



04/04/2023

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

Dear Mr. O'Brien,

The Office of the Auditor has conducted a performance audit of Encampment Response.

This memorandum provides a written response for each reportable condition noted in the Auditor's Report final draft that was sent to us on March 30, 2023. This response complies with Section 20-276 (c) of the Denver Revised Municipal Code (D.R.M.C.).

### **AUDIT FINDING 1**

The city lacks sufficient procedures and reliable data to ensure people experiencing homelessness who live in unauthorized encampments are treated equitably and lawfully.

<b>RECOMMENDATION 1.1</b> <b>Establish and document roles and responsibilities</b> The Department of Transportation & Infrastructure should establish and document roles and responsibilities — either in a contract or elsewhere — for the department and its contractor to evaluate and dispose of property collected and stored in the city's storage facility.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	06/30/2023	Joey Hernandez 720-319-6534

### **Narrative for Recommendation 1.1**

The Department of Transportation and Infrastructure will formally document existing policies and procedures utilized for the evaluation and disposal of property not claimed after 60 days and ensure continued compliance with the Lyall Settlement.

<b>RECOMMENDATION 1.2</b> <b>Develop and document policies and procedures for property storage compliance</b> The Department of Transportation & Infrastructure should work with its contractor to develop policies and procedures for ensuring compliance with the Lyall Settlement regarding property storage and disposal. Policies and procedures should include how
--

<p>and where the department and its contractor will consistently document collection and disposal dates for property as well as when and how property will be disposed of. Transportation &amp; Infrastructure should document a City Attorney's Office review of the policies and procedures to ensure they comply with legal requirements.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>06/30/2023</p>	<p>Joey Hernandez 720-319-6534</p>

**Narrative for Recommendation 1.2**

The Department of Transportation and Infrastructure will formally document policies and procedures utilized for property not claimed after 60 days and ensure continued compliance with the Lyall Settlement.

<p><b>RECOMMENDATION 1.3</b>  <b>Develop and document policies and procedures for property storage data</b>          The Department of Transportation &amp; Infrastructure should work with its contractor to develop policies and procedures for inputting, tracking, and monitoring property storage data. Transportation &amp; Infrastructure should document a City Attorney Office review of the policies and procedures to ensure they comply with legal requirements.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>06/30/2023</p>	<p>Joey Hernandez 720-319-6534</p>

**Narrative for Recommendation 1.3**

The Department of Transportation and Infrastructure will formally document policies and procedures utilized for property storage and ensure continued compliance with the Lyall Settlement.

<p><b>RECOMMENDATION 1.4</b>  <b>Monitor property storage data</b>          The Department of Transportation &amp; Infrastructure should periodically monitor property storage data to ensure it supports compliance with legal requirements. It should document these periodic reviews and provide feedback to its contractor, as necessary.</p>		
---	--	--

<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	06/30/2023	Joey Hernandez 720-319-6534

**Narrative for Recommendation 1.4**

The Department of Transportation and Infrastructure will formally document policies and procedures utilized for property storage and ensure continued compliance with the Lyall Settlement. The review and feedback process will be formalized in those policies and procedures.

<p><b>RECOMMENDATION 1.5</b>  <b>Develop and document policies and procedures for providing notice at regular cleanups</b>  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop policies and procedures to provide the required 48 hours’ notice for unattended personal property found at its regular citywide cleanups in compliance with the Lyall Settlement. It should also document a City Attorney’s Office review of the policies and procedures to ensure they comply with legal requirements.</p>		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	06/30/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 1.5**

The Unauthorized Encampment Response Program will formally document existing policies and procedures pertaining to 48-hour postings. Per the Lyall Settlement routinely referenced in the Auditor’s report, unattended items that pose a public health risk may be disposed of immediately. 48-hour postings are not required in permanently posted regular clean up area and large-scale cleanup posted areas.

