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

February 2, 2023

In keeping with generally accepted government auditing standards and Auditor’s Office policy, as authorized by city ordinance, we have a responsibility to monitor and follow up on audit recommendations to ensure city agencies address audit findings through appropriate corrective action and to aid us in planning future audits.

After following up on the “Safety and Security of City Facilities” audit report issued in June 2020, we determined the city fully implemented only nine of the 23 recommendations it agreed to. The other 14 are either partially or not implemented.

During the original audit, we found the city had not sufficiently prioritized city facility safety and security and that some existing initiatives were inadequate. For example, we found the city lacked a formal approach to performing and evaluating vulnerability assessments and it was not adequately educating employees on evacuation and drill procedures. We also found the city was not always receiving security services in line with the city’s contract or leading practices.

Based on our follow-up work, we determined the city did not fully address all the risks associated with our initial findings. Consequently, we may revisit these risk areas in future audits to ensure the city takes appropriate corrective action.

We appreciate the leaders and team members in the Mayor’s Office, the Department of General Services, the Department of Finance, the Office of Emergency Management and Homeland Security, the Department of Public Safety, and the Office of Human Resources who shared their time and knowledge with us throughout the audit and the follow-up process. Please contact me at 720-913-5000 with any questions.

Denver Auditor’s Office

Timothy M. O’Brien, CPA
Auditor
Safety and Security of City Facilities

Original Report Issued: JUNE 2020
Follow-up Report Issued: FEBRUARY 2023

Objective

The audit had three objectives:

1. To determine whether the city has clearly defined roles and responsibilities related to safety and security.
2. To examine whether the city has effective practices to ensure the safety and security of city facilities and its employees and the public.
3. To determine whether HSS Inc. is providing safety and security services in compliance with the city’s contract and in alignment with leading practices.

Background

The responsibility for ensuring city facility safety and security for employees and the public lies with multiple city agencies, including the Department of General Services and the Department of Finance, as well as with contracted security services.

In our first citywide audit of city facility safety and security, we identified an overall lack of citywide strategic planning around the safety and security of city facilities.

The City and County of Denver had not sufficiently prioritized the safety and security of city facilities

- The city lacked clearly defined roles and responsibilities for ensuring sufficient safety and security.
- The city’s lack of prioritization of safety and security resulted in a fragmented approach.

Existing safety and security initiatives for city facilities were not adequate

- The city lacked a formal approach to performing and evaluating vulnerability assessments.
- The city had not adequately educated employees on evacuation and drill procedures.
- The city’s policies and procedures for access and badging and for its employee notification system did not align with leading practices.

The city was not always receiving security services in alignment with contractual requirements or leading security practices

- The Department of General Services’ contract administration practices were insufficient to ensure effective oversight of the city’s contracted security services.
- Requirements in the city’s security services contract did not always clearly define performance measures.

WHY THIS MATTERS

Because the responsibility for ensuring city facility safety and security for employees and the public lies with multiple city agencies, the city should not only have a strategy but also clearly defined roles and responsibilities. To further help protect the people working in and visiting city buildings, the city needs to have effective processes for assessing risk, educating employees on evacuation and drill procedures, and monitoring security contractors.

FULLY IMPLEMENTED - 9
PARTIALLY IMPLEMENTED - 7
NOT IMPLEMENTED - 7

Denver Auditor Timothy M. O’Brien | (720) 913-5000 | www.denverauditor.org
Feb. 2, 2023

**Action Since Audit Report**

**Safety and Security of City Facilities**

23 recommendations proposed in June 2020

The city fully implemented nine recommendations made in the original audit report. The Mayor’s Office worked with other responsible city agencies to develop a strategic plan for ensuring safety and security of city facilities and to define roles and responsibilities. Additionally, the city updated two of three relevant executive orders and it has better processes to educate staff on evacuation and drill procedures.

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<thead>
<tr>
<th>Fully Implemented</th>
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**REMAINING RISKS**

The 14 recommendations the city did not fully implement present several lingering risks. Among them:

- The city has yet to complete vulnerability assessments, despite some initial planning for them. The Department of General Services said the assessments are time-consuming and officials intend to request more resources in 2024. Until then, the city risks being uninformed of each facility’s unique threat environment and it may not prepare appropriate countermeasures. While the city has made changes to some safety practices since the original audit, the lack of a structured approach to completing vulnerability assessments means the city continues to implement security efforts in reaction to specific incidents rather than proactively identifying risks.

