

# FOLLOW-UP REPORT

The Mayor's Office of Social Equity and Innovation  
***City Equity Program and  
Practices***

FEBRUARY 2025



**TIMOTHY M. O'BRIEN, CPA**  
DENVER AUDITOR

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# City and County of Denver



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## AUDITOR'S LETTER

February 6, 2025

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.

In August 2022, we audited the City Equity Program and Practices and found risks involving an insufficiently detailed strategic plan, an unclear executive order, and no plans for clearly and consistently communicating with other city agencies. The Mayor's Office of Social Equity and Innovation agreed to implement all 16 recommendations.

We recently followed up and found the office fully implemented two recommendations, partially implemented seven, and did not implement seven recommendations.

Although the Mayor's Office of Social Equity and Innovation has made notable progress, it did not fully address all the risks associated with our original findings — some of which are significant to its intended purpose. 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 of Social Equity and Innovation 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

A handwritten signature in black ink, appearing to read "Timothy M. O'Brien".

Timothy M. O'Brien, CPA  
Auditor

## City Equity Program and Practices

Original report issued:  
AUGUST 2022

Follow-up report issued:  
FEBRUARY 2025

### Objective

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

### Background

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

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

### The Mayor's Office of Social Equity and Innovation lacked a detailed strategic plan and other foundations for effective governance

Previous leaders of Social Equity and Innovation did not:

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

### The executive order establishing the Mayor's Office of Social Equity and Innovation provided insufficient clarity to empower staff

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

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

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

### The Mayor's Office of Social Equity and Innovation did not have a plan to ensure clear, consistent communication with other city agencies

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

#### Why this matters

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



2

FULLY IMPLEMENTED



7

PARTIALLY IMPLEMENTED



7

NOT IMPLEMENTED

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# Action since audit report

## City Equity Program and Practices



16 recommendations proposed in August 2022

The Mayor's Office of Social Equity and Innovation fully implemented two recommendations made in the original audit report. However, the office only partially implemented seven others and it has not taken steps to address the risks seven other recommendations had sought to resolve.

Documenting succession and contingency plans will allow the Office of Social Equity and Innovation to better continue its work when key staff members leave the office. And the creation of alternative, hybrid training methods for its equity and race and social justice trainings allows city employees additional flexibility to attend live sessions, virtual sessions, or access trainings in a self-directed format which maximizes the number of employees who can complete trainings.



FULLY  
IMPLEMENTED

2



PARTIALLY  
IMPLEMENTED

7



NOT  
IMPLEMENTED

7

## Remaining risks

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

- The Mayor's Office of Social Equity and Innovation did not conduct a needs assessment to ensure the office's initiatives are meeting the needs of the city. Without this assessment, Social Equity and Innovation cannot ensure it is meeting the city's most important equity concerns and that its initiatives align with the office's goals and strategies.
  - Social Equity and Innovation does not have formal performance metrics to monitor the success of its programs. While the office does have draft performance metrics in development and does track data on training completion, the lack of implementing and tracking formal performance metrics limits the office's ability to ensure its programs are achieving its intended outcomes.
  - The office has not documented a decision-making process or held meetings to consider whether the Office of Social Equity and Innovation should continue to be codified in Executive Order No. 146 or by other means, such as city ordinance. If Social Equity and Innovation's role and responsibilities continues to exist only by executive order, it risks future mayors closing the office or substantially changing its mission.
  - Social Equity and Innovation has not conducted a staffing analysis to determine whether the office has sufficient resources to participate in the budget equity process. Without sufficient staffing and resources, the office may not be able to address equity in the city's budget as effectively as desired.
-

# FINDING 1 | The Mayor’s Office of Social Equity and Innovation lacks a detailed strategic plan and other foundations for effective governance

RECOMMENDATION	IMPLEMENTATION STATUS
1.1 Review and update existing program design	<span style="color: blue;">●</span> PARTIALLY IMPLEMENTED
1.2 Assess needs the office should address	<span style="color: red;">●</span> NOT IMPLEMENTED
1.3 Develop and document a strategic plan	<span style="color: red;">●</span> NOT IMPLEMENTED
1.4 Ensure consistent mission, goals, and strategies	<span style="color: red;">●</span> NOT IMPLEMENTED
1.5 Document policies and procedures	<span style="color: blue;">●</span> PARTIALLY IMPLEMENTED
1.6 Develop and document succession and contingency plans	<span style="color: green;">●</span> FULLY IMPLEMENTED
1.7 Implement performance metrics	<span style="color: red;">●</span> NOT IMPLEMENTED
1.8 Identify agency-specific equity personnel	<span style="color: red;">●</span> NOT IMPLEMENTED

