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Report number: A2015-009
AUDITOR’S REPORT

We have completed an audit of Police Operations – District Patrol. The purpose of the audit was to examine and review the Denver Police Department’s (DPD’s) policies and practices related to self-initiated actions to determine whether DPD is effective, consistent, and equitable when applying these policing tactics. We also reviewed DPD’s community policing efforts, including strategies and policies for initial implementation of a department-wide body worn camera program.

This performance audit is authorized pursuant to the City and County of Denver Charter, Article V, Part 2, Section 1, General Powers and Duties of Auditor, and was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit identified several opportunities to enhance the utilization of data to assess the effectiveness of community policing activities to inform strategic planning and enhance overall community policing efforts. Additionally, by collecting and analyzing demographic data on all self-initiated (Class 2) pedestrian and traffic contact, DPD can better ensure that officers are in compliance with their Biased-Policing Policy. These enhancements not only benefit DPD, but also the citizens and communities they serve.

We extend our appreciation to the Denver Police Department and the personnel who assisted and cooperated with us during the audit.

Denver Auditor’s Office

Timothy M. O’Brien, CPA
Auditor
Police Operations – District Patrol
January 2016

Scope
The audit assessed Denver Police Department (DPD) operations specific to self-initiated actions, community policing efforts, and implementation of a body worn camera program.

Background
DPD operates under a community-oriented policing philosophy, which encourages police departments to work collaboratively with communities they serve to address issues of concern, such as crime. DPD has established various goals for officers, which include spending 35 percent of available time conducting self-initiated—or Class 2—actions.

DPD has a Biased-Policing Policy that discourages practices of singling-out or treating individual differently on the basis of various characteristics or traits.

Purpose
The purpose of the audit was to examine and review DPD’s policies and practices related to Class 2 actions to determine whether DPD is effective, consistent, and fair in applying these police tactics. We also reviewed DPD’s community policing efforts, as well as strategies and policies to implement a department-wide body worn camera program.

Highlights
The Denver Police Department (DPD) has adopted a community-oriented policing philosophy, which is widely regarded among law enforcement professionals and researchers as an effective method of deterring crime and reducing fear. Police departments, through community policing tactics, seek to build trust and mutual respect between police and the communities they serve. However, we found that DPD does not have sufficient data to determine whether its community policing efforts are effective and equitable.

Effectiveness—DPD began incorporating community-oriented policing tactics into its operations in the 1980s and has steadily increased its efforts over time. Today, the department has a Community Relations Division, Community Resource Officers, and participates in youth outreach programs. Further, DPD has instituted team policing and redistricting to better carry out community policing activities. However, DPD does not have a comprehensive approach or mechanism by which to measure the effectiveness of these efforts.

To support state and local law enforcement agencies who are dedicated to the community policing philosophy, the Community Oriented Policing Service (COPS Office) created the Community Policing Self-Assessment Tool (CP-SAT), to help state and local law enforcement agencies with informing strategic planning, identifying training needs, promoting community policing initiatives to the public, and enhancing overall community policing efforts.

Equitability—DPD officers do not always capture demographic data when carrying out self-initiated—or Class 2—actions, unless the contact leads to a citation, arrest, or street check. Without capturing demographic data for all pedestrian and traffic stops, DPD cannot determine if or to what extent Class 2 actions are conducted fairly and effectively, and specifically, if officers are in compliance with the department’s Biased-Policing Policy.

Other Pertinent Information—DPD is implementing the use of body worn cameras (BWCs) into its policing strategy. Some studies show that BWCs reduce officer uses-of-force and citizen complaints against officers. In December 2014, DPD concluded a pilot BWC project that was carried out in DPD District 6 to test the use of BWCs on a small scale. The City entered into a five-year contract with Taser International for $6 million to provide BWC equipment and data storage. DPD’s draft BWC policy establishes a retention schedule for recordings captured through BWCs.

For a complete copy of this report, visit www.denvergov.org/auditor
Or contact the Auditor’s Office at 720.913.5000
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INTRODUCTION & BACKGROUND

Law Enforcement and Policing in America

Police departments throughout the United States are entrusted with enforcing the law and helping to maintain order in their communities. However, this responsibility often generates scrutiny and, at times, accusations of biased policing. Even the perception of biased policing can lead to distrust and tension between communities and law enforcement.\(^1\) To reduce the likelihood of biased policing by law enforcement, police departments around the country have taken steps to improve training, oversight, and accountability, as well as to provide appropriate protections for those who come into contact with law enforcement.

In late 2014, the U.S. Department of Justice (DOJ) announced the adoption of stricter policies to ensure that federal law enforcement personnel conduct their activities in an unbiased manner.\(^2\) The previous policy, established in 2003, barred profiling based on race and ethnicity. The updated policy was expanded to include the use of additional characteristics, including gender, gender identity, national origin, religion, and sexual orientation. As a result of DOJ’s policy update, the Office of the Independent Monitor (OIM) recommended that the Denver Police Department (DPD) also strengthen its policy related to biased policing, originally established in 2002.\(^3,4\) The updated DPD policy reaffirms the department’s commitment to unbiased policing and reemphasizes criteria relating to probable cause and reasonable suspicion.\(^5,6\)

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3. The Office of the Independent Monitor is the civilian oversight agency for the Police and Sheriff Departments for the City and County of Denver.

4. See Appendix A for the Denver Police Department’s Biased Policing Policy.

5. According to DPD’s Police Operations Manual, an officer “will not make a routine or spontaneous law enforcement decision i.e., ordinary traffic stop, pedestrian stops, other stops or detentions, or decisions to request consent to conduct searches based upon to any degree of a person’s race, ethnicity, national origin, age, religion, gender, gender identity, or sexual orientation unless these characteristics, traits, attributes, or statuses are contained in suspect description that have been provided to officers.”

6. The Fourth Amendment of the U.S. Constitution provides that “no warrants shall issue, but upon probable cause.” According to Law.com, *probable cause* is defined as sufficient reason based upon known facts to believe a crime has been committed or that certain property is connected with a crime. Probable cause must exist for a law enforcement officer to make an arrest without a warrant, search without a warrant, or seize property in the belief the items were evidence of a crime. The term *reasonable suspicion* is not derived from the Constitution but has been determined by the Supreme Court to describe a level of suspicion lower than probable cause.
To complement the implementation of stricter biased policing policies, police departments have been working to build more positive relationships with their communities. One popular method of doing so is through community policing, “a philosophy that promotes organizational strategies that support the systematic use of partnerships and problem-solving techniques to proactively address the immediate conditions that give rise to public safety issues such as crime, social disorder, and fear of crime.” Community policing has been championed by the federal Task Force on 21st Century Policing, which was created to identify best practices for promoting effective crime reduction while building public trust. President Obama created the task force in December 2014 to strengthen relationships between law enforcement and the communities they serve, especially in light of highly publicized events in Staten Island, New York; Ferguson, Missouri; and Cleveland, Ohio.\(^7\)

**Community Policing**

Although community policing is being used as a tool to address current concerns surrounding relationships between police and communities, it is not a new concept. In the 1980s, community policing emerged and grew to become the dominant influence on policing in the United States.\(^10\) Since the key tenet of community policing is unity between police and community, researchers in the field of criminal justice argue that patrol officers are integral to the success of community policing, positively influencing crime reduction, and a community’s perception of safety.\(^11\) However, as police interact with the public, serious challenges can arise, including accusations of biased policing and racial profiling.

---


\(^8\) These three events took place in 2014, leading to increased public discourse regarding racial profiling and police brutality. On July 17, 2014, Eric Garner died in Staten Island after a police officer put him in what has been described as a choke hold during an arrest. The medical examiner ruled Garner’s death a homicide, after which a grand jury decided not to indict the officer who performed the choke hold. The event led to public protests and rallies. On August 9, 2014, an eighteen-year-old black man, Michael Brown, was fatally shot by Darren Wilson, a white policeman with the Ferguson Police Department. The details of the incident, including that Brown was unarmed, led to protests, rioting, and vandalism. On November 22, 2014, a police officer fatally shot twelve-year-old Cleveland boy Tamir Rice, who was reported to police as pointing a gun at people in a recreation center. The gun was a replica and not a true firearm. Protests broke out after the shooting and again after the grand jury decision not to indict the officer who shot Brown.


Theoretical Foundations of Community Policing

Traditional police work was reactive in nature with a focus on process rather than outcomes. However, trends in research combined with a seminal work published by Herman Goldstein in 1987 shifted the landscape towards a focus on a more proactive policing approach. Goldstein emphasized the importance of redefining the relationship that police develop with the community, as well as the need to assure that police engage more directly in dealing with the substantive problems of concern to the communities they serve. This shift increased the scope of police work from not only answering calls for service but to assessing sources of physical and social disorder.

Community policing is derived in part from the broken-window theory. This theory asserts that disorder and crime are inextricably linked, a broken window being just one example of disorder. A broken window that remains unaddressed is a signal that no one cares. When social disorganization of this type increases, residents may perceive that crime is on the rise and they will modify their behavior accordingly by leaving home less and reducing their interactions with community members who they may perceive as a threat. Greater fear of crime and subsequent withdrawal from community involvement reduce the informal social control that ordinarily discourages disorderly behavior in a neighborhood. This reduction of community efficacy contributes to a downward spiral of more serious crime and further reduces community involvement. Conversely, when police work shifts to addressing the “broken windows” of the community, it can discourage greater offenses from being committed. The presence of officers in the community can elevate the level of public order and help people feel more secure.

As the community policing philosophy has evolved, it has integrated proactive and resourceful solution finding in the work of police. This move toward incorporating problem solving culminated in the federal Violent Crime Control and Law Enforcement Act of 1994. Along with other initiatives, the act provided federal funding for state and local law enforcement agencies, crime prevention programs, and construction of new state prisons. It authorized $8.8 billion over the course of six years to establish the Office of Community Oriented Policing Services (COPS Office) in the U.S. Department of Justice, and the creation of thirty-one regional community policing institutes allowed to add 100,000 police officers to communities.

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12 Herman Goldstein is Professor of Law Emeritus at the University of Wisconsin School of Law. His earliest writings explored the discretion exercised by the police, the policymaking role of police administrators, and the political accountability of the police. He has also written on the police function, police relationships with minorities, the control of police conduct, and police corruption.


The COPS Office characterizes community policing by three key components:\textsuperscript{17}

- **Organizational Transformation:** The alignment of organizational management, structure, personnel, and information systems to support community partnerships and proactive problem solving

- **Community Partnerships:** Collaborative partnership between a law enforcement agency and the individuals and organizations it serves to develop solutions to problems and increase trust in police

- **Problem Solving:** The process of engaging in the proactive and systematic examination of identified problems to develop and evaluate effective responses

**Direct Interaction between Police and Community Members**

Community policing, with its emphasis on partnerships and problem solving, necessitates increased interaction between police and community members. Increasing direct interactions through community policing tactics will shape citizens’ perceptions of outcomes related to safety and trust in law enforcement. These perceptions can be either positive or negative. Research provides evidence that when officers deal aggressively or appear to act arbitrarily, it can have a negative impact on community relations, reducing public confidence in and respect for officers.\textsuperscript{18}

Citizens’ attitudes toward police officers are often impacted by their own experiences when they witness, observe, or are directly part of an interaction with a police officer. One of the more frequent types of interactions occurs when a citizen is stopped and questioned by an officer during a patrol stop. Attitudes of citizens towards police are important for successful pursuit of a community policing philosophy because citizen cooperation with police is a crucial component when investigating crime and making arrests.\textsuperscript{19}

**Effectiveness of Community Policing**

Trust is a key component of the community policing philosophy, and it is essential to carrying out community partnerships and problem solving.\textsuperscript{20} Distrust of the police can undermine the legitimacy of law enforcement, and legitimacy is linked to the public’s belief about police and its willingness to recognize police authority.\textsuperscript{21} Research indicates that citizens who view the police as legitimate are more likely to comply with the law and help the police maintain order and reduce crime in their communities.\textsuperscript{22} Community policing thus presents


\textsuperscript{19} Lachman, LaVigne, and Matthews, p. 2.


\textsuperscript{22} Ibid.
officers with ample opportunities to interact with members of the public in a way that strengthens trust and perception of legitimacy.

The literature suggests that community-oriented tactics when combined with a targeted approach such as hot spot policing can be very effective in reducing crime, disorder, and the fear of being victimized. However, other studies have attempted to assess the effectiveness of community policing with inconclusive results. Two researchers who attempted to answer this question found that only 20 percent of studies showed crime reduction as a result of increases in community policing efforts. Fifty percent of studies could not demonstrate an effect on crime while 30 percent observed an increase in crime. The disparate nature of these results underscores the importance of the quality and nature of the interactions that take place under a community policing program. The way in which officers police their communities may be more important than their presence there.

Legal Considerations Surrounding the Self-Initiated Actions Associated with Community Policing—Class 2 or self-initiated police actions can foster some apprehension in the community if those actions are perceived as unfairly targeting certain members or sub-sets of the community, commonly referred to as profiling. Profiling refers to stops based on bias or prejudice against the perceived characteristics of race, ethnicity, age, sexual orientation, or even profiling a person because of body-art or clothing style choices.

Racial profiling is defined as the practice of targeting individuals based on their perceived race or ethnicity in the belief that certain minority groups are more likely to engage in unlawful behavior. Racial profiling has been reviewed in the context of several U.S. constitution amendments, including the 4th, which prohibits unreasonable search and seizure, and the equal protection guarantee of the 14th amendment. The Violent Crime Control and Law Enforcement Act of 1994 authorizes the DOJ to bring civil action for equitable and declaratory relief against any police agency engaged in unconstitutional patterns or practices. To bring civil action, the DOJ relies on statistical evidence of discriminatory enforcement patterns. The Omnibus Crime Control and Safe Streets Act of 1968 and Title VI of the 1964 Civil Rights Act also include clauses that can rescind any federal funds granted to local law enforcement agencies if racial profiling is proved.

In June 2015, DPD revised its Biased-Policing Policy and Criminal Intelligence Information to reaffirm the department’s commitment to protect civil rights and liberties by declaring that all

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23 Ibid., p. 4. Hot spot policing directs law enforcement efforts to areas where crime is concentrated.
26 Lachman, LaVigne, and Matthews, p. 5.
28 Ibid.
detentions or stops be supported by reasonable suspicion that a crime has or is about to be committed, and all arrests and searches are based on probable cause and/or reasonable suspicion. The anti-profiling policy extends to race, ethnicity, national origin, religion, age, gender, gender identity, or sexual orientation.