- The city is still not ensuring some employees are appropriately trained on evacuation and drill procedures. Neither the Fire Department nor the city’s risk management division have a way to ensure all facility safety administrators complete the department’s new certification program for evacuation and emergency response training. Additionally, the Fire Department is still not tracking data related to drills, and it also has not reviewed and approved facility emergency procedures guides.

- The city's many different systems for identity, credential, and access management are still not integrated, hampering consistent oversight. Former city employees might still be able to access city facilities after they leave their jobs.

- General Services still does not have documented policies and procedures or required training to ensure its contract monitoring staff consistently monitor the performance of the city's contracted security services provider. While the city is giving more oversight for its new security services provider than its previous one, the city remains at risk of not receiving all services in line with its contract.
FINDING 1 | The City and County of Denver has not sufficiently prioritized the safety and security of city facilities

FULLY IMPLEMENTED

Recommendation 1.1

DEVELOP STRATEGIC PLAN – The Mayor’s Office should develop a strategic plan for ensuring safety and security of city facilities. This strategic plan should define the city’s mission, long-term goals, and approaches to monitor progress in addressing challenges and opportunities related to its mission as well as provide context for decisions made and consider risks. Progress should be measurable and objective based. Additionally, the plan should include a timeline for periodic review based on leading practices.

AGENCY ACTION

Agency’s original target date for completion: Jan. 14, 2021

The Mayor’s Office provided the “Interagency Facility Safety and Security Plan,” which details approaches, goals, and metrics for all agencies involved in citywide facility safety and security. The plan says this process is overseen by a new Facility Safety and Security Committee chaired by the Denver Security Office.

The plan defines the mission of the committee to protect security facilities and occupants from both human-caused and natural disasters and to protect life and property. The plan further outlines timelines and qualitative metrics for achieving seven critical, high-impact objectives and priorities. Among these priorities, city charter and executive orders are supposed to align with city practices to address facility vulnerability assessments.

The plan also lists specific approaches to monitoring progress as well as addressing challenges and opportunities. Some of these challenges include regulations, staff experience, and geographic location.

The plan instructs the Facility Safety and Security Committee to take all reasonable and appropriate actions necessary to protect facilities and occupants. If the plan is not followed, agencies are required to document and approve their specific processes. The plan also outlines the committee’s decision-making process through votes as well as attendance requirements for regularly scheduled meetings.

Finally, the plan calls for an informal review every year and a formal review every five years. The plan is also supposed to be reviewed when there are...
significant changes to the mission or threat environment.

Because of these detailed components, we consider this recommendation fully implemented.

### Recommendation 1.2

**DEFINE ROLES AND RESPONSIBILITIES** – The Mayor’s Office should work with the Department of General Services, the Department of Finance, the Department of Public Safety, and the Office of Emergency Management and Homeland Security, at minimum, to determine specific roles and responsibilities related to city facility safety and security.

### AGENCY ACTION

**Agency’s original target date for completion: Jan. 14, 2021**

The “Interagency Facility Safety and Security Plan” says all city agencies have a responsibility to ensure facility safety and security — and it lists some specific, identifiable roles for certain agencies such as the Department of General Services and the Office of Emergency Management. Assignment of roles and responsibilities also includes risks specifically mentioned in our original audit report such as those related to:

- Revising executive orders.
- Developing and implementing workplace safety practices.
- Overseeing contracted facility security personnel.
- Conducting facility vulnerability assessments.

The plan also says the Denver Security Office, the risk management division, the Office of Emergency Management, and the Department of Public Safety can provide support and subject-matter expertise.

Therefore, we consider this recommendation fully implemented.

