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Cover photo by Denver Auditor's Office staff.
AUDITOR'S LETTER

June 22, 2023

We audited police operations and staffing by the Denver Police Department to evaluate the effectiveness of the department’s recruitment and retention practices and to assess its use of data to ensure effective operations. I now present the results of this audit.

We found the department lacks comprehensive, documented guidance to ensure effective operations — including strategies to understand and address low retention, improve recruitment, and ensure citywide community policing efforts that can rebuild trust and relationships with residents and community members. We also found the department should improve access to in-house physical therapy and mental health services, and it lacks documented processes to monitor officers’ time worked.

By implementing recommendations for stronger strategic guidance, staffing analyses, processes to monitor and address low retention, more accessible wellness programs, and policies for monitoring officers’ time worked, the police department will be better able to ensure it has the staff needed to adequately perform necessary services for the communities it serves.

We are pleased the Denver Police Department agreed to implement all 16 of our recommendations. However, aspects of the department’s responses merit further clarification based on our audit findings. See the Auditor’s Addendums on pages 65-68.

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 appreciate the leaders and team members in the Denver Police Department who shared their time and knowledge with us during the audit. Please contact me at 720-913-5000 with any questions.

Denver Auditor’s Office

Timothy M. O’Brien, CPA
Auditor
Police Operations and Staffing
JUNE 2023

Objective
To evaluate the effectiveness of the Denver Police Department’s recruitment and retention practices and determine whether it adequately uses data to assess its resources and ensure effective operations.

Background
The Denver Police Department and its more than 1,400 uniformed officers strive to keep the public safe through crime prevention and crime reduction strategies.

Law enforcement agencies nationwide are struggling to hire and retain officers. This is in part because of greater scrutiny of law enforcement — and negative perceptions by the public — following events like the murder of George Floyd by Minneapolis police in 2020.

Understaffing puts a strain on police agencies, reducing officers’ availability to respond to 911 calls and impairing their wellbeing. It also limits the time officers can spend in the community rebuilding trust and relationships with the people they serve.

The Denver Police Department lacks comprehensive, strategic policies and documented guidance to ensure effective operations

The department does not have:

- A formal strategic plan for how it plans to accomplish long-term goals.
- A community policing plan to guide citywide strategies for interacting with the public and building relationships with Denver’s residents.
- A recruiting program and performance management plan that would provide structure and insight into long-term recruiting initiatives.
- An up-to-date staffing model based on officers’ current workloads.

The Denver Police Department does not have effective strategies to understand and address low retention

While many issues contribute to staff turnover in police agencies, the department lacks adequate strategies to address aspects of low retention that are within its control — such as a lack of diversity among officers, increased stress from staffing shortages, and low morale.

The Denver Police Department should improve officers’ access to in-house physical therapy and mental health services

The department should expand its physical therapy services, and it would benefit from having on-site mental health services. Officials should also do more to promote the wellness programs available to officers.

The Denver Police Department has inconsistent processes to monitor officers’ time worked

The department inconsistently applies time codes when reviewing whether officers work more than 64 hours a week.

WHY THIS MATTERS
Without overall strategic guidance and better recruitment and retention efforts, the Denver Police Department will remain understaffed — which could put officers’ safety, health, and wellness at risk as well as risk community members’ safety.

Additionally, without a comprehensive strategy for community policing, the department’s efforts will remain siloed across the city and Denver police officers will have a harder time healing their relationships with the people they serve.
FINDING 1 AND RECOMMENDATIONS

The Denver Police Department lacks comprehensive, strategic policies and documented guidance to ensure effective operations

The Denver Police Department’s current strategic guidance is missing critical details

Denver’s community policing efforts are not guided by a comprehensive strategy

The recruiting unit lacks a comprehensive program to maximize recruitment efforts

The police department’s staffing model is outdated

FINDING 2 AND RECOMMENDATIONS

The Denver Police Department does not have effective strategies to understand and address low retention

The police department struggles with low retention and low morale

The police department does not effectively collect information to determine reasons for increased turnover

The police department lacks specific goals to ensure the diversity of its officers reflects Denver

FINDING 3 AND RECOMMENDATIONS

The Denver Police Department should improve officers’ access to in-house physical therapy and mental health services

FINDING 4 AND RECOMMENDATION

The Denver Police Department has inconsistent processes to monitor officers’ time worked
<table>
<thead>
<tr>
<th>APPENDICES</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Appendix A – Trends in Denver’s reported crime: 2017-2022</td>
<td>72</td>
</tr>
<tr>
<td>Appendix B – Analyzing police officers' time worked</td>
<td>74</td>
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<tr>
<td>Appendix C – Surveying uniformed officers</td>
<td>75</td>
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BACKGROUND

Law enforcement agencies throughout the nation are having difficulty recruiting and retaining qualified job candidates due to internal and outside factors. Police departments have never before faced the challenges in staffing they have in recent years.

Staffing levels in the Denver Police Department reflect this national trend where, in recent years, the department cannot maintain a large enough staff to adequately perform necessary services, like promptly responding to 911 calls or proactively building relationships in the community. As we discuss in Appendix A, the rate of reported crime per Denver police officer has grown about 31% since 2020.

CRIME TRENDS AND POLICE STAFFING

Our analysis in Appendix A compares trends in reports of violent and nonviolent crime since 2017 to the Denver Police Department’s staffing levels to show crime rates per officer.

For 2022, the Denver Police Department was budgeted to have 1,464 uniformed officer positions, which is its “authorized strength.” As of March 2022, it had only 1,364 active officers — 100 officers, or 7%, short of its approved budget.

Department leaders said Denver police historically lose between 70 to 80 officers a year. But in 2021, the department lost twice the typical amount: 145 officers that year alone, including 65 through retirement. Officers cite varying reasons for voluntarily leaving the department. Retirement is a major cause the department is facing and will continue to face for some years.

The police department’s Deferred Retirement Option Program allows officers and staff who are eligible for retirement to voluntarily stay employed for five more years. During this time, these individuals continue to receive their salary and benefits while having their monthly retirement

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funneled into another account that they receive later. The department benefits by holding on to senior staff for a few years more, which helps retain institutional knowledge.

Of the 65 officers who retired in 2021, 44 — or 68% — took advantage of the deferred retirement program. Last year, 57 officers retired, of which 46 — or 81% — retired through the program.

As of January 2023, 147 officers had signed up for deferred retirement in the coming years. As shown in Table 1, this puts them on track to officially retire between 2023 and 2027.

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**TABLE 1. Number of Denver police officers expected to retire through the Deferred Retirement Option Program, 2023-2027**

Not all retiring officers take advantage of the deferred retirement program. These numbers represent the minimum expected to retire each year, based on officers who have opted for deferred retirement.

<table>
<thead>
<tr>
<th>Retirement year</th>
<th>Total number of officers projected to leave through deferred retirement</th>
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<tbody>
<tr>
<td>2023</td>
<td>10</td>
</tr>
<tr>
<td>2024</td>
<td>7</td>
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<tr>
<td>2025</td>
<td>25</td>
</tr>
<tr>
<td>2026</td>
<td>68</td>
</tr>
<tr>
<td>2027</td>
<td>37</td>
</tr>
</tbody>
</table>

*Source: Information provided by the Denver Police Department.*

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**RECRUITMENT** – The success of a police department’s recruitment process impacts all aspects of its operations.5

The four members of the Denver Police Department’s recruiting unit are responsible for creating and implementing strategies to help attract a qualified and diverse pool of applicants for officer positions. The recruiting unit attends career fairs and community events, holds presentations, promotes job openings on social media, and uses other outreach activities to attract new recruits.

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As shown in Figure 1, the hiring process for a new police officer can take a year, between the six-month application process and the six-month academy.

**FIGURE 1. The Denver Police Department’s application process for new officers**

1. The Denver Police Department’s recruiting unit works to get interested individuals to apply to become a police officer.
2. An interested individual fills out an application online.
3. The applicant then enters the application process... 
   ... overseen by the Civil Service Commission.
4. If successful with all portions of the application process, the applicant enters the police academy, overseen by the Denver Police Department.
5. Upon graduation from the academy, the individual becomes a sworn police officer.

**Source:** Created by Denver Auditor’s Office staff using information from the Denver Police Department.

Once a recruit applies, they enter the Civil Service Commission’s six-month process — which includes written, physical, and video tests; a background investigation and interview; a lie-detector test; a drug screening; and a psychological exam.

The Civil Service Commission is an independent agency responsible for administering the testing process for entry-level positions as well as promotions within both the police and fire departments. It also oversees policy administration and hears disciplinary appeals of classified staff.

The commission exclusively controls the application process and the decision to hire. Once the commission decides to hire a candidate, the recruit attends the police academy. An academy class — overseen by the police department — typically lasts another six months. If recruits graduate from the academy, they become sworn officers.

The Denver Police Department experiences regular turnover. Therefore, the department must continuously recruit new officers to apply for jobs as officers leave the department each year. Aside from retirement, officers provide a range of reasons for leaving the Denver Police Department — or sometimes policing altogether.

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7 City and County of Denver, “Mayor’s Proposed 2023 Budget.”
Community policing

The Denver Police Department strives to keep the public safe through crime prevention and crime reduction strategies.\(^8\)

One of those priorities — as outlined in the city's 2023 budget — is “community policing” at both the district level and across the city.\(^9\) This involves police officers spending a portion of their work time proactively addressing public safety by spending dedicated time in Denver’s neighborhoods as a means to build more positive relationships with community members.

The police department's strategies for community policing specifically focus on:

- Using “precision policing strategies to systematically and proactively address social harms in the community.”
- Emphasizing “one-on-one interactions between police officers and community members, specifically young people.”
- Meeting a department goal for officers to spend 35% of their workday on community policing efforts, so as to allow officers appropriate time between crime prevention and proactive activities.\(^10\)

**DISTRICT-LEVEL EFFORTS** – Within each of Denver’s six patrol districts, the Denver Police Department has a designated community resource officer who focuses on creating relationships with residents and community members. Community resource officers inform residents of neighborhood-specific activities sponsored by the police department.

The Denver Police Department also conducts neighborhood-specific community outreach efforts to help reduce crime by addressing root causes.

**CITYWIDE EFFORTS** – The police department’s community relations unit, composed of three individuals, works directly with district command staff, community resource officers, and the Denver business community to build relationships. The community relations unit’s goal is to encourage positive interactions between officers and community members. The unit also develops and oversees community events including the “School Supply Caravan,” “We Don’t Waste,” and “Rolling in the Holidays.”

Organization, mission, and funding

Denver’s Department of Public Safety oversees the police department as well as the Denver Fire Department, Denver 911, the Denver Sheriff Department, community corrections, public safety youth programs, and the Gang Reduction Initiative of Denver.

The Denver Police Department is led by the chief of police. The department specifically consists of three primary divisions:

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\(^8\) City and County of Denver, “Mayor’s Proposed 2023 Budget,” 630.

\(^9\) City and County of Denver, “Mayor’s Proposed 2023 Budget.”

\(^10\) City and County of Denver, “Mayor’s Proposed 2023 Budget.”
• **ADMINISTRATION** – which oversees training and officer development, financial services, administrative management, diversity and equity, public affairs, airport security, and internal affairs.

• **INVESTIGATIONS** – which oversees major crimes, special operations, strategic investigations, the collection and analysis of forensic evidence, and crisis services.

• **PATROL** – which oversees the city’s six patrol districts.\(^{11}\)

As shown in Figure 2, the department uses its six districts to deploy police officers throughout Denver based on various factors, including trends in reported crime. The department also uses a heat map of hourly 911 calls to determine district needs and scheduling.

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**FIGURE 2. Denver Police Department districts**

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\(^{11}\) City and County of Denver, "Mayor’s Proposed 2023 Budget."
The police department’s overall mission is “preventing crime and increasing public trust while honoring the responsibilities granted to us by those we serve.”

To help the department work toward achieving its mission, officials developed a one-page strategic framework for 2022 through 2024. It consists of five focus areas:

- **PREVENTING CRIME AND TREATING PEOPLE WITH RESPECT** – including innovative crime prevention and customer service.
- **REDUCING SOCIAL HARMs** – prioritizing mental health and reducing substance abuse and “fear of crime.”
- **PRECISION POLICING** – including identifying neighborhood-specific issues, “focused enforcement efforts,” and domestic violence prevention.
- **INNOVATIVE TRAINING** – including education for a “21st century police organization,” community-informed innovations in training, and supporting lifelong learning.
- **TAKING CARE OF THE PEOPLE WHO TAKE CARE OF THE PEOPLE** – including wellness programs, improving work-life balance, and supporting officers who return to work after an injury.

In 2022, the department had a budget of about $246 million. To address ongoing staffing issues, the 2022 city budget included funding for 144 recruits — a substantial increase from previous years. By comparison, the department budgeted for only 50 recruits in 2020 and 105 in 2021. An additional 40 recruits were not part of the 2022 budget but were added and paid for through savings that accumulated from vacant positions.

In addition to taxpayer funding through the annual city budget, the department takes advantage of grants offered by the state and federal governments and nonprofit organizations. For example, in 2022, the department applied for state grant funding intended to provide local police agencies with resources to improve community safety. If awarded, the funding from this grant will help recruitment, retention, and community crime prevention efforts.

**POLICE RESPONSE ALTERNATIVES** – Police officers’ duties have grown as officers respond to all calls for service concerning public safety beyond calls related to crime. Certain calls, however — like those related to individuals experiencing mental health distress — do not always warrant a law enforcement response. Because of that, in recent years, law

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enforcement agencies have begun using alternative response programs that do not involve police.

Denver’s Support Team Assisted Response Program is an example. Trained mental health professionals respond to calls for service involving individuals experiencing distress related to mental health, poverty, homelessness, and substance abuse. Denver Police officials said this program has helped the department by addressing some lower-risk calls — freeing up officers to spend more time responding to crime-related 911 calls and focusing on their other duties.

Police officers’ health and wellness

The Denver Police Department’s operations manual says officers can work up to 64 hours per week and no more than 16 hours in a 24-hour period.\textsuperscript{14} Exceptions are allowed with the police chief’s approval.

Working hours include both on- and off-duty secondary employment hours, which include any officer work that happens outside assigned duties and mandatory hours.\textsuperscript{15} Shifts related to an officer’s appearance in court and assignments requiring unplanned overtime hours do not count against the limits for time worked.

Many police departments — including Denver — restrict the number of hours officers can be on duty. Working increasing amounts of overtime can lead to excess fatigue and potentially adverse effects on community-police relations.\textsuperscript{16}

Officers face many potential risks to their physical and mental health in the line of duty. To support officers, the Denver Police Department — in collaboration with the Department of Public Safety as a whole — offers various wellness programs officers can take advantage of.

The police department’s wellness programs include:

- **THE PEER SUPPORT UNIT** — Overseen by an in-house psychologist, the unit provides confidential support, emergency intervention, and assessment and it oversees the department’s wellness efforts.

- **THE RESILIENCY PROGRAM** — Led by a program coordinator, the program is dedicated to the mental and physical resiliency of department personnel. It refers employees to services, coordinates with peer support and mental health services, and monitors officers’ recovery when they participate in the program.


\textsuperscript{15} Denver Police Department, “Operations Manual.”

• **THE CHAPLAINS UNIT** – Made up of volunteer clergy, the unit provides spiritual and emotional resources to officers and their family members and helps in the overall community policing effort.

• **THE REINTEGRATION PROGRAM** – This program helps officers return to their street duties after being involved in a critical incident, such as a shooting. It offers training on arrest-control techniques, driving courses, virtual simulations, and classes on stress management.