<p><b>RECOMMENDATION 1.6</b>  <b>Develop and document policies and procedures for employee training</b>  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with all agencies responsible for homeless encampment cleanup and response to develop and document policies and procedures for ensuring staff complete required trainings, including those required by the Lyall Settlement.</p>		
---	--	--

<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	07/31/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 1.6**

All citywide required trainings and their completion status for employees is tracked within Workday. This includes the Lyall Settlement required training. The city has made the Informed, Compassionate, and Positive Interactions with People Experiencing Homelessness course required training for all city employees. City agencies also organize supplemental training for all staff included in encampment response.

The Unauthorized Encampment Response Program, agency supervisors, and agency managers with staff directly involved in encampment response will utilize existing completion tracking in Workday to confirm completion of required trainings and formalize the tracking of supplemental trainings attended by staff.

<b>RECOMMENDATION 1.7</b>		
<b>Monitor compliance with employee training</b>		
The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with all agencies responsible for homeless encampment cleanup and response to develop and document a process to monitor compliance with employee training requirements, including those required by the Lyall Settlement.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	07/31/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 1.7**

This correlates directly to recommendation 1.6.

The Unauthorized Encampment Response Program, agency supervisors, and agency managers with staff directly involved in encampment response will utilize existing completion tracking in Workday to confirm completion of required trainings and formalize the tracking of supplemental trainings attended by staff.

<b>RECOMMENDATION 1.8</b>		
<b>Follow the city’s records retention policy</b>		
The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with city agencies responsible for providing and		

monitoring training to ensure compliance with the city’s records retention policy related to preserving training documentation.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	07/31/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 1.8**

The city will continue to follow the records retention policy and ensure compliant documentation of training documentation.

<b>RECOMMENDATION 1.9</b> <b>Update city webpage</b> The City Attorney’s Office should work with responsible agencies to ensure the city’s website contains, at a minimum, all information required by the Lyall Settlement and that the information is accurate so people experiencing homeless can be easily informed of where and how to retrieve their personal belongings.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	04/03/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 1.9**

A miscommunication led to changing the address on the storage website to 2314 Broadway (Saint Francis Offsite Storage) in early June of 2022. The website was corrected to the accurate address, 1449 Galapago, on August 26<sup>th</sup>, 2022. The incorrect address was only displayed from June 2022 to August 26<sup>th</sup>, 2022.

The directions for individuals to contact 311 for information on stored property was added to the website on 04/03/2023.

<b>RECOMMENDATION 1.10</b> <b>Continue developing centralized data tracking</b> The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should continue developing a centralized database for the encampment response teams to help provide consistent and centralized data tracking at encampment sites.		
---	--	--

<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	12/31/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 1.10**

The city continues the development of its centralized database and program management tool NAVapp. This application will allow all agencies to track their efforts in a uniform and consistent manner.

<b>RECOMMENDATION 1.11</b>		
<b>Identify consistent method for location tracking</b>		
The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with agencies to identify and adopt a consistent method for tracking location data, such as latitude and longitude coordinates.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	12/31/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 1.11**

The database and program management tool NAVapp will convert all location information into latitude and longitude coordinates.

<b>RECOMMENDATION 1.12</b>		
<b>Develop and document policies and procedures for outreach data</b>		
The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop policies and procedures for data input, tracking, and monitoring for outreach data. The policies should include what data should be tracked, such as location, services provided, and demographic information.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	12/31/2023	Matthew Wilmes/Lana Dalton 720-865-9060/720-913-1845

**Narrative for Recommendation 1.12**

The encampment audit considers traditional street outreach teams and hybrid outreach teams (where the teams enforce laws as well as outreach) to be in the same category when it comes to data collection and monitoring.

However, these types of outreach (traditional street outreach vs. hybrid outreach) face an important difference with regard to data collection and monitoring. Traditional street outreach teams in Denver, in alignment with best practices as indicated in the audit, utilize the Colorado Homeless Management Information System (COHMIS) to do this work. Data collection policies and procedures for COHMIS are established at the state-level, and Metro Denver Homeless Initiative (MDHI), which implements COHMIS for the 7-County Metro Denver region, determines who in the metro Denver area can obtain direct access to HMIS in alignment with Statewide COHMIS Policies and Procedures they are required to follow.