### PARTIALLY IMPLEMENTED

### Recommendation 1.3

**UPDATE EXECUTIVE ORDERS** – After implementing Recommendation 1.2, the Mayor’s Office should work with the Department of General Services, the Department of Finance, the Department of Public Safety, and the Office of Emergency Management and Homeland Security to update executive orders 6, 65, and 85 — or to create a new executive order — to include defined roles and responsibilities and designated authority to those charged with city facility safety and security and to align with current and leading practices.
Agency's original target date for completion: May 14, 2021

The Office of Emergency Management and Homeland Security revised Executive Order No. 85 in September 2020. The changes increased emphasis on certain citywide plans, such as the emergency operations plan, and they streamlined other sections such as those related to following the National Incident Management System. Emergency Management also removed a section on reporting requirements to the federal government that was no longer relevant.

The Department of Finance drafted changes to Executive Order No. 65, which were reviewed and approved by the city's Executive Order Committee in November 2022. The revisions are being reviewed by city executive directors, and Finance managers said they expect the changes to be approved given the expertise of the many safety professionals who worked on it. The proposed changes relate to authority, new definitions, and new training requirements for city employees. They also assign roles and responsibilities as required by the recommendation.

Finally, while the Department of General Services took steps to inventory information on the city access systems and plans to work with the new Facility Safety and Security Committee to get more detail on city systems, it has not started revisions for Executive Order No. 6. The city's new "Interagency Facility Safety and Security Plan" outlines more considerations for the department to include when it drafts proposed revisions to the executive order such as updated policies around access and credential management.

Because the city successfully revised and implemented one of the three executive orders, made significant progress in getting the second implemented, and is working to revise the third, we consider this recommendation partially implemented.
FINDING 2 | Existing safety and security initiatives for city facilities are not adequate

FULLY IMPLEMENTED

Recommendation 2.3

AMEND EXECUTIVE ORDER NO. 65 – In conjunction with Recommendation 1.3, the Department of General Services and the Department of Finance should work with the Mayor’s Office to amend Executive Order No. 65 to clarify that additional procedures or related safety standards exist apart from the executive order itself. The Department of Finance’s Risk Management Office should communicate to those responsible for implementing and adhering to the executive order that these additional safety standards and procedures exist.

AGENCY ACTION

Agency’s original target date for completion: Aug. 12, 2021

The Department of Finance’s Risk Management Office proposed changes to Executive Order No. 65 as well as the corresponding Memorandum 65B. The revised order says safety standards will be included as a memorandum to the executive order. Additionally, it says all policies, standards, and procedures developed by Risk Management should be posted online. As mentioned in Recommendation 1.3, the changes to Executive Order No. 65 are being reviewed by city executive directors and have been approved by the Executive Order Committee.

We reviewed Memorandum 65B and found a list of — and links to — the health and safety standards the Risk Management Office implemented. We also reviewed the division’s website and found the safety standards were listed and that each link led users to the applicable standard. Finally, we reviewed a communication sent by the division to responsible city staff, which included a link to the division’s website for people to access the safety standards.

Therefore, we consider this recommendation fully implemented.
Recommendation 2.4

DOCUMENT ROLES AND RESPONSIBILITIES FOR EMERGENCY RESPONSE TEAM

– In conjunction with Recommendation 1.2, the Department of General Services and the Department of Finance should work with the Mayor’s Office to identify an agency responsible for implementing the emergency response team, and they should develop and document specific roles and responsibilities for those responsible for implementation.

AGENCY ACTION

Agency’s original target date for completion: Jan. 14, 2021

The city formed the Facility Safety and Security Committee, chaired by General Services’ Denver Security Office. The committee’s membership consists of 15 city agencies and outside organizations related to city operations to protect city facilities and their occupants from human-caused and natural disasters. The committee is charged with implementing the city’s “Interagency Facility Safety and Security Plan,” which was finalized in 2021.

The plan assigns the Risk Management and Workers’ Compensation Division with the responsibility to develop and implement workplace safety practices and programs to ensure a safe and healthy environment to minimize workers’ compensation claims. This includes developing and implementing the city’s emergency response and evacuation program as well as building specific emergency procedures guides. The plan also says the Denver Security Office, the Office of Emergency Management, and the Department of Public Safety can provide support and subject-matter expertise.

Therefore, we consider this recommendation fully implemented.

Recommendation 2.5

IMPLEMENT POLICIES AND PROCEDURES FOR EMERGENCY RESPONSE TEAM

– Following the implementation of Recommendation 2.4, the agency responsible for implementing the emergency response team should then develop and implement policies and procedures on how to do that, including tracking the existence of emergency coordinators for each agency and verifying training attendance. These policies and procedures should include noncity buildings that house city employees (i.e., leased spaces).

