ASSESSMENT REPORT
Denver Sheriff Department
Classification, Intake, and Safety Assessment: Implementation of Reform Recommendations
January 2018

Office of the Auditor
Audit Services Division
City and County of Denver

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Denver Auditor
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Report year: 2018
AUDITOR’S REPORT

The Enterprise Risk Services division of BKD, LLP (BKD) has completed an assessment of the Denver Sheriff Department (DSD) policies and procedures related to inmate classification and intake, and employee and inmate safety. In 2015, the consulting firm Hillard Heintze released to Mayor Michael B. Hancock and Executive Director of Safety Stephanie Y. O’Malley an independent assessment of the DSD, which resulted in 14 key findings and 277 recommendations—including 27 recommendations related to classification, intake and safety. The purpose of BKD’s assessment was to determine whether the 27 recommendations had been implemented and to report on the results of those efforts.

The assessment identifies the select recommendations offered by Hillard Heintze, and summarizes the status of implementation efforts based on the information that BKD collected through September 2017.

We extend appreciation to the DSD personnel who assisted and cooperated with BKD and us during the assessment.

Denver Auditor’s Office

Timothy M. O’Brien, CPA
Auditor
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Mr. Timothy M. O’Brien, CPA  
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Dear Auditor O’Brien:

This document is the result of our review of the Denver Sheriff Department’s (DSD) implementation of the recommendations contained in the 2015 Hillard Heintze Assessment (HHA) with its 14 key findings and 277 recommendations. The scope for this review was the 27 recommendations from the HHA regarding the DSD’s intake and classification processes.

To complete our review, we interviewed more than twenty (20) individuals holding key positions within the DSD organization. In addition, we reviewed dozens of policy documents and analyzed classification-related data provided to us from the current Jail Management System (JMS). However, the information provided to us from the JMS was of limited value in determining the actual impact of the DSD’s efforts to implement the HHA recommendations.

Our findings indicate that the DSD has made progress to consider and implement the majority of the 27 recommendations related to the DSD’s intake and classification process. Especially in 2017, identifiable progress has been made in key areas, including eliminating redundancies in the intake and classification processes, standardizing and promulgating post orders related to the these processes, and creating a Data Science Unit to collect and analyze data to improve these processes. Inmate housing classification now requires gang information to be collected for security assessment and efforts are made by staff to get inmates into appropriate programs to address their needs and to prepare them for future success.

Despite this progress, more can be done to improve the efficiency and transparency of the intake and classification processes. The current JMS restricts the ability to make improvements because it does not retain information to establish timelines. The new JMS will enable additional functionality with a robust database that retains details needed to track and assess information. The DSD will have greater capabilities to examine processes and evaluate housing needs in context of available space. The new JMS will enable better data sharing and decision making across the organization.

Along with the new JMS, as this document demonstrates, more can be done when it comes to developing and providing standard training to classification officers, raising the status of their position, and developing appropriate metrics to analyze and improve process efficiency. For example, it appears that improvements can still be made in reducing the time offenders are in intake and temporary housing. Creating process efficiencies, will result in moving individuals through the initial intake and temporary housing areas more quickly.

We appreciate the opportunity to have completed this review and look forward to addressing any questions you have. Thank you.

BKD, LLP

January 17, 2018
2. ENGAGEMENT DETAILS

Engagement Scope and Approach

Intent of Engagement

In May 2015, the consulting firm Hillard Heintze released to Mayor Michael B. Hancock and Executive Director of Safety Stephanie Y. O’Malley an independent assessment of the Denver Sheriff Department (DSD). The Hillard Heintze Assessment (HHA) was conducted from October 2014 to February 2015, and resulted in 14 key findings and 277 recommendations.

BKD, LLP Enterprise Risk Solutions (BKD) was engaged as of March 31, 2017, to perform an assessment as to whether the 27 HHA recommendations (pp. 70-81) related to inmate classification and intake have been implemented and, if so, to what extent and with what results. To do this, BKD reviewed data provided by the DSD and performed on-site interviews.

Based on data availability, a “before” and “after” data analytics assessment of the inmates housed at the jail was also part of the engagement scope. The data analytics was to focus in the areas of classification suitability, space availability and DSD employee and inmate safety. Unfortunately, the current JMS does not retain information that would make a comparison analysis possible. BKD did examine the JMS data and included the analysis to support findings when and where applicable.

BKD has developed findings and additional recommendations related to the current state of inmate classification and intake for the DSD’s consideration.

Documents Provided

The list of documents collected in the course of this Assessment is included as Appendix A.

Interviews

During the week of August 21, 2017, BKD staff members were on-site in Denver and conducted interviews. Beyond these interviews, multiple discussions were held throughout the course of the project with members of the DSD and other City/County staff.

Data & Analysis

The DSD currently utilizes the same Jail Management System (JMS) that was used during the HHA evaluation. We obtained inmate information from a data export of inmates who resided in long-term housing at either the Van Cise-Simont Detention Center (DDC) or the Denver County Jail (COJL) during the last three years. There were over 80,000 inmate records included in the file. The data file demonstrated that housing classifications rely on background research and self-reported information about or by each offender. This detailed analysis is included as Section 5.

The Enterprise Risk Services and Public Sector Consulting divisions of BKD, LLP served as the primary developers of this report.
Data Assessment Ability

During this engagement, BKD identified that the JMS system has limitations that narrows our assessment ability with extracted data. The main issue is the physical structure of the current JMS. The JMS overwrites old information with new information. It does not have the capacity to store or date the old information. This resulted in DSD using multiple different systems to retain any data pieces needed at a later date. To obtain past data in systems other than the JMS continues to be a difficult task for DSD. Thus, data was used where it was applicable and available. This is detailed throughout the report.

3. DSD MAJOR REFORM INITIATIVES SINCE 2015

Action Committee formed with support of multiple City offices

As a result of the HHA, an Executive Strategic Implementation Committee (Committee) was formed. The Committee members are from multiple City and County offices. Details about the Committee can be found at: https://www.denvergov.org/content/denvergov/en/mayors-office/programs-initiatives/sheriff-department-reform.html. The Committee oversees and monitors the implementation of the HHA recommendations and identifies metrics to assist internal efforts and to provide transparency to the public.

The Committee provided BKD an internal document on Aug 25, 2017, labeled, “The Strategic Plan Internal Execution Document.” It contains detailed records of progress towards the implementation of the HHA recommendations as well as reform recommendations received from other sources, such as the Office of the Independent Monitor. Once a recommendation is deemed completed, an assigned Department of Safety compliance officer independently reviews the progress. The item is marked approved if the officer views it as completed.

Specific action topics made up of multiple recommendations from the HHA were addressed in smaller group meetings and then brought back to the Committee. Examples of action topics that grouped individual HHA recommendations included: Employee Engagement, Inmate Classification, Wellness, Policy Development and Community Engagement.

Personnel positions created with oversight of both the DDC and the COJL

In accordance with the HHA recommendations around aligning functions across the two jails, there are now two large divisions: Operations and Administration, with oversight over both facilities. The Operations Chief oversees Inmate Management functions, including, but not limited to, classification and available inmate programs. The Administration Chief is responsible for Support Services and Administrative functions, including, but not limited to, data science with research and project development. Both of these positions were created during 2016. A position of Classification Commander was also created with oversight of both jails. This role is responsible for streamlining the jail classification and housing functions at both facilities to create better efficiencies.

Data Science Unit (DSU) is operational

HHA recommendations included that DSD develop and use analytics to support data-driven decision making. To develop an organization that could do so, the DSD requested assistance from the U.S. Department of Justice’s Office of Justice Programs (OJP) Diagnostic Center. The result is the DSD’s Data Science Unit. The Data Science Unit (DSU) made its first hire in November of
2016, and on August 1, 2017, hired the fifth person in the unit. This evaluation included verifying that the DSU functions are in line with the OJP report recommendations, which were officially released in February of 2017.

**Data metric dashboards are being created, shared and utilized in decision making**

Below is an example dashboard created by the staff at DSU. The dashboards are currently utilized by DSD Executive Staff. Power BI software is used to create the dashboards. Interviews described how the data dashboards were useful in decision making. One interview referenced example was about the ease with which overtime hours can be analyzed.

DSU works with the Executive Staff to display the information needed in an easy to use visual. The dashboards are interactive and give the user the capability to examine the finer details that make up the included aggregate numbers.

Along with the creation of DSU, there were two post orders released, research and development and technology management duties that detail information about data practices.

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**Purchase Agreement signed for a new DSD Jail Management Software**

In the course of this evaluation, BKD identified that the currently functioning JMS is the same one used in 2014. However, recognizing the limitations of the current JMS, the City has selected a replacement that will provide enhanced functionality and process insight. ATIMS is the vendor of the newly-procured system. The requirements were signed by DSD and the vendor on August 11, 2017.

BKD’s review of the requirements used to select the new JMS found them to be generally consistent with the requirements for a data-driven detention operation.
Reviews of data quality in the current JMS

In order to produce better analytics with the new ATIMS JMS, DSD has actively taken on the role of examining the data in the current JMS. These reviews consider the specific information recorded (or not) in the current JMS data fields. Then, the current data is displayed so that DSD can decide what information they want to capture (same or different) in the new JMS. For example, reviewing written descriptions of events showed that events were recorded in the JMS, but in inconsistent categories. The current system makes it difficult to review multiple written descriptions for correct category placement so it does not happen regularly.

The benefits of these data reviews include: 1. Ensure definitions are understood by employees; 2. Ensure employees are well trained on using the new system; 3. Consider configuring the new JMS differently with additional categories, questions or required entries to ensure data quality.

