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AUDITOR’S LETTER

August 25, 2022

The objective of our audit of the city's equity program and practices was to determine whether the Mayor’s Office of Social Equity and Innovation effectively designed, implemented, and evaluated its initiatives to increase social equity and minimize institutional, structural, and systemic racism in the City and County of Denver.

After we finished our audit work, we discovered a consulting contract pertaining to some findings in this report that city officials did not disclose to us. Their lack of disclosure impeded our ability to ensure we fully assessed how the Mayor’s Office of Social Equity and Innovation implemented its equity framework and initiatives. This limitation is described in more detail on page 53 of this report.

The audit determined the Mayor’s Office of Social Equity and Innovation did not adequately structure itself for effective governance. In addition, a city executive order lacks sufficient detail to empower the office to ensure other city agencies comply with the order and support the city’s equity initiatives. The officials who originally led the office did not document how it was designed nor did they formally assess whether that design aligned with citywide initiatives and the needs the office intended to address. Meanwhile, the executive order is vague in key areas, and it does not ensure the longevity of the city’s equity initiatives because executive orders can be revoked by future mayors. The office also does not clearly or consistently communicate with city agencies.

By evaluating its existing design; assessing its authority, needs, and purpose; documenting policies, procedures, and a detailed strategic plan; and improving communication, Social Equity and Innovation will be better equipped to execute its responsibilities and achieve its mission to reduce both social inequity and racial and social injustice.

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.” We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We extend our appreciation to the personnel in the Mayor’s Office of Social Equity and Innovation 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
City Equity Program and Practices
AUGUST 2022

Objective
To determine whether the Mayor’s Office of Social Equity and Innovation effectively designed, implemented, and evaluated its initiatives to achieve its mission, goals, and responsibilities.

Background
The Mayor’s Office of Social Equity and Innovation — established by a mayoral executive order in June 2020 — oversees efforts to evaluate Denver’s systems, policies, and practices to help “increase social equity and to minimize institutional, structural, and systemic racism in City government.”

The office aims to use “best and innovative practices to lead Denver in transformative change with a commitment to equitable outcomes.”

The Mayor’s Office of Social Equity and Innovation Lacks a Detailed Strategic Plan and Other Foundations for Effective Governance

Previous leaders of Social Equity and Innovation did not:

- Document how they designed the program.
- Develop a detailed strategic plan with defined metrics to track progress.
- Develop and document clear roles and responsibilities for office staff and members of other agencies’ equity, diversity, and inclusion teams.

The Executive Order Establishing the Mayor’s Office of Social Equity and Innovation Provides Insufficient Clarity to Empower Staff

Because of the lack of clarity in Executive Order No. 146 — and because of a lack of ongoing support — the Mayor’s Office of Social Equity and Innovation does not have the authority to enforce the executive order’s requirements for city agencies, such as that they attend trainings on race and social justice.

The order also does not clearly define the office's or city agencies' roles in the budget equity process, and it does not define what the required “citywide equity scans” are.

Additionally, the executive order does not ensure the longevity of the city’s equity initiatives — including the Mayor’s Office of Social Equity and Innovation as an established city agency — because executive orders can be revoked by future mayors.

WHY THIS MATTERS
Without properly designed programs, strategies, policies, and procedures and without adequate support from the Mayor’s Office, Social Equity and Innovation cannot successfully oversee efforts to eliminate social inequities and racial and social injustice from city systems and practices — particularly those that affect historically marginalized communities in Denver.

The Mayor’s Office of Social Equity and Innovation Does Not Have a Plan to Ensure Clear, Consistent Communication with Other City Agencies

While the office communicates well, we learned it does not do so with the clarity and consistency other agencies and city employees need to have a uniform understanding of the city's equity initiatives and their role in supporting that work.
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BACKGROUND

Around the country, jurisdictions from the federal level down to the local level and large businesses are committing to focusing on strategies that increase opportunities for communities that have been historically underserved, which benefits everyone. The City and County of Denver is among them.

Governments can improve equity by increasing justice and fairness in policies and procedures and in how they distribute resources. For example, agencies at the federal level have been tasked to “assess whether, and to what extent, its programs and policies perpetuate systemic barriers to opportunities for people of color and underserved groups.”

As the Government Alliance on Race and Equity explains, government at all levels has historically played a role in creating and maintaining racial inequity — including deciding who could vote, who could be a citizen, who could own property, and even the definition of what and who was property.

The Government Alliance on Race and Equity is a national network of government organizations that provides an avenue for sharing best practices and other academic resources among its 409 members. The alliance explains how many of these historical inequities linger today, especially in governments’ policies, procedures, and budget decisions — such as those related to criminal justice, local housing, or infrastructure programs.

THE GOVERNMENT ALLIANCE ON RACE AND EQUITY

The alliance was created in 2017 as a project from Race Forward — an organization founded in 1981 to provide analysis on race and actions toward racial equity. The alliance says its membership includes 210 U.S. cities, 66 counties, and 47 states among other local government offices and large businesses.

The City and County of Denver joined the alliance in August 2018, and the Mayor’s Office of Social Equity and Innovation based its strategies on the alliance’s guidance.

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However, government organizations — like the City and County of Denver — can address systemic inequities by changing policy “at multiple levels and across multiple sectors.”

**Equity, Diversity, and Inclusion**

Words like “equity,” “equality,” “diversity,” and “inclusion” have discrete meanings. The Mayor’s Office of Social Equity and Innovation for the City and County of Denver describes them as follows:

- **EQUITY** – “the fair treatment, access, opportunity, and advancement of all people,” while simultaneously “identifying and eliminating structural barriers and systemic racism” that perpetuate inequity for historically marginalized communities.

- **EQUALITY** – “treating everyone the same regardless of their demographics or specific needs.”

- **DIVERSITY** – when individuals represent a variety of individual or group differences, including “race, ethnicity, gender, gender identity, sexual orientation, religion, disability, socioeconomic status, age, religion, and other areas of identity.”

- **INCLUSION** – embracing individual differences by creating spaces where participants can contribute while being “welcomed, respected, supported, and valued.”

**Mayoral Initiatives**

During the 2018 State of the City address, Mayor Michael B. Hancock announced a citywide equity platform and a commitment to taking a stronger role in connecting all Denver residents to opportunity.

The platform included a race and social justice initiative to provide development opportunities and tools for every city employee so they could design equitable city policies, budgets, and programs. The initiative tasked an equity leadership team with overseeing and developing an equity platform to identify strategies that would strengthen inclusion and equity citywide.

This equity platform eventually led to the mayor signing an executive order two years later that would create the Mayor’s Office of Social Equity and Innovation. The leadership team that initially implemented the mayor’s equity initiative went on to lead the new office — including one individual who became the city’s chief equity officer.

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Executive Order No. 146 — signed by the mayor in June 2020 — established the Mayor’s Office of Social Equity and Innovation to develop and implement policies, programs, regulations, and initiatives related to social equity and racial and social justice.\(^7\)

The order also tasked the office with leading evaluations of city systems, policies, and practices to help “increase social equity and to minimize institutional, structural, and systemic racism in City government.”

As with all city executive orders, this order applies to all city agencies under the mayor, and it remains in effect until a future mayor withdraws it.

Mayoral executive orders do not apply to the city’s 10 independent agencies — such as the Clerk and Recorder’s Office, the Auditor’s Office, and the City Council. They also do not apply to Denver’s five cultural facilities, like the art museum and botanical gardens.

Specifically, Social Equity and Innovation's responsibilities under Executive Order 146 include:

- Developing, managing, and updating a strategic plan.
- Engaging with stakeholders — including agency and program leaders, city employees, community members, and others — to define solutions to eradicate policies and practices that hinder social equity and racial and social justice.
- Collecting, reviewing, and analyzing data to measure the office’s progress toward achieving its goals.
- Providing city agencies with equity tools and resources.
- Helping to implement the city’s equity initiatives.\(^8\)

The executive order also outlines the responsibilities of executive staff appointed by the mayor — such as the 27 executive directors for the agencies under the mayor — in prioritizing equity and racial and social justice. They must each:

- Sign a citywide equity commitment.
- Develop an equity plan for the agency they oversee.
- Engage in “citywide equity scans” administered by the Mayor’s Office of Social Equity and Innovation.
- Participate in learning and development sessions concerning social equity and racial and social justice.
- Support equity teams citywide.\(^9\)


\(^8\) Exec. Order No. 146, City and County of Denver.

\(^9\) Exec. Order No. 146, City and County of Denver.
Furthermore, the executive order establishes three teams to help Social Equity and Innovation achieve its initiatives:

- **THE EQUITY LEADERSHIP TEAM** – Composed of staff in the Mayor's Office of Social Equity and Innovation and a representative of the mayor, this team must establish and implement a social equity work plan, a framework, and an evaluation system to monitor the city's progress toward eliminating inequity and racial and social injustice in the City and County of Denver’s systems, policies, and practices.

- **THE EQUITY CORE COUNCIL** – Organized by the city's chief equity officer, the council includes representatives from various city agencies who work with the equity leadership team to “inform” strategies that help city employees create equitable systems.

- **AGENCY-LEVEL EQUITY, DIVERSITY, AND INCLUSION TEAMS** – Each city agency's executive director selects a group of employees to form their agency's team. The team members review day-to-day activities in their respective agencies to help the city be a more equitable, diverse, and inclusive place to work and support the community.

These teams also are charged with developing agency-specific equity plans — using tools provided by the Mayor's Office of Social Equity and Innovation — that include goals and strategies to eliminate systemic racial and social injustice in city systems, policies, and practices.\(^\text{10}\)

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10 Exec. Order No. 146, City and County of Denver.
Denver’s Equity Programs and Initiatives

The Mayor’s Office of Social Equity and Innovation has several programs and initiatives to fulfill its mandated oversight responsibilities — including providing training opportunities to city staff, engaging the community and key stakeholders, and developing and implementing policies.

Some key activities include:

- **THE RACE AND SOCIAL JUSTICE INITIATIVE IMPLEMENTATION GUIDE** – In 2019, before Social Equity and Innovation was formally established, the city’s equity leadership team developed a “Race and Social Justice Initiative Implementation Guide” to help the city understand the mayor’s initiative and how city agencies and employees would contribute to its success.

  The implementation guide introduced a citywide commitment to equity that agency leaders had to sign, acknowledging their commitment to building an inclusive environment. The guide also proposed workshops and timelines and introduced:

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13 The grant was awarded to the Mayor’s Office of Social Equity and Innovation by Wend II Inc.
FIGURE 2. Mayor’s Office of Social Equity and Innovation Staffing and Budget, 2019-2022

Note: In 2019 and part of 2020, the office was a division in the agency for Human Rights and Community Partnerships.
Source: Auditor’s Office illustration based on information from the city’s 2021 and 2022 annual budgets.

- Key terms and definitions associated with race and social justice.
- The goals of the equity initiative.
- The functions of specific teams.
- The addition of a race and social justice academy.
- A racial equity toolkit for the city.
- Inclusive engagement strategies.

**EQUITY ACTION PLANS** – Social Equity and Innovation implements its mission and initiatives primarily by training city employees on race and social justice and by assisting other city agencies — and their equity, diversity, and inclusion teams — in developing equity action plans.

The agency-level teams use templates provided by the Mayor’s Office of Social Equity and Innovation to develop their action plans. In addition, the office coaches agencies on how to develop specific strategies as part of those plans. For instance, to create an equity action plan, teams:

- Develop strategies to identify and address structural and institutional racism or equity issues.
- Describe the “current state” of those issues, including any policies and practices that may contribute to inequities.
- Describe the “future state” and what an agency hopes to achieve through improvements to its processes after incorporating greater equity.
• Connect strategies to applicable citywide equity goals.
• Develop action steps — including specific time frames and individuals responsible for those tasks.
• Develop measures of success, including applicable data, to determine whether the strategies are working.

• **THE RACE AND SOCIAL JUSTICE ACADEMY** — Social Equity and Innovation leadership developed the Race and Social Justice Academy as a platform to provide all city employees with the knowledge and skills to address racial disparities in city policies, initiatives, budgets, and programs so they can ultimately incorporate equity into the foundations of local government.