• **A WELLNESS REWARDS PROGRAM** – Officers can benefit from time-off incentives when they engage in healthy behaviors and activities that improve their wellbeing.

• **A CITYWIDE EMPLOYEE ASSISTANCE PROGRAM** – This confidential program offers counseling opportunities for wellness, relationships, finances, and legal concerns at no charge to officers and staff.

• **A PHYSICAL THERAPY PROGRAM** – Shared between the police and sheriff departments, it includes three in-house physical therapists who work with officers who have been hurt, while either on duty or off duty.
FINDING 1 AND RECOMMENDATIONS

The Denver Police Department lacks comprehensive, strategic policies and documented guidance to ensure effective operations

While the police department has taken steps to develop strategic documents, significant gaps remained as of January 2023. Specifically, we found the Denver Police Department lacks:

• A detailed and comprehensive strategic plan for how it plans to accomplish long-term goals.

• A detailed and comprehensive community policing plan, which would describe and guide the department’s strategies for interacting with residents and community members in Denver’s neighborhoods.

• A detailed and comprehensive recruiting program and performance management plan, which would provide structure and insight to guide the department’s long-term recruiting initiatives.

• An up-to-date staffing model based on officers’ current workloads, which would help leaders accurately predict and plan for long-term staffing needs.

If the police department does not develop a comprehensive strategic plan that aligns with leading practices, it will not be equipped to track its progress toward long-term goals and it will not be able to efficiently provide important services to the city.

The Denver Police Department’s current strategic guidance is missing critical details

As of January 2023, the Denver Police Department did not have a detailed and comprehensive strategic plan. Without one, the department cannot effectively predict future needs, determine its progress toward defined long-term goals, or ensure it provides meaningful and efficient police services to the community.17

Federal guidance says a strategic plan should detail an organization’s “mission, long-term goals, strategies planned, and the approaches it will use to monitor its progress” when addressing specific “problems, needs, challenges, and opportunities related to its mission.”18 Additionally, strategic planning helps organizations:

• Assess and respond to the current environment.

• Guide staffing and budget planning decisions.


• Increase overall operational effectiveness.

By comparison, the strategic framework the Denver Police Department currently has does not provide any clear connections between the department’s mission, goals, and objectives. Although it is labeled as a “plan,” it lacks crucial information on how the department will measure its success and progress toward established goals. Developing a truly comprehensive strategic plan would empower the department to influence “the future rather than simply ... adapting to it.”

Police department officials said the department previously had a detailed 30-page strategic plan, but they found staff did not read it. To address that, officials created a simpler, one-page document to communicate their goals for 2022 through 2024.

However, by distilling its expectations into a one-page framework, the Denver Police Department lost critical components of a strategic plan. Specifically, the department’s guidance does not explain:

• How leaders or staff plan to measure progress toward goals and objectives.
• What activities the department has launched to accomplish its stated goals.
• How the department plans to reassess its strategic plan and adjust objectives as needed.

Other information missing from the document — such as details about the department’s mission statement, goals, and specific objectives — are otherwise found in the department’s operations manual or online. Leading practices recommend that these exist in one comprehensive document.

Formal strategic planning requires an organization’s leaders to develop a plan after carefully considering numerous factors, constantly communicating with stakeholders, and establishing specific, measurable goals. Best practices say these activities must occur in a specific, consecutive order.

We found the Denver Police Department has completed some, but not all, of the steps needed to create an effective strategic plan.

As shown in Figure 3 on the next page, the Government Finance Officers Association outlines nine essential steps to guide the planning process. These steps are crucial for organizations to adequately strategize on how they will “fulfill their missions, meet their mandates, and satisfy their constituents.”

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20 Government Finance Officers Association.
21 Government Finance Officers Association.
22 Government Finance Officers Association.
FIGURE 3. The Denver Police Department’s progress toward developing a strategic plan

To be completed

- Reassess the strategic plan.
- Implement the plan and monitor progress.
- Incorporate performance measures.
- Develop measurable objectives.
- Create an action plan.
- Develop strategies to achieve broad goals.
- Agree on a small number of broad goals.
- Assess environmental factors and identify critical issues.
- Initiate the strategic planning process and prepare a mission statement.

Source: Auditor’s Office analysis using guidance from the Government Finance Officers Association.

By following each of these steps — in their intended order — the Denver Police Department could add missing components to its current framework and develop a complete and cohesive strategic plan.

STEP 1: INITIATE THE STRATEGIC PLANNING PROCESS AND PREPARE A MISSION STATEMENT – For a strategic plan to succeed, it is “essential” that the strategic planning process begin with the organization’s chief executive and include relevant stakeholders. For the Denver Police Department, that means strategic planning should be initiated, completed, and fully supported by the Chief of Police’s Office.23

Once the process begins, staff should develop a mission statement: a “broad but clear statement of purpose for the entire organization.” A mission statement clearly defines what an organization should and should not do and it informs the organization’s goals and objectives.24

The police department has a mission statement: “Preventing crime and increasing public trust while honoring the responsibilities granted to us by those we serve, with continued focus on partnerships, learning, and innovation.”25 However, this is available online — not in the one-page strategic guidance. Leading practices say a mission statement should be included in a comprehensive strategic plan to help ensure the plan is an all-inclusive management tool.

Best practices outline nine essential steps for strategic planning that should be completed in a specific, consecutive order.

23 Government Finance Officers Association.
24 Government Finance Officers Association.
STEP 2: ASSESS ENVIRONMENTAL FACTORS AND IDENTIFY CRITICAL ISSUES –
After developing the mission statement, staff should assess both internal and outside factors — such as economic factors, demographic trends, or changes in technology. Leading practices say one way to conduct this analysis is by analyzing strengths, weaknesses, opportunities, and threats.26

Staff in the Denver Police Department said the department conducted this kind of analysis at the former police chief’s request several years ago. While the analysis is acknowledged in the one-page strategic framework, leading practices say it should be updated with the department’s mission statement in mind and included in a comprehensive strategic plan.

Using their conclusions from the analysis, department leaders should work to identify the most critical issues facing the department. These identified issues should also take into consideration the “concerns, needs, and priorities” of relevant stakeholders, such as the public and police officers and staff.27

Department officials provided no documentation indicating they had identified such critical issues.

STEP 3: AGREE ON A SMALL NUMBER OF BROAD GOALS – Police officials should then establish a small number of general goals to address the identified critical issues facing the department. Leading practices recommend ranking goals based on their priority to appropriately distribute resources.28

The Denver Police Department’s general goals from its one-page strategic framework are:

- Reducing social harms.
- Precision policing.
- Innovative training.
- Taking care of the people who take care of the people.

Leading practices say organizations should:

- Incorporate their defined goals into a comprehensive plan.
- Reevaluate the goals to determine whether they align with the critical issues identified in Step 2.
- Rank the goals based on priority.

Although the department has general goals in its framework, these were not ranked based on priority and they lacked documentation on how closely they aligned with any identified critical issues.


27 Government Finance Officers Association.

28 Government Finance Officers Association.
STEP 4: DEVELOP STRATEGIES TO ACHIEVE BROAD GOALS – After agreeing on the goals and their level of importance, officials should then develop strategies to achieve those goals. Strategies should be specific and focus on areas the department can impact or influence.29

For example, the Denver Police Department could develop strategies to improve police operations during a global pandemic, but it cannot create strategies that would prevent a pandemic.

Officials should also discuss proposed strategies with relevant stakeholders who may be involved or impacted.30

As of January 2023, the Denver Police Department had no documentation that explained how staff planned to accomplish the department’s stated goals for 2022 through 2024.

STEP 5: CREATE AN ACTION PLAN – An action plan describes how an organization plans to implement its strategies. Typically, action plans include information on what activities and services will be performed as well as information on estimated costs, the people responsible for implementing the strategies, and general time frames for when the organization plans to reach its goals.31

The Denver Police Department provided no evidence of an action plan, as of January 2023.

STEP 6: DEVELOP MEASURABLE OBJECTIVES – Once the action plan exists, leading practices say officials should develop specific, measurable objectives to guide department activities during a set time frame.32 For example, an objective might include developing an employee exit survey to determine why a police officer left the department.

The Denver Police Department provided no evidence that officials had developed specific and measurable objectives to accomplish the department’s goals for 2022 through 2024.

STEP 7: INCORPORATE PERFORMANCE MEASURES – After detailing the goals, the action plan, and the objectives, leading practices say organizations should create performance measures. Performance measures provide information on how well specific activities are accomplishing the organization’s goals.33

The Denver Police Department provided no evidence that officials had developed performance measures to track progress toward accomplishing the department’s goals.

29 Government Finance Officers Association.
30 Government Finance Officers Association.
31 Government Finance Officers Association.
32 Government Finance Officers Association.
33 Government Finance Officers Association.
STEP 8: IMPLEMENT THE PLAN AND MONITOR PROGRESS – With all prior steps completed, officials can approve the strategic plan and then work to implement it. Leading practices say that means using the strategic plan to inform other areas, such as the operating budget or staffing efforts. Crucially, leadership should tell staff about the plan to enable them to perform key roles toward achieving the organization’s objectives.34

Using the defined performance measures, leadership should also systematically monitor progress at regular intervals.35

STEP 9: REASSESS THE STRATEGIC PLAN – Lastly, leading practices recommend organizations frequently evaluate their performance measures to determine progress toward achieving the defined goals. At least every one to three years, Denver Police officials should review outside factors that impact the department, such as changes in law. They should repeat the more comprehensive strategic planning process every five to 10 years.36

In general, federal leading practices stress the importance of strategic planning as a powerful “predictor of organizational effectiveness” and a positive impact on “organizational performance.”37

Developing and committing to a comprehensive strategic plan that aligns with leading practices would enable the Denver Police Department to more consistently move toward accomplishing defined goals. Additionally, formal strategic planning would encourage police officials to better consider future environmental factors that may impact the department’s ability to provide effective services — such as local or national factors that might affect the city.38

Without a complete strategic plan, the department cannot effectively carry out its responsibilities or determine whether initiatives and programs are successfully achieving department goals, such as increasing officer retention.

36 Government Finance Officers Association.
1.1 RECOMMENDATION

Prepare, implement, and communicate a comprehensive strategic plan

The Denver Police Department should review and update its one-page strategic framework to align with leading practices for creating a complete and documented strategic plan. This process should follow and document each step of strategic planning, in consecutive order, as discussed in the finding. Once completed, department leadership should communicate the new plan to relevant program leaders to ensure staff understand the department’s goals, planned strategies, and expectations for accomplishing them.

AGENCY RESPONSE – AGREE, IMPLEMENTATION DATE – JULY 1, 2023
SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.

Denver’s community policing efforts are not guided by a comprehensive strategy

Locally and nationwide, several events — including the murder of George Floyd by Minneapolis police in 2020 and the subsequent police response to racial justice protests — have put a strain on relationships between communities and law enforcement. Although the protests and other incidents involving police officers’ excessive use of force have inspired communities across the United States to reexamine policing, police-community relations remain strained — and Denver is no exception.

The concept of “community policing” promotes targeted strategies — through partnerships and various problem-solving — to proactively build trust in a community and address public safety issues like neighborhood crime. Since the 1960s, community policing has sought to foster a close relationship between police officers and the communities they serve. A 2022 study of policing best practices says successful community-oriented policing occurs when law enforcement officers view their role “through the lens of being part of a community collaboration for public safety.”

Community policing is a documented priority for the Denver Police Department. But we found department officials are not effectively implementing this mission. Specifically, the department has:

• NO COMMUNITY POLICING PLAN – The Denver Police Department does not have a comprehensive strategy to support its community policing efforts. Neither the community relations unit specifically nor the department overall has a documented plan describing:

• The department’s vision and goals for community policing.
• The roles and responsibilities for officers and staff.
• Key activities and milestones.
• Defined measures of success.

**NO FORMAL WAY TO MEASURE IMPACT** – The department’s community relations unit documents how many people attend community policing-related events. But the police department has no other processes — such as surveying attendees of these events — to measure the impact of community policing efforts or to understand what the department could be doing better. The community relations unit mainly relies on community resource officers to provide feedback. Meanwhile, the department also has not conducted a citywide survey to solicit feedback from residents and community members. As of January 2023, officials were beginning to research ways residents and community members might provide feedback about their interactions with officers.

**SILOED PRACTICES FOR COMMUNITY POLICING** – Each of the department’s six patrol districts has its own approach to community policing based on each district’s perceived needs. District commanders address community-level concerns and identify what community engagement should look like within their own districts — mostly in isolation.

For example, any community-related concerns, like increases in crime, that community resource officers hear about are not shared directly with the community relations unit. Rather, those concerns are addressed by district commanders — meaning the department’s dedicated community relations unit has limited control and oversight of the community policing efforts a specific district might undertake.

Denver Police Department officials told us focusing on only one method for community policing would be difficult given the uniqueness of each neighborhood in the city. They also see community policing as an overarching vision and said they feel community policing cannot be formalized in a plan that is measurable.

However, federal guidance for local law enforcement stresses the importance of police departments creating a comprehensive plan for community policing. Comprehensive plans are necessary to implement an agency’s mission.⁴²

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As shown in Figure 4, federal best practices outline three components of effective community policing — problem solving, community partnerships, and organizational transformation.43

- **PROBLEM SOLVING** – Law enforcement agencies should first determine how often and in what area most service calls occur so they can distribute resources appropriately. Usually, agencies use the “Scanning, Analysis, Response, and Assessment” model for problem-solving, which plays a large role in officers working together with communities.44 The model’s four steps include:
  - Scanning the community for problems.
  - Analyzing those problems in depth.
  - Responding using innovative approaches that go “beyond traditional law enforcement responses.”
  - Assessing the effectiveness of the approach.45

- **COMMUNITY PARTNERSHIPS** – Positive partnerships between police and community members enable officers to find and manage issues that

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**FIGURE 4. Components of effective community policing**

Source: Designed by Auditor’s Office staff using information from the U.S. Department of Justice’s Office of Community Oriented Policing Services.
To improve trust and public perception, policing best practices recommend agencies practice transparency and provide space for the community to feel heard and be treated fairly.

threaten public safety while also helping connect people to services they need.

Strong partnerships between police officers and the communities they serve help improve trust and public perception by reinforcing the idea that officers are working in the community’s best interest. To strengthen public perception, policing best practices recommend agencies practice transparency and provide a space for the community to feel heard and be treated fairly.46

• ORGANIZATIONAL TRANSFORMATION – Leading practices also say agencies should have an organizational structure that helps support departmentwide community policing. Having buy-in across the department and promoting community policing as a priority are necessary.47

If an agency does not fully support and embrace community policing, its officers will have more difficulty dedicating the time and resources necessary to effectively work with communities to solve problems.

Strained police-community relations require extra effort and time to repair

A 2022 study of policing best practices says police departments must reinforce and repair relationships with the community — by creating a “felt presence” — before they can address conditions that impact how the public perceives safety and crime.48

Deploying officers to walk patrols and spend time addressing community concerns helps connect police with residents in non-emergency capacities. Police officers can connect with the community by conducting proactive tasks while on patrol such as talking to people or meeting business owners. Proactively engaging with the community helps in crime prevention while building strong relationships with the communities the officers serve.

Staffing shortages, however, make it difficult for police departments to commit officers’ time to such proactive efforts.49 Understaffed police departments cannot stop or reduce their response to 911 calls or other calls for service — so without appropriate staffing, tasks like proactively connecting with the community may not happen. Therefore, having a sufficiently staffed police force is needed to ensure effective community policing.