Those policies and procedures prohibit law enforcement personnel from accessing COHMIS (see section 9.10). Thus, developing and document policies and procedures for outreach team data as defined in the audit is not feasible without all teams being in the same software, which is not currently allowable.

HOST will continue to use our policies and procedures that are already in place to monitor the existing contracts that we have and follow the HMIS policies and procedures that are in place with our COC for data input, tracking and monitoring of HOST’s internal outreach teams.

The Unauthorized Encampment Response Program will work with DPD’s Homeless Outreach Team and the Street Enforcement Team to identify the data that should be tracked and how that data will be monitored relating to their outreach efforts. This will occur alongside the development of NAVapp.

<b>RECOMMENDATION 1.13</b>		
<b>Monitor outreach data</b>		
The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should periodically monitor outreach data to ensure accuracy and identify trends. It should document these periodic reviews and revise policies and procedures as necessary.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	12/31/2023	Matthew Wilmes/Lana Dalton 720-865-9060/720-913-1845

**Narrative for Recommendation 1.13**

Please reference response to recommendation 1.12

<p><b>RECOMMENDATION 1.14</b>  <b>Develop and document policies and procedures for cleanup and assessments data</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop policies and procedures for data input, tracking, and monitoring of its cleanup and assessments data.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 1.14**

Data pertaining to large encumbrance removals, cleanup efforts, and assessments is currently tracked and maintained by the Department of Transportation and Infrastructure and Department of Public Health and Environment respectively. One role of the Unauthorized Encampment Response Program is to be the steward of this data, which it has been doing since its creation in June of 2022.

The Unauthorized Encampment Response Program will be utilizing the database and program management tool NAVapp to centralize data and provide a consistent format for the input, tracking, and monitoring of data. Policies and procedures will be developed and finalized along the application and will be ready as agencies begin using the application. These policies and procedures will be documented in the program management plan.

<p><b>RECOMMENDATION 1.15</b>  <b>Monitor cleanup and assessments data</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should periodically monitor cleanup and assessments data to ensure accuracy. It should document these periodic reviews and revise policies and procedures as necessary.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 1.15**



The Unauthorized Encampment Response Program has been the steward of this data since its creation in June of 2022. This data is routinely updated and reviewed for accuracy. The review of this information is not formally documented but is done with regularity due to the importance of having this information accurate and available.

The policies and procedures outlining this review will be established alongside the development of NAVapp. These policies and procedures will be documented in the program management plan.

<p><b>RECOMMENDATION 1.16</b>  <b>Conduct a needs assessment</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should conduct a needs assessment to determine the most appropriate location for one or more property storage facilities as well as appropriate hours of operation to ensure equitable access by people experiencing homelessness. The city should consider transportation needs and options as part of its assessment. The contract with the city’s property storage service provider should be amended as necessary to align with changes to property storage hours and location.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>04/01/2024</p>	<p>Joey Hernandez 720-319-6534</p>

**Narrative for Recommendation 1.16**

The Department of Transportation and Infrastructure will conduct a needs assessment to determine if a change in location and/or hours for the storage facility or facilities is necessary.

<p><b>RECOMMENDATION 1.17</b>  <b>Document long-term property storage process</b>                  The Department of Transportation &amp; Infrastructure should work with its contractor to document the process for when property can be moved from the main storage facility to long-term storage. Transportation &amp; Infrastructure should document a City Attorney Office’s review of the policies and procedures to ensure they comply with legal requirements.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>06/30/2023</p>	<p>Joey Hernandez 720-319-6534</p>

**Narrative for Recommendation 1.17**

This will be completed along with recommendations 1.1, 1.2, 1.3, and 1.4.

<p><b>RECOMMENDATION 1.18</b>  <b>Provide equitable access to information</b>                  The city should go above and beyond the Lyall Settlement’s requirements by providing information related to cleanups and property storage equitably to people who have limited English proficiency or who have a disability. The city can conduct a language assessment, create a language access plan, or perform a comparison with other cities to identify an appropriate way to determine which languages it should use for communication. This process should be documented in policy and procedure.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 1.18**

The Unauthorized Encampment Response Program will continue with plans to translate notices and storage information to Spanish. The program will work alongside city agencies to identify the methodology of determining appropriate information translation needs.

