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects daily population count data from January 1, 2016, through July 31, 2018. The data shown are an excerpt with an adjusted scale for ease of view in this document. Appendix C provides additional information related to this analysis, as well as the complete scale.
averaged at about 87 percent over the past year—driven by leave, modified duty, and turnover. Voluntary resignations are a driver for turnover in sworn personnel, with personnel leaving the organization with increasingly fewer years of service. As a result, the Sheriff Department has a gap in the five- to 10-year level of its workforce, which could lead to a reliance in the future on less-experienced staff as other deputies near retirement.

Leading management practices direct organizations to retain staff with the necessary skills and abilities to achieve the organization’s mission through succession planning.\textsuperscript{19, 20} This succession planning is critical for the Sheriff Department—particularly considering the number of deputies nearing retirement and the department’s retention trends related to resignations after fewer years of service, as discussed below. Figure 7 provides a distribution of deputies and sergeants by length of service, as

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{fig7.png}
\caption{Deputies and Sergeants by Length of Service, as of July 31, 2018}
\end{figure}

Source: Auditor’s Office analysis of Denver Sheriff Department data.
Note: Appendix C provides additional information related to this analysis.


\textsuperscript{20} The Standards for Internal Control in the Federal Government—commonly referred to as the federal “Green Book”—may also be adopted by state, local, and quasi-governmental entities, as well as not-for-profit organizations, as a framework for an internal control system.
Reduced operational capability and a less-experienced workforce—coupled with a crowded and stressed jail system—jeopardize the safety and well-being of both inmates and staff and increase the jail’s liability exposure.

Effects of Crowding and Staffing Risks – According to the National Institute of Corrections, reduced operational capability and a less-experienced workforce—coupled with a crowded and stressed jail system—jeopardize the safety and well-being of both inmates and staff and increase the jail’s liability exposure.

Crowding means that properly housing and managing a diverse jail population becomes much more difficult. Compromises in a jail’s classification system occur, which are likely to lead to increases in violence, tension, and the availability of contraband. Basic functions—like security, maintenance, sanitation, programs, and recreation—begin to break down when they are stretched to their limits for extended periods of time due to crowding.\(^{21}\)

Although the Sheriff Department has limited incident data available for trend analysis due to changes in data management practices, our review of safety-related incidents identified that high-risk assaults—or those involving a risk of violence or physical harm—have increased slightly per month at both the Downtown Detention Center and the County Jail since January 1, 2017. Our analysis excludes low- and medium-risk assaults, such as those involving verbal threats or non-bodily fluids used in the event.

The shorter scope of available data limits both the department’s and the audit team’s ability to conclude on the strength of the trend and its causes. However, based on national research, this increase in incidents is consistent with the known effects of crowding and staffing risks described above. Appendix C describes these results and data limitations in further detail. Figure 8 on the following page presents this trend by month for both facilities from January 1, 2017, through July 31, 2018.

In addition, our review of workers’ compensation claims for the Sheriff Department indicate that, while all other claims have decreased, claims associated with workplace assaults have increased. Assault-related claims are also associated with a higher dollar cost to the City, as well as lost time and reduced operational capability for the department. Figure 9, also on the following page, presents workers’ compensation claims for assaults compared to all other claim types for January 1, 2016, through July 31, 2018.

Although jail administrators cannot fully control the risk factors impacting jail safety and security described above, they can design

FIGURE 8. High-Risk Assaults, by Facility

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects data on high-risk assaults from January 1, 2017, through July 31, 2018. This includes both inmate-on-inmate assaults and inmate-on-staff assaults. Limitations related to incident data resulted in a shorter scope of reliable and consistent data for analysis. The shorter scope length limits the degree to which the trends presented can be described. Appendix C provides additional information related to this analysis.

FIGURE 9. Workers’ Compensation Claims for Denver Sheriff Department

Source: Auditor’s Office analysis of Office of Risk Management data.

Note: This analysis reflects workers’ compensation claims data from January 1, 2016, through July 31, 2018.
and implement management practices and risk management strategies to effectively identify and mitigate risks to safety and security.

We examined the Sheriff Department’s management practices in the areas of direct supervision—including intake, classification, daily supervision, and incident response—as well as the department’s progress toward developing and implementing a risk management framework for its operations. We identified areas of weakness detailed below and make recommendations for improvement related to both management practices and risk management strategies.

As noted, the Sheriff Department has focused on implementing a direct supervision model for both inmate and jail management. We reviewed the department’s guidance and practices related to key stages and activities in its inmate management process for evidence of whether it aligned with leading practices in direct supervision and jail administration, as well as whether it complied with internal policies and procedures.

We identified issues with the Sheriff Department’s guidance and practices related to direct supervision—specifically initial intake and classification processes, daily supervision of inmates throughout the facilities, as well as the department’s protocols and practices for responding to incidents that threaten deputies’ control of inmates.

Insufficient Direct Supervision Practices May Be Adversely Impacting Jail Safety and Security

Intake and Classification Practices Are Insufficient to Support Safe and Secure Jail Operations

We identified several instances when the Sheriff Department’s intake and classification process deviated from leading corrections practices and department policies and procedures.

According to the National Institute of Corrections, the intake and classification process is key to managing risks throughout the entire jail operation, as inmate behaviors and characteristics are the primary source of risks to jail security. A secure jail must have a reliable means to identify and respond to the risks each inmate presents. Risk information should be collected at key decision points. These key decision points occur at intake during acceptance of custody, booking, and short-term-housing screenings; during classification for long-term housing determinations and program acceptance; and periodically throughout an inmate’s sentence through the reclassification process. The department’s deviation from both leading corrections practices and

department policies and procedures compromises its ability to identify risks at these key decision points.

Specifically, the audit team found instances when intake time frames exceeded leading practices, and we also found gaps between the Sheriff Department’s documented policies and its actual practices for inmate identification and initial classification interviews.

Regarding inmate classification, the Sheriff Department does not use a validated “objective classification system”—a system that determines prisoner custody level and program needs using a set of criteria that have been tested to demonstrate acceptable reliability and validity. The department also has not assessed its current classification system for overall effectiveness and appropriate use of overrides, as called for by the National Institute of Corrections.

Further, our analysis showed that the department’s override practices are not consistent with institute guidance or the department’s own policies and procedures. The department also has not complied with department reclassification policies and procedures to periodically reassess inmates’ levels of custody. These deviations have left the Sheriff Department vulnerable to increased risks to jail safety and security.

Intake Processes – For 300 bookings, the department completed the intake process in two or more calendar days—deviating from the leading practice. Guidance from the National Institute of Corrections indicates that intake processes—including verification of inmate identity and the completion of initial screening to identify security threats and necessary separations for short-term housing—should typically conclude within the first day of custody.23

<table>
<thead>
<tr>
<th>Calendar Days</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td>Same Day</td>
<td>Begin Jan. 1, End Jan. 1 – or up to 24 hours</td>
</tr>
<tr>
<td>1 Day</td>
<td>Begin Jan. 1, End Jan. 2 – or up to 48 hours</td>
</tr>
<tr>
<td>2 Days</td>
<td>Begin Jan. 1, End Jan. 3 – or up to 72 hours</td>
</tr>
<tr>
<td>3 Days</td>
<td>Begin Jan. 1, End Jan. 4 – or up to 96 hours</td>
</tr>
<tr>
<td>4 Days</td>
<td>Begin Jan. 1, End Jan. 5 – or up to 120 hours</td>
</tr>
<tr>
<td>5 Days</td>
<td>Begin Jan. 1, End Jan. 6 – or up to and exceeding 144 hours</td>
</tr>
</tbody>
</table>

The audit team learned from multiple Sheriff Department personnel who are familiar with the intake process that intake processing times routinely involve up to 15 hours for individuals being booked.

Our review of safety-related incidents indicated that 12 percent of incidents occur within the Downtown Detention Center’s intake area, making this a high-risk location regarding safety-related incidents. As a result, we reviewed intake records for 92,695 bookings that occurred on or between January 1, 2016, and July 31, 2018. Sheriff Department booking data revealed that the department completed the intake process within the first two calendar days of detention for almost all bookings.

Figure 10 illustrates the distribution of bookings by number of calendar days.

<table>
<thead>
<tr>
<th>Number of Days</th>
<th>Bookings</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greater than 5 Days</td>
<td>23</td>
</tr>
<tr>
<td>5 Days</td>
<td>1</td>
</tr>
<tr>
<td>4 Days</td>
<td>4</td>
</tr>
<tr>
<td>3 Days</td>
<td>23</td>
</tr>
<tr>
<td>2 Days</td>
<td>249</td>
</tr>
<tr>
<td>1 Day</td>
<td>25,731</td>
</tr>
<tr>
<td>Same Day</td>
<td>66,664</td>
</tr>
</tbody>
</table>

**Source:** Auditor’s Office analysis of Denver Sheriff Department data.

**Note:** This analysis reflects intake and booking data from January 1, 2016, through July 31, 2018. Data limitations and reliability issues may affect the accuracy of this analysis. For example, during the audit, the Sheriff Department was unable to provide hours and minutes associated with an intake assignment’s beginning and ending dates. Although the data system includes associated time-stamp fields, the data contained in them does not include time. Hours would have been a better measure than calendar days for the length of time in intake. For example, bookings that indicate next calendar day (“1 Day”) could have resulted from an inmate arriving late in the evening and total processing time could be as low as a few hours. Similarly, “same day” processing could represent anywhere between one and 24 hours. Sheriff Department data-entry errors and records management practices are a significant limitation on this data, particularly for bookings with more than one intake record. These records indicate significant outliers in the length of time spent in intake.

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24 We reviewed the population of intake records associated with bookings that occurred from January 1, 2016, through July 31, 2018, excluding records associated with seven inmate profiles the department identified as having data errors.
days for the time in our scope.

Sheriff Department officials stated that intake time frames can be driven by external factors, such as verifying identification or other required information provided through the Denver Police Department or the courts. Officials stated that decisions about housing assignments and releases cannot be made until an inmate’s identification has been verified and court documentation reconciled.

Additionally, auditors observed that deputies did not take photographs of scars, marks, and tattoos during intake, as required by department policies and procedures. National leading practices identify tattoos as a primary instrument for determining gang membership, along with self-reporting by inmates. Sheriff Department officials stated that these attributes are no longer photographed, because they said the department can confirm identification and gang affiliation through alternative means, such as other physical characteristics or inmate self-reporting. However, associated procedures had not been updated to reflect current practices. Moreover, relying on self-reporting has inherent weaknesses as inmates may have an incentive not to disclose gang affiliation for a variety of reasons.

Finally, we observed inmate interviews happening during the intake process, as opposed to during the classification process as outlined in policies and procedures. Because of this change in procedure, face-to-face interviews with inmates were no longer being conducted before deputy sheriffs made decisions on an inmate’s long-term housing assignment. While classification staff thought that two distinct interviews were important to gathering necessary information—both in intake prior to assignment to short-term housing and by classification staff prior to assignment to long-term housing—the department changed this process. Though this change was implemented, the department has not documented this process change in its policies and procedures.

Classification staff further asserted this change was based on the department’s interpretation of 2015 reform recommendations and a current shortage of classification staff. However, it is unclear whether this change conforms with the intent of the related reform recommendations.

Table 3 on the following page describes how the current interview process does not seem to accomplish the intended purpose of each recommendation. Our observations of combining both interviews in intake found the process was hurried and deputies were not taking time

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Classification Processes

As such, deputies may not always be gathering information on individual inmate risk factors necessary to make housing assignments that help ensure jail safety and security.

Recommendations from Hillard Heintze

| 3.16 – Interview Redundancies: | Revise County Jail policies to eliminate the redundancy of the primary classification interview and the subsequent proxy interview required at the County Jail. |
| This recommendation addresses the County Jail facility process rather than the Downtown Detention Center process. As inmates are initially processed through the Downtown Detention Center, classification interviews that occurred on transfer to the County Jail facility would be considered repetitive. |

| 3.17 – Structured Classification Interview: | Include in the classification process at the Downtown Detention Center a formal, structured and meaningful interview process that provides valuable information to the facility and aids in the inmates’ housing and programmatic decisions. It should identify the inmates’ needs, skills and interests and require the classification deputies to make recommendations regarding housing, work assignments and programs. |
| This recommendation calls for a meaningful interview process that adds value. As noted, our observations indicated that the combined process was not thorough. |

| 3.34 – In-Person Interviews: | Require classification deputies at the Downtown Detention Center and County Jail to conduct face-to-face interviews with inmates. Ensure the interviews include questions that allow deputies to document inmates’ needs and refer them to Department programs, either directly or by ensuring program staff actively recruits inmates to participate in programs. If the inmates’ needs have already been identified at the Downtown Detention Center, the County Jail could refer inmates to County Jail programs. |
| This recommendation calls for in-person interviews by classification deputies at both facilities unless an inmate’s needs have been previously identified by the Downtown Detention Center process. As noted, the interview conducted at intake is hurried and not thorough. |


Note: Hillard Heintze is a security risk firm that provides prevention-oriented advisory solutions to help improve performance and outcomes. The City contracted with the firm to assess Denver Sheriff Department’s jail operations.
to ensure they are appropriate to the jurisdiction’s jail population.\textsuperscript{26}

Additionally, department management does not review override practices for trends or to ensure overrides are appropriately used. National Institute of Corrections guidance on classification systems calls for continuous monitoring and evaluation of the objective classification system to ensure staff use it as intended.

We reviewed 161,328 classification decisions that occurred on or between January 1, 2016, and July 31, 2018, and identified 22,134 overrides (or 14 percent of these classification decisions).\textsuperscript{27} Our analysis of Sheriff Department classification data indicates that when the department overrode the system-generated classification score for these 22,134 assessments, classification deputies lowered the level of custody required for 17,546 of the override decisions, or about 79 percent of the time.

Figure 11 on the following page provides the distribution of override decisions as a percent of all classification decisions for January 1, 2016, through July 31, 2018. According to leading practices, overrides are appropriate for 5-15 percent of system-generated scores.\textsuperscript{28} As illustrated in the figure, the Sheriff Department falls within these guidelines, with total overrides representing 13-14 percent of classification decisions for the years reviewed.

However, leading practices also state that classification overrides should be, in general, evenly distributed—with 50 percent decreasing the classification determination and 50 percent increasing it. But with the Sheriff Department, overrides that decreased custody level account for 78-81 percent of the override decisions in each year reviewed, or as shown in the figure, between 10-11 percent of all classification decisions.


\textsuperscript{27} We reviewed the population of classification decisions made from January 1, 2016, through July 31, 2018, excluding records associated with seven inmate profiles that the department identified as having data errors.

According to department management, capacity issues and housing shortages result in the need to decrease custody levels for some inmates, thus driving these override practices.

We also reviewed the system notes for the justification of override decisions. For almost 17 percent of override decisions, deputies did not record the reason for the classification change in the jail management system. According to department policy, when a deputy makes the decision to override an inmate’s custody level, the deputy should make a notation in the jail management system explaining the circumstances necessitating the override. Three previous versions of the policy in our scope had the same requirement.

The absence of documentation justifying override decisions makes it difficult to pinpoint the degree to which these overrides stem from an
invalid classification system or other factors, such as housing shortages. Analysis of booking data also revealed that the Sheriff Department did not conduct automatic reclassifications as required by department policies and procedures and as recommended by leading practices.

We reviewed bookings that would have qualified for reclassification based on the inmate’s length of stay and custody level. For Levels 1 through 4, the Sheriff Department did not comply with its policy to reassess inmates. However, Level 5 inmates were subject to varying requirements during this time frame.

The current Sheriff Department policy for reclassification by custody level was effective January 1, 2018. This policy requires reassessment for Level 1 and Level 2 inmates every 30 days, for Level 3 and Level 4 inmates every 45 to 60 days, and Level 5 inmates every 60 days. Three previous versions of the policy in our scope had the same requirements with one exception. From January 1, 2016, through May 8, 2017, instead of automatic review every 60 days for Level 5 inmates, deputies exercised discretion in periodically reviewing their classification.

Table 4 presents the number of bookings associated with a non-compliant reclassification, along with the median length of stay associated with each booking.