4. SPECIFIC BKD ASSESSMENT FINDINGS AND RECOMMENDATIONS

In addition to our work in evaluating the implementation of the HHA recommendations (detailed primarily in the following Section 6), BKD identified several other recommendations based on our findings.

Consistency of the Classification Process

Two important purposes of the classification effort include: 1) making suitable housing decisions and 2) providing important information about the offenders to the deputies who are tending to the inmates on a daily basis. Both of these purposes logically proceed from DSD’s mission “to provide safe and secure custody for those placed in our care” and parts of DSD’s vision of “being dedicated to our employees, maintaining a department based on a solid foundation of... quality leadership, training and mutual support.”

To examine the first purpose of making suitable housing decisions, the process was examined in detail. The process is outlined as follows:

1. The offender is arrested and is brought into the DDC.

2. Deputies at entry desk take the offender’s finger prints, head photo and basic demographic information.

3. There are currently “stations” which are meant to increase efficiency. Physical and mental health evaluation is one. Another involves the pre-classification officer speaking to the inmate and documenting the following: 1) the pre-classification questionnaire interview, 2) if physical or mental health alerts need to be placed on the record based on evaluation, 3) the proxy interview for abbreviated security information, 4) if protective custody is needed and/or asked for. Any additional information learned or known about the offender can be added in narrative form (saved in a different system than JMS) or sent in referral emails.

4. The rest of the booking is completed and the detainee is taken to temporary housing on the second floor of the DDC (or to special housing when needed).

5. Once the inmate is housed temporarily, attends his or her court arraignment(s) and is remaining in DSD housing, a classification officer will look up required information about the offender and fill out the primary security assessment screens. The computer-provided security score will appear when everything is entered.
6. The structured primary classification interview takes place. There is a designated place on second floor for one-on-one interviews.

7. After the interview, the classification officer looks at everything known and recorded about the inmate then uses the computer-provided security level determination or overrides it with a different security level based on the classification officer’s professional judgment. In the event that a long-term bed is not available within the appropriate classification, a post order details “spill over” options.

8. The inmate is assigned to long-term housing in either the DDC or the COJL. An appropriate housing pod and an available bed are assigned and the offender then moves to long-term housing.

9. The COJL receives a list of inmates to be transferred to them for long-term care. The classification officer reviews the information from the DDC about the offender. The offender is transferred by bus and then receives the COJL orientation and intake process. This process includes an orientation and short interview where the inmate can express any changes or concerns and becomes oriented to the COJL.

The above process was confirmed in multiple interviews, by viewing the actual computer input screens and by viewing the data retained on inmates in the JMS. The process was also compared to the Intake Classification Officer and Inmate Classification Policy Orders and found to be in line with both. Step 7 above, was examined using the data extract file from the current JMS. The current JMS security classifications are consistent, and overrides are infrequent but appear to be applied in a similarly consistent manner when they are used. See Section 5 for additional details.

Examining the second purpose of classification which involves communicating information to other officers, there appears to be limitations of the system that make it difficult to use efficiently.

For example, we observed that offender information entered in the current JMS can be inadequate for future officer usage. For example, the Primary Security Assessment asks the DDC deputy “Is there a history of prior assaultive felony convictions?” with answer choices including yes and no. As directed by the Inmate Classification Post Order, the DSD deputy looks up and reviews all electronic documents available regarding the inmate. In our interviews, we confirmed this was occurring. Examples of sources reviewed by DSD personnel to respond to the questions in the Primary Security Assessment include Department of Corrections (DOC) information, NCIC/CCIC information, criminal history, current bond information and previous DSD confinements. After looking up the details, the deputy answers “yes” or “no” without easily being able to record specifics in the JMS. Therefore, the records reflect a “yes” or “no” without the contextual information that was used to make the determination. Deputies reported they sometimes have to do duplicative research at later stages to supplement the information available to them in the current JMS.

The new JMS will have the functionality to allow DSD personnel to input this additional contextual information. The new system will allow for the capture of detailed historical information during the intake at the DDC, thus making it available to all officers viewing the record going forward. The purchase agreement document signed by the DSD and ATIMS includes DSD-required functions. On page 12 of the requirements section, it is stated that the ATIMS product’s standard functionality provides users with the ability to view detailed historical records of the inmate and to prevent the editing of such information.

Appendix E in the ATIMS and DSD agreement (shown below) is an example screen of an incident recorded for an inmate. The amount of historical information about the offender is easily read and
available in the orange box on the right-hand side. The historic information is available on screen at the same time as the incident record.

In another example, the deputies on the housing floors expressed their desire to have a simpler way of accessing important things about the offenders who are currently in their care. DSD has alert flags (codes) on inmates’ records for this type of identification, but we found in our interviews that there are too many now to remember.

The new ATIMS system will have housing grouped as on the screens below. The deputy will be able to click on his or her floor and pod (screen shot on left) and the inmates show up with the important Alert Flags available and with readable details (screen shot on right). The new ATIMS JMS will be able to provide both the details to those who need it and overall indicators to individuals who need those. These are just two basic examples of the new functionality that DSD will have with the new ATIMS JMS.
There is not specific training for new classification officers within the DSD. Basic training in classification-related topics is provided at various times during an officer’s career, but most classification knowledge is gained from years of experience working in the DSD and modeling a current classification officer until comfortable, once an individual is assigned to the role.

With the new JMS, BKD believes the most beneficial training for classification personnel will involve the new JMS collection, entry, and usage procedures. We found the most important need, currently, involves finding ways to increase intake and classification process efficiency in order to decrease the time an inmate has to wait in temporary housing after his or her need for long-term housing has been established. Classification officers have different elements of information to analyze and reconcile before making a security classification determination. It is important they have appropriate training to do this in a consistent, efficient and objective manner.

Because there does not appear to be a “new to classification” officer training, BKD recommends that after the new JMS usage training, a standardized training curriculum for the classification officer position needs to be developed.

*Inmate and Staff Safety and Security*

Safety and security for both employees and inmates is still an issue of concern at the DDC jail facility. From current DSD records, *intake related* use of force incidents have remained consistent, averaging around 260 per year for 2014-2016. This demonstrates no decline in incidents since the H&H report. The report specified that “within 24 to 36 hours of an inmate arriving at the jail, a classification deputy conducts a face to face, three to five minute primary assessment interview.”
Interviews by BKD suggested that many times it took longer than that timeframe before the classification interview occurred.

At the DDC, the arrested offender begins the intake process on first floor (nicknamed “the Pit”). It is an open area where men and women are separated in sections with seating, but there is little physical protection for the offenders or staff if someone’s behavior becomes erratic or threatening. The less time offenders have to remain in the Pit, the less chance of incidents. Using an efficient intake process that limits the length of time per offender is one way to diminish the use of force reports. Interviews relayed that there were times individuals had been in the Pit area overnight before being taken to temporary housing. BKD could not verify this with data because JMS does not retain the needed information. However, intake can benefit from examining processes to lessen safety risks by measuring and maximizing efficiencies.

Even after addressing efficiency in the Pit area, space on the second floor has to be available to temporarily house offenders after intake. The availability of space on the second floor is dependent on the processes of moving inmates out of temporary housing and into long-term housing. This sequence of dependent processes can easily contribute to lengthy inmate stays in the Pit and in second floor housing without the ability to monitor it.

Offenders whom we interviewed, said it can be close to a week before an individual is able to have a classification interview and move out of temporary housing to long-term housing. In addition, interviews conveyed the second floor temporary housing offenders are out of their cells only one hour per day. The amount of time offenders are in temporary housing (in a single cell for 23 hours a day) should be minimized as it can eventually cause safety concerns for both inmates and staff.

There is an exception for the individual(s) who volunteer to assist the officers and the other offenders in each pod. These volunteers appear to be a main communication link between the officer and offenders in the pod and are outside of their cells during the day. In interviews, these assisting offenders expressed compassion and concern for the other offenders who don’t have the chance to be an assistant and, thus, are in their cells 23 hours a day. The assisting offenders also noted there is very little in the cells for offenders to occupy their time. This was confirmed during the tour of the second floor.

Interviews with DSD personnel explained the safety reason behind having offenders in their cells 23 hours a day when in temporary housing. Behavior of many offenders when they initially arrive at the DDC is erratic. There are multiple reasons for this: drug withdrawals, mental illness and anger about their situation are at the top of the list. Therefore, for the safety of all of the people in DDC, the one-hour cell release is considered necessary. The interviewees also explained that offenders used to have reading materials etc. in their cells, but that offenders abused these privileges in the past. The safety and well-being of the deputies does need to be paramount in these types of decisions.

The data provided to BKD from the current JMS was insufficient to allow us to make specific recommendations regarding potential process efficiencies to lower safety risks for intake and temporary housing. Once the new JMS is functioning, it will be much easier for DSD to evaluate timing, efficiencies and housing availability. BKD recommends the DSD personnel re-evaluate the timing and processes from intake through long-term housing assignment under the new JMS. This type of evaluation will also assist in determining any further space needs for additional jail cells.

**Metrics to Improve Process Efficiency**

As the DSU continues its development, there are opportunities to create and display metrics which would enable the DSD to pursue continuous process improvement. BKD recommends the DSU
create live intake and housing classification dashboards with multiple metrics that can be viewed by appropriate DSD management personnel. We expect this can be implemented in concert with the implementation of the new JMS.