## Recommendation 1.1

**REVIEW AND UPDATE EXISTING PROGRAM DESIGN** – Consulting leading practices, the Mayor’s Office of Social Equity and Innovation should review and update its existing program design and then document all elements of the office — including:

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



**PARTIALLY  
IMPLEMENTED**

**Agency’s original target date for completion: Nov. 23, 2022**

### SUMMARY OF AGENCY ACTION

At the start of this follow-up in April 2024, we received seven documents, which we were told represented the Mayor’s Office of Social Equity and Innovation’s program design, these included:

- A strategic plan.
- An action plan.
- Three logic models for multi-agency projects, the “Racial Equity Action

Plans,” and the “Racial & Social Justice Academy” used to train city employees.

- The office’s selected metrics.
- An outline for addressing stakeholder concerns.

We were told that many of the original staff from the Mayor’s Office of Social Equity and Innovation who provided this documentation have since left but that the provided program design documents reflect their intentions. The new leaders confirmed they are reevaluating the program design.

To determine whether the program design was reviewed and updated, we checked to see whether the four components outlined in the original recommendation were completed. These components include:

- Alignment with Executive Order No. 146 and citywide goals and priorities.
- Documentation of specific goals and strategies.
- A detailed logic model.
- A plan for monitoring and evaluating program success.

We found that only one of the seven documents for program design, the strategic plan, details its alignment with Executive Order No. 146 and citywide goals and priorities. Five of the seven documents only align with citywide goals and priorities but do not specifically address alignment with the executive order. Lastly, the remaining document, the outline for addressing stakeholder concerns, does not include how it aligns with either Executive Order No. 146 or citywide goals and priorities.

In our review of the program design, we also found that the selected metrics document was informal and not structured. When we asked whether the selected metrics were the only monitoring or evaluation plans, we were told that the office is revamping the process for evaluating the success of its efforts. The office is emphasizing defining measurable inputs, outputs, and outcomes through its “Racial Equity Action Plans” on a dashboard.

However, as of November 2024, the planned evaluation and monitoring through the dashboard was still in development. Furthermore, the office’s intention of using the “Racial Equity Action Plans” as a method of monitoring and evaluating the office’s programs and initiatives was not included in the existing program design provided to us.

Despite these gaps, we found that specific goals and strategies were documented in the strategic plan. Also, all three logic models specify office activities, staffing, resources, results, and expected outcomes.

As a result, we consider this recommendation partially implemented.

**Recommendation 1.2**



**NOT  
IMPLEMENTED**

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

**Agency’s original target date for completion: Nov. 23, 2022**

**SUMMARY OF AGENCY ACTION**

The Mayor’s Office of Social Equity and Innovation engaged a third-party company to conduct a needs assessment that examined the office’s internal operations, management processes, and practices. The assessment identified and recommended improvements in staffing, processes, technology, and office culture.

However, the needs assessment did not fulfill the requirements of the original recommendation. Specifically, it should have assessed the office and its initiatives to ensure it meets identified city needs by clearly defining the city’s equity issues, explaining how these issues align with the office’s goals and strategies, and demonstrating alignment with Executive Order No. 146.

Instead, the conducted assessment focused on internal operations and the culture of the Mayor’s Office of Social Equity and Innovation, rather than evaluating whether the office is equipped to address the city’s equity needs. The needs assessment also did not identify the city’s equity needs and did not provide any insight into how identified equity issues would align with the office’s goals, strategies, or Executive Order No. 146.

As a result, we consider this recommendation not implemented.

### Recommendation 1.3



**NOT  
IMPLEMENTED**

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

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

**Agency’s original target date for completion: Nov. 23, 2022**

#### **SUMMARY OF AGENCY ACTION**

The Mayor’s Office of Social Equity and Innovation developed a strategic plan; however, it is missing several critical elements outlined in the original recommendation.

While the plan includes a clearly defined mission statement, we found other elements are incomplete or missing. The strategic plan lists 42 objectives, but we found none of the objectives are both specific and measurable.