The department relies on a manual review of all housing records to identify inmates who require reclassification. However, in 2008, when the Sheriff Department implemented the current jail management system, the department requested system features related to the reclassification process that were not delivered, including automatic calculations for reclassification dates and reporting that displayed a list

<table>
<thead>
<tr>
<th>Custody Level</th>
<th>Maximum Number of Days Allowed between Classification Reassessments</th>
<th>Number of Non-Compliant Bookings</th>
<th>Percent of Non-Compliant Bookings</th>
<th>Median Number of Days in Custody for a Non-Compliant Booking</th>
</tr>
</thead>
<tbody>
<tr>
<td>Levels 1 and 2</td>
<td>30 days</td>
<td>473</td>
<td>6.5%</td>
<td>206 days</td>
</tr>
<tr>
<td>Levels 3 and 4</td>
<td>45-60 days</td>
<td>2,567</td>
<td>24%</td>
<td>183 days</td>
</tr>
<tr>
<td>Level 5*</td>
<td>60 days</td>
<td>497</td>
<td>19.2%</td>
<td>147 days</td>
</tr>
</tbody>
</table>

*The maximum number of days allowed between classification reassessments for Level 5 inmates is now 60 days. Under a previous policy effective at the beginning of our audit scope, deputies exercised discretion related to the reassessment of Level 5 inmates.

**TABLE 4. Bookings Non-Compliant with Reclassification Policy**

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis includes booking and classification data from January 1, 2016, through July 31, 2018.
of inmates requiring reclassification. Department officials were unsure as to why the vendor did not sufficiently deliver these design elements in 2008.

Inadequate intake and classification processes can adversely impact jail safety and security. According to the National Institute of Corrections, intake processes are critical to identifying security threats. Further, classification errors can lead to serious incidents, including assaults on staff and inmates, which are extremely disruptive and costly to a facility’s operation and which expose the agency to expensive litigation.29, 30

Although the department’s incident trend data is limited by a short time frame, the increase in high-risk assaults at both facilities is also consistent with these nationally known effects of a compromised intake and classification system—in addition to the crowding and staffing risks previously discussed. Without effective intake and classification processes that conform to leading management practices and department policies and procedures, the Sheriff Department lacks the means to identify and appropriately respond to the risk that each inmate presents.

Department personnel cited several contributing factors for these deviations, including processes dependent on external factors—such as the Denver Police Department and courts system, lack of supervisory oversight, capacity and housing shortages, as well as data system design limitations. Although these factors certainly played a role in the development of each of these issues, a key cause of each has been the department’s fragmented approach to risk management. We discuss this further in our subsequent subfinding related to risk management, beginning on page 38.

The lack of holistic strategies for risk management contributes to a fundamental disconnect in the department’s understanding of how weaknesses in the design, implementation, and evaluation of intake and classification processes can create systemic risks to jail safety and security. Consequently, the Sheriff Department has not conducted a comprehensive review of its intake and classification processes to ensure alignment with leading management practices and department policies and procedures.

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RECOMMENDATION 1.1

Align Intake and Classification Processes with Leading Practices – The Denver Sheriff Department should align its intake and classification processes with leading practices, such as guidance from the National Institute of Corrections, and with department policies and procedures. This should include documentation of procedures not currently outlined in department policies and procedures, as well as appropriate risk control strategies related to external actors, management supervision, capacity and housing issues, and data system design.

Agency Response: Agree, Implementation Date – July 1, 2019 (Intake Policy Review), May 1, 2020 (Classification)

Direct Supervision Practices Are Inconsistent with Leading Practices and Sheriff Department Policies and Procedures

As stated in the Background section, the Denver Sheriff Department uses “direct supervision” principles to run the City’s jails—an approach that combines the physical design of the jail with strategies to manage inmate behavior to ensure safe and secure jail operations for inmates, staff, and visitors.31 To evaluate the Denver Sheriff Department’s implementation of direct supervision, the audit team reviewed department policies and procedures to determine if they were aligned with leading practices for select direct supervision principles.

Additionally, we conducted multiple observations at the department’s two jail facilities—including in booking areas, general population and restrictive housing areas, corridors, and control areas—to compare operational practices with department policies and procedures and with national leading practices. We identified high-risk areas for observation using the department’s safety-related incident data. Appendix C includes additional detail on these incidents by type, location, and risk.

In assessing the department’s implementation of direct supervision, we found that deputies were following leading practices in several areas by:

- Conducting rounds to interact with inmates in order to resolve issues and check the safety and security of housing areas,
- Completing periodic counts to ensure inmates were properly accounted for, and
- Managing and documenting inmate movement for routine daily activities, such as medical visits, recreation time, meals, and housing transfers.

However, we noted weaknesses that if not addressed could compromise the safety and security of the City’s jails. Those select practices that could be improved were related to the direct supervision principles of effective control, safety of staff and inmates, competent staff, and effective supervision.

**Effective Control and Safety of Staff and Inmates** – According to department policies and procedures, the use of restraints is intended to prevent violent or disruptive offenders from escaping, assaulting others, or committing some other offense. However, in our review of department policies and procedures and training-course content related to the use of restraints, we found that practices were not documented for identifying which inmates should be placed on restraint restrictions and for applying restraints on high-risk inmates, such as handcuffs.

For example, in our discussions with deputies, we found that their descriptions for the use of handcuffs on high-risk inmates were inconsistent. A deputy told auditors that a high-risk inmate in an intake holding cell was not restrained before being removed from his cell, because the inmate was acting as if he would be compliant with orders. We believe this may have contributed to an incident that immediately followed during which the deputy said he was assaulted by the inmate and two other deputies were also injured.

Additionally, while observing escorts and cell removals, we witnessed multiple deputies applying handcuffs to high-risk inmates only in front of the inmates’ bodies. In our review of restraint practices for other sheriff departments in Colorado and across the country, we noted these departments recommend that, whenever possible, inmates should be handcuffed behind their backs unless pregnant, disabled, elderly, or

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32 Denver Sheriff Department, Department Order 1.00.3014, Use of Restraints (December 22, 2017).
medically restricted to avoid potential injuries for inmates with medical considerations.\textsuperscript{33}

While we observed that deputies were trained to handcuff violent or disruptive inmates behind their backs in response to assaultive behavior or a failure to comply with jail rules, jail operations supervisors indicated that handcuffing in the front was a common practice in routine circumstances. This practice, without the aid of other restraints, does not help mitigate the risks associated with inmates' resisting deputies or with inmate aggression, such as striking or choking deputies or other inmates. These risks were evident during a separate incident that occurred during audit team observations, in which a high-risk inmate handcuffed in the front attempted to grab documents from a deputy's hand and displayed threatening physical behavior that led to a use-of-force incident.\textsuperscript{34} During the incident, the inmate was able to use the handcuffs to grasp a responding deputy’s wrist.

Lastly, at both jail facilities, we found that deputies were not conducting pat-searches as required to examine an inmate's clothing, pockets, hand-carried items, and shoes.\textsuperscript{35} Department policies and procedures require that deputies conduct a pat-search of inmates both as they leave and as they return to housing areas. However, we observed that inmates were not pat-searched by deputies as they were leaving or returning to general population housing units. We also noted that deputies assigned to work corridor posts at the Downtown Detention Center were not clear on their responsibilities to pat-search inmates. We observed some deputies conducting pat-searches that they asserted were required, although our review of procedures for corridor posts did not support that these searches were, in fact, required.

Although department policies and procedures allow for deputies to conduct searches at any time for security and management purposes, deputies not being well-versed in their responsibilities can lead to inconsistent understanding and application of required search procedures.\textsuperscript{36}

The National Institute of Corrections identifies pat-searches as the least-intrusive type of search that can be conducted, and the institute stresses that searches are beneficial for controlling contraband and detecting conditions that adversely affect security and the well-being

\textsuperscript{33} El Paso County, Colorado, Sheriff’s Office Policy Manual, Policy 301, Handcuffing and Restraints (July 11, 2018); King County, Washington, Sheriff’s Office General Orders Manual, 5.01.010, Handcuffing Suspects (October 16, 2018); and Los Angeles County, California, Sheriff’s Office, 5-05/115.00, Handcuffing Inmates (undated).

\textsuperscript{34} Appendix C includes more information on the department’s use of force.

\textsuperscript{35} Denver Sheriff Department, Department Order 1.00.1023, Searches (May 10, 2018); and Denver Sheriff Department, Procedure Manual 5.00.1065, Inmate Management (January 18, 2018).

\textsuperscript{36} Denver Sheriff Department, Procedure Manual 5.00.1065, Inmate Management (January 18, 2018).
of staff and inmates. As such, department management should monitor operations to ensure deputies understand their responsibilities and are completing searches as required.

**Competent Staff** – Through our review of department policies and procedures and observations of various department training, we found that the department’s training practices, except for on-the-job training, were generally consistent with national leading practices for providing entry-level training to new staff and with ongoing training to existing staff.

According to the National Institute of Corrections, on-the-job training should be a formal teaching process with specific performance objectives and a list of steps for successful completion of training. However, we found that policies and procedures for the Field Training Officer Program—which provides on-the-job training to new deputies upon their initial assignment to jail facilities—did not have a formal and consistent approach for training on jail operations or documenting deputy proficiency for post assignments.

Specifically, we found program coordinators at each jail facility had developed their own individual training procedures that were inconsistent between facilities, and informal training documentation did not always include necessary information—such as posts that deputies should be assigned to, time frames and frequency that deputies should be assigned to posts, or forms to evaluate deputy performance at specific posts.

**Effective Supervision** – Collective national experience in a jail or corrections environment has identified that one deputy can effectively supervise up to 72 inmates, if necessary. Any number of variables can affect the number of inmates a deputy can effectively supervise, such as inmate classification, housing unit design, and types of activities within a housing unit. In our review of the department’s staffing practices, we found that informal staffing guidance had been implemented for the Downtown Detention Center—in alignment with national leading practices—to assign an additional deputy when a housing unit exceeded 70 inmates and again when it exceeded 90 inmates.

In our review of the department’s staffing practices, we found that informal staffing guidance had been implemented for the Downtown Detention Center in alignment with national leading practices.

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However, contrary to department procedures requiring written directives, these practices have been in place for over two years based only on an email correspondence. National leading practices identify written policies and procedures as a formal mechanism for communicating responsibility to staff; therefore, the department should ensure these staffing practices are documented in policies and procedures.⁴⁰

**RECOMMENDATION 1.2**

Align Direct Supervision Policies and Procedures with Leading Practices – The Denver Sheriff Department should align its policies and procedures to ensure its direct supervision practices to conform with leading practices, such as guidance from the National Institute of Corrections, including those leading practices related to inmate restraint practices and field training. Additionally, the department should implement necessary monitoring activities to ensure direct supervision practices and department policies are adhered to.

Agency Response: Disagree, Implementation Date – October 1, 2019

Incident Response Process Lacks Coordination

Our review of the Sheriff Department’s safety-related incident data found that deputies responded to an average of about five unique incidents per day related to assaults, sexual assault, or uses of force. Between January 1, 2017, and July 31, 2018, the Sheriff Department reported roughly 3,051 unique safety-related incident reports for a total of 3,585 incident types. Figure 12 on the following page illustrates the frequency of unique incident reports by day during that time frame.

As discussed in the Background section, the Sheriff Department relies on the National Incident Management System to guide critical incident response within its jail facilities. The National Incident Management System is a comprehensive, systematic, and proactive approach to incident management, including the command and coordination of incidents, resource management, and information management. This system is designed to prevent, protect against, mitigate, respond to, and recover from incidents.⁴¹

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Within the National Incident Management System, a component called the “Incident Command System” is recommended for managing incidents. The Sheriff Department identified the Incident Command System—which is a standardized approach to the command, control, and coordination of on-scene incident management—as an integral tool that can be used for any type or size of emergency, from critical incidents to minor situations.\(^{42}\)

The department has incorporated the Incident Command System into its policies and procedures. The National Institute of Corrections has stated that, although this system is generically appropriate for large-scale incidents that require interagency responses, it has limitations for application in small-scale incidents at the individual facility level. Therefore, in 2008, national leading practices for incident management in corrections—called the “Incident Command System for Corrections”—were refined to create a system that is suitable for use in any corrections organization.\(^{43}\)

The audit team’s review of both these leading practices and the training provided by the National Institute of Corrections identified

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\(^{42}\) Denver Sheriff Department, Department Order 1.00.3004, Disturbances, Emergencies, and Critical Incidents (February 2018).

information that may help the department in addressing those weaknesses we found in the governance of incident management.

To assess the department’s incident response processes, the audit team reviewed department policies and procedures for comparison to Incident Command System guidance and other national leading practices for emergency and incident response. Additionally, we conducted observations in the department’s jail facilities in areas selected based on historical incident data.

In our evaluation of these processes, we found fragmented and unclear guidance across 20 different policies and procedures dealing with incident-response processes for decision-making, communication, and resource management as shown in Figure 13.

**FIGURE 13.** Select Denver Sheriff Department Incident Response Policies

<table>
<thead>
<tr>
<th>Department Orders (4)</th>
<th></th>
<th></th>
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</thead>
<tbody>
<tr>
<td></td>
<td>Disturbances, Emergencies, and Critical Incidents (1.00.3004)</td>
<td></td>
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<tr>
<td></td>
<td>Reporting System (1.00.11004)</td>
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<td></td>
<td>Radio Communication (1.00.9005)</td>
<td></td>
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<tr>
<td></td>
<td>Specialty Units and Specialty Pay (1.00.2024)</td>
<td></td>
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<tr>
<td>Trans-Divisional Orders (1)</td>
<td>Sergeant (1.00.5024)</td>
<td></td>
</tr>
<tr>
<td>Post Orders and Procedure Manuals (17)</td>
<td>Watch Commander (1.00.5025)</td>
<td></td>
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<tr>
<td></td>
<td>Building 1 (5.20.1035)</td>
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<tr>
<td></td>
<td>Building 4 (5.20.1036)</td>
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<tr>
<td></td>
<td>Building 20 and RISE Program (5.20.1037)</td>
<td></td>
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<tr>
<td></td>
<td>Building 20 Escort Officer (5.20.1038)</td>
<td></td>
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<tr>
<td></td>
<td>Building 21 Post Order (5.20.1040)</td>
<td></td>
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<tr>
<td></td>
<td>Building 22 (5.20.1041)</td>
<td></td>
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<tr>
<td></td>
<td>County Jail Building 20 Emergency Response (5.20.3033)</td>
<td></td>
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<tr>
<td></td>
<td>Building 20 Post 1 (5.20.3035)</td>
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<tr>
<td></td>
<td>County Jail Corridor Officer (5.20.3036)</td>
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<td></td>
<td>Main Control (5.20.3038)</td>
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<td></td>
<td>Housing (5.21.1054)</td>
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<td></td>
<td>Central Control (5.21.3042)</td>
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<td></td>
<td>Control Center (5.21.3043)</td>
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<td></td>
<td>Corridor Officer (5.21.3044)</td>
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<td></td>
<td>Custodial Management (5.00.3048)</td>
<td></td>
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<tr>
<td></td>
<td>Emergency Response Unit (5.24.5042)</td>
<td></td>
</tr>
</tbody>
</table>

**Source:** Auditor’s Office analysis of Denver Sheriff Department information.

**Note:** This list is not all-inclusive and identifies only the documents reviewed by the audit team.
Our review also determined that policies and procedures did not clearly identify or define incidents, did not always include incident response expectations for first responders, and did not always address expectations for staff who are not involved in incident response, so that they can help maintain safety and security in unaffected areas of the jail facilities.

First, we found that department policies and procedures did not clearly define incidents, such as providing examples of each incident type. Our examination of department policies and procedures found that the same type of serious event was identified as a “critical incident,” a “significant incident,” a “major disturbance,” or a “Type 1” or “Type 2” incident. Additionally, less serious events were simultaneously documented as “emergencies,” “disturbances,” “non-critical incidents,” or “Type 3,” “Type 4,” or “Type 5” incidents. Furthermore, we found that events that most often occur in the department’s facilities—such as fights, assaults, or minor medical emergencies—were not linked to a specific incident type to help staff understand the scope of these incidents and the responses they may require.