49 IntegrAssure Inc. and the National Policing Institute.
To ensure law enforcement agencies devote enough time to proactive tasks, best practices recommend police officers spend no more than 60% of their time answering calls for service, following the “Rule of 60.” According to that standard, when officers spend more than 60% of their time on service calls, it could indicate that the agency is overburdened. When officers spend more time on service calls, they do not have sufficient time to proactively engage with the people they serve.

In Denver, the police department has defined goals for how officers should spend their time each day:

- 35% on officer-initiated activities, such as proactive community policing.
- 35% responding to service calls, including 911 emergencies.
- 30% on administrative duties, like writing reports.

The department uses its computer-aided dispatch system to record how each officer spends their time in each of these areas. Furthermore, officers’ annual evaluations include these goals as part of assessing officers’ performance. This aligns with leading practices that say officers’ performance evaluations should consider how officers interact with their community.

We sought to independently assess how well the Denver Police Department adheres to its stated performance goals for officers’ work time. We reviewed data from 2017 through 2021, and as seen in Figure 5 on the next page, we found the department met its 35% goal for proactively engaging with the community in 2018 — but not in any other year we reviewed. Meanwhile, time spent on 911 calls consistently exceeded the department’s goal.

Denver Police Department officials told us officers have not met their goals for time spent on proactive tasks because officers have had less availability to focus on such duties given an increase in calls for service and staffing shortages within the department. Because officers cannot prioritize proactive tasks like community policing with the department’s current staffing levels, the department cannot engage with the community in a way that fulfills the department’s goals for officers’ work time.

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**THE ‘RULE OF 60’**

Responding to 911 calls and other calls for service should account for no more than 60% of an officer's patrol time, while the remaining 40% should be reserved for other duties. This allows officers to balance addressing community problems and focusing on wellness.

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Because proactive tasks cannot be prioritized at current staffing levels, Denver police are missing out on opportunities to engage with the community.

Because officers must spend more time responding to 911 calls, the department is having to be reactive — leaving less time for officers to proactively create a “felt presence” within the community, as recommended by policing best practices. When residents cannot regularly interact with police in a way that fosters positive relationships, the public’s perception of police will continue to be poor and community-police relations will remain strained.

That is why it is crucial for the Denver Police Department to develop a comprehensive strategy to prioritize community policing, in line with both its own mission and goals and leading practices for law enforcement.

The Denver Police Department does not have a strategic plan for community policing

Guidance from the U.S. Department of Justice’s Office of Community Oriented Policing Services says that when police agencies develop comprehensive plans for community policing, department officials should consider environmental factors that affect not only the officers, but the community.

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**FIGURE 5. Percentage of officer time spent on assigned duties, 2017-2021**

<table>
<thead>
<tr>
<th></th>
<th>911 DISPATCH TIME</th>
<th>COMMUNITY POLICING</th>
<th>ADMINISTRATIVE TIME</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GOAL</strong></td>
<td>35%</td>
<td>35%</td>
<td>30%</td>
</tr>
<tr>
<td>2017</td>
<td>51%</td>
<td>32%</td>
<td>17%</td>
</tr>
<tr>
<td>2018</td>
<td>49%</td>
<td>35%</td>
<td>16%</td>
</tr>
<tr>
<td>2019</td>
<td>52%</td>
<td>33%</td>
<td>15%</td>
</tr>
<tr>
<td>2020</td>
<td>55%</td>
<td>31%</td>
<td>14%</td>
</tr>
<tr>
<td>2021</td>
<td>57%</td>
<td>28%</td>
<td>15%</td>
</tr>
</tbody>
</table>

*Note: Our analysis looked at work time for uniformed officers.
Source: Auditor’s Office analysis of data from the Denver Police Department’s computer-aided dispatch system.*

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In addition, the plan should broadly describe the agency’s actions to ensure every officer and staff member embraces the mission of community policing. Generally, a comprehensive community policing plan should:

- Describe the department’s vision and goals.
- Describe roles and responsibilities for everyone in the department.
- List key activities and milestones.
- Define standards and performance metrics for success.

As we mentioned, no such plan exists for the Denver Police Department.

The U.S. Department of Justice’s Office of Community Oriented Policing Services established the Collaborative Reform Initiative for Technical Assistance program in 2011 to guide agencies with significant law enforcement-related issues. As part of that initiative, the Office of Community Oriented Policing Services provides recommendations to improve community policing practices.

To better understand how other major cities might use this federal support to develop comprehensive community policing plans, we reviewed examples for the police departments in San Francisco and Baltimore.

- **SAN FRANCISCO** – The San Francisco Police Department developed and published its community policing plan after a recent federal review of the department’s community policing practices. The San Francisco Police Department’s plan discusses how the agency:
  - Develops community policing action plans to most effectively meet the objectives for each of its districts.
  - Monitors activities and the impacts of community policing.
  - Uses existing data sources.
  - Describes new data sources.

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San Francisco’s plan also provides survey examples that track the department’s success in various community policing efforts.

- **Baltimore** – The Baltimore Police Department’s community policing plan includes the agency’s vision for community policing and provides details on departmentwide initiatives. The plan also outlines strategies and actions that describe how the Baltimore Police Department plans to achieve its goals.

Like San Francisco’s community policing plan, Baltimore’s plan highlights surveys to gauge the public’s perception of the department and assess the effectiveness of community policing measures.

Without its own documented, comprehensive, and community-informed strategy, the Denver Police Department cannot ensure its community policing efforts are successful and it will struggle to develop strong partnerships necessary for building public trust. Current community policing efforts will also remain fragmented across the city.

Additionally, having a documented community policing strategy would help the department honor its mission of “preventing crime and increasing public trust while honoring the responsibilities granted to us by those we serve, with continued focus on partnerships, learning, and innovation.”

Furthermore, without properly assessing the effectiveness of its community policing programs, police department officials cannot measure — or adequately understand — the public’s perception toward the department to appropriately gauge community buy-in and assess the long-term impacts of its efforts.

### 1.2 RECOMMENDATION

**Develop, document, and implement a comprehensive, strategic community policing plan**

The Denver Police Department should develop, document, and implement a comprehensive, strategic community policing plan that details priorities, roles and responsibilities for officers and staff, key activities and milestones, and performance metrics to measure success. This plan should align with policing best practices, such as those from the U.S. Department of Justice’s Office of Community Oriented Policing Services. The plan should also include ways to gain feedback from community members, such as through citywide surveys.

**AGENCY RESPONSE — AGREE, IMPLEMENTATION DATE — JULY 1, 2023**

SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.

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61 The Baltimore Police Department’s community policing plan was developed because of an April 2017 consent decree with the U.S. Department of Justice. A consent decree is a court enforceable agreement to resolve a police department’s patterns of misconduct. “City of Baltimore Consent Decree,” City of Baltimore, accessed April 10, 2023, https://consentdecree.baltimorecity.gov.

Once Recommendation 1.2 is implemented, the Denver Police Department should effectively communicate its comprehensive, strategic community policing plan to all officers and staff, as well as external stakeholders, to promote clear understanding and support of the department’s vision, in line with policing best practices.

**AGENCY RESPONSE – AGREE, IMPLEMENTATION DATE – NOV. 3, 2022**
SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.
SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS.

The Denver Police Department should develop and document a method to measure the success of its community policing efforts and conduct community surveys to gather information from the public and gauge the public’s perception of the Denver Police Department. The department should then publish all community survey results.

**AGENCY RESPONSE – AGREE, IMPLEMENTATION DATE – APRIL 24, 2023**
SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.
SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS.

**The recruiting unit lacks a comprehensive program to maximize recruitment efforts**

As of January 2023, the Denver Police Department’s four-person recruiting unit did not have a detailed and comprehensive program to guide the department’s recruitment efforts. Without a comprehensive recruitment program, the recruiting unit cannot accurately determine progress toward its long-term goals or determine whether its efforts are effective in increasing applications for job openings.

Federal guidelines say “sound program design and performance management are the basis for the effective and efficient” use of an organization’s resources.63 By following leading practices for program design, department staff could more “effectively advance” the police department’s strategic goals.

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The recruiting unit's program and performance management plan is missing essential details

The recruiting unit's current program for recruitment lacks critical details on how the unit plans to achieve goals and communicate its progress. Specifically, the recruiting unit does not have metrics, data, or a finalized plan to track the number of people applying for Denver Police Department positions.

From late 2019 through 2021, the police department reorganized the recruiting unit with new staff, which caused the department to lose crucial institutional knowledge. When it was reorganized, the unit lost any policies or procedures the previous staff were using.

Since then, current staff members in the recruiting unit have made several efforts to develop a new recruitment program to address the department's problem of understaffing. These include identifying key barriers to recruitment, determining goals for the unit to accomplish, and developing the unit's own mission statement. While the unit's efforts align with some leading practices for program design and performance management, they fall short of maximizing effectiveness.

Specifically, the documents developed as of January 2023 often did not include:

- Specific strategies for accomplishing unit-level goals.
- Specific objectives or metrics for measuring progress toward those goals.
- Specific information on how staff plan to collect data, learn from the collected data, and improve the overall recruitment process.

Leading practices provide a roadmap for effective program design and performance management

Federal guidance on program design provides specific steps the recruiting unit could use to build a comprehensive recruitment program. When followed in consecutive order, these five steps — as shown in Figure 6 on the next page — could empower the recruiting unit to properly reexamine, develop, and manage the Denver Police Department's recruitment program.⁶⁴

This would also enable the recruiting unit to retain institutional knowledge for the future, ensure accountability toward achieving defined goals, and clearly communicate the program with department leaders, staff, and other stakeholders.⁶⁵

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⁶⁴ U.S. Department of State.
⁶⁵ U.S. Department of State.
**FIGURE 6. General steps in program design**

1. **Align programs to advance existing strategies**
2. **Conduct a situational analysis**
3. **Design a program**
4. **Manage performance**
5. **Analyze, learn, act**

*Source: Designed by Auditor’s Office staff using U.S. State Department guidance.*

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**STEP 1: ALIGN PROGRAMS TO ADVANCE EXISTING STRATEGIES** – To start the program design process, leading practices recommend managers consider current organizational goals from an organizationwide strategic plan. Managers can then use these to determine how the specific program would best advance existing strategies or goals.66

In the case of the Denver Police Department, officials told us they need to increase the number of patrol officers so they can meet the demand for law enforcement services across the city. As staffing remains a large concern for the Denver Police Department, it is important for the recruiting unit to align its program with departmentwide goals — such as prioritizing ways to increase the number of applicants for open officer positions.

**STEP 2: CONDUCT A SITUATIONAL ANALYSIS** – Situational analyses involve a “comprehensive review of the current state or conditions surrounding the program” that could affect its “design, implementation, or outcome.”67 Such analyses are crucial for program design. They provide context on past and present factors, an understanding of why these factors exist, and what steps need to be taken to account for them.

Federal guidance describes four consecutive steps necessary for conducting a situational analysis:

1. An internal assessment that provides context for the organization’s capabilities — such as available funding, time, or staff.
2. An external assessment that evaluates outside factors that may impact the program — such as political or legal factors, cultural factors, or economic factors.
3. A root cause assessment that identifies the source of problems or issues the program will eventually help to address.
4. An issue review that uses the results from the internal, external, and root cause assessments to create a holistic picture of the issue the organization is attempting to solve.68

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66 U.S. Department of State.
67 U.S. Department of State.
68 U.S. Department of State.
As of January 2023, staff in the Denver Police Department had done internal and external assessments. But the recruiting unit did not provide sufficient evidence that staff had done a root cause assessment or an issue review. These are significant because leading practices emphasize that program designers should repeatedly ask why a specific symptom is happening until staff determine the original cause.69

**STEP 3: DESIGN A PROGRAM** – Program design itself can be broken into four components, as shown in Figure 7.70

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**FIGURE 7. Basic elements of program design**

1. **DEVELOP A PROBLEM STATEMENT** – A problem statement is a “clear description of the issue, challenge, or need the program seeks to address and serves as the program’s focus.”71 Program designers should use the situational analysis from Step 2 to inform the problem statement.

2. **DEVELOP PROGRAM GOALS AND OBJECTIVES** – Program goals are usually broad, overarching statements that explain a program’s overall intent or purpose. They are not necessarily defined by a specific time frame. Program objectives, on the other hand, are narrower, more specific, and are defined by a specific time frame.

   Objectives should specifically state the desired outcome that will help to accomplish the program’s associated goal. Objectives should be specific, measurable, achievable, relevant, and time-bound, according to leading practices.72

3. **DEVELOP A LOGIC MODEL AND THEORY OF CHANGE** – Leading practices recommend program leaders identify short- and long-term outcomes — including specifically what the program wants to achieve, what the program will produce, what the program does, and what will be invested into the program.73

Together, each of these pieces allow program designers to develop a “theory of change” — an “evolving set of theories about how and

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69 U.S. Department of State.
70 U.S. Department of State.
71 U.S. Department of State, 25.
72 U.S. Department of State, 28.
73 U.S. Department of State, 30 and 36-37.
why a specific program will work that can be tested and improved over time. Once complete, these factors should provide program designers with the necessary information to summarize why certain changes will lead to specific outcomes.

4. DEVELOP A PROGRAM SUMMARY – A program summary is a high-level overview of the program’s key considerations, its goals and objectives, and the plans to achieve them. Program summaries also help leaders communicate the program to management, staff, and outside stakeholders — and they help ensure the program’s longevity if the organization experiences turnover.

As of January 2023, the recruiting unit had developed some, but not all, of the components recommended for program design. While the recruiting unit had a problem statement, that statement lacked specific details that leading practices recommend staff identify. For example, the statement did not contain details about or address demographics of who might benefit from a defined recruitment program, the root causes of why the department may be experiencing low recruitment levels, or how that issue may affect future job applicants.

Additionally, while the unit had goals, objectives, and strategies, these efforts fell short when compared to leading practices. Specifically, our analysis of the recruiting unit’s 11 objectives found that about half were not linked to actionable steps — meaning staff either did not develop or did not document a plan to accomplish the objectives.

STEP 4: MANAGE PERFORMANCE – Performance management planning is an ongoing process that takes actual program outcomes and compares them to anticipated outcomes. Doing so allows program designers to continuously improve a program’s efficiency and effectiveness using monitoring and evaluation tools.

Monitoring activities involve developing performance indicators to track progress and to compare actual results to expected results. Evaluation activities involve collecting and analyzing information about the “characteristics and outcomes” of the program to improve its overall effectiveness.

The recruiting unit’s program summary lacks detailed methods to evaluate the success of the unit’s work and allow managers and staff to determine whether the objectives accomplish the established goals. For example, one of the Denver Police Department’s objectives seeks to have 30% of all uniformed officers be women by 2030. However, the recruiting unit — the primary entity responsible for the department’s recruitment efforts — has no strategies or performance management indicators to reach this goal. Because the unit lacks these defined details, staff cannot accurately track and evaluate their progress.

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Among the recruiting unit’s 11 objectives, about half were not linked to actionable steps.

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74 U.S. Department of State, 36.
75 U.S. Department of State, 37.
76 U.S. Department of State.
STEP 5: ANALYZE, LEARN, ACT – The final step in program design and performance management is to analyze monitoring and evaluation data and use that analysis to forecast results.

Such analysis can then improve program performance, inform current and future program decisions, or even maintain program accountability using the gathered data. According to leading practices, staff should also check the data for accuracy and quality. After completing the analysis, program designers should adjust the program as needed and communicate results and conclusions with relevant stakeholders.77

As discussed, the recruiting unit’s current program summary lacks details on how staff plan to evaluate progress toward objectives or goals. Furthermore, the unit has no defined data collection strategies or methods.