The Denver Police Department

The DPD is an agency within the City’s Department of Safety, overseen by the Executive Director of Safety. The Mission of DPD is to “operate a police agency with a focus on preventing crime in a respectful manner demonstrating that everyone matters.” 30 To accomplish this mission DPD has developed various strategies and tactics, which include the following:

- Align resources towards crime prevention and safety by implementing the strategic resource alignment plan. At its core, this plan assigns more officers to patrol districts by evaluating the role and function of each individual position within the department, allowing for the strategic deployment of resources.
- Enhance the relationship between youth and police officers by identifying and implementing methods for patrol officers to build positive and meaningful interactions with young people during their regular duty shift.
- Implement efficiencies and technologies throughout the Police Department to better align patrol activity to crime hot spots, including enhancing real-time crime information and predictive policing techniques. 31

DPD’s Districts and Precincts—DPD has divided the City into six police districts, which are further divided into precincts. Figure 1 shows DPD’s current district and precinct boundaries.

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DPD’s Operational Divisions—DPD consists of two primary bureaus under the Chief of Police: Administration, which is responsible for the overall management, resource allocation, and strategic direction of the department; and Operations, which implements and manages police services for the City. DPD provides services through several divisions, including but not limited to District Patrol, Operations Support, and Community Relations, all of which operate using a community policing philosophy.  

As shown in Table 1, as of 2012, DPD was the 26th largest police department in the nation with 1,388 total officers. Based on population, Denver has approximately 22 police officers for every 10,000 residents. This is fewer officers per resident compared to larger cities such as New York, Chicago, and Washington, D.C., but more officers per resident than other sizable cities such as San Diego and Las Vegas.

Source: Denver Police Department.
TABLE 1. Total Police Officers by City and Population, 2012

<table>
<thead>
<tr>
<th>#</th>
<th>City</th>
<th>Total Officers</th>
<th>Population</th>
<th>Officers Per 10,000 Residents</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>New York, NY</td>
<td>34,555</td>
<td>8,289,415</td>
<td>41.7</td>
</tr>
<tr>
<td>2</td>
<td>Chicago, IL</td>
<td>11,944</td>
<td>2,708,382</td>
<td>44.1</td>
</tr>
<tr>
<td>3</td>
<td>Los Angeles, CA</td>
<td>9,992</td>
<td>3,855,122</td>
<td>25.9</td>
</tr>
<tr>
<td>4</td>
<td>Philadelphia, PA</td>
<td>6,526</td>
<td>1,538,957</td>
<td>42.4</td>
</tr>
<tr>
<td>5</td>
<td>Houston, TX</td>
<td>5,318</td>
<td>2,177,273</td>
<td>24.4</td>
</tr>
<tr>
<td>26</td>
<td>Denver, CO</td>
<td>1,388*</td>
<td>628,545</td>
<td>22.1</td>
</tr>
</tbody>
</table>


For a complete listing of the top thirty U.S. cities based on number of police officers, see Appendix C.

DPD’s Budget—As shown in Table 2, over the past several years DPD’s budget and number of civilian and uniformed personnel has increased.


<table>
<thead>
<tr>
<th></th>
<th>2013 Actual</th>
<th>2014 Actual</th>
<th>2015 Appropriated</th>
<th>2016 Recommended</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Fund Budget</td>
<td>$194.3</td>
<td>$204.6</td>
<td>$213.6</td>
<td>$211.9</td>
</tr>
<tr>
<td>Civilian Personnel</td>
<td>248</td>
<td>280</td>
<td>311</td>
<td>329</td>
</tr>
<tr>
<td>Uniformed Personnel</td>
<td>1,426</td>
<td>1,434</td>
<td>1,439</td>
<td>1,453</td>
</tr>
</tbody>
</table>

Source: 2015 and 2016 City and County of Denver Mayor’s Budget.

DPD’s 2013 budget rose from approximately $194 million to approximately $214 million in 2015. The total authorized number of civilian personnel grew by sixty-three and uniformed personnel (officers) increased by thirteen during the same time period. According to DPD Command, the budgeted or authorized number of officers is not reflective of the number of available or in service officers due to a six to eight month lag time from academy and on-the-job training.

Although the recommended general fund budget allocated to DPD will be reduced in 2016, DPD expects to add eighteen civilian personnel and fourteen officers.

**Trends in Crime Committed in Denver**—Data indicates that, in Denver, serious crimes are occurring with less frequency while less serious crimes are occurring with greater frequency.\(^{34}\) Data from the Federal Bureau of Investigation’s (FBI’s) Uniform Crime Report (UCR) system, detailed in Table 3, reflects this trend.\(^{35}\) The UCR system classifies more serious offenses as Part I, including homicide, rape, robbery, aggravated assault, burglary, larceny, auto theft, and arson. Less serious offenses are classified as Part II; this category encompasses all other crimes.

<table>
<thead>
<tr>
<th>Crime Type (Summary)</th>
<th>Jan-Dec 2012</th>
<th>Jan-Dec 2013</th>
<th>Jan-Dec 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part I</td>
<td>27,924</td>
<td>26,942</td>
<td>25,084</td>
</tr>
<tr>
<td>Part II</td>
<td>13,555</td>
<td>16,543</td>
<td>18,533</td>
</tr>
<tr>
<td>Summary</td>
<td>41,479</td>
<td>43,485</td>
<td>43,617</td>
</tr>
</tbody>
</table>

**TABLE 3.** Number of Part I and II Offenses Committed in Denver, 2012 – 2014


The UCR data about Denver reflects a paradox occurring in America today, which is highlighted by the Task Force on 21st Century Policing in its final report:

> Over the past few decades, rates of both violent and property crime have dropped dramatically across the United States. However, some communities and segments of the population have not benefited from the decrease as much as others, and some not at all. Though law enforcement must concentrate their efforts in these neighborhoods to maintain public safety, sometimes those specific efforts arouse resentment in the neighborhoods the police are striving to protect.\(^{36}\)

The report asserts that police interventions in these neighborhoods can easily devolve into racial profiling and excessive use of force, further damaging the reputation and perception of police. Thus, the Task Force argues, community policing is essential to building the mutual trust and cooperation that are key to protecting these residents from the crime that today disproportionally affects their neighborhoods.

DPD has integrated many elements of community policing into its operations through self-initiated police contacts and community events, providing opportunities for positive interactions between law enforcement and the public.

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\(^{35}\) The Uniform Crime Report is a summary reporting system that tracks statistics submitted by police agencies across the nation.

Classification of DPD Officer Activities

Not all of the duties carried out by DPD officers are directly related to community policing; much of an officer’s time is spent responding to 911 calls and performing administrative duties. The work performed by DPD officers is classified into three categories: Class 1, Class 2, and Class 3. DPD patrol officers are required to maintain written Activity Logs of all activities performed during each shift by class type. The log summarizes and categorizes all time and activity spent during a shift. According to DPD command, these logs should be reviewed and approved daily by an officer’s direct supervisor and by District Command as needed. The information collected in the logs are maintained in a manual filing system for future reference.

Class 1 Actions—A Class 1 action occurs when a DPD officer responds to a citizen emergency as dispatched through Denver’s 911 call center. Calls for service range in severity from an assault or shooting in progress, to noise complaints, to a citizen requesting that an officer check on well-being of another person. Figure 2 shows the work flow and parties involved in a Class 1 action.

Class 2 Actions—A Class 2 action is a self-initiated action proactive in nature and characteristic of community policing activities. Examples of Class 2 actions include traffic and pedestrian stops to issue warnings or tickets, stopping an individual fitting a BOLO (Be-On-the-Look Out) description, as well as other simple community contacts, like visiting business owners or talking to citizens individually. One intent of Class 2 actions is to reduce crime by building trust and open communication with community members in order to address issues and concerns collaboratively. DPD officers are encouraged to get out of their patrol cars for these actions to promote positive engagement with community members. Class 2 actions could result in no

FIGURE 2. Denver Police Department Class 1 Actions Flow Chart

Source: Developed by Audit Team.

The terms Class 1 and Class 2 are derived from the codes used in DPD’s Computer Assisted Dispatch system (CAD). Class 2 stops are synonymous with self-initiated stops in other jurisdictions.

See Appendix B for Activity Log sample.


Street checks are documented by officers in the Records Management System for actions such as self-initiated suspicious activity stops, CIT team mental holds, and contacts made during illegal camping enforcement, but also used as a catchall for other actions including gathering information for towing of vehicles. Demographic data fields are not consistently used and data is not consistently collected.

action, a verbal warning, documented street check, a citation, detention, or, on occasion, arrest. Figure 3 shows the work flow and parties involved in a Class 2 action.

FIGURE 3. Denver Police Department Class 2 Actions Flow Chart

Class 2 Actions

Source: Developed by Audit Team.

Class 3 Actions—Administrative activities are classified as Class 3 actions, including testifying in court, reviewing and responding to email, attending meetings, and receiving training.

DPD’s Community Policing Efforts

According to DPD command, the department has embraced the community policing philosophy since the 1980s. Strategies designed to enhance community policing efforts have continuously been evolving since that time. Each DPD district is encouraged to be creative and find individualized approaches to interacting with communities based on their unique characteristics and needs. For example, DPD command stated that Community Resource Officer (CRO) positions have been in place for several decades.

- **Community Resource Officers**—The Denver Community Resource Officer (CRO) position is intended to free up other officers by providing assistance to the community on issues related to neighbor disputes, public nuisances, zoning issues, fraud and crime prevention,
and other neighborhood concerns. CROs assigned to a district are responsible for attending neighborhood organization meetings to discuss and address crime preventive ideas and other community issues and concerns. These officers are responsible for building positive relationships with community members and providing an easy resource for citizens to reach out to, which is essential to the community policing philosophy. Further, since each police district has its own set of unique community issues and needs, each CRO has the flexibility to develop and address community issues that are specific to their assigned district.

Some department-wide policy changes were made with the community policing concept in mind, including the implementation of team policing and redistricting.42

- **Team Policing**—Implemented in January 2013, team policing shifted officers from working independently to working with a consistent team of officers and a specific supervisor on a set schedule. Team policing is designed to assign responsibility for a certain geographic area to a team of police officers who learn the neighborhood, get to know the citizens and specific issues affecting the community, and build a solid working relationship between patrol officers and their supervisors.

- **Redistricting**—Implemented in July 2013, redistricting impacted the size of all DPD districts and precincts. District square mile changes ranged from a net loss of six miles to a net gain of four miles, and the number of precincts Citywide decreased from seventy-eight to thirty-two. Some intentions behind re-districting were to better align officer workload, crime patterns, geographical obstacles, population changes, and to allow for greater coverage by available officers with the team policing and community policing concepts in mind.

DPD also formed the Community Relations Division in 2014 and more recently, in conjunction with the Office of the Independent Monitor (OIM), helped develop and participated in a youth outreach program called “Bridging the Gap: Kids and Cops.” Each of these initiatives are intended to build positive relationships with citizens and are inclusive of the community policing philosophy.

- **Community Relations Division**—The goal of the Community Relations Division is to increase transparency, build positive relationships with the community, and create an open line of communication with citizens. The Division has three sections responsible for engaging the community: Special Events, Media Relations, and Volunteers in Police Service. These sections are charged with the following responsibilities:43
  
  - **Special Events Section:** Increases community involvement in order to promote positive interactions between citizens of Denver and the Denver Police Department, through expositions, public safety events, the Police Activities League, Citizen Academies, and charity events.
  
  - **Media Relations Section:** Creates transparency and fosters information sharing through social media efforts. Twitter and Facebook followers receive daily positive stories of DPD officers, breaking news, warnings and requests for assistance on

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wanted individuals, photos of DPD officers throughout time, stories related to the history of DPD, behind-the-scene videos of officers working in their assignments, and examples of officers going above and beyond the call of duty and making a positive impact on the community.

- **Volunteers in Police Service Section:** Organizes and promotes volunteer opportunities for community members, with the goal of building a positive relationship and experience with community members.

According to the Denver Police Department’s 2014 Annual Report, the Special Events section hosted a Safety Expo that attracted more than 2,000 citizens, which was a 400 percent increase in attendance from previous years. Also, the Media Relations section has attracted over 85,000 followers on Twitter and Facebook combined. These activities are intended to build a positive two-way relationship between various Denver communities and DPD.

- **Youth Outreach Project**—In September 2014, OIM in partnership with DPD developed a youth outreach project, previously mentioned, called “Bridging the Gap: Kids and Cops” to proactively address the relationship between youth and law enforcement, which was funded by a Colorado Justice Assistance Grant. The first forum took place in August 2015.

According to information from the OIM, the project was developed, in part, to address the disconnect between citizens, particularly youth, and law enforcement officers across the country. The OIM has observed a lack of trust among some youth, which means youth are often scared of and unwilling to cooperate with police, causing many police contacts to escalate unnecessarily, which may lead to arrests. The Department of Justice has emphasized in a report about youth and police officer interaction in general, how “over time minor communication issues between urban youth and police can grow into serious levels of distrust, fear, and even hostility on the part of both some police and some urban youth. If these feelings of alienation are left unattended – and in many cases they have been – they contribute to decline in the quality of life in many urban areas across the Nation.”

In Denver, the OIM has seen an increase in concerns from some Denver youth and their family members about minor contacts with police that escalated unnecessarily. The common theme of these complaints is that communication difficulties exist between youth and officers. The OIM continued that some officers may not be aware how the lack of emotional maturity shapes the way some teens act when in contact with the police. Moreover, the OIM also noted a need for increased knowledge about rights or responsibilities for affected youth during a law enforcement contact. The “Bridging the Gap: Kids and Cops” Project seeks to proactively improve relationships between youth and law enforcement in Denver by educating youth on their rights and responsibilities during a law enforcement contact, and educating officers on key aspects of adolescent development and de-escalation techniques when contacting youth.

Some activities include discussions surrounding youth rights and responsibilities and shed light on implicit biases among youth and police officers. During some of these activities, individuals are divided into various groups and participate in active sharing of

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experiences, which has helped create tips benefiting both youth and officers when interacting with each other. Tips developed by youth and officers from the outreach project to assist both groups when interacting, included:

**Youth Tips**
- Don’t come up from behind; always approach from the front
- Keep hands visible
- Wait until things are calmed down to ask questions
- Be calm and stay calm
- Be respectful

**Officer Tips**
- Respect youth
- Understand youths’ cultures
- Don’t take youths’ attitudes personally
- Stay calm
- Don’t be too quick to judge
- Communicate openly as much as possible for the situation

The OIM in collaboration with DPD intend to continue this project with the intent to hold a total of eleven forums in 2016; training 500 youth ages thirteen through eighteen, forty officers, forty community facilitators, and forty youth facilitators.

**DPD’s Officer Performance Goals**

DPD has established various performance goals that complement the Department’s emphasis on community policing. These goals recommend that patrol officers spend 35 percent of their time responding to dispatched calls (Class 1 actions), 35 percent of their time conducting proactive activities (Class 2 actions), and the remaining 30 percent of their time on administrative items (Class 3 actions). According to DPD’s 2014 Strategic Plan, “productivity is captured by dividing all Class 2 actions by the time remaining (based on actual hours in a car recorded in the CAD system) after responding to Class 1 calls from citizens, Class 3 administrative actions, and out of service codes.”