Next, based on our observations in both the Downtown Detention Center and the County Jail, we reviewed policies and procedures for those staff who responded to several incidents. We found that policies and procedures did not always include responsibilities for initial responders, such as housing deputies, corridor deputies, and supervisors. In our review of housing deputy and supervisor post orders, we found they did not always include processes for identifying the location and nature of incidents, for managing responding staff to help contain incidents, and for communicating the resolution of incidents. While we noted some of these items addressed in custodial management and control center procedures, staff may not be aware of these requirements due to the many policies and procedures containing incident response guidance.

Regarding the corridor deputy post order, we also found similar procedure omissions related to incident responsibilities for this position. Additionally, while we identified that corridor deputies and additional deputies assigned to housing areas were expected to respond to incidents, procedures did not prescribe that one deputy should remain at these posts to maintain supervision in the unaffected area.

The department indicated that due to the varying nature and severity of incidents, they rely on training to help staff think critically about responding to incidents within the parameters outlined in policies and procedures. However, in our observation of in-service training in September 2018, we noted that one of the courses was designed to discuss emergency and incident response due to concerns identified by
These deputies voiced concerns that incidents were responded to in an inconsistent manner, which caused undue security concerns.

jail facility staff. During this course, deputies identified specific concerns with communication among responding staff and direction given to responding staff during incidents; these deputies voiced concerns that incidents were responded to in an inconsistent manner, which caused undue security concerns.

Along with training, written policies and procedures are identified by the National Institute of Corrections as an element of an effective safety program. Additionally, the institute recommends that the types of emergencies that can occur in jails should be identified and that clear processes for decision-making and resource deployment should help contain incidents and mitigate harm to inmates, staff, and property.  

Without coordinated responses to incidents, the department is not able to demonstrate it has an effective approach in managing risks to safe and secure jail operations.

**RECOMMENDATION 1.3**

**Develop, Document, and Implement Cohesive Incident Response Strategies** – To ensure department staff respond to incidents in a manner that mitigates risk to jail safety and security, the Denver Sheriff Department should develop, document, and adhere to cohesive incident response strategies. This should include aligning its existing incident response policies and procedures to conform with leading practices, such as guidance from the National Institute of Corrections, and cohesive strategies for decision-making, communication, and resource management for incident responders.

**Agency Response: Agree, Implementation Date – October 1, 2019**

**The Sheriff Department Lacks Effective Risk and Data Management Strategies for the City’s Jails**

Part of ensuring the safe and secure operation of jail facilities is having effective strategies for risk management and, within that, sound data management. The Sheriff Department is lacking in both these areas, which compromises the department’s ability to identify and respond to risks posed by the inmates it manages.

As mentioned, “enterprise risk management” is a decision-making tool that allows leadership to understand an organization’s exposure to risk and understand how identified risks can adversely impact an organization’s success. Specifically, enterprise risk management is a comprehensive process that helps managers understand risk.

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interactions throughout an organization, including how one risk can augment or offset another.

Risk management also helps leadership understand the interaction between efforts to address or mitigate risks—such as how the treatment of a risk in one part of an organization can create a new risk elsewhere or can affect the effectiveness of efforts to address other risks. As part of an organization’s overall governance and accountability structure, enterprise risk management should include all areas in which an organization could be exposed, including risks to organizational goals and strategies, finances, operations, and reputation.45

Furthermore, enterprise risk management necessitates the use of sound performance information to detect changes that could adversely impact an organization’s administration or operations and to determine whether risk-mitigation strategies are adequately addressing the risks identified.46 The importance of performance information highlights the need for robust data management processes to organize and maintain data—including processes for collecting, validating, storing, protecting, and processing data to ensure the data are accessible, reliable, and available to use in a timely manner for management decisions.

We found the Denver Sheriff Department does not have a comprehensive risk management strategy, and its data management practices are inefficient and not maximized to help the department in its decision-making. To address these concerns, we offer several recommendations to help the department develop a comprehensive approach to risk management, improve its understanding of the risks it faces, and better utilize the data its specialized units gather and analyze with the purpose of aiding department decision-making.

The Sheriff Department Lacks Comprehensive Risk Management Processes

The National Institute of Corrections identifies seven key leading practices to help jail administrators understand risks to jail operations through the development of a formal program that supports a structured approach to assessing risks, implementing strategies to manage risks, and evaluating the effectiveness of those strategies on an ongoing basis. Specific leading practices identified include:

- Demonstrated leadership support of organization risk management efforts;
- Systematic and consistent processes for incorporating risk management into jail activities and planning;
- Assigning responsibilities and accountability for implementing risk management efforts;
- Promoting a culture of risk management through stakeholder involvement;
- Using information to improve the allocation of resources;
- Establishing goals and performance measures to demonstrate the success of risk management efforts; and
- Providing guidance and information to staff and other stakeholders.

The Sheriff Department has taken some steps, through multiple discrete activities, to understand and manage risks to jail operations. For example, the Sheriff Department maintains a policy risk matrix, which department leadership say they rely on to identify training and reinforcement opportunities to ensure that staff perform in accordance with department policies and procedures. Officials stated that the risks identified are based on the experiences of leadership staff. Further, in 2017, the Sheriff Department assessed the department’s physical facilities for vulnerabilities to identify risks and to make recommendations to reduce inmate escapes and other risk factors that could compromise jail safety and security.

In addition to the policy risk matrix and vulnerability assessment, the Sheriff Department in 2018 created the Assessment and Inspections Unit, Performance Management and Improvement Team, and Grievance and Incident Response Team. Sheriff Department officials highlight the establishment of these groups as being foundational components of the department’s efforts to understand risks to jail administration and operation.

• **Assessment and Inspections Unit** – The Assessment and Inspections Unit is responsible for systematically evaluating and making recommendations to improve the effectiveness of department administration and operations through inspections and assessments. Officials state that the unit is developing a process that will enable Sheriff Department leadership to identify risks that could disrupt operations, lead to bodily injury or death, or adversely impact the department’s finances or reputation. Department officials stated that this work remains under development and estimate it will take at least one year to complete due to the large scale of the effort.

• **Performance Management and Improvement Team** – The Performance Management and Improvement Team is a collaborative effort between leadership and the Data Science Unit to help the department be more data-driven in its decision-making. Officials state that this team considers risk when establishing performance goals. Officials also believe regular reporting and discussion of performance measures during team meetings helps the department understand risks to its administration and operations.

• **Grievance and Incident Response Team** – The Grievance and Incident Response Team is responsible for improving the department’s efforts to manage the inmate grievance and inmate discipline processes. Officials stated that the department leverages information obtained through the team groups to understand incident response—including those involving the use of force—and to support decisions about training opportunities or strategies for mitigating risks to jail operations.

While Sheriff Department leadership has taken some steps to understand and manage risks to jail operations, department officials acknowledge that the department has neither developed nor documented a comprehensive risk management process.

Despite these efforts, the Sheriff Department’s existing risk management approaches do not align in several areas with leading practices from the National Institute of Corrections:

• **Lack of Systematic and Consistent Risk Management Processes** – Leading practices state that the risk management process should be a systematic and consistent process that incorporates risk management into a jail’s activities and planning processes. Additionally, leading practices stipulate that risk management processes should be documented in writing to provide the structure for directing implementation, establishing accountability, monitoring progress, making required changes, and reporting to the jail administrator and the funding authority.

While Sheriff Department leadership has taken some steps to understand and manage risks to jail operations, department officials acknowledge that the department

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has neither developed nor documented a comprehensive risk management process. The department has also not integrated its current processes in a manner that would enable the department to systematically and consistently identify, assess, and mitigate risks across the department—including those related to jail safety and security. Rather, individual risk management procedures are documented in individual facility and function-specific policies.

Without a comprehensive, well-documented risk management process, the Sheriff Department does not have a defined approach to identify existing and potential risk, to assess the likely effect of risk on the jail, to establish risk mitigation strategies, to understand the interaction between the risks and mitigation strategies, and to leverage the information obtained to improve the allocation of resources.

Moreover, the lack of comprehensive, well-documented risk management strategies makes it difficult to determine the extent of senior-level commitment to risk management and prevents the department from having the structure required to direct implementation, establish accountability, monitor progress, make required changes, and report to the Sheriff and other department leadership, jail staff, and other stakeholders in a timely manner.

- **Lack of Centralized Risk Management Coordination** – Leading practices state that risk management processes should clearly assign responsibility and accountability for risk management—including the centralized coordination of risk management efforts. However, the Sheriff Department has not centralized the coordination of its risk management activities. In fact, the department’s Director of Security position—a critical position for managing risks across jail operations—has been vacant since early April 2018.

  The lack of centralized risk management coordination hampers the department’s ability to ensure risk management processes are consistent and to work toward a common goal. It also increases the likelihood of risk “silos” that could result in disjointed communication and actions that are at cross-purposes.

- **Unclear Level of Stakeholder Engagement** – Leading practices state that the risk management process should promote stakeholder engagement. Though the Sheriff Department’s existing processes for understanding and managing risk reflect participation from the department’s leadership, the lack of a comprehensive, well-documented risk management process makes it difficult to determine the extent to which other stakeholders (e.g., jail staff, supervisors, volunteers, and inmates)
contribute to the department’s understanding of how risk affects jail operations.

- **Unclear Alignment between Risk Management Processes with Resource Allocation** – Leading management practices state that an organization should leverage information obtained through its risk management process to improve resource allocation and preserve or enhance assets that are important to a jail’s ability to accomplish its mission and goals. Sheriff Department officials cited several efforts that support the department’s resource allocation decisions—such as performance management meetings, strategic planning efforts, and staffing meetings. However, the lack of a comprehensive risk management process means that the department has not developed mechanisms for systematically leveraging its risk management activities to inform decisions about its allocation of resources.

- **Lack of Goals or Performance Measures to Evaluate Risk** – Leading practices state that organizations should establish goals and performance indicators to measure the existence and prevalence of risk, as well as the success of risk mitigation strategies. Sheriff Department officials acknowledge that while the department has attempted to collect and analyze data through the department’s Data Science Unit, the department has not developed goals or measures to assess risk as part of a comprehensive risk management process.

In addition to the leading practices established by the National Institute of Corrections, the Sheriff Department does not align with other leading practices for risk management:

- **No Comprehensive List of Risk to Department Operations** – Leading practices for risk management from the U.S. Government Accountability Office state that organizations should assemble a comprehensive list of risks—both threats and opportunities—that could affect the organization’s ability to achieve its defined goals and objectives. Sheriff Department officials acknowledge that the department has not assembled a comprehensive list of risks. Officials state the department plans to develop a comprehensive list as part of the Assessment and Inspections Unit’s risk analysis, as previously discussed.

- **Fragmented Communication and Reporting of Risks** – Federal leading practices for risk management also state that organizations should communicate or share risk information with
stakeholders and incorporate feedback to identify and better manage risks and increase transparency and accountability. Though Sheriff Department officials state that the department communicates risks to its stakeholders through multiple means—including notifications of policy changes, quarterly supervisor training, memoranda, and email—the department has not developed a cohesive and comprehensive approach for sharing risk information and incorporating feedback from internal and external stakeholders.50

RECOMMENDATION 1.4

Develop, Document, and Implement Comprehensive Risk Management Strategies – The Denver Sheriff Department should develop, document, and adhere to a comprehensive set of risk management strategies that identifies systematic and consistent approaches for incorporating risk management into jail operations and planning processes. Specifically, the strategies should identify and describe strategies for detecting existing and potential risk, assessing the likely effect of risk on jail operations, and establishing risk control measures. Moreover, the comprehensive strategies should clearly define the structure required for directing implementation—including centralized coordination, establishing accountability, monitoring progress, making required changes, and reporting in a timely manner to the jail administrator and the funding authority.

Agency Response: Disagree, Implementation Date – October 1, 2019

Inadequate Data Management Practices Weaken Sheriff Department Efforts to Manage Risk

As part of its reform efforts, the Sheriff Department has taken several steps toward strengthening its data management practices.51 For example, the Sheriff Department created the Data Science Unit to improve the department’s data analytics capabilities and move toward data-driven decision-making, and the department created the Assessment and Inspections Unit to develop a continuous process improvement and internal audit function.


51 We use the term “data management” to generally refer to the administrative processes an organization uses to organize and maintain data. This includes processes for acquiring, validating, storing, protecting, and processing data to ensure it is accessible, reliable, and available to users in a timely manner.
Additionally, the department plans to complete the procurement and implementation of a new jail management system in late 2019. The department allocated $1.4 million for the new system for fiscal year 2019. According to the National Institute of Corrections, good management requires good information and data. The institute offers strategies to assist jail administrators with identifying data critical to jail operations, collecting and coding this data, analyzing and interpreting results, and communicating these results to stakeholders for decision-making.  

To determine the extent to which existing data on jail administration and operations is accurate and complete, auditors assessed the reliability of data obtained from the Sheriff Department’s information systems—including evaluating the effectiveness of systems controls and directly testing the data. Auditors found that poor data management practices continue to present challenges related to producing accurate and complete information to support decision-making.  

While the department has taken commendable steps toward improving data management, gaps in fundamental practices continue to exist. Specifically, the department has not fully developed cohesive or comprehensive strategies for:

- Consistent data collection and coding—including ensuring that its data system and staff are equipped to collect and report reliable data;
- Analyzing and interpreting the data collected—including leveraging existing units to understand relationships and interdependencies between the data elements collected; and
- Communicating the results of analyses to relevant stakeholders for decision-making.

Furthermore, as noted, the Sheriff Department has not developed a comprehensive set of key risk indicators to measure risk prevalence and the success of risk management strategies. As a result, the Sheriff Department does not have the accurate or complete data necessary to fully understand its operations—including risks related to safe and secure operations.

The Sheriff Department does not have the accurate or complete data necessary to fully understand its operations—including risks related to safe and secure operations.

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Data-driven decision-making includes collecting the appropriate data, making sense of that data by assessing the quality of data and transforming it through meaningful analysis into useful knowledge, as well as applying this knowledge to jail decisions.

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to fully understand its operations—including risks related to safe and secure operations.

**Data Collection and Coding** – Data collection and coding relates to how information is captured and recorded in a data system. Leading practices in data management state “garbage in, garbage out”—meaning that poor-quality data leads to misleading and erroneous analysis and ultimately poor management decisions. As a result, managers should take steps to ensure data collection and coding processes reduce the risk that users will enter inaccurate and inconsistent data. Strategies to reduce this risk include:

- Ensuring that staff responsible for collection and coding have the right skills and are trained;
- Designing data collection instruments to reduce the room for error through better input controls; and
- Providing data-entry guidance, such as data dictionaries and code books.\(^53\)

The audit team’s data reliability tests identified inconsistent data entry by deputies of classification scores, incident time and location, and inmate demographic information. In addition, the audit team reviewed jail management system records associated with workers’ compensation claims data from the City’s Office of Risk Management and records from Denver Health related to inmate medical care for assaults. Our review identified inconsistent practices in the types of jail management system records and the level and location of detail provided for the incidents.

Because of the number of different users, a lack of input controls, and unclear policies and training gaps, deputy data-entry practices continue to be inconsistent. The jail management system interfaces with other data systems—such as those of the Denver Police Department and the Denver County Court—to auto-populate some data related to arrest charges, demographics, criminal history, and court appearances.

Some 800 deputies across different units are responsible for creating much of the operational data in the system related to intake, records, classification, housing, and incidents. Because the jail management system lacks input controls for key fields, these 800-plus deputies create varying entries in the system. In addition, deputies cited confusion over reporting requirements in the jail management system and resulting administrative burdens, as well as gaps in training related to reporting and use of the jail management system.

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These data-entry practices by deputies, as well as limitations within the jail management system, necessitate a manual review of records to accurately identify key operational data for the department. For example, our review of safety-related incidents showed that deputies used at least 11 different jail management system report types to record incidents involving use of force and 10 different jail management system report types to record incidents involving assaults.