The dashboard should calculate time in multiple areas for each offender. For the DDC, the metrics could be divided into five areas. The five areas are:

- Intake Pit (including time at individual stations, if available)
- Temporary or short-term housing (second floor with security levels and pods)
- Specialty housing with security levels and flags
- Long-term housing with security levels and pods
- “Guest” inmates from other facilities with security levels

An aggregate average time in each area would be useful and would enable DSD management to examine trends over time in each area in order to identify opportunities for process improvements. Similarly, developing metrics for COJL occupancy rates based on individual building and security level and information about housing types such as work release housing will allow for the identification of opportunities for process improvement.

Another recommended dashboard includes occupancy and capacity metrics for pods. Viewing the pod security level and security levels of the inmates housed in the pod with these two metrics would be helpful information to have on an ongoing basis. Viewing this dashboard in conjunction with another screen that examines security levels recently assigned to those in short-term housing will further assist in examining the entire flow of processes. Examining overrides to try to determine the extent to which capacity issues are relevant could also provide valuable context.

Examining the connections between both jails, BKD recommends a dashboard tracking the number of “worker” positions and position utilization between and in both facilities.

Workers are helpful in the jails and beneficial to the inmates as they learn skills and converse with staff. The DDC, being one building with secure exits, can have security level 4s and 5s for workers. The COJL with multiple buildings (and thus multiple exits) can only have level 5s for workers. Tracking and evaluating the number of positions available and how they are assigned will aid in process efficiency and might help increase the number of inmates being assigned to be workers.

**Post Orders**

Within the DSD, post orders are meant to consist of guidelines and serve as a form of legal protection. In any work environment, employees function best when there are clear expectations. DSD deputies desire the sense of security that comes with knowing what is expected of them and what the operating rules are. The Internal Affairs Bureau (IAB) representative noted the need of current post orders with guidelines about procedures once a grievance arrives at the IAB. A grievance is a form that is submitted by an inmate at the jails which alleges misconduct or dissatisfaction with a condition of confinement. An updated post order for the IAB processes was in draft form during the time of our interviews with personnel.

It does appear that DSD has made significant strides since 2015 to update and promulgate post orders. The table below shows that four post orders became effective in 2017. The City Attorney office indicated that position responsibilities have changed and that reviewing new post orders is
included as a top priority. BKD recommends that post orders continue to be updated on a timely basis and the DSD provides appropriate training on the new or changed components.

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<th>Subject</th>
<th>DSD Order Number</th>
<th>Effective Date</th>
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<td>4005.1B</td>
<td>May-2015</td>
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<tr>
<td>Technology Management Unit (TMU) Officer</td>
<td>6675.1</td>
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<td>Use of Force*</td>
<td>5011.1N</td>
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<td>Internal Affairs and Civil Liabilities*</td>
<td>draft</td>
<td>NA-2017</td>
</tr>
<tr>
<td>Data Science Unit*</td>
<td>draft</td>
<td>NA</td>
</tr>
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*Specifics from Post Orders not included in this assessment

Overall

The new JMS configuration process and efficient usage is critical to accomplish the above recommendations. The DSD has demonstrated progress since the HHA was issued and needs to ensure the functional requirements in the JMS are configured and that effective training is implemented to enable data-driven decision making.

5. DATA ANALYSIS OF THE EXTRACT FROM THE CURRENT JMS

Data File

The data file received by BKD from the DSD is a text file, sent securely, containing information exported from the current JMS. The records consist of inmates who went through the detailed primary classification process. The JMS includes functionality that provides classification scores with the computer-recommended security levels. The primary security assessment produced by the JMS is based on both offender interviews and digital research by DSD personnel for confirmation.

Override security levels are allowed and the JMS records who made the override. From our interviews, we were told the security classification records of an inmate are maintained by DSD classification personnel. The extract file includes jail-specific information and inmate demographics. The inmate records provided were inmates with booking dates ranging from January 1, 2014 to July 31, 2017.

Data Integrity and Representation

The file is an export of multiple tables from the JMS. It includes the security levels and information gathered for the primary security assessment. This data file can be used to verify the inmates included do have information stored in the JMS and that such information is used to determine a score and security level.

The records provided to BKD included booking dates but no other informative dated information. In the current JMS, if the information is updated or changed for any reason, the new information overwrites the previously entered information. The records also do not contain all inmates booked over this time period. The inmates included are those that spent time in long-term housing.
Because the timing of entered information is not available, it makes it impossible to make conclusions about the consistency of the data entry process or the quality of the information entered. It is also not possible to obtain information about an inmate over time or to examine re-classifications during an inmate’s residence at a jail facility.

With the data limitations, our analysis does not include examining the demographics or numbers of inmates. This would lead to ambiguity because the population in this file represents only those inmates who 1) had a booking date from the included years and 2) received a classification security level because the inmate went through the primary classification process. In other words, it is a group of inmates who were in long-term housing sometime during the time frame. Given this, we evaluated only the aggregate primary classification information.

Specific Data used from File

The data file included answers to the classification questions that make up the security score calculation. Individual answers to each of the assessment questions are recorded for individual inmates. The JMS program provides a score using a point-based system. According to H&H, “DSD uses an objective classification system designed by the National Institute of Corrections (NIC) that relies on a narrow set of well-defined legal factors, reported mental health and medical issues, and personal characteristics to guide decisions on where to house and supervise inmates.” As described below, the correlation between the known questions and the computer-calculated security level score indicates scores are consistently being computed.

The four-year average (Years 2014 through 2017*) shows that over 80% of inmates are approved at the lower security levels 4 and 5 (see below).

<table>
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<th>Level 3</th>
<th>Level 4</th>
<th>Level 5</th>
<th>Total</th>
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<td>% of Total</td>
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<td>32%</td>
<td>100%</td>
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<tr>
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<td>52%</td>
<td>34%</td>
<td>100%</td>
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<td>Total Inmate Count</td>
<td>2</td>
<td>199</td>
<td>2920</td>
<td>11732</td>
<td>7779</td>
<td>22632</td>
</tr>
<tr>
<td><strong>Total Count</strong></td>
<td>102</td>
<td>1314</td>
<td>12582</td>
<td>40109</td>
<td>25923</td>
<td>80030</td>
</tr>
</tbody>
</table>

Initial Analysis

The file also included an override security level for the cases in which a DSD classification deputy determined that a different security level is needed for the inmate based on the deputy’s professional judgement. If there was no override, then the implemented / approved security level matches the computer-calculated level; otherwise, the implemented /approved level is the override level. The overrides show that additional information was used to arrive at a different security level, but the JMS records were not sufficient to pinpoint the content of the information used by the classification deputy.
The below set of graphs show the annual percentage of inmates with computer scores in the group ranges shown on the x-axis. The colored bars represent what percent of those inmates receive which security level. The score groupings are increasing right to left and chosen based on inmates being one security level (as much as possible) when calculated by the computer (left chart). The graph on the right is the same score levels, but with the implemented /approved) security classification. This is the group that includes overrides.

Fundamentally, as the auto-calculated score increases, so does the approved security level. The lower score groupings represented at the left end of the x-axis show level 4- and 5-assigned inmates. For scores above 100, security level 3 appears and some 4s. Above 200, there are levels 3 and 2 inmates. Inmates with scores of 400 and above are all security level 1 inmates.

Examining the differences in the calculated scores and overrides, exhibits movements to the neighboring levels, but rarely any extreme level changes. The overrides indicate that the factors are being included beyond the computer assessment questions.

Overall, though, the scores and levels follow the same pattern direction with 4s and 5s at lower scores and the 1s and 2s at the higher scores.
The chart below provides a detailed view of the number of inmates with the computer security level next to the approved security level. It does appear that the number of level 4 inmates calculated by the computer is being split into Level 4 and 5 when housing is assigned. That is demonstrated by the fact that the number of inmates calculated as Level 4 is typically larger than the number of inmates that are approved as Level 4. Also, the number of inmates calculated in Level 5 is typically smaller than the number approved. The computer’s additive point assessment appears to be conservative in determining these two low security levels. Following the strategy that DSD manages offenders in the best possible safe environment, it appears classification deputies assign some of the Level 4s to Level 5. The number of inmates with higher, more serious, security levels is generally consistent between the calculated and the approved levels.
6. ASSESSMENT OF IMPLEMENTATION OF HHA RECOMMENDATIONS

BKD reviewed each of the 27 HHA intake and classification recommendations to determine whether and to what extent each has been implemented. Recommendations were determined as having been “completely,” “mostly,” “partially,” or “not” implemented based on our assessment. These are defined as:

- Completely: Every part of the recommendation has been implemented.
- Mostly: All but one of the recommendation parts has been implemented.
- Partially: Only one of the recommendation parts has been implemented.
- Not: None of the parts of the recommendation has been implemented.

A summary of BKD’s assessment of the implementation status of these recommendations is included as Appendix B.

For those recommendations that have been implemented, many have been implemented fairly recently, such as within the last six months. Thus, there is a limited amount of time and information available to assess the impact level of the implementation.

**Interview Redundancies (3.16 from the HHA)**

*Revise Denver County Jail (COJL) policies to eliminate the redundancy of the primary classification interview and the subsequent proxy interview required at the COJL.*

**Finding**

Based on the information collected, we assess this recommendation as completely implemented. The pre-classification interview, the primary classification interview and the subsequent proxy interview with the primary security assessment are all occurring at the DDC.

**Justification of Finding**

Item 7 in the Inmate Classification Post Order addresses recommendation 3.16. Intake Classification: “The DDC will have a method of initially assigning inmates to housing units. This will be based on an abbreviated and preliminary assessment of safety and security needs of the facility and the individual, as well as taking into account any risk assessment information developed during the intake process.” There is a preliminary security assessment for short-term housing and primary security assessment prior to long-term housing taking place at the DDC. See section 4 for further details.