As reported in our June 2014 audit of police response time, the percentage of time that DPD officers spend carrying out Class 1 actions has increased since 2011. By December 2013, patrol officers were spending approximately 44 percent of their time responding to 911 calls, and only 26 percent on Class 2 actions. In addition to supporting community policing, Class 2 actions are intended to reduce the number of 911 calls for service. Theoretically, as citizens are presented with more opportunities to address issues directly with officers, there is less need to call 911 for assistance with non-emergency issues. For example, officers hold regular community meetings with the management and residents of large apartment buildings downtown about DPD’s efforts with Denver’s homeless population. By educating residents about services, including security patrol units and DPD’s non-emergency telephone number, building residents will be less likely to call 911 to report an issue relating to a homeless individual, such as trespassing.

45 Denver Police Department, Data Analytics Unit, Performance Based Staffing Presentation.
Body Worn Cameras

In addition to DPD’s community policing efforts, DPD recently decided to implement the use of Body Worn Cameras (BWCs). Nationally, BWCs are being used as a means of documenting interactions between police and citizens in the wake of national cases alleging citizen profiling and officer abuse, “which have sparked a national debate on criminal justice, police-community relations, trust in law enforcement officers, and the expanding role of technology.”

According to DPD, BWCs will be used in Denver to provide a record of an officer’s encounters with the public, both to support criminal allegations and refute potential use-of-force complaints. The department expects the incorporation of BWCs to lead to a decrease in complaints and uses of force, as well as to improve transparency.

Denver’s Chief of Police decided in 2014 to incorporate the use of BWCs into DPD’s policing strategy, with deployment beginning in early 2016. The expectation is that by the end of 2016, 800 on-duty officers will be outfitted with BWCs. The Other Pertinent Information section within this report discusses the implementation of BWCs in Denver in greater detail and explores how the strategy relates to community policing.

50 Ibid.
SCOPE

The audit assessed Denver Police Department (DPD) operations specific to self-initiated actions, community policing efforts, and implementation of a body worn camera program.

OBJECTIVE

The objective of the audit was to examine and review DPD’s policies and practices related to self-initiated actions to determine whether DPD is effective, consistent, and equitable when applying these police tactics. We also reviewed the Department’s community policing efforts, including strategies and policies for initial implementation and roll-out of a department-wide body worn camera program.

METHODOLOGY

The methodologies used in this audit to assess risks and to assist with developing and testing the audit objective included the following:

- Reviewing the University of Colorado Denver’s 1st and 2nd Annual Reports: Denver Police Department Contact Card Data Analysis, completed October 2002 and March 2004
- Reviewing DPD’s 2014 Strategic Plan
- Reviewing national research regarding police operations and law enforcement and best practices, studies, and standards from organizations including but not limited to:
  - Police Executive Research Forum (PERF)
  - Police Assessment Resource Center (PARC)
  - National Institute of Justice (NIJ)
  - National Association of Chiefs of Police (NACP)
  - U.S. Department of Justice (DOJ)
  - Office of Community Oriented Policing Services (COPS Office)
- Assessing DPD’s community-oriented policing practices
- Determining which legal and regulatory requirements that impacted DPD’s police operations, resulting in a review of DPD’s Collective Bargaining Agreement effective for 2013 to 2014; and identifying which sections related to self-initiated actions from DPD’s current Police Operations Manual
- Reviewing financial information and performance measures defined for DPD contained within the City’s 2015 Budget Book and DPD’s 2014 Annual Report
- Meeting with DPD representatives and attending community outreach efforts intended to implement the Department’s community policing strategies
• Attending City Council, Citizen Oversight Board, and DPD Command Operation Review and Evaluation (CORE) meetings

• Conducting internal and external meetings with stakeholders and representatives, such as the Executive and Deputy Directors of the Department of Safety, DPD Command, Community Resource Officers, Peak Performance, the Denver Office of the Independent Monitor (OIM), the Colorado Latino Forum, and the American Civil Liberties Union (ACLU) of Colorado

• Interviewing personnel from the City of Chicago’s Office of the Inspector General

• Interviewing the President of the Center for Policing Equity at the University of California Los Angeles

• Attending a University of Denver public forum discussing conflicts in racial tensions and local law enforcement, and Broken Windows theory

• Reviewing national media coverage of racial profiling and biased policing

• Assessing business practices related to body worn cameras

• Conducting ride-a-longs and direct observations covering a variety of shifts and officers assigned to DPD Districts 1, 2, 4, 5, and 6

• Assessing relationships between self-initiated actions and available data provided by DPD extracted from the following systems for the following associated time periods:
  ○ Computer Aided Dispatch, January 2009 through June 2015
  ○ TeleStaff time tracking system, 2009 through 2014
  ○ Early Intervention Information System, 2009 through 2014
  ○ Versadex System, 2012 through 2014

• Analyzing 911 and Self-Initiated Action data from the Computer Aided Dispatch system, which included analyzing data from DPD’s Early Intervention Information System obtained during our previous audit of the department’s TeleStaff timekeeping system

• We engaged RBI Strategies & Research to conduct an independent, statistically valid survey to document the perspectives of Denver citizens on community policing and self-initiated actions. RBI Strategies used a listed sample to randomly sample individuals living in the City and County of Denver. Respondents were screened to ensure that they were residents of Denver over the age of eighteen and that they had no familial connection to law enforcement. Target demographics for the sample were set based on the 2013 American Community Survey Census data for Denver. Thirty-five percent of respondents were reached on cell phones. With a 400 person sample size, the survey was conducted over a five-day period from June 30, 2015 to July 5, 2015. The margin of error was +/- 4.9% at a 95 percent confidence level. Survey results are highlighted throughout the audit report where relevant.

51 See http://www.rbistrategies.com/ for additional information about RBI Strategies & Research.
FINDING

Limited Data Impacts the Denver Police Department’s Ability to Determine Whether Community Policing Activities Are Effective and Equitable

The Denver Police Department (DPD) has adopted a community-oriented policing philosophy, which is widely regarded among law enforcement professionals and researchers as an effective method of deterring crime and reducing fear. Police departments, through community policing tactics, seek to build trust and mutual respect between police and the communities they serve. However, we found that DPD does not have a system in place to determine the effectiveness of its various community policing efforts.

DPD command has stated that the department is data-driven and continuously looking for ways to improve and incorporate the most advanced law enforcement techniques to enhance service and prevent crime.52 DPD also has a dedicated Data Analysis Unit that works to identify crime trends and helps department leadership develop strategic crime prevention strategies. Despite these capabilities, DPD does not have a comprehensive approach for measuring the effectiveness of DPD’s community policing efforts. Although DPD does use survey data about how the public perceives public safety in Denver and gathers limited quantitative data about some of its community outreach efforts, this data is not sufficient to draw broad conclusions about the effectiveness of its community policing initiatives.

We also found that DPD is not collecting sufficient data to determine whether officers are acting in compliance with the department’s Biased Policing Policy, which prohibits officers from taking law enforcement actions based solely on race, gender, and other demographic characteristics. DPD officers do capture demographic data when a self-initiated action leads to a citation or an arrest and for some street checks. However, without capturing demographic data for all pedestrian and traffic stops, regardless of outcome, DPD cannot determine if or to what extent these Class 2 actions are conducted fairly and, specifically, if racial profiling is occurring.

The Denver Police Department Lacks a Comprehensive Approach for Measuring the Effectiveness of its Community Policing Efforts

Although DPD is committed to community-oriented policing, DPD does not have a comprehensive approach or mechanism by which to measure the effectiveness of its various community-oriented policing and outreach activities. Measuring community policing efforts is challenging; however, there are tools available to help law enforcement agencies measure their progress in community policing. DPD could use such a tool to measure the awareness of the community regarding community policing and the effectiveness of specific community outreach efforts.

DPD Is Committed to Community-Oriented Policing

DPD began adopting community-oriented policing tactics in the 1980s and has steadily increased its efforts over time. It is clear that DPD is committed to the philosophy of community

policing. Today, the department has a Community Relations Division that puts on special events for the community, carries out strategic media relations activities, and seeks out volunteer opportunities. Community Resource Officers provide community assistance on concerns specific to the neighborhoods they serve and strive to build positive relationships in the process. To proactively address the deteriorating relationship between law enforcement and youth, DPD in conjunction with the OIM established a youth outreach project. In 2013, the department instituted team policing to better understand neighborhoods, citizens, and their issues, as well as redistricting to better align officer workload, crime patterns, geographic obstacles, and population changes. Redistricting also allows for greater coverage through team policing. Finally, DPD officers have a goal of spending 35 percent of their time carrying out Class 2 actions, which is in line with best practices. These outreach activities are commendable and reflective of the community policing philosophy. However, DPD does not have a specific mechanism to measure and determine the effectiveness of these activities. Therefore, DPD cannot assess with certainty whether the overall community policing effort is working.

Although DPD has not established a comprehensive approach for assessing effectiveness of community policing, the department does collect and use some relevant data. First, the department looks at information from the National Citizen Survey (NCS) regarding how the community perceives public safety. The NCS is administered by a third party and captures Denver residents’ opinions regarding specific areas of community, including safety. This includes assessing how safe respondents feel in their neighborhoods, how safe they feel downtown and in commercial areas, and overall feelings of safety. In addition, the NCS provides information on how satisfied citizens are with crime prevention, police service, and traffic enforcement.

Second, DPD gathers quantitative data about some of its community outreach events. Specifically, DPD assesses its level of community engagement by tracking how many neighborhood meetings DPD officers attend and how many crime prevention presentations DPD officers make. This information is communicated in its strategic plan, broken out by DPD district and quarterly activity. Attendance at neighborhood meetings allows officers and command staff to become aware of local concerns and issues, and allows the department to provide community safety awareness. Further, DPD develops targeted crime prevention presentations in response to community needs, requests, specific crime concerns, or events.

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53 The National Citizen Survey is a collaborative effort between National Research Center, Inc., the National League of Cities, and the International City/County Management Association. The NCS is a tool that helps local governments focus on understanding what the public needs, producing results that benefit the public, and building a performance-based culture. The survey results may be used by staff, elected officials and other stakeholders for community planning and resource allocation, program improvement, policy making, and tracking changes in residents’ opinions about government performance. The NCS captures residents’ opinions within the three pillars of a community (Community Characteristics, Governance and Participation) across eight central facets of community (Safety, Mobility, Natural Environment, Built Environment, Economy, Recreation and Wellness, Education and Enrichment and Community Engagement). This report discusses trends over time, comparing the ratings to previous years’ results.

57 Among other social media outlets, District Commanders utilize Nextdoor.com, a private social network, as a social media outlet to provide information to the public, such as district events and crime updates. Citizens can join Nextdoor.com as a user at https://cbd.nextdoor.com/login/.
The Auditor's Office engaged RBI Strategies & Research to conduct an independent survey of Denver citizens' perspectives of DPD's community policing efforts and self-initiated actions. The RBI survey results, shown in detail in Figure 4, revealed the following with regard to respondents' feelings of favorability towards community policing and DPD:

- Community Policing:
  - 18 percent of respondents have a “Very Favorable” feeling
  - 36 percent of respondents have a “Somewhat Favorable” feeling
  - 11 percent of respondents have a “Somewhat Unfavorable” feeling
  - 6 percent of respondents have a “Very Unfavorable” feeling

- Denver Police Department:
  - 19 percent of respondents have a “Very Favorable” feeling
  - 39 percent of respondents have a “Somewhat Favorable” feeling
  - 18 percent of respondents have an “Unfavorable” feeling
  - 7 percent of respondents have a “Very Unfavorable” feeling

**FIGURE 4.** RBI Survey Results – Familiarity and Favorability of Community Policing and DPD, 2015

This survey answer indicates that more than 50 percent of Denver citizens have favorable or somewhat favorable feelings towards DPD and its community policing activities. However, these responses do not indicate which activities are driving those perceptions. As for what may be driving unfavorable feelings towards DPD and community policing, it appears that a respondent’s previous interactions with police may play a role. Among those respondents who had been stopped by police more than once in the past five years, favorability was significantly lower.
lower for both DPD and community policing. For example, only 6 percent of the total sample indicated a “Very Unfavorable” feeling towards DPD, while 24 percent of respondents who had been stopped more than once indicated a “Very Unfavorable” feeling towards DPD. The results were similar for feelings towards community policing. Only 6 percent of the total sample indicated a “Very Unfavorable” feeling towards community policing, while 18 percent of respondents who had been stopped more than once indicated a “Very Unfavorable” feeling towards community policing. These discrepancies appear to indicate that, when an individual is stopped by DPD, his or her perception of DPD becomes less positive.

Criminal justice research emphasizes the importance of the interactions between officers and the community, since a negative interaction can reduce the effectiveness of community policing efforts. Therefore, it is important that DPD understand how its officers' interactions with the public may be affecting the department’s implementation of community policing tactics. By asking the type of questions that we asked through our survey, DPD could identify areas for improvement. Accordingly, DPD would benefit from a formal method by which to determine how effective the department’s community policing efforts are. One tool that DPD could consider using for this purpose is the Community Policing Self-Assessment Tool.

The Community Policing Self-Assessment Tool (CP-SAT) Was Designed To Assist In Measuring the Three Primary Components of Community Policing

To support state and local law enforcement agencies who are recipients of the COPS Hiring Program (CHP) grant and who are dedicated to the community policing philosophy, the COPS Office assisted in developing the Community Policing Self-Assessment Tool (CP-SAT), in conjunction with ICF International and the Police Executive Research Forum. This online survey platform assists with addressing the complexity of determining the status of community policing implementation, and provides a measurement system for agencies to track their community policing efforts over time. Currently, the CP-SAT is a mandatory requirement for all CHP grantees. DPD is not a grant recipient, however, we believe that the CP-SAT or a similar tool will benefit the department in its assessment of community policing efforts dedicated to community policing. Currently, COPS is exploring options for non-grantee agencies to administer the CP-SAT. Table 4 lists three Colorado Police Departments that have been awarded the CHP grant.

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58 Figure 4 shows that 7 percent, rather than 6 percent, indicated “Very Unfavorable” feelings towards DPD. This was due to rounding.
The CP-SAT focuses specifically on the three primary components of community policing: organizational transformation, community partnerships, and problem solving. Surveys are tailored for each individual role and level of responsibility surrounding community policing, including command, officers, civilian personnel, and community partners.  

Information obtained from the survey can assist with establishing a baseline for community policing strategies, identify areas that need strengthening, and assist with assessing the overall effectiveness of various community policing efforts. Additionally, the results can serve as a communication tool for various stakeholders and inform each group about what types of activities comprised effective community policing at their level or role within the organization.

Additional benefits of the CP-SAT include:

1. Agencies can measure the extent to which community policing has been implemented in various units and ranks within their agency
2. Agencies will be able to enhance community policing efforts through the identification of community policing strengths and areas for improvement
3. Agencies can utilize results to help support strategic planning, identify a list of training needs, and promote the agency’s community policing successes to the public and governing officials
4. Agencies can maintain and reference summary reports that summarize their results and progress over time

We recognize that DPD measures and reports various crime and arrest statistics, including citizen satisfactions from the NCS Survey about how citizens’ perceive public safety. However, these data analyses do not assess the effectiveness of specific activities dedicated to community policing.