The training teaches city employees about key concepts such as racial equity and structural racism and about ways to resolve racial bias in their work and practices. Since it began in 2019, the training has evolved into a four-part course, as described in Figure 3. The Mayor’s Office of Social Equity and Innovation taught these courses to city employees in 2021.

**FIGURE 3. 2021 Race and Social Justice Academy Courses and Descriptions**

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<td>To normalize the conversation about race and social justice; understand and practice common key terms; explore one’s place on the journey toward race equity; and set intentions about what and how each participant’s work ties to the mission, vision, and goals of the city.</td>
<td>To explore how the social construction of race has shaped experiences and be able to recognize and transform racially biased practices and habits. To explore how racial identities have been shaped by various influences and how the social construction of race manifests through various forms.</td>
<td>To develop an awareness of how historic social, political, and legal events and decisions have created racially inequitable outcomes. To focus on how historic events and decisions shaped today’s conditions, specifically in understanding how it shapes the work in the city and the community served.</td>
<td>Building upon the previous three modules, explore approaches, tools, and actions to take when working to dismantle systemic racism in government by examining policies and data and by critiquing and evaluating city systems to advance equity.</td>
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*Source: Auditor’s Office illustration based on information from the Mayor’s Office of Social Equity and Innovation.*

• **DASHBOARDS TO TRACK COMPLETED TRAINING AND EQUITY PLANS** — The office developed two web-based dashboards to track its goals related to the Race and Social Justice Academy and the agency-level equity action plans.
• The training dashboard records how many agencies, divisions, and individuals have completed the academy courses. The office planned to train 2,500 city employees through the Race and Social Justice Academy by the end of 2021. Ultimately, the office plans to train all 13,000 city employees by the end of July 2023.

• The equity plan dashboard tracks finalized agency action plans. It includes plan summaries and the status of implementation for each strategy in an agency’s plan. The office expected to receive 41 equity action plans with 149 strategies by the end of 2021 from all city agencies, including subdivisions of city agencies and the independent agencies.

• **THE BUDGET EQUITY FRAMEWORK** – Working with the city’s Budget and Management Office, Social Equity and Innovation developed a “budget equity guide” to help the city leverage its economic resources and promote equitable outcomes in city programs, initiatives, and citywide services.

As part of addressing “budget equity,” city agencies answer a set of questions to assess how their budgets benefit, burden, or cause unintended consequences to Denver residents — specifically residents of color and other historically marginalized populations.

Budget analysts trained by Social Equity and Innovation work with their assigned agencies to guide them through the budget process when agencies propose changing their budgets. Each agency submits a form to the Budget and Management Office explaining how the requested changes would impact equity. The questions each agency must answer include:

• How does the budget request or adjustment directly benefit or impact one or more historically marginalized communities (e.g., older adults, people with disabilities, or residents of various racial groups that have been historically marginalized)?

• What neighborhoods, city employees, or city services might be most impacted by the request?

• What could be the unintended consequences of the budget adjustment?

• How will the agency mitigate harm and address any concerns?

Once an agency answers those questions, Social Equity and Innovation staff review the information to identify possible equity gaps. Agencies may then need to develop processes to prevent harm and address any unintended consequences that may compound racial inequity for historically marginalized groups.

They can do this by pursuing an “equity mitigation category,” such as:

• Directing economic resources where necessary.

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15 City and County of Denver, “2022 Mayor’s Proposed Budget” (2021).
- Reprioritizing city staff.
- Organizing partnerships with other city agencies to support equitable opportunities.
- Increasing language access and inclusion.
FINDING 1 AND RECOMMENDATIONS

The Mayor’s Office of Social Equity and Innovation Lacks a Detailed Strategic Plan and Other Foundations for Effective Governance

The Mayor’s Office of Social Equity and Innovation does not have the organizational foundation necessary to effectively guide the office in accomplishing its mission and initiatives.

Specifically, it is missing:

- Documentation of its program design.
- A citywide strategic plan that aligns with the executive order that established the office or with other leading practices.
- Formal policies and procedures to guide staff members in their day-to-day work.
- A clear definition of staff members’ roles and responsibilities.

The office lacks these foundations because previous chief equity officers did not prioritize creating them or document their knowledge or vision for future office leadership to do so.

Previous Officials Did Not Sufficiently Document the Office’s Original Program Design

Previous officials did not well document their initial steps to design the Mayor’s Office of Social Equity and Innovation, and the few documents the office could provide us do not include all the necessary components of an effective program design. “Program design” refers to how an organization plans to achieve its goals and use its resources efficiently and effectively.16

To inform how the office was set up, previous officials reportedly researched:

- Municipal equity offices in other cities.
- Preexisting equity initiatives in at least one Denver city agency.
- Guidance from organizations dedicated to race and social equity in government — such as the Government Alliance on Race and Equity, which is a national network of governments.

But current staff could not provide any documentation describing this research or what specifically the previous officials looked for.

Leading practices on program design say when organizations review preexisting programs to address an identified need, they should consider related issues — such as demographic populations, locations, and the magnitude of need for the new program — and they should then document the results.\textsuperscript{17}

The City and County of San Francisco provides an example of how to document research into preexisting programs. We learned San Francisco surveyed 33 cities in the United States and Canada that have an equity office. The city also reviewed reports on addressing racial inequality from leading organizations, interviewed officials in some cities, and documented the results of its work in a report — all before creating its own equity office.\textsuperscript{18}

Specifically, San Francisco’s report examined issues such as government structure, authority, scope of work, staffing, and how offices evaluate their effectiveness. By comparison, the available documentation for the Denver Mayor’s Office of Social Equity and Innovation does not include such important elements of program design.

Leading practices say the first step in program design is to assess how a new government program or office can “best align with and advance existing strategies and high-level directives” and to design the program or office so it can achieve overarching strategies.\textsuperscript{19}

But previous Social Equity and Innovation officials did not design the office to align with preexisting city strategies and directives, such as the mayor’s 2018 equity platform. This platform included a race and social justice initiative to educate city employees to help historically marginalized communities. In a letter from the office’s implementation guide introducing the equity platform, the mayor asked “all City and County of Denver employees” to make the equity platform an “integral part” of their job.

Executive Order No. 146 created the Mayor’s Office of Social Equity and Innovation in 2020, and we learned the office was formed with the mayor’s equity platform in mind. However, city executive orders apply only to agencies and employees under the mayor’s authority — not independent agencies. Therefore, Social Equity and Innovation is inherently limited in achieving the mayor’s goal of “all” city employees incorporating equity into their work.

City staff involved in writing the executive order also said Social Equity and Innovation was not developed in response to any specific need or event — but rather as a result of equity work being done around the country at the

\textsuperscript{17} U.S. Department of State; United Way Greater Toronto.

\textsuperscript{18} City and County of San Francisco Budget and Legislative Analyst’s Office, “Policy Analysis Report” (2019), accessed Dec. 14, 2021, https://static1.squarespace.com/static/5ed18d943016244d3e57260c/t/5ef41eb54ae5a860ec7a5f7d/1593056953282/BLA.OfficeofEquity.050119_0.pdf.

time as well as research into other cities’ equity programs.

The original officials in charge of the Mayor’s Office of Social Equity and Innovation did not formally assess the specific equity issues that Denver’s office would seek to address. According to leading practices, a “needs assessment” would clearly describe the issues to be addressed — and that description should then align with the organization’s goals and objectives and with an analysis of data from various sources to identify the needs of the target population.\(^\text{20}\)

Leading practices further outline the importance of gathering and analyzing data from many sources — using specified data-collection procedures — to allow for effective program monitoring and evaluation.\(^\text{21}\)

A former adviser to the Mayor’s Office of Social Equity and Innovation said tracking city agencies’ individual equity strategies and the office’s own citywide equity indicators would allow the office to eventually identify Denver residents’ needs and address any gaps.

Such equity indicators have not been implemented, and office staff are still developing guidance on how to collect data on race and ethnicity. Without using equity indicators, the office cannot fully monitor and evaluate itself to change and improve its initiatives.

Lastly, playing a part in its inadequate program design, Social Equity and Innovation does not have a complete “logic model” — a tool that documents program activities, allocated resources, results, and expected outcomes.\(^\text{22}\)

The few design documents Social Equity and Innovation did provide us have gaps. For instance:

- They do not include the office’s budget equity review process as an activity.
- They list expected outcomes only for trainings.
- They do not specify allocations for resources, budget, or staff.

The office would have a stronger foundation for effective governance to successfully implement the city’s equity initiatives if it:

- Documented its research into other equity programs and how exactly the office aligns with preexisting citywide strategies.
- Conducted and documented a formal needs assessment.

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• Developed a logic model to specify program activities and allocated resources.
• Created a process to monitor and evaluate its success.

The Office Has No Detailed Strategic Plan or Defined Metrics to Track Progress

The Mayor’s Office of Social Equity and Innovation previously had a one-page strategic framework to outline its general vision, and current leadership replaced that with a new one in January 2022. But as of February 2022, the office has yet to develop a detailed strategic plan that aligns with other relevant strategic plans as required by the city executive order.23

Specifically, both the office’s original and current frameworks lack specific and measurable objectives, detailed implementation strategies, and performance metrics to measure progress. In addition, the office’s mission statement, goals, and strategies are inconsistent across several official documents, which hinders its ability to express a uniformly understood purpose.

MISALIGNMENT WITH EXECUTIVE ORDER AND LEADING PRACTICES – In January 2022, Social Equity and Innovation officials released their latest strategic framework — but this new one-page framework still does not fully comply with the city’s executive order or leading practices for what constitutes an effective strategic plan.

Executive Order No. 146 gives the Mayor’s Office of Social Equity and Innovation the responsibility to “direct and coordinate” the city’s efforts on equity issues and racial and social justice by developing and updating a strategic plan “in coordination and alignment with partner and stakeholder strategic plans.”24 It also says this citywide strategic equity plan should have goals with key performance metrics to track the city’s progress.

But we did not find evidence that the office’s current strategic framework considers other strategic plans, such as those of other city agencies. One office staff member said Social Equity and Innovation could benefit from taking a pause to create a strategic plan and develop the infrastructure it needs to achieve the office’s goals.

Leading practices on strategic planning say an effective strategic plan should include:
• Specific and measurable objectives of the results to be achieved.
• A clearly defined mission statement driving the organization’s goals, strategies, and program activities.

24 Exec. Order No. 146, City and County of Denver.
• Key performance metrics to measure the success of goals, objectives, and program activities.
• An action plan detailing how strategies will be implemented — including the activities to be performed, associated costs, designated responsibilities, and time frames.
• An effective method for analyzing outside factors and stakeholder concerns — such as economic and financial factors, demographic trends, social and cultural trends, and other local, regional, national, and global factors that may affect the organization’s ability to achieve its mission and goals.

Social Equity and Innovation’s one-page frameworks lack these components.

For comparison, we reviewed the Denver Department of Public Health and Environment’s climate action plan and found it incorporates several aspects of a successful strategic plan that align with the above leading practices.26 The Mayor’s Office of Social Equity and Innovation could use this as an example and incorporate similar components of this plan — as well as consider leading practices and Executive Order No. 146 — when developing its own strategic plan.

**INCONSISTENT MISSION, GOALS, AND STRATEGIES** – Meanwhile, the Mayor’s Office of Social Equity and Innovation is not consistent in its stated mission, goals, and strategies.

Leading practices say an effective strategic plan should agree on a small number of broad goals that address the most critical issues and the plan should have specific strategies to achieve those broad goals.27 Guidance on program design also says a clear mission and objectives as well as consistent plans are necessary for an effective program.28

We found six different mission statements across various sources — including the office’s two strategic frameworks, the executive order that established the office, the city budgets for both 2021 and 2022, and other planning documents.

The office’s mission statement as of January 2022 says: “We utilize best and innovative practices to lead Denver in transformative change with a commitment to equitable outcomes.” However, Executive Order No. 146 — which established Social Equity and Innovation — says the office “will oversee the city’s commitment to social equity and race and social justice” and “increase social equity and to minimize institutional, structural, and

systemic racism in City government.”