<p><b>RECOMMENDATION 1.19</b>  <b>Provide consistent communication</b>                  The Department of Transportation &amp; Infrastructure should work with the City Attorney’s Office to revise notices at encampment sites to clearly state how long property will be kept at both the main storage facility as well as long-term storage. Notices should clarify that a person may have to visit the main storage facility more than once to retrieve any belongings being held off-site.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>04/20/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 1.19**

The notices the city currently has in use clearly state that items being stored at 1449 Galapago are moved offsite after 30 days for an additional 30 days of storage. The current postings also clearly highlight that individuals may contact 311 for more

information and/or to arrange for the pickup of their belongings. Anyone looking to retrieve their belongings after 30 days can call 311 to arrange a time to do so, and those belongings will be brought back to 1449 Galapago for them.

The 48-hour notice referenced in the Auditor’s report was updated on 12.05.2022 to clarify items stored at 1449 Galapago are moved offsite for an additional 30 days of storage.

To the extent possible, the city will amend the current language on the postings to reiterate the importance of contacting 311 to retrieve items stored over 30 days.

**AUDIT FINDING 2**

The city is not tracking expenses related to homeless encampments or sufficiently monitoring invoices and contract performance.

<p><b>RECOMMENDATION 2.1</b>  <b>Identify expenses to track</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with city agencies to determine how encampment-response expenses should be calculated and should identify which expenses should be included.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 2.1**

The Unauthorized Encampment Response Program will work alongside city agencies to identify which expenses should be included, the methodology, and calculations that need to be used when tracking encampment response expenses.

<p><b>RECOMMENDATION 2.2</b>  <b>Develop an expense tracking method</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop a method for tracking homeless encampment expenses, such as, but not limited to, using Workday tags.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 2.2**

This will be part of the methodology that is referenced in recommendation 2.1.

<p><b>RECOMMENDATION 2.3</b>  <b>Develop and document expense-tracking policies and procedures</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop and document policies and procedures for calculating annual encampment response-related expenses to ensure consistency across city agencies. Policies and procedures should be included in the program management plan.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 2.3**

As recommendations 2.1 and 2.2 are completed by the city, the Unauthorized Encampment Response Program will formalize and document these policies and procedures in the program management plan.

<p><b>RECOMMENDATION 2.4</b>  <b>Establish oversight of invoices</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with agencies involved in encampment response to identify a person within each agency to be responsible for reviewing and approving invoice payments — including reviewing supporting documentation — for encampment-related contracts used by multiple city agencies to ensure expenses are allowable and that the contractor fulfills contractual requirements.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 2.4**

The Unauthorized Encampment Response Program will work alongside agencies to determine the appropriate procedures for invoice processing and review for the respective agency.

<p><b>RECOMMENDATION 2.5</b></p>
----------------------------------

<p><b>Develop and document invoice policies and procedures</b></p> <p>The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with city agencies with encampment-related contracts to develop policies and procedures for requesting, reviewing, and maintaining supporting documentation for invoice payments to ensure invoices are paid according to contract requirements.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 2.5**

Reference response of recommendation 2.4.

<p><b>RECOMMENDATION 2.6</b></p> <p><b>Establish contract and master purchase order oversight</b></p> <p>The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with city agencies involved in encampment response to identify a person within each agency to be responsible for monitoring contract and master purchase order compliance and performance of contractors for encampment-related contracts and purchase orders used by multiple city agencies.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 2.6**

Reference response of recommendation 2.4.

<p><b>RECOMMENDATION 2.7</b></p> <p><b>Develop and document contract monitoring policies and procedures</b></p> <p>The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should work with city agencies with encampment-related contracts and master purchase orders to develop policies and procedures for monitoring compliance and performance.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities</b></p>	<p><b>Name and phone number of specific point of</b></p>

	<b>(Generally expected within 60 to 90 days)</b>	<b>contact for implementation</b>
Agree	12/31/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 2.7**

Reference response of recommendation 2.4.