Therefore, DPD should reach out to COPS to explore options on how to utilize CP-SAT or a similar tool. The results of the assessment should be used to inform strategic planning, identify training needs, and promote community policing successes to the public and governing officials.
needs, promote DPD’s community policing initiatives to the public, and enhance overall community policing efforts.

The Denver Police Department Does Not Collect Sufficient Demographic Data on Class 2 Actions to Demonstrate that Officers Are Not Engaging in Racial Profiling

DPD command has stated that the department is a data-driven agency that focuses on crime prevention and crime reduction through various strategies and tactics.\(^\text{64}\) DPD also takes pride in providing excellent service to citizens by identifying innovative ways to enhance service and prevent crime, by incorporating advanced law enforcement techniques.\(^\text{65}\) However, DPD does not collect demographic data for all police contacts. This makes it difficult to demonstrate that the department’s Biased-Policing Policy is effectively implemented and to determine whether or not officers are engaging in racial profiling.

DPD has a robust Data Analysis Unit with the technical ability to conduct sophisticated data analysis. Through this unit, DPD is continuously exploring innovative ways to utilize data to help reduce crime. For example, in 2014 DPD piloted the Data-Driven Approaches to Crime and Traffic Safety (DDACTS) program, which is currently being utilized Citywide. DDACTS correlates several variables and allows DPD to focus limited resources on reducing crime. DDACTS integrates location-based crime and traffic accident data to determine the most effective methods for deploying law enforcement and other resources. Data is also utilized during weekly DPD Command Operation Review and Evaluation (CORE) meetings to analyze issues or “hot-spots” in various police districts.\(^\text{66}\) For example, data is used to highlight specific types of crime and clusters of crime locations and facilitates discussions on how to address these issues.

Despite demonstrated proficiency with the use of data to drive strategy and measure policy and program effectiveness, DPD officers are collecting limited demographic data during self-initiated actions; data is collected for Class 2 actions only when the action results in an arrest or citation and for some street checks. As a result, the department cannot demonstrate that Class 2 actions are conducted in a consistent manner and are deployed without bias. Further, command personnel have empowered officers to determine what type of self-initiated actions should be taken and when such actions should occur, as well as providing officers with the option to use their professional judgment to determine when information and data should be collected during these contacts. The number of Class 2 actions that DPD officers will carry out in coming years appears poised to continue trending upwards as the Department increases its effective strength; additional officers will yield an overall greater number of Class 2 actions since the department uses percent of time spent on Class 2 actions as a performance measure for


\(^\text{66}\) CORE meetings are designed to enhance accountability and ownership of areas of responsibilities. Crime patterns and solutions as well as community outreach efforts are discussed in open forum. The statistics provided on a weekly basis identify crime changes and officer activity geographically. Media, elected officials, members of various city agencies, and the public have attended.
officers. Volume and priority of self-initiated stops underscore the importance of determining how this common law enforcement tool is being deployed in the community.

**DPD Has a Biased-Policing Policy but Does Not Measure Officer Compliance**

During our review of DPD’s Biased-Policing Policy, we learned that DPD updated this policy in June 2015 based on the recommendation made by the Office of the Independent Monitor (OIM) to include stronger profiling prohibitions. The previous policy prohibited profiling if it was the sole basis for an officer making an enforcement decision. The OIM’s recommendation reflects new guidance from the U.S. Department of Justice, which prohibits federal law enforcement officers from using race, ethnicity, gender, national origin, religion, sexual orientation, or gender identity in making routine or spontaneous law enforcement decisions, such as traffic stops.

The policy update emphasized DPD’s commitment to protecting civil rights and liberties by declaring that all detentions or stops be supported by reasonable suspicion that a crime has been or is about to be committed, and all arrests and searches should be based on probable cause and/or reasonable suspicion. The anti-profiling policy extends to race, ethnicity, national origin, religion, age, gender, gender identity, and sexual orientation. However, there is no language that requires the department to conduct a continuous review or assessment of the demographic data collected to ensure that officers are adhering to the policy and not engaging in racial profiling.

**DPD Collected Demographic Data from 2001 to 2003** - At one time, DPD did collect demographic data regarding traffic stops based on a state mandate that has since been repealed. The law that required the data collection took effect in June 2001 and mandated that the Colorado State Patrol and any law enforcement agency that serves the City and County of Denver collect and maintain specific information regarding each traffic stop, including demographic data about race, ethnicity, age, and gender. The same bill also prohibited all peace officers throughout the state from engaging in profiling. As a result of the legislation, DPD updated its policy and procedures to begin collecting data regarding the race and ethnicity of individuals contacted for all traffic and pedestrian stops beginning June 1, 2001. The data-collection mandate was only in effect through the end of 2003, and DPD subsequently discontinued collecting the demographic data. Appendix E shows the DPD Contact Card that was used by officers when the mandate was in effect.

The University of Colorado at Denver (UCD) conducted analyses on traffic and pedestrian stops carried out by DPD officers from 2001 through 2003 using DPD data. We analyzed the results to provide context for potential issues that might be relevant during the department’s current deployment and continued growth of self-initiated actions. Although DPD command asserts that the analyses did not identify any significant issues with the department’s deployment of Class 2 actions, the reports did recommend that demographic data continue to be collected beyond

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70 DPD used a Contact Card to collect data mandated by §24-31-309, C.R.S., included in Appendix E.
the constraints of the time-limited state requirements, especially when deploying a community policing philosophy. One of the analyses emphasized the importance of collecting this data because data-based decisions may be used by the department to “generate positive problem solving collaborations based on issues identified through dialog about the data” as the data has “the potential to be a powerful tool in generating discussion between the police and the community.” Based on this reasoning as well as in an effort to assess DPD’s adherence to its Biased Policing Policy, DPD should update its Biased-Policing Policy to include at least an annual assessment of the demographic data collected in order to inform DPD command about compliance with the policy.

Survey Responses Indicate Potential Perceptions of Biased Policing

Although UCDs analysis did not indicate any problems with profiling based on the June 2001 through 2003 data, responses to our survey questions regarding community perceptions of DPD indicate that there may be areas of concern. Survey administrators asked respondents whether specific words or phrases apply to DPD. The following responses indicate a potential perception of biased policing:

- 36 percent responded that the phrase *unfairly targets young men of color* “Strongly Applies” to DPD
- 33 percent responded that the phrase *treats people of all races and ethnicities equally* “Does Not Apply at All” to DPD
- 30 percent responded that the phrase *unfairly targets minorities* “Strongly Applies” to DPD
- 26 percent responded that the phrase *treats people equally* “Does Not Apply at All” to DPD. This data is provided in detail in Figure 5.

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71 2nd Annual Report Denver Police Department Contact Card Data Analysis.
The survey also sought to determine the degree to which respondents believe that racial profiling, excessive use of force, and harassment of citizens are a problem in Denver. A majority of respondents indicated that all three of these issues are at least somewhat of a problem in Denver.

- 34 percent indicated that **excessive force** is “A Big Problem”, and 37 percent believe it is “A Problem, but not a Big One”
- 31 percent indicated that **racial profiling** is “A Big Problem”, and 36 percent believe it is “A Problem, but not a Big One”
- 20 percent indicated that **harassment of citizens** is “A Big Problem”, and 39 percent believe it is “A Problem, but not a Big One”

The findings regarding this survey question are detailed in Figure 6.
These issues also appear to have greater significance to some segments of the population than others. Both minorities and those who have been stopped by police more than once in the last five years indicated that these issues are “big problems” more frequently than the general sample. Criminal justice research emphasizes that positive interactions between police officers and communities are a crucial element in determining the success of community policing efforts.

In addition to perceptions of DPD as assessed by our survey, we also considered data from DPD’s June 2001 through 2003 data. From June 2001 through May 2003, DPD officers conducted over 354,000 self-initiated actions, which equates to nearly 15,000 stops per month. Of the more than 354,000 self-initiated actions made over two years, nearly 20 percent (71,000) were pedestrian-related actions as opposed to traffic-related actions. Of the nearly 71,000 pedestrian actions made, more than 90 percent, or nearly 65,000 pedestrian actions, were initiated by an officer based on observation of the individual rather than from information received from other sources, such as DPD 911 dispatch, another officer, roll call, or a Be-On-The-Look-Out bulletin.

Our analysis of the figures reported in the 2001 and 2003 reports, is inconclusive on whether there was a disparity between the demographic make-up of the City and the demographic make-up of pedestrians stopped by DPD.\textsuperscript{72} Figure 7 provides data on the City’s population and Class 2 actions performed from 2001 through 2003.

\textsuperscript{72} Pedestrian stops of citizens are used as the reference rather than all pedestrian stops as the population of the City increases by nearly 150,000 to 700,000 during the day and the daytime demographic profile of the City is not the same as the resident or citizen population of the City. Pedestrian stops are also the focus of this analysis due to the more sensitive nature of pedestrian stops compared to traffic stops.
As shown in Figure 7, Whites made up between 52 and 53 percent of the City’s population but accounted for only 28 percent of pedestrian stops. In comparison, Blacks made up 10 to 11 percent of the City’s population but accounted for 37 percent of all pedestrian stops. This may be an indicator of racial bias in DPD pedestrian stops during that time period. For example, in 2001, approximately 90 percent of pedestrian stops made were based on officer observations. Of those stops, 33 percent of the individuals stopped were Black and 33 percent were White. Similarly, in 2002, approximately 90 percent of pedestrian stops made were based on officer observations. Of those stops, more than 34 percent of the individuals stopped were Black while 32 percent were White. In both instances, Blacks were being stopped more frequently than Whites, as Blacks only make up 10 percent of the City’s population while Whites make up more than 50 percent of the City’s population.

In this analysis, we independently controlled for factors that might explain the disparity in DPD’s pedestrian stops, including the potential racial make-up of pedestrians (versus the City as a whole); crime patterns in the City from 2001 through 2014; and pedestrian stops versus arrest populations. Although controlling for these potentially mitigating factors reduced the degree of disparity, we found that communities of color were still over represented in pedestrian stops conducted by DPD officers during the time period analyzed.

We recognize that conclusions drawn from data from 2001 through 2003 are not necessarily reflective of conclusions that could be drawn today from current data. Further, this analysis does not conclusively show whether or not DPD had effectively implemented its Biased-Policing Policy or whether officers were engaging in racial profiling. However, this information combined with the perceptions of survey respondents about DPD does make a compelling argument for why it is important to collect and analyze demographic data going forward. As the criminal justice literature shows, peoples’ views of police lawfulness and legitimacy are directly linked with
police being in compliance with their own procedures.\textsuperscript{73} Such an analysis can serve to help DPD provide assurance that DPD is in compliance with its Biased-Policing Policy and is successfully implementing relevant training.

**The Number of Class 2 Actions Carried Out by DPD Has Increased in the Last Six Years**

Another reason why it is important for DPD to collect data regarding Class 2 actions is that they are increasing in importance and frequency. The importance of Class 2 actions is indicated by the fact that percent of time spent on Class 2 actions is used as a performance metric for officers. DPD has established performance goals for officers to spend 35 percent of their time conducting Class 1 actions, 35 percent on Class 2 actions, and 30 percent on administrative items, in an effort to assist in measuring officer productivity. Figure 8 provides a breakdown of how officers divided their time annually over the last six years. 911 Dispatch time indicates Class 1 actions; Proactive Time indicates Class 2 actions.

**FIGURE 8.** Percent of Officer Time Spent of Class 1, 2, and 3 Actions

<table>
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<tr>
<th>Year</th>
<th>Goal</th>
<th>2009</th>
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<th>2011</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
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<td>30%</td>
<td>30%</td>
<td>30%</td>
<td>30%</td>
<td>30%</td>
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</tr>
<tr>
<td>911 Dispatch Time</td>
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<td>35%</td>
<td>35%</td>
<td>37%</td>
<td>42%</td>
<td>41%</td>
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<tr>
<td>Proactive Time</td>
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<td>35%</td>
<td>35%</td>
<td>33%</td>
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<td>29%</td>
<td>35%</td>
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<tr>
<td>Admin Time</td>
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<td>30%</td>
<td>30%</td>
<td>30%</td>
<td>30%</td>
<td>30%</td>
<td>30%</td>
</tr>
</tbody>
</table>

*Source: Auditor’s calculation using Denver Police Department’s Computer Aided Dispatch system data.*

A report issued by the Greater Austin Crime Commission supports DPD’s goal of 35 percent of time being dedicated to Class 2 actions, noting that when “uncommitted time dips below 35 percent, it does not provide time in sufficient unobligated blocks to be useable; whereas above

the 45 percent level is typically not cost-effective given limited fiscal resources." Based on the data shown in Figure 8, officers have been unable to reach their goal of 35 percent of time dedicated to Class 2 actions since 2010. Administrative time has remained constant at 30 percent, but meeting the demand of 911 dispatches that require immediate police response has had an impact on the amount of time officers can dedicate to proactive policing.

From January 2009 through June 2015, DPD received more than 2 million Class 1 calls (911 dispatched calls) and conducted more than 1.1 million Class 2 actions (self-initiated actions). Figure 9 provides the breakdown of the number of Class 1 and 2 actions by month.

**FIGURE 9.** Number of Citywide Police Actions by Class and Month, January 2009 – June 2015

As shown in Figure 9, the number of Class 1 actions has fluctuated by month from a low of approximately 20,500 a month to a high of approximately 33,500 a month. This fluctuation is partially due to the seasonality of crime. Figure 9 also shows that Class 1 actions have generally been on the decline despite a growing City and metro area population. The number of Class 2 actions taken by DPD has also fluctuated by month from a low of approximately 8,000 a month to a high of approximately 21,000 a month. Further, Class 2 Actions have generally been

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75 For the purposes of our analysis, only duplicates and Class 1 or 2 actions without a priority number were dropped from the Computer Aided Dispatch provided to us by DPD. This resulted in a total of 1,306 Class 1 and 2 actions being dropped from our dataset. Our final dataset consisted of 2,047,734 Class 1 actions and 1,1,30,958 Class 2 actions that spanned from January 2009 through June 2015.
increasing over the last six years. Contrasting these trends against Figure 8, it appears that officers are spending less time on Class 2 actions even though the number of Class 2 actions being carried out has been increasing. This may indicate that officers are carrying out more Class 2 actions but spending less time carrying out each one. Assessing compliance with DPD’s Biased-Policing Policy, DPD command can identify trends and implement solutions as necessary.

**Limited Demographic Data Related to Class 2 Actions**

Two indicators that could be used to determine whether Class 2 actions are made in a fair manner is if Class 2 actions are first consistently distributed across the City by police district over time, and second if they are distributed evenly in comparison to Class 1 actions. However, because DPD does not collect demographic data of individuals involved in Class 2 actions, and because our data is not linked to arrest, crime, or citation and ticketing data, it is impossible to determine whether Class 2 actions are conducted in a manner that is racially equitable.