The office’s goals and strategies similarly differed across its two frameworks and other documents.

While most of the goals we examined aligned with the five goals outlined in Social Equity and Innovation’s original strategic framework, many of its early documents are missing the fifth goal of Denver being “antiracist in our thoughts, actions, and policy decisions.” The office’s newest framework, released in January 2022, introduced four entirely new goals that are also inconsistent with the office’s previous ones. Leading practices are clear that such details should be expressed consistently to ensure effective governance.

Meanwhile, the office’s overall strategies from its original framework are inconsistent with strategies listed in every other document, and Social Equity and Innovation’s most recent framework does not have any strategies at all.

**LACK OF PERFORMANCE METRICS** – Neither of the Mayor’s Office of Social Equity and Innovation’s one-page strategic frameworks included performance metrics to collect and analyze data that would measure the office’s progress in achieving its goals, in line with Executive Order 146.

The executive order specifically gives the office the responsibility to collect and analyze data to measure progress on the city’s efforts related to equity, race, and social justice using an equity dashboard and performance metrics associated with goals in a “citywide strategic plan.”

Social Equity and Innovation does track two metrics:

- Agency-specific strategies from agencies’ own racial equity action plans.
- The number of city employees the office has trained in the Race and Social Justice Academy.

But these measures do not stem from goals in any citywide strategic equity plan because none exists.

And it is not clear how these two metrics align with the goals in the office’s one-page strategic framework. The framework lists only general goals related to being an inclusive employer, being an inclusive city by integrating equity into policies and programs, and engaging with the community.

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Instead, Social Equity and Innovation’s measurements for agencies’ racial equity action plans and the number of city employees trained align with goals expressed in the mayor’s 2022 budget. The budget said the office aimed to train 2,500 employees and to receive 41 racial equity action plans with 149 strategies by the end of 2021.33

Because these goals were not included in any strategic plan, Social Equity and Innovation staff members said they did not know about the office’s training goal that was published in the 2022 city budget.

Leading practices say a detailed strategic plan should outline specific and measurable objectives, detailed implementation strategies, and performance metrics — including specific information on training goals and how the office will achieve them.34 Performance metrics are an important part of any strategic plan because they link goals and strategies to the program’s activities. Performance metrics also show whether the program is fulfilling its objectives.

The city partnered with the University of California at Berkeley to develop a series of equity indicators, which were designed to measure and improve racial equity in the City and County of Denver by focusing on:

- The economy.
- Public health and the environment.
- Public safety and criminal justice.
- Transportation and mobility.
- Education.
- Housing and neighborhoods.

But Social Equity and Innovation has not been able to use any of these indicators to measure the city’s progress on equity because it lacks the supervisory staff needed to get them approved for use. However, neither previous nor current Social Equity and Innovation leadership has assessed whether the office has the staff and resources it needs to do its work.

Leading practices for program design say that assessing a program’s “inputs” — like staff and budget resources — is an essential part of implementing a program.35

Without a comprehensive and detailed strategic plan that includes a consistent mission, goals, strategies, and performance indicators, the Mayor’s Office of Social Equity and Innovation cannot effectively...

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communicate and carry out its responsibilities as required by the executive order. In addition, the office will not be able to determine whether its initiatives are successfully achieving its goal to be an inclusive city that “integrates social equity, race, and social justice” into its policies and programs.\textsuperscript{36}

\textbf{The Office Has Not Clearly Defined the Roles, Responsibilities, and Day-to-Day Tasks of Its Staff or Members of Other Agencies’ Equity, Diversity, and Inclusion Teams}

Social Equity and Innovation staff members said they do not have many formal documents or policies and procedures to guide their day-to-day work outside what Executive Order No. 146 says. The newest chief equity officer — who assumed their role in October 2021 — told us they began updating and documenting the office’s policies and procedures, but this work is incomplete as of January 2022.

Instead, to guide their work, office staff members said they use the signed equity commitments from other agencies’ leaders, informal guidance from presentations, and implementation plans that were developed before the executive order was signed. They often rely on the “vision” and experience of their more tenured colleagues, as well as their own “emotional intelligence,” to accomplish the day-to-day work of the office.

Some office staff members also said their roles and responsibilities are “difficult to differentiate” from their colleagues. They said when previous chief equity officers left the city, staff members frequently performed duties outside their individual job descriptions. And as it was, the office had only a few staff members — most of whom had been with the office for less than six months.

This absence of clearly defined roles and responsibilities after previous leadership left the city led to some tension and confusion between new and existing staff members when some staff members suggested changes to preexisting projects, like the Race and Social Justice Academy.

The current chief equity officer said staff members were given job descriptions before they were hired. However, job descriptions do not detail the specific tasks staff must complete on a day-to-day basis to fulfill their job duties.

In addition, the current chief equity officer said staff were provided an implementation plan outlining their tasks to redesign the Race and Social Justice Academy. While the implementation plan does specify tasks for each staff member related to redesigning the academy, the plan provides specific duties for office staff only from June 21, 2021, through Aug. 23, 2021. We noted many of the tasks were assigned to all staff members without differentiating who would perform which part of an activity.

We also reviewed an implementation plan containing specific tasks to guide agencies with their equity action plans from June 21, 2021, through July 30, 2021. We were not given any additional documentation related to staff’s day-to-day roles and responsibilities after August 2021. We also did not receive any documentation related to other tasks staff told us they were involved in, such as the budget equity process.

Based on our interviews with staff in September and October 2021, these documents were not enough to guide them in their day-to-day work. As previously stated, most of Social Equity and Innovation’s staff joined the office in June 2021, and at the time of our interviews, some staff who were assigned duties according to the implementation plans were no longer with the office.

Meanwhile, Social Equity and Innovation also does not have policies, procedures, or defined roles and responsibilities for employees in other city agencies who work on equity issues — such as the members of each agency’s equity, diversity, and inclusion team.

A leader of one agency team we surveyed said their agency’s team did not receive communication or guidance on their roles and responsibilities. Social Equity and Innovation staff members confirmed this by saying members of agencies’ equity, diversity, and inclusion teams received no formal training and are not provided guidance outside the coaching they may get from the office’s trainers and strategists.

However, after we shared a draft of this report with Social Equity and Innovation, the current chief equity officer provided us with some training documentation. This new documentation included meeting invites, agendas, and a presentation given to equity, diversity, and inclusion teams beginning in 2019. The documentation also showed Social Equity and Innovation staff sent a quarterly update with instructions for how to complete agency equity action plans, and they also sent an email to equity, diversity, and inclusion teams introducing them to the newest members of the office in July 2021.

But we did not receive evidence of any trainings for agency equity, diversity, and inclusion team members from July 2021 until March 2022, when documentation showed a virtual quarterly meeting was scheduled.

There is a disconnect between what the recently provided documentation now shows us about the trainings the office held and what the responses to our survey told us in January 2022 about what the equity, diversity, and inclusion team members felt they knew at that time. Some team members said then they had not received any written communication and that verbal trainings were not enough to fully understand their roles and responsibilities.

This issue is complicated by other city agencies hiring their own staff dedicated to equity, which Social Equity and Innovation staff say makes it more challenging to align all city agencies in a uniform, citywide approach.
Federal guidance says managers should document processes in formal policies — including how they should be implemented — and managers should further define those policies with day-to-day procedures.\(^{37}\)

Additionally, managers should define and assign responsibilities to key roles to achieve the organization’s objectives.\(^{38}\) They should also have succession and contingency plans to reassign responsibilities and minimize interruptions when a key staff member leaves.\(^{39}\)

By Social Equity and Innovation clearly documenting roles and responsibilities in formal policies and procedures in alignment with leading practices, its own staff — both current and future — as well as members of other city agencies’ equity, diversity, and inclusion teams will have clear guidance to do their work.

**Previous Officials Did Not Prioritize Program Design or Sufficiently Transfer Their Knowledge to Current Leadership**

All these issues — the lack of documented program design, the absence of formal policies and procedures, and the undefined roles and responsibilities for staff — occurred because previous office leaders did not prioritize creating them and did not document their knowledge or vision for the office before leaving their position.

Office staff members said previous leaders would often conduct business “informally” and would not document meetings with other city agencies or share that information with other office personnel. They also did not prioritize creating a strategic plan to document their vision for the office to ensure they passed on key knowledge to future leadership.

When those officials left the city, Social Equity and Innovation then lost organizational knowledge, including the office’s original vision.

Before leaving in September 2021, the interim chief equity officer told us the COVID-19 pandemic delayed some of the office’s initiatives while they examined the pandemic’s impact on underserved communities.

For example, we learned that during the height of the pandemic, Social Equity and Innovation’s previous leadership met weekly with community members to obtain feedback about the effects of the pandemic on marginalized communities related to testing and vaccines. Additionally, between March 2020 and April 2021, two-thirds of the office’s staff — including the office’s leadership — participated in the city Emergency Operations Center’s response to the pandemic and its response to the protests against the killing of George Floyd.


Because of this pandemic-related work, the interim chief equity officer left it to the office’s next leaders to be responsible for creating a strategic plan.

Although the pandemic did cause delays in the agency’s work beginning in March 2020, discussions and planning for the Mayor’s Office of Social Equity and Innovation had been underway for nearly three years by that time — beginning with the recommendation in early June 2017 for the city’s race and social justice initiative.

Guidance on program design says the first step in creating a new program is to assess the specific strategic goals and objectives the program could achieve and then to design the program to achieve them.\(^{40}\) Leading practices for strategic planning also say government agencies should use a strategic plan to provide a long-term perspective on services and budgeting as well as to allow leaders to fulfill the agency’s mission and meet their mandates.\(^{41}\)

Federal guidance emphasizes the need to retain institutional knowledge and reduce the risk of knowledge being limited to only a few personnel.\(^{42}\) When management develops and maintains documentation, this then provides managers with a means to communicate key knowledge to others.

We recognize the impact the pandemic had on the previous leadership’s ability to prioritize the office’s design, and we recognize the importance of their role in the Emergency Operations Center.

However, because the city’s equity initiatives did not begin with a well-documented program design and other foundations for effective governance before the pandemic, Executive Order No. 146 — which formalized the Mayor’s Office of Social Equity and Innovation in 2020 and established its responsibilities — is often unclear. It also does not provide the office with sufficient authority to accomplish its responsibilities under the executive order, as we will discuss in greater detail in Finding 2.


1.1 RECOMMENDATION  Review and Update Existing Program Design

Consulting leading practices, the Mayor’s Office of Social Equity and Innovation should review and update its existing program design and then document all elements of the office — including:

- How it aligns with both Executive Order No. 146 and other citywide goals and priorities.
- Its specific goals and strategies.
- A logic model specifying office activities, staffing, resources, results, and expected outcomes.
- How it plans to monitor and evaluate the success of the office’s programs and initiatives.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 23, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.
SEE PAGE 52 FOR THE AUDITOR’S ADDENDUM.

1.2 RECOMMENDATION  Assess Needs the Office Should Address

While reviewing and updating its program design as part of Recommendation 1.1, the Mayor’s Office of Social Equity and Innovation should conduct a formal, documented needs assessment of the office and its initiatives to ensure it meets identified needs in the city. This assessment should include a clear description of the issues the office wants to address and how each issue aligns with the office’s goals and strategies as well as Executive Order No. 146.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 23, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.
1.3 RECOMMENDATION Develop and Document a Strategic Plan

The Mayor’s Office of Social Equity and Innovation should develop and document a strategic plan that aligns with Executive Order No. 146, stakeholders’ strategic plans, and leading practices. At a minimum, the plan should include:

- Specific and measurable objectives.
- A clearly defined mission statement.
- Key performance metrics.
- An action plan detailing how strategies will be implemented — including specific activities, associated costs, designated responsibilities, and time frames.
- An effective method for analyzing outside factors and stakeholder concerns.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 23, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.

1.4 RECOMMENDATION Ensure Consistent Mission, Goals, and Strategies

The Mayor’s Office of Social Equity and Innovation should ensure its mission, goals, and strategies are consistent across Executive Order No. 146, all strategic planning documents, and all office communications.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 8, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.