In evaluating the strategic plan, we also reviewed other documents provided by the office that form part of the overall strategic planning process. These documents, while not the strategic plan itself, were intended to support its development and implementation. By examining these materials, we aimed to understand how the office’s broader strategic framework aligns with the minimum requirements of the recommendation.

As part of the strategic planning documents, the office provided a selected metrics document. Staff described the document as outdated, explaining that it was initially used to identify areas for data evaluation and early performance metrics, but it no longer reflects the office’s key performance metrics. Instead, office staff said that the “Racial Equity Action Plans” will serve as an updated version of the office’s key performance metrics. The “Racial Equity Action Plans” emphasize defining measurable inputs, outputs, and outcomes for its programs and initiatives. The plans will be tracked using a dashboard. However, as of November 2024, the “Racial Equity Action Plans” dashboard was still in development with an expected launch in early 2025. In addition to the dashboard being in development, the key performance metrics outlined in the plans are not included in the strategic plan.

The office also provided an outline for addressing stakeholder’s concerns along with its strategic plan. It describes strategies to gather feedback

through building relationships with city agencies, holding regular meetings, and leading trainings. However, we were not provided with evidence that stakeholders' feedback has been collected or analyzed. Additionally, within the strategic plan, one of the goals addresses the need to analyze external factors and stakeholder concerns. However, the strategic plan does not specify how the collected feedback will be analyzed. As such, the effectiveness of an analysis method is unknown.

Additionally, while the action plan we received provides specific activities and time frames for implementing strategies, it does not list associated costs or designated responsibilities for implementing those strategies.

Overall, the strategic plan and process meets only one of the minimum requirements outlined in the original recommendation – a clearly defined mission statement.

Because the plan lacks specific and measurable objectives, updated metrics, cost and responsibility designations, and a detailed feedback analysis process, we consider this recommendation not implemented.

#### Recommendation 1.4



**NOT  
IMPLEMENTED**

**ENSURE CONSISTENT MISSION, GOALS, AND STRATEGIES** – The Mayor's Office of Social Equity and Innovation should ensure its mission, goals, and strategies are consistent across Executive Order No. 146, all strategic planning documents, and all office communications.

**Agency's original target date for completion: Nov. 8, 2022**

#### **SUMMARY OF AGENCY ACTION**

The Mayor's Office of Social Equity and Innovation provided two documents containing the office's mission, goals, and strategies – a mission and vision document and a 2024 goals document. We used these to evaluate its consistency across Executive Order No. 146, the office's strategic planning documents, and office communications. We found several inconsistencies:

- The two documents provided as examples had different missions, goals, and strategies with each other and with the office's mission, goals, and strategies as outlined in Executive Order No. 146 and in several of the office's strategic planning documents.
- The strategic plan's goals loosely align with the documents provided, focusing on creating an equitable city and improving communication with city agencies. However, the goals in the strategic plan are broad in scope, whereas the two documents the agency provided include specific targets for certain programs.

- We also received an example of office communication, which was intended for both internal and external use. The communication lacked alignment with the two documented examples as the communications did not provide a mission statement and the goals and strategies were different.
- Another communication from the office that we reviewed aligned with only one of the mission statements from the provided examples.

Because the mission, goals, and strategies differ between the two documents provided by the Office of Social Equity and Innovation and do not align with those in Executive Order No. 146, the strategic planning documents, or office communications, we consider this recommendation not implemented.

### Recommendation 1.5

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

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



**PARTIALLY  
IMPLEMENTED**

**Agency’s original target date for completion: Sept. 23, 2022**

#### **SUMMARY OF AGENCY ACTION**

The Mayor’s Office of Social Equity and Innovation has taken several steps to implement Recommendation 1.5 by creating and maintaining a comprehensive set of policies and procedures and establishing processes for communication and review. However, despite these efforts, we found that several gaps remain, including incomplete or unapproved policies, inconsistent approval processes, and, in some cases, an insufficient review process. These gaps prevent Social Equity and Innovation from fully meeting the recommendation and ensuring clear guidance and consistent processes for its staff.

Social Equity and Innovation has developed and shared its policies and procedures, which encompass governance, equity initiatives, communications, and a broad range of office operations and initiatives.

Only eight out of 17 policies and procedures provided have been successfully developed, approved, and implemented. The completed procedures – such as the job-orientation process, the equity, diversity, and inclusion team procedures, and data analysis and evaluation process – effectively define key roles and responsibilities and ensure institutional knowledge is retained.