First, the distribution of Class 2 actions across the City by police district has remained relatively consistent over time. This is shown in Figure 10 and is an indicator that Class 2 actions have been conducted in a consistent rate by district.

**FIGURE 10.** Distribution of Class 2 Actions by District and Year, 2009 – 2014

<table>
<thead>
<tr>
<th>Year</th>
<th>District 1</th>
<th>District 2</th>
<th>District 3</th>
<th>District 4</th>
<th>District 5</th>
<th>District 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>2009</td>
<td>21%</td>
<td>22%</td>
<td>15%</td>
<td>12%</td>
<td>10%</td>
<td>21%</td>
</tr>
<tr>
<td>2010</td>
<td>19%</td>
<td>24%</td>
<td>16%</td>
<td>11%</td>
<td>14%</td>
<td>17%</td>
</tr>
<tr>
<td>2011</td>
<td>16%</td>
<td>23%</td>
<td>19%</td>
<td>13%</td>
<td>14%</td>
<td>15%</td>
</tr>
<tr>
<td>2012</td>
<td>23%</td>
<td>19%</td>
<td>18%</td>
<td>15%</td>
<td>13%</td>
<td>12%</td>
</tr>
<tr>
<td>2013</td>
<td>24%</td>
<td>18%</td>
<td>17%</td>
<td>16%</td>
<td>13%</td>
<td>13%</td>
</tr>
<tr>
<td>2014</td>
<td>22%</td>
<td>17%</td>
<td>15%</td>
<td>17%</td>
<td>13%</td>
<td>18%</td>
</tr>
</tbody>
</table>

Source: Auditor’s calculation using Denver Police Department’s Computer Aided Dispatch system data.

---

76 Regardless of year, this analysis is based on DPD’s 2015 re-districted geographic boundaries for Police Districts 1-6.
As shown in Figure 10, on average, roughly 20 percent of all Class 2 actions were carried out in District 1 between 2009 and 2014, while another 20 percent were carried out in District 2. On average, roughly 16 percent of Class 2 actions were carried out in District 3 and District 4, respectively. The remaining Class 2 actions were carried out in District 5 and District 6, both of which had roughly 13 percent of Class 2 actions carried out within the district.\(^{77}\)

The change in distribution across police districts seen over the years, could be a result of several factors outside the control of officers such as varying population growth rates, types and volume of crimes, police staffing levels, and police redistricting. We do not believe that the relatively small fluctuations in the distribution of Class 2 actions across the City by police district are anything but an indicator of the constantly changing nature of police work. Rather, we find that the relatively consistent distribution of Class 2 actions across police districts is an indicator that Class 2 actions have been taken by officers across districts at a consistent rate. Thus, due to the limitations of available demographic data, we are unable to determine whether Class 2 actions are taken in a fair and equitable manner in compliance with the department’s own Biased-Policing Policy.

Further, the DOJ in cooperation with the CAN Corporation, released a report in 2002 entitled, “How to Correctly Collect and Analyze Racial Profile Data: Your Reputation Depends on It.” In the report, the authors found that data collection and evaluation is an appropriate way to address the concerns of racial profiling by blending police operational expertise with external research methods, as well as ensuring engagement with the community. Without collecting demographic data for Class 2 actions, the department cannot demonstrate that officers are not engaging in racial profiling when carrying out Class 2 actions. It could place the department at risk if it cannot demonstrate that officers are not engaging in racial profiling during Class 2 actions or that the department is taking steps to address potential issues.

Therefore, DPD should require officers to collect demographic data, at minimum, for all pedestrian and traffic self-initiated contact (Class 2 actions). DPD’s Data Analysis Unit should analyze the data to provide information to Command to assess compliance with the department’s Biased-Policing Policy and, if necessary, determine why discrepancies exist. At a minimum, the following data should be captured:

- Date/time/location (both district and precinct)
- Length of contact
- Date of Birth
- Gender
- Race/ethnicity
- Reason for contact
- Action taken/outcome
- Officer ID/badge number

\(^{77}\) There may seem to be an unusually low amount of Class 2 actions in District 6 (i.e. Downtown Denver). This is due primarily to how officers in District 6 call in Class 2 actions because of how their patrol is different from other districts. For example, rather than calling in the ten pedestrian stops they did over a thirty minute period as ten Class 2 actions, the Computer Aided Dispatch System will capture them as just one Class 2 action so that officers don’t have to radio in or log into their mobile terminals to count all ten actions. Additionally, you see a higher percentage of Class 2 actions in District 1, primarily due to the long standing emphasis on Class 2 actions in District 1 compared to other districts. The growth in Class 2 actions in District 4 meanwhile, can be attributed to the change in 2010/2011 that tracked Class 2 actions as a measure of productivity.
Despite the department’s commitment to a community-oriented policing philosophy and having a robust data analysis unit, DPD has not taken steps to ensure the community policing philosophy and efforts are effective, and that racial profiling does not exist. Further, DPD has not collected demographic data for all Class 2 police actions, which makes it difficult to ensure the department is conducting Class 2 actions in a consistent manner and without bias. By utilizing CP-SAT or a similar tool, DPD would be able to assess the results to inform strategic planning, identify training needs, inform the public about community outreach events, and enhance overall community policing efforts. Furthermore, by capturing demographic data for all pedestrian and traffic self-initiated contacts, the data analysis unit can be utilized to help ensure racial profiling does not exist and that officers are in compliance with the Biased-Policing Policy.
RECOMMENDATIONS

We offer the following recommendations to assist the Denver Police Department (DPD) in improving operations.

1.1 Community Policing Self-Assessment Tool (CP-SAT) – DPD should reach out to COPS to explore options on how to utilize CP-SAT or a similar tool. The results of the assessment should be used to inform strategic planning, identify training needs, promote DPD’s community policing initiatives to the public, and enhance overall community policing efforts.

1.2 Biased-Policing Policy – DPD should update its Biased-Policing Policy to include at least an annual assessment of the demographic data collected (as suggested in recommendation 1.3) in order to inform Command about compliance with policy.

1.3 Demographic Data Collection – DPD should require officers to collect demographic data, at minimum, for all pedestrian and traffic self-initiated contact (Class 2 actions). DPD’s Data Analysis Unit should analyze the data to ensure that officers conduct self-initiated actions in compliance with the departments Biased-Policing Policy, and if necessary determine why discrepancies exist. We have provided a list of variables officers should collect at minimum for each contact:

i. Date/time/location (both district and precinct)
ii. Length of contact
iii. Date of Birth
iv. Gender
v. Race/ethnicity
vi. Reason for contact
vii. Action taken/outcome
viii. Officer ID/badge number
OTHER PERTINENT INFORMATION

The Denver Police Department Will Implement the Use of Body Worn Cameras by October 2016

The Auditor’s Office adheres to a citizen-centric philosophy and uses reports to inform the citizenry of significant policy changes made by City agencies that affect the community as a whole. The Denver Police Department (DPD) is incorporating the use of body worn cameras (BWCs) into its policing strategy. BWCs are viewed as a means of documenting interactions between police and citizens in the wake of a number of citizen profiling and officer abuse cases that have sparked a national debate on criminal justice, police-community relations, trust in law enforcement officers, and the expanding role of technology. The following section shares pertinent information regarding the implementation of BWCs in Denver and how the strategy relates to community policing.

Body Worn Cameras Are Potentially an Important Tool for Reducing Officer Uses-of-Force and Citizen Complaints against Officers

BWCs are an audio and video recording system worn by officers that provide an additional means of documenting police interactions with people in the community. There are several anticipated benefits from instituting a BWC program, including improving relationships between police departments and the communities they serve. BWCs can benefit both officers and citizens by providing an objective account of an interaction. Some studies show that BWCs may reduce uses of force by officers on citizens and uses of force by citizens on officers, and may also be helpful in documenting if and when officers may profile individuals using demographic attributes including but not limited to race, ethnicity, and age. Once implemented, departments that use BWCs have generally seen a reduction in citizen complaints made against officers. Furthermore, the video and audio recordings can serve as a tool for both officers and civilians to review should an incident occur.

Figure 10 shows an example of the type of equipment that constitutes a BWC system. A BWC can be attached to the officer’s eyewear or attached directly to the shirt collar. While on duty, video recordings are stored in a tamper proof Controller until they are uploaded to the DPD’s cloud storage solution, Evidence.com, a product of Taser International, using a docking station (not pictured), at the end of the officer’s on-duty shift.

Officers will be required by policy to ‘tag’, or index, identifying fields for each video and upload them to the cloud through vendor provided secured application controls that prevent deletion and tampering. The equipment cost for each officer is roughly $800, which includes the camera, controller, multi-mount kit, and a video viewer, to allow officers to review and “tag” videos in the field. Additionally, each license to record and store unlimited video is approximately $950 dollars.

81 Ibid.
annually. Multi-docking stations, accommodating six controllers, allow video storage and recharging of cameras and are priced at $999 per station.

FIGURE 10. Taser Axon Flex Camera and Controller with Multi-Mount Kit

Source: Taser Axon.

The use of BWCs is expanding in law enforcement agencies across America and has bipartisan support in Washington, D.C. BWCs are beginning to be seen as a macro solution to increase law enforcement and citizen accountability by accurately capturing interactions between police and citizens.

Law enforcement agencies have received funding from the federal government to integrate BWC technology into their operations. In September 2015, the U.S. Department of Justice (DOJ) launched a $23 million pilot project to help law enforcement agencies purchase BWC technology and train officers on its use. Additionally, two pieces of legislation have been introduced in the Senate: the Police CAMERA ACT and Safer Officer and Safer Citizens Act. If passed, they will provide additional grant funding to local agencies to purchase BWCs and cover the associated implementation costs.

In 2014, DOJ’s Office of Community Oriented Policing Services (COPS Office), in partnership with the Police Executive Research Forum (PERF), released a best practice guide of recommendations and lessons learned for implementing BWC programs. The COPS Office was established through a provision of the 1994 Violent Crime Control and Law Enforcement Act, which since has provided nearly $14 billion in assistance to state and local law enforcement agencies to hire community policing officers, and fund research and develop guides, tools and training, to implement community policing principles. PERF, founded in 1976, is an independent research organization focusing on critical issues in policing and has identified best practices on

83 Ibid.
86 “The Office of Community Oriented Policing Services (COPS Office) is the component of the U.S. Department of Justice responsible for advancing the practice of community policing by the nation’s state, local, territorial, and tribal law enforcement agencies through information and grant resources.” COPS, http://www.cops.usdoj.gov/Default.asp?Item=35.
issues such as reducing police use of force, developing community policing, using technologies to deliver police services to the community, and evaluating crime reduction strategies.88

The report includes thirty-three general and eleven community outreach recommendations that agencies can consider when implementing their BWC program. The recommendations were accumulated from the research project, which included three main components: responses from 254 police departments nationwide in response to a PERF survey; interviews with forty police executives who have implemented or have considered BWCs for their jurisdictions; and a one-day conference of more than 200 police chiefs (including a DPD Commander), sheriffs, scholars, and federal criminal justice agencies in September 2013. Areas covered by the best practice recommendations to-date include recording protocols, download and storage policies, recorded data access and review, training policies, policy and program evaluation, and community outreach, as well as officer buy-in.89

Despite the rise in attention and resources dedicated to BWCs, many law enforcement jurisdictions have only recently established their own BWC programs, and many departments have not yet received funding for their BWCs. Further, entities that have implemented BWCs may not have done so for all patrol officers, in contrast to DPD, which has elected to outfit all on-duty officers with BWCs by October 2016.

**DPD Will Provide BWCs to Officers and Finalized the Department’s Official Body Worn Camera Policy in September 2015**

The decision to implement a BWC program was a proactive decision made by the Chief of Police and supported by the Mayor; there is no mandate to do so by state or local law. The effort is significant in a city of more than 500,000 residents and nearly 1,400 police officers.90 For context, U.S. police forces on average have about fifty-five officers.91 Further, DPD will roll out the BWC initiative department-wide while many law enforcement departments are limited in their deployment of BWCs due to resource constraints, policy decisions, or assignments to specific types of officers or specialty units.

The Department provided auditors with the following estimated training and deployment schedule for the roll-out of 800 cameras through October 2016 that is highlighted in Table 5.

90 DPD has an approved budgeted for an authorized strength of 1,439 for 2016.
TABLE 5. DPD Estimated BWC Program Roll Out, 2015 – 2016

<table>
<thead>
<tr>
<th>Locations</th>
<th>Equipment Installation</th>
<th>Deployment including Training*</th>
</tr>
</thead>
<tbody>
<tr>
<td>District 6, Gang Unit, Traffic</td>
<td>October 2015</td>
<td>February 2016</td>
</tr>
<tr>
<td>District 1</td>
<td>February 2016</td>
<td>March 2016</td>
</tr>
<tr>
<td>District 2</td>
<td>March 2016</td>
<td>April 2016</td>
</tr>
<tr>
<td>District 3</td>
<td>May 2016</td>
<td>May 2016</td>
</tr>
<tr>
<td>District 4</td>
<td>June 2016</td>
<td>July 2016</td>
</tr>
<tr>
<td>District 5</td>
<td>July 2016</td>
<td>September 2016</td>
</tr>
<tr>
<td>Denver International Airport</td>
<td>September 2016</td>
<td>October 2016</td>
</tr>
</tbody>
</table>

Source: DPD Command.

*DPD Command will re-evaluate after the initial roll-out of District 6 and Gang Unit BWCs, whether a more accelerated deployment can be achieved.

DPD’s Planning, Research and Support Division (Planning Division) produced two internal research reports related to BWCs in 2013 and 2015, respectively. The 2013 report focused primarily on identifying best practice models for implementing a BWC program while the 2015 report focused on BWC policies pertaining to off-duty employment and officer discipline. Both surveys relied heavily on a survey of other national policing agencies for best practices and were used by DPD Command to formulate local implementation and operational policy.

Although policies surrounding BWCs and secondary employment at law enforcement jurisdictions vary widely or are not covered at all, both the Planning Division and OIM recommended that DPD should require officers to wear BWCs while working off-duty and secondary employment.92

DPD released its final Body Worn Camera Policy on September 1, 2015. The policy did not require off-duty officers to wear BWCs, citing cost prohibitions among other administrative considerations.93 However, during an October 14, 2015 meeting of the City Council Safety and Well-Being Subcommittee, the Chief of Police stated a commitment to expanding the BWC program to sergeants, who are first level supervisors of patrol officers, as well as to officers who are assigned off-duty work for contracted or independent third-party organizations and establishments. This expansion of the BWC program to include off-duty officers, in particular, will have operational and financial consequences, which DPD continues to assess.