AGENCY ACTION

Agency’s original target date for completion: April 14, 2021

The Risk Management and Workers’ Compensation Division developed a policy and procedure for emergency response team training and emergency evacuation drills. It took effect Aug. 31, 2021. The policy lays out how to schedule emergency coordinator trainings and drills, how to document trainings and records of drills, who is responsible for leading various...
emergency response team trainings, and the roles and responsibilities for both evacuation drills and emergency response team members.

The policy says all documentation related to training and drills — including lists of emergency response team members, trainings, attendance reports, and drill records — are to be kept on an internal page managed by Risk Management and General Services’ Facilities Management Division. We reviewed the page and found it did contain lists of emergency response team members for various city buildings as well as emergency response team training materials with attendance sheets.

Lastly, the emergency response team policy specifies all city employees, including those working in leased locations or in the field, are required to have emergency response teams and to participate in related trainings. We reviewed training attendance records and found that employees in both city and noncity buildings attended emergency response team trainings.

Therefore, we consider this recommendation fully implemented.

**Recommendation 2.6**

**IMPLEMENT CERTIFICATION PROGRAM** – The Denver Fire Department should develop and implement a certification program for those charged with evacuation and emergency training.

**AGENCY ACTION**

*Agency’s original target date for completion: Jan. 14, 2021*

The Denver Fire Department developed a training for facility safety administrators, which is conducted by the department and the Department of Finance’s Risk Management and Workers’ Compensation Division. The training says a facility safety administrator is designated by the Denver Fire Code to be responsible for creating emergency procedures guides, implementing employee training and response procedures, conducting associated drills, and forming emergency response teams.

The fire department held the first facility safety administrator training in August 2022, and 12 people were certified. The fire department held two more trainings in November 2022, with nine more people becoming certified as facility safety administrators.

Therefore, we consider this recommendation fully implemented.
**Recommendation 2.10**

**DEVELOP EMPLOYEE EVACUATION AND EMERGENCY PROCEDURES TRAINING** – Following implementation of Recommendation 2.4, the agency responsible for implementing the emergency response team should work with the Office of Human Resources and the Denver Fire Department to develop citywide employee training related to evacuation and emergency procedures. The training should communicate information consistent with emergency procedures guides and the city’s new standard response protocols.

Additionally, as required by the international fire code, this training should be required upon employment and annually thereafter. Documentation of this training requirement should be included either in an executive order or through career services rules.

**AGENCY ACTION**

**Agency’s original target date for completion: Aug. 12, 2021**

The Risk Management and Workers’ Compensation Division developed an emergency preparedness training program with three virtual trainings on the city’s standard response protocols, active shooter awareness, and emergency response teams and evacuations.

We reviewed each training and found the standard response protocols training aligned with the information and five protocols we reviewed during our original audit. Additionally, the active shooter awareness training aligned with the principles of “run, hide, and fight” as well as other guidance included in the emergency procedures guides. Finally, the emergency response team and evacuation training aligned with the building emergency procedures guides and sometimes included more detail.

We also reviewed the proposed revisions to Executive Order No. 65 and Memorandum 65B that were approved by the city’s Executive Order Committee in November 2022. Proposed changes to the memorandum specify that active shooter awareness, emergency evacuation, and standard response protocol trainings are to be required for all new employees. Also, emergency evacuation and standard response protocol refresher trainings are to be required annually in line with the International Fire Code.\(^1\) The proposed memorandum also said active shooter awareness refresher training, which is not included as a requirement in the International Fire Code, is to be recommended only annually.

Therefore, we consider this recommendation fully implemented.

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Recommendation 2.15

DEFINE OUTCOMES AND TARGET GOALS – The Department of General Services, in conjunction with the Employee Notification System Governance Committee, should define its intended outcomes and target goals for assessing whether the employee notification system is effective and achieving its intended purpose.

AGENCY ACTION

Agency’s original target date for completion: Jan. 14, 2021

The Department of General Services provided an updated employee notification system policy that defines its intended outcomes and target goals for assessing system effectiveness. It says General Services will test the system every three months, using sampling and support from the city’s Technology Services agency.