<b>RECOMMENDATION 2.8</b> <b>Follow the city’s records retention policy</b> City agencies responsible for invoice payment and contract monitoring should comply with the city’s records retention policy related to invoice supporting documentation.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	12/31/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 2.8**

The city will continue to follow the records retention policy. While we already abide by this policy, the completion date aligns with the implementation of recommendation 2.4, 2.5, 2.6, and 2.7.

<b>RECOMMENDATION 2.9</b> <b>Ensure security services are provided</b> The Department of Transportation & Infrastructure and the Department of Public Health and Environment should identify and implement a method to ensure adequate security services are provided during all hours the property storage facility is open to the public in compliance with the Environmental Hazmat Services contract.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	03/01/2023	Joey Hernandez 720-319-6534

**Narrative for Recommendation 2.9**

The Environmental Hazmat Services contract is held by the Department of Public Health and Environment, but they are not the only agency that utilizes the contractor. The storage facility and its operation by Environmental Hazmat Services is overseen exclusively by the Department of Transportation and Infrastructure. The city continues to

ensure the storage facility operates at the agreed upon hours in the Lyall Settlement and will ensure that security is and will be present when the facility is open.

**AUDIT FINDING 3**

A draft city plan needs improvements to effectively guide city agencies in their responsibilities for unauthorized encampments.

<p><b>RECOMMENDATION 3.1</b>  <b>Document program need</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should document the need for the Denver Unauthorized Encampment Response Program, including a formal assessment of risks and stakeholder input, to inform the draft program management plan.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>07/01/2022</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 3.1**

While the process of conducting a programmatic risk assessment, gathering/analyzing data, and meeting with stakeholders was not formally documented, they were done in line with leading best practices mentioned by the Auditor’s report with the results recorded in the draft program management plan.

The Unauthorized Encampment Response Program was created to formalize coordination of such a complex citywide response. The 2022 Point-in-Time Count identified 1,313 individuals living unsheltered in Denver. The city continues to expand the personnel and teams dedicated to connecting people to the services they need. The city also has a continued need to address the public health and safety concerns that unauthorized encampments may present. Citizens of Denver filed 20,317 encampment related reports through 311 in 2021. That number jumped to 26,506 in 2022. The city has expanded the number of teams involved in this response, adding additional levels of coordination and communication needed to efficiently and equitably use the resources the city has available to address the needs of Denver’s housed and unhoused residents.

From March of 2022 to July of 2022, the city held working sessions consisting of all agencies involved in the encampment response to build out a formal risk register, identifying programmatic risks and contingencies that the program could experience as it was developed and implemented. The risk register was provided to the Auditor’s office on 07.25.2022.

As outlined in the draft of the program management plan provided to the Auditor office, the plan was developed with input from many stakeholders including city agencies,

service providers, people experiencing homelessness, and people with lived experience of homelessness.

<p><b>RECOMMENDATION 3.2</b>  <b>Establish timeline for goals</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop a timeline for achieving all program goals.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>10/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 3.2**

Some goals of the Unauthorized Encampment Response Program are designed to address complex issues with no end date such as compliance with applicable laws, addressing public health and safety concerns unauthorized encampments may present, and the elimination of the need for unauthorized camping. For goals such as this, the program will identify metrics to document progress and outcomes. The program will identify appropriate timelines for the other programmatic goals.

<p><b>RECOMMENDATION 3.3</b>  <b>Develop performance metrics for goals</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop performance metrics for all program goals.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>10/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 3.3**

The Unauthorized Encampment Response Program will identify the appropriate metrics to monitor for program goals. These metrics will be documented in the program management plan.

<p><b>RECOMMENDATION 3.4</b>  <b>Develop and document cleanup prioritization criteria</b></p>
---



The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should develop and document criteria for systematically determining how to prioritize encampment cleanups.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	12/31/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 3.4**

The Unauthorized Encampment Response Program currently utilizes public and environmental health assessments from the Department of Public Health and Environment and information provided by the Department of Safety to identify the locations that pose the greatest risk to not only those who may be around an encampment, but for those within the encampment as well. Criteria used includes trash and debris accumulation, right of way/ADA impediment, rodent/pest activity, improperly discarded sharps, biological waste, fire hazards, calls for service numbers, and proximity to sensitive locations such as schools.