1.5 RECOMMENDATION Document Policies and Procedures

The Mayor’s Office of Social Equity and Innovation should document comprehensive policies and procedures to ensure office staff and members of other agencies’ equity, diversity, and inclusion teams properly implement the office’s programs and initiatives. The policies and procedures should define key roles and responsibilities for individual staff to ensure institutional knowledge is retained.

Once approved, the policies and procedures should be communicated to office staff and members of other agencies’ equity, diversity, and inclusion teams. In addition, the office should develop and document a process to periodically evaluate these policies and procedures and revise them as necessary.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – SEPT. 23, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.
1.6 RECOMMENDATION  Develop and Document Succession and Contingency Plans

As the Mayor’s Office of Social Equity and Innovation documents roles and responsibilities through Recommendation 1.5, it should develop and document a succession and contingency plan to reassign responsibilities and minimize interruptions when a key staff member leaves.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – SEPT. 23, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.
SEE PAGE 52 FOR THE AUDITOR’S ADDENDUM.

1.7 RECOMMENDATION  Implement Performance Metrics

As the Mayor’s Office of Social Equity and Innovation develops and documents key performance metrics through Recommendation 1.3, it should implement them to track the success of the city’s social equity and race and social justice efforts. The office should ensure these metrics align with its goals, strategies, and objectives.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 23, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.

1.8 RECOMMENDATION  Identify Agency-Specific Equity Personnel

The Mayor’s Office of Social Equity and Innovation should develop and document a process to identify agencies with their own equity staff members to ensure those individuals receive and communicate information consistent with citywide initiatives. The office should also work with these agency-specific personnel to develop clear roles and responsibilities that align with citywide equity initiatives.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 8, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.
FINDING 2 AND RECOMMENDATIONS

The Executive Order Establishing the Mayor’s Office of Social Equity and Innovation Provides Insufficient Clarity to Empower Staff

Because the Mayor’s Office of Social Equity and Innovation does not have the foundations for effective governance and lacks sufficient support, it cannot ensure city agencies comply with the executive order that formalizes the city’s efforts to address social inequity and racial and social injustice in the City and County of Denver.

Executive Order No. 146 does not give Social Equity and Innovation clear authority to successfully carry out its oversight duties. It is also not detailed enough, in that it does not define:

- The office’s authority to enforce the order’s requirements for other city agencies to support the city’s equity initiatives.
- The office’s or other city agencies’ roles in the budget equity process.
- What “citywide equity scans” are.

Furthermore, the longevity of the city’s equity initiatives is at risk, because executive orders can be easily revoked by future mayors.

Without resolving these issues, Social Equity and Innovation cannot ensure it will fulfill its responsibilities under Executive Order 146 — and more importantly, it is limited in how well and thoroughly it can achieve the mayor’s mission to “increase social equity and to minimize institutional, structural, and systemic racism in City government.”

WHAT IS EXECUTIVE ORDER NO. 146?

Mayor Michael B. Hancock signed Executive Order No. 146 in June 2020. It established the Mayor’s Office of Social Equity and Innovation to develop and implement policies, programs, regulations, and initiatives related to social equity and racial and social justice.

The order also tasked the office with leading evaluations of city systems, policies, and practices to help “increase social equity and to minimize institutional, structural, and systemic racism in City government.”

As with all city executive orders, this order applies to all city agencies under the mayor, and it remains in effect until a future mayor withdraws it.

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Executive Order No. 146 Is Vague about the Office’s Authority to Enforce Requirements for City Agencies

Executive Order No. 146 requires all mayoral appointees — and the agencies they oversee — to cooperate with the Mayor’s Office of Social Equity and Innovation to achieve the goals and responsibilities established in the order.\(^{44}\) Meanwhile, another executive order requires all city agencies under the mayor to follow every executive order, warning that “failure to comply with any executive order may lead to disciplinary action.”\(^{45}\)

Despite those declarations, Social Equity and Innovation staff said the office does not have formal power to get agencies to comply with Executive Order 146 — such as agencies’ responsibilities to create racial equity action plans and participate in equity training.

To encourage compliance, Social Equity and Innovation staff remind mayoral agencies of the mayor’s equity priorities in the executive order, but staff members said some city agencies have “stonewalled” them when they set deadlines to turn in racial equity action plans. Staff also said it is “not difficult” for agencies to ignore them if an agency does not like the coaching the office provides.

Some other cities’ equity offices do have authority to enforce their initiatives, as we learned in reviewing the processes of five other cities and, in some cases, also speaking with their staff. Notably:

- Three equity offices — Portland, Oregon; San Francisco; and Boston — had some form of enforcement power.
- San Francisco and Boston could impact or freeze agencies’ budgets for not complying with equity initiatives.
- Portland, Oregon made equity considerations a part of all city employees’ job descriptions and performance evaluations.

Staff from Denver’s City Attorney’s Office who reviewed the draft of Executive Order 146 before it was signed said the order was likely intentionally designed to not give the Mayor’s Office of Social Equity and Innovation enforcement authority. In this way, the office could determine how it would work with other city agencies.

But federal standards stress that organizations need to have a structure that enables them to plan, execute control, and assess how well they achieve their objectives. Standards also say management should determine the level of authority necessary to fulfill a responsibility and

\(^{44}\) Exec. Order No. 146, City and County of Denver.

Several city agencies are not complying with their responsibilities under Executive Order No. 146. Because Social Equity and Innovation lacks stronger enforcement authority, several city agencies are not complying with their responsibilities under Executive Order No. 146. Specifically, they are not completing:

- Signed citywide equity commitments.
- Agency-level equity plans with goals and strategies to eliminate inequity.
- Training on social equity, race, and social justice.

**INCOMPLETE EQUITY COMMITMENTS** – Not all city staff appointed by the mayor have given Social Equity and Innovation signed equity commitments. In February 2019, Mayor Michael B. Hancock asked all mayoral appointees, including each city agency’s executive director, to sign an equity commitment to show their support of his initiative to address racial disparities and inequities in Denver’s historically marginalized communities.

In 2020, Executive Order No. 146 then required mayoral appointees to affirm their commitment to prioritizing equity and social justice by signing a citywide equity commitment.

But when we asked Social Equity and Innovation for the most recent equity commitments agency leaders had signed, the office was able to provide us with only a list because they lacked available staff to scan the physical copies. The list detailed the 24 commitments they had on file — some of which were from multiple divisions within the same agency. The list did not include at least six large agencies under the mayor, indicating these agencies did not have any equity commitments on file.

Additionally, the list had outdated names for some city agencies, suggesting these commitments were not recently updated or signed by the current leadership overseeing those agencies.

**INCOMPLETE RACIAL EQUITY ACTION PLANS** – Executive Order 146 also requires mayoral appointees to develop agency-level racial equity action plans. According to Social Equity and Innovation’s goals in the city’s proposed budget for 2022, the office’s staff expected to receive 41 plans by the end of 2021, which was to include all city agencies and independent agencies. Some agencies chose to develop plans for their divisions also.

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48 Exec. Order No. 146, City and County of Denver.
49 Exec. Order No. 146, City and County of Denver.
However, only nine agencies under the mayor have finalized a racial equity action plan with specific strategies posted on the Mayor’s Office of Social Equity and Innovation’s dashboard as of January 2022.

Social Equity and Innovation staff said they did receive 11 other plans, but those are incomplete, as of January 2022. The office puts the equity plans on its dashboard only once they are finalized. We also noted the dashboard included four other racial equity action plans from independent agencies, although they were not required to develop them because independent agencies are not subject to mayoral executive orders.

**INCOMPLETE TRAINING** – The Race and Social Justice Academy is Social Equity and Innovation’s main way of educating city employees about social equity issues. While the office has made progress toward training city employees, only about 1,400 of over 13,000 city employees in all — or about 11% — are fully trained in the Race and Social Justice Academy, as of January 2022.

Executive Order 146 is clear about the responsibilities of mayoral appointees to participate in training on social equity and racial and social justice.\(^1\) And again, the city’s Executive Order No. 1 warns that failing to comply with an executive order can lead to disciplinary action.\(^2\)

Despite this, some Social Equity and Innovation staff expressed hesitancy to mandate the Race and Social Justice Academy training because of “potential liabilities.” Staff did not share specific examples of what these liabilities could be.

Staff in the City Attorney’s Office said they were unaware of any conversations about such concerns. They said requiring the Race and Social Justice Academy training — or any similar equity trainings — would be no different than any other city-mandated training around creating a respectful workplace, such as sexual harassment or bullying.

In feedback from five equity, diversity, and inclusion team members from various city agencies, one team member told us they were unclear about whether their staff is required to participate in the equity training offered by Social Equity and Innovation.

Social Equity and Innovation staff members said they were also concerned about pushback they received from some agencies when using the word “mandate.”

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Staff members said they try to build support by tailoring their message to emphasize the importance of the training and by communicating “togetherness.” Staff members said they feel this approach is more effective than requiring training, and they said some agency leaders have communicated the expectation to their staff that they attend the training.

But this approach contrasts with several other cities we spoke to that have similar racial equity offices. Three cities — Seattle; Boston; and Portland, Oregon — require equity training. Similar to Denver’s situation, Seattle and Boston’s executive orders do not apply to independent agencies.

The Government Alliance on Race and Equity emphasizes organizations must invest in achieving a common understanding among their employees — either voluntarily or by mandate — about the organization’s equity goals and its strategies to achieve them.53

The Mayor’s Office of Social Equity and Innovation is further limited in training more city staff because the only method for providing the academy is through sessions Social Equity and Innovation staff members teach. While office staff members said they would like to offer the training through other methods — such as during orientation for new employees — they have not talked with the Office of Human Resources.

Social Equity and Innovation staff agree more ways to offer the academy training would increase the office’s chances of training more city employees, in line with its goals.

Without sufficient enforcement authority, though, the Mayor’s Office of Social Equity and Innovation cannot ensure city agencies will comply with the mayor’s racial and social justice equity initiatives or that they will sufficiently support the office’s mission to increase social equity and to minimize institutional, structural, and systemic racism in the city.54

The Office Lacks Sufficient Support to Ensure Other Agencies’ Comply with Executive Order No. 146

The Mayor’s Office of Social Equity and Innovation cannot get all mayoral agencies to fully comply with the executive order — or gain clarity in its own responsibilities — because it did not have sufficient support from its own leadership or the Mayor’s Office.

Specifically, the office has not had consistent leadership to communicate its needs because both its original chief equity officer and the interim replacement left the city between June 2021 and September 2021. As discussed, prior leaders often conducted business “informally” without sharing that information with other office personnel. In addition, the office did not have sufficient support from the Mayor’s Office during


these leadership transitions to ensure Social Equity and Innovation could successfully implement the city's equity initiatives.

The Mayor's Office supported Social Equity and Innovation and its goals when the platform was first developed. For instance, throughout 2019 and early 2020, the mayor promoted the race and social justice initiative to educate city employees as a part of his citywide equity platform. The mayor also attended public presentations with city leaders to receive input and raise awareness for Social Equity and Innovation, and he attended meetings educating city agencies about the office's work.

When we spoke with Social Equity and Innovation staff in September 2021 — when the office was between chief equity officers — staff said they needed more support to compel uncooperative city agencies to comply with the city's equity initiatives and their responsibilities under Executive Order 146. As discussed, they report having been “stonewalled” by some city agencies and said it is otherwise “not difficult” for agencies to ignore the office.

The Social Equity and Innovation staff who identified agencies' noncompliance had only been in their positions three months before the interim chief equity officer left the city in September 2021. In that absence of leadership, office staff said they have not “leaned in” to the mayor's support for equity work to try to persuade agencies to comply, rather they reiterate to mayoral agencies that equity is a priority of the mayor.

The executive order says the Mayor’s Office is responsible for overseeing Social Equity and Innovation.55 Staff in the Mayor’s Office said they were not aware of Social Equity and Innovation requesting help to gain agencies’ compliance nor was the Mayor’s Office aware of any conversations about the Mayor’s Office needing to be more involved in getting agencies to comply.