In addition, the policy says it will conduct a test with all city staff at least once a year. In both quarterly and annual scenarios, the test is deemed successful if delivered to at least 95% of intended recipients.

The policy also says if any other agencies use the system as part of their emergency operation plans, the agency should test the application quarterly and review the results whenever a test is sent to 100 or more contacts. The results must be presented in detail at the next Employee Notification System Governance Committee meeting.

Although General Services staff provided us with only a draft policy, they told us the changes made in response to this recommendation were already approved by the governance committee. The potential changes the committee is still considering are not related to the goals and outcomes of the employee notification system but rather how other agencies will use the system.

Therefore, we consider this recommendation fully implemented.

PARTIALLY IMPLEMENTED

Recommendation 2.1

PRIORITIZE AND PLAN VULNERABILITY ASSESSMENTS – The Department of General Services should prioritize the completion of citywide facility vulnerability assessments either through a contract or by developing an assessment in line with leading practices, such as the Interagency Security Committee standards. As part of this prioritization, General Services should develop a timeline for completing all city facility assessments, including assessments of leased facilities that house city employees.
Agency’s original target date for completion: Jan. 14, 2021

According to the “Interagency Facility Safety and Security Plan,” completing vulnerability assessments is a priority and responsibility of the new Facility Safety and Security Committee. The committee is tasked with coordinating and reviewing regularly scheduled facility vulnerability assessments at all city-owned and leased facilities every three to five years.

According to the plan, committee members must work within their respective agencies to stagger assessments and use a tool for assessing safety and security risks, vulnerabilities, and threats. Furthermore, the plan says the Denver Police Department is responsible for conducting a facility vulnerability assessment on behalf of an agency when a specific and immediate threat arises.

As of December 2022, the Denver Security Office was only just conducting its first vulnerability assessment. The office expected to present it to the Facility Safety and Security Committee in January 2023, after our follow-up work was completed. Meanwhile, General Services plans to request more funding in 2024 based on the level of effort required for assessments.

As a result, we consider this recommendation only partially implemented.

Recommendation 2.7

ENSURE CERTIFICATION – Following the implementation of Recommendation 2.6, the Denver Fire Department should ensure those responsible for evacuation and emergency training are certified as required by the Building and Fire Code for the City and County of Denver.

Agency’s original target date for completion: Jan. 14, 2021

The Denver Fire Department implemented trainings for facility safety administrators beginning in August 2022. The fire department said it stores facility safety administrator licenses on its internal shared drive as well as in a third-party software and that it keeps only a list of people who have been licensed.

However, fire department officials said it was not their responsibility to maintain a list of people who must take the certification class. Staff said they can only tell a city building that it needs a facility safety administrator; they cannot make staff take the class. Additionally, they said it is on General Services and Risk Management staff to determine which employees should be responsible for facility safety administrator duties and who should become certified.

When asked whether General Services or Risk Management maintains a list
of people that need to be certified as facility safety administrators, officials from Risk Management said each building's facility superintendent is the facility safety administrator. Additionally, Risk Management staff work with the fire department to schedule the trainings and store copies of the licenses on the division's team site.

However, we found Risk Management's team site contained facility safety administrator licenses and training sign-in sheets, but it did not include a list of all facility superintendents or other employees that still need to be certified. Furthermore, the Risk Management employee responsible for scheduling facility safety administrator trainings and storing licenses said the list of certifications is not extensive because the program is relatively new.

While the fire department and Risk Management have started to certify facility safety administrators, neither is tracking all administrators required to take the training to ensure they become certified and that officials can follow up when administrators do not comply.

Therefore, we consider this recommendation only partially implemented.

**Recommendation 2.13**

**ASSESS EXISTING IDENTITY, CREDENTIAL, AND ACCESS MANAGEMENT** – In conjunction with Recommendation 2.1, the completion of citywide vulnerability assessments should include a review of existing identity, credential, and access management systems and processes to ensure they align with leading practices. Responsible city agencies should subsequently make changes based on identified vulnerabilities.