Before contracting with a vendor for a department-wide roll out, DPD implemented a BWC pilot program in District 6 to assess feasibility and likelihood of success and to address any potential concerns that might arise with officers, the public, or the available BWC technology. The pilot program ran from June 2014 through December 2014 and informed policy and strategic

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93 Denver Police Department Command staff includes the ranks of Chief, Deputy Chief, Commanders, Captain, and Lieutenant.
decisions, which were codified into the new policy. In addition to DPD Command, one independent academic researcher who collected data monitored the pilot program. The Office of the Independent Monitor (OIM) later reviewed the study.94

The Office of the Independent Monitor’s Review of DPD’s District 6 BWC Pilot Program Resulted in Nine Recommendations

On March 11, 2015, the OIM released its 2014 Annual Report, which included information regarding the BWC pilot program.95 While the OIM described their assessment of the six month BWC pilot program as “largely positive,” the report contained nine recommendations to further strengthen DPD’s BWC policies and procedures, as well as address preliminary concerns observed during the initial BWC deployment.96 The OIM, which is the civilian oversight agency for DPD and the Denver Sheriff Department, does not have the legal authority to require DPD to respond to recommendations. Table 6 shows each recommendation and the status of implementation according to DPD Command. During this audit, we did not perform audit work to confirm the status of implementation, but will conduct an analysis on implementation status in future audit work specifically related to BWCs. We were told the OIM will continue to revisit the BWC program in upcoming publicly available reports.

TABLE 6. OIM’s BWC Recommendations and Status of Implementation per DPD Command, 2015

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>DPD Implementation Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Provide additional training on the importance of activating BWCs prior to the initiation of citizen contacts rather than after-the-fact, when situations may escalate or deteriorate too quickly to permit BWC activation.</td>
<td>Implemented: Our training and policy outline the activation requirements. We will cover lessons learned from the pilot during training.</td>
</tr>
<tr>
<td>2. Evaluate possible equipment issues that arose during the pilot project before selecting a vendor for department-wide deployment, and provide additional training to officers in an attempt to avoid future technical or user errors.</td>
<td>Implemented prior to OIM Report: We identified and addressed the technical and user errors during the pilot. Equipment issues resulted from the vendor issuing used equipment; only new equipment will be deployed go-forward.</td>
</tr>
<tr>
<td>3. Assign BWCs to all uniformed officers who interact with the public, regardless of rank, and whether they are working on- or off-duty, including officers in specialized units such as Metro/ SWAT.</td>
<td>Partially Implemented: Current deployment for police officers and corporals in line assignments, which also includes the Gang, Traffic, and DIA Units. There is commitment to expand deployment to sergeants and off-duty, but will not include SWAT due to specialized tactics.</td>
</tr>
<tr>
<td>4. Require officers to keep BWCs activated until the actual conclusion of encounters, regardless of</td>
<td>Not Implemented: We will follow our current policy requirements and recommendations which allow</td>
</tr>
</tbody>
</table>

94 Note: the journal report containing the academic research was not finalized prior to release of this audit report.
whether or not the officer perceives the situation to have “stabilized.”

<table>
<thead>
<tr>
<th>5. Require officers to notify citizens that encounters are being recorded by BWCs, whenever possible.</th>
<th>Not Implemented: Policy encourages officers to notify citizens. Officer discretion is allowed and policy favors notification over non-notification. Training and policy also cover that there are times that notifying citizens they are being recorded could diminish communication.</th>
</tr>
</thead>
<tbody>
<tr>
<td>6. Require supervisors to provide thorough documentation of the reason for the use/non-use of BWCs.</td>
<td>Implemented during Pilot: Already part of policy and is addressed in training. The policy outlines supervisor responsibilities for documentation in their reports if an incident was or was not captured on a BWC. Supervisors are required to document why the incident did not generate any BWC media or if the BWC media has no value.</td>
</tr>
<tr>
<td>7. Provide officers with notice of possible disciplinary penalties for failing to adhere to the BWC policy.</td>
<td>Implemented: Added discipline outline for violations of policy, for failing to adhere to requirements of the policy.</td>
</tr>
<tr>
<td>8. Provide clear and specific guidance on when recording in private places (homes, restrooms, locker rooms, places of worship, certain businesses, and patient care areas) is authorized and when it is not. Provide clear retention guidelines for BWC footage that do not allow for the storage of footage with no evidentiary value for an unreasonable period of time.</td>
<td>Implemented during pilot: Training follows the policy. Retention specifics are outlined in the records retention schedule. Training will provide examples of potential settings with discussion on when and when not to activate the BWC. BWC media that has no evidentiary value will be held for 60 days.</td>
</tr>
<tr>
<td>9. Solicit officer and community input on the BWC policy and use that input to inform of the policy that will be in effect once the BWCs are deployed department-wide.</td>
<td>Implemented during pilot: This was part of our initial project plan and has been completed. Involved officers provided feedback and suggestions to improve the policy after the pilot. A policy was posted publicly and provided an email address for community comments. Command staff have also discussed the policy and upcoming implementation at community meetings across the city.</td>
</tr>
</tbody>
</table>


Purchasing Body Worn Cameras and Video Storage for Camera Data Is Expensive

On July 28, 2015, the City and County of Denver signed a $6 million contract confirming Taser International, Incorporated as the sole provider and administrator of BWC cameras, technologies, and associated data storage on behalf of DPD. The term of the contractual agreement covers five years from July 1, 2015 through June 30, 2020. The costs and terms of the
contract include license subscriptions to host storage of videos at Evidence.com, a cloud based video storage and records management system, and an initial order of 800 body worn cameras. Table 7 summarizes cost projections provided by DPD for the five-year term of the contract.

**TABLE 7. BWC Program Contractual Cost Projections, 2015**

<table>
<thead>
<tr>
<th></th>
<th>Quantity</th>
<th>Unit Price($)</th>
<th>Estimated Five Year Cost ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Equipment</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Basic Body Camera Kit</td>
<td>800</td>
<td>399.00</td>
<td>319,200</td>
</tr>
<tr>
<td>Multi Mount Kit</td>
<td>800</td>
<td>199.00</td>
<td>159,200</td>
</tr>
<tr>
<td>Single Docking/ Upload and Charging System Station</td>
<td>10</td>
<td>250.00</td>
<td>2,500</td>
</tr>
<tr>
<td>Multi-Unit Docking – Upload and Charging System Station</td>
<td>225</td>
<td>999.00</td>
<td>224,775</td>
</tr>
<tr>
<td>Viewer 8GB</td>
<td>800</td>
<td>199.00</td>
<td>159,200</td>
</tr>
<tr>
<td><strong>Evidence.com Annual License Fees</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>*Non-Cam Users – Professional</td>
<td>850</td>
<td>468.00</td>
<td>1,989,000</td>
</tr>
<tr>
<td><em>Alternate License Flat Rate Unlimited Storage</em>*</td>
<td>800</td>
<td>948.00</td>
<td>3,223,200</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td></td>
<td>$6,077,075</td>
</tr>
</tbody>
</table>

*Source: Denver Police Department.*
*Note: All Evidence.com license terms will end on the five (5) year anniversary date of the commencement date of the initial purchase of body worn cameras and Evidence.com, or approximately June 2020.

Although the City negotiated five years of unlimited storage capacity for each license purchased to load data to Evidence.com, the Department—and many other law enforcement jurisdictions around the country—also recognize that the potential implications of unknown or unforeseen storage costs may potentially supersede the costs of replacing BWC technologies, such as when cameras and equipment are broken, in need of replacement, or the Department needs to expand assignments to other officers. In the October 2015 issue of Police Chief Magazine, the Chula Vista, California, police department writes that a 30-minute MP4 video, the most common digital video format, may take up more than 800 MB (0.8 gigabytes) of storage space. The Chula Vista department conservatively estimated that if its entire force,

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97 Actual data cloud storage will be provided by Evidence.com. All Evidence.com license terms will end on the five (5) year anniversary date of the commencement date of the initial purchase of body worn cameras and Evidence.com, or approximately June 2020.
approximately 200 sworn officers, was equipped with a BWC and each officer recorded 1 hour
of video per shift, they would collect approximately 33 terabytes of video per year.98

The national trend indicates that most entities are proactively attempting to mitigate BWC
storage costs from growing exponentially by staggering data storage. DPD’s Planning Division
observed through benchmarking done for the 2013 BWC Report examples of staggered data
storage policies at other police departments when researching and developing their own BWC
policy. For example, the Salt Lake City Police Department BWC policy requires that recorded
media be assigned to a defined category for proper retention. The category assignment is then
used to define the retention length. Also benchmarked by DPD, the Fort Collins Police
Department appeared to have the most detailed, publicly available retention schedule.
Specifically, Fort Collins video recording policy mandates that all recordings be tagged as
evidence or labeled “not evidence”. However, the policy also indicates that low-level incidents,
such as moving items from the roadway, motorist assistance, traffic control, and general citizen
contacts, that include non-evidentiary recordings may be removed as soon as 30 days; and
video of traffic stops are stored for 180 days. This staggered approach allows for indefinite
storage of recorded data tied to felonies or other legal issues in compliance with local and state
law requirements, yet irrelevant data, such as ‘miscellaneous’ or accidental activations may be
removed from the system as early as seven days. DPD has addressed video retention costs in
two ways.

First, DPD’s September 2015 BWC policy states:

All recorded BWC media will be uploaded and retained in Evidence.com in
accordance with the current retention schedule. The retention of all BWC media
will comply with all applicable State of Colorado statutory requirements
regarding criminal justice record management and evidence retention and will
be based upon the current City and County of Denver Retention Guidelines.99 All
BWC media will be purged from the system in accordance with the current
retention schedule.

DPD requested a Records Retention Change on November 23, 2015 to change Section 100.080
BB Video Recordings – Vehicle and Officer Recordings of the General Records Retention
Schedule, from 30 days to 60 days for non-evidentiary recordings.

In addition to the business practice of staggering video retention reflected above in DPD’s BWC
policy, the Department’s contract also allows for unlimited data storage for a flat rate. This
should allow DPD significant time to evaluate its video retention policy to more accurately
manage, monitor, budget for, and control data storage cost concerns through 2020, and
thereafter

The Auditor’s Office plans to audit DPD’s Police Body Worn Camera Program in 2017 or 2018 in
accordance with our 2016 Audit Plan. The objective of the audit will be to evaluate the controls
around the information systems that record and store video footage from BWCs, and may
include a cost-benefit analysis regarding the use of this technology as well as the training
involved.

98 Vern Sallee, “Outsourcing the Evidence Room: Moving Digital Evidence to the Cloud,” October 2015,
99 Retention: 30 days unless retrieved pursuant to H.A.L.O. policy; mandatory destruction after 365 days except video images
retained as part of case file are retained for life of related case file.
APPENDICES

Appendix A – Denver Police Department Biased Policing Policy

118.00 - Biased Policing Policy and Criminal Intelligence Information

118.01 Policy Statement (revised 06/2015)

(1) The City and County of Denver has been, and remains, committed to the protection of civil rights and liberties for all people as expressed in the United States and the Colorado Constitutions.

(2) The Denver Police Department respects and values public safety intelligence gathering as an indispensable part of law enforcement and of national security. However, such information must be regularly and rigorously examined to ensure compliance with OMS 118.03 and state and federal constitutional and statutory provisions. No information on any individual, group, or organization will be entered into the criminal intelligence database solely because of their political views, religion, social views, associations, or expressive activities.

118.02 Biased Policing (revised 06/2015)

(1) Purpose

a. To reaffirm the Denver Police Department’s commitment to unbiased policing;

b. To reinforce procedures that serve to maintain public confidence by providing services and enforcing laws in a fair and equitable manner; and

c. To remind officers of “probable cause” and “reasonable suspicion” criteria.

(2) Biased Policing Definition: “Biased policing,” means the practice of singling out or treating differently any person on the basis of characteristics, traits, attributes or statuses identified in OMS 118.02(3).

(3) Policy

a. The policy of the Denver Police Department is to respect every person’s

1. Right to equal protection under the law;

2. Right not to be deprived of life, liberty, or property without due process of law; and

3. Right to free speech and freedom of association under the First Amendment of the United States of America.

b. It is also the policy of the Denver Police Department that, as required by the Fourth Amendment of the U.S. Constitution and Article II, Section 7 of the Colorado Constitution, all of the following police-initiated actions must be based on a standard of reasonable suspicion or probable cause to believe that a crime has been committed or is about to be committed by the person who is the subject of the detention or stop:

1. All investigative detentions, traffic stops and arrests; and

2. All searches (absent consent) of persons and/or property by officers in Denver.

In order for officers to support a determination of probable cause or reasonable suspicion for an arrest, investigative detention or traffic stop, officers must be able to articulate specific facts, circumstances and conclusions that justify the arrest, detention or stop. Officers are required to consider whether the particular suspect could reasonably have been involved in the suspected crime.

Furthermore, officers will not make routine or spontaneous law enforcement decisions (e.g., ordinary traffic stops, pedestrian stops, other stops or detentions, or decisions to request consent to conduct searches) based upon to any degree a person’s race, ethnicity, national origin, age, religion, gender, gender identity, or sexual orientation unless these characteristics, traits, attributes, or statuses are contained in suspect descriptions that have been provided to officers. Profiling or discriminating on the basis of these characteristics, traits, attributes, or statuses is prohibited.

DENVER POLICE DEPARTMENT OPERATIONS MANUAL 118 - 1
REV. 06-15

In taking police actions, officers may never rely on generalized stereotypes but may rely only on specific characteristic-based information. In other words, officers may take into account a specific suspect's reported characteristics, traits, attributes, or statuses listed above in the same way they would use specific information regarding height, weight, etc. about specific suspects.

c. Traffic enforcement and pedestrian contacts are routinely performed by officers. On the other hand, for the motorist or pedestrian who is stopped, this exchange occurs with less frequency and is often perceived as an emotionally upsetting experience. Officers should be aware of this and should strive to make each contact educational, while performing the necessary task in a fair, professional and friendly manner. In doing so, the contacted individual is hopefully left with a clear understanding of why the officer made contact and a better understanding of law enforcement practices.

(4) Business Cards

a. Officers will provide, without being asked, a business card to any person whom the officer has detained in a traffic stop, if that person is not issued a traffic summons, written courtesy traffic warning, or arrested. There is no such mandate on pedestrian stops other than those stated in OM RR-129, Giving Name and Badge Number. By statute, the business card must contain the officer's name, badge number, assignment, and the following information:

   Positive Comments or Complaints – (720) 913-6665

b. The Department will provide officers with personalized business cards containing the required information, however, should the officer not have a business card in their possession, he/she is to legibly write the aforementioned information on a piece of paper, which will be given to the individual when required by policy. Business cards printed at the officer's personal expense must contain the information required by statute.

118.03 Criminal Intelligence Information (revised 06/2015)

(1) Purpose

To establish internal controls and proper oversight for the collection, retention, dissemination, and disposition of criminal intelligence in conformance with the privacy interests and constitutional rights of individuals, groups, associations or other legal entities.

(2) Applicability

This section applies to all Denver Police Department criminal intelligence systems, whether or not they are funded as part of any multi-jurisdictional systems, programs or grants.