On tours of both facilities, we were able to view the setup of the intake areas, which was consistent with the interview findings. We received a demonstration walk-through of the JMS screens to examine the interview data entry processes occurring at the DDC. At COJL, we viewed those screens the classification deputies look at when an inmate is on the list to be transferred.

In addition, we confirmed the completeness of this recommendation by reviewing the Strategic Plan Internal Execution Document. The document lists that this recommendation was assigned to the Action Team of Jail Management and Operations and has been approved.
Structured Classification Interview (3.17 from HHA)

Include in the classification process at the DDC a formal, structured and meaningful interview process that provides valuable information to the facility and aids in the inmates’ housing and programmatic decisions. It should identify the inmates’ needs, skills and interests and require the classification deputies to make recommendations regarding housing, work assignments and programs.

Finding

Based on interviews and the information we collected, we assess this recommendation as mostly implemented.

Justification of Finding

Interviews detailed that structured classification interviews are occurring with offenders at the DDC. Examining the data extraction from the current JMS, the records show the system does incorporate interview information as well as information from other available sources to assist in housing classification decisions.

We interviewed one of the two designated program officers (one focuses on each facility and both are new positions since 2014). We learned that efforts are being made to expand programs which are currently offered to the inmates in security level 4 and 5 at the DDC and the security level 5 at the COJL. The higher security level (i.e.1,2,3) inmates are not considered for programs due to safety risks.

We also confirmed the implementation of this recommendation by reviewing the Strategic Plan Internal Execution Document. The document lists HHA 3.17 was assigned to the Action Team of Jail Management and Operations and has been submitted for approval from the appointed compliance officer.

The reason this recommendation is mostly implemented is that it includes multiple items and not all of them are fully covered by the classification interview process. Inmates’ “skills and interests” should be identified to apply to “work assignments”, but the program options available are not exactly considered skills, interests or work assignments.

Other Considerations and Next Steps

Current JMS limitations require that email is used for program referral to the program officer. Interviews determined that the pre-classification officer and the classification officer are doing interviews and evaluation, applying alerts to the offender record and sending emails for program referrals. The reason this recommendation is not completely implemented is because the process needs to be more efficient.

According to the signed requirements of the new JMS, Section 14 includes programs as required information. The solution required of the new JMS system automatically has the capability to flag inmates who meet or don’t meet program requirements. There is also an enhancement marked “approved at no additional charge” which enables the new JMS to generate lists of eligible inmates for a specific program. Once this new JMS functionality is implemented, enabling classification deputies to make program recommendations directly into the system and eliminating the need for separate emails, this recommendation can be assessed as completely implemented.
Interview Training (3.18 from HHA)

Train classification deputies at the DDC to conduct more detailed and in-depth interviews to obtain information on family members, residency, next of kin, criminal history, gang affiliation and conflict, mental health issues, drug history, medications, education, suicide attempts, mental health treatment, employment history and any prior incarcerations. Provide additional training for classification deputies on interviewing skills, body language and asking follow-up questions for answers that are vague or need further exploration.

Finding

Based on the information collected, we assess this recommendation as partially implemented. Additional, relevant training in mental health recognition (administered to all DSD personnel) has been provided, but BKD was provided with no evidence of specialized training based on the specific interview techniques that can be utilized by classification officers. This is not to say that BKD found the classification officers lacking in interview skills, just that the specifics of this recommendation were not fully implemented.

Justification of Finding

We spoke to multiple classification deputies regarding this HHA recommendation. Crisis Intervention Training (CIT) is now required, and training was given to existing employees in 2016. This is scenario-based training and includes psychologists discussing root causes of behavioral change. The implementation of CIT has been followed by Mental Health First Aid training. Another training effort includes a free Trauma-Informed Practices Training provided by the Denver Office of Behavioral Health and Strategies. These offerings instruct DSD personnel in better ways to communicate with inmates and enforce the policy (released summer of 2016) that force is to be used as a last resort.

BKD was provided with training dates, training materials and example follow up guidelines to the above referenced trainings. Denver 7 News did a report on March 9, 2016, that can be viewed at https://youtube.com/watch?v=f2ayYlsGrdw. The skills taught at these trainings will enhance the quality of pre-classification and classification interviews. The deputies now have usable insights to connect with and help an offender want to share personal information such as employment and education history, and past drug or gang involvement.

We also obtained information on the requirements for becoming a classification officer. Individuals interested in the position must apply, but it does not include an increase in pay. We heard in interviews that it does take a special type of person to perform this job successfully. One skill mentioned many times is the ability to get inmates to talk freely and to establish a sense of trust with the officer. Another requirement for becoming a classification officer is a minimum amount of experience so the officer’s professional judgement has been well-developed.

There does not appear to be additional training for classification deputies on interviewing skills or body language interpretation and recommendation HHA 3.18 was not found in the Strategic Plan Internal Execution Document. The classification officers interviewed by BKD were knowledgeable about these techniques and were able to explain that different types of communication are needed by different offenders.

Other Considerations and Next Steps

In the course of evaluating this recommendation, BKD finds there is a need remaining for classification-specific training, but the most beneficial training would include learning the new JMS collection, entry, and usage procedures. We found the most important need involves finding
ways to increase the amount of information recorded in the JMS, while investing in efficiencies when recording the information. Classification officers have multiple pieces of information to assemble before assigning inmate housing, so it is important that the classification officers have their own separate training.

As discussed in Section 4 above, there does not seem to be a “new to classification” officer training. Right now, training an officer to be a classification officer appears to be accomplished by assisting a current classification officer until the new officer is comfortable. While this type of training is important, there needs to be a standardized training identifying and discussing classification needs.

BKD recommends that the DSD implement a classification-specific officer training focused on enabling the efficient use of the new JMS. Using that training as a base, there needs to be a “new to classification” training that all officers receive. Updates based on post order or system changes, when required, also need to become part of the standard training.

**Housing Assignments upon Classification (3.19 from HHA)**

Revise facility policies to require classification deputies to assign inmates to specific pods within housing units based upon the information gathered during the intake interviews.

**Finding**

Based on a review of the Inmate Classification Post Order, and the Intake Classification Officer Post Order, we assess this recommendation as completely implemented.

**Justification of Finding**

The main difference between the two post orders referenced above is that one is for intake/pre-classification officers and the other is for classification officers.

The post orders specifically direct the classification officers to review records, retrieve information about current criminal charges, incident reports, separations and medical or mental health alerts (etc.). After the review is completed, the post order specifies that the inmate and the classification officer have a face-to-face interview to gather additional information. A security level and housing pod is then assigned to the offender based on all known information.

During interviews, the classification deputies consistently reported it was the interviews with offenders that played the biggest role when they decided to override a computer-calculated security level. Deputies also provided information that interviews do play a large role in pod choice if the officer determines that a gang relationship exists. Currently, officers observing and speaking to inmates provide the main source of gang identification because there are not tattoo photos recorded in the offender’s file.

**Other Considerations and Next Steps**

In the course of determining this finding, BKD identified the general consistency in the current classification process and the usage of interviews in determining housing pods for offenders, as demonstrated in the data reviewed and described in Section 5 above. Examining the increased capability of the new JMS system, it is recommended the DSD utilizes this new system to its fullest by providing classification-specific officer training to aid the deputies with housing classifications.
Immediate Housing Transfers (3.20 from HHA)

Allow classification deputies who are aware of pertinent information regarding these decisions to re-classify inmates who request housing transfers due to conflicts with inmates or other factors, rather than a deputy or supervisor who may not be aware of important classification information.

Finding

Based on the information collected, we assess this recommendation as completely implemented.

Justification of Finding

We spoke to classification deputies as well to the deputies in charge of the pods regarding this HHA recommendation. All interviewees said that the classification deputy is the person able to make a housing re-classification. If, for some reason, the classification deputy is not on duty, then an officer with higher rank is consulted. JMS data confirmation of re-classification was not possible due to the JMS limitation of old information being deleted when changes are made.

We did confirm this recommendation by reviewing the Inmate Classification Post Order. Additionally, this HHA recommendation was included in the Strategic Plan Internal Execution Document as “submitted for approval.” With the information from this evaluation the Department of Safety compliance officer will approve that the item is completed.

Reinforcement of Authority (3.21 from HHA)

Clarify and emphasize the authority of the classification staff to make housing assignments.

Finding

Based on the information collected, we assess this recommendation as mostly implemented.

Justification of Finding

We spoke to multiple deputies regarding this HHA recommendation. The strategy for communication that was outlined included the Captain conversing with the Sergeants and the Sergeants subsequently sending the information through the chain of command.

Interviewees said that they thought post order and policy information was making it through the chain of command.

We also confirmed this by reviewing the Inmate Classification Post Order, item 11.

Other Considerations and Next Steps

Interviews support the determination of this recommendation as mostly implemented and not completely implemented because there is currently not a way one could confirm all officers had been communicated to through this chain of command. Interviews also suggested that there are new ways of distributing information that are being considered.

Staff Efficiency (3.22 from HHA)

Conduct a comprehensive time and task analysis of classification deputies to leverage valuable personnel resources more effectively.
Finding

Based on the information collected, we assess this recommendation as partially implemented.

Justification of Finding

TeleStaff, an automated scheduling solution, has been implemented for DSD as a whole and it provides easily obtainable, detailed information about who, where and when everyone works on a daily basis. This was described as a tremendous improvement from the previous software. TeleStaff was utilized by other public entities so DSD adopted its use as well. This system makes capturing and planning work hours easier than it had been in the past and does contribute to this recommendation’s goal of leveraging “valuable personnel resources more effectively.” DSD provided documentation (TeleStaff information) that supports this finding.