As a result, Data Science Unit analysts manually review all incident reports daily to create data on safety-related incidents. Their review includes standardizing, or “cleaning,” data elements entered by deputies and coding data. Data Science Unit analysts have started a data dictionary for common fields in the jail management system, but this document does not address all fields. Similarly, there is little documentation for how the analysts code collected fields. Audit team data reliability tests identified inconsistent coding by Data Science Unit analysts for elements such as type of assault, reason for force, demographic information, and booking dates. In addition, the unit does not have a review process to ensure the consistency and completeness of its analysts’ data collection.

According to the analysts, because there are only one or two analysts involved in coding each of the data sets, code books are not necessary. However, the primary analyst for assaults and uses of force recently retired, and as this process relied heavily on that individual’s expertise, documentation of coding protocols is key for institutional memory.

Accessibility of information is also a significant limitation of the current system. First, the system is not designed to collect data elements that the department deems critical in a format that allows for reporting—such as the safety-related incidents manually collected by the Data Science Unit. As a result, deputies inconsistently capture some data elements in narrative text boxes that do not allow for easy or consistent reporting by the Data Science Unit.

Second, to identify trends in population growth, demographics, classification, and housing assignments, the audit team worked with the Data Science Unit to create new queries that resulted in multiple data sets requiring significant restructuring for analysis. The Data Science Unit routinely creates custom queries like these to generate data sets at
management’s request when system reports for such data do not exist. Further, when the audit team attempted to review historical records for inmates, including prior bookings, we identified a system limitation regarding the jail management system’s ability to search for and provide access to historical records. Search functions by name or inmate identification number returned results only for the inmate’s current booking. Using functions to search for prior booking numbers and changing the booking number parameters for this search returned only one type of report.

As noted, deputies report incidents under several different jail management system report types. The department’s administrator for the jail management system had to modify a query to pull all incident numbers associated with our sample of inmate identification numbers. Essentially, this means that an individual must first know that incidents exist for an inmate and know an incident’s unique identifier before being able to find the narrative in the system for prior bookings. As a search function, this provides exceptionally limited value and requires significant workarounds to access information.

It should be noted that the Sheriff Department’s 2008 contract for the implementation of its current data system identified several features and capabilities in the statement of work related to the system and data limitations encountered by the audit team. According to department officials, in some cases, the vendor did not sufficiently deliver on these design elements, while in others, the Sheriff Department has not leveraged available design elements in their operational processes.

For example, the contract called for:

- “Rigid controls” to prevent invalid data entry;
- The ability to access complete historical records for previous bookings;
- A search capability for complete incident history, including cross-references by name to access all incidents an individual was involved in; and
- Reporting functions that are “comprehensive and exhaustive,” including “ad hoc reporting that is easy to use, menu-driven, and does not require programming assistance to use.”

Additionally, the statement of work provided for the collection of data elements that were not available, according to department personnel. These data elements included extensive electronic inmate medical records for care provided both in and out of the jail facility, automatic
date calculation and display of inmates requiring reclassification assessments, and detailed sentencing information.

Analyzing and Interpreting Results – Analyzing and interpreting the data collected refers to understanding and explaining what the information means in the context in which it was collected. In other words, this means going beyond simple counts and percentages to understand relationships and dependencies between data elements and the processes they represent.

The Data Science Unit was created to improve the department’s data analytics capabilities. Based on discussions with analysts, it appears the Sheriff Department relies on the Data Science Unit primarily for “data cleaning,” as opposed to leveraging the unit as a resource for more meaningful analyses. Further, the unit primarily responds to managerial requests for information, rather than acting as a partner to help managers identify relevant data elements and understand how these elements inform their work processes. Data Science Unit analysts spend the bulk of their time as data-entry clerks with subjective, manual review processes or they spend their time crafting system queries as reporting workarounds to create data sets. In addition, staffing and technology resources also limit the unit’s ability to create a robust review process to ensure the quality and consistency of collected information.

Furthermore, the Assessment and Inspections Unit—created in response to reform recommendations as a means of continuous improvement—is intended to use data, review records, and work with department personnel to assess the effectiveness of department practices throughout the organization. The Sheriff Department should also leverage this unit’s work to further its understanding of relationships and dependencies within programmatic contexts. The department identified the unit as a significant component of its risk and performance management strategies.

As the unit is still under development, it is critical that the Sheriff Department, at this early stage, promote and enforce this unit’s work and recommendations throughout all levels of management.

Communicating Results for Decision-Making – Results should be shared with stakeholders in a format that allows them to easily understand and use the data. According to National Institute of Corrections guidance, the true test of good analysis is if the data can be understood and used by management to solve problems or make decisions. The Data Science Unit uploads the data it collects to a dashboard software,

which allows individual users to interact with the data and summarize them by different attributes.

Although the unit maintains an inventory of which users have been granted access to the dashboard, analysts do not have a formal mechanism to track how agency management analyzes or uses this information. Their general understanding is agency management does use the information to some extent, based on the questions and emails they receive from leadership.

Department management stated that they report information they receive from the Data Science Unit in weekly executive management meetings and the Sheriff tasks individuals with corrective action based on data results and findings. However, when requested by the audit team, the department could not produce documentation to support this communication or subsequent corrective actions and use of data in decision-making. As a result, the audit team could not verify the extent to which results are communicated to management or incorporated in decision-making.

Sheriff Department management stated that the department has purposefully avoided formalizing or documenting its performance management program to foster a more conducive culture for innovation, in which it is safe to fail as it undertakes reform efforts. However, this reporting practice does not allow for transparency and accountability related to which members of management are aware of and responsible for issues identified through analysis.

**New Data System Presents Opportunity for Improvement** – These data-quality issues continue to exist for multiple reasons, including the volume of users creating data in the system, a lack of training coupled with unclear policies, and data system limitations. According to Sheriff Department management, the department has prioritized building the infrastructure for sound data management practices under its reform efforts and anticipates significant improvement with the implementation of the new jail management data system in late 2019.

The procurement of a new jail management system does present an opportunity for the Sheriff Department to improve its data management processes; however, it is key that the agency learn from the system limitations and challenges with its current system to avoid the same pitfalls with the new system.

The National Institute of Corrections offers guidance to jail administrators on data system implementation, which addresses pre-implementation planning, design, implementation, and post-implementation. Design phases should involve a broad base of stakeholders, including front-line staff using the system. Implementation phases should include

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**It is key that the Sheriff Department learn from the system limitations and challenges with its current system to avoid the same pitfalls with the new system.**
extensive user-testing by front-line staff to ensure the system supports jail operations and builds user competence through skill development and training. Post-implementation includes monitoring to identify implementation issues and a feedback loop to incorporate solutions into the system design.\textsuperscript{55}

Considering this guidance and the challenges with its current system, the Sheriff Department should focus on user experience in the design of its new system. The department must ensure that deputies creating operational data are properly trained to use the system and that the system offers them a straightforward, intuitive experience that reduces administrative burdens rather than exacerbates them. In addition, department management should ensure the system design collects all data elements the department deems critical to its operations. As it refines reporting needs, the Sheriff Department should also streamline reporting processes in the system to increase the accessibility of key data points.

By improving these fundamental practices, the Sheriff Department could then leverage the analysts in the Data Science Unit to conduct more meaningful analyses, rather than using this resource on cleaning and creating data. In turn, staff in the Assessment and Inspections Unit, as well as department management, would have more and better data on which to base assessments and decisions.

Finally, another key lesson from the department’s current system involves the importance of contract monitoring. Management plays a critical role in planning for and overseeing system implementation. According to National Institute of Corrections guidance, inadequate or ineffective implementation skills in management can waste resources, fail to achieve the benefits of a new or improved system, and, in some cases, result in the abandonment of the system, with substantial loss of time and financial resources. Furthermore, the software may be erroneously perceived as ineffective if management did not ensure the software was implemented effectively, that users achieved competency, or that it maintained fidelity to the original design.\textsuperscript{56}

As noted, regarding the current system, the Sheriff Department failed to ensure that its vendor delivered all promised system features, and the department did not fully leverage other features in its day-to-day operations. As a result, it is critical for the Sheriff Department to


monitor and evaluate the implementation of the new system to ensure its current vendor delivers all critical design elements and that these elements are incorporated in its operations.

**RECOMMENDATION 1.5**

**Develop and Implement Data Management Plan** – The Denver Sheriff Department should develop and adhere to a cohesive, comprehensive data management plan to include strategies and processes for improving the following:

- Collecting and coding of data—including ensuring the department’s data system and staff are equipped to collect and report reliable data;
- Analyzing and interpreting the data collected—including leveraging existing units to understand relationships and dependencies between the data elements collected and the risks to jail safety and security; and
- Communicating the results of analyses to stakeholders for decision-making—including developing mechanisms to ensure objective, easily understood reports are communicated in a transparent and accountable manner throughout the organization.

**Agency Response: Agree, Implementation Date – December 31, 2019**

**RECOMMENDATION 1.6**

**Develop, Document, and Implement Monitoring and Evaluation Strategies for New Jail Management System** – In addition to Recommendation 1.5, the Denver Sheriff Department’s data management approach should provide for monitoring and evaluation of the new jail management system’s implementation to ensure all critical system design elements are delivered by its vendor and incorporated in its operations.

**Agency Response: Agree, Implementation Date – December 31, 2019**
RECOMMENDATIONS

1.1 Align Intake and Classification Processes with Leading Practices – The Denver Sheriff Department should align its intake and classification processes with leading practices, such as guidance from the National Institute of Corrections, and with department policies and procedures. This should include documentation of procedures not currently outlined in department policies and procedures, as well as appropriate risk control strategies related to external actors, management supervision, capacity and housing issues, and data system design.

Agency Response: Agree, Implementation Date – July 1, 2019 (Intake Policy Review), May 1, 2020 (Classification)

Agency Narrative: The Denver Sheriff Department agrees that classification and intake procedures should align with leading practices. The Sheriff Department has already taken steps to verify current practices are adequate and will take further measures to ensure the same going forward.

To ensure classification practices meet national leading practices, the Sheriff Department manages an ongoing cycle of past, present, and future studies of the classification process to identify opportunities for improvement. Current classification and housing practices were reviewed in 2015 through a technical assistance project with the National Institute of Corrections. Recommendations from that review have been integrated into DSD practices. As part of this continuous effort to ensure our classification system aligns with leading practices, the Sheriff Department began a comprehensive review of classification practices in 2018 to determine whether the department should adapt a new classification system. Based on that review, the DSD will switch to the decision tree classification system integrated into the new jail management system when the DSD implements its new jail management system, ATIMS 2.0. The DSD will address the concerns on validation raised by the City Auditor by conducting an external assessment of the system as applied to our operations. This can only be done after implementation and should be done within 120 days after the switch.

The Denver Sheriff Department strives to ensure speedy, accurate, and complete Intake Processing. In support of this effort, in October 2018, the Department of Public Safety, Denver Sheriff Department and the Denver Police Department began a pilot jail intake program. The program introduced new fingerprint technology at the beginning of the intake process to speed up the time a person being booked into jail can be identified using biometrics, cleared of any outstanding warrants and scheduled for their first court appearance. This pilot has already shown success in achieving these goals. Identification times have been drastically reduced. Additionally, there have been other process improvements made to the intake process in order to expedite the time a person remains in intake.

Any discrepancy between policy and practice in intake will be addressed and resolved through a combination of policy revision, training, and changes to practice. Intake policy will be reviewed by the Research & Development Team to ensure procedures are adequately
documented. Operational Support Command will carry out a review of intake practices to identify any deficiencies and provide training on appropriate intake practices. Additionally, the Sheriff Department will coordinate with the Denver Peak academy and internal Peak Black Belts to conduct a LEAN process event to improve operational efficiency and identify obstacles to consistent application of department procedure in the Intake process. Changes to the intake process may be made based on the results of the LEAN event, the Operational Support Command review, and the findings of the Research & Development Team. The initial review of intake policy will occur within 90 days.

1.2 **Align Direct Supervision Policies and Procedures with Leading Practices** – The Denver Sheriff Department should align its policies and procedures to ensure its direct supervision practices conform with leading practices, such as guidance from the National Institute of Corrections, including those leading practices related to inmate restraint practices and field training. Additionally, the department should implement necessary monitoring activities to ensure direct supervision practices and department policies are adhered to.

**Agency Response: Disagree, Implementation Date – October 1, 2019**

Agency Narrative: The Denver Sheriff Department agrees that direct supervision practices should conform with leading practices. The Sheriff Department disagrees with the ambiguous use of generic National Institute of Corrections (NIC) standards for our facilities. Denver’s jails are detention facilities, not correctional services. The appropriate standards for jail safety are set by the American Correctional Association (ACA) Standards for Local Adult Detention Facilities, 4th Edition. The Denver Sheriff Department is independently audited by the ACA every three years to verify compliance to 4th edition standards and found to meet 100% of ACA standards in its most recent audit in 2018.

The DSD does not agree that there is a national consensus on leading restraint practices and will not change handcuffing practices. The Sheriff Department cannot identify a national standard on leading restraint practices. Neither the ACA, the American Jail Association, the National Institute for Corrections, or the National Sheriff Association are willing to provide specific guidance on how to restrain persons in custody. The ACA requires its members publish restraint policies but delegates restraint practices to agency discretion. As an accredited agency, the DSD's policies have been reviewed and found to satisfy ACA requirements.

The Denver Sheriff Department believes inmates should be restrained in the least restrictive manner that is reasonably possible while preserving the rights and safety of all individuals. Front handcuffing in routine circumstances is a safe and adequate technique when used according to well-reasoned policy by trained deputies. Although restraining an inmates' hands behind their back reduces the danger posed by a combative inmate, it increases the chance of serious injury should the inmate fall. Behind the back handcuffs are also contraindicated for transportation due to the increased risk of injury to the inmate while in movement. The Sheriff Department further believes that behind the back handcuffing is detrimental to the inmate when in court as the inmate is unable to write, take notes, and the behind the back restraints may negatively impact the perception of the inmate. The Denver Sheriff Department does not intend to change handcuffing practices. However, deputies will be provided additional
training to ensure our staff are well versed on the circumstances requiring behind the back handcuffing.

The DSD is confident that current search practices are designed to balance safety against the legal rights of our population and will take steps to ensure deputies are consistently enforcing policy. It is department policy that searches will be conducted to provide a safe environment, locate and preserve evidence, and to control contraband. While we cannot comment on the specific circumstances observed by the audit team, our search policy does require housing deputies to conduct pat searches whenever an inmate enters or exits their housing unit. Additional training on this duty will be provided to deputies during in service training in 2019. The Sheriff Department Policy Performance Improvement Team is currently revising housing orders to consolidate and simplify policies, including the pat search requirement and should be finished with their work within 90 days.

The Sheriff department agrees deputies should receive consistent on the job training. Delivering consistent and effective training is a career long process which our Training Academy and field training officer programs are continuously working to improve. The DSD Training Academy is reviewing recent advances in adult learning models to identify potential improvements which can be integrated into future FTO training. This review is expected to take place within 90 days.

1.3 Develop, Document, and Implement Cohesive Incident Response Strategies – To ensure department staff respond to incidents in a manner that mitigates risk to jail safety and security, the Denver Sheriff Department should develop, document, and adhere to cohesive incident response strategies. This should include aligning its existing incident response policies and procedures to conform with leading practices, such as guidance from the National Institute of Corrections, and cohesive strategies for decision-making, communication, and resource management for incident responders.

Agency Response: Agree, Implementation Date – October 1, 2019

Agency Narrative: The Sheriff Department agrees that a consistent, cohesive, and easily understood incident response strategy is in the agency’s best interest. To that end, the Sheriff Department undertook several positive steps in 2018 to rationalize incident responses and will take further steps to continue improving our incident response process.

In 2018, the Grievance and Incident Review Team (GIRT) was established. This unit reviews uses of force and inmate grievances to help the Sheriff Department identify training opportunities and collect useful information to inform future practices. Since standing up this unit, the Sheriff Department has conducted monthly use of force reviews where command staff use the information provided by the GIRT to assess decision-making, communication, and resource management by deputies and the agency in incident responses.

The Sheriff Department agrees that incident response policies should be consistent. The Policy Performance Improvement Team was established in 2018 to review Department policies in all areas for opportunities to simplify and improve policy. As part of this function, the Policy Performance Improvement Team will conduct a review of incident practices as described in
different policies to consolidate and rationalize incident responses into a cohesive framework. The Policy Performance Improvement Team is tasked with rationalizing our current incident response system, while maintaining a reasonable level of flexibility to encourage deputy initiative in responding to incidents. This review should be completed within 180 days.