The policies and procedures contained in this section are in compliance with all guidelines enumerated in 28 Code of Federal Regulations Part 23, Criminal Intelligence Systems Policies. There are additional provisions, some of which are more restrictive, but none that are in conflict with the federal guidelines. The Denver Police Department will not include, in any criminal intelligence file, information which has been obtained in violation of any applicable Federal, State, local law, or ordinance, the policies of the Denver Police Department, or this section.

Systems that are specifically excluded from the requirements of this section and 28 Code of Federal Regulations Part 23 are:

- Criminal history files
- Street Checks
- Mug shot systems
- Offense and accident report systems
- Criminal investigatory case files
Appendix B – Denver Police Department Activity Log

<table>
<thead>
<tr>
<th>OFFICER / NPO DAILY ACTIVITY LOG</th>
<th>Page ___ of ___ Pages</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAME</td>
<td>DETAILS</td>
</tr>
<tr>
<td>DATE</td>
<td>MC</td>
</tr>
<tr>
<td>UNI NO</td>
<td>NO</td>
</tr>
<tr>
<td>RELEASE OFF</td>
<td>CLASS 4 P.S.P.</td>
</tr>
<tr>
<td>RELEASE ON</td>
<td>PREVENTION</td>
</tr>
<tr>
<td>TOTAL MILES</td>
<td>PARTNERSHIP</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ACT</th>
<th>TIME IN</th>
<th>TIME OUT</th>
<th>TOTAL TIME</th>
<th>LOCATION</th>
<th>ACTION, LECTURE TITLE, CONTACT PERSON, NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Class 2 Open Door</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Recovered Units</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Street Checks</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Offense Reports</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Traffic Violations</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Parking Violations</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Firearm Recovered</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Accident Reports</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CLASS 1 ACTIONS (NO.)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CLASS 2 ACTIONS (NO.)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CLASS 3 ACTIONS (NO.)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CLASS 1 ACTIONS (TIME)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CLASS 2 ACTIONS (TIME)</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
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<td>CLASS 3 ACTIONS (TIME)</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>Stop and Frisk</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CATEGORY 1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CATEGORY 2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CATEGORY 3</td>
</tr>
</tbody>
</table>
Appendix C – Total Number of Officers by City, 2012

<table>
<thead>
<tr>
<th>#</th>
<th>City</th>
<th>Total Officers</th>
<th>Population</th>
<th>Officers Per 10,000 Residents</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>New York, NY</td>
<td>34,555</td>
<td>8,289,415</td>
<td>41.7</td>
</tr>
<tr>
<td>2</td>
<td>Chicago, IL</td>
<td>11,944</td>
<td>2,708,382</td>
<td>44.1</td>
</tr>
<tr>
<td>3</td>
<td>Los Angeles, CA</td>
<td>9,992</td>
<td>3,855,122</td>
<td>25.9</td>
</tr>
<tr>
<td>4</td>
<td>Philadelphia, PA</td>
<td>6,526</td>
<td>1,538,957</td>
<td>42.4</td>
</tr>
<tr>
<td>5</td>
<td>Houston, TX</td>
<td>5,318</td>
<td>2,177,273</td>
<td>24.4</td>
</tr>
<tr>
<td>6</td>
<td>Washington, DC</td>
<td>3,867</td>
<td>632,323</td>
<td>61.2</td>
</tr>
<tr>
<td>7</td>
<td>Phoenix, AZ</td>
<td>2,979</td>
<td>1,485,509</td>
<td>20.1</td>
</tr>
<tr>
<td>8</td>
<td>Baltimore, MD</td>
<td>2,962</td>
<td>625,474</td>
<td>47.4</td>
</tr>
<tr>
<td>9</td>
<td>Detroit, MI</td>
<td>2,570</td>
<td>707,096</td>
<td>36.3</td>
</tr>
<tr>
<td>10</td>
<td>Las Vegas Metropolitan Police Department, NV</td>
<td>2,563</td>
<td>1,479,393</td>
<td>17.3</td>
</tr>
<tr>
<td>11</td>
<td>Memphis, TN</td>
<td>2,416</td>
<td>657,436</td>
<td>36.7</td>
</tr>
<tr>
<td>12</td>
<td>San Antonio, TX</td>
<td>2,276</td>
<td>1,380,123</td>
<td>16.5</td>
</tr>
<tr>
<td>13</td>
<td>San Francisco, CA</td>
<td>2,173</td>
<td>820,363</td>
<td>26.5</td>
</tr>
<tr>
<td>14</td>
<td>Boston, MA</td>
<td>2,130</td>
<td>630,648</td>
<td>33.8</td>
</tr>
</tbody>
</table>
## Total Number of Officers by City, 2012 (cont.)

<table>
<thead>
<tr>
<th></th>
<th>City</th>
<th>Full-time Law Enforcement Employees</th>
<th>Population</th>
<th>Crime Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>15</td>
<td>Honolulu, HI</td>
<td>2,057</td>
<td>975,875</td>
<td>21.1</td>
</tr>
<tr>
<td>16</td>
<td>Milwaukee, WI</td>
<td>1,906</td>
<td>599,395</td>
<td>31.8</td>
</tr>
<tr>
<td>17</td>
<td>San Diego, CA</td>
<td>1,866</td>
<td>1,338,477</td>
<td>13.9</td>
</tr>
<tr>
<td>18</td>
<td>Columbus, OH</td>
<td>1,823</td>
<td>797,384</td>
<td>22.9</td>
</tr>
<tr>
<td>19</td>
<td>Atlanta, GA</td>
<td>1,775</td>
<td>437,041</td>
<td>40.6</td>
</tr>
<tr>
<td>20</td>
<td>Charlotte-Mecklenburg, NC</td>
<td>1,717</td>
<td>808,504</td>
<td>21.2</td>
</tr>
<tr>
<td>21</td>
<td>Austin, TX</td>
<td>1,628</td>
<td>832,901</td>
<td>19.5</td>
</tr>
<tr>
<td>22</td>
<td>Indianapolis, IN</td>
<td>1,591</td>
<td>838,650</td>
<td>19</td>
</tr>
<tr>
<td>23</td>
<td>Jacksonville, FL</td>
<td>1,540</td>
<td>840,660</td>
<td>18.3</td>
</tr>
<tr>
<td>24</td>
<td>Fort Worth, TX</td>
<td>1,536</td>
<td>770,101</td>
<td>19.9</td>
</tr>
<tr>
<td>25</td>
<td>Cleveland, OH</td>
<td>1,481</td>
<td>393,781</td>
<td>37.6</td>
</tr>
<tr>
<td>26</td>
<td>Denver, CO</td>
<td>1,388*</td>
<td>628,545</td>
<td>22.1</td>
</tr>
<tr>
<td>27</td>
<td>St. Louis, MO</td>
<td>1,322</td>
<td>318,667</td>
<td>41.5</td>
</tr>
<tr>
<td>28</td>
<td>Nashville, TN</td>
<td>1,312</td>
<td>620,886</td>
<td>21.1</td>
</tr>
<tr>
<td>29</td>
<td>Seattle, WA</td>
<td>1,289</td>
<td>626,865</td>
<td>20.6</td>
</tr>
<tr>
<td>30</td>
<td>Kansas City, MO</td>
<td>1,273</td>
<td>464,073</td>
<td>27.4</td>
</tr>
<tr>
<td>31</td>
<td>New Orleans, LA</td>
<td>1,271</td>
<td>362,874</td>
<td>35</td>
</tr>
</tbody>
</table>

Source: FBI 2012 Uniform Crime Reporting (UCR) Program, Full-time Law Enforcement Employees. Asterisk (*) denotes that DPD has an approved budgeted for an authorized strength of 1,439 for 2016.
Appendix D – Community Policing Self-Assessment Summary Report

Community Policing Self-Assessment Tool

Agency ORI #: Example
Administration Period: 1
Agency Passcode: Example
Date Report Run: 6/23/2011

The Community Policing Self-Assessment Tool (CP-SAT) is intended to help your agency assess the extent to which the community policing philosophy has been implemented throughout the agency. Community policing is a philosophy that promotes organizational strategies, which support the systematic use of partnerships and problem-solving techniques, to proactively address the immediate conditions that give rise to public safety issues such as crime, social disorder, and fear of crime.

The CP-SAT is designed to measure three key areas in community policing: Community Partnerships, Problem Solving, and Organizational Transformation. The three key areas of community policing included in this report are described below.

COMMUNITY PARTNERSHIPS
Collaborative partnerships between the law enforcement agency and the individuals and organizations they serve to develop solutions to problems and increase trust in police.

PROBLEM SOLVING
The process of engaging in the proactive and systematic examination of identified problems to develop effective responses.

ORGANIZATIONAL TRANSFORMATION
The alignment of organizational management, structure, personnel, and information systems to support community partnerships and proactive problem solving.

This report first presents summary scores for each section within the CP-SAT Short Form. Following the summary scores, it provides the average rating for each question on the CP-SAT Short Form.
Summary Scores

This report summarizes the survey findings across command staff, supervisors, officers, civilian staff, and community partners. Exhibit 1.0 provides the number of respondents for the assessment. Throughout this report, if fewer than three respondents answer a question or complete a section, "N/A" (not applicable) will appear in lieu of a score. This helps to protect the confidentiality of the respondents. All questions were rated on a Likert-type scale (e.g., 1 = Not at all, 2 = A little, 3 = Somewhat, 4 = A lot, 5 = To a great extent). Results are reported as mean values (averages) for each question or set of questions.

**Exhibit 1.0. Total Number of Respondents**

<table>
<thead>
<tr>
<th>Relationship with the Agency</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Line Officer</td>
<td>33</td>
</tr>
<tr>
<td>First-line Supervisor/ Middle Management</td>
<td>22</td>
</tr>
<tr>
<td>Command Staff</td>
<td>3</td>
</tr>
<tr>
<td>Civilian Staff</td>
<td>13</td>
</tr>
<tr>
<td>Community Partner</td>
<td>12</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>83</strong></td>
</tr>
</tbody>
</table>

Exhibit 2.0 illustrates overall summary scores for each of the three modules: Community Partnerships, Problem Solving, and Organizational Transformation. Summary scores reflect the mean of 14 Community Partnership items, 24 Problem Solving items, and 42 Organizational Transformation items.

**Exhibit 2.0. CP-SAT Summary**

- **Community Partnerships**: 3.35
- **Problem Solving**: 3.48
- **Organizational Transformation**: 3.74
Summary Scores (Cont.)

Exhibit 2.1 provides the overall scores for the Community Partnerships module by stakeholder type. Community partnerships are defined as collaborative partnerships between the law enforcement agency and the individuals and organizations they serve to develop solutions to problems and increase trust in police. The major topics in this section include level of interaction with different types of partners, the extent to which the agency has a wide range of partnerships, and the agency’s general engagement with the community.

<table>
<thead>
<tr>
<th>To a great extent</th>
<th>A lot</th>
<th>Somewhat</th>
<th>A little</th>
<th>Not at all</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line Officer</td>
<td>3.17</td>
<td>3.43</td>
<td>4.35</td>
<td>3.22</td>
</tr>
<tr>
<td>First-Line</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supervisor/Middle</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Management</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Command Staff</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Civilian Staff</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Community Policing—Building Relationships, Solving Problems**
Summary Scores (Cont.)

The Problem Solving module measures the degree to which there is agency-wide commitment to go beyond traditional police responses to crime to proactively address a multitude of problems that adversely affect quality of life. Exhibit 2.2 provides the overall scores for the Problem Solving module by stakeholder type. The first section of the module contains questions about general problem solving topics, such as time officers are given to engage in the problem-solving process and technology resources available for problem solving. The next section examines problem-solving processes and is framed around the SARA model. The section includes questions on identifying and prioritizing problems, analyzing problems, responding to problems, and assessing problem-solving initiatives.

Exhibit 2.2. Problem Solving Summary

<table>
<thead>
<tr>
<th></th>
<th>Line Officer</th>
<th>First-Line Supervisor/ Middle Management</th>
<th>Command Staff</th>
<th>Civilian Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>To a great extent</td>
<td>3.38</td>
<td>3.52</td>
<td>4.40</td>
<td>3.38</td>
</tr>
<tr>
<td>A lot</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Somewhat</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A little</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not at all</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Community Policing Self-Assessment Summary Report (cont.)

Summary Scores (Cont.)

Exhibit 2.3 provides the overall scores for the Organizational Transformation module by stakeholder type. The Organizational Transformation module measures the alignment of policies and practices to support community partnerships and proactive problem solving. There are four aspects of organizational transformation measured on this assessment: agency management, personnel management, leadership, and transparency with the community.

Exhibit 2.3. Organizational Transformation Summary

<table>
<thead>
<tr>
<th>Stakeholder Type</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line Officer</td>
<td>3.71</td>
</tr>
<tr>
<td>First-Line Supervisor/Middle Management</td>
<td>3.38</td>
</tr>
<tr>
<td>Command Staff</td>
<td>4.42</td>
</tr>
<tr>
<td>Civilian Staff</td>
<td>3.78</td>
</tr>
</tbody>
</table>
Community Partnerships

Community partnerships are defined as collaborative partnerships between the law enforcement agency and the individuals and organizations they serve to develop solutions to problems and increase trust in police. The results presented here represent a snapshot of the department’s partnership activities. The results are reported by the four major sections outlined below.

The Community Partnerships module includes four concepts:

**Engagement with a Wide Range of Partners**
Examines the extent to which there is active participation of numerous types of potential community partners with your agency. These potential partners include other law enforcement agencies, other components of the criminal justice system, other government agencies, non-profits that serve the community, the local media, and individuals in the community.

**Government Partnerships (Non-law enforcement)**
Examples of non-law enforcement government agencies in your community include parks, public works, traffic engineering, code enforcement, and/or the school system. The score for government partnerships represents the depth of your engagement with these partners.

**Community Organization and Local Business Partnerships**
Examples of non-government partners include block watch groups, faith-based organizations, neighborhood associations, non-profit service providers, media, local businesses, and youth clubs. The score for community organization and local business partnerships represents the depth of your engagement with these partners.

**General Engagement with the Community**
Refers to the extent to which the agency proactively reaches out to the community to involve it in the community policing process.
Community Partnerships (Cont.)

Exhibit 3.0 provides the mean scores for the extent to which various types of organizations actively participate as community partners with your law enforcement agency. “Actively participate” refers to information sharing, attending meetings, problem identification, and/or problem solving.