Staff created data collection tools for in-person events, such as job fairs. However, data collection should be expanded beyond job fairs to address the different goals listed in the unit’s program summary.

While the recruiting unit developed some goals, objectives, and strategies to guide its efforts, these lack sufficient detail for optimal effectiveness, and the unit’s program design does not include any monitoring or evaluation activities as recommended by leading practices. Additionally, the unit has no guidance for how staff plan to adapt objectives or strategies based on data collected during the program’s implementation.

Because of this, the recruiting unit cannot sufficiently determine whether it has maximized its recruitment efforts. If the Denver Police Department does not achieve its recruitment goals, the department will continue to face staffing shortages and it will be less prepared to provide effective services to the city — which could put officers and community members at risk.

1.5 RECOMMENDATION Review and update the recruitment program

The Denver Police Department should review and update the design of its existing recruitment program to align with leading practices. This review should follow and document each step of program design and performance management, in consecutive order, as discussed in the finding.

AGENCY RESPONSE – AGREE, IMPLEMENTATION DATE – AUG. 1, 2023
SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.

77 U.S. Department of State.
1.6 **RECOMMENDATION**

**Develop communication procedures**

The Denver Police Department should develop formal procedures to communicate with relevant stakeholders about how well the recruitment program is working and about any plans to improve the program's performance in the future.

**AGENCY RESPONSE** – AGREE, IMPLEMENTATION DATE – OCT. 26, 2022

SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.

SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS.

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**The police department’s staffing model is outdated**

Police departments must understand how many and what types of positions they need to appropriately achieve goals for public safety and effectively serve their communities. They can gain this knowledge by using a staffing analysis to identify the number of officers needed to provide a “peak level of service” during day-to-day operations.78

The Denver Police Department’s staffing model as of January 2023 was based on data from over a decade ago and did not align with best practices that say staffing models should be based on officers’ current workloads. Guidance on police staffing says a workload-based methodology is the most accurate and reliable predictor of police staffing levels.79

Increasing response times among patrol officers prompted department officials to reevaluate their internal staffing model, among other actions they are taking to address rising response times. This presented an imminent need for the department to use an evidence-based approach to assessing its staffing needs using current data.

While the department is now developing a new staffing model, officials were still using the outdated analysis as of December 2022. Officials said the new staffing model will be based on officers’ workloads, consider best practices, and use a scientific approach to staffing.

By contrast, the department’s outdated staffing analysis relies on data from 2008 through 2012, so it does not consider current needs or resources — such as reflecting that Denver’s population grew by 19% from 2010 to 2020. In that time, the city’s population rose from about 600,000

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79 International City/County Management Association.
residents to more than 711,000, census data shows.\textsuperscript{80}

The police department's outdated staffing analysis was performance-based and built on four key performance indicators: the crime rate, high-priority call response times, solving cases, and preventing traffic crashes. These metrics were derived from mathematical relationships between each other, and the department used those relationships to determine the amount of officers it needed to perform its best in those categories. However, leading practices say using crime rates as a measure to staff patrol officers is not practical because crime rates are influenced by many other factors than just staff resources.\textsuperscript{81}

Meanwhile, a workload-based staffing model would consider calls for service as well as targeted percentages of time spent responding to calls and time devoted to proactive tasks.

The department has relied on the outdated model to determine its “authorized strength” for the city’s annual budget — that is, the total number of uniformed officer positions approved and budgeted for.\textsuperscript{82} Officials said the current authorized strength of 1,464 officers is still “defensible” — although they have not updated the staffing analysis or the budgeted staffing numbers since 2019 because of the COVID-19 pandemic’s impact on the department.

Instead, the department reactively shifted resources during the pandemic to manage workloads while remaining consistently understaffed.

By comparison, we noted that the police departments in San Francisco and Baltimore both use the recommended workload-based analysis to determine their staffing needs.\textsuperscript{83} Those cities’ departments regularly review whether their staffing determinations are still able to address community needs.

\textsuperscript{80} “Denver city, Colorado,” QuickFacts webpage, U.S. Census Bureau, accessed March 7, 2023, https://www.census.gov/quickfacts/fact/table/denvercitycolorado/PST045221. We used the U.S. Census Bureau’s actual population totals for 2010 and 2020.


One way understaffed agencies can help ensure they provide appropriate law enforcement services for their communities is by diverting certain tasks to civilian — or non-officer — employees. Using civilian staff can help a department reserve uniformed officers’ time for responding to calls for service and community policing.\textsuperscript{84}

Federal guidance on law enforcement says civilian staff can:

- Work in administrative roles.
- Be uniformed first responders to nonviolent calls for service.
- Process evidence and work in forensic crime labs.
- Provide victim services in the field.
- Work as analysts, researchers, and planners.
- Be community liaisons and public information officers.
- Serve as command staff and other strategic leaders.\textsuperscript{85}

While civilian staff cannot do the police work uniformed officers can, their specialized skills in other areas can be valuable to an agency’s operations. For example, trained civilian personnel can be effective in crisis intervention.\textsuperscript{86}

For 2022, the Denver Police Department had 336 civilian staff positions budgeted.\textsuperscript{87} Examples of how the department employs civilian staff include:

- Report technicians who investigate and document property crime and vehicle crashes.
- Data analysts who analyze citywide crime trends and prepare reports for department leaders.
- Crime scene investigators who respond to crime scenes to collect evidence for processing.
- Forensic lab technicians who process drugs, latent fingerprints, shell casings, and other evidence.
- Real-time crime center operators who monitor an array of cameras and other technology throughout Denver to provide real-time information to uniformed officers.
- Property and evidence technicians who receive, document, and preserve evidence turned over for storage and processing.


\textsuperscript{85} William R. King and Jeremy M. Wilson.


Community engagement program managers who coordinate and facilitate various community policing initiatives and engagement events in each of the six patrol districts.

- Outreach case coordinators who connect crisis victims to long-term solutions.

- Other professional staff in charge of key functions such as the crime lab, victim services, strategic initiatives, and community engagement.

Although the Denver Police Department is working on a new staffing model, the lack of an up-to-date model has left the department unable to accurately determine what resources it needs to effectively accomplish its goals.

Continuous understaffing further risks the department being unable to provide necessary services to the community, promptly respond to 911 calls and non-emergency calls, and sufficiently prioritize community policing efforts that could bolster the public’s perception of law enforcement and enhance public safety.

A new staffing model would allow the department to determine its actual staffing needs, particularly in line with its goals for community policing. With the knowledge of its true staffing needs, the department can better ensure police-community relationships are strengthened while improving officers’ response times to calls for service.

### 1.7 RECOMMENDATION

**Finalize and implement new staffing analysis**

The Denver Police Department should finalize, implement, and communicate its new staffing analysis in line with leading practices. This should include:

- Completing a formal, documented staffing analysis that is based on data about officers’ current workloads.

- Reviewing and updating the staffing analysis as necessary on a consistent basis.

- Assessing how best to use civilian staff and alternative response programs to respond to calls for service that could supplement resource needs.

**AGENCY RESPONSE** – AGREE, IMPLEMENTATION DATE – DEC. 1, 2022

SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.

SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS.
FINDING 2 AND RECOMMENDATIONS

The Denver Police Department does not have effective strategies to understand and address low retention

Like many local law enforcement agencies across the country, the Denver Police Department faces increasing staff shortages and turnover. Denver’s former police chief, who left in October 2022, told us understaffing creates the biggest barrier to the operational success of the police department.

Several issues contribute to low retention. Some outside factors — such as recent changes in state law meant to provide more accountability for local law enforcement — are out of the police department’s control. However, internal causes of low retention are within Denver Police officials’ ability to address.

We found the Denver Police Department does not have effective procedures to determine its internal causes of low retention nor does it have strategies to address them. Internal causes might include a lack of diversity among officers, increased stress because of the department’s ongoing staffing shortages, low morale, and officers’ desire to leave law enforcement altogether for a better work-life balance.

If police department officials do not effectively identify and address these internal causes, they cannot make meaningful changes based on officers’ feedback — particularly from female officers and officers of color — to improve low retention rates and boost officers’ morale.

The police department struggles with low retention and low morale

Turnover among uniformed officers in the Denver Police Department has increased since 2020, particularly among senior officers. While various factors can affect retention, recent surveys during this audit indicate low morale among officers is one within the department’s control.

Staffing shortages and turnover among officers have increased in recent years

The department’s own workforce data quantifies the increasing staff shortages and turnover facing the Denver Police Department.

We reviewed data from 2019 through 2022 and compared trends among 700-800 uniformed patrol officers. Uniformed officers are those with a Colorado Peace Officer Standards and Training certification. They include,

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88 The Criminal Justice Section of the Colorado Attorney General’s Office manages the certification and training of all active law enforcement officers in Colorado. It also investigates reports of certification violations.
among others, patrol officers, supervisors, and investigators. Patrol officers are those assigned to patrol areas of the city, and they are most likely to respond to emergency calls.

As shown in Figure 8, turnover among uniformed officers has notably increased over that four-year period — from 5.4% in 2019 to 9.5% two years later. In 2022, the turnover rate fell slightly but was still high compared to 2019 and 2020.

**FIGURE 8. Denver Police Department turnover rates and workforce capacity, 2019-2022**

“Workforce capacity” refers to the percentage of officers the department employed out of how many it was authorized to have in that year’s city budget.

- **Workforce capacity, all sworn officers**
- **Workforce capacity, patrol officers only**
- **Turnover rate, all sworn officers**

Source: Auditor’s Office analysis of data from the Denver Police Department.

Meanwhile, the department’s workforce capacity — that is, the percentage of officers it has in a year out of how many the city budget authorized it to have — has significantly dropped during the same four-year period. This reflects the increasing staff shortages the department has experienced.

For instance, in 2019, the department had 97% of the uniformed officers it was authorized to have. By 2022, that number had dropped to less than 88%. The percentage of patrol officers declined even further — from the department having an excess at over 101% workforce capacity in 2019 down to 86% three years later.

The abrupt changes visible between 2020 and 2021 in both sets of data reflect societal circumstances in that time, which affected law enforcement agencies nationwide. George Floyd was murdered by Minneapolis police in May 2020, prompting widespread racial justice protests and increased scrutiny of policing practices across the country.
To assess Denver's numbers in a broader context, we reviewed staffing levels at several city police departments nationwide and found their average workforce capacity was 89.8% as of December 2022. Based on this, the Denver Police Department's staffing level as of 2022 — 87.9% for all uniformed officers — is generally in line with other agencies we reviewed. This does not mean the Denver Police Department has enough officers to operate effectively — only that its staffing rate is comparable to other agencies we reviewed around the country.

Meanwhile, we looked deeper into the Denver Police Department's staffing data to assess the types of officers who have left since 2019 based on their tenure with the department.

The department defines “police recruits” as new employees who participate in the academy and seek to become certified as a peace officer by the state of Colorado. Once certified, officers are categorized into four grade levels — with Grade 1 being the most senior position. It requires at least 33 months of service. Grade 2 officers are those with 21 months of service, Grade 3 officers have 9 months of service, and Grade 4 officers are those who have just graduated from the police academy.

As shown in Figure 9 on the next page, we found that starting in 2020, most of the officers who resigned from the Denver Police Department were in senior positions.

These resignations include officers who voluntarily left their position for reasons other than retirement. The police department's Deferred Retirement Option Program allows officers and staff who are eligible for retirement to voluntarily stay employed for five more years, which benefits the department by retaining staff and institutional knowledge.
FIGURE 9. Voluntary resignations from the Denver Police Department by job level, 2019-2022

The department categorizes officers based on their length of service with the department. Grade 1 officers are the most senior, while recruits are still attending the police academy.

![Bar graph showing voluntary resignations by job level from 2019 to 2022](image)

Note: These resignations do not include officers who retired.

Source: Auditor’s Office analysis of the Denver Police Department data on employee separations.

Low morale and issues of competitive pay could be contributing to officer turnover

We surveyed uniformed officers to better understand issues related to recruitment and retention. Of the 1,406 surveyed, 289 officers — or 21% — responded. We asked them about morale, stress management, leadership, and retention within the police department. These survey responses and additional interviews we did throughout the audit gave us insight into various factors impacting retention.

While the department cannot control all outside factors, police department officials should nonetheless be aware of these impacts on retention. The most notable outside factors that officers mentioned in responding to our survey were changes to state law since 2020 that require all police officers to wear body-worn cameras and that removed qualified immunity, which protected officers from being personally liable for certain actions while on duty.

Seventy-five percent of the 289 respondents to our survey said the changes to qualified immunity policies would contribute to their decision...
Many of the 130 comments we received about low morale point to burnout, poor leadership, low staffing, and officers feeling undervalued.

to leave the police department. Likewise, 45% said the requirement to wear body-worn cameras would contribute to their decision to leave and 47% said increases in crime would influence their decision.

Other outside factors that department officials told us about during interviews include the city’s COVID-19 vaccine mandates, the racial justice protests following the murder of George Floyd by Minneapolis police, and a negative public perception toward law enforcement.

Through survey results and interviews, we also identified several internal issues affecting retention and turnover — which are within police department officials’ ability to address.

For example: Results of our survey found morale among uniformed officers ranged from “fair” to “poor” — at 52.6% for individual morale and 82.7% for departmentwide morale.

Out of the 289 officers who answered our question about morale, we received over 130 written responses providing reasons for the low morale. Many of these comments point to burnout, poor leadership, low staffing, and officers feeling undervalued. Notably, 16% of the 289 respondents said they do not intend to stay with the department for at least the next year.

About every two years, the City and County of Denver conducts an engagement survey to evaluate city employees’ passion for their work so city leaders can identify where to take meaningful action. The police department’s results from 2022 showed that a fear of retaliation from management could also influence officers’ decisions to leave the department.

The specific survey results we reviewed — which showed results only for the police department — asked whether employees felt they could provide their opinions without fear of retaliation. Only 49% of respondents replied favorably.

Figure 10 on the next page shows the top five most favorable and least favorable responses from police department staff who answered the 2022 citywide engagement survey.

We also evaluated officer salaries among local police departments in Colorado to determine whether differences in pay might be a factor in the Denver Police Department’s low
We found other local departments offer higher salaries — sometimes by more than 10% — for uniformed officers with one to three years’ experience. These differences in salary could affect officer retention for Denver.

FIGURE 10. Snapshot of police department responses to Denver’s 2022 employee engagement survey

<table>
<thead>
<tr>
<th>Most favorable</th>
<th>Least favorable</th>
</tr>
</thead>
<tbody>
<tr>
<td>I understand my own role and responsibility regarding my career development.</td>
<td>In my department, an employee’s career growth depends on experience and skill rather than personal background.</td>
</tr>
<tr>
<td>87%</td>
<td>45%</td>
</tr>
<tr>
<td>I understand how the work I do relates to the success of the city.</td>
<td>I am paid fairly for the work I do given my experience and skills.</td>
</tr>
<tr>
<td>86%</td>
<td>46%</td>
</tr>
<tr>
<td>The work I perform for the city is meaningful.</td>
<td>My department promotes a culture and environment of appreciation.</td>
</tr>
<tr>
<td>85%</td>
<td>47%</td>
</tr>
<tr>
<td>I understand how the work I do relates to the overall goals and priorities of my department.</td>
<td>I believe that senior leadership can resolve employee challenges related to diversity issues.</td>
</tr>
<tr>
<td>85%</td>
<td>48%</td>
</tr>
<tr>
<td>I intend to stay with the city for at least another 12 months.</td>
<td>In my department, I provide my opinions without fear of retaliation or retribution.</td>
</tr>
<tr>
<td>79%</td>
<td>49%</td>
</tr>
</tbody>
</table>

Source: Auditor’s Office analysis of the City and County of Denver’s 2022 employee engagement survey.