However, while there have been time planning discussions and changes using TeleStaff, there was no indication of any completed or planned task analysis in the interviews.

Other Considerations and Next Steps

The implementation of TeleStaff does enable DSD management to “leverage valuable personnel resources more effectively” by providing insight into exactly who is working, when, and where. This enables management to review areas of potential over- or under-staffing. TeleStaff gives payroll details but does not have the ability to do task analysis. DSD management indicates that there is neither the software in place, nor the time available, to complete a task and time analysis together.

In order to completely implement this recommendation, DSD management will have to determine what length of time is considered “appropriate for the classification process,” including parts of the process such as the time length acceptable for offenders to reside on the second floor if they are awaiting long-term housing. Once target times are determined, DSD management needs to use data from the new JMS to evaluate if the time frames and human resource hours meet those targets.

Classification Staffing (3.23 from HHA)

Ensure that classification deputies are working when and where they need to. If it is not necessary to have a 24/7 presence at the DDC or COJL, the staff working overnight should be reassigned to use personnel more efficiently and reduce overtime costs.

Finding

Based on the information collected, we assess this recommendation as mostly implemented.

Justification of Finding

These findings relate to findings in “Staff Efficiency” above. The TeleStaff software maintains detailed schedules, and the decision was made that classification officers are needed at the DDC 24/7. At the COJL, however, it was determined they are needed during the daylight hours only.

The Executive Strategic Implementation Committee has determined that this recommendation was escalated and completed.
Other Considerations and Next Steps

The next steps include the DSU creating dashboards that assist in decision making which can lead to greater process efficiencies. Currently, the team has been developing dashboards with other important and obtainable metrics so the results can be evaluated by decision makers.

To completely implement this recommendation, DSD needs to combine the TeleStaff information with the new JMS data including specific tasks to determine appropriate timed tasks and working hours.

Rank and Pay (3.24 from HHA)

Consider creating an additional rank or providing specialty pay for all classification deputies, while increasing their accountability for accuracy and thoroughness of classification, because proper classification is one of the most important functions in the facility as it directly impacts the safety and security of all staff and inmates.

Finding

Based on the information collected, we assess this recommendation as not implemented.

Justification of Finding

From multiple interviews, there is currently not a plan to create an additional rank or to increase compensation for classification deputies.

We confirmed this by reviewing the Strategic Plan Internal Execution Document, which also stated there was not an implementation plan for rank or compensation adjustment at this time.

Other Considerations and Next Steps

Interviews with DSD management indicated this recommendation might be revisited in the future.

In the course of this assessment, BKD identified the responsibility of the classification officer is significant and important to the wellbeing of staff and inmates. Increasing rank and compensation would likely improve the attractiveness of the position and the level of talented individuals interested in pursuing it. Understanding the budget has to be able to support this, BKD recommends that the DSD continue to examine the feasibility of doing this in the years to come.

Validation (3.25 from HHA)

Contact the National Institute of Corrections (NIC) to request technical assistance to ensure that the classification system is validated, or examine other objective classification instruments that have already been validated as national best practices.

Finding

Based on the information collected, we assess this recommendation as completely implemented.

Justification of Finding

Interviews detailed how representatives from the Office of Justice Programs (OJP) Diagnostic Center came and provided consulting and an evaluation of current JMS processes and the development of the DSU. We confirmed this by viewing the OJP Diagnostic Center report which shows DSD’s existing capabilities and next steps. We spoke to members of the Executive Strategic
Implementation Committee who confirmed they are utilizing information learned from the OJP Diagnostic Center evaluation.

**Other Considerations and Next Steps**

Next steps for DSD include continuing to utilize resources to incorporate the recommendations from OJP. As DSD starts using the new JMS, there can be more data-driven decisions. A few years after the implementation, a follow-up review by OJP could show the progress made and provide consultation for DSD to continue expanding the use of data analytics.

**Formal Training (3.26 from HHA)**

*Provide the pre-classification deputy in the intake process with formal training on the objective classification system, and have them report to the Classification Unit. The pre-classification deputy in the intake process could assign emergency housing on the overnight shifts.*

**Finding**

Based on the information collected, we assess this recommendation as partially implemented.

**Justification of Finding**

Based on our interviews with classification officers, we have determined the pre-classification officers are now an assigned group in the Classification Unit. This assignment was recent so full training and active participation in the group meetings about inmates has not yet occurred. One pre-classification deputy said the offer to become a full-classification officer was extended in this re-assignment, but was not something the officer was interested in doing.

**Other Considerations and Next Steps**

To completely implement this recommendation, the DSD can use the new JMS classification officer training to educate the pre-classification deputies in the full-classification process, especially for those who are going to become full-classification officers. As noted in our recommendation in Section 4, new classification-specific training needs to be developed and needs to include the new JMS configuration and new efficient processes.

**Reclassification (3.27 from HHA)**

*Require the security sergeant to remove any inmate posing a threat by moving the inmate back to the classification area in the event of a fight, disturbance or disorderly offender to protect the offenders and staff, prevent potential manipulation, or determine if the offender is acting out due to a threat.*

**Finding**

Based on the information collected, we assess this recommendation as partially implemented.

**Justification of Finding**

The conclusion reached is based on multiple interviews about procedures during an incident or event as described in the HHA finding. In examining this recommendation, it was difficult to understand exactly what HHA meant by moving the inmate back to the classification area. Because there is not a “classification area” other than the interview area. However, inmates described in the recommendation are moved out of the current area to somewhere safe for everyone involved.
Other Considerations and Next Steps

With any serious incident there are notes written about what happened and why it happened to the best of the deputy’s ability. Inmates are removed from serious situations where they might cause themselves or others harm and usually put in administrative segmentation housing in a cell by themselves. Classification officers determine where they are assigned next based on information about the issue. This information was provided verbally with examples, but BKD was not able to review physical notes about multiple incidents due to the complexity of exporting the information.

The details of incidents will be much more accessible once the new JMS is implemented. In the current JMS the details of incidents are stored in a different system. BKD recommends DSD utilize resources to make certain the JMS is providing detailed information on incidents to enable appropriate re-classifications.

Institutional Classification Committee (ICC) (3.28 from HHA)

Combine the Administrative Review Board with the Classification Review Board into one body called the Institutional Classification Committee.

ICC Staffing and Scope of Review (3.29 from HHA)

Staff the ICC with classification, medical, security, Gang Unit and mental health employees, and ensure they meet daily to determine all new housing assignments and any internal moves or changes. Have the ICC review the status of inmates confined in segregation and special housing. Eliminate any administrative overrides as these decisions should fall to the ICC.

Finding

Based on the information collected, we assess the above two recommendations as partially implemented.

Justification of Finding

DSD did not create an “ICC” committee as described in the HHA recommendation. In Post Order 4142.1 effective May of 2017, there is a section with a “Classification Administrative Review Board” that is made up of at least three staff members from the different disciplines included in HHA recommendation 3.29. This Board, as part of the official Administrative Review Board, has the authority to review classification decisions. However, the Board typically only addresses classifications in complex cases or those on appeal.

The initial classification and override (if needed) is the responsibility of the classification officer. A classification captain can override the decision and, if a classification supervisor is not available, the on-duty supervisor can override the decision with good cause.

Other Considerations and Next Steps

Based on interviews, the Administrative Review Board is available for assistance for inmates and classification deputies when difficult situations arise, but isn’t a Board for everyday overrides that the classification officers can do.
Transgender Classification Process (3.30 from HHA)

Update COJL’s transgender classification and management process to include the January 2014 department order mandates that address classification.

Finding
Based on information collected, we assess this recommendation as completely implemented.

Justification of Finding
Post Order 4005.1, released May 2015, specifically addresses transgender classification and management. When it noted as an alert key in an offender’s file during intake and classification, the individual is placed in Administrative Segregation (AD SEG) status. This status maintains the safety of the offender by keeping them separated from other offenders. The transgender offender is then interviewed by the Transgender Review Board within 72 hours and appropriate housing is based on the individual circumstances of each offender.

Other Considerations and Next Steps
The new JMS has the capability to aid in the above process to increase efficiencies. The agreement with ATIMS specifies that DSD’s policies for Transgender/Gender Variant offenders be supported. This is noted as being available through a recent enhancement to the JMS software.

Authorization (3.31 from HHA)
Clarify and emphasize the authority of the classification staff to make all housing assignments, and require them to consider gang affiliation when determining where to house inmates.

Information Sharing (3.32 from HHA)
Require classification deputies to incorporate questions on gang ranks and known associations in their intake interviews and share the information with the gang specialist at each facility. Establish a formal liaison process to ensure classification deputies are sharing information regarding inmates’ gang affiliations with members of the gang unit.

Use of Gang Intelligence (3.33 from HHA)
Keep updated gang intelligence on inmates who should be kept separate from other inmates. Access to the gang intelligence file should be granted to the classification deputies.

Finding
Based on the information collected, we assess the above three HHA recommendations related to the integration of gang-related information into the classification process (3.31, 3.32, 3.33) as mostly implemented.

Justification of Finding
A question about gang involvement was added to the Primary Security Assessment. It is now part of the classification process.

Interviews with classification deputies consistently indicated the gang unit’s files are required to be stored separately from individual inmate records. Information gathered in the primary
classification interview and other research will show in JMS with the alert key G including the gang faction (if known) being required in the comment box (Post Order 4142.1).