**AGENCY ACTION**

*Agency’s original target date for completion: Jan. 14, 2021*

The Department of General Services inventoried all the current access control systems in the city and created a vulnerability assessment template. The template includes specific questions in line with leading practices such as verifying whether access controls include a positive identification of all employees and visitors as well as processes for deactivating access badges. However, as mentioned, the city has yet to complete citywide vulnerability assessments, including those related to identity, credential, and access management systems which would allow them to make changes based on identified issues.

Therefore, we consider this recommendation only partially implemented.
### Recommendation 2.17

**ENSURE ACCURATE CONTACT INFORMATION** – The Department of General Services, in conjunction with the Employee Notification System Governance Committee, should continue to work with the Office of Human Resources to ensure existing employees’ and vendors’ contact information — including those of contractors, on-call employees, and volunteers — is as complete and accurate as possible.

#### AGENCY ACTION

*Agency’s original target date for completion: Jan. 14, 2021*

General Services staff told us they were sending automated quarterly emails prompting employees and vendors to update their Workday contact information. However, they could not provide evidence showing that any reminder emails were sent, nor could they share reports to show blank Workday fields had decreased. Managers said this was because the two city administrators responsible for that work recently left their jobs with the city.

General Services staff did provide two draft versions of the reminder emails. The draft emails are well-designed, easy to read, and meet the spirit of this recommendation.

However, without evidence showing the emails were sent to employees with missing contact information, we consider this recommendation only partially implemented.

### Not Implemented

#### Recommendation 2.2

**DOCUMENT IMPLEMENTATION RATIONALE** – The Department of General Services and other affected agencies should document a rationale for deciding whether to implement safety or security initiatives based on a formal vulnerability, or needs, assessment.

#### AGENCY ACTION

*Agency’s original target date for completion: Jan. 14, 2021*

The “Interagency Facility Safety and Security Plan” gives the Risk Management and Workers’ Compensation Division the responsibility for developing and implementing workplace safety practices and programs to ensure a safe and healthy environment. Since our original audit, the division created several new safety and security initiatives — including a virtual tool for the city’s emergency coordinators to use to check in during drills and emergency situations as well as emergency preparedness overviews for new hires. The virtual tool was created after 2021 fire drills indicated the
city's hybrid work schedule made it difficult for the emergency coordinators to determine whether office staff were missing and who they should report information to. The documents for new hires were created after the division found that new staff — especially those hired after 2020 — were unsure about the city’s emergency evacuation program and standard response protocols.

Risk Management leadership said the Facility Safety and Security Committee is establishing a subgroup to oversee all types of assessments and training in response to the demand. Unlike Risk Management, General Services managers told us additional safety or security initiatives have not been implemented.

While the city has made changes to its safety practices, the changes were not made based on a formal assessment. In our original audit, we noted the city had implemented policy changes without performing assessments or documenting the rational to determine and support if the changes were necessary. This lack of a structured approach means the city's implementation of security efforts and its identification of priorities continues to be in reaction to specific incidents instead of prompted through a proactive approach for identifying and prioritizing risks.

Therefore, we consider this recommendation not implemented.

**Recommendation 2.8**

**REVIEW AND APPROVE EMERGENCY PROCEDURES GUIDES** – The Denver Fire Department should review and approve building emergency procedures guides as required by the International Fire Code to ensure contents are consistent with the code and with department expectations. The fire department should retain documentation of this review and approval process.

**AGENCY ACTION**

*Agency's original target date for completion: Jan. 14, 2021*

Denver Fire Department staff said they review building emergency procedures guides every three years when a new International Fire Code is adopted. The 2021 International Fire Code has not yet been fully adopted, and as of November 2022, the International Fire Code’s website did not provide a definitive timeline for approval. Fire department staff said they anticipate the new fire code to be adopted in late 2022 or early 2023, and at that time, they would begin reviewing all 181 building emergency procedures guides.

Until the guides are reviewed and updated, we consider this recommendation not implemented.
Recommendation 2.9

**TRACK FIRE DRILL DATA** – The Denver Fire Department should track data and results related to fire drills to identify trends and inform future training needs.

**AGENCY ACTION**

*Agency’s original target date for completion: Jan. 14, 2021*

After each fire drill is completed, the Denver Fire Department fills out a “record of fire drill” form and writes a letter detailing a grade of pass, fail, or needs improvement along with observations from the drill that led to the grade. The letters are stored in a database for three years.