Denver’s new police chief, who was appointed in October 2022, has implemented a few ways to identify internal issues contributing to the department’s retention issues, such as by creating a morale committee. The committee — made up of various police officers — seeks to discuss ideas and provide input on how to address the department’s morale issues. Because such initiatives are still new, department leadership will need more time to determine how effective these are at addressing retention.

The International Association of Chiefs of Police stresses that police department officials should understand specific reasons why some officers leave before they develop appropriate retention strategies. In addition, management should involve officers in identifying reasons for low

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89 We did not review the total compensation packages for each local police department we looked at, only the ranges for officers’ salaries. In addition to an officer’s take-home pay, a total compensation package might include educational opportunities, working different shifts, insurance premiums, retention bonuses, and city-funded retirement contributions.

Retention, and the department should ask employees questions when they leave to understand what is important to them.

Retention efforts should optimize factors that attract officers to the department while limiting issues that cause officers to leave. Policing best practices offer strategies such as providing a realistic understanding of job requirements, offering competitive salaries, providing adequate training opportunities, and obtaining employee feedback. Officers should also have opportunities for promotion, growth, and recognition.

If police department officials do not sufficiently address underlying issues within their control that are causing the increases in turnover and ongoing staffing shortages, the department will continue to operate ineffectively — potentially putting officers and the public at risk.

2.1 RECOMMENDATION

The Denver Police Department should develop and document processes to identify the primary causes for low retention. It should then develop and implement effective retention strategies based on policing best practices.

AGENCY RESPONSE – AGREE, IMPLEMENTATION DATE – MAY 1, 2023
SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.

The police department does not effectively collect information to determine reasons for increased turnover

Police department officials do not have enough information to fully understand why officers are leaving the department, because they are not gathering data points they need to be informed about this nor are they effectively assessing the information they do have.

What data the department does collect is minimal and it is not always appropriately analyzed for trends.

Officials are not appropriately collecting and analyzing employee feedback on retention-related issues

Employee surveys can help an organization improve by giving staff a voice to anonymously raise concerns to management. However, employee surveys are only successful when managers analyze and use the

Employee surveys are only successful when managers analyze and use the information to make appropriate changes.

The City and County of Denver's citywide engagement survey seeks to evaluate employees' overall dedication and connection to their work every two to three years. All City and County of Denver employees are asked to respond to broad questions about topics like career growth, leadership, and recognition.

We noted the response rate for police department staff has steadily decreased with each survey since 2017:

- 2017: 57%.
- 2019: 45%.
- 2022: 31%.

While the city asks some questions about factors leading to poor retention, the survey does not include law enforcement-specific questions or ask about some factors, such as addressing generational differences among police officers. Police department officials said they have some processes outside the citywide engagement survey to receive employee feedback — such as an anonymous email account that goes directly to the chief.

They acknowledge a formal department-specific survey about retention issues may be an effective way to collect more targeted information.

Surveys that are specifically developed for a department may be more beneficial than using a general survey. An internal survey can and should be tailored to meet the needs of the department.

Without appropriately collecting and analyzing employee feedback about the department's retention-related issues, the department cannot properly identify and address issues affecting the department's low retention and staffing shortages.

Officers who leave their jobs present an opportunity for managers to understand reasons for turnover. To that end, the police department distributes exit surveys to departing staff. Exit surveys are voluntary and serve as the department's only formal way to collect information from departing officers — but few officers complete the survey before their last day of work.

Furthermore, no one analyzes the information the department collects from these individuals so that officials can make informed decisions on how the department can best address retention and reduce turnover.

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93 The citywide engagement survey was postponed in 2021 due to the COVID-19 pandemic.

The Department of Public Safety oversees human resources-related matters for the Denver Police Department. This includes conducting the exit surveys, which ask departing officers questions about what may have led to them leaving — like issues of burnout, leadership, and career development.

Exit surveys are automatically sent to an officer’s inbox — through the city’s system of record, Workday — when they decide to leave the department. However, system access is removed after an officer’s last day, so they can no longer access or take the exit survey. This limitation could prohibit potential responses the department might benefit from.

We reviewed all exit surveys from uniformed officers who left the Denver Police Department in the last two years. Only 14 of the 268 uniformed officers who left in that time completed an exit survey, a response rate of 5%.

Before 2021, the Department of Public Safety had contracted with a human resources research firm, People Element, to collect information from departing staff. Because of pandemic-related budget cuts, the department ended its contract with that vendor and began using Workday to administer the exit survey process.

Public Safety officials told us the response rate for exit surveys through People Element was between 35% and 40% — seven to eight times higher than the 5% response rate the department has through Workday. Officials said officers preferred People Element overall and valued certain features not available in Workday, like People Element’s staff following up on survey questions after officers left their jobs.

The Department of Public Safety asked for up to $40,000 in 2023 to contract with People Element again. The request said that contracting with People Element would help the police department retain a diverse staff and it would provide accurate exit interview data that would help Public Safety officials improve retention and survey engagement. As of December 2022, the department did not have confirmation on whether the funding request was approved.

Despite the police department recently implementing ways to obtain feedback from current officers, these processes remain informal, undocumented, and inconsistently applied across the department. Guidance from the International Association of Chiefs of Police says law enforcement agencies cannot determine appropriate retention strategies without knowing first why officers are leaving.²⁵

Additionally, leading practices in human resources say information collected from departing employees can provide valuable insight into whether an organization’s programs are working and where improvements can be made to help retain quality staff. Once collected, though, the

information should be analyzed and included in strategic planning, management improvements, recruiting strategies, and a yearly strategic review process.\textsuperscript{96}

If the Denver Police Department does not create and implement a formal process to regularly gather and analyze data on how officers feel about their jobs and why they are leaving, officials will not have the knowledge they need to understand trends in turnover. As a result, the department will continue to struggle with officer retention.

<table>
<thead>
<tr>
<th>2.2</th>
<th>RECOMMENDATION</th>
<th>Improve survey response rates and take meaningful action</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Denver Police Department should work with the Department of Public Safety to choose and implement an effective way to gather feedback from current officers and staff, such as contracting with People Element. Once implemented, department officials should use the information to take meaningful action to enhance retention.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

AGENCY RESPONSE – AGREE, IMPLEMENTATION DATE – JULY 1, 2023
SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.

<table>
<thead>
<tr>
<th>2.3</th>
<th>RECOMMENDATION</th>
<th>Develop employee retention strategies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Once the Denver Police Department identifies the primary causes of low retention, as specified in recommendations 2.1 and 2.2, the department should develop and implement employee retention strategies using best practices.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

AGENCY RESPONSE – AGREE, IMPLEMENTATION DATE – MARCH 3, 2023
SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.

<table>
<thead>
<tr>
<th>2.4</th>
<th>RECOMMENDATION</th>
<th>Review exit survey results</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Denver Police Department should develop, document, and implement a process to regularly review and analyze trends in feedback from departing officers and staff using their responses to the department’s exit survey.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

AGENCY RESPONSE – AGREE, IMPLEMENTATION DATE – JULY 1, 2023
SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.

The police department lacks specific goals to ensure the diversity of its officers reflects Denver. Part of addressing low retention within a police department involves improving the diversity among officers and improving the culture of policing. Leading practices say a department’s workforce should be representative of the community it serves.

In comparing demographic data between Denver’s 700 or so patrol officers and the Denver population at large, we noted the race and ethnicity of patrol officers closely reflects the city’s residents. However, as shown in Figure 11 below, our analysis revealed disparities in gender. While women represent half of the city’s population, they comprise less than 19% of Denver’s patrol officers.

We also compared the proportion of resignations among female officers to the percentage of female officers in the police department. We found that since 2017, female officers have resigned at a disproportionate rate, as shown in Figure 12 on the next page. Specifically, although female officers made up 19.6% of the department’s patrol staff in 2022, 23.4% of resignations as of November were by women.

The disproportionate number of resignations by female officers further perpetuates gender inequities within Denver’s police department.

Police officials are aware of issues regarding diversity among officers within the department. In applying for a state grant last year, they noted their desire to increase diversity — saying “women and officers of color do not see viable career paths or access to opportunities.”

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FIGURE 11. Comparing demographics of Denver Police Department patrol officers and Denver residents

<table>
<thead>
<tr>
<th>PATROL OFFICERS</th>
<th>Male</th>
<th>Female</th>
<th>White</th>
<th>Black</th>
<th>Hispanic</th>
<th>Asian</th>
<th>Other ethnicities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>81.3%</td>
<td>18.7%</td>
<td>58.9%</td>
<td>8.7%</td>
<td>25.1%</td>
<td>3.8%</td>
<td>3.5%</td>
</tr>
<tr>
<td>Female</td>
<td>18.7%</td>
<td>81.3%</td>
<td>41.1%</td>
<td>11.3%</td>
<td>41.1%</td>
<td>3.5%</td>
<td>3.5%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CITY OF DENVER</th>
<th>Male</th>
<th>Female</th>
<th>White</th>
<th>Black</th>
<th>Hispanic</th>
<th>Asian</th>
<th>Other ethnicities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>50.1%</td>
<td>49.9%</td>
<td>54.2%</td>
<td>9.2%</td>
<td>29.5%</td>
<td>3.6%</td>
<td>3.5%</td>
</tr>
<tr>
<td>Female</td>
<td>49.9%</td>
<td>50.1%</td>
<td>45.8%</td>
<td>10.4%</td>
<td>29.5%</td>
<td>3.6%</td>
<td>3.5%</td>
</tr>
</tbody>
</table>

Source: Auditor’s Office analysis using Denver police employee data as of July 2022 and 2021 population estimates from the U.S. Census Bureau.

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Formal strategic planning requires an organization’s leaders to develop a plan after carefully considering numerous factors, constantly communicating with stakeholders, and establishing specific, measurable goals. Best practices say these activities must occur in a specific, consecutive order.99

One of the Denver Police Department’s objectives seeks to have 30% of all uniformed officers be women by 2030. However, there are no strategies or performance management indicators to reach this goal. Because of the lack of defined details, staff cannot accurately track and evaluate their progress.

Results from the city’s 2022 engagement survey also indicate a perception of unfair practices within the police department related to how officers are treated and their career growth. Specifically, the survey asked whether “employees are treated fairly ... regardless of differences in race, gender, and age.” Only 58.3% of police department employees responded favorably — down from 67% in 2019.

When asked whether “career growth depends on experience and skill rather than personal background characteristics” including race, gender, age, sexual orientation, disability, and religion, only 45.2% of police department employees responded favorably. This was a new question in the 2022 survey, so a comparison to prior years is not available. However, citywide, 59.3% of employees responded favorably — indicating this is more of a concern within the police department specifically.

In December 2022, the police department was awarded the state grant it had applied for when officials expressed their desire for more diversity. The department intends to use the $201,000 award — which is good through June 2024 — to hire a marketing firm to assess staffing, organizational structure, performance management, budgeting, and strategic planning. This work is meant to help inform police department officials about strategies that are more likely to attract a more diverse pool of candidates for job postings.

The department also intends to create a program for the police academy that incorporates lessons focused on “interpersonal relationships and wellness before law enforcement tactics.”

Law enforcement best practices say agencies that improve recruitment, diversity, and retention practices “attract and retain officers who comply with department policies, engage respectfully with community members, prevent the escalation of adverse events, and promote more equitable public safety.”

Diversifying Denver’s police department could also improve overall policing culture in the city, as it has benefits beyond improving representation of historically marginalized populations. By improving workforce diversity, the Denver Police Department would better represent the communities it serves.

Furthermore, addressing inequities would also help improve the public's perception of law enforcement and work toward healing distrust between the police and the community.

### 2.5 RECOMMENDATION

| Develop, document, and implement strategies to improve diversity |

As the Denver Police Department develops its comprehensive strategic plan as part of Recommendation 1.2 and its recruiting plan as part of Recommendation 1.4, it should continue to develop, document, and implement diversity goals — including strategies and measures to achieve those goals. These efforts should help ensure the demographics of police officers and staff reflect the Denver communities they serve.

**AGENCY RESPONSE – AGREE, IMPLEMENTATION DATE – MARCH 30, 2023**

SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.

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FINDING 3 AND RECOMMENDATIONS

The Denver Police Department should improve officers’ access to in-house physical therapy and mental health services

Denver’s public safety and police departments generally do a good job with the wellness programs they offer their employees. However, some aspects of the programs could be enhanced to provide greater benefits — to officers within the police department specifically and possibly to all employees under the Department of Public Safety.

We found physical therapy and mental health programs could be expanded to provide greater availability to police officers. The departments could also do a better job communicating the benefits of wellness programs both to existing police officers and staff and to potential recruits.

Because the police department is within the Department of Public Safety, some of its wellness programs are shared with the larger department. However, police department officials said sharing physical and mental health resources with the entire Department of Public Safety often results in long wait times for appointments and prohibits officers from having direct access to preventative services.

A representative from the city’s Risk Management Office and the employee wellness official for the Department of Public Safety shared data that shows addressing the reduced access and availability — particularly with in-house physical therapy services — would help officers return to duty faster than if they had used outside programs. These internal services also provide cost-savings to city in the form of reduced workers’ compensation expenses and potential overtime costs.

Meanwhile, because of limited monitoring and communication about the programs available, some officers may be unaware of the wellness services they can access — and potential recruits may also not know about these benefits of working for the Denver Police Department. That could make a difference if potential recruits are choosing between the Denver Police Department or other nearby police agencies.

THE DEPARTMENT OF PUBLIC SAFETY
Denver’s Department of Public Safety oversees several agencies and programs, including:
• The Denver Police Department.
• The Denver Fire Department.
• Denver 911.
• The Denver Sheriff Department.
• Community corrections.
• Public safety youth programs.
• The Gang Reduction Initiative of Denver.
Informing officers and recruits of all available benefits may help increase the number and quality of potential recruits and alleviate staffing shortages.

The physical therapy and mental health programs should be expanded to increase availability

Mental and physical health resources are critical to the wellbeing of law enforcement officers. The Denver Police Department — in collaboration with the Department of Public Safety as a whole — offers several wellness programs to support officers’ physical and mental health, as we described in the background.

We found opportunities for the police department to expand these services for the betterment of its officers and, by extension, the communities they serve. Without adequate availability and access to these services, law enforcement officers are at greater risk of injury, making poor decisions, and even dying by suicide.

LACK OF AVAILABLE PHYSICAL THERAPY SERVICES – Within the Department of Public Safety, Denver’s police and sheriff departments share a physical therapy program, which helps law enforcement officers who have been hurt while either on duty or off duty. The Public Safety wellness official told us the number of injuries requiring physical therapy is increasing, highlighting the need for more availability in services.

For example, 2021 and 2022 both saw an increase in more significant claims — including from shootings, major injuries, and mental health distress. Significant injuries can take a psychological toll on officers on top of the physical impacts.

A Public Safety official said that before December 2022, the police and sheriff departments shared only two physical therapists for their combined 2,300 employees. Because these important services were in such high demand, the Department of Public Safety hired a third physical therapist on a temporary basis — using funding from the city’s Risk Management Office. The position could become permanent starting in 2024 with funding through Public Safety.

Officials said Public Safety’s physical therapy program was developed to reduce the severity of workers’ compensation claims and increase employees’ desire to use internal providers — which have proven more effective and less costly than outside services. Officials said about 80% of the city’s workers’ compensation claims come from either the police or sheriff departments.
Figure 13 compares the cost and amount of workers’ compensation claims across the City and County of Denver from 2018 through December 2022 with those for the police department — which is the focus of this audit. Data we reviewed shows uniformed police officers make up roughly a quarter of the city’s workers’ compensation claims and costs each year.