In addition to learning from our routine incidents, the Sheriff Department has taken proactive measures to enhance our capacity to respond to a significant incident. The Emergency Response Unit conducts annual drills to test deputy knowledge of emergency response protocols and to identify potential improvements to resources, staff, and response practices in an emergency. The outcomes of these annual drills are shared between command staff and the participating deputies, and the resulting findings are integrated into agency planning moving forward.

In addition, our new Director of Security is responsible for ensuring the physical security of our facilities. During the interim, before a new director was appointed, the agency has conducted facility security checks and emergency response drills. The Colorado Department of Corrections also conducted a Vulnerability Assessment from January 7 through the 11th, 2019 to review our current physical security. The ERU unit conducted emergency response drills at the DDC on December 19, 2018. Our Director of Security will also serve as the agency point of contact for state and federal emergency management concerns.

### 1.4 Develop, Document, and Implement Comprehensive Risk Management Strategies

The Denver Sheriff Department should develop, document, and adhere to a comprehensive set of risk management strategies that identifies systematic and consistent approaches for incorporating risk management into jail operations and planning processes. Specifically, the strategies should identify and describe strategies for detecting existing and potential risk, assessing the likely effect of risk on jail operations, and establishing risk control measures. Moreover, the comprehensive strategies should clearly define the structure required for directing implementation—including centralized coordination, establishing accountability, monitoring progress, making required changes, and reporting in a timely manner to the jail administrator and the funding authority.

**Agency Response: Disagree, Implementation Date – October 1, 2019**

Agency Narrative: The Sheriff Department agrees that current risk management practices should be consolidated into a comprehensive and cohesive practice. Creating an enterprise risk management process for a jail is a multi-stage process which the department is undertaking. The department has completed the preliminary steps through the implementation of ACA standards in functional risk areas. What remains now is to combine those risk controls and functional risk areas into a cohesive program that manages risk as an agency-wide function.

The Sheriff Department agrees that the Grievance and Incident Response Team, the Data & Technology Unit, the Assessment and Inspection Unit, and the Performance Management process are the nucleus of the future risk management program for this Department. The comprehensive risk management plan will draw heavily on these units, in conjunction with the dedicated efforts of our command staff, to ensure risk management is practiced at all levels
of the agency. Further progress will require the department to undertake several changes to current risk control practices and needs to be done in a cautious and well-reasoned manner. The Sheriff Department has designated our Director of Professional Standards as the enterprise risk management champion. A project plan will be developed to integrate comprehensive risk management into management practices within 180 days.

The Sheriff Department plan to develop a comprehensive risk strategy must be grounded on compliance with ACA standards. The principles for risk management in the NIC publication Managing Risk in Jails explicitly integrates the ACA Standards for Local Adult Detention Facilities, 4th edition. Abiding by the appropriate ACA standards allows the Sheriff Department to integrate the combined experiences and advice of a national organization into its practices. For example, ACA standard 4-ALDF-1A-08 states: “The facility injury experience for serious inmate injuries is analyzed at least annually, problems are identified, and corrective actions are developed and implemented, if applicable.” As a result, the Sheriff Department conducts annual reviews of inmate injuries to identify trends and patterns in inmate serious injury; an essential part of any risk management practice. The ACA standards followed by the Sheriff Department are a collection of nationally recognized risk management strategies that should form the basis for the department’s own plan moving forward.

1.5 Develop and Implement Data Management Plan – The Denver Sheriff Department should develop and adhere to a cohesive, comprehensive data management plan to include strategies and processes for improving the following:

- Collecting and coding of data—including ensuring the department’s data system and staff are equipped to collect and report reliable data;
- Analyzing and interpreting the data collected—including leveraging existing units to understand relationships and dependencies between the data elements collected and the risks to jail safety and security; and
- Communicating the results of analyses to stakeholders for decision-making—including developing mechanisms to ensure objective, easily understood reports are communicated in a transparent and accountable manner throughout the organization.

Agency Response: Agree, Implementation Date – December 31, 2019

Agency Narrative: The Denver Sheriff Department is strongly invested in comprehensive data management as a decision-making tool. The Department has integrated data analysis into its decision-making process through its performance management program. The information collected by Sheriff Department staff through our software architecture and direct information gathering is aggregated and reviewed by operational staff and the Data and Technology Unit (DTU) to identify key metrics and patterns. The data analyzed by the DTU is then used to enhance decision making by providing leadership with topical and accurate information on trends and patterns in DSD operations.

The current DSD Performance Management (PM) model incorporates all executive and senior level leadership staff that have worked in tandem with our DTU to identify and develop Key Performance Indicators (KPI) that represent organizational value streams and associated
data. The data development ranges from extensive PowerBI dashboards, standard reports, to manual report review and compilation. The Performance Management Program fosters transparency through data management, provides oversight and allows DSD leadership to identify goals and set a strategic direction to improve service delivery to those in our care and custody.

The Denver Sheriff Department’s Data and Technology Unit (DTU) is continuously improving its practices, including the proper usage of software and the management and organization of data. The Sheriff Department uses the data available through its current software architecture, but recognizes the potential for improvements in the future. The current software architecture presents limitations to leading practices which will be addressed with the implementation of ATIMS 2.0.

1.6 Develop, Document, and Implement Monitoring and Evaluation Strategies for New Jail Management System – In addition to Recommendation 1.5, the Denver Sheriff Department’s data management approach should provide for monitoring and evaluation of the new jail management system’s implementation to ensure all critical system design elements are delivered by its vendor and incorporated in its operations.

Agency Response: Agree, Implementation Date – December 31, 2019

Agency Narrative: The Denver Sheriff Department agrees that oversight of the new JMS tool should be comprehensive. Prior to this audit, the Sheriff Department assigned a team of deputies from key agency functional areas to participate in the ongoing process of testing and reviewing features to ensure they fit agency needs. The team is providing a comprehensive approach to the implementation. The DSD leadership is open to recommendations of specific proactive measures to ensure the new ATIMS system is responsive and customized to our needs.
March 7, 2019 (Revised March 14, 2019)

Auditor Timothy M. O’Brien, CPA
Office of the Auditor
City and County of Denver
201 West Colfax Avenue, Dept. 705
Denver, Colorado 80202

Dear Mr. O’Brien,

Thank you for your interest in our important work and review of our safety-related detention facility practices. The Denver Sheriff Department continuously strives to take positive steps in improving the safety and quality of the services delivered to our staff and the inmates placed in our care. As we enter our fifth year as one of only 46 triple-crown accredited agencies in the nation, the Sheriff Department has demonstrated a long-term dedication to following national leading practices in all our operations. Please find our response below to each of the recommendations made in your report.

AUDIT FINDING 1
Fragmented Management Processes Prevent the Sheriff Department from Having a Comprehensive Understanding of Risks to Jail Safety and Security

RECOMMENDATION 1.1

Align Intake and Classification Processes with Leading Practices – The Denver Sheriff Department should align its intake and classification processes with leading practices, such as guidance from the National Institute of Corrections, and with department policies and procedures. This should include documentation of procedures not currently outlined in department policies and procedures, as well as appropriate risk control strategies related to external actors, management supervision, capacity and housing issues, and data system design.

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<tr>
<td>Agree</td>
<td>7/1/19 (Intake policy review) 5/1/20 (Classification)</td>
<td>Chief Elias Diggins PH: 720-337-0180</td>
</tr>
</tbody>
</table>
**Narrative for Recommendation 1.1**

The Denver Sheriff Department agrees that classification and intake procedures should align with leading practices. The Sheriff Department has already taken steps to verify current practices are adequate and will take further measures to ensure the same going forward.

To ensure classification practices meet national leading practices, the Sheriff Department manages an ongoing cycle of past, present, and future studies of the classification process to identify opportunities for improvement. Current classification and housing practices were reviewed in 2015 through a technical assistance project with the National Institute of Corrections. Recommendations from that review have been integrated into DSD practices. As part of this continuous effort to ensure our classification system aligns with leading practices, the Sheriff Department began a comprehensive review of classification practices in 2018 to determine whether the department should adapt a new classification system. Based on that review, the DSD will switch to the decision tree classification system integrated into the new jail management system when the DSD implements its new jail management system, ATIMS 2.0. The DSD will address the concerns on validation raised by the City Auditor by conducting an external assessment of the system as applied to our operations. This can only be done after implementation and should be done within 120 days after the switch.

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Any discrepancy between policy and practice in intake will be addressed and resolved through a combination of policy revision, training, and changes to practice. Intake policy will be reviewed by the Research & Development Team to ensure procedures are adequately documented. Operational Support Command will carry out a review of intake practices to identify any deficiencies and provide training on appropriate intake practices. Additionally, the Sheriff Department will coordinate with the Denver Peak academy and internal Peak Black Belts to conduct a LEAN process event to improve operational efficiency and identify obstacles to consistent application of department procedure in the Intake process. Changes to the intake process may be made based on the results of the LEAN event, the Operational Support Command review, and the findings of the Research & Development Team. The initial review of intake policy will occur within 90 days.
RECOMMENDATION 1.2
Align Direct Supervision Policies and Procedures with Leading Practices – The Denver Sheriff Department should align its policies and procedures to ensure its direct supervision practices to conform with leading practices, such as guidance from the National Institute for Corrections, including those leading practices related to inmate restraint practices and field training. Additionally, the department should implement necessary monitoring activities to ensure direct supervision practices and department policies are adhered to.

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</table>
| Disagree                             | 10/1/19                                                                                   | Chief Connie Coyle  
PH: 720-865-4138                                                   |

Narrative for Recommendation 1.2

The Denver Sheriff Department agrees that direct supervision practices should conform with leading practices. The Sheriff Department disagrees with the ambiguous use of generic National Institute of Corrections (NIC) standards for our facilities. Denver’s jails are detention facilities, not correctional services. The appropriate standards for jail safety are set by the American Correctional Association (ACA) Standards for Local Adult Detention Facilities, 4th Edition. The Denver Sheriff Department is independently audited by the ACA every three years to verify compliance to 4th edition standards and found to meet 100% of ACA standards in its most recent audit in 2018.

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deputies will be provided additional training to ensure our staff are well versed on the circumstances requiring behind the back handcuffing.

The DSD is confident that current search practices are designed to balance safety against the legal rights of our population and will take steps to ensure deputies are consistently enforcing policy. It is department policy that searches will be conducted to provide a safe environment, locate and preserve evidence, and to control contraband. While we cannot comment on the specific circumstances observed by the audit team, our search policy does require housing deputies to conduct pat searches whenever an inmate enters or exits their housing unit. Additional training on this duty will be provided to deputies during in service training in 2019. The Sheriff Department Policy Performance Improvement Team is currently revising housing orders to consolidate and simplify policies, including the pat search requirement and should be finished with their work within 90 days.

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**RECOMMENDATION 1.3**

*Develop, Document, and Implement Cohesive Incident Response Strategies* — To ensure department staff respond to incidents in a manner that mitigates risk to jail safety and security, the Denver Sheriff Department should develop, document, and adhere to cohesive incident response strategies. This should include aligning its existing incident response policies and procedures to conform with leading practices, such as guidance from the National Institute of Corrections, and cohesive strategies for decision-making, communication, and resource management for incident responders.

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| Agree                                | 10/1/19                                                                                         | Chief Connie Coyle  
PH: 720-865-4138                                                      |

**Narrative for Recommendation 1.3**

The Sheriff Department agrees that a consistent, cohesive, and easily understood incident response strategy is in the agency’s best interest. To that end, the Sheriff Department undertook several positive steps in 2018 to rationalize incident responses and will take further steps to continue improving our incident response process.

In 2018, the Grievance and Incident Review Team (GIRT) was established. This unit reviews uses of force and inmate grievances to help the Sheriff Department identify training opportunities and collect useful information to inform future practices. Since standing up this unit, the Sheriff
Department has conducted monthly use of force reviews where command staff use the information provided by the GIRT to assess decision-making, communication, and resource management by deputies and the agency in incident responses.

The Sheriff Department agrees that incident response policies should be consistent. The Policy Performance Improvement Team was established in 2018 to review Department policies in all areas for opportunities to simplify and improve policy. As part of this function, the Policy Performance Improvement Team will conduct a review of incident practices as described in different policies to consolidate and rationalize incident responses into a cohesive framework. The Policy Performance Improvement Team is tasked with rationalizing our current incident response system, while maintaining a reasonable level of flexibility to encourage deputy initiative in responding to incidents. This review should be completed within 180 days.

In addition to learning from our routine incidents, the Sheriff Department has taken proactive measures to enhance our capacity to respond to a significant incident. The Emergency Response Unit conducts annual drills to test deputy knowledge of emergency response protocols and to identify potential improvements to resources, staff, and response practices in an emergency. The outcomes of these annual drills are shared between command staff and the participating deputies, and the resulting findings are integrated into agency planning moving forward.

In addition, our new Director of Security is responsible for ensuring the physical security of our facilities. During the interim, before a new director was appointed, the agency has conducted facility security checks and emergency response drills. The Colorado Department of Corrections also conducted a Vulnerability Assessment from January 7 through the 11th, 2019 to review our current physical security. The ERU unit conducted emergency response drills at the DDC on December 19, 2018. Our Director of Security will also serve as the agency point of contact for state and federal emergency management concerns.

**RECOMMENDATION 1.4**

**Develop, Document, and Implement Comprehensive Risk Management Strategies** – The Denver Sheriff Department should develop, document, and adhere to a comprehensive set of risk management strategies that identifies systematic and consistent approaches for incorporating risk management into the jail operations and planning processes. Specifically, the strategies should identify and describe strategies for detecting existing and potential risk, assessing the likely effect of risk on jail operations, and establishing risk control measures. Moreover, the comprehensive strategies should clearly define the structure required for directing implementation—including centralized coordination, establishing accountability, monitoring progress, making required changes, and reporting in a timely manner to the jail administrator and the funding authority.

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<td>Disagree</td>
<td>10/1/19</td>
<td>Dir. Of Prof. Standards, Fran Gomez</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PH: 720-865-4144</td>
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Narrative for Recommendation 1.4

The Sheriff Department agrees that current risk management practices should be consolidated into a comprehensive and cohesive practice. Creating an enterprise risk management process for a jail is a multi-stage process which the department is undertaking. The department has completed the preliminary steps through the implementation of ACA standards in functional risk areas. What remains now is to combine those risk controls and functional risk areas into a cohesive program that manages risk as an agency-wide function.

The Sheriff Department agrees that the Grievance and Incident Response Team, the Data & Technology Unit, the Assessment and Inspection Unit, and the Performance Management process are the nucleus of the future risk management program for this Department. The comprehensive risk management plan will draw heavily on these units, in conjunction with the dedicated efforts of our command staff, to ensure risk management is practiced at all levels of the agency. Further progress will require the department to undertake several changes to current risk control practices and needs to be done in a cautious and well-reason manner. The Sheriff Department has designated our Director of Professional Standards as the enterprise risk management champion. A project plan will be developed to integrate comprehensive risk management into management practices within 180 days.

The Sheriff Department plan to develop a comprehensive risk strategy must be grounded on compliance with ACA standards. The principles for risk management in the NIC publication *Managing Risk in Jails* explicitly integrates the ACA *Standards for Local Adult Detention Facilities*, 4th edition. Abiding by the appropriate ACA standards allows the Sheriff Department to integrate the combined experiences and advice of a national organization into its practices. For example, ACA standard 4-ALDF-1A-08 states: “The facility injury experience for serious inmate injuries is analyzed at least annually, problems are identified, and corrective actions are developed and implemented, if applicable.” As a result, the Sheriff Department conducts annual reviews of inmate injuries to identify trends and patterns in inmate serious injury; an essential part of any risk management practice. The ACA standards followed by the Sheriff Department are a collection of nationally recognized risk management strategies that should form the basis for the department’s own plan moving forward.