However, fire department officials said they are not tracking the results of these letters and could only compare the letters from year to year “to see if there is improvement or if things are trending in the wrong direction.” Department officials said they could not implement a tracking mechanism without starting a dedicated program “to identify and prioritize local risks” and the department was denied funding to begin such a program in 2023.

Even without the funding for the program, the Denver Fire Department could still use resources it already has, such as other data-tracking software or spreadsheets, to track fire drill data and results to identify trends and opportunities for training.

Therefore, we consider this recommendation not implemented.

Recommendation 2.11

**CENTRALIZE IDENTITY, CREDENTIAL, AND ACCESS MANAGEMENT** – In conjunction with Recommendation 1.2, the Mayor’s Office should work with agencies implementing identity, credential, and access management systems to identify an agency or agencies responsible for citywide identity, credential, and access management. Responsibility for identity management, credential management, and access management should be given to an agency or agencies to satisfy the purpose of each program consistent with federal guidance.

**AGENCY ACTION**

*Agency’s original target date for completion: Jan. 14, 2021*

In the new “Interagency Facility Safety and Security Plan” the Denver Security Office is responsible for ensuring city resilience specific to access control. In some instances, the office shares this responsibility with other departments, such as the Department of Public Safety and the Denver Police Department.

General Services identified all the city and county buildings the Denver Security Office oversees access management systems for. However, for 13 other access control systems, General Services will need to coordinate with
their administrative users to ensure the safety and security of the city, its employees, and its visitors.

A group within the Facility Safety and Security Committee is working to finalize proposed changes to Executive Order No. 6, which highlights identification requirements for employees and users of city facilities and assigns responsibility for management. Because the revisions are not yet complete, we consider this recommendation not implemented.

**Recommendation 2.12**

**UPDATE EXECUTIVE ORDER NO. 6** – In conjunction with Recommendation 1.3 and following the implementation of 2.11, the Mayor’s Office should work with responsible agencies to update Executive Order No. 6 to document roles and responsibilities and authority associated with identity, credential, and access management.

**AGENCY ACTION**

Agency’s original target date for completion: May 14, 2021

Executive Order No. 6 has not yet been revised. Department of General Services staff said the first step to propose revising the order was to inventory all city access systems, and we confirmed they completed this. Next, the new Facility Safety and Security Committee needs to work with individual agencies to develop a more detailed profile of each system they use. After that, the committee can make informed decisions about proposed changes to the executive order.

Therefore, we consider this recommendation not implemented.

**Recommendation 2.14**

**DEVELOP POLICIES AND PROCEDURES FOR IDENTITY, CREDENTIAL, AND ACCESS MANAGEMENT** – Following implementation of recommendations 2.11, 2.12, and 2.13, responsible agencies should develop and implement policies and procedures for identity, credential, and access management. The policies and procedures should include a periodic review of existing access and permissions to ensure individuals are afforded appropriate access and to ensure individuals no longer working for the city no longer have access or permissions.

**AGENCY ACTION**

Agency’s original target date for completion: May 14, 2021

The Department of General Services has not yet developed policies and procedures for identity, credential, and access management because
Recommendation 2.16

DEVELOP CONTACT INFORMATION POLICIES AND PROCEDURES – The Department of General Services, in conjunction with the Employee Notification System Governance Committee, should work with the Office of Human Resources to develop and implement policies and procedures to ensure Workday contact information for all new city employees and vendors — including contractors, on-call employees, and volunteers — is as complete and accurate as possible.

AGENCY ACTION

Agency's original target date for completion: Jan. 14, 2021

We requested updated policies and procedures describing how Workday contact information for all new city employees will be accurately updated. General Services staff could not find any relevant documentation and said the employees responsible for the policies and procedures had recently left their jobs with the city.

Without documented policies and procedures that align with leading practices, employee information in Workday may not be as up to date as possible.