Mayor’s Office staff also said the responsibility to enforce compliance on other agencies often depends on the current executive in charge of an office. However, Social Equity and Innovation did not have consistent leadership, and the Mayor’s Office could have taken a more active oversight role to ensure Social Equity and Innovation continued to successfully operate until a new chief equity officer was appointed.

Federal guidance says an oversight body — in Denver’s case, the Mayor’s Office — should lead by example to demonstrate the organization’s “values, philosophy, and operating style.” Furthermore, the oversight body sets the “tone at the top,” which is fundamental to the effectiveness of a program.56

Relatedly, the Government Alliance on Race and Equity says when leaders set expectations, it is key for them to create an environment that supports change.\(^{57}\) The alliance also says cities with a strong-mayor form of government — like Denver — have an advantage to “use the power and voice of the executive to make racial equity a jurisdiction-wide priority.”

As mentioned, Executive Order No. 146 requires all mayoral appointees to cooperate with the Mayor’s Office of Social Equity and Innovation, which is supported by another executive order that requires mayoral agencies to follow every executive order. This other executive order warns that failure to comply with any executive order may lead to disciplinary action.”\(^{58}\)

While executive orders should be enough for mayoral agencies to comply, additional input and support from the mayor may have helped reinforce to city agencies their obligation to comply with executive order requirements. Without consistent office leadership and without adequate support from the Mayor’s Office, Social Equity and Innovation cannot ensure city agencies will wholly comply with the city’s racial and social justice equity initiatives or support “the city’s commitment to social equity and race and social justice.”\(^{59}\)

**A Future Mayor Could Revoke Executive Order No. 146, Risking the City’s Progress in Advancing Social Equity and Racial and Social Justice**

The Mayor’s Office of Social Equity and Innovation and its achievements could be undone by a future mayor if that elected official revoked Executive Order No. 146. Executive orders remain in effect until canceled by the mayor.\(^{60}\) Because they can be easily revoked, they lack the longevity of city ordinance.

A former adviser who helped write Executive Order 146 said that risk is largely why original leaders of Social Equity and Innovation hoped to codify the policy in city ordinance after the executive order was signed. During the office’s development, previous office leaders told the City Council they wanted to codify the office through city ordinance in 2021, and the Mayor’s Office confirmed it intended to begin with the executive order and consider codifying the office in ordinance at a later date.

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\(^{59}\) Exec. Order No. 146, City and County of Denver (2020).

As of January 2022, neither Social Equity and Innovation nor the Mayor’s Office has taken action to follow through on the latter part of those intentions.

Changing city ordinance is more difficult than changing an executive order, because it requires getting the City Council’s approval through a designated process and formal vote — whereas an executive order needs only the mayor’s signature. Because of that, executive orders are “relatively easy to change or rescind,” according to guidance from Mayor’s Office staff.

The guidance notes that an office created by a rescinded executive order is not always folded into another city agency. Therefore, if a future mayor rescinds Executive Order No. 146, there is no guarantee Social Equity and Innovation would continue operating as its own office or that it would be placed under another agency’s purview.

As we were learning about other cities’ equity offices, we found that Portland, Oregon; Austin, Texas; and San Francisco all codified their equity offices in city ordinance — which carries more permanence than an executive order.

Notably, among the two other cities we looked at that did not have their office codified in an ordinance, Seattle — which has had an equity office under an executive order for over 18 years — is considering doing so to ensure its work continues no matter who is mayor.

If the Denver Mayor’s Office of Social Equity and Innovation continues to exist only by executive order, it risks being more easily undone by future administrations — which could impair the city’s efforts to make Denver “an inclusive city that integrates social equity, race, and social justice into policies, practices, programs, and budgetary decisions.”

**Vague Wording in Executive Order No. 146 Further Impedes the Mayor’s Office of Social Equity and Innovation’s Ability to Fulfill Its Role**

In addition to Executive Order No. 146 lacking sufficient detail about the Mayor’s Office of Social Equity and Innovation’s authority to enforce requirements of other city agencies, the executive order is vague in two other notable areas:

- Its discussion of the budget equity process.
- Its requirement for “citywide equity scans.”

**Roles Not Defined for the Budget Equity Process** — Since 2019, the “budget equity process” requires Denver’s city agencies to consider and address matters of equity in all budget proposals. When we spoke to Social Equity and Innovation staff members about their role in this process, we received varying perspectives about the office’s involvement.

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Executive Order 146 does not define the office’s role in the budget equity process, nor the roles of other city agencies. The office also has no policies and procedures documenting how its staff should be involved, and it does not have a process to identify new budget staff in other city agencies to ensure they can be properly trained on the budget equity process.

Federal standards stress the importance of a “tone at the top” and how it is “fundamental” to effective governance. But this lack of clarity in Denver’s executive order creates several risks:

- **UNCLEAR RESPONSIBILITIES** – Neither the Mayor’s Office of Social Equity and Innovation nor the city’s Budget and Management Office have a consistent understanding about Social Equity and Innovation’s roles and responsibilities in the city’s budget equity process. Executive Order 146 says only that the office “shall have oversight on matters of … investment.”

When we asked office staff members about their role in this process, one staff member said they reviewed agency budgets only during presentations to the city’s chief financial officer and they provided feedback on language. Another individual said their involvement began early and included reviewing each line-item in an agency’s budget. Staff members in the budget office said Social Equity and Innovation trained their budget analysts to ensure they had an adequate understanding of the equity questions to ask regarding agencies’ budgets. But the extent of Social Equity and Innovation’s involvement in this training is unclear and not documented.

In addition to the executive order’s vague wording, Social Equity and Innovation has no policies and procedures for the budget equity process — along with lacking policies and procedures for other day-to-day tasks as we discussed in Finding 1. Such policies and procedures would ideally define staff members’ roles and responsibilities related to:

- Training city employees about the budget equity process.
- Reviewing and providing feedback on agencies’ budget proposals.
- When the office should be involved.
- How it should work with the Budget and Management Office.

The city’s budget equity guide mentions Social Equity and Innovation training budget analysts and identifying equity gaps in agencies’...
budget proposals. But these statements are not detailed enough. Federal standards say effective documentation establishes the “who, what, when, where, and why” of how staff should perform a task. Policies and procedures also should define key roles, day-to-day activities, and when those activities should happen.\(^{64}\)

**UNCLEAR AUTHORITY** – Another concern impacting the effectiveness of the budget equity process is that, according to Social Equity and Innovation staff, city agencies are not required to consult with the office about their budgets. Because Executive Order 146 has no specific information about the budget equity process, it hinders the office’s ability to hold other city agencies accountable for participating in the process and agencies similarly do not have clear direction about their participation.\(^{65}\)

In reviewing five other cities’ equity offices for comparison, we found three cities that codify a budget review process in either city ordinance or executive order: Boston; San Francisco; and Austin, Texas. All three cities also developed an equity assessment for their city agencies to determine the impact their budgets have on communities of color and other marginalized populations. While Denver incorporated an equity assessment for agencies to use, it has not codified the budget equity process.

Federal standards say processes cannot be effective if they were not designed and implemented properly. In addition, a process cannot be effective if the individuals performing it do not possess the necessary authority or knowledge.\(^{66}\)

**UNCLEAR STAFFING AND RESOURCE NEEDS** – Social Equity and Innovation staff members said that while their participation in the budget equity process has increased in the past two years, they desire a greater role to increase their impact and ensure more equity. Although the office hired more staff at the end of 2021, the office has not assessed its staffing or resources to determine whether it has the capacity for the greater role it desires in the budget equity process.

The Government Alliance on Race and Equity says organizations can increase the likely impact of racial equity efforts when staff are included in budget proposals as early as possible.\(^{67}\) But leading practices on program design also stress the importance of assessing the organization’s capabilities — such as what financial resources are available to staff.
available, what staff are available, what skills are required, and what time staff have available to dedicate to a process or program.\(^{68}\)

- **LACK OF COORDINATION TO IDENTIFY TRAINING NEEDS** – Lastly, the Mayor’s Office of Social Equity and Innovation does not have a process to work with the Budget and Management Office in identifying which new city employees need to be trained on the budget equity process.

To gauge city employees’ experiences working with Social Equity and Innovation on the budget equity process, we used our professional judgment in surveying nine budget employees from eight city agencies.

Among the five responses we received, one agency’s employee said they were new to their position and had not received any training or guidance from the office about the budget equity process, while another employee from the same agency said they did receive guidance. The remaining three city employees who responded to us said they did receive guidance from Social Equity and Innovation and it was helpful.

Staff in the Budget and Management Office noted that challenges occur when agencies change leadership. New managers need to be brought up to speed about an agency’s plans and they may not have received equity training from the Mayor’s Office of Social Equity and Innovation.

Federal standards say managers should not only define contingency plans to reassign responsibilities when someone leaves without notice, but managers should also implement processes to enable “knowledge sharing” with the new individuals in the role.\(^{69}\)

Additionally, these leading practices say effective programs should be designed using a collaborative approach with input from all relevant stakeholders. Effective programs also should have well-trained and committed staff.\(^{70}\)

In other words, to ensure maximum effectiveness of the budget equity process, city staff who are new to their roles should be identified and properly trained in a timely manner.

Without clarity on various city employees’ roles and responsibilities in the budget equity process, the city cannot ensure its budget proposals do not create unintended consequences for Denver residents, specifically residents of color and other historically marginalized populations.

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Office staff were either unaware of the “equity scans” or were uncertain what an equity scan is supposed to be.

‘CITYWIDE EQUITY SCANS’ NOT DEFINED – The office does not conduct “citywide equity scans” as required by Executive Order No. 146 because staff were either unaware of them or uncertain of what an equity scan is supposed to be.71

The executive order says every city agency must “participate in citywide equity scans to be administered by the [Mayor’s Office of Social Equity and Innovation] on a calendar basis” — but the executive order does not define what an equity scan is.

The equity commitments each mayoral appointee is supposed to sign also reference equity scans — saying the scans are meant to “establish a baseline of current [equity, diversity, and inclusion]-related efforts” in agencies. But the commitments do not specify how these scans should be conducted.

When we asked a Social Equity and Innovation staff member what role they played in conducting equity scans, they said the term equity scans “does not compute” with any projects the office has done so far — but they said it could refer to the office’s efforts to develop citywide equity indicators.

Another staff member responsible for developing the indicators was also unaware of what the executive order meant. They said equity scans could refer to when the office consults with other agencies about their projects to incorporate equity. When we talked to this same staff member again, they then said equity scans referred to how the office coaches other city agencies about their racial equity action plans.

A former adviser for Social Equity and Innovation who helped draft Executive Order 146 said the order needs to be updated to reflect the office’s current processes — noting many of the office’s responsibilities have evolved over time. The former adviser said the equity scans refer to what are now the creation of agency-level racial equity action plans and the Mayor’s Office of Social Equity and Innovation’s efforts to track those strategies in its dashboard.

However, the executive order refers to the dashboard as a “visual representation of key performance indicators” measured against the office’s goals in its strategic equity plan — which are clearly defined as being separate from citywide equity scans.72

After we shared a draft of this report with the Mayor’s Office of Social Equity and Innovation, officials provided additional documentation that describes evolving intentions for the citywide equity scans. Figure 4 on the next page outlines the timeline of officials’ discussions regarding a citywide equity scan.


72 Exec. Order No. 146, City and County of Denver (2020).
FIGURE 4. Timeline of Discussions about Citywide Equity Scans

February 2019
The National League of Cities and the Government Alliance on Race and Equity propose the scope of services for Denver’s race and equity initiatives.

November 2019
The city signs a contract with the National League of Cities to provide services, including an assessment and a survey of staff.

January 2020
Social Equity and Innovation leadership meets with representatives from the University of California at Berkeley and the Government Alliance on Race and Equity to discuss the citywide scans.

June 2020
Executive Order No. 146 takes effect.

2019

2020

December 2019
The Mayor’s Office of Social Equity and Innovation’s leadership begins discussions about conducting citywide equity scans.

March 2020
City and County of Denver offices close due to the COVID-19 pandemic.

April 2020
The focus of the citywide scans shift to a “COVID-19 employee inclusion survey” announced by the mayor.