Nine out of 17 policies remain incomplete or pending approval. For example, the general operations and safety notifications policies lack essential components, such as defined roles and background information. Additionally, some policies, like those around the Racial Equity Council and the “Racial Equity Action Plans” are pending approval despite being implemented.

We learned that Social Equity and Innovation’s policies and procedures are made accessible to staff through its internal document sharing site. Additionally, policies and procedures are shared with all new hires as part of the orientation process.

Social Equity and Innovation established a process for periodic policy review – outlined in its 2024 policy review plan – which notes that quarterly reviews are conducted by the director of operations and innovation – with annual updates scheduled for all policies. Despite this framework, we found that some policies are incomplete or have been pending for over a year. This lack of adherence to the review schedule suggests the office needs stronger process oversight.

The progress made in developing and communicating policies and procedures, combined with the identified gaps – such as incomplete and unapproved policies – indicates that risks remain.

As a result, we consider this recommendation partially implemented.

### Recommendation 1.6

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



**FULLY  
IMPLEMENTED**

**Agency’s original target date for completion: Sept. 23, 2022**

#### **SUMMARY OF AGENCY ACTION**

The Mayor’s Office of Social Equity and Innovation developed and documented a detailed succession and contingency plan. The office’s succession policy and procedure aims to minimize operational disruptions in the event of staff departures, including sudden resignations, retirements,

or extended leaves. The policy outlines that Social Equity and Innovation’s leaders will temporarily assume the duties of any departing staff member until the role is reassigned. In addition, the policy emphasizes professional development, cross-training, and knowledge-sharing opportunities, such as mentoring and shadowing, to create a pool of talent and maintain institutional knowledge.

Social Equity and Innovation has also thoroughly documented staff roles and responsibilities, which are vital for identifying critical positions and determining appropriate succession strategies. Job descriptions for key positions, such as the chief equity officer, director of operations, and other leadership roles are clearly outlined, with responsibilities defined. These documents, along with the succession policy, form a solid foundation for addressing staff turnover and ensuring that roles are filled with qualified individuals.

To ensure that these policies are communicated effectively, Social Equity and Innovation stores them in an operations manual, accessible to all staff on its internal document storage site. New employees are provided with the manual during onboarding, and updates are communicated via email. This ensures staff are informed about the procedures in place to manage staff changes and can reference the succession plan as needed.

Therefore, we consider this recommendation fully implemented.

**Recommendation 1.7**



**NOT  
IMPLEMENTED**

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

**Agency’s original target date for completion: Nov. 23, 2022**

**SUMMARY OF AGENCY ACTION**

The Office of Social Equity and Innovation has made progress in defining goals and tracking some activities related to the city’s social equity, race, and social justice initiatives. However, its performance measurement framework remains incomplete, potentially limiting the office’s ability to assess progress or achieve its goals effectively.

While the office provided a draft of its key performance indicators, such as developing more trainings for city employees and developing city agencies’ “Racial Equity Action Plans,” these metrics mainly focus on activities rather than measuring the success of the city’s social equity and race and social

justice efforts. Furthermore, we found several objectives outlined in the strategic plan lack corresponding key performance indicators, which makes tracking progress and measuring performance difficult.

The absence of finalized key performance indicators presents several ongoing challenges:

- Social Equity and Innovation does not have a standardized procedure for defining and monitoring metrics.
- Efforts to track performance rely on informal methods, such as project-based goals or training dashboards, rather than an established framework.
- Tools, such as dashboards to monitor metrics like the “Racial Equity Action Plans” are under development and not operational.
- Clear timelines and responsibilities for tracking and reporting progress are not established.

Although some draft performance indicators align with the office’s strategic goals, many objectives outlined in its strategic plan remain unaddressed. For instance, broader goals, such as improving racial equity within agencies, lack measurable indicators tied to specific timelines or targets.

To address these potential challenges, Social Equity and Innovation should prioritize finalizing specific, measurable, achievable, relevant, and time-bound key performance indicators. Additionally, it should ensure that tracking systems are fully operational, integrated into daily workflows, and supported by clearly defined roles and responsibilities for monitoring the office’s goals.

Without finalized key performance indicators, dashboards, or formal reporting procedures, Social Equity and Innovation is unable to monitor outcomes and inform data-driven improvements effectively.