Therefore, we consider this recommendation not implemented.
FINDING 3 | The city is not always receiving security services in alignment with contractual requirements or leading security practices

**FULLY IMPLEMENTED**

**Recommendation 3.3**

**DEVELOP WELL-DEFINED CONTRACT PERFORMANCE MEASURES** – The executive director of the Department of General Services should ensure any future city contract for security services includes well-defined performance measures that align with leading practices for performance monitoring in order to monitor the effectiveness of these services in accordance with Executive Order No. 8.

**AGENCY ACTION**

*Agency’s original target date for completion: Oct. 16, 2020*

In our original audit report, we found security services contract requirements did not always clearly define how to measure performance. We found room for improvement in three areas: security guard training, security staffing, and reporting. General Services made improvements in each area:

**SECURITY GUARD TRAINING** – The original contract did not have clearly defined training requirements identifying when security guard training should happen and how much training guards should receive once assigned to a city building. When comparing the new security contract to leading practices, we found the new contract is more detailed.

**SECURITY STAFFING** – The original contract did not require that written approval be obtained before making any changes to personnel requirements. The original audit report highlighted leading practices that required any changes to services lasting more than one week to include written notice. The new contract contains language consistent with these leading practices.

**REPORTING** – The original contract did not have reporting requirements to help ensure General Services and other city agencies receive information from the security services contractor in a timely manner. The new contract has improved requirements for the contractor to perform:

- Comprehensive reporting and analysis, which must be available in high-level and specific formats.
- Monthly reporting, which must include details of incidents and trend analyses.
• Annual comparative analysis with other Denver entities and other comparable cities.

General Services also implemented a quarterly scorecard process, which scores buildings from zero to 100. The scoring procedure requires individual issues ranked three or below to receive performance improvement plans, which must be developed within one week of receiving the score. The scorecard includes categories related to how the security services contractor handles emergency procedures and complies with officer training requirements.

As a result, we consider this recommendation fully implemented.

PARTIALLY IMPLEMENTED

Recommendation 3.1

DEVELOP AND IMPLEMENT CONTRACT MONITORING PROGRAM – The Department of General Services should develop and implement a contract monitoring program and function to monitor the effectiveness of contracted security services. The program should reflect performance and contract monitoring guidelines established in Executive Order No. 8 and align with leading practices for performance and contract monitoring.

AGENCY ACTION

Agency’s original target date for completion: Oct. 16, 2020

General Services developed an extensive scorecard that aligns with leading practices for contract monitoring. However, the department did not provide sufficient evidence to show the staff performing the monitoring are trained to complete the scorecards consistently.

Overall, the completed scorecards we reviewed contained very few comments explaining why low scores were given despite instructions saying comments were strongly suggested to give context to the scores. Because of the lack of specific examples and comments — particularly for low scores — the security failures observed by the contract monitoring staff may not be addressed.

Further, comments made by contract monitoring staff on some of the scorecards suggested they did not fully understand the scoring process. Meanwhile, two buildings received near perfect outlier scores with almost no comments.

Although General Services made improvements to its contract monitoring process by developing a quarterly scorecard to be completed at each
facility, contract monitoring staff are not using the scorecards consistently, and General Services did not document specific procedures for completing the form or provide formal training.

Therefore, we consider this recommendation only partially implemented.

**Recommendation 3.2**

**ASSESS AND UPDATE POST ORDERS** – The Department of General Services' Denver Security Office should coordinate with the city’s contracted security services to ensure all post orders outlining required duties for contracted security guards reflect the city's current operational security expectations and align with leading practices.

**AGENCY ACTION**

*Agency’s original target date for completion: Oct. 16, 2020*

General Services provided updated post orders, which are an improvement from our original audit. However, some inconsistencies remain.

Certain emergency procedures are still missing from some post orders. For example, the Lindsey-Flanigan Courthouse post orders are missing emergency procedures for fires, bomb threats, and power outages.

Policies and procedures are also still missing for some required positions. For example, the City and County Building post orders do not include policies and procedures for the required closed-circuit TV operator.

The post orders remain insufficient to ensure the city’s contracted security services provider fully complies with the city’s contract and provides services in line with national leading practices.

Therefore, we consider this recommendation only partially implemented.
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.

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

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We deliver independent, transparent, and professional oversight in order to safeguard and improve the public's investment in the City and County of Denver. Our work is performed on behalf of everyone who cares about the city, including its residents, workers, and decision-makers.