Source: Auditor’s Office illustration based on information from the Mayor’s Office of Social Equity and Innovation.

In February 2019, the office received a proposed scope of services from the National League of Cities and the Government Alliance on Race and Equity to “address the systemic and structural inequities” in the City and County of Denver.” The proposed scope of services included a survey and an assessment of the city’s progress toward equity, training, developing a racial equity action plan, and “strategic assistance.”

In November 2019, the city signed a contract with the National League of Cities to provide those services. While the contract’s scope of services includes an assessment and a survey of city employees to understand their perspectives on racial equity and the challenges to address, the contract does not specifically reference a “citywide scan.” Invoices provided to us recently confirm the city was not charged for services under the contract related to the assessment or the survey.

Among the additional documentation we were provided after we shared the draft report, current leadership of the Mayor’s Office of Social Equity and Innovation gave us emails showing previous leadership began discussing in December 2019 the purpose and methodology for conducting citywide equity scans. Documentation showed office leadership at that time met with representatives from the University of California at Berkeley and the Government Alliance on Race and Equity in January 2020 to discuss the equity scans — including the primary goal of launching a 2020 citywide equity scan, examples, and evaluation practices.

However, current leadership told us plans for an equity scan were canceled due to the pandemic, and the office instead focused on conducting a COVID-19 employee inclusion survey.
Furthermore, the documentation showed that in April 2020, the mayor sent a message to inform all city employees of the COVID-19 employee inclusion survey. Current leadership said previous Social Equity and Innovation leadership, along with the Office of Human Resources, determined that the initial plans for the citywide equity scan were no longer appropriate because a citywide employee engagement survey goes to city employees every two years.

While this additional documentation provides insight into the evolving intent of the citywide scans, these discussions about changing the purpose and method of conducting equity scans happened before June 2020 — when Executive Order 146 took effect. The definition of these citywide equity scans was not clarified to reflect those evolving intentions.

Regardless of the intent of these scans, assessments, or surveys, the executive order should clearly reflect and define those intentions so they can be clearly communicated.

Federal guidance stresses the need for effective documentation to assist management in establishing the “who, what, when, where, and why” of processes and in retaining institutional knowledge.73 As previously mentioned, federal standards also stress the importance of a “tone at the top” and how it is “fundamental” to effective governance.74

Given the office's loss of institutional knowledge as top officials changed in recent years, the differing statements among its staff and former adviser, and the changed intentions of the scans before the executive order took effect, current leadership needs to clarify and define in the executive order what the citywide equity scans are.

Overall, a thoroughly detailed executive order from the Mayor's Office that includes well-defined terms and clearly documented roles and responsibilities for both Social Equity and Innovation and other city agencies would set the “tone at the top” and provide Social Equity and Innovation with the authority it needs to execute its responsibilities — particularly in the budget equity process and in conducting the required equity scans.

In addition, documented policies and procedures and a formal assessment of appropriate staffing levels would also help Social Equity and Innovation ensure it can achieve its mission and goals.


2.1 RECOMMENDATION Review and Revise Executive Order No. 146

As the Mayor's Office of Social Equity and Innovation updates its program design as part of Recommendation 1.1, it should work with the Mayor’s Office to evaluate Executive Order No. 146 and revise it to clarify vague wording and to better reflect Social Equity and Innovation’s existing responsibilities and initiatives. Specifically, the revised executive order should clearly define:

- Social Equity and Innovation’s authority to enforce other city agencies’ compliance with its initiatives.
- The roles and responsibilities of other city agencies in fulfilling the executive order’s requirements.
- Whether equity training offered by Social Equity and Innovation is mandatory for city staff.
- Social Equity and Innovation’s and other city agencies’ roles in the budget equity process.
- What a “citywide equity scan” is intended to be.

Once the executive order is revised, Social Equity and Innovation should ensure it fully complies with all requirements.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 8, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.

2.2 RECOMMENDATION Evaluate the Future of Executive Order No. 146

As the Mayor's Office of Social Equity and Innovation works with the Mayor’s Office to review Executive Order 146 as part of implementing Recommendation 2.1, it should consider whether an executive order is the appropriate method for achieving agencies’ compliance with the city's equity initiatives or whether Social Equity and Innovation and its efforts should be codified by other means, such as in city ordinance. Social Equity and Innovation should document its decision and the decision-making process it used.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 8, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.
2.3 RECOMMENDATION Ensure Agencies Comply with Executive Order No. 146

The Mayor’s Office of Social Equity and Innovation should work with the Mayor’s Office to obtain the support it needs to ensure all agencies under the mayor comply with Executive Order 146. The office should document these discussions and any efforts to gain agencies’ compliance.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 8, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.

2.4 RECOMMENDATION Explore Alternative Training Methods

The Mayor’s Office of Social Equity and Innovation should work with the Office of Human Resources to evaluate other ways to offer training courses on equity and racial and social justice to city employees to maximize Social Equity and Innovation’s mission of achieving transformative change in city government.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – SEPT. 23, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.

2.5 RECOMMENDATION Identify Budget Personnel

The Mayor’s Office of Social Equity and Innovation should work with the Budget and Management Office to develop and document a process to identify city agencies’ staff who are new to the budget equity process and ensure they understand the process and receive the necessary resources and training.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – SEPT. 23, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.
2.6 RECOMMENDATION Document Activities for the Budget Equity Process

As part of documenting roles and responsibilities in policies and procedures as part of Recommendation 1.5, the Mayor’s Office of Social Equity and Innovation should draft policies and procedures that document its roles and responsibilities specifically for the budget equity process. The office should define specific activities such as:

- Training city employees about the process.
- Reviewing and providing feedback on agencies’ budget proposals.
- When Social Equity and Innovation should be involved in the budget equity process.
- How it should work with the Budget and Management Office.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 8, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.

2.7 RECOMMENDATION Evaluate Staffing and Resources for the Budget Equity Process

As the Mayor’s Office of Social Equity and Innovation updates its program design as part of Recommendation 1.1, the office should conduct a formal, documented evaluation of its staffing levels and resources to determine whether they are adequate for office staff to participate in the budget equity process to the extent they desire.

AGENCY RESPONSE: AGREE, IMPLEMENTATION DATE – NOV. 8, 2022
SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.
FINDING 3 AND RECOMMENDATION

The Mayor’s Office of Social Equity and Innovation Does Not Have a Plan to Ensure Clear, Consistent Communication with Other City Agencies

While the Mayor’s Office of Social Equity and Innovation generally communicates well with other city agencies, the office has not formalized its communication practices to ensure clarity and consistency.

Executive Order No. 146 gives Social Equity and Innovation the responsibility to “direct and coordinate city and external stakeholders” by engaging with agency leaders and city employees, among others, to “increase social equity and to minimize institutional, structural, and systemic racism in City government.”

To assess the office's communication efforts, we used our professional judgment to identify seven members of agencies’ equity, diversity, and inclusion teams — which are responsible for advancing equitable and inclusive practices among their agency’s staff. We sent each of the seven team members a survey and received responses from five.

Regarding overall communication:

• Four said Social Equity and Innovation’s communication was “good.”

• One said communication “could be better.” Specifically, they said they had not received any written communication from the office regarding roles and responsibilities. Communication was often verbal, not clear, and not proactive.

The same team member expressed confusion about Social Equity and Innovation’s roles within the executive order, and they wanted the office to collaborate more with agencies’ equity, diversity, and inclusion teams when making decisions.

• One said they wanted to know more about the initiatives other agencies are working on and how the teams can “align activities on a citywide basis.”

Other comments from these team members related to how the office communicated with them about the Race and Social Justice Academy. Two team members said the offerings were provided on “somewhat short notice” — one said they received only a week’s notice — so they had difficulty scheduling the sessions around staff members’ regular duties.

Communication with urgency is “critical to maintain motivation and inspiration to work collectively toward racial equity objectives.”

Communication from the office was also unclear on whether the Race and Social Justice Academy was required or optional, an issue we discussed in Finding 2.

We learned the Mayor’s Office of Social Equity and Innovation has no documented communication plan or policies and procedures for ensuring it consistently communicates information with other city agencies.

The Government Alliance on Race and Equity says communicating with urgency is “critical to maintain motivation and inspiration to work collectively toward racial equity objectives.” Additionally, federal guidance emphasizes that managers should communicate quality information, both internally and externally, through set reporting lines to help an organization achieve its objectives.

Additional federal guidance on program design says organizations should use a communication plan to coordinate messaging both with internal staff and with external stakeholders.

As shown in Figure 5, a communication plan documents key stakeholders, the information to be communicated, who should receive the information, how often it should occur, and how the information will be conveyed.

Effective communication can include:

- Regular notifications about any changes, posted in a central location.
- Established reporting structures within an organization to ensure information flows effectively.

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**FIGURE 5. Key Components of a Communication Plan**

![Diagram of a communication plan](slugs:Equity_CommPlan-v2)

**Source:** Auditor’s Office illustration based on federal guidance.

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• Data dashboards or summary reports to provide status updates, both within an organization and to external stakeholders.

Without a clearly outlined plan for citywide communication with other city agencies, the Mayor’s Office of Social Equity and Innovation cannot ensure all city agencies will receive consistent types and levels of communication to guide the city’s racial and social justice work.

This could impact how effective the Mayor’s Office of Social Equity and Innovation is in increasing social equity and minimizing institutional, structural, and systemic racism across city government, in line with Executive Order 146.79

### 3.1 RECOMMENDATION

**Develop and Document a Communication Plan**

The Mayor’s Office of Social Equity and Innovation should develop and document a communication plan for how it plans to communicate information with other city agencies. The plan should identify all necessary stakeholders and detail when, where, and how the office will communicate:

- Timely notification of upcoming trainings.
- The roles and responsibilities of agencies’ equity, diversity, and inclusion teams, in line with Recommendation 1.5.
- Citywide initiatives, either from Social Equity and Innovation or other city agencies.

The office should share the plan with all necessary stakeholders to ensure communication is clear and consistent.

**AGENCY RESPONSE:** AGREE, IMPLEMENTATION DATE – OCT. 14, 2022

SEE PAGE 44 FOR THE AGENCY’S FULL RESPONSE TO OUR RECOMMENDATIONS.

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AGENCY RESPONSE TO AUDIT RECOMMENDATIONS

The following agency narratives are reprinted verbatim from the agency’s response letter.

As noted in the report, “both its (Mayor’s Office of Social Equity and Innovation) original chief equity officer and the interim replacement left the city between June 2021 and September 2021” (pg. 28, last paragraph). The entrance conference for this audit occurred September 8, 2021. The current chief equity officer began responsibilities in this role October 2021. As noted in the narratives, concerns remain relative to depictions of the original and interim chief equity officers and the work they oversaw. However, in an effort toward good faith, responsiveness, and an overarching goal of serving Denver’s most marginalized communities, the current chief equity officer has agreed to implement all 16 recommendations.

The Mayor’s Office of Social Equity and Innovation and the Auditor’s Office agree that completing the provided recommendations will continue building upon the foundation for effective governance in implementing the city’s equity initiatives. That being said, we must note that context must be added to the posit that “the office lacks these foundations because previous chief equity officers did not prioritize creating them” (page 10, paragraph 3).

The original chief equity officer and interim chief equity officer were charged by the Mayor to respond to the unexpected and immediate need of “Saving the City” during the worldwide COVID-19 pandemic. This was done by embedding equity in the Emergency Operations Center during the COVID-19 pandemic (March 2020 – June 2021) and protests related to the murder of George Floyd (May 2020 – June 2020). Like many local and national leaders who grappled with responding to needs during this difficult time, so too, did the prior leadership grapple with making difficult but necessary decisions. The original chief
equity officer and interim chief equity officer, at the urging of the Mayor and community, focused on supporting policies and practices that saved lives in real-time. They did this by embedding equity perspectives in the responses to multiple emergencies, which had direct and measurable impacts on Denver’s most marginalized racial and ethnic populations.

**RECOMMENDATION 1.1**

**AGENCY RESPONSE:**

AGREE

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:**

NOV. 23, 2022

In response to Recommendation 1.1, the Mayor’s Office of Social Equity and Innovation is prepared to review and update its existing program design and then document all elements of the office.