RECOMMENDATION 1.5
Develop and Implement Data Management Plan – The Denver Sheriff Department should develop and adhere to a cohesive, comprehensive data management plan to include strategies and processes for improving the following:
- Data collection and coding—including its data system and staff are equipped to collect and report reliable data;
- Analyzing and interpreting the data collected—including leveraging existing units to understand relationships and dependencies between the data elements collected and the risks to jail safety and security; and
- Communicating the results of analyses to stakeholders for decision-making—including developing mechanisms to ensure objective, easily understood reports are communicated in a transparent and accountable manner throughout the organization.
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<td>Agree</td>
<td>12/31/19</td>
<td>Dir. Data &amp; Technology, Diane Muscianisi PH: 720-865-4108</td>
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**Narrative for Recommendation 1.5**

The Denver Sheriff Department is strongly invested in comprehensive data management as a decision making tool. The Department has integrated data analysis into its decision making process through its performance management program. The information collected by Sheriff Department staff through our software architecture and direct information gathering is aggregated and reviewed by operational staff and the Data and Technology Unit (DTU) to identify key metrics and patterns. The data analyzed by the DTU is then used to enhance decision making by providing leadership with topical and accurate information on trends and patterns in DSD operations.

The current DSD Performance Management (PM) model incorporates all executive and senior level leadership staff that have worked in tandem with our DTU to identify and develop Key Performance Indicators (KPI) that represent organizational value streams and associated data. The data development ranges from extensive PowerBI dashboards, standard reports, to manual report review and compilation. The Performance Management Program fosters transparency through data management, provides oversight and allows DSD leadership to identify goals and set a strategic direction to improve service delivery to those in our care and custody.

The Denver Sheriff Department’s Data and Technology Unit (DTU) is continuously improving its practices, including the proper usage of software and the management and organization of data. The Sheriff Department uses the data available through its current software architecture, but recognizes the potential for improvements in the future. The current software architecture presents limitations to leading practices which will be addressed with the implementation of ATIMS 2.0.

**RECOMMENDATION 1.6**

**Develop, Document, and Implement Monitoring and Evaluation Strategies for New Jail Management System** – In addition to Recommendation 1.5, the Denver Sheriff Department’s data management approach should provide for monitoring and evaluation of the new jail management system’s implementation to ensure all critical system design elements are delivered by its vendor and incorporated in its operations.

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<td>Dir. Technology Management, Diane Muscianisi PH: 720-865-4108</td>
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Narrative for Recommendation 1.6

The Denver Sheriff Department agrees that oversight of the new JMS tool should be comprehensive. Prior to this audit, the Sheriff Department assigned a team of deputies from key agency functional areas to participate in the ongoing process of testing and reviewing features to ensure they fit agency needs. The team is providing a comprehensive approach to the implementation. The DSD leadership is open to recommendations of specific proactive measures to ensure the new ATIMS system is responsive and customized to our needs.

Please contact the points of contact identified above with any questions.

Sincerely,

Patrick Firman
Sheriff

cc: Valerie Walling, Deputy Auditor, CPA, CMC®
LaKesha Allen Horner, MPA, Audit Supervisor
Katja E. V. Freeman, MA, MELP, Audit Manager
Evan Dreyer, Deputy Chief of Staff, Office of the Mayor
Troy Riggs, Executive Director of Safety
Connie Coyle, DSD Chief of Administration Division
Elias Diggins, DSD Chief of Operations Division
Andrea Albo, DSD Chief of Staff
EXHIBIT

Auditor’s Addendum

The Sheriff Department disagrees with two of our recommendations in its formal response. However, the Sheriff agreed in an email to auditors that “there is room for agreement in all the recommendations made” in the audit report. Further, he confirmed the department intends to take some executive action on the recommendations as proposed and provided implementation time frames in the agency response.

For Recommendation 1.2, the Sheriff Department agrees with our finding that direct supervision practices should conform with leading practices. However, the department disagrees with the use of National Institute of Corrections guidance for its facilities and would prefer to use standards from the American Correctional Association. Similarly, for Recommendation 1.4, the Sheriff Department agrees its current risk management practices should be consolidated into a comprehensive and cohesive practice, but it would prefer to use American Correctional Association standards—as opposed to National Institute of Corrections guidance.

The U.S. Department of Justice’s National Institute of Corrections is recognized as having leading expertise in management practices for federal and state correctional facilities, as well as local jail facilities. In fact, the Sheriff Department itself has leveraged leading practices published by the National Institute of Corrections to identify opportunities to improve department operations.

For example, in its response to Recommendation 1.1, the department states: “Current classification and housing practices were reviewed in 2015 through a technical assistance project with the National Institute of Corrections” and that recommendations from that review have been integrated into department practices. Further, in its response to Recommendation 1.4, the department acknowledges the National Institute of Corrections’ “Managing Risk in Jails” publication—which the audit team used to support this recommendation—aligns with the American Correctional Association’s “Standards for Local Adult Detention Facilities,” Fourth Edition. Finally, the Sheriff Department has consulted with and relied on the institute’s materials to provide staff training.

Therefore, the audit team finds the guidance from the National Institute of Corrections to be a sound basis for comparison when discussing weaknesses within the department’s direct supervision and risk management practices.

Though we continue to believe the National Institute of Corrections to be relevant criteria, our recommendations do not require a specific set of standards to be used by the Sheriff Department. We are asking the department to re-evaluate and align its direct supervision activities and risk management with leading practices—including, for Recommendation 1.2, those leading practices related to inmate restraint practices and field training to improve safety in the City’s jails. We reference National Institute of Corrections guidance to provide the department with an opportunity to consider those or other leading practices that it might consider more appropriate for the City’s jails.
OBJECTIVE

The objective of the audit was to assess the effectiveness of Denver Sheriff Department efforts to ensure the safe and secure operation of the City and County of Denver’s jails—including an examination of operational trends and management practices that affect the safety and security of the jails for the public, staff, and inmates.

SCOPE

During our examination of the effectiveness of Sheriff Department efforts to ensure the safe and secure operation of the City’s jails, we analyzed factors including trends related to inmate demographics, incidents, and other characteristics. We also examined the extent to which Sheriff Department practices for intake and classification, direct supervision, and incident response support the safe and secure operation of the jails, including efforts to manage risks. The jail facilities analyzed were specifically the Van Cise-Simonet Detention Center in downtown Denver and the Denver County Jail. The period of our analysis was January 1, 2016, through July 31, 2018.

METHODOLOGY

We applied multiple methodologies to gather and analyze information pertinent to the audit scope. Specifically, to assess the effectiveness of Denver Sheriff Department efforts to ensure the safe and secure operation of the City’s jails, we applied the following methodologies:

- Identified and described Sheriff Department methodologies for collecting and analyzing data related to jail administration and operations, including practices for using the data to manage risks.
- Assessed the reliability of data obtained from Sheriff Department information systems to determine the extent to which data are reasonably complete and accurate, meet the intended purpose, and are not subject to inappropriate alteration. This assessment included interviews and observations with Sheriff Department officials and others to understand the internal control environment in which the data are maintained, and physical testing of the data for accuracy and completeness—including corroboration of Sheriff Department data with third-party information systems to the extent available.
- Analyzed Sheriff Department administrative and operational data to identify and summarize jail population, staffing, and safety-related trends, including assaults and uses of force.
- Identified and summarized the results of the Sheriff Department staff climate survey results to provide contextual information about jail operations, including factors that impact the safe and secure operation of the City’s jails.
- Identified and described Sheriff Department processes related to intake and classification, direct supervision, and incident response.
• Analyzed Sheriff Department operational data to identify and summarize trends and relationships associated with intake and classification, direct supervision, and incident response.

• Compared Sheriff Department processes for intake and classification, direct supervision, and incident response to department policies and procedures and leading industry practices and professional and internal control standards identified by the U.S. Department of Justice’s National Institute of Corrections and the U.S. Government Accountability Office.

• Compared Sheriff Department processes for assessing and managing safety-related risks with leading management practices and professional and internal control standards identified by the National Institute of Corrections and the U.S. Government Accountability Office.

• Observed Sheriff Department operations to obtain contextual information about jail population, staffing, and safety-related trends and relationships. Also, observed select Sheriff Department practices for intake and classification, direct supervision, and incident response to obtain contextual information about the extent to which these processes support the safe and secure operation of the City’s jails.

• Interviewed Sheriff Department officials to obtain contextual information about jail population, staffing, and safety-related trends and relationships. Also, interviewed officials at the Sheriff Department, the Office of the Independent Monitor, and the City Attorney’s Office, as well as other subject-matter experts, to identify contextual factors affecting jail operations and risk management.
APPENDICES

Appendix A – Principles of Direct Supervision

The U.S. Department of Justice’s National Institute of Corrections defines “direct supervision” as a jail management approach that combines physical jail design with operations strategies to reduce problematic behavior to create a jail that is safe and secure for inmates, staff, and visitors.\textsuperscript{57} Table 5 details the institute’s eight principles to help jail administrators guide direct supervision efforts.

<table>
<thead>
<tr>
<th>Principle</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effective Control</td>
<td>The control of an inmate’s behavior is achieved through the application of total control, sound perimeter security, a population divided into manageable groups, easily monitored areas, accountability for behavior, and maximizing inmates' self-control.</td>
</tr>
<tr>
<td>Effective Supervision</td>
<td>Effective supervision of inmates is closely related to effective control but more specifically refers to the interaction between the unit officer and the inmate. Effective supervision is a dynamic process the unit officer employs to manage inmate behavior based on generally accepted behavior management techniques.</td>
</tr>
<tr>
<td>Competent Staff</td>
<td>When a correctional facility emphasizes the management of inmate behavior, staff effectiveness is most critical. When successful operation depends on staff rather than technological devices or physical barriers, staff must be sufficiently competent to achieve these important objectives.</td>
</tr>
<tr>
<td>Safety of Staff and Inmates</td>
<td>Personal safety is a main concern when being incarcerated or seeking employment in a detention facility. It is imperative that jails ensure the safety of staff and inmates, as well as create the perception of safety, for the full benefits of direct supervision to be achieved.</td>
</tr>
<tr>
<td>Manageable and Cost-Effective Operations</td>
<td>This principle is about enabling the facility to fulfill its mission and, at the same time, reduce costs and improve manageability. Jail facilities can achieve this by reducing construction and furnishing costs, having a wider range of architectural options, anticipating fundamental needs, reducing vandalism, ensuring sanitation and order, and providing opportunities for reintegration.</td>
</tr>
<tr>
<td>Effective Communication</td>
<td>Effective communication is a critical ingredient in the operational strategy of all human enterprises. In the jail environment, ensuring frequent inmate and staff communication, communication among staff members, and communication skills training are essential.</td>
</tr>
<tr>
<td>Classification and Orientation</td>
<td>The classification and orientation of inmates must be an integral part of the day-to-day operations of direct supervision facilities and should include orientation, assumption of rational behavior, knowing with whom you are dealing, and maximum supervision during initial hours of confinement.</td>
</tr>
<tr>
<td>Justice and Fairness</td>
<td>Justice is a fundamental aspect of correctional facility management. Jail facilities should have a mission and public policy, a critical leadership quality, and a formal administrative grievance and disciplinary system.</td>
</tr>
</tbody>
</table>

Source: U.S. Department of Justice, National Institute of Corrections.

Appendix B – Leading Practices for Managing Risk in Jails

As discussed under the Finding, risk management is a comprehensive process that helps managers understand risk interactions throughout an organization, including how one risk can augment or offset another. As shown in Table 6, the U.S. Department of Justice’s National Institute of Corrections identifies seven key leading practices to help jail administrators understand risks to jail operations.58

<table>
<thead>
<tr>
<th>Leading Practice</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leadership Support</td>
<td>An organization’s risk management process should exhibit strong senior-level commitment to risk management and should demonstrate this commitment to all stakeholders in the jail’s operations, including its funding authority, jail staff, volunteers, vendors, contractors, partners, and inmates.</td>
</tr>
<tr>
<td>Systematic and Consistent Processes</td>
<td>An organization’s risk management process should reflect systematic and consistent approaches for (a) identifying and evaluating existing risk, (b) assessing the likely effect of risk on the jail, and (c) establishing risk control measures. Additionally, a risk management process should be documented in writing—providing the structure for directing implementation, establishing accountability, monitoring progress, making required changes, and reporting to both the jail administrator and the funding authority. A documented risk management process may consist of multiple living documents (preferably electronic documents) that are easily accessible to the staff members who use them. Finally, an organization’s risk management process should reflect a system for continuous monitoring and review of the jail environment and sufficient flexibility to respond to change and opportunities in a timely manner.</td>
</tr>
<tr>
<td>Assign Responsibilities and Accountability</td>
<td>An organization’s risk management process should reflect centralized coordination to help ensure a jail’s efforts are consistent and working for a common goal—reducing the likelihood of risk “silos” that could result in disjointed communication and actions that are at cross-purposes. An organization’s risk management process should reflect decentralized accountability, ensuring all staff members are responsible for managing risks within the scope of their duties.</td>
</tr>
<tr>
<td>Promote a Risk Management Culture</td>
<td>An organization’s risk management process should reflect stakeholder involvement in and commitment to risk management—including participation from jail staff, supervisors, volunteers, and inmates to understand how risk affects the jail.</td>
</tr>
<tr>
<td>Align Risk Management with Resource Allocation</td>
<td>An organization’s risk management process should be designed to preserve and enhance tangible or intangible assets or resources (e.g., human, financial, property, partners, and reputation) that are important to the jail’s mission and goals.</td>
</tr>
<tr>
<td>Establish Goals and Performance Indicators</td>
<td>An organization’s risk management process should incorporate performance measures or indicators to objectively evaluate and monitor changes in the jail environment—ranging from new types of criminal activity in the community to innovations in jail practices. Performance indicators should be selected to measure processes and outcomes and to reflect what the organization intends to measure.</td>
</tr>
<tr>
<td>Provide Reference Sources</td>
<td>The risk management process should provide guidance for and information to staff and other stakeholders.</td>
</tr>
</tbody>
</table>

Source: U.S. Department of Justice, National Institute of Corrections.

Appendix C – Analysis of Denver Sheriff Department Administrative and Operational Data

Despite the limitations previously identified with the Sheriff Department’s data management practices, auditors worked with the department’s Data Science Unit and other officials from the Sheriff Department and the Department of Public Safety to understand the organization’s methods for collecting and analyzing data related to jail administration and operations—including practices for using the data to manage risks related to safe and secure jail operations.

Though the results of our assessment revealed significant limitations to the data analyzed, we believe the information in this report to be sufficiently reliable for providing a rough approximation of trends and relationships related to the jail population, staffing, and safety-related incidents.

The sections that follow include a description of the methodology and data sources used to develop each analysis, the results of each analysis, and any significant limitations or qualifying information pertaining to the data.

The Jail Population

The audit team worked with Data Science Unit analysts to develop custom queries from the jail management system to identify all individuals in custody as of January 1, 2016, and through July 31, 2018. The Data Science Unit created multiple queries and data sets for this population—including demographics, arrest charges, alerts, and classification records. The audit team restructured these data sets using multiple data analysis software products to present trends on the jail population for this period.

Note that this period includes only two-and-a-half years’ worth of records. Based on programmatic changes, reform efforts, and data collection practices, the audit team selected this scope to analyze and compare the most consistent data possible. However, the shorter scope length limits the degree to which trends can be described.

Number of Inmates by Facility – The Sheriff Department had about 54,519 unique individuals in its custody between January 1, 2016, and July 31, 2018—with daily population counts ranging from a high of 2,603 inmates on a single day in 2017 to a low of 2,040 inmates on a single day in 2016.

Though the daily count of inmates decreased between 2016 and 2018, the Downtown Detention Center exceeded the Sheriff Department’s optimal housing capacity of 92 percent for 909 of the 944 days—or about 96 percent of days during this period. Figure 14 on the following page illustrates the trend for daily counts for the Downtown Detention Center compared to capacity, the department’s optimal capacity range, and the National Institute of Corrections’ threshold for a stressed jail environment. Figure 15, also on the following page, illustrates this same information for the County Jail.
FIGURE 14. Daily Jail Population and Capacity for the Downtown Detention Center

Source: Auditor’s Office analysis of Denver Sheriff Department data.
Note: This analysis reflects daily population count data from January 1, 2016, through July 31, 2018. Reference page 17 for an excerpt of this graph.