A couple classification officers are also part of the gang unit so it is easy for them to keep gang information knowledge up to date. Other classification deputies have been granted access to go to a physical location where the records are stored and view them. To make this process easier, the units are undertaking weekly meetings and written communications to formalize a liaison process so all classification officers are able to stay informed of gang information and activity.

**Other Considerations and Next Steps**

The general intent of this recommendation is to promote ongoing communication between the Classification and the Gang units for purposes of increasing DSD’s knowledge about gang activities inside and outside of the two facilities. DSD has been actively working on incorporating this communication and has implemented the HHA recommendation 3.32 and 3.33 towards accomplishing both.

Examining the requirements in the new JMS agreement, the new solution will assist in providing the link between the known gang information and the incoming offenders and provide an alert without compromising the required gang unit record separation for security concerns. The alerts can be as specific as a known affiliate of a gang, a suspected gang member or a verified gang member. It also provides the capability of easily producing reports by housing pod with detailed gang information.

**In-Person Interviews (3.34 from HHA)**

*Require classification deputies at the DDC and COJL to conduct face-to-face interviews with inmates. Ensure the interviews include questions that allow deputies to document inmates’ needs and refer them to Department programs, either directly or by ensuring program staff actively recruits inmates to participate in programs. If the inmates’ needs have already been identified at the DDC, the COJL could refer inmates to COJL programs.*

**Finding**

Based on the information collected, we assess this recommendation as mostly implemented.

**Justification of Finding**

The Classification Post Order specifies deputies in both the DDC and COJL conduct interviews as a necessary part of classification.

We spoke to classification deputies in multiple ranks regarding this HHA recommendation. The deputies described in detail the information asked and recorded and the program referral sent by email to the appropriate person(s). The inmate is then contacted about joining the program.

We also confirmed this using the Strategic Executive Plan Implementation document as it was noted as approved by the safety officer.

**Other Considerations and Next Steps**

The reason this recommendation is not considered completely implemented is because the email process of program referrals is time consuming and subject to human error. The new JMS has capabilities of creating program lists that will create major efficiencies in program assessment and communication over the current process. BKD recommends that the DSD spend time configuring the new JMS and training officers to utilize these efficiencies.
**Program Referral (3.35 from HHA)**

Distribute handouts to inmates that identify the many services and programs available to them. For example, if the inmate does not have a GED or high school diploma, classification deputies could refer the inmate to DSD’s in-house GED program. Or if an inmate is a parent and has substance abuse issues that led to the removal of children from the home, the inmate could be referred to substance abuse programs and parenting classes.

**Finding**

Based on the information collected, we assess this recommendation as mostly implemented.

**Justification of Finding**

We spoke to multiple classification officers and a program person specialist regarding this HHA recommendation. There are GED programs and substance abuse programs available. A referral process exists for programs and this process is utilized in both jails. Information about programs is available to inmates during jail orientation. The programs housed in the jail are available to long-term inmates. We confirmed this on our tours by witnessing program implementation and the inmates we spoke to indicated they were happy to be able to be a part of it.

We also confirmed this using the Strategic Executive Plan Implementation document as it was noted as approved by the safety officer. To completely implement this finding, the DSD needs to make information readily available about services that could benefit all offenders. Many offenders come into DSD but do not go to long-term housing. Interviewees mentioned organizations DSD is connected to in the community that offer various services. BKD recommends that additional information be viewable on the television screen or have handouts available in the Pit area to give assistance to more offenders who are brought to the DDC.

**Other Considerations and Next Steps**

While programs are working and expanding, the processes could be much easier and reach more offenders. The new JMS will enable a new, more efficient process. According to the software agreement, the new JMS has the capability (off the shelf) to send and log program referrals. It also has the ability to produce class lists, show incoming offenders on referral lists created by the system with criteria chosen by a user, and store progress documentation. Consequently, DSD will have the ability to review program outcomes of all programs offered.

BKD recommends that the DSD verify the program referral process is fully utilized in the new JMS and making this part of the mandatory training for intake and classification personnel.

**Executive Review (3.36 from HHA)**

Require Executive Staff to review the housing plans at both the DDC and COJL.

**Finding**

Based on the information collected, we assess this recommendation as completely implemented.

**Justification of Finding**

We spoke to an Executive Strategic Implementation Committee member, the Sheriff and a Sergeant about this recommendation. Interviews indicated that each of them had reviewed the plans. The interview with the Sheriff indicated that housing plans were reviewed at the start of the
response to the HHA recommendations. The current plan and action to renovate space at the COJL for long-term female inmates also illustrates that discussion took place regarding housing plans.

**Custody (3.37 from HHA)**

*Consider having the CDOC assume custody of its inmates immediately or shortly after they are arrested to open up space in its housing unit. Parole violation hearings could also be held at the CDOC, which could alleviate some of the housing issues DSD faces.*

**Finding**

Based on the information collected, we assess this recommendation as partially implemented.

**Justification of Finding**

This recommendation goes along with the flexible temporary-housing agreements (HHA 3.39) from which we learned that the DDC does work together with CDOC to ensure DDC has enough space. The parole violation hearings are still being held at the DDC. This recommendation was not found on the action plan section of the Strategic Internal Execution document.

**Space Planning (3.38 from HHA)**

*Consider launching preliminary discussions with an engineering firm or architect to determine if existing space could be renovated to create single or double cells at the COJL. Increasing the number of residents who could remain at the COJL would allow the DDC to have more space available to maintain the integrity of inmates’ housing classifications. Consider having the engineering firm or architect also evaluate the potential for converting the vacant buildings at the COJL, as well as the potential of constructing an additional building of the COJL property.*

**Finding**

Based on the information collected, we assess this recommendation as partially implemented.

**Justification of Finding**

The tour showed specific spaces that are going to being renovated at the COJL. The interviewees told us the renovated areas will be used for long-term women’s housing. The DDC was meant to be a short term facility for females, but one of the pods has been assigned to long-term females because of an increase in the number of female inmates needing housing. Interviewees indicated there is not a plan, at this time, to build any additional buildings on the COJL property for jail expansion.

**Other Considerations and Next Steps**

This recommendation includes long-term expansion ideas that may or may not be in the foreseeable future for DSD. Data analytics with data collected in the new JMS can help guide some of these decisions.

**Cost Recovery (3.39 from HHA)**

*Re-evaluate allowing outside agencies like the CDOC to house inmates in DSD facilities or allow these agencies to house inmates temporarily, but with an understanding that the costs to do so would be increased and billed to these agencies to fund any potential DSD housing expansion.*
Finding

Based on the information collected, we assess this recommendation as partially implemented.

Justification of Finding

Interviews and housing pod documentation indicate this source of income is being utilized but does depend on the current jail population. We confirmed this by reviewing the housing assignments the days we were onsite. The DDC has CDOC inmates and the numbers fluctuate over time. The COJL does not house the higher security levels, so most of this type of temporary housing involves the DDC.

The interviews of both the Sheriff and a Sergeant indicated these housing assignments are paid for by the CDOC or other applicable agency. We were told that agreements need to be flexible with the number of inmates in any particular security level. The number of temporary assignments depends on the current housing situation of the DDC. We learned from interviews that adjusting the number of these temporarily housed inmates can have an impact on other DDC inmates being housed appropriately.

Other Considerations and Next Steps

This HHA recommendation is partially implemented because there are multiple components to this recommendation. The last part points to increasing the cost to fund potential DSD housing expansions. Interviews did indicate that DSD housing expansion has not been discussed formally. Renovating and reutilizing spaces at the COJL is the current focus. Additionally, we did not find this recommendation in the action plan part the Strategic Internal Execution document. Based on our review, the needed flexibility makes this revenue stream variable.

Winter Wear (3.40 from HHA)

Consider purchasing coats and gloves for inmates at the COJL to use during cold weather so they can use the designated space for recreation.

Finding

Based on the information collected, we assess this recommendation as not implemented.

Justification of Finding

Interviews with the executive team and officers at the COJL did not agree with this HHA recommendation. Security Level 5s (minimum security) are the only level of inmates cleared to go outside. The safety guidelines do not allow the inmates to go out when it is very cold. There are the worker inmates who occasionally have to go between buildings. If an inmate is asked to go outside in the cold for some reason, we were told they are provided coats, gloves and proper shoe attire as needed.

Other Considerations and Next Steps

In the course of determining this finding, BKD identified that inmate and staff safety concerns make it so this recommendation does not have to be implemented by ordering a large number of items. The items that COJL currently maintains are believed by COJL staff to be appropriate to the actual need for winter wear items.
Exercise Videos (3.41 from HHA)

Purchase exercise videos and mats to increase the ability for inmates to perform large muscle exercise.

Finding

Based on the information collected, we assess this recommendation as not implemented.

Justification of Finding

The interview with the executive team regarding this HHA recommendation indicates that it was not an approved recommendation. Inmates in both jails have access to push up and pull up bars and a basketball court. Also, yoga is currently being taught at the COJL. These activities meet the American Correctional Association (ACA) requirements for physical activity.

We confirmed this with observations during tours of both facilities and also confirmed that both facilities are on the ACA accredited list.

Other Considerations and Next Steps

Physical exercise being available to inmates for basic health considerations is important. If DSD decides to expand or change exercise options, the ACA has many resources DSD can consider.

Legal Review (3.42 from HHA)

Ensure DSD has an understanding of the legal landscape regarding inmate confinement, and ensure the DSD policies are in compliance with legal standards.

Finding

Based on the information collected, we assess this recommendation as completely implemented.