As noted in the report, “the office’s newest framework, released in January 2022, introduced four entirely new goals that are also inconsistent with the office’s previous ones.” (page 15, paragraph 2). It is important to note that similar to the documents submitted in January 2022, reflecting a customary shift of new leadership’s vision and collaborative input from staff, the documents in response to Recommendation 1.1 will likely differ from the documents submitted on behalf of the previous leadership.

**RECOMMENDATION 1.2**

**AGENCY RESPONSE:**

AGREE

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:**

NOV. 23, 2022

In alignment with Recommendation 1.1 and in response to Recommendation 1.2, the Mayor’s Office of Social Equity and Innovation is prepared to conduct a formal needs assessment of the office and its initiatives to ensure it meets identified needs in the city in consideration of Executive Order 146.

**RECOMMENDATION 1.3**

**AGENCY RESPONSE:**

AGREE

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:**

NOV. 23, 2022

In response to Recommendation 1.3, develop and document a strategic plan that aligns with Executive Order No. 146, to include, but not limited to specific and measurable objectives, key performance metrics, method for analyzing outside factors and stakeholder concerns, and an action plan to address the implementation of strategies.
RECOMMENDATION 1.4
AGENCY RESPONSE: AGREE
AGENCY’S TARGET DATE FOR IMPLEMENTATION: NOV. 8, 2022

In alignment with Recommendation 2.1 and in response to Recommendation 1.4, the Mayor’s Office of Social Equity and Innovation is prepared to ensure its mission, goals, and strategies are consistent across Executive Order No. 146, all strategic planning documents, and all office communications.

As noted in the report, “the office's newest framework, released in January 2022, introduced four entirely new goals that are also inconsistent with the office’s previous ones.” (page 15, paragraph 2). It is important to note that similar to the documents submitted in January 2022, reflecting a customary shift of new leadership’s vision and collaborative input from staff, the documents in response to Recommendation 1.4 will likely differ from the documents submitted on behalf of previous leadership.

RECOMMENDATION 1.5
AGENCY RESPONSE: AGREE
AGENCY’S TARGET DATE FOR IMPLEMENTATION: SEPT. 23, 2022

The Director of Operations and Innovation position was created by the current Chief Equity Officer in November 2021 and the role was filled in late December 2021. Hence, as noted in the audit, the work was incomplete as of January 2022 (pg. 17, paragraph 2).

The Director of Operations and Innovation is responsible for overseeing the documentation of all operations to ensure that consistent, transparent, and efficient workflows are in place, yielding optimal productivity and performance for the Mayor’s Office of Social Equity and Innovation. At the time of the ongoing audit, the Director of Operations and Innovation was in the process of developing and having approved a Policy and Procedure Manual including, but not limited to, the items identified in Recommendation 1.5. The manual is designed to be a living document as various processes, policies, and procedures are being developed with the growth of the office.

In response to Recommendation 1.5, the Mayor’s Office of Social Equity and Innovation is prepared to provide the Policy and Procedure manual by the identified target date with the inclusion of a schedule for periodic reviews and a distribution plan to OSEI staff and citywide EDI teams.

RECOMMENDATION 1.6
AGENCY RESPONSE: AGREE
AGENCY’S TARGET DATE FOR IMPLEMENTATION: SEPT. 23, 2022
SEE PAGE 52 FOR THE AUDITOR’S ADDENDUM.

The audit report indicates, “The current chief equity officer said staff members were given job descriptions before they were hired. However, job descriptions do not detail the specific tasks staff must complete on a day-to-day basis to fulfill their job duties.” (pg. 17, paragraph 6). It is important to note that the guidance by Denver’s Office of Human Resources does not deem this as a customary nor required practice for the City and County of Denver, consequently, there is no standardized organizational
template or document to outline day-to-day tasks and most positions across the City do not include this type of document.

The current Chief Equity Officer restructured the Mayor’s Office of Social Equity and Innovation in December 2021 to reflect new methods of operation with the addition of several new staff, clearly define the scope and responsibilities of staff, and minimize interruptions when staff members leave the organization. In response to Recommendation 1.6, the Mayor’s Office of Social Equity and Innovation is prepared to include a listing of staff roles and responsibilities and documentation to address a succession and contingency plan as a part of the aforementioned Policy and Procedure Manual (Recommendation 1.5) by the identified target date.

**RECOMMENDATION 1.7**

**AGENCY RESPONSE:**
AGREE

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:**
NOV. 23, 2022

In alignment with Recommendation 1.3 and in response to Recommendation 1.7, the Mayor’s Office of Social Equity and Innovation is prepared to ensure metrics are documented, tracked, and align with overall goals, strategies and objectives.

**RECOMMENDATION 1.8**

**AGENCY RESPONSE:**
AGREE

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:**
NOV. 8, 2022

With the assistance of the Mayor’s Office and the Office of Human Resources, at the time of this audit, a process was developed to identify all agency-specific equity personnel.

In response to Recommendation 1.8, the Mayor’s Office of Social Equity and Innovation is prepared to provide additional clarity related to the work of this office and that of agency-specific equity personnel. This will include developing and documenting a process for agencies with their own equity staff members to ensure those individuals receive and communicate information consistent with citywide initiatives and the Mayor’s Office of Social Equity and Innovation. Additionally, clear roles and responsibilities will be documented and communicated to ensure alignment with the Mayor’s Office of Social Equity and Innovation and citywide equity initiatives.

**AGENCY NARRATIVE FOR AUDIT FINDING 2**

Some equity offices that are listed in the report as having equity enforcement authority (page 58, table) are in our national network and describe themselves as weaving Civil Rights Title VI plans into their work as an implementation tool, however, they reiterate that this work is enforced at the federal, rather
than local level. In particular, Portland officials describe their government as a “weak Mayoral system.”

It is important to note that the use of the word “enforcement” in equity offices is particularly complex, as offices like the Mayor’s Office of Social Equity and Innovation tend to focus on systems design and not on individualized equity-based compliance (an issue we assert should be left to Human Resources). The Mayor’s Office of Social Equity and Innovation acknowledges that racism exists at several levels, however, we aim to address work at an institutional and structural level.

**RECOMMENDATION 2.1**

**AGENCY RESPONSE:** AGREE

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:** NOV. 8, 2022

In conjunction with Recommendation 1.1 and in response to Recommendation 2.1, the Mayor’s Office of Social Equity and Innovation is prepared to work with the Mayor’s Office to evaluate and revise the wording of Executive Order No. 146 to better reflect its existing responsibilities and initiatives.

**RECOMMENDATION 2.2**

**AGENCY RESPONSE:** AGREE

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:** NOV. 8, 2022

The original chief equity officer and interim chief equity officer and the Mayor’s Office report working together to consider the appropriateness of codifying the Mayor’s Office of Social Equity and Innovation beyond Executive Order 146. The final decision is outstanding.

In response to Recommendation 2.2, the Mayor’s Office of Social Equity and Innovation is prepared to continue working with the Mayor’s Office to document the decision-making process and the decision.

**RECOMMENDATION 2.3**

**AGENCY RESPONSE:** AGREE

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:** NOV. 8, 2022

In response to Recommendation 2.3, the Mayor’s Office of Social Equity and Innovation is prepared to continue working with the Mayor’s Office to ensure the support needed to comply with Executive Order 146 is firmly established.

It is important to note that at the time of this audit, the following items have been addressed:

*Equity Commitments (page 26):* At the time of this audit, all agency heads under the purview of the Mayor were in the process of reviewing and signing the City’s revised equity commitment. This task was completed by February 2022. The revised commitment aligned with the revised goals distributed in January 2022 and signed commitments.

*Racial Equity Action Plans (pages 26-27):* At the time of this
Audit, all agencies under the purview of the Mayor were in the process of completing their racial equity action plans for final approval. This task was completed by May 2022. While independent agencies were not required to submit Racial Equity Action Plans, leadership and staff from these agencies are always welcome to participate, similar to the open invitation extended to attend the Race and Social Justice Academy.

Trainings (pages 27-28): At the time of this audit, all agency Executive Directors were in the process of reviewing and signing the City’s revised equity commitment. The document includes a commitment to have their respective staff trained through the Race and Social Justice Academy provided by the Mayor’s Office of Social Equity and Innovation by Q1 2023. It is also worth noting that all appointees are scheduled to complete the Race and Social Justice Academy in September 2022.

**RECOMMENDATION 2.4**

**AGENCY RESPONSE:**

**AGREE**

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:**

**SEPT. 23, 2022**

The Director of the Race and Social Justice Trainings and Strategies role was developed December 2020; however, the current Director began serving in this role late January 2022. The former Director was largely tasked with developing the Race and Social Justice Academy and then revamping the entire course from an in-person format that relied on interpersonal engagement to a virtual platform, in response to employees’ new remote work environments.

At the time of this audit, the current Director of Race and Social Justice Trainings and Strategies was in the process of developing an asynchronous version of the Race and Social Justice Academy. This training was completed in April 2022 and is in a beta testing phase with a pending release date. Offering training in an asynchronous format means that employees can access RSJ Academy when and where it is convenient for them via Workday.

In response to Recommendation 2.4, the Mayor’s Office of Social Equity and Innovation is prepared to work with the Office of Human Resources to evaluate other ways to offer training courses on equity and racial and social justice to city employees to maximize the Mayor’s Office of Social Equity and Innovation’s mission of achieving transformative change in city government.

**RECOMMENDATION 2.5**

**AGENCY RESPONSE:**

**AGREE**

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:**

**SEPT. 23, 2022**

Multiple tiers of leadership within each agency receive an invitation from the Budget and Management Office to attend the annual budget presentation meetings. It is worth noting that not all staff or managers are involved in the budget process, however, recipients are encouraged to share the invitations and information with their appropriate staff. The Budget and
Management Office will receive a list of staff from executive directors who require access to the City's budget system. All budget training, including, but not limited to budget equity training, will be provided to identified staff who are identified as staff to be engaged in the budget process.

In conjunction with Recommendations 1.5, 2.4, and 2.6 and in response to Recommendation 2.5, the Mayor’s Office of Social Equity and Innovation is prepared to work with the Budget and Management Office to ensure as a part of the annual budget kickoff invitation, executive leaders are encouraged to review and share the invitation with their appropriate staff to learn the budget process, receive the necessary resources and training, and address any outstanding questions staff may have to facilitate their understanding.

RECOMMENDATION 2.6

As part of the annual budget planning process, the Mayor's Office of Social Equity and Innovation and the Budget Management Office evaluate the upcoming budget process and assess the roles and expectations for the budget equity process. This will continue for the 2024 budget process as well, and OSEI's role in the process will be formally documented in the 2024 Budget Manual.

In conjunction with Recommendation 1.5 and in response to Recommendation 2.6, the Mayor's Office of Social Equity and Innovation is prepared to draft policies and procedures that further document its roles and responsibilities specifically for the budget equity process.

RECOMMENDATION 2.7

In conjunction with Recommendation 1.1 and in response to Recommendation 2.7, the Mayor's Office of Social Equity and Innovation is prepared to conduct a formal, documented evaluation of its staffing levels and resources to determine whether they are adequate for office staff to participate in the ongoing budget equity process.

As part of the annual budget planning process, the Mayor's Office of Social Equity and Innovation and the Budget Management Office will evaluate the upcoming budget process and assess the roles and expectations for the budget equity process. This will continue for the 2024 budget process as well and OSEI's role in the process will be formally documented in the 2024 Budget Manual.
The Mayor’s Office of Social Equity and Innovation and the Auditor’s Office agree a plan to ensure clear and consistent communication with other city agencies will allow for effective communication. The original and interim chief equity officer were responsible for communications. To align with a lean approach to structure, the current chief equity officer has shared a staff member on a part-time basis with the Mayor’s Office Communications team. Subsequently, creating and executing formalized communication plans have been beyond the breadth of work capacity for current staff.