FIGURE 15. Daily Jail Population and Capacity for the County Jail

Source: Auditor’s Office analysis of Denver Sheriff Department data.
Note: This analysis reflects daily population count data from January 1, 2016, through July 31, 2018. Reference page 17 for an excerpt of this graph.
Number of Inmates, by Ethnicity, Gender, and Age – Of the average daily count of 2,360 inmates housed in the City’s jails between January 1, 2016, and July 31, 2018, Sheriff Department data indicate that inmates who identified as “white” accounted for the largest percentage of inmates—representing roughly 39 percent of male inmates and 47 percent of female inmates. Figure 16 shows the trend in ethnicity and gender for both facilities for the three most represented ethnicities in the jail population: white, Hispanic, and black. Inmates who identified as Asian accounted for the smallest percentage of inmates incarcerated during this period at slightly over 1 percent. As a result, they are not depicted in the figure below.

About 0.6 percent of inmates did not declare an ethnicity during this period. Also, the median age at the time of booking for male and female inmates was 33 years and 31 years, respectively.

Source: Auditor’s Office analysis of Denver Sheriff Department data.
Note: This analysis reflects daily population count data by ethnicity and gender from January 1, 2016, through July 31, 2018, at both the Downtown Detention Center and the County Jail.
Percentage of Arrest Charges – As shown in Table 7, of the nearly 246,000 arrest charges identified between January 1, 2016, and July 31, 2018, nearly 43 percent came from: warrant arrests (25 percent of all arrest charges), failure to appear warrants (7 percent of all charges), remands from court on existing cases (4 percent of all charges), and unlawful possession of a controlled substance and driving under the influence or while impaired (with each accounting for 3 percent of all charges).

**TABLE 7. Top Arrest Charges**

<table>
<thead>
<tr>
<th>Arrest Charges</th>
<th>Percent*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Warrant Arrest</td>
<td>25%</td>
</tr>
<tr>
<td>Failure to Appear Warrant</td>
<td>7%</td>
</tr>
<tr>
<td>Remanded from Court on Existing Case</td>
<td>4%</td>
</tr>
<tr>
<td>Unlawful Possession of a Controlled Substance</td>
<td>3%</td>
</tr>
<tr>
<td>Driving under the Influence, or Driving While Impaired</td>
<td>3%</td>
</tr>
</tbody>
</table>

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects data on top arrest charges from January 1, 2016, through July 31, 2018.

* The numbers in the table are rounded. Therefore, the percentage reported is slightly different than it would be if calculated using the rounded values in the table. The Sheriff Department arrest charge records do not distinguish the crime for which a judge authorized a warrant arrest. As a result, these data provide limited information related to laws allegedly broken for the population of inmates. General warrant arrest is the primary category under “Warrants,” although the Sheriff Department does appear to distinguish between other types of warrants in the charge data including failure to appear, writs, failure to comply, Immigration and Customs Enforcement, probable cause, and bench warrants. Because of the volume of arrest charges in the system, we present only the top five charges. As a result, this table does not sum to 100 percent.
Average Daily Count, by Classification Level and Facility – Between January 1, 2016, and July 31, 2018, most inmates at the Downtown Detention Center were classified as Levels 3 and 4. Most inmates at the County Jail were classified as Levels 4 and 5. Figure 17 illustrates the trend in classification levels for each facility.

FIGURE 17. Average Daily Count by Classification Level and Facility

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects data on daily population counts by classification level and facility from January 1, 2016, through July 31, 2018.
Average Daily Count, by Alert Type – Figure 18 provides the average daily count of alert types in the population for each facility between January 1, 2016, and July 31, 2018. Although the Sheriff Department uses multiple alert types, the audit team selected only those alerts likely to have safety or security implications. These include: mental health alerts and suicide flags, required security-related separations for transport or from other inmates and staff, medical conditions, suspected or confirmed gang affiliations, and select administrative notes for psychological reasons, social behavior, violence, or aggression.

**FIGURE 18. Inmates by Alert Type**

![Bar chart showing average number of alerts by alert type and facility.]()

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects alerts data from January 1, 2016, through July 31, 2018.
Staffing

The audit team worked with Department of Public Safety human resources personnel to identify reports commonly used from the City’s human resources system, Workday, and to identify current staffing, turnover, and operational strength at the City’s jails. Additionally, the audit team worked with staff from the Sheriff Department’s Scheduling Unit to identify and extract shift records from the department’s time-keeping system, TeleStaff.

Number of Deputies, by Years of Service – As of July 31, 2018, the Sheriff Department employed 1,185 staff. Sworn personnel account for 815 of the total staff. Figure 19 provides the distribution of sworn personnel by rank, which consists of 85 percent deputies, 11 percent sergeants, and about 1 percent majors. The remaining workforce is in executive leadership positions.

The 323 deputy sheriffs and sergeants with less than five years of service and the 376 deputy sheriffs and sergeants with greater than 10 years of service accounted for a combined 89 percent of the department’s sworn personnel. The polarized concentration of staff tenure means the Sheriff Department has a substantial gap in the number of five- to 10-year professionals, who account for about 11 percent of the overall workforce. This gap in workforce experience could lead to a reliance in the future on less-experienced staff as other deputies near retirement.

Reference the Background section for descriptions of the department’s sworn and civilian personnel.

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59 Reference the Background section for descriptions of the department’s sworn and civilian personnel.
Leading management practices direct organizations to retain staff with the necessary skills and abilities to achieve the organization’s mission through succession planning. This succession planning is critical for the Sheriff Department—particularly considering the number of deputies nearing retirement and the department’s retention trends related to resignations after fewer years of service discussed below. Figure 20 shows the number of deputies and sergeants by length of service, as of July 31, 2018.

**FIGURE 20.** Deputies and Sergeants by Length of Service, as of July 31, 2018

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: Page 18 contains a copy of this chart.
Sheriff Department Operational Capability – Between January 1, 2016, and July 31, 2018, the Sheriff Department was allocated funding for between 835 and 872 deputy sheriffs—commonly referred to as “authorized strength.” However, the department’s “adjusted effective strength” during this period ranged from 709 to 765 deputy sheriffs. The department’s operational capability averaged at about 87 percent. Figure 21 charts the weekly adjusted operational capability for August 4, 2017, through August 3, 2018; the Department of Public Safety did not begin preparing these reports for the Sheriff department until August 2017.

**FIGURE 21.** Adjusted Operational Capability

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**Source:** Auditor’s Office analysis of Department of Public Safety data.

**Note:** This analysis reflects data on adjusted operational capability from August 4, 2017, through August 3, 2018. The Department of Public Safety did not begin preparing these reports for the Sheriff Department until August 2017.

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60 The Department of Public Safety calculates an “adjusted effective strength” on a weekly basis for the Sheriff Department. “Adjusted effective strength” is calculated by subtracting the number of new hires, staff on leave, and staff on modified duty from the department’s “actual strength.” The “adjusted effective strength” is then compared to the “authorized strength” from the department’s budget to determine the “adjusted operational capability.” This serves as a measure of available staff on hand each week for jail operations.
Number of Sheriff Deputy Separations, by Year – As noted, the effective strength of the department’s sworn personnel was roughly 87 percent due to turnover, leave, and modified duty. Resignations led the reasons for separation from the department—with the average length of service for resignations declining from nearly five years of service in 2016 to almost three years in 2018. This decline indicates that deputies are resigning with fewer years of service. Figure 22 shows the reasons for separation for sworn personnel from January 1, 2016, through July 31, 2018, while Figure 23 shows the average length of service for sworn personnel who resigned during this period.

**FIGURE 22. Reasons for Separation for Sworn Personnel**

<table>
<thead>
<tr>
<th>YEAR</th>
<th>Resignation</th>
<th>Retirement</th>
<th>Other</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>38</td>
<td>14</td>
<td>2</td>
</tr>
<tr>
<td>2017</td>
<td>73</td>
<td>24</td>
<td>14</td>
</tr>
<tr>
<td>2016</td>
<td>60</td>
<td>20</td>
<td>9</td>
</tr>
</tbody>
</table>

Source: Auditor’s Office analysis of Department of Public Safety data.

Note: This analysis reflects sworn personnel’s reasons for separation from January 1, 2016, through July 31, 2018. The “Other” category includes dismissals and terminations for various reasons, including job abandonment and not meeting medical or minimum qualifications.

**FIGURE 23. Average Length of Service for Sworn Personnel Who Resigned**

- 2016: 4.6 years
- 2017: 3.2 years
- 2018: 2.9 years

Source: Auditor’s Office analysis of Department of Public Safety data.

Note: This analysis reflects data on average length of service for resignations from January 1, 2016, through July 31, 2018. 2018 is a partial year.
**Distribution of Hours, by Shift and Location** – The decline in effective strength could also result in longer shifts for existing deputies. According to department personnel, shifts typically range from 8, 10, or 12 hours depending on the position. According to the National Institute of Corrections, jail administrators should consider the risk of fatigue when developing shift schedules. National Institute of Corrections guidance also outlines shifts in 8-, 10-, and 12-hour increments.

The audit team reviewed records for almost 65,000 shifts. Long shifts are common across facilities, with 2,850 instances of shifts lasting 14 hours or longer during this period. Figure 24 illustrates the distribution of shifts by the number of continuous hours worked. The red box emphasizes the count of shifts that lasted 14 hours or longer.

**FIGURE 24. Distribution of Shift Duration**

![Graph showing the distribution of shift duration](image)

**Source:** Auditor’s Office analysis of Denver Sheriff Department data.

**Note:** This analysis reflects data on shift durations from January 31, 2016, through July 31, 2018. The red box emphasizes the count of shifts that lasted 14 hours or longer. The Sheriff Department began tracking time in TeleStaff, its time-keeping system, on January 31, 2016. Additionally, this analysis excludes administrative, unstaffed, and sick time.

**Safety-Related Incidents**

The Data Science Unit manually collects and codes data for safety-related incidents because of the data-entry inconsistencies and data system limitations discussed in the section of this report related to the department’s data management issues. The audit team consolidated five different trackers for incidents involving assaults, uses of force, and sexual assaults reported under the Prison Rape Elimination Act (or PREA) from January 1, 2017, through July 31, 2018.

As previously discussed, deputies report multiple types of incidents in the jail management system. We refer to these as “incident reports.” Reported incidents could involve offenses in custody, such as an assault or other crime, uses of force, transfer records, or other information. As a result, jail management system incident reports may be associated with more than one incident type in the trackers used by the Data Science Unit.

For example, an incident could include two assaults and a use of force. This means that the sum of
incident types will exceed the total number of unique jail management system incident reports. We have counted each unique incident report once per incident type category; however, the same incident report may be included in multiple incident types. PREA incidents are the notable exception, as the Data Science Unit tracks these by case rather than by involved parties.

Because PREA is a federal law and tracked for accreditation, the Sheriff Department separately tracks incidents alleging sexual assault. For other assaults and uses of force, the Data Science Unit changed its methodology for tracking this information throughout our scope, both in how it counted incidents and the data elements collected for each. Prior to 2017, the Sheriff Department relied on system-generated reports, which hinged on deputies correctly flagging incidents in the jail management system. As a result, prior to 2017, reports likely under-represent the number of incidents occurring each year.

Beginning in January 2017, the Data Science Unit implemented its review process and implemented a single tracker for all parties involved in assaults and associated uses of force. Starting in September 2017, analysts began to collect information separately by assault victim type—staff or inmate—and on any use of force, regardless of its association with an assault. Additionally, policy changes and training on report-writing have also occurred throughout our scope, which may also artificially drive trends in reported incidents.

As a result, trends in safety-related incidents may be misleading and should be viewed with consideration of these multiple factors that affect the number of incidents reported. Because the impact of these events varies by incident type, the audit team included all incident data available but has qualified results for each analysis according to impact and relevant dates.

For example, auditors estimate that PREA and assault incident types are reasonably reliable from January 1, 2017, through July 31, 2018. Specific to use-of-force incident types, auditors estimate these are reasonably reliable from September 1, 2017, through July 31, 2018. For all safety incident types, the Sheriff Department consistently reported reliable data only for the fourth quarter of 2017 and the first two quarters of 2018. The shorter scope length for all incidents limits the degree to which the trends presented below can be described in terms of strength and causes.
Number of Safety-Related Incidents, by Date and Location – Based on the data available, between January 1, 2017, and July 31, 2018, the Sheriff Department reported roughly 3,051 unique safety-related incident reports for a total of 3,585 incident types. This represents an average of about five unique incidents per day related to assaults, PREA, or use of force. Figure 25 illustrates the frequency of unique incident reports by day for January 1, 2017, through July 31, 2018.

FIGURE 25. Frequency of Incident Reports by Day

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects data on incident reports from January 1, 2017, through July 31, 2018. This chart represents unique incident reports and totals to 3,051. Limitations related to incident data resulted in a shorter scope of reliable and consistent data for analysis. The shorter scope length limits the degree to which the trends presented can be described. Additionally, uses of force are likely under-reported for the period from January 1, 2017, through August 31, 2017. Page 35 includes a copy of this chart.
Figure 26 presents incident types by quarter from January 1, 2017, through July 31, 2018.

**FIGURE 26. Incident Types by Quarter**

The Sheriff Department data revealed that 2,429 of the incidents occurred at the Downtown Detention Center—representing about 80 percent of the incidents reported. Within the Downtown Detention Center, there was a higher occurrence of incidents reported in certain areas. For example, incidents associated with the intake area accounted for 301 incidents at the Downtown Detention Center, or about 12 percent. Incidents in the medical and mental health units accounted for 349 incidents reported at the Downtown Detention Center during this period, or just over 14 percent.
**Number of Safety-Related Incidents, by Risk or Force** – Based on the data available, we worked with members of the Data Science Unit to develop a measure of severity for each incident type to track trends over time. For assaults, we examined how likely the incident was to result in physical harm or violence. For uses of force, we flagged incidents by the highest level of force deputies used to regain control of inmates. And for PREA incidents, we examined whether the claim was substantiated, pending investigation, or unsubstantiated.

We discuss relevant methodology and results for each of the incident types below.

- **Assaults** – Assaults include several different scenarios. The Data Science Unit classified entries as variants of physical, fight, bodily fluid, other or unknown fluid, and threats. We categorized physical, fight, and bodily fluid as having a high risk of physical harm or violence to a victim, with other or unknown fluid as medium risk and threats as low risk. About 63 percent of assaults involve a high risk of physical harm or violence. Inmate-on-inmate assaults have a higher prevalence of high-risk assaults, while inmate-on-staff have a higher prevalence of low-risk assaults. Figure 27 lists the number of assaults by level of risk and victim type from January 1, 2017, through July 31, 2018.

**FIGURE 27. Assaults by Level of Risk and Victim Type**

```
<table>
<thead>
<tr>
<th>Number of Assaults</th>
<th>Total</th>
<th>High-Risk</th>
<th>Medium-Risk</th>
<th>Low-Risk</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inmate-on-Staff</td>
<td>303</td>
<td>54</td>
<td>500</td>
<td>124</td>
</tr>
<tr>
<td>Inmate-on-Inmate</td>
<td>897</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
```

*Source: Auditor’s Office analysis of Denver Sheriff Department data.*

*Note: This analysis reflects assaults data from January 1, 2017, through July 31, 2018.*
Table 8 lists the number of assaults by level of risk for each facility from January 1, 2017, through July 31, 2018.