<table>
<thead>
<tr>
<th>Year</th>
<th>Uniformed police officers</th>
<th>Citywide</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>$1.6M (26%)</td>
<td>$5.9M</td>
</tr>
<tr>
<td>2019</td>
<td>$2.3M (19%)</td>
<td>$12.1M</td>
</tr>
<tr>
<td>2020</td>
<td>$1.8M (24%)</td>
<td>$7.5M</td>
</tr>
<tr>
<td>2021</td>
<td>$3.6M (24%)</td>
<td>$14.8M</td>
</tr>
<tr>
<td>2022</td>
<td>$2.3M (26%)</td>
<td>$8.9M</td>
</tr>
</tbody>
</table>

**TOTAL** Uniformed police officers: $11.5M (23%)  Citywide: $49.1M

<table>
<thead>
<tr>
<th>Year</th>
<th>Uniformed police officers</th>
<th>Citywide</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>276 (28%)</td>
<td>998</td>
</tr>
<tr>
<td>2019</td>
<td>294 (27%)</td>
<td>1,080</td>
</tr>
<tr>
<td>2020</td>
<td>397 (26%)</td>
<td>1,527</td>
</tr>
<tr>
<td>2021</td>
<td>352 (28%)</td>
<td>1,252</td>
</tr>
<tr>
<td>2022</td>
<td>286 (27%)</td>
<td>1,066</td>
</tr>
</tbody>
</table>

**TOTAL** Uniformed police officers: 1,605 (27%)  Citywide: 5,923

*Note:* Dollar amounts are rounded to the nearest hundred thousand.

*Source:* Information from Denver’s Risk Management Office.

Meanwhile, the Department of Public Safety’s wellness data shows that employees return to work faster when they use the department’s in-house physical therapists, as illustrated in Figure 14 on the next page.

For example, in 2022, the average recovery time for employees who used an outside provider was 237 days. For those who used the department's in-house physical therapist, recovery time was nearly two and a half weeks less, at 220 days.

The year 2021 is an exception. Recovery times that year were higher for in-house services because of the pandemic and the lack of in-person physical therapy appointments at the time.
FIGURE 14. Average recovery time: in-house services versus outside providers

This shows the average number of days it took a doctor to determine an employee within the Department of Public Safety was at 100% of their normal capacity to return to work. The year 2021 is an outlier because of the pandemic and the lack of in-person physical therapy appointments at the time.

Similarly, Public Safety's wellness data shows that using the department’s in-house physical therapy services significantly reduces the time an employee is unable to work after an injury, compared to when they use an outside provider. As shown in Figure 15 on the next page, in-house services helped employees return to work 47% faster in 2022 than those who used outside services.

Using in-house services further provides direct savings to injured employees. A Public Safety official said outside providers can cost almost twice as much as an internal provider. Figure 16, also on the next page, shows the savings employees within the Department of Public Safety realized when they took advantage of direct access to the department’s physical therapy services.

Since 2017, injured employees collectively saved between $110,000 and $270,000 a year by not seeking outside providers for their care, according to Public Safety’s wellness data.

The use of in-house physical therapy services also saves the City and County of Denver hundreds of thousands of dollars each year in potential overtime costs.

Because the Denver Police Department — like many other police agencies across the country — is increasingly understaffed, officers are having to work more overtime to make up for shift shortages. This is expensive for the city, because overtime pay equals 1.5 times an officer’s regular rate of pay.

Source: Auditor's Office analysis using Department of Public Safety wellness data.
FIGURE 15. Average lost workdays: in-house services versus outside providers
This compares the average number of days an employee within the Department of Public Safety was out of work due to injury.

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

FIGURE 16. Public Safety employees’ annual savings when using in-house physical therapy resources

Source: Auditor’s Office analysis using Department of Public Safety wellness data.
However, as shown in Figure 17, public safety employees’ ability to return to work faster when they use the department’s in-house physical therapy program translates to significant overtime cost-savings.

**FIGURE 17. Overtime savings from the Department of Public Safety’s physical therapy program**

The year 2021 is an outlier because of COVID-19 pandemic restrictions at the time, which restricted in-person physical therapy appointments.

As with the average recovery time we showed in Figure 14, a recent exception was 2021. The city missed out on over $1.4 million in potential savings because COVID-19 pandemic restrictions limited in-person physical therapy appointments.

In addition to helping officers after an injury occurs, having more on-site physical therapy resources would also help officers with preventative care.

Public Safety officials said officers prefer seeing an in-house physical therapist over an outside provider. They also noted that in-house therapists can better understand job-specific needs — which allows therapists to work with officers to get them back into a condition to perform their job. By contrast, outside providers may only get them back to being a “member of the public.”

**LACK OF ADEQUATE MENTAL HEALTH SERVICES** – The Department of Public Safety contracts with a local outside provider for mental health services to support public safety staff and the agencies within the department’s purview. Notably, department officials say Denver is one of the few cities without integrated on-site mental health services. Addressing this would be an extra cost to the city and require additional funding for the Department of Public Safety’s wellness services.
Psychological stress can have serious consequences to an officer's health, such as increased risk of post-traumatic stress disorder, major depression, substance abuse, and dying by suicide.\(^{101}\)

Police Chief Magazine reported that suicide was the 10th highest cause of death in the United States in 2019 and “suicide claims more law enforcement lives than felonious killings or accidental deaths in the line of duty.”\(^{102}\) From 2017 through 2022, over 900 law enforcement officers died by suicide nationwide.\(^{103}\)

Expanding access to mental health and wellness services could help public safety officials — and police department officials, specifically — identify concerns earlier and help officers get the help they need.\(^{104}\) Therefore, in-house mental health services that are adequately communicated, promoted, and easily accessible are critical to ensuring officers' wellbeing and reducing the risk of them dying by suicide.

Officials in both the Department of Public Safety and the Denver Police Department told us they want to hire an on-site mental health specialist and a sports psychologist. A Public Safety wellness official said the department applied for a grant that would enable it to hire two mental health therapists and a sports psychologist but, as of December 2022, they had not heard whether the department would receive the grant. If the department does, the official noted the grant would last for only two years. Therefore, the department would need another source of long-term funding to make the positions permanent.

Absent additional funding, two of the department's physical therapists — who are also doctors — have taken on mental health care roles. The department is working to get them more resources and mental health training.

A Public Safety official told us there have been at least two instances when these services have prevented suicide — increasing the importance for the Department of Public Safety to have its own dedicated mental health services.

The department's wellness strategic plan for 2023 focuses mainly on mental health and preventative physical therapy. Mental health goals involve:

- Enhancing communication and mental health awareness.

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• Removing barriers to access.
• Developing an early intervention system.

The goals for preventative care involve:
• Providing non-punitive wellness screenings.
• Increasing ease of access to preventative services.
• Creating a preemployment screening process.
• Developing an incentive program.

Law enforcement best practices say providing and promoting officer wellness through support services — such as individual counseling or peer-support groups — can increase officer retention. Promoting safety and wellness among officers also requires a “multi-faceted approach” that addresses various topics including physical fitness, mental health, emotional wellness, stress management, financial wellness, peer support, and family support.

Increasing officers’ awareness about behavioral health care can help reduce the stigma often associated with seeking mental health services. Good mental health is just as essential as good physical health for law enforcement officers to be effective in keeping communities safe from crime and violence. Poor mental health can impact officers’ abilities to make good decisions and use good judgment. Federal guidance says the mental health needs of law enforcement officers are often overlooked until something negative happens.

Without adequate physical and mental health services that help keep officers on regular duty and return to duty faster after an injury, the police department will continue to be understaffed — adding to increasing response times, which puts the city and the public at risk. The city could also save more money in potential overtime pay and workers’ compensation claims by enhancing its physical and mental health services.

**Officials should improve officers’ awareness of the police department’s wellness programs**

We found the Denver Police Department inadequately communicates its wellness programs to officers and recruits. The department does not have a comprehensive document that includes descriptions and benefits of

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all wellness programs available. The department also does not track and monitor participation in all its programs.

The police department's operations manual discusses some wellness programs — such as the peer support and resiliency programs and the chaplains unit. But we received no documentation describing the department's physical therapy or mental health services.

A police department official told us they use emails, magnets, and posters to let officers know about the wellness programs. The official also said they talk to incoming recruits in the academy.

But this promotion is not enough to reach all officers. A wellness survey provided by the Department of Public Safety showed many law enforcement officers were unaware of the wellness programs available to them.

The International Association of Chiefs of Police says internal and external agency communication has a significant impact on programming. Other leading practices note that communication is critical when trying to get employees to participate in health and wellness programs. Program messaging is as important as how often it is communicated, along with the availability and location of the information.

Furthermore, when developing and implementing any program, data collection and ongoing monitoring are key components to achieving the desired results and making improvements. For example, the data collected may include the number of officers accessing a program or the number of officers referred by a supervisor or colleague. However, managers must consider privacy when collecting data.

Managers should also expand or enhance programs based on need. Collecting data helps support requests for additional resources or continued funding. Agencies can address need through an assessment survey aimed at gauging employees' perceptions of its health and wellness programs.

Enhancing and adding resources to the police department's physical therapy and mental health programs would help ensure officers can access necessary — and potentially life-saving — resources, while helping them perform their duties effectively and safely. The success of these programs helps protect officers' wellbeing, saves officers and the city money, and gets officers back to regular duty quicker after injury.

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Therefore, effectively documenting and communicating the programs will not only further the program’s success for existing officers and staff — but it could be a resource to attract more recruits, help alleviate staffing issues for the department, and support funding requests for additional positions.

### 3.1 Recommendation

**Expand physical therapy and mental health services**

The Denver Police Department should partner with the Department of Public Safety to expand the physical therapy program and develop in-house mental health services for police officers such as through budget requests, grant funding, or other means.

**Agency Response** – Agree, Implementation Date – Oct. 1, 2023

See page 58 to read the agency’s responses.

### 3.2 Recommendation

**Document and communicate wellness programs departmentwide**

The Denver Police Department should formally document the department’s employee wellness programs and ensure they are effectively communicated across the department, including to potential recruits.

**Agency Response** – Agree, Implementation Date – April 17, 2017

See page 58 to read the agency’s responses.

See pages 65-68 for the auditor’s addendums.

### 3.3 Recommendation

**Monitor participation in wellness programs**

The Denver Police Department should develop and document processes to monitor participation in its employee wellness programs. Information collected should include but not be limited to the number of officers participating in the program and the number of referrals by a supervisor or colleague. Information collected should be used to evaluate the success of the program and make improvements. Information collected could also be used to support funding requests.

**Agency Response** – Agree, Implementation Date – April 1, 2017

See page 58 to read the agency’s responses.

See pages 65-68 for the auditor’s addendums.
FINDING 4 AND RECOMMENDATION

The Denver Police Department has inconsistent processes to monitor officers’ time worked

The police department monitors how many hours its officers work to ensure they do not exceed the maximum allowed in a given time frame. But we found those processes are inconsistently applied when staff review whether officers work more than 64 hours a week. The department has not documented these processes, which contributes to the inconsistencies we found.

The police department’s operations manual contains several requirements that limit the number of hours an officer can work:

- Officers must not work more than 64 hours in a week, unless the police chief makes an exception.
- Work hours include both on-duty hours and off-duty hours related to secondary employment. Unplanned overtime and appearances in court do not count toward an officers’ total time worked.
- Officers cannot work more than 16 hours in a 24-hour period.
- Officers also cannot split shifts or switch their shifts to accommodate a secondary employment schedule.¹¹³

The department has processes to review timecards on a weekly basis to ensure officers comply with these requirements. But in analyzing officers’ time entries, we found the department was not consistent in how it applied which time codes to exclude from an officer’s total time worked.

We analyzed nearly 2.4 million timekeeping entries across 475,000 weekly timecards for 1,878 officers between Jan. 1, 2017, and Oct. 15, 2022. The department records this data in Telestaff, the department’s timekeeping system. Our analysis identified 19,700 weekly timecards that were potentially noncompliant with the department’s 64-hour limit on hours worked per week.

To analyze these in more detail, we narrowed this pool to a statistical sample of 22 weekly timecards, which we sent to the police department for review.¹¹⁴ Officials then told us about additional codes related to unplanned overtime that are not described in the department’s operations manual. The manual does not


¹¹⁴ See Appendix B for further discussion of how we determined our sample in analyzing the weekly timecards.
explicitly note each code related to unplanned overtime. Therefore, we had to ask department officials.

We also learned of several exceptions that police chiefs had made to the 64-hour rule from January 2017 through mid-October 2022. In line with the chiefs’ authority, some officers were allowed to work up to 72 hours in a week because of staffing needs. The department provided sufficient documentation, so we confirmed those officers were not out of compliance with requirements. However, we did note those instances had codes not documented in either the operations manual or other procedures.

With this information, we found nine of the 22 instances in our sample were true exceptions of officers working more than 64 hours in a week. Therefore, based on our analysis of our statistical sample, we estimate between 4,588 and 11,918 — or between 23% and 60% — of the police department’s weekly timecards from January 2017 through mid-October 2022 did not comply with the operations manual’s requirements for officers’ time worked.

Meanwhile, the department has not documented its process for reviewing timecard violations on a weekly basis. Because of this, staff could inconsistently apply review practices, which could result in officers potentially working more hours than they should.

Federal standards stress the need for managers to document responsibilities and processes performed within an organization. Managers should also communicate policies to personnel to ensure they perform processes consistently.

Having documented procedures helps ensure processes are done consistently and effectively. Specifically having consistent, documented processes to review the hours police officers work would help protect officers’ wellbeing and ensure they are not overworked — which, in turn, would help ensure the safety of the Denver communities they serve.

4.1 RECOMMENDATION

Document and communicate monitoring processes for hours worked

The Denver Police Department should document and communicate its processes in the department’s operations manual, including a formal methodology for reviewing timecards to ensure compliance with work-time requirements. Processes should detail all potential work codes that impact an officer’s compliance with daily and weekly work limits.

AGENCY RESPONSE — AGREE, IMPLEMENTATION DATE — JAN. 23, 2023
SEE PAGE 58 TO READ THE AGENCY’S RESPONSES.
SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS.

AGENCY RESPONSE TO AUDIT RECOMMENDATIONS

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

RECOMMENDATION 1.1
AGENCY RESPONSE: AGREE
AGENCY’S TARGET DATE FOR IMPLEMENTATION: JULY 1, 2023

In 2019, the department transitioned to a one sheet strategic plan that provided an easy to understand and apply format and supported the messaging by requiring new initiatives and funding to be justified utilizing the core strategic values of the department. We agree that condensing the information, action plans, evaluation methods, and reporting expectations is important for transparency and accountability.

The department began a new strategic planning process as soon as Chief Thomas was selected as the 71st Chief of Police in October 2022. We are currently finalizing a more robust strategic plan document that will address the issues identified in the audit to accompany the vision and documents already published by the department.

RECOMMENDATION 1.2
AGENCY RESPONSE: AGREE
AGENCY’S TARGET DATE FOR IMPLEMENTATION: JULY 1, 2023

The concept of Community Policing does not have a universally accepted definition and is instead a framework for ensuring community members are a part of everything we do – I even updated our mission statement when I took over as Chief to enshrine our belief that all who call Denver home are at the center of what we do.

Working with DPD’s Planning, Research, and Support Section, the Community Relations Unit will put together and implement a public facing community policing plan that recognizes the fluid nature of community policing based on the unique needs of our 78 neighborhoods and reduces the risk of our engagement
efforts being siloed.