Because the Office of Social Equity and Innovation has not developed and documented key performance indicators to track the success of the city’s equity, race, and social justice efforts, we consider this recommendation not implemented.

**Recommendation 1.8**



**NOT  
IMPLEMENTED**

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

**Agency’s original target date for completion: Nov. 8, 2022**

**SUMMARY OF AGENCY ACTION**

The Office of Social Equity and Innovation lacks a standardized and fully documented process for identifying and collaborating with independent equity staff across city agencies.

Social Equity and Innovation relies on informal methods to identify new agency-specific equity staff, such as through conversations with agency leaders, shared job postings, or invitations to participate in the hiring process. While these methods can be effective in certain instances, it is inconsistent and fails to ensure alignment between agency-specific equity staff and Social Equity and Innovation’s citywide equity goals.

Social Equity and Innovation provided us with a list of agencies employing their own equity staff, including Denver International Airport, the Denver Department of Public Health and Environment, Denver Public Library, and Denver Human Services. However, because no formal identification process exists, we could not verify the completeness or accuracy of the list.

Social Equity and Innovation’s leaders explained that alignment between the office and agency-specific equity staff is achieved by embedding citywide equity goals into agency-specific work through the “Racial Equity Action Plans.” These plans include measurable success metrics that are developed collaboratively with agencies’ equity, diversity, and inclusion teams. Leaders said that Social Equity and Innovation staff work closely with agency-specific equity staff to ensure the implementation of citywide goals by providing feedback, cocreating training programs, and coleading equity, diversity, and inclusion teams.

However, the lack of formal documentation and a well-structured process meant we could not verify or measure the extent of Social Equity and Innovation’s influence or the consistency of agency-specific staff’s participation in these initiatives.

According to Social Equity and Innovation managers, “each agency is unique in its mission and goals,” which necessitates a nonprescriptive approach. Agencies with dedicated equity staff independently establish roles and responsibilities to address agency-specific needs, consulting Social Equity and Innovation for guidance on job descriptions and other advisory matters.

While this flexibility helps agencies customize equity efforts to meet their specific needs, the absence of a systematic approach to coordinating equity staff across agencies jeopardizes the city's ability to maintain a unified strategy for achieving citywide equity goals.

To align efforts across agencies, the Mayor's Office of Social Equity and Innovation has proposed reestablishing the Equity Core Council, but this initiative has yet to be formalized. The council aims to promote partnerships, coordination, and shared learning among city agencies to create equitable systems and solutions for city employees and Denver residents. However, without clear guidelines for agency equity staff participation or a formal structure, its potential impact remains unknown.

While there are some informal collaborative methods in place, such as quarterly meetings and an equity, diversity, and inclusion communication channel, they lack the consistency and accountability needed to align all agencies with the city's equity goals.

Social Equity and Innovation needs a formal and standardized process to work effectively with agency-specific equity staff and to create a more coordinated approach to racial and social justice. Without this, the city risks continuing with an informal and less effective equity strategy.

As a result, we consider this recommendation not implemented.

## FINDING 2 | The executive order establishing the Mayor’s Office of Social Equity and Innovation provides insufficient clarity to empower staff

RECOMMENDATION	IMPLEMENTATION STATUS
2.1 Review and revise Executive Order No. 146	● PARTIALLY IMPLEMENTED
2.2 Evaluate the future of Executive Order No. 146	● NOT IMPLEMENTED
2.3 Ensure agencies comply with Executive Order No. 146	● PARTIALLY IMPLEMENTED
2.4 Explore alternative training methods	● FULLY IMPLEMENTED
2.5 Identify budget personnel	● PARTIALLY IMPLEMENTED
2.6 Document activities for the budget equity process	● PARTIALLY IMPLEMENTED
2.7 Evaluate staffing and resources for the budget equity process	● NOT IMPLEMENTED

### Recommendation 2.1

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

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

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



**PARTIALLY  
IMPLEMENTED**

**Agency’s original target date for completion: Nov. 8, 2022**

#### SUMMARY OF AGENCY ACTION

Executive Order No. 146, originally signed on June 1, 2020, was revised on Dec. 10, 2022, by the city’s former mayor. To determine whether the order was updated according to our recommendation, we compared the previous and revised versions.