**TABLE 8.** Assaults by Level of Risk and Facility

<table>
<thead>
<tr>
<th>Facility</th>
<th>Level of Risk of Physical Harm or Violence</th>
<th>Inmate-on-Inmate</th>
<th>Inmate-on-Staff</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>County Jail</td>
<td>High-Risk</td>
<td>200</td>
<td>8</td>
<td>208</td>
</tr>
<tr>
<td></td>
<td>Medium-Risk</td>
<td>1</td>
<td>5</td>
<td>6</td>
</tr>
<tr>
<td></td>
<td>Low-Risk</td>
<td>17</td>
<td>48</td>
<td>65</td>
</tr>
<tr>
<td>Downtown Detention Center</td>
<td>High-Risk</td>
<td>697</td>
<td>290</td>
<td>987</td>
</tr>
<tr>
<td></td>
<td>Medium-Risk</td>
<td>13</td>
<td>49</td>
<td>62</td>
</tr>
<tr>
<td></td>
<td>Low-Risk</td>
<td>107</td>
<td>451</td>
<td>558</td>
</tr>
<tr>
<td>Other Locations</td>
<td>High-Risk</td>
<td>0</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td></td>
<td>Medium-Risk</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Low-Risk</td>
<td>0</td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

*Source:* Auditor’s Office analysis of Denver Sheriff Department data.

*Note:* This analysis reflects assaults data from January 1, 2017, through July 31, 2018.
Monthly reports of high-risk assaults have increased slightly at both facilities. For example, the Downtown Detention Center reported 46 incidents in January 2017, compared to 61 in July 2018. Similarly, the County Jail reported four high-risk incidents in January 2017, compared to 14 in July 2018. Figure 28 presents the monthly trend for high-risk assaults at both facilities. As discussed, changes to information reporting and data collection practices resulted in a shorter scope of reliable and consistent data for analysis. The shorter scope length limits the degree to which the strength of the trends presented below and their associated causes can be described.

**FIGURE 28. High-Risk Assaults, by Facility**

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects data on high-risk assaults from January 1, 2017, through July 31, 2018. Limitations related to incident data resulted in a shorter scope of reliable and consistent data for analysis. The shorter scope length limits the degree to which the trends presented can be described. Page 20 contains a copy of this chart.
• **Uses of Force** – Under certain circumstances, deputies may need to use some level of force on inmates to maintain or regain effective control. Based on the nature of the jail environment, uses of force are typical and necessary in a correctional setting. The National Institute of Corrections calls for jails to implement well-defined policies and procedures that govern the use of force. Typically, a use of force involves multiple techniques that occur along a continuum of force. Figure 29 describes this continuum as typically applied across law enforcement agencies, according to the National Institute of Justice.

**FIGURE 29. Model Use-of-Force Continuum in Law Enforcement**

<table>
<thead>
<tr>
<th>OFFICER PRESENCE</th>
<th>VERBALIZATION</th>
<th>EMPTY HAND CONTROL</th>
<th>LESS LETHAL</th>
<th>LETHAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>• No Force</td>
<td>• Calm, nonthreatening commands</td>
<td>• SOFT – includes grabs and control holds</td>
<td>• Tools that inflict blunt impacts (e.g., batons or Orcutt Police Nunchaku*)</td>
<td>• Use of firearms</td>
</tr>
<tr>
<td></td>
<td>• Escalating volume and directness</td>
<td>• HARD – includes punches, strikes, or kicks</td>
<td>• Chemical (e.g., pepper spray or tear gas)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Conducted electrical devices (e.g., Taser or stun gun)</td>
<td></td>
</tr>
</tbody>
</table>

**Source:** Information from U.S. Department of Justice’s National Institute of Justice. Image designed by Auditor’s Office staff, using icons made by Freepik from www.flaticon.com.

**Note:** * Orcutt Police Nunchaku is a brand name for the weapon more commonly known as “nunchuks,” which are two sticks joined by a short chain or cord.

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The Data Science Unit records each type of technique and tool used by deputies with each inmate involved in a use-of-force incident. We worked with the analysts to classify each technique and tool in their tracker along the use-of-force continuum. We flagged each use-of-force incident for the highest level of force used by a deputy on any inmate involved. Table 9 lists the technique or tool applied, as well as our categorization along the use-of-force continuum.

**TABLE 9. Auditors’ Categorization for Use of Force**

<table>
<thead>
<tr>
<th>Use-of-Force Technique or Tool</th>
<th>Type of Force on Continuum</th>
</tr>
</thead>
<tbody>
<tr>
<td>Oleoresin Capsicum (OC), or Pepper Spray</td>
<td>Less Lethal</td>
</tr>
<tr>
<td>Orcutt Police Nunchaku&lt;sup&gt;a&lt;/sup&gt;</td>
<td>Less Lethal</td>
</tr>
<tr>
<td>Conducted Electrical Device (e.g., Taser or Stun Gun)</td>
<td>Less Lethal</td>
</tr>
<tr>
<td>Handcuffs</td>
<td>Soft, Empty Hand</td>
</tr>
<tr>
<td>Leg Irons</td>
<td>Soft, Empty Hand</td>
</tr>
<tr>
<td>Strikes</td>
<td>Hard, Empty Hand</td>
</tr>
<tr>
<td>Control Holds</td>
<td>Soft, Empty Hand</td>
</tr>
<tr>
<td>Restraint Chair</td>
<td>Soft, Empty Hand</td>
</tr>
<tr>
<td>Spit Hood&lt;sup&gt;b&lt;/sup&gt;</td>
<td>Soft, Empty Hand</td>
</tr>
<tr>
<td>Firearm</td>
<td>Lethal</td>
</tr>
<tr>
<td>Crisis Intervention Training</td>
<td>De-escalation</td>
</tr>
</tbody>
</table>

**Source:** Auditor’s Office analysis of Denver Sheriff Department data.

**Note:**

<sup>a</sup> Orcutt Police Nunchaku are informally known as “nunchucks,” which are two sticks joined by a short chain or cord.

<sup>b</sup> A “spit hood” is a restraint device used on the head and is intended to prevent someone from spitting or biting.
During this period, the Sheriff Department reported 1,120 use-of-force incidents. As shown in Table 10, the most common level of force used at both the Downtown Detention Center and the County Jail involved “soft, empty hand” techniques—which comprised 803 incidents, or almost 72 percent of the reported force used. Deployment of “less lethal” techniques accounted for 218 incidents, or nearly 20 percent of reported force. Display of “less lethal” force and “hard, empty hand” techniques accounted for 62 incidents, or about 6 percent, and 31 incidents, or about 3 percent, of reported force, respectively. Display of “lethal” force accounted for one incident.

Figures 30 and 31 on the following page depict the frequency of incidents by highest level of force applied for each facility from January 1, 2017, through July 31, 2018. As discussed, changes to information reporting and data collection practices resulted in a shorter scope of reliable and consistent data for analysis. The shorter scope length limits the degree to which the trends presented below can be described.
FIGURE 30. Highest Type of Force for Incidents at Downtown Detention Center

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects data on uses of force from January 1, 2017, through July 31, 2018. Limitations related to incident data resulted in a shorter scope of reliable and consistent data for analysis. The shorter scope length limits the degree to which the trends presented can be described. Additionally, uses of force are likely under-reported from January 1, 2017, through August 31, 2017. The red line noting “New Methodology” marks this change in the data timeline. According to Data Science Unit analysts, the new method for counting uses of force will remain consistent.

FIGURE 31. Highest Type of Force for Incidents at the County Jail

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects data on uses of force from January 1, 2017, through July 31, 2018. Limitations related to incident data resulted in a shorter scope of reliable and consistent data for analysis. The shorter scope length limits the degree to which the trends presented can be described. Additionally, uses of force are likely under-reported from January 1, 2017, through August 31, 2017. The red line noting “New Methodology” marks this change in the data timeline. According to Data Science Unit analysts, the new method for counting uses of force will remain consistent.
- **PREA Incidents** – The Denver Sheriff Department reported a total of 573 sexual-assault incidents under the federal Prison Rape Elimination Act (PREA). Our analysis categorizes the risk associated with PREA incidents based on the outcome of the investigation: substantiated, pending investigation, and unsubstantiated or unfounded allegations. Table 11 provides a count of these incidents by status and facility from January 1, 2017, through July 31, 2018.

**TABLE 11. PREA Incidents by Investigation Status and Facility**

<table>
<thead>
<tr>
<th>Status</th>
<th>County Jail</th>
<th>Downtown Detention Center</th>
<th>Other Locations</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Substantiated</td>
<td>99</td>
<td>49</td>
<td>0</td>
<td>148</td>
</tr>
<tr>
<td>Pending Investigation</td>
<td>15</td>
<td>89</td>
<td>2</td>
<td>106</td>
</tr>
<tr>
<td>Unsubstantiated</td>
<td>147</td>
<td>141</td>
<td>0</td>
<td>288</td>
</tr>
<tr>
<td>Not a PREA</td>
<td>20</td>
<td>11</td>
<td>0</td>
<td>31</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>281</strong></td>
<td><strong>290</strong></td>
<td><strong>2</strong></td>
<td><strong>573</strong></td>
</tr>
</tbody>
</table>

**Source:** Auditor’s Office analysis of Denver Sheriff Department data.

**Note:** This analysis reflects Prison Rape Elimination Act (PREA) data from January 1, 2017, through July 31, 2018. “Not a PREA” indicates a report that did not qualify as a PREA incident under federal reporting requirements.
Both the Downtown Detention Center and County Jail have reported similar occurrence of PREA incidents. However, the County Jail has a higher occurrence of substantiated cases.

Figure 32 illustrates the frequency of substantiated PREA cases for each facility for January 1, 2017, through July 31, 2018. As discussed, changes to information reporting and data collection practices resulted in a shorter scope of reliable and consistent data for analysis. The shorter scope length limits the degree to which the trends presented below can be described.

**FIGURE 32. Substantiated PREA Incidents by Facility**

![Substantiated PREA Incidents by Facility](image)

**Source:** Auditor’s Office analysis of Denver Sheriff Department data.

**Note:** This analysis reflects Prison Rape Elimination Act (PREA) data from January 1, 2017, through July 31, 2018. Limitations related to incident data resulted in a shorter scope of reliable and consistent data for analysis. The shorter scope length limits the degree to which the trends presented can be described. Additionally, substantiated PREA incidents may be under-reported for the last quarter of our scope based on investigation time frames.

**Profile of Parties Involved in Incidents** – We compared certain characteristics for parties involved in safety-related incidents to the whole inmate population. Because the incident data excludes 2016, for consistency we compared only the parties involved in incidents to inmates incarcerated as of January 1, 2017, through July 31, 2018. Our analysis focused on characteristics related to the Sheriff Department’s management of inmates, rather than demographic characteristics inherent to the individual.

- **Classification Levels** – We identified the degree of disproportion for assault perpetrators, victims, and inmates involved in a use of force compared to the total population by classification level. For example, if 30 percent of the total jail population is classified as Level 3, to be proportionate approximately 30 percent of the inmates involved in incidents should also be classified as Level 3. Assault perpetrators and victims have similar trends for over-representation of classification Levels 3 and 4 compared to the total population. However, this similarity is consistent with the purpose of the classification system (i.e., inmates with similar risks should be classified and housed together).

  Overall, we would expect to see more of a tendency toward violence in classification Levels 1-3, again based on the purpose of and factors considered in an objective classification system.
disproportionate representation of classification Level 4 in the assault perpetrator data, however, may result from compromises to the classification system, as discussed beginning on page 25 of the report. In addition, housing design and layout may also provide Levels 3 and 4 with more opportunity to interact with other inmates.

The timing of data collection may also affect these results, as there is a seven- to eight-day gap between the incident and analysts’ review. This may explain the negative disproportion of unclassified individuals in the incident data, compared to the total population. By the time an analyst has collected the data, classification deputies may have already completed their assessment for long-term housing.

Figure 33 below and Figures 34 and 35 on the following page depict the disproportion of each classification level for assault perpetrators, victims, and inmates involved in uses of force, respectively. Positive values in the figures indicate over-representation in the incident data compared to the total population, while negative values indicate under-representation in the incident data.

**FIGURE 33. Disproportion of Assault Perpetrators by Classification Level**

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects population and incident data from January 1, 2017, through July 31, 2018. Parties involved in incidents may have multiple classification levels. This analysis reflects the classification level recorded by the Data Science Unit within a few days of the incident. The department’s tracking process typically runs seven to eight days behind the incident. As a result, if deputies reclassified an inmate based on their role in the incident within that seven- to eight-day window, this data may not capture the classification level at the time of the incident.
FIGURE 34. Disproportion of Assault Victims by Classification Level

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects population and incident data from January 1, 2017, through July 31, 2018. Parties involved in incidents may have multiple classification levels. This analysis reflects the classification level recorded by the Data Science Unit within a few days of the incident. The department’s tracking process typically runs seven to eight days behind the incident. As a result, if deputies reclassified an inmate based on their role in the incident within that seven- to eight-day window, this data may not capture the classification level at the time of the incident.

FIGURE 35. Disproportion of Inmates Involved in Use of Force by Classification Level

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects population and incident data from January 1, 2017, through July 31, 2018. Parties involved in incidents may have multiple classification levels. This analysis reflects the classification level recorded by the Data Science Unit within a few days of the incident. The department’s tracking process typically runs seven to eight days behind the incident. As a result, if deputies reclassified an inmate based on their role in the incident within that seven- to eight-day window, this data may not capture the classification level at the time of the incident.
Alert Types – We identified the degree of disproportion for assault perpetrators, victims, and inmates involved in a use of force compared to the total population by alert type. For example, if 30 percent of the total jail population has a certain type of alert, to be proportionate approximately 30 percent of the inmates involved in incidents should also have the same type of alert.

Alerts may be placed on an inmate before, during, or after an incident. Additionally, inmates may be involved in more than one incident. Because these data points are not tracked within the same data system, the audit team was not able to easily identify alerts that existed prior to an inmate’s incidents.

We limited this analysis to only those alert codes tracked by the Data Science Unit close to the time of the incident: mental health and gang alerts. Notably, inmates with mental health alerts are over-represented as assault perpetrators and as inmates involved with uses of force, while inmates with mental health alerts are under-represented as assault victims. Inmates with gang alerts are over-represented for all incident roles when compared to the total population.

The following four figures illustrate the disproportion of mental health and gang alert types, respectively, for assault perpetrators, victims, and inmates involved in uses of force. Positive values in the figures indicate over-representation in the incident data compared to the total population, while negative values indicate under-representation in the incident data.

**FIGURE 36. Disproportion of Inmates by Mental Health Alert Who Were Perpetrators of Assault**

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects population and incident data from January 1, 2017, through July 31, 2018. This analysis also reflects the presence of a mental health alert recorded by the Data Science Unit within a few days of the incident. The department’s tracking process typically runs seven to eight days behind the incident. As a result, if deputies placed an alert on an inmate based on their role in the incident within that seven- to eight-day window, this data may not capture the alert presence at the time of the incident.
FIGURE 37. Disproportion of Inmates by Mental Health Alert Who Were Victims of Assault

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects population and incident data from January 1, 2017, through July 31, 2018. This analysis also reflects the presence of a mental health alert recorded by the Data Science Unit within a few days of the incident. The department’s tracking process typically runs seven to eight days behind the incident. As a result, if deputies placed an alert on an inmate based on their role in the incident within that seven- to eight-day window, this data may not capture the alert presence at the time of the incident.

FIGURE 38. Disproportion of Inmates by Mental Health Alert Who Were Involved in Use-of-Force Incidents

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects population and incident data from January 1, 2017, through July 31, 2018. This analysis also reflects the presence of a mental health alert recorded by the Data Science Unit within a few days of the incident. The department’s tracking process typically runs seven to eight days behind the incident. As a result, if deputies placed an alert on an inmate based on their role in the incident within that seven- to eight-day window, this data may not capture the alert presence at the time of the incident.
FIGURE 39. Disproportion of Inmates Involved in Incidents by Gang Alert

Source: Auditor’s Office analysis of Denver Sheriff Department data.

Note: This analysis reflects population and incident data from January 1, 2017, through July 31, 2018. This analysis also reflects the presence of a gang alert recorded by the Data Science Unit within a few days of the incident. The department’s tracking process typically runs seven to eight days behind the incident. As a result, if deputies placed an alert on an inmate based on their role in the incident within that seven- to eight-day window, this data may not capture the alert presence at the time of the incident.
The **Auditor** of the City and County of Denver is independently elected by the citizens of Denver. He is responsible for examining and evaluating the operations of City agencies and contractors for the purpose of ensuring the proper and efficient use of City resources. He also provides other audit services and information to City Council, the Mayor, and the public to improve all aspects of Denver's government.

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

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