A new Community Relations director position was created to prioritize the focused and essential efforts towards community policing. We have also hired three civilian community engagement program managers, with offices in the district stations, but reporting to headquarters to bolster community outreach, while also centralizing the mission and overarching priorities of the Chief and the Mayor in the field. Lastly, some of our community engagement staff will be attending a “Professionalizing Community Engagement Training” at the beginning of May to assist in our continual improvement mission.

RECOMMENDATION 1.3
AGENCY RESPONSE: AGREE
AGENCY’S TARGET DATE FOR IMPLEMENTATION: NOV. 3, 2022
SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS

Once Chief Thomas was selected by Mayor Hancock, he went on a listening tour with our officers at all ranks and with community members across Denver’s 78 unique neighborhoods. However, the Denver Police Department has engaged our residents both through our Community Engagement Unit and our district community resource officers. The Department, under Chief Thomas, has also launched the Community Crime Prevention Coalition, a neighborhood version of DPD’s weekly Crime Strategy Briefing; our first meeting was November 3, 2022. At these public meetings, the executive command staff of the department are briefed on crime trends by DPD command officers. This meeting allows the community to witness how we hold each other accountable to ensure that officers are deployed strategically in response to community crime concerns.

Moving forward, we will continue to engage our community members and make our community policing plan publicly available through our published strategic plan.

RECOMMENDATION 1.4
AGENCY RESPONSE: AGREE
AGENCY’S TARGET DATE FOR IMPLEMENTATION: APRIL 24, 2023
SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS

The Denver Police Department is working on a contract with an outside expert to provide community engagement and surveying to better understand the concerns of our community members. This will mirror work completed in other major cities and will give the department data that is timely and actionable. Additionally, the Community Engagement Unit developed a mobile-friendly data collection tool to better track the number of individuals we work with through community events, the topics covered, the concerns raised, and issues related to language accessibility.

Lastly, the department has been engaged in the Place Network Investigations project to take a holistic approach to reducing violence. One of the main tenets of the program is to take a
whole of city approach to increase resources to areas impacted by chronic violence. An independent team of researchers is currently evaluating our efforts and the efforts of like cities around the country.

**RECOMMENDATION 1.5**

**AGENCY RESPONSE:** AGREE

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:** AUG. 1, 2023

One of the first issues Chief Thomas took on when sworn in was to work collaboratively with internal and external stakeholders to improve the overall recruitment process. Our hard work over the last six months has us trending towards a full recruit academy class starting in May.

The Denver Police Department received a $200,000 state grant specifically to build up our recruitment efforts. Using those grant funds, we have hired a marketing firm that will look at our current recruitment strategy and seek out new approaches for reaching important and underserved demographics. We have also broadened our online presence, posting on many popular job boards such as Indeed, Zip Recruiter, government jobs, and many more. We recognize that the length of application process is one of the larger hindrances for applying with DPD, and so we have been working very closely with Civil Service to improve and streamline this process where possible. We have also prioritized a more personal touch in communicating with applicants, making sure they understand next steps and expectations, helping to set the applicants up for success in our vigorous process.

The August 1, 2023 targeted completion date is dependent on our work with the contracted consulting firm.

**RECOMMENDATION 1.6**

**AGENCY RESPONSE:** AGREE

**AGENCY’S TARGET DATE FOR IMPLEMENTATION:** OCT. 26, 2022

As previously noted, the department has already been engaged in communication with internal and external stakeholders, including Civil Service. We are adding recruitment numbers to our transparency dashboards and will work with our contracted marketing partner to continuously look for ways to improve communications around recruitment.

*SEE PAGES 65–68 FOR THE AUDITOR’S ADDENDUMS*
RECOMMENDATION 1.7

AGENCY RESPONSE: AGREE
AGENCY’S TARGET DATE FOR IMPLEMENTATION: DEC. 1, 2022
SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS

The Denver Police Department has always used data to identify staffing needs and used a modified version the last couple of years as we recover from the effects of the pandemic. The department has also been a national leader in identifying positions better suited for professional staff who bring unique skills, education, and experience to the City and County of Denver.

In October of 2022, DPD implemented a new patrol staffing system that was based on the Patrol Staffing methodology that was developed by the Northwestern University School of Police Staff and Command. This model is designed to balance patrol capacity by workload across place and time. The model divides all police calls for service by severity, knowing that more serious calls for service are more resource intensive. Using the model, we created a Patrol Goal Staffing target for each district that was used to strategically allocate patrol resources. Goal staffing is defined as the number of patrol officers needed in any individual districts so that, in aggregate, a patrol officer will have 35% of their shift be non-obligated time, where they can practice proactive policing and community engagement. DPD is currently using this staffing model.

DPD plans to build upon the workload model already established by implementing a response time factor. This will be completed by October of 2023.

RECOMMENDATION 2.1

AGENCY RESPONSE: AGREE
AGENCY’S TARGET DATE FOR IMPLEMENTATION: MAY 1, 2023

The department has already completed an engagement survey and is working on increasing responsiveness to employees at all levels of the department. Two examples include integrating line level feedback during our weekly crime strategy briefing and improving the turnaround for officer commendations.

We also must recognize that officers have been leaving police departments in record numbers all across the country for various reasons, but the attrition has slowed down significantly to just 1.4% YTD.

RECOMMENDATION 2.2

AGENCY RESPONSE: AGREE
AGENCY’S TARGET DATE FOR IMPLEMENTATION: JULY 1, 2023

We currently offer exit interviews for professional staff and recruits who leave the academy but there is a gap in understanding when officers leave the department. We agree with the recommendation and will be working with Safety HR to build a standardized exit interview. Once completed, the exit interview will be routed to our new performance development unit to track trends, highlight what is working, and identify opportunities to improve.
RECOMMENDATION 2.3

AGENCY RESPONSE: AGREE

AGENCY’S TARGET DATE FOR IMPLEMENTATION: MARCH 3, 2023

The department currently has a 1.4% YTD turnover rate and almost 29% of our officers have been on the job for 20+ years. We have implemented a number of retention strategies including launching the Professional Policing and Leadership Institute at the University of Denver, started a Command College, developed a mentoring program, created the professional development unit, and increased our focus on training. Additionally, the new collective bargaining agreement improves longevity pay and provides a formal education stipend – the department has worked with local colleges and universities to improve access.

Lastly, DPD is a national leader when it comes to a comprehensive program to reintegrate officers who have been through a critical incident.

RECOMMENDATION 2.4

AGENCY RESPONSE: AGREE

AGENCY’S TARGET DATE FOR IMPLEMENTATION: JULY 1, 2023

As mentioned previously, we will institute standardized exit interviews and they will be reviewed by the new performance development unit to track trends, highlight what is working, and identify opportunities to improve.

RECOMMENDATION 2.5

AGENCY RESPONSE: AGREE

AGENCY’S TARGET DATE FOR IMPLEMENTATION: MARCH 30, 2023

The Denver Police Department has prioritized the recruitment of diverse groups such as females and minorities. We have created the Women’s Police Academy to give women interested about a career in law enforcement the opportunity to learn about DPD and our many opportunities, as well as speak directly to women from all areas and ranks of the Department and learn what has helped them to thrive in their careers. In 2021, a Women’s Collective was formed to help women come together to identify issues and barriers within the department and seek out solutions. Great strides have been made through this collective. Some of the larger projects include: creating a mentoring program, seeking out new options and funding sources for childcare, and researching temporary part time positions.

The Recruitment Unit has increased our advertising on online platforms, specifically targeting minority candidates through outlets like the HBCU Connect job boards, as well as local media outlets like Telemundo. We have hired AOR, Inc., a marketing firm who help us seek out new approaches for reaching important and underserved demographics such as women and minorities. Our recruiters have increased our presence out at the Tivoli Plaza on the Metro State campus, interacting with college students on a weekly basis. We also spent the first quarter for 2023 meeting with all ten of the Mayor’s Human Rights & Community
Partnerships Commissions to build relationships, answer questions, and listen to ideas and resources for recruiting more diverse officers within Denver.

Additionally, below are our current officer demographics and those of the City & County of Denver:

<table>
<thead>
<tr>
<th></th>
<th>DPD</th>
<th>CCD</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>62.83%</td>
<td>55.00%</td>
</tr>
<tr>
<td>Hispanic or Latino</td>
<td>23.40%</td>
<td>29.00%</td>
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<td>Black or African American</td>
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<tr>
<td>Asian</td>
<td>2.99%</td>
<td>4.10%</td>
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<tr>
<td>Two or More Races</td>
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</tr>
<tr>
<td>American Indian or Alaskan Native</td>
<td>0.86%</td>
<td>1.80%</td>
</tr>
<tr>
<td>Decline to identify</td>
<td>0.40%</td>
<td></td>
</tr>
<tr>
<td>Native Hawaiian or Pacific Islander</td>
<td>0.07%</td>
<td>0.20%.</td>
</tr>
</tbody>
</table>

**RECOMMENDATION 3.1**

**AGENCY RESPONSE:**

AGREE

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

OCT. 1, 2023

The Denver Police Department and the Department of Safety have created a wellness and resiliency program, inclusive of mental health care and physical therapy, that are a national model; we were one of the first to offer in-house physical therapy. We have long utilized general funds and grant dollars to maximize operational capacity and we will continue to work with the Department of Safety to secure funding for our innovative programs. The targeted completion date of October 01, 2023 coincides with the Department of Safety budget presentations to City Council.

The Resiliency and Wellness Program encourages a whole-body approach to health, fitness, and wellness. Multidimensional by design - so as to provide education, awareness, training, and support - the program encourages a healthy lifestyle and habits, with a focus on enhancing overall resiliency and the effective management of stress.

Lastly, as previously noted, DPD is a national leader when it comes to a comprehensive program to reintegrate officers who have been through a critical incident. This program gives our officers the opportunity to have a holistic and unique approach to their overall health and places them in a position to have productive careers post-critical incident.
RECOMMENDATION 3.2

AGENCY RESPONSE: AGREE

AGENCY’S TARGET DATE FOR IMPLEMENTATION: APRIL 17, 2017

SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS

When recruits enter the police academy one of the first lectures they receive is on the wellness and resiliency program and the importance of overall health and wellbeing. Additionally, beginning in April of 2017 the department has utilized our intranet to create a unique page dedicated to our offerings. The department is a national leader in wellness and resiliency and our staff complete multiple invited national speaking engagement every year. Lastly, chaplains are available at the district level and across the department for officers and professional staff who would prefer a faith-based approach, and we have nearly 50 trained employees who are part of a Peer Support Team.

RECOMMENDATION 3.3

AGENCY RESPONSE: AGREE

AGENCY’S TARGET DATE FOR IMPLEMENTATION: APRIL 1, 2017

SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS

In addition to the City and County of Denver’s employee wellness program, the DPD offers the Wellness Rewards Program. Using a point system, officers track healthy behaviors and accumulate points during the year, resulting in earned compensation time. There is a detailed guide for this program that is made available to staff through the department’s intranet. As an agency, we have documented officer utilization of our programs dating back 20 years; the April 2017 date reflects our expansion of services and the documentation under the current rewards program. We would also like to note that while we track certain programs in aggregate, we can’t track some usage in detail because of privacy issues.

Lastly, DPD is in the process of building an automated tool that will screen officers for compassion fatigue, based on research developed by the FBI. This would allow DPD to identify officers who may need wellness resources based on the volume and type of calls they are exposed to. This would make officer wellness a regular business practice allowing officers to receive information and services far earlier than they do now.

RECOMMENDATION 4.1

AGENCY RESPONSE: AGREE

AGENCY’S TARGET DATE FOR IMPLEMENTATION: JAN. 23, 2023

SEE PAGES 65-68 FOR THE AUDITOR’S ADDENDUMS

The individual cases identified by the Auditor’s office during the audit process regarding hours worked were examined and no compliance issues were identified. Additionally, the department updated the relevant Operations Manual policy related to total hours worked on January 23, 2023, and the secondary employment coordinator already completes weekly audits. Lastly, we proactively monitor work codes to ensure they are relevant and meet the needs of the department.
AUDITOR’S ADDENDUMS

We are pleased the Denver Police Department agreed to implement all 16 of our recommendations. However, aspects of the department’s responses merit further clarification based on our audit findings.

Specifically, police department officials claim to have already implemented most of our recommendations — even as they acknowledge in several cases their efforts are ongoing or that they have intentions for future improvements.

As we do with each audit, we will officially assess the department’s implementation efforts when we follow up on the audit recommendations at a later time. In the interim, we encourage the police department to take the additional steps necessary to adequately implement each of the recommendations it has agreed to — which would serve to benefit the department, its officers, and the Denver community at large.

Auditor’s Addendum to Agency Response for Recommendation 1.3

The police department’s written response discusses several activities it does within the community. But as discussed in the report, the point of Recommendation 1.3 is to ensure the department “effectively communicate(s)” the comprehensive plan developed and implemented in response to Recommendation 1.2. This effective communication should be both internal to officers and staff and to external stakeholders, including community members.

Police officials claim they already implemented this recommendation on Nov. 3, 2022. Although we will not officially verify this until we complete our follow-up process, it is not possible for them to have communicated any plan — internally or externally — by that date. As we discuss on pages 15 and 16 of the report, the department does not have a documented, comprehensive strategy to support its community policing efforts. Therefore, there is no plan that could have been communicated last fall.

In addition, we discuss on page 16:

- How in January 2023 the department began researching ways residents and community members could provide feedback about police officer interactions.
- How the department’s efforts are siloed and not shared among units involved in addressing community-related concerns.

Furthermore, on pages 16 and 17, we cite federal guidance for law enforcement — which stresses the importance of a comprehensive community policing plan to implement an agency’s mission. Page 21 further explains how a plan should broadly describe the agency’s actions “to ensure every officer and staff member embraces the mission of community policing.” The plan should:

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• Describe the department’s vision and goals.
• Describe goals and responsibilities for everyone in the department.
• List key activities and milestones.
• Define standards and performance metrics for success.\footnote{118}

Establishing and communicating such a plan would help ensure Denver’s police officers understand their collective role in achieving the department’s community policing mission and ensure those efforts are consistently applied across units. Publishing the plan would also help create transparency of the department’s efforts to the communities it serves and help solicit feedback on those efforts.

**Auditor’s Addendum to Agency Response for Recommendation 1.4**

The department’s response describes several ways it intends to collect information to better understand the concerns of Denver community members in ways that are timely and actionable. Officials said they implemented this recommendation on April 24, 2023. We will not verify this until we follow up on the audit recommendations at a later time.

In the interim, to ensure transparency and ensure police officials understand the intent of this recommendation, we offer additional context:

Specifically, page 21 of the report discusses policing best practices for developing a comprehensive community policing plan from both the U.S. Department of Justice’s Office of Community Oriented Policing Services and the National Policing Institute.\footnote{119} One of the National Policing Institute’s steps to promote best practices in policing includes defining standards and performance metrics for success to determine whether objectives are met and whether the organization’s mission is fulfilled.

Therefore, along with the data collection efforts the department describes in its response, police officials should also ensure they develop ways to measure the effectiveness and success of community policing efforts to help ensure officers meet the department’s mission.

**Auditor’s Addendum to Agency Response for Recommendation 1.6**

While the department claims this recommendation was implemented on Oct. 26, 2022, the written response from police officials acknowledges efforts related to this recommendation are still in progress.

Namely, the department says it is “adding recruitment numbers to our transparency dashboards and will work with our contracted marketing partner” to improve communications for recruitment.