We focused on whether the updates addressed five key areas: enhancing authority, clarifying the roles and responsibilities of other agencies, whether equity trainings for city staff are mandatory, defining the Mayor’s Office of Social Equity and Innovation’s role in the city’s budget equity process, and providing a clear explanation of a “citywide equity scan.” We found:

- The Office of Social Equity and Innovation was granted more specific authority to guide the city’s commitments to addressing and eliminating racial inequities and social injustices by leading interdepartmental collaborations with mayoral agencies and departments. Mayoral agencies were also instructed to collaborate with the Office of Social Equity and Innovation to achieve its goals.
- The revised order specified mayoral agencies must provide information and data to Social Equity and Innovation, affirm their commitment to completing citywide equity trainings, develop “Racial Equity Action Plans,” and support the equity, diversity, and inclusion teams responsible for implementing those plans.
- The revised order remains vague on whether trainings are mandatory and whether the office has the authority to ensure city employees complete training. The revised order only says that mayoral appointees must affirm their commitment to completing citywide equity trainings.
- The Office of Social Equity and Innovation was charged with providing guidance in supporting the city’s budgeting process each year and ensuring a documented equity analysis is included in the annual budget manual.
- The revised executive order removed any mention of a “citywide equity scan.” In our original audit report, Social Equity and Innovation staff were not conducting these scans and were either unaware or uncertain of what an equity scan was supposed to be.

While the executive order’s revisions strengthened the Office of Social Equity and Innovation’s authority, clarified agency roles, and enhanced its involvement in the budgeting process, the lack of clarity on whether equity trainings are mandatory creates gaps in fully achieving the order’s goals.

Given the updated executive order met four of the five elements of the recommendation, we consider this recommendation partially implemented.

**Recommendation 2.2**



**NOT  
IMPLEMENTED**

**EVALUATE THE FUTURE OF EXECUTIVE ORDER NO. 146** – As the Mayor’s Office of Social Equity and Innovation works with the Mayor’s Office to review Executive Order No. 146 as part of implementing Recommendation 2.1, it should consider whether an executive order is the appropriate method for achieving agencies’ compliance with the city’s equity initiatives or whether Social Equity and Innovation and its efforts should be codified by other means, such as in city ordinance. Social Equity and Innovation should document its decision and the decision-making process it used.

**Agency’s original target date for completion: Nov. 8, 2022**

**SUMMARY OF AGENCY ACTION**

Mayor’s Office of Social Equity and Innovation managers said they did not have serious discussions with the Mayor’s Office. The chief equity officer only met with Mayor’s Office staff to discuss amending Executive Order No. 146 in response to the Office of Neighborhood Safety being added to Social Equity and Innovation.

However, because discussions with the Mayor’s Office to discuss whether codifying Social Equity and Innovation’s responsibilities in an executive order was the most appropriate method or not did not take place, we consider this recommendation not implemented.

**Recommendation 2.3**



**PARTIALLY  
IMPLEMENTED**

**ENSURE AGENCIES COMPLY WITH EXECUTIVE ORDER NO. 146** – The Mayor’s Office of Social Equity and Innovation should work with the Mayor’s Office to obtain the support it needs to ensure all agencies under the mayor comply with Executive Order No. 146. The office should document these discussions and any efforts to gain agencies’ compliance.

**Agency’s original target date for completion: Nov. 8, 2022**

**SUMMARY OF AGENCY ACTION**

We found the Mayor’s Office of Social Equity and Innovation completed some, but not all aspects of the recommendation.

Office staff did not work closely with the Mayor’s Office and failed to document the limited meetings that were held. Additionally, as of August 2024, the “2024 Equity Commitment Letter,” meant to secure commitment from mayoral appointees and executive directors to support Social Equity and Innovation’s work, was neither finalized nor signed by appointees.

Despite these gaps, the Mayor’s Office of Social Equity and Innovation has made strides in engaging with mayoral agencies by mostly following the requirements of Executive Order No. 146.

The executive order requires agencies to develop “Racial Equity Action Plans,” which are supported by their equity, diversity, and inclusion teams. We found evidence that the Mayor’s Office of Social Equity and Innovation and city agencies made progress in managing their plans and equity, diversity, and inclusion teams, as reflected in discussions during the office’s quarterly meetings. During these meetings, Social Equity and Innovation staff discussed agency action plans, agency equity teams’ responsibility for developing and executing equity plans, and held workshops with agency equity teams to develop needs assessments and actions to address individual agency’s needs.

However, because the Mayor’s Office of Social Equity and Innovation did not finalize the equity commitment letter nor get signatures from appointees, we consider this recommendation partially implemented.