Justification of Finding

There have been numerous initiatives the DSD has pursued since the release of the HHA in 2015 that signal the organization’s commitment to operating in conformance with requirements regarding inmate confinement. The City Attorney’s office has reviewed many new post orders in the last couple of years to make sure the updates meet legal standards. For example, there are four orders which BKD reviewed that have been released in the first half of 2017. Both DSD facilities hold ACA accreditation, which is also obtained through a review of procedures from an appointed ACA committee. In addition, the DSD contacted the U.S. Department of Justice’s Office of Justice Programs (OJP) and received consultation by the OJP Diagnostic Center on data-driven practices based on an National Institution of Corrections report, “Running an Intelligent Jail” containing model practices and ideal processes in assessing and implementing jail information management systems.

DSD Executive Management personnel also spoke about the meetings, conferences and other agency collaborations where they discuss the newest research and practices.
Appendix A – List of Documents

1. Intake Pre-Classification Questionnaire
2. Initial Classification Interview Questionnaire
3. Proxy Interview Screen(s)
4. Primary Security Assessment Screen(s)
5. Protective Custody Form
6. DSD Classification Unit Levels 2017
7. Post Order 4410.1N. Inmate Classification Current Revision January 2017
8. Post Order 4142.1 Classification Housing Current Revision May 2017
9. DDC Intake Classification Officer PO 41714.A Current Revision May 2017
10. Post Order 6654.1B. Data Analytics Division
11. Post Order 6875.1. Technology Management Unit
12. DSD Internal Strategic Plan Execution Document
15. Trauma-Informed Practices Training
16. DSD Diagnostic Analysis 2017
17. Denver Sheriff Department Overview June 2017
18. Data Science Unit Dashboard 2017 screen shots
19. The Act 1 Group TECHS_2017 - JMS RFP and signed agreement
20. Use of Force Counts for 2015-YTD
21. Post Orders for Internal Affairs (not yet released)
## Appendix B – BKD Recommendations

<table>
<thead>
<tr>
<th>Report Section with Details</th>
<th>#</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>1</td>
<td>A standardized curriculum for training classification functions using the new JMS is recommended to be developed and the training provided. It should be made available for new classification officers and updated as needed.</td>
</tr>
<tr>
<td>4</td>
<td>2</td>
<td>Using data from the new JMS, it is recommended the DSD evaluate the timing, efficiencies and housing availability from intake through long-term housing. This type of evaluation will also be able to assist in determining any further space needs for additional jail cells.</td>
</tr>
<tr>
<td>4</td>
<td>3</td>
<td>BKD recommends the DSD create intake and housing classification dashboards with multiple metrics from the new JMS system that can be viewed by appropriate DSD management personnel</td>
</tr>
<tr>
<td>4</td>
<td>4</td>
<td>BKD recommends the DSD continues to update post orders a timely basis and provide appropriate training on the new or changed components.</td>
</tr>
<tr>
<td>6</td>
<td>5</td>
<td>BKD recommends Using TeleStaff data information with new JMS data to examine classification officer tasks to evaluate timed processes and efficient work hours.</td>
</tr>
<tr>
<td>6</td>
<td>6</td>
<td>BKD recommends that DSD continue examining the feasibility of rank and pay increases for classification officers in the years to come.</td>
</tr>
<tr>
<td>6</td>
<td>7</td>
<td>BKD recommends the DSD to utilize resources to enable appropriate classifications and details about recorded incidents</td>
</tr>
<tr>
<td>6</td>
<td>8</td>
<td>BKD recommends the DSD utilize the gang functions of the new JMS.</td>
</tr>
<tr>
<td>6</td>
<td>9</td>
<td>BKD recommends the DSD utilize the program referral functions of the new JMS and making training mandatory for intake and classification personnel.</td>
</tr>
<tr>
<td>6</td>
<td>10</td>
<td>BKD recommends the DSD have information available to all offenders about resources and programs by having it in the intake “Pit” area. Handouts, wall hangings or television are possible ways to communicate this information.</td>
</tr>
<tr>
<td>4</td>
<td>11</td>
<td>Overall, the configuration process and efficient usage of the new JMS is critical to achieve the above recommendations. The DSD has made significant progress in implementing recommendations and needs to ensure the functional requirements in the JMS are configured and that effective training is implemented to make use of data-driven decision making.</td>
</tr>
</tbody>
</table>
## Appendix C – Assessment of Implementation of HHA Recommendations

