Auditor O’Brien and members of the Audit Committee:

The outcome of any well-intentioned audit is to inform the administration leadership in ways that make future agency operations more efficient and productive for our residents. For the most part my administration has welcomed the auditing process, even when negative headlines were generated, because this process can lead to improvements in agency operations. I have only rarely been openly critical of audits undertaken by the Office of the Auditor, but I am compelled to do so in this instance of the “City Equity Program and Practices” audit.

While there are some positive recommendations for future operations of the Mayor’s Office of Social Equity and Innovation (OSEI) and overall structure for the city’s equity programs and practices in this report, the overall value is marred by an incomplete description of the history and evolution of the city’s equity work, glaring omissions of equity work-in-action, and other errors suggesting that this audit was undertaken in haste, and without a serious appreciation for the challenges of establishing a new office in the midst of an unprecedented global pandemic.

I must also question the necessity at this juncture for an audit of an office still in its relative infancy. Having only been formally established by Executive Order in June 2020 – during the early months of the pandemic when many city operations were hindered – I believe this audit to be premature. Performing this audit at a later time, when the office is more established and its work more fully integrated into city departments, would have provided a much more beneficial review of the impacts of its operations and where processes could be improved. The bulk of the report’s recommendations can be summarized as criticism around a lack of strategic planning, metrics for success, clearer definitions of roles and responsibilities, staff empowerment, better internal communication, and more precise accounting procedures. These are recommendations OSEI accepts and can improve the operations of the agency. Indeed, they are actions the office was planning to implement or in the process of implementing regardless of this audit. In consultation with OSEI’s Executive Director, Dr. Aisha Rousseau, and her team, we nonetheless appreciate these recommendations and, going forward, the agency will be better prepared to meet the expectations of our residents.

The history of Denver’s equity initiative predates my Executive Order establishing OSEI. While the audit report gives a cursory history of equity initiatives nationally, the absence of Denver’s national leadership in this space dating back to 2017 and efforts undertaken by my office, Councilwoman Debbie Ortega and the Agency for Human Rights and Community Partnerships (HRCP) to establish an equity framework for city projects and operations is a glaring omission. No mention is made of the community dialogue we initiated with noted author Claudia Rankine. No mention is made of the cross-agency training for Executive Directors we undertook with Rev. Dr. Bryant Marks, Sr. No mention is made of the community workshops that were organized on equity throughout 2018 and into 2019. This history is relevant context as it underscores the home-grown efforts initiated to develop an equity-based policy agenda.
Denver was not mimicking other cities, rather we were shaping best practices and others were looking to us for guidance.

It is a disservice to not account for an accurate and full understanding of the work undertaken in Denver between 2017-2019. In this regard, the report’s timeline for the organizational effort supporting equity is flawed by omission. What is galling, however, and why I believe this audit report is more detrimental than supportive to the cause of equity in our city, is while the audit report’s authors were closely examining the trees, they neglected to see the forest.

The forest, in this case, was an unprecedented global pandemic that caused the shutdown of many city offices, the suspension of normal operations and a clarion call to every city employee to rethink their work to help save the city. One can read this audit report and come away with the impression that nothing of consequence was happening in Denver in 2020-2021.

Had the Auditor’s Office considered a thorough review of the city’s equity efforts and OSEI’s work in 2020-21, there would have been an effort to look at the more than 207 days and 130 daily operational plans OSEI was responsible for in supporting during the city’s response to the COVID-19 pandemic, the protests in response to the death of George Floyd, and elections that took place in the wake of national attempts to undermine them. To my knowledge no effort was made to look at these situations and documents. Had such an effort been made, the audit team would have learned that equity was an integral part of the emergency response planning process – capably led by three women, Erin Brown, Kim Desmond and Dr. Aisha Rousseau, who served consecutively as chief equity officers during the 2020-22 timeframe. In fact, other emergency management agencies in cities across the country looked to Denver regarding this work so they could duplicate it. Had a serious effort been undertaken to understand the changing nature of the equity mission as a consequence of the pandemic, at least a portion of this report would have been taken up with a review of the equity-in-action work led by OSEI and contributing to the recovery of our city.

Nowhere mentioned in this report, as a matter of fact, is any review of critical equity work supporting small business that were shut down, emergency food deliveries, COVID testing or COVID vaccination planning and operations. This omission demonstrates a lack of understanding by the audit report’s authors about the critical role OSEI played in Denver’s emergency operations for the period covered by the report (2020-21).

During the worst public health crisis in modern memory, it would have been dereliction of duty for any city agency to prioritize strategic or communications plans over the mission of Denver city government to put every shoulder to the wheel to support our residents during those difficult times while absorbing emergency budget cuts and staff emergency operations on a near hourly cadence for the better part of two years. A fair and thorough audit of OSEI’s work in 2020-21 would have taken account of the following:

- Standing up emergency testing centers
- Creating equitable funding support for small businesses
- Expanding public health education in underserved communities
- Staffing equitable food and water distribution
- Staffing vaccination sites
- Launching Colorado’s first in-home vaccination plan for individuals required to remain in their homes for safety reasons
• Mitigating widespread outbreaks at residential centers for older adults and people with disabilities
• Establishing a universal request and distribution system for personal protective equipment (PPE)
• Standing up emergency shelters
• Ensuring effective communication to community members about COVID-related resources in 12 languages, including American Sign Language

While we certainly appreciate the recommendations in this audit report, the overall picture it paints of the city’s equity work following the establishment of OSEI in June 2020 lacks critical context and is, therefore, flawed. Most concerning is that it misperceives the mission of equity during a public health crisis and subsequent events and disrespects the work of city employees who were often called upon to set aside their normal work to take on historic challenges to save lives and livelihoods during an unprecedented time.

Respectfully,

Michael B. Hancock
Mayor