**RECOMMENDATION 3.1**

Agency Response: Agree

Agency’s Target Date for Implementation: Oct. 14, 2022

In conjunction with Recommendations 1.1 and 1.5 and in response to Recommendation 3.1, the Mayor’s Office of Social Equity and Innovation is prepared to evaluate staffing duties related to communications, develop and document a communication plan to communicate information with other city agencies. As part of a formalized communications and distribution plan for internal and external stakeholders to the Mayor’s Office of Social Equity and Innovation, the following items will be further developed and/or created: social media presence and regular updates to executive leaders, city employees, and its external partners.
AUDITOR’S ADDENDUMS

Auditor’s Addendum to Agency Narrative for Finding 1

We acknowledged in Figure 1 on page 5 the involvement of the original chief equity officer and interim chief equity officer with the city’s Emergency Operations Center during the pandemic and the protests against the killing of George Floyd. We again acknowledged the importance of this involvement on pages 19 and 20 of the report.

The Mayor’s Office of Social Equity and Innovation references these critical responsibilities as the reason for it lacking a detailed strategic plan and other foundations for governance. However, as noted on page 20, discussion and planning for the Mayor’s Office of Social Equity and Innovation had been underway nearly three years before a pandemic was declared in March 2020.

Leading practices say the first step in creating a new program is to assess the specific strategic goals and objectives the program could achieve and then to design the program to achieve them. Documenting strategies and activities in a strategic plan would have been best achieved during the three years of discussions before the pandemic and before the mayor signed Executive Order No. 146.

As we said on page 12, original leadership’s responsibility should have included developing and documenting the staffing and resources needed to obtain the results and expected outcomes desired in a logic model — and how it would then monitor and evaluate its success of those efforts. This would have ensured the office’s strategies aligned with its mandated responsibilities in the executive order and that the office’s foundations were effective, documented, and communicated as necessary to current and future office leadership and staff.

Because previous leadership did not prioritize these necessary tasks as the office was being developed before the pandemic and before the signing of the executive order, the Mayor’s Office of Social Equity and Innovation’s responsibilities within the executive order are unclear and lack sufficient authority to effectively accomplish those responsibilities. Nevertheless, with the implementation of the office’s newest framework and goals, released in January 2022, current leadership has the opportunity to implement these audit recommendations for ensuring the office can effectively and successfully achieve the goals outlined in the framework.

Auditor’s Addendum to Agency Response for Recommendation 1.6

As we said on page 17, job descriptions — by design — do not provide detailed day-to-day activities an individual may perform in a particular position, nor do they provide how an individual should perform those tasks.

While the Mayor’s Office of Social Equity and Innovation is correct that the Office of Human Resources does not require agencies to document day-to-day roles and responsibilities of staff, federal guidance — as discussed on page 19 of the report — emphasizes the importance for management to document procedures in formal policies by defining day-to-day activities for implementing those procedures.

Recommendation 1.5 provides the opportunity for the Mayor’s Office of Social Equity and Innovation to document comprehensive policies and procedures, which — when regularly updated and communicated — provide a foundation to help ensure the office retains institutional knowledge.
OBJECTIVE

To determine whether the Mayor’s Office of Social Equity and Innovation effectively designed, implemented, and evaluated its initiatives to achieve its mission, goals, and responsibilities.

SCOPE

We assessed the design and implementation of the Mayor’s Office of Social Equity and Innovation’s equity framework and initiatives related to Executive Order No. 146, guidance from the Government Alliance on Race and Equity, and leading practices for program design and strategic planning. We reviewed documentation related to program design elements, office practices, and internal controls. The time period we looked at was from July 2018 through January 2022.

Scope Limitation

According to generally accepted government auditing standards, auditors should “report significant constraints imposed on the audit approach by information limitations or scope impairments, including denials of, or excessive delays in, access to certain records or individuals.”

Near the end of this audit and before we finalized the draft report, the audit team discovered a $30,000 consulting contract between the city and Desmond Ray LLC — a business owned and operated by the former interim chief equity officer of the Mayor’s Office of Social Equity and Innovation. The former interim chief equity officer attended the audit entrance conference on Sept. 8, 2022, and did not disclose the pending contract.

Despite several attempts by us during the audit to ensure we received all available documentation and information related to our scope, leaders of the Mayor’s Office of Social Equity and Innovation neglected to disclose this contract, which was in effect from Sept. 15, 2021, to Feb. 1, 2022.

This contract was in coordination with the Mayor’s Office of Social Equity and Innovation and overseen by the newest chief equity officer, who assumed their role in October 2021. Its scope included several items related to findings and recommendations in this report. Specifically, the scope included:

- Advising on equity plan strategies, equity indicators, and racial equity toolkits.
- Working with the University of California at Berkeley.
- Working on Executive Order No. 146 and a draft ordinance.

When we asked for documentation in June 2022 showing the contract was fulfilled, the current chief equity officer willingly provided the information. However, because this was not provided to us during the audit, we could not fully audit these documents to determine whether the consulting contract was adequately fulfilled and we also could not assess how this information might impact our findings.

This limitation and officials' lack of disclosure impeded our ability to ensure we fully assessed how the Mayor's Office of Social Equity and Innovation implemented its equity framework and initiatives.

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**METHODOLOGY**

We used several methodologies to gather and analyze information related to the audit objectives. The methodologies included but were not limited to:

- Interviewing staff members from:
  - The Mayor’s Office of Social Equity and Innovation.
  - The Mayor's Office.
  - The City Attorney's Office.
  - The Budget and Management Office.
  - Denver Arts & Venues.
  - Municipal race and social justice programs in:
    - Portland, Oregon.
    - Seattle.
    - Boston.
- Observing the Race and Social Justice Academy training courses.
- Surveying agencies’ equity, diversity, and inclusion team members and budget personnel, as described in Appendix A.
- Reviewing:
  - Executive Order No. 146.
  - Executive Order No. 1.
  - City ordinances.
  - The City and County of Denver’s 2021 and 2022 annual budgets.
  - The Mayor’s Office of Social Equity and Innovation’s strategic frameworks from 2019 through 2021.
  - The Mayor’s Office of Social Equity and Innovation’s budget equity guide.
  - The Denver Department of Public Health and Environment’s “80x50 Climate Action Plan.”
  - The University of California at Berkeley’s “Equity Indicators for the City of Denver” report.
  - The $300,000 Wend II Inc. grant, which paid for two positions in the Mayor’s Office of Social Equity and Innovation.
- The National League of Cities’ 2019 contract with the agency for Human Rights and Community Partnerships to help the city implement the Government Alliance on Race and Equity’s “Racial Equity Toolkit.”
- Government Finance Officers Association guidance on establishing strategic plans.
- The Government Alliance on Race and Equity’s “Racial Equity Toolkit.”
- The Government Alliance on Race and Equity’s “Advancing Racial Equity and Transforming Government” guide.
- The U.S. Department of State’s “Program Design and Performance Management Toolkit.”
- United Way Greater Toronto’s “Program Design & Development Resources.”
- Reviewing and analyzing:
  - Documentation related to the design of the Mayor’s Office of Social Equity and Innovation compared to leading practices.
  - Documentation related to municipal race and social justice programs in:
    - Portland, Oregon.
    - San Francisco.
    - Boston.
    - Austin, Texas.
    - Seattle.
  - Documentation in the city’s system of record, Workday, related to expenses paid for by the Wend II Inc. grant.
  - The Mayor’s Office of Social Equity and Innovation’s race and social justice training dashboard results compared to training data in Workday.
APPENDICES

Appendix A – Selection of Agency Personnel for Surveys

As part of this audit, we surveyed several city agencies’ equity, diversity, and inclusion teams and city budget personnel who participate in the city’s budget equity process to learn about their experiences with the Mayor’s Office of Social Equity and Innovation.

AGENCIES’ EQUITY, DIVERSITY, AND INCLUSION TEAMS – We surveyed seven equity, diversity, and inclusion team members from six city agencies to learn about their interactions with the Mayor’s Office of Social Equity and Innovation.

Because not all agencies have active equity, diversity, and inclusion teams, we chose four agencies that Social Equity and Innovation staff highlighted as being both cooperative and uncooperative. We then chose three other agencies to include independent agencies that voluntarily completed equity action plans. Of the seven surveys we sent, we received five responses.

Our questions asked the team members to assess:
- Communication and support from the Mayor’s Office of Social Equity and Innovation to meet their agency’s equity goals.
- Examples of communication received from the office related to equity, diversity, and inclusion team duties — including communication related to equity action plans, training, equity goals, and roles and responsibilities.
- Whether their agency received adequate notice of the Race and Social Justice Academy so agency personnel could sign up.
- The level of involvement their agency’s leadership has with their equity, diversity, and inclusion team.

AGENCY BUDGET PERSONNEL – We surveyed eight agencies’ budget personnel to learn about their experiences with the city’s budget equity process.

Because we were provided with two contacts from one of those agencies, we sent nine surveys. We chose five agencies that both the Mayor’s Office of Social Equity and Innovation and the Budget and Management Office highlighted. We also used our professional judgment to choose three other agencies to include independent agencies. Of the nine surveys sent, we received five responses.

Our questions asked the budget staff to assess:
- Guidance from both the Mayor’s Office of Social Equity and Innovation and the Budget and Management Office.
- The level of collaboration with the Mayor’s Office of Social Equity and Innovation during the budget equity process.
- How helpful the training and resources from the Mayor’s Office of Social Equity and Innovation were, related to the budget equity process.
- Challenges they faced when working to incorporate equity into their agency’s budget.
- Suggestions to improve the city’s budget equity process.
Appendix B – Comparison of Selected Other Cities’ Equity Office

As part of assessing the efforts of the Denver Mayor’s Office of Social Equity and Innovation to implement the city’s equity initiatives, we compared aspects of Denver’s program — such as its method of codification, enforcement authority, recourse for noncompliance, and training mandates — with five other U.S. cities that have equity offices. We did not evaluate the effectiveness of these cities’ policies and procedures.

The other U.S. cities we either spoke with and/or reviewed available documentation from were:

- Seattle.
- Portland, Oregon.
- Austin, Texas.
- San Francisco.
- Boston.

We chose these cities based on similarities to Denver such as population, demographics, and membership in the Government Alliance on Race and Equity and whether their equity offices were formalized by executive order or codified in city ordinance.

While we interviewed staff from Seattle; Portland, Oregon; and Boston, we did not speak directly with staff from Austin or San Francisco. Instead, we obtained documents from San Francisco and we reviewed information for Austin that was available online.

Table 1 on the next page summarizes the information of these five cities compared to Denver.
TABLE 1. Comparison of the Denver Mayor’s Office of Social Equity and Innovation with Selected Other U.S. Cities’ Equity Offices

<table>
<thead>
<tr>
<th></th>
<th>Seattle</th>
<th>Portland, Oregon</th>
<th>Boston</th>
<th>Austin, Texas</th>
<th>San Francisco</th>
<th>Denver</th>
</tr>
</thead>
<tbody>
<tr>
<td>How long the city has had an equity office</td>
<td>18 years</td>
<td>10 years</td>
<td>6 years</td>
<td>5 years</td>
<td>2 years, 5 months</td>
<td>2 years, 3 months</td>
</tr>
<tr>
<td>Where the equity office gets its authority</td>
<td>Executive order, but considering an ordinance</td>
<td>Ordinance</td>
<td>Executive order</td>
<td>Ordinance</td>
<td>Ordinance</td>
<td>Executive order</td>
</tr>
<tr>
<td>Whether the equity office has enforcement authority to obtain other city agencies’ compliance with equity initiatives</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>Unknown</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Types of recourse the equity office has when other city agencies do not comply with equity initiatives</td>
<td>None</td>
<td>Equity considerations are required by job descriptions and employee performance measures.</td>
<td>The mayor declared racism a public health crisis, so agency budgets can be impacted when they do not comply.</td>
<td>Unknown</td>
<td>None</td>
<td></td>
</tr>
<tr>
<td>Whether the city requires equity training</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Unknown</td>
<td>Unknown</td>
<td>No</td>
</tr>
</tbody>
</table>

**Note:** Because we only reviewed documentation from San Francisco and Austin, Texas, we were unable to get answers to some questions, which we noted as “unknown.”

**Source:** Auditor’s Office research and interviews, as of December 2021.
Office of the Auditor

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

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