### Exhibit 3.0. Engagement with a Wide Range of Partners

<table>
<thead>
<tr>
<th>Types of Partners</th>
<th>Line Officer</th>
<th>First-line Sup*</th>
<th>Cmd Staff</th>
<th>Civilian Staff</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Law enforcement agencies (e.g., Federal, State, and/or Other Jurisdictions) who serve the community</td>
<td>3.19</td>
<td>3.45</td>
<td>4.33</td>
<td>3.92</td>
<td>3.52</td>
</tr>
<tr>
<td>Other components of the criminal justice system (e.g., probation, parole, courts, prosecutors, and juvenile justice authorities)</td>
<td>3.78</td>
<td>3.91</td>
<td>5.00</td>
<td>4.00</td>
<td>3.93</td>
</tr>
<tr>
<td>Other government agencies (e.g., Parks, Public Works, Traffic Engineering, Code Enforcement, Schools)</td>
<td>3.59</td>
<td>3.55</td>
<td>4.33</td>
<td>3.91</td>
<td>3.68</td>
</tr>
<tr>
<td>Non-profit/ community-based organizations that serve community members</td>
<td>3.59</td>
<td>3.73</td>
<td>4.67</td>
<td>3.91</td>
<td>3.77</td>
</tr>
<tr>
<td>Businesses operating in the community</td>
<td>3.04</td>
<td>3.41</td>
<td>4.33</td>
<td>4.00</td>
<td>3.38</td>
</tr>
<tr>
<td>The local media</td>
<td>2.93</td>
<td>3.45</td>
<td>3.67</td>
<td>3.80</td>
<td>3.32</td>
</tr>
<tr>
<td>Individuals in the community</td>
<td>3.44</td>
<td>3.73</td>
<td>4.33</td>
<td>4.25</td>
<td>3.77</td>
</tr>
</tbody>
</table>

*First-line Supervisors/Middle Management

Note: 1 = Not at all, 2 = A little, 3 = Somewhat, 4 = A lot, 5 = To a great extent.
Community Partnerships (Cont.)

Exhibit 4.0 provides the mean scores for government partnerships, community organization and local business partnerships, and general engagement with the community. Items in these sections measured the strength, quality, and mutuality of partnerships.

Exhibit 4.0. Community Partnerships Summary

<table>
<thead>
<tr>
<th>To a great extent</th>
<th>A lot</th>
<th>Somewhat</th>
<th>A little</th>
<th>Not at all</th>
</tr>
</thead>
<tbody>
<tr>
<td>Government Partnerships</td>
<td>3.05</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Community Organization</td>
<td>3.35</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>General Engagement with the Community</td>
<td>3.20</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Community Policing Self-Assessment Summary Report (cont.)

Community Partnerships (Cont.)

Exhibit 4.1 provides the mean scores for government partnerships by stakeholder type. The questions in this section ask about the extent of involvement with these partners, such as collaboration in developing shared goals and communication with partners.

Exhibit 4.1. Government Partnerships Summary

<table>
<thead>
<tr>
<th>Stakeholder Type</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line Officer</td>
<td>2.82</td>
</tr>
<tr>
<td>First-Line Supervisor/Middle Management</td>
<td>3.17</td>
</tr>
<tr>
<td>Command Staff</td>
<td>4.43</td>
</tr>
<tr>
<td>Civilian Staff</td>
<td>2.93</td>
</tr>
</tbody>
</table>
Community Partnerships (Cont.)

Exhibit 4.2 provides the mean scores for non-government partnerships, specifically those with community organizations and local business partners, by stakeholder type. The questions in this section ask about the extent of involvement with these partners, such as collaboration in developing shared goals and communication with partners.

Exhibit 4.2. Community Organization and Local Business Partnerships Summary

<table>
<thead>
<tr>
<th></th>
<th>To a great extent</th>
<th>A lot</th>
<th>Somewhat</th>
<th>A little</th>
<th>Not at all</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line Officer</td>
<td>3.28</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>First-Line Supervisor/ Middle Management</td>
<td>3.41</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Command Staff</td>
<td>4.22</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Civilian Staff</td>
<td>2.98</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Community Policing Self-Assessment Summary Report (cont.)

Community Partnerships (Cont.)

Exhibit 4.3 provides the mean scores for general involvement with the community, such as attending community events and meetings. These scores are provided by stakeholder type.

Exhibit 4.3: General Engagement with the Community Summary

<table>
<thead>
<tr>
<th>Stakeholder Type</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Line Officer</td>
<td>3.06</td>
</tr>
<tr>
<td>First-Line Supervisor/Middle Management</td>
<td>3.50</td>
</tr>
<tr>
<td>Command Staff</td>
<td>4.44</td>
</tr>
<tr>
<td>Civilian Staff</td>
<td>2.36</td>
</tr>
</tbody>
</table>

Appendix E – Contact Card Used by Denver Police Department for State-Mandated Demographic Information Collection

**Source:** University of Colorado at Denver 1st Annual Report Denver Police Department Contact Card Data Analysis, June 1, 2001 through May 31, 2002. Released October, 2002.

---

<table>
<thead>
<tr>
<th>DENVER POLICE DEPARTMENT</th>
</tr>
</thead>
<tbody>
<tr>
<td>CITIZEN CONTACT DATA SHEET</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>YEAR</th>
<th>MONTH</th>
<th>DAY</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ 2001</td>
<td>☐ 2002</td>
<td>☐ 2003</td>
</tr>
<tr>
<td>☐ 1</td>
<td>☐ 2</td>
<td>☐ 3</td>
</tr>
</tbody>
</table>

**Time of Stop:**
- ☐ 0000-0259
- ☐ 0600-0859
- ☐ 1200-1459
- ☐ 1800-2059
- ☐ 0300-0559
- ☐ 0900-1159
- ☐ 1500-1759
- ☐ 2100-2359

**Precinct of Stop:**
- ☐ 0159

**Race Identifiable Prior to Stop:**
- ☐ Yes
- ☐ No

**Contact Type:**
- ☐ Driver
- ☐ Passenger
- ☐ Pedestrian

**Age:**
- ☐ 18-29
- ☐ 30-39
- ☐ 40-49
- ☐ 50-59
- ☐ 60-69
- ☐ 70-79
- ☐ 80-89
- ☐ 90-99

**Race/Ethnicity:**
- ☐ White
- ☐ American Indian
- ☐ Asian
- ☐ Black
- ☐ Hispanic
- ☐ Middle Eastern

**Gender:**
- ☐ Male
- ☐ Female

**Lives in City:**
- ☐ Yes
- ☐ No

**Reason for Stop:**
- ☐ Moving Violation
- ☐ Equipment Violation
- ☐ Personal Observations/Knowledge
- ☐ Incident to arrest
- ☐ Consent
- ☐ Conjury / Pat Down
- ☐ Search Warrant
- ☐ Canine Alert
- ☐ Field interview and/or Clearance
- ☐ Citation or Order-in
- ☐ Verbal or written warning
- ☐ Arrest
- ☐ Detained

**Search:**
- ☐ Yes
- ☐ No

**Contraband Seized:**
- ☐ Yes
- ☐ No

**Duration of Stop:**
- ☐ 5-9 min
- ☐ 10-19 min
- ☐ 20-29 min
- ☐ 30-39 min
- ☐ 40-49 min
- ☐ 50-59 min

**Sheriff's Dept. Employee:**
- ☐ Yes
- ☐ No

**Off-Duty (Includes secondary employment):**
- ☐ Yes
- ☐ No

---

1. **Date of Stop**
2. **Time of Stop** – Approximate time stop was initiated (within a 3 hour block)
3. **Precinct of Stop** – Location, not car assignment
4. **Race Identifiable** – Could the officer detect the race of the person contacted prior to the stop
5. **Contact Type** – Contact sheets for passengers are not required unless identification is obtained, or the person is questioned and/or searched
6. **Age of Person Stopped**
7. **Race/Ethnicity** – This is determined by the officer’s observation, not from asking the person
8. **Gender**
9. **Lives in City** – Is the person a resident of the City & County of Denver?
10. **Lives In Precinct** – Does the person reside in the precinct of the contact OR an adjacent precinct?
11. **Reason for Stop** (Mark all that apply)
    - Personal Observation – Action taken based on the observations and knowledge of the officer
    - Received Information – Action taken based on information received from outside sources
    - Contacts for which this form is completed are based on a minimum of reasonable suspicion
12. **Action Taken (Mark all that apply)** – All actions performed by the officer during the contact
13. **Search** (Mark all that apply) – Indicates if a search occurred, including a Consery/Pat Down (Fris), and if so which search type
14. **Contraband Seized** – Includes evidence, contraband, illegal weapons, drugs, etc.
15. **Duration of Stop** – Total time of contact at the scene, does not include time spent transporting a prisoner to jail and processing
16. **Sheriff's Dept. Employee** – Indicates the form was completed by a Deputy acting either on- or off-duty
17. **Off-Duty** – Indicates whether the contact occurred while the officer was off-duty or working secondary employment
January 14, 2016

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

Dear Mr. O’Brien:

The Office of the Auditor has conducted a performance audit of Police Operations – District Patrol.

This memorandum provides a written response for each reportable condition noted in the Auditor’s Report final draft that was sent to us on January 08, 2016. This response complies with Section 20-276 (c) of the Denver Revised Municipal Code (D.R.M.C.).

AUDIT FINDING 1
Limited Data Impacts the Denver Police Department’s Ability To Determine Whether Community Policing Activities Are Effective and Equitable

RECOMMENDATION 1.1
Community Policing Self-Assessment Tool (CP-SAT) – DPD should reach out to COPS to explore options on how to utilize CP-SAT or a similar tool. The results of the assessment should be used to inform strategic planning, identify training needs, promote DPD’s community policing initiatives to the public, and enhance overall community policing efforts.

<table>
<thead>
<tr>
<th>Agree or Disagree with Recommendation</th>
<th>Target date to complete implementation activities (Generally expected within 60 to 90 days)</th>
<th>Name and phone number of specific point of contact for implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Agree</td>
<td>90 Days</td>
<td>Captain Burbach Planning Unit 720-913-6890</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 1.1
The Denver Police Department (DPD) has made initial contact with the Community Oriented Policing Service (COPS) to explore options to assess the DPD’s community policing efforts. COPS has informed us that the CP-SAT tool is primarily designed for agencies receiving funding under the Cops Hiring Program (CHP). The feasibility of implementing this tool will require further review for non-grantee (like DPD) use.
**RECOMMENDATION 1.2**

**Biased-Policing Policy** – The DPD should update its Biased-Policing Policy to include at least an annual assessment of the demographic data collected (as suggested in recommendation 1.3 (2.1)) in order to inform Command about compliance with policy.

<table>
<thead>
<tr>
<th>Agree or Disagree with Recommendation</th>
<th>Target date to complete implementation activities (Generally expected within 60 to 90 days)</th>
<th>Name and phone number of specific point of contact for implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disagree</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

**Narrative for Recommendation 1.2**

We disagree with recommendation 1.2, which is based on the assumption that collecting demographic data on all contacts is the best way to assess the department’s compliance with our Biased-Policing Policy. There are many components that should be considered when evaluating evidence of biased policing and DPD regularly reviews both our Biased-Policing policy, as well as officer compliance through various mechanisms and oversight.

DPD maintains and monitors a Personnel Assessment System (PAS) and the Early Identification and Intervention System (EIIS) to identify performance deficiencies of personnel. Command officers and supervisors develop and implement effective interventions to address performance or behavioral issues that are contrary to the mission, vision, goals and policies of the Department.

Specifically related to this recommendation, DPD captures complaints of biased policing, impartial attitude and discrimination/harassment and retaliation. This data allows the Department to review and address any issues identified. Over the past four years we have seen a significant decrease in these types of allegations. For instance, in 2015 there were over two hundred thousand class 2 police interactions and only 12 allegations related to biased policing, which may or may not have resulted from class 2 actions.
AUDIT FINDING 2

RECOMMENDATION 2.1
Demographic Data Collection – The DPD should require officers to collect
demographic data, at minimum, for all pedestrian and traffic self-initiated contact (Class
2 actions). DPD’s Data Analysis Unit should analyze the data to ensure that officers
conduct self-initiated actions in compliance with the departments Biased-Policing Policy,
and if necessary determine why discrepancies exist. We have provided a list of variables
officers should collect at minimum for each contact:
 i. Date/time/location (both district and precinct)
 ii. Length of contact
 iii. Date of Birth
 iv. Gender
 v. Race/ethnicity
 vi. Reason for contact
 vii. Action taken/outcome
 viii. Officer ID/badge number

<table>
<thead>
<tr>
<th>Agree or Disagree with Recommendation</th>
<th>Target date to complete implementation activities (Generally expected within 60 to 90 days)</th>
<th>Name and phone number of specific point of contact for implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Disagree</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 2.1
We disagree with this data collection recommendation based on three considerations; 1) the offered
approach is intrusive and may turn positive police contacts into negative interactions, 2) the offered
approach does not support an efficient use of resources based on departmental goals, and 3) there is
currently no mechanism to collect the subject data. Acquiring a mechanism will require additional fiscal
resources. Additionally, there are current discussions at the legislative level related to demographic data
collection. DPD is a participant in the ongoing discussions and believes it is premature to subscribe to
the recommendation prior to the conclusion of the legislative efforts.

The mission of the DPD is to focus efforts on preventing crime in a respectful manner, demonstrating
that everyone matters. As part of this mission we make hundreds of thousands of proactive contacts that
may or may not result in enforcement action. As highlighted in the Auditor’s report, demographic
information is collected through enforcement actions, such as arrests and traffic citations, which may be
viewed as negative encounters. However, non-enforcement interactions are often positive for both
officers and community members. If officers are required to gather demographic information on all
contacts, there is a likelihood that positive interactions could change to negative contacts due to the
intrusive nature of the data collection. For instance, the positive youth contacts that DPD is actively
seeking would, under the noted recommendation, now require officers to obtain demographic and/or
identifying information from these youth.

- 3 -
Over the past three years more resources have been added to the patrol districts through civilianization, hiring of patrol officers and restructuring of the department, in order to create more proactive time for officers and enhance crime prevention. Officers are encouraged to utilize their proactive time to engage with the community in various manners that are not necessarily enforcement actions. This is in line with community policing practices which recommend 35% available time as a target minimum for officers to engage in proactive activity for crime prevention. Patrol officers currently have 26% time allocated to proactive work due to time spent on 911 calls and administrative work. Adding additional administrative work would not be an efficient use of resources based on departmental goals.

Finally, collecting demographic data on all pedestrian and traffic contacts is currently not available through the Computer Aided Dispatch system where call information is maintained. Currently data would need to be collected on a paper data card, then sent to a centralized repository where it would be scanned into a database. On average, it would take an officer up to 10 minutes to complete the data card, which would reduce the amount of time for proactive activities. The amount of time required to implement this would convert to an officer cost ranging from $700,000 to $2,000,000, or the equivalent of 7 to 20 officers, and would require additional personnel to process the data.

Please contact Deputy Chief David Quinones at 720-913-6530 with any questions.

Sincerely,

Stephanie O’Malley
Executive Director
Department of Public Safety

Cc: Kip R. Memmott, MA, CGAP, CRMA, Director of Audit Services
    Katja Freeman, MA, MELP, Audit Supervisor
    Rudy M. Lopez, MS, Lead Auditor
    Chief Robert White, Denver Police Department
    Deputy Chief David Quinones, Denver Police Department