**Recommendation 2.4**

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



**FULLY  
IMPLEMENTED**

**Agency’s original target date for completion: Sept. 23, 2022**

**SUMMARY OF AGENCY ACTION**

We found the Mayor’s Office of Social Equity and Innovation met with the Office of Human Resources to discuss training courses on equity, racial, and social justice for employees and developed hybrid training programs for city employees.

Efforts to create a hybrid training program were underway throughout the original audit, and the hybrid training model was made fully accessible to the city by 2023. Additionally, the Mayor’s Office of Social Equity and Innovation met with the Office of Human Resources several times, from 2023 through 2024, to discuss possible training types, upcoming trainings, and training partnership opportunities.

We confirmed the offered training program was hybrid – meaning city employees can attend live sessions, virtual sessions, or access trainings in a self-directed format.

Finally, we reviewed data from the Mayor’s Office of Social Equity and Innovation, presented during quarterly meetings and found 83% of city employees had participated in the training academy by September 2023, confirming the trainings were accessible to city employees.

Therefore, we consider this recommendation fully implemented.

### Recommendation 2.5

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



**PARTIALLY  
IMPLEMENTED**

**Agency’s original target date for completion: Sept. 23, 2022**

#### **SUMMARY OF AGENCY ACTION**

The Mayor’s Office of Social Equity and Innovation said it worked with the Budget and Management Office to develop a procedure to identify city staff new to the budget equity process. This procedure includes connecting with agency leaders and staff through budget kickoff meetings and engaging with budget analysts who work closely with agency personnel.

Social Equity and Innovation staff provided communications between their office and the Budget and Management Office throughout 2023 and 2024. These discussions involved setting dates and formats for training city employees and budget analysts on the budget equity process, editing the annual budget manual to include equity information, and incorporating equity into agency budget presentations. Staff also provided us with the Budget and Management Office’s list of agency personnel who needed to attend budget equity training.

We reviewed Social Equity and Innovation’s budget equity and budget analyst trainings and found that both were comprehensive, including information like the office’s role in the budgeting process, the city’s equity goals, the impact of budget choices on equity, and aligning budgets with equity indicators and each agency’s “Racial Equity Action Plan.”

However, the Mayor’s Office of Social Equity and Innovation’s budgeting process policy does not explain how the office identifies new budget personnel who need training. The policy only says that office leaders “will identify members of leadership and staff who will participate in the budget process annually.”

As a result, we consider the recommendation partially implemented.

## Recommendation 2.6



**PARTIALLY  
IMPLEMENTED**

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

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

**Agency’s original target date for completion: Nov. 8, 2022**

### **SUMMARY OF AGENCY ACTION**

To implement this recommendation, the Mayor’s Office of Social Equity and Innovation developed policies and procedures outlining most of its responsibilities in the budget equity process. The office also further documented its responsibilities on training and guidance in the city’s annual budget manual.

**TRAINING CITY EMPLOYEES** – Social Equity and Innovation’s budget policy says its staff will support city agencies through equity trainings for Budget and Management Office staff, training and coaching for agency staff, providing a budget equity tool, and training on using the tool for budget change requests. The annual budget manual provided to city agencies goes into further detail by providing specific dates and times for trainings and office hours for agencies to ask questions to Social Equity and Innovation. The manual also provides links to access the budget equity guidance tool for agency change requests.

**FEEDBACK ON AGENCY BUDGET PROPOSALS** – The office’s budget policy provides high-level detail of what staff look for when reviewing agency budget proposals, such as recommendations that support agency and “citywide equity goals” and including equity into city operations and policy. The budget manual says that agencies may hear from the Mayor’s Office of Social Equity and Innovation following presentations to the city’s chief financial officer or after submitting change requests. The “Equity in the Budget Guidance” referenced in the manual also provides directions for agencies on how to answer equity change request questions.

**WHEN THE OFFICE IS INVOLVED** – While the office’s budget policy and the annual budget manual outline how and when Social Equity and Innovation will train and provide feedback to agencies, neither say when the office will begin working with the Budget and Management Office to document the

annual strategy in the budget manual or when and how Social Equity and Innovation identifies agency staff to participate in the budgeting process. The budget manual provides specific dates for all trainings and coaching sessions throughout the budgeting process. However, Social Equity and Innovation’s budget policy says only that the office “will identify members of leadership and staff who will participate in the budget process,” “will work with the Budget and Management Office to develop a strategy and plan for how [Social Equity and Innovation] will support the budget process each year,” and “the annual strategy and process will be documented and shared with city stakeholders.”