The Unauthorized Encampment Response Program will continue to use and further refine the criteria documented as NAVapp continues to be developed. The application will collect this information for a specific location and provide a numerical score summarizing the severity of risks documented in the encampment. The city will use this score as a guide in the prioritization of large-scale encumbrance removals. Emergency public health or safety concerns will still need to be addressed regardless of the current numerical score a location may have.

<b>RECOMMENDATION 3.5</b>		
<b>Update and finalize the draft program management plan</b>		
The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should update its draft program management plan to identify all responsible parties, document policies and procedures for all agencies and teams involved in encampment response efforts — including enforcement, outreach, and cleanup — and establish a process for ongoing program monitoring. Once the draft plan is revised, the coordinator with the Mayor’s Office should finalize the plan.		
<b>Agree or Disagree with Recommendation</b>	<b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b>	<b>Name and phone number of specific point of contact for implementation</b>
Agree	12/31/2023	Matthew Wilmes 720-865-9060

**Narrative for Recommendation 3.5**

To the extent reasonably possible and in compliance with applicable laws and policies governing this information, the Unauthorized Encampment Response Program will update the program management plan to identify city agencies and teams involved with encampment response and document applicable policies and procedures.

The Unauthorized Encampment Response Program will determine when this version of the program management plan is complete. Recommendation 3.7 also indicates the need to revise the plan after reviewing leading best practices for program management. This recommendation and recommendation 3.7 will be done in conjunction.

<p><b>RECOMMENDATION 3.6</b>  <b>Monitor program effectiveness</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should use quality data to monitor program effectiveness and progress towards meeting the defined goals and objectives of the program.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 3.6**

In compliance with applicable law and the Lyall Settlement, the Unauthorized Encampment Response Program will utilize its centralized database and program management tool NAVapp to monitor necessary metrics as identified by the program with the understanding that certain data points and information are protected by policy governing other data systems, such as HMIS.

<p><b>RECOMMENDATION 3.7</b>  <b>Revise program management plan as needed</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should revise the Denver Unauthorized Encampment Response Program plan in line with leading practices and after reviewing the results of program monitoring, as necessary.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2023</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 3.7**

The Unauthorized Encampment Response Program was created to coordinate the citywide response to an ever changing and increasingly complex issue, and that response requires flexibility and adaptability. The Unauthorized Encampment Program will identify applicable revisions to the program management plan and ensure current versions of the plan are available to all teams involved in encampment response.

**AUDIT FINDING 4**

The city’s encampment response program may not be appropriately staffed to achieve its goals and responsibilities.

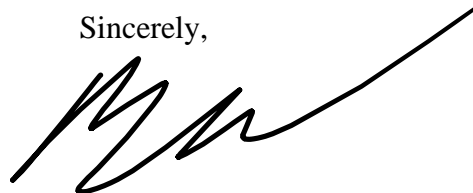
<p><b>RECOMMENDATION 4.1</b>  <b>Conduct staffing analysis</b>                  The Denver Unauthorized Encampment Response Program coordinated by the Mayor’s Office should conduct a formal staffing or workforce analysis to identify existing staffing levels across agencies involved in encampment response and determine needs to meet program objectives and goals.</p>		
<p><b>Agree or Disagree with Recommendation</b></p>	<p><b>Target date to complete implementation activities (Generally expected within 60 to 90 days)</b></p>	<p><b>Name and phone number of specific point of contact for implementation</b></p>
<p>Agree</p>	<p>12/31/2024</p>	<p>Matthew Wilmes 720-865-9060</p>

**Narrative for Recommendation 4.1**

The Unauthorized Encampment Response Program will work with the Peak Team and Office of Human Resources to identify the best process to conduct an analysis.

Please contact Matthew Wilmes at 720-865-9060 with any questions.

Sincerely,



Matthew Wilmes  
 Encampment Response Program  
 Executive

cc: Valerie Walling, CPA, Deputy Auditor  
 Dawn Wiseman, CRMA, Audit Director  
 Khari Eppstein, CIA, CGAP, Audit Manager