Furthermore, other evidence we received during the audit — and after the department’s reported implementation date — show implementation efforts are not yet complete.

As we were still conducting fieldwork for this audit, the department provided a draft recruiting plan in November 2022. Additionally, we had not received the department’s finalized recruiting plan as of January 2023, as noted on page 24 of the report.

\footnote{118 U.S. Department of Justice, Office of Community Oriented Policing Services, COPS-W0875, “Law Enforcement Best Practices: Lessons Learned from the Field”; IntegrAssure Inc. and the National Policing Institute.}
\footnote{119 U.S. Department of Justice, Office of Community Oriented Policing Services, COPS-W0875, “Law Enforcement Best Practices: Lessons Learned from the Field”; IntegrAssure Inc. and the National Policing Institute.}
**Auditor’s Addendum to Agency Response for Recommendation 1.7**

The department claims this recommendation was implemented on Dec. 1, 2022. Officials’ written response discusses how the department developed a new patrol staffing system in October 2022 but it goes on to say the department continues to build on this new model — and those efforts will not be complete until October 2023. Therefore, by police officials’ own acknowledgment, this recommendation has not yet been implemented.

In addition, police department staff who worked on the new staffing model told us in November 2022 that the October 2022 version was the most recent update at that time. They said it would be further refined in 2023. Therefore, the new staffing model has not yet been finalized, implemented, and communicated. Furthermore, as noted on page 29 of the report, the department was still using its old staffing model as of December 2022.

We developed this recommendation to support and encourage the department to finalize, implement, and communicate its staffing analysis. We encourage the police department to take the additional steps necessary for adequate implementation.

**Auditor’s Addendum to Agency Response for Recommendation 3.2**

The department claims it implemented this recommendation in April 2017 — about five years before this audit began.

Officials’ written response mentions how the department provides lectures at the police academy and has used its intranet to communicate wellness and resiliency programs since 2017. It also mentions how the department is a national leader in its wellness offerings.

However, neither of those points mean the department has “effectively” communicated its programs, which is the purpose of Recommendation 3.2.

As noted on page 54 of the report, responses to a wellness survey provided by the Department of Public Safety found many law enforcement officers were unaware of the wellness programs available to them. We also discussed that while the Denver Police Department’s operations manual discusses some wellness programs, the department has no comprehensive document that includes descriptions and benefits of all wellness programs available.

Finally, as we note on page 55, having such a comprehensive document and effectively communicating it could not only help existing officers and staff, but it could also be used as a resource to attract recruits.

**Auditor’s Addendum to Agency Response for Recommendation 3.3**

As with Recommendation 3.2, the department claims it implemented this recommendation in April 2017 — about five years before this audit began. At the same time, officials’ written response discusses how the Denver Police Department is still “in the process” of building an additional tool to help identify officers who may need wellness resources based on their workloads. Therefore, by their own acknowledgment, officials have not yet implemented this recommendation and their work is ongoing.

Officials’ written response mentions the department’s wellness rewards program and a detailed guide. We received this guide, which does detail the program and its time-off rewards. Examples of activities that contribute to rewards include an annual mental health check, dental exam, annual eye exam, gym attendance, flu shot, and participation in a weight loss program. This program is similar to the one the city offers to career service employees.
But the police department’s program does not track participation in other programs offered — such as the peer support, resiliency, physical therapy, or reintegration programs. These programs are detailed on pages 7 and 8 of the report.

The department’s response says officials cannot track some usage details because of privacy issues. But we are not asking the department to track personally identifiable information of the officers who participate. Rather, the recommendation’s purpose is for the department to develop a way to monitor levels of participation in its programs so police officials can evaluate the success and effectiveness of its wellness programs and make improvements as needed.

As noted on page 54 of the report, leading practices stress that data collection and ongoing monitoring are key components to achieving desired results and making improvements. Leading practices also advise considering privacy when collecting data, which should address the police department’s concern.

Department leaders would benefit from using this participation data, particularly when they must ask city leaders for more resources or continued funding.

Auditor’s Addendum to Agency Response for Recommendation 4.1

The department claims to have implemented this recommendation on Jan. 23, 2023, when it updated its operations manual and the policy for total hours worked.

Officials’ written response says no compliance issues were identified in our testing of hours worked. We acknowledge this on page 57 of the report, where we discuss how the department provided documentation to confirm officers’ compliance with the hours worked policy.

Nevertheless, the reason for this recommendation stems from the inconsistencies in the information the department provided for our analysis. For example, as discussed on page 56, we found the department used time codes that were not documented in the operations manual. Additionally, neither the review process nor all time codes the department uses to determine whether an officer is compliant with department policies were documented.

Therefore, the risk of officers’ exceeding the maximum number of hours worked remains — and working more than the maximum number of hours can negatively impact officers’ wellbeing.

No matter the number of hours or whether the police chief grants an exception, the department should document its review process to ensure compliance with its own policy. As we recommended, this documentation should include all time codes used to determine what hours apply.

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OBJECTIVE

To determine whether the Denver Police Department:

- Has effectively designed, implemented, and evaluated its recruiting practices to achieve its mission, goals, and objectives.
- Is effectively monitoring turnover and designing retention activities accordingly.
- Is adequately using data to assess its resources to ensure operations are conducted effectively, particularly as it relates to current staffing levels.

SCOPE

The audit assessed the operational effectiveness of the Denver Police Department by reviewing and analyzing the department’s policies, procedures, and strategic documents, as well as surveys and officer data. We reviewed the period from Jan. 1, 2017, through Jan. 18, 2023.

METHODOLOGY

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

- Interviewing personnel from various city agencies:
  - The Department of Public Safety, including the Denver Police Department.
  - The Department of Finance, including the Risk Management and Workers’ Compensation Division.
  - The Civil Service Commission.
- Observing:
  - The Risk Management and Workers’ Compensation Division’s risk management dashboard of citywide workers’ compensation information.
  - The Denver Police Department’s human resources dashboard about the number of uniformed officers.
- Surveying uniformed officers in the Denver Police Department, as detailed in Appendix C.
• Comparing:
  ▪ Staffing levels at selected other cities’ police departments in Colorado and across the United States:
    • Aurora, Colorado.
    • Colorado Springs, Colorado.
    • Fort Collins, Colorado.
    • Albuquerque, New Mexico.
    • El Paso, Texas.
    • Miami.
    • Oklahoma City.
  ▪ Salaries for police officers at selected other local police departments in Colorado — specifically for those in Colorado Springs, Aurora, Lakewood, Thornton, Arvada, Castle Rock, Commerce City, Parker, Englewood, and Wheatridge.

• Reviewing:
  ▪ Various reports and guidance published by the Office of Community Oriented Policing Services within the U.S. Department of Justice, namely:
    • A 2014 report on integrating civilian staff into police agencies.
    • A 2014 report on community policing.
    • A 2016 assessment of the San Francisco Police Department.
    • A 2019 report on law enforcement best practices.
    • A 2019 report to Congress on the Law Enforcement Mental Health and Wellness Act.
  ▪ Guidance published by the International Association of Chiefs of Police, namely:
    • A 2004 study on patrol staffing and deployment.
    • A 2007 report on best practices for recruitment, retention, and turnover.
    • A 2018 report on developing fitness programs.
    • A 2021 report on officer health and wellness assessment tools and action planning.
  ▪ Wellness Workday’s October 2018 article on best practices for wellness program communications.
  ▪ A Police Chief Magazine article from May 2021 on law enforcement suicide data.
  ▪ The collective bargaining agreement between the City and County of Denver and the Denver Police Protective Association for 2021-2022.
  ▪ The Denver Police Department’s operations manual and its community outreach documents.
  ▪ The City of Portland, Oregon’s October 2019 audit report on police overtime.
  ▪ A white paper on police department staffing from the International City/County Management Association’s Center for Public Safety Management.
  ▪ National policing best practices from IntegrAssure Inc. and the National Policing Institute.
  ▪ The San Francisco Police Department’s March 2022 staffing analysis.
  ▪ The Baltimore Police Department’s 2022 staffing plan update.
  ▪ The Aurora, Colorado, Police Department’s risk survey.
• Analyzing:
  ▪ Trends in reports of violent and nonviolent crime in Denver from 2017 through 2022 compared to staffing levels for Denver’s police force, as discussed in Appendix A.
  ▪ Information from the Denver Police Department's timekeeping system, Telestaff, from 2017 through 2022, as discussed in Appendix B.
  ▪ Information on employee separations from the Denver Police Department in the city’s system of record, Workday, as of Oct. 27, 2022.
  ▪ The Department of Public Safety's 2022 wellness survey results for the Denver Police Department.
  ▪ Blue H.E.L.P.'s information on law enforcement suicide data for 2017 through 2022.
  ▪ The City and County of Denver’s employee engagement surveys for 2017, 2019, and 2022.
  ▪ The Department of Public Safety's exit surveys from Workday for 2021 and 2022 and its budget request for 2023 related to People Element.
  ▪ Data and documentation from the Denver Police Department, namely its:
    ▪ Strategic framework for 2022 through 2024.
    ▪ Goals, objectives, and budgeting documents for the recruiting unit.
    ▪ Staffing analyses.
    ▪ Computer-aided dispatch data from 2017 through 2022.
    ▪ New position and separation reports for 2017 through 2022.
    ▪ Grant applications for the state's Crime Prevention Grant Program.
APPENDICES

Appendix A – Trends in Denver’s reported crime: 2017-2022

We compared trends for violent and nonviolent crime reported in Denver from 2017 through 2022 with staffing levels for Denver’s police officers during that same time. The information provides perspective on Denver’s increasing crime trends and the crime rate per officer.

We obtained data on crime reported to the Denver Police Department and categorized the crimes by whether they were “violent” or “nonviolent.” The federal Uniform Crime Reporting Program defines “violent” crimes as crimes against other people, including murder, rape, and assault. “Nonviolent” crimes are crimes against property, such as robbery, bribery, and burglary. Consistent with that, we defined violent crimes as those where the victim was a person, and we grouped all other types of crime as nonviolent. From 2017 through 2022, the data identified 386,526 offenses across 361,121 unique cases.

Meanwhile, we also obtained data from the department about the number of officers employed for each year. In our analysis, we included only the 765 officers with job profiles related to police officer grades 1 through 4, police recruits, and police recruits from other agencies — as these positions are the ones most likely to first respond to calls for service. We did not include 1,067 supervisory uniformed officers or department administrative staff.

As shown in Figure 18 on the next page:

- The crime rate per police officer has increased about 31% since 2020.
- Nonviolent crime accounted for the overwhelming majority of criminal offenses reported in Denver since 2017. On average, nonviolent crime accounted for 89% of reported crime, while violent crime accounted for about 11%.
- Other than a slight decline in 2019, reported crime in Denver has been rising since at least 2017. The most significant rise was among nonviolent crime between 2020 and 2021, when reports increased about 13% year over year.
- Our analysis showed 2019 had the highest proportion of violent crime — which was 12% of all reported crime that year. By comparison, 2021 had the lowest proportion of violent crime, representing 10% of reported crime that year.
- Overall, 2022 had the most crime of any year in this six-year period — with 76,432 crimes reported. Meanwhile, 2017 had the lowest overall with 56,713 crimes reported.

Geographically, police District 6 — which encompasses downtown Denver, including Civic Center Park, the 16th Street Mall, and Cheesman Park — had the highest number of overall offenses from 2017 through 2022. During those six years, 88,339 crimes were reported in District 6, or about 22.9% of all reported crime citywide in that time.

Denver International Airport had the lowest overall number of offenses with only 788, or 1.6% of all reported crime in the city from 2017 through 2022.

At the neighborhood level, Five Points north of downtown had the highest reported crime with 23,707 offenses from 2017 through 2022 — or 6.1% of all reported crime during that time frame. The Wellshire neighborhood in southeast Denver had the lowest overall reported crime, with only 410 offenses — or 0.1% of all reported crime during those six years.

**FIGURE 18. Rate of reported crime, per Denver police officer**

*Note: For this graphic, a “police officer” is defined as those with job profiles for police officer grades 1 through 4, police recruits, and police recruit laterals 1 and 2. It does not include supervisory uniformed officers or department administrative staff.*

*Source: Auditor’s Office analysis of crime and employment data provided by the Denver Police Department.*
Appendix B – Analyzing police officers’ time worked

We sought to assess how compliant Denver police officers were with working no more than 64 hours per week, as required by the department’s operations manual. To perform this analysis:

1. We obtained a report of all timekeeping entries for the Denver Police Department from Jan. 1, 2017, through Oct. 15, 2022. That report from Telestaff — the department’s timekeeping system — included 2,581,568 entries.

2. We filtered the data to remove:
   - 1,426 entries that had no badge identification number.
   - 50,905 entries associated with police officers having either “commander” or “chief” in their job title, because these positions are exempt from the hour limits set in the manual.
   - 172,918 entries associated with work codes that explicitly referenced “court time” or “continuous duty.”

   According to the operations manual, shifts related to an officer’s appearance in court and assignments requiring unplanned overtime hours do not count against requirements for time worked.122

   This left us with 2,356,319 timekeeping entries for analysis across 474,924 weekly timecards for 1,878 officers.

3. Among that data, we grouped the number of hours worked per week for each officer. We flagged all instances in which the total hours worked in a week exceeded 64 hours. Of the 474,924 timecards, we identified 19,709 as potentially exceeding that 64-hour maximum.

4. We next sought to define a statistical sample for further analysis. We used a discovery sampling approach so we could have confidence that the number of issues we identified was below a specified percentage. We used the EZ-Quant statistical sampling tool to calculate our random sample based on:
   - A population size of 19,709 weekly timecards.
   - A critical error rate of 10%.
   - A confidence level of 90%.

   This resulted in a sample size of 22 weekly timecards.

5. We asked police department staff for documentation related to each of the 22 timecards to assess whether the timecards complied with the police operations manual.
   - In the nine cases where a police officer’s hours appeared to have exceeded the 64-hour limit, we received evidence showing the police chief approved an exemption, which is within the chief’s authority under the operations manual.
   - We learned of around 40 additional work codes that relate to an officer’s unplanned overtime, which did not explicitly reference “continuous duty” in the work code’s description.
   - We learned three time sheets contained inflated hours because officers may use work codes to indicate both the amount of time worked and the location of their assignment. Because these processes were not detailed in the operation’s manual, we flagged these weekly timecards as exceeding the 64-hour limit.

Finding 4 discusses our additional findings and conclusions related to the department’s lack of documentation and inconsistent monitoring for compliance with the 64-hour work-time limit.

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Appendix C – Surveying uniformed officers

We took the following steps to survey a population of uniformed officers in the Denver Police Department:

1. We met with the police auditor from the City of Aurora, Colorado, to discuss how they developed the Aurora Police Department’s risk survey. After that conversation, that auditor provided a draft copy of their survey to us. This draft example served as the basis for the survey we sent to the Denver Police Department.

2. We developed a draft copy of our survey using Survey Monkey with the goal of collecting information from non-leadership positions most impacted by department policy.

3. In identifying the intended audience for the survey, we included only officers from the commander level down. This excluded those with leadership positions like division chiefs, the deputy chief, and the police chief, as these positions are most likely to make decisions impacting retention.

4. In an effort to encourage survey responses, we attended briefings at the six district stations and gave a short introductory presentation about the survey and about the Auditor’s Office.

5. We then sent a survey link to 1,406 officers on Oct. 31, 2022. They had until Nov. 11, 2022, to respond. We sent several reminder emails to officers during this time.

6. Of the 1,406 surveys we sent, we received 289 responses — for a response rate of 21%.

Results of our analysis of the responses supported our conclusions in Finding 2.
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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