**HOW THE OFFICE WORKS WITH THE BUDGET AND MANAGEMENT OFFICE** – Again, Social Equity and Innovation’s budget policy lists the types of support provided for the budgeting process, including trainings, a budget equity tool, data indicators, and evaluations of budget requests. The budget manual expands on these types of support by providing training and coaching dates, when the office will provide feedback on budget proposals, and links to trainings and resources on budget equity.

From our review of the Mayor’s Office of Social Equity and Innovation’s budget policy and the budget manual, the office made progress in documenting policies and procedures for its roles and responsibilities in the budgeting process, including training city employees, providing feedback on agency budget proposals, and its involvement in the budget equity process. However, the policies did not specify when the office will engage the Budget and Management Office to document the annual budget strategy, and when or how the office will identify agency staff to participate in the budgeting process.

As a result, we consider this recommendation partially implemented.

**Recommendation 2.7**

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



**NOT  
IMPLEMENTED**

**Agency’s original target date for completion: Nov. 8, 2022**

**SUMMARY OF AGENCY ACTION**

The Mayor’s Office of Social Equity and Innovation has not evaluated staffing levels and resources for its role in the budget equity process. The office said it has not conducted a formal performance evaluation since the

new chief equity officer was appointed because they were working with the Budget and Management Office on budget reductions in response to the record number of migrants arriving in Denver and preparing for the 2025 budgeting process.

Office leaders said they hired deputy directors that are responsible for developing regular performance evaluations for agency staff, and the office said evaluation tools are being developed with an expected completion date of January 2025.

Because the Office of Social Equity and Innovation did not conduct a formal staffing and resource evaluation and is still in the process of addressing the recommendation, we consider this recommendation not implemented.

## FINDING 3 | The Mayor’s Office of Social Equity and Innovation does not have a plan to ensure clear, consistent communication with other city agencies

### RECOMMENDATION

### IMPLEMENTATION STATUS

3.1 Develop and document a communication plan

● PARTIALLY IMPLEMENTED

#### Recommendation 3.1

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

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

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



**PARTIALLY  
IMPLEMENTED**

**Agency’s original target date for completion: Oct. 14, 2022**

#### SUMMARY OF AGENCY ACTION

The Mayor’s Office of Social Equity and Innovation has made significant strides in developing and documenting a communication plan that ensures clear and consistent communication with city agencies and other stakeholders.

In our review, we examined several documents, including a communications policy, an 18-month communication plan presentation, and related training materials to assess whether the office had developed and documented a comprehensive communication plan.

We found that the office developed and documented a communication plan within its policies and procedures, which was approved on June 1, 2022. Additionally, we learned Social Equity and Innovation developed and implemented a new communication plan, which went into effect in November 2024.

The communication documentation office staff provided includes key elements that were outlined in the recommendation, such as:

- Frequency of communications with stakeholders.
- The office's communication roles and responsibilities.
- Identification of both internal and external stakeholders.
- Specific details regarding when, where, and how the office communicates.

The policy also includes a statement that the office will communicate citywide initiatives, ensuring alignment with citywide efforts. The communication policy is required to be reviewed and updated annually, or as needed.

Additionally, the plan is part of its operational manual, accessible to all employees, with new staff receiving it during onboarding. Both the communication policy and the new plan outline the office's commitment to collaborating with its various stakeholders, including office staff, equity, diversity, and inclusion teams, city employees, external partners, and the public. The new communication plan sets timelines and communication milestones.

Overall, we found the office has made progress in developing a communication plan to guide communication and interactions with city agencies and other stakeholders.

However, despite these improvements, we identified several gaps in the communication policy and the new communication plan. These include:

- The lack of documented details in the new plan regarding the notification of trainings to city employees and other stakeholders in a timely manner.
- The omission of specific communication roles and responsibilities for equity, diversity, and inclusion teams.
- Insufficient evidence that the new communication policy or plan was distributed and shared among stakeholders.

As a result, while the Mayor's Office of Social Equity and Innovation has made notable progress in fulfilling the recommendation to develop and document a communication plan, we consider this recommendation partially implemented.

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## Office of the Auditor

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