<table>
<thead>
<tr>
<th>HHA #</th>
<th>HHA Recommendation</th>
<th>Status of Implementation</th>
<th>Status/Justification/Next Steps</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.16</td>
<td>Revise Denver County Jail (COJL) policies to eliminate the redundancy of the primary classification interview and the subsequent proxy interview required at the COJL.</td>
<td>COMPLETELY</td>
<td>Updated post orders and interviews that the post orders are being followed.</td>
</tr>
<tr>
<td>3.17</td>
<td>Include in the classification process at the DDC a formal structured and meaningful interview process that provides valuable information to the facility and aids in the inmates' housing and programmatic decisions. It should identify the inmates' needs, skills and interests and require the classification deputies to make recommendations regarding housing, work assignments and programs.</td>
<td>MOSTLY</td>
<td>There is a structured primary classification interview that aids the classification officer in housing decisions. Officers are giving email referrals to programs but the interview content required does not include skills and interests or work assignments or programs.</td>
</tr>
<tr>
<td>3.18</td>
<td>Train classification deputies at the DDC to conduct more detailed and in-depth interviews to obtain information on family members, residency, next of kin, criminal history, gang affiliation and conflict, mental health issues, drug history, medications, education, suicide attempts, mental health treatment, employment history and any prior incarcerations. Provide additional training for classification deputies on interviewing skills, body language and asking follow-up questions for answers that are vague or need further exploration.</td>
<td>PARTIALLY</td>
<td>While general training on mental health and related subjects has been provided to DSD personnel, specific training to classification officers has not been provided. Implement training specifically for classification officers. Include efficient and comprehensive use of the new JMS as part of the training.</td>
</tr>
<tr>
<td>3.19</td>
<td>Revise facility policies to require classification deputies to assign inmates to specific pods within housing units based upon the information gathered during the intake interviews.</td>
<td>COMPLETELY</td>
<td>Security level classification and housing decisions are made based on the interviews and research completed by DSD classification personnel.</td>
</tr>
<tr>
<td>3.20</td>
<td>Allow classification deputies who are aware of pertinent information regarding these decisions to re-classify inmates who request housing transfers due to conflicts with inmates or other factors, rather than a deputy or supervisor who may not be aware of important classification information.</td>
<td>COMPLETELY</td>
<td>Re-classification decisions are made by classification personnel.</td>
</tr>
<tr>
<td>HHA #</td>
<td>HHA Recommendation</td>
<td>Status of Implementation</td>
<td>Status/Justification/Next Steps</td>
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<tr>
<td>3.21</td>
<td>Clarify and emphasize the authority of the classification staff to make housing assignments.</td>
<td>MOSTLY</td>
<td>A strategy has been implemented for communication through the chain of command. It was thought by interviewees that new post order and policy information is going through the chain of command.</td>
</tr>
<tr>
<td>3.22</td>
<td>Conduct a comprehensive time and task analysis of classification deputies to leverage valuable personnel resources more effectively.</td>
<td>PARTIALLY</td>
<td>TeleStaff has been implemented to provide improved staffing efficiencies. Use TeleStaff information with the new JMS data to examine classification officer tasks to determine goals for timed tasks and working hours.</td>
</tr>
<tr>
<td>3.23</td>
<td>Ensure that classification deputies are working when and where they need to. It is not necessary to have a 24/7 presence at the DDC or COJL, the staff working overnight should be reassigned to use personnel more efficiently and reduce overtime costs.</td>
<td>MOSTLY</td>
<td>The decision was made that classification officers are needed at the DDC 24/7. At the COJL, however, it was determined they are needed during the daylight hours only. Use TeleStaff information with the new JMS data to examine classification officer tasks to determine goals for timed tasks and working hours.</td>
</tr>
<tr>
<td>3.24</td>
<td>Consider creating an additional rank or providing specialty pay for all classification deputies, while increasing their accountability for accuracy and thoroughness of classification, because proper classification is one of the most important functions in the facility as it directly impacts the safety and security of all staff and inmates.</td>
<td>NOT</td>
<td>The DSD has made no progress on this recommendation. Interviews indicated this might be reconsidered in the future.</td>
</tr>
<tr>
<td>3.25</td>
<td>Contact the National Institute of Corrections (NIC) to request technical assistance to ensure that the classification system is</td>
<td>COMPLETELY</td>
<td>The OJP was contacted and has provided significant input into the DSD’s operating processes.</td>
</tr>
<tr>
<td>HHA #</td>
<td>HHA Recommendation</td>
<td>Status of Implementation</td>
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<tr>
<td>3.26</td>
<td>Provide the pre-classification deputy in the intake process with formal training on the objective classification system, and have them report to the Classification Unit. The pre-classification deputy in the intake process could assign emergency housing on the overnight shifts.</td>
<td>PARTIALLY</td>
<td>Classification-specific training should be developed and include the new JMS configuration and classification-specific efficient processes.</td>
</tr>
<tr>
<td>3.27</td>
<td>Require the security sergeant to remove any inmate posing a threat by moving the inmate back to the classification area in the event of a fight, disturbance or disorderly offender to protect the offenders and staff, prevent potential manipulation, or determine if the offender is acting out due to a threat.</td>
<td>PARTIALLY</td>
<td>Currently, there is not a “classification area” that a threatening offender can be moved to. It is more likely the offender would go to special housing.</td>
</tr>
<tr>
<td>3.28</td>
<td>Combine the Administrative Review Board with the Classification Review Board into one body called the Institutional Classification Committee.</td>
<td>PARTIALLY</td>
<td>DSD chose not to implement a committee called the ICC. However, the Administrative Review Board does review classification cases and appeals.</td>
</tr>
<tr>
<td>3.29</td>
<td>Staff the ICC with classification, medical, security, Gang Unit and mental health employees, and ensure they meet daily to determine all new housing assignments and any internal moves or changes. Have the ICC review status of inmates confined in segregation and special housing. Eliminate any administrative overrides as these decisions should fall to the ICC.</td>
<td>PARTIALLY</td>
<td>DSD chose continue with the Administrative Review Board but has the staff members from all those areas reviewing classification cases and appeals.</td>
</tr>
<tr>
<td>3.30</td>
<td>Update COJL’s transgender classification and management process to include the January 2014 department order mandates that address classification.</td>
<td>COMPLETELY</td>
<td>Implemented via Post Order 4005.1B</td>
</tr>
<tr>
<td>3.31</td>
<td>Clarify and emphasize the authority of the classification staff to make all housing assignments, and require them to consider gang affiliation when determining where to house inmates.</td>
<td>MOSTLY</td>
<td>DSD is implementing meetings, memos, and access, but utilizing the functionality of the new JMS in regards to gangs will be more effective.</td>
</tr>
<tr>
<td>3.32</td>
<td>Require classification deputies to incorporate questions on gang ranks and known associations in their intake interviews and share the information with the gang specialist at each facility. Establish</td>
<td>MOSTLY</td>
<td>DSD added the question to the primary security assessment, but...</td>
</tr>
<tr>
<td>HHA #</td>
<td>HHA Recommendation</td>
<td>Status of Implementation</td>
<td>Status/Justification/Next Steps</td>
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<tr>
<td>3.33</td>
<td>Keep updated gang intelligence on inmates who should be kept separate from other inmates. Access to the gang intelligence file should be granted to the classification deputies</td>
<td>MOSTLY</td>
<td>Access is granted but time consuming. The new JMS can provide the information when it is needed.</td>
</tr>
<tr>
<td>3.34</td>
<td>Require classification deputies at the DDC and COJL to conduct face-to-face interviews. Ensure the interviews include questions that allow deputies to document inmates’ needs and refer them to Department programs, either directly or by ensuring program staff actively recruits inmates to participate in programs</td>
<td>MOSTLY</td>
<td>Interviews have been implemented, but the email process for referrals is time consuming and subject to human error. The new JMS has much more capabilities around program referrals.</td>
</tr>
<tr>
<td>3.35</td>
<td>Distribute handouts to inmates that identify the many services and programs available to them. For example, if the inmate does not have a GED or high school diploma, classification deputies could refer the inmate to the DSD’s in-house GED program. Or if an inmate is a parent and has substance abuse issues that led to the removal of children from the home, the inmate could be referred to substance abuse programs and parenting classes.</td>
<td>MOSTLY</td>
<td>Programs (when in long-term housing) and program referrals are functioning. Handout information is part of the orientation materials provided. Utilizing the referral features in the new JMS and implement training to the intake and classification personnel will be more efficient.</td>
</tr>
<tr>
<td>3.36</td>
<td>Require Executive Staff to review the housing plans at both the DDC and the COJL</td>
<td>COMPLETELY</td>
<td>The Sheriff and other DSD executives indicate that they have reviewed housing plans for both facilities.</td>
</tr>
<tr>
<td>3.37</td>
<td>Consider having the CDOC assume custody of its inmates immediately or shortly after they are arrested to open up space in its housing unit. Parole violation hearings could also be held at the CDOC, which could alleviate some of the housing issues DSD faces.</td>
<td>PARTIALLY</td>
<td>DDC does work together with the CDOC to ensure adequate housing space. The parole hearings still occur at the DDC.</td>
</tr>
<tr>
<td>3.38</td>
<td>Consider launching preliminary discussions with an engineering firm or architect to determine if existing space could be renovated to create single or double cells at the COJL.</td>
<td>PARTIALLY</td>
<td>There is not a plan designed beyond the current renovation which will accommodate the move.</td>
</tr>
<tr>
<td>HHA #</td>
<td>HHA Recommendation</td>
<td>Status of Implementation</td>
<td>Status/Justification/Next Steps</td>
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<td></td>
<td>Increasing the number of residents who could remain at the COJL would allow the DDC to have more space available to maintain the integrity of inmates’ housing classifications. Consider having the engineering firm or architect also evaluate the potential for converting the vacant buildings at the COJL, as well as the potential of constructing an additional building on the COJL property.</td>
<td>PARTIALLY</td>
<td>DDC does work together with the CDOC regarding the number of CDOC inmates the DDC holds. There is not a fund for potential housing expansion given the variability of space demand.</td>
</tr>
<tr>
<td>3.39</td>
<td>Re-evaluate allowing outside agencies like the CDOC to house inmates in DSD facilities or allow these agencies to house inmates temporarily, but with an understanding that the costs to do so would be increased and billed to these agencies to fund any potential DSD housing expansion.</td>
<td>PARTIALLY</td>
<td>DDC does work together with the CDOC regarding the number of CDOC inmates the DDC holds. There is not a fund for potential housing expansion given the variability of space demand.</td>
</tr>
<tr>
<td>3.40</td>
<td>Consider purchasing coats and gloves for inmates at the COJL to use during cold weather so they can use the designated space for recreation.</td>
<td>NOT</td>
<td>The frequency of inmates spending time outside is limited. The limited number of winter gear items currently maintained at the COJL is believed by DSD to be appropriate.</td>
</tr>
<tr>
<td>3.41</td>
<td>Purchase exercise videos and mats to increase the ability for inmates to perform large muscle exercise.</td>
<td>NOT</td>
<td>DSD meets the physical activity requirements required by the ACA and does not consider this recommendation worthy of adoption. If DSD decides to expand or change exercise options, the ACA has many resources DSD can consider.</td>
</tr>
<tr>
<td>3.42</td>
<td>Ensure DSD has an understanding of the legal landscape regarding inmate confinement and ensure that DSD policies are in compliance with legal standards.</td>
<td>COMPLETELY</td>
<td>The DSD has taken a number of steps, including increasing the post order legal review role played by its counsel, OJP Evaluation and upholding accreditations.</td>
</tr>
</tbody>
</table>
January 9, 2018

Auditor Timothy 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,

BKD, LLP (BKD) has assessed Denver Sheriff’s Department’s (DSD) implementation of recommendations from the 2015 Hillard Heintze Assessment (HHA). Specifically, BKD evaluated DSD’s implementation of 27 recommendations from the HHA regarding inmate intake and classification processes. This memorandum provides a written response for each reportable condition noted in BKD’s final draft report that was sent to us on December 20, 2017. This response complies with Section 20-276 (c) of the Denver Revised Municipal Code (D.R.M.C.).

FINDINGS

<table>
<thead>
<tr>
<th>RECOMMENDATION 3.16 (from the HHA)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Interview Redundancies</strong> – Revise Denver County Jail (DCJ) policies to eliminate the redundancy of the primary classification interview and the subsequent proxy interview required at the DCJ.</td>
</tr>
<tr>
<td><strong>BKD Finding</strong> – Based on the information collected, we assess the recommendation as completely implemented. The pre-classification interview, the primary classification interview and the subsequent proxy interview with the primary security assessment are all occurring at the DDC.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</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>Complete with ongoing monitoring</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>

Page 1 of 15
Narrative for Recommendation 3.16
The DSD is in full agreement with the BKD finding that HHA recommendation 3.16 has been completely implemented, and the department will continue monitoring to ensure continuous improvement.

RECOMMENDATION 3.17 (from the HHA)

Structured Classification Interview – Include in the classification process at the DDC a formal, structured, and meaningful interview process that provides valuable information to the facility and aids in the inmates’ housing and programmatic decisions. It should identify the inmates’ need, skills and interests and require the classification deputies to make recommendations regarding housing, work assignments and programs.

BKD Finding – Based on interviews and the information we collected, we assess this recommendation as mostly implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</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>DSD considers completely implemented as of 11/27/2017</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.17
The DSD considers the HHA recommendation 3.17 as completely implemented, effective 11/27/2017. With the BKD Assessment occurring several months ago, there has been significant progress made in implementation of reform efforts. The department is committed to ongoing monitoring to ensure continuous improvement.

RECOMMENDATION 3.18 (from the HHA)

Interview Training – Train classification deputies at the DDC to conduct more detained and in-depth interviews to obtain information on family members, residency, next of kin, criminal history, gang affiliation and conflict, mental health issues, drug history, medications, education, suicide attempts, mental health treatment, employment history and any prior incarcerations. Provide additional training for classification deputies on interviewing skills, body language and asking follow-up questions for answers that are vague or need further exploration.

BKD Finding – Based on the information collected, we assess the recommendation as partially implemented. Additional, relevant training in mental health recognition (administered to all DSD personnel) has been provided, but BKD was provided with no evidence of specialized training based on the specific interview techniques that can be utilized by classification officers. This is not to say that BKD found the classification
officers lacking in interview skills, just that the specifics of this recommend were not fully implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</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>DSD considers completely implemented as of 10/3/2017</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.18
The DSD considers the HHA recommendation 3.18 as completely implemented, effective 10/3/2017. With the BKD Assessment occurring several months ago, there has been significant progress made in implementation of reform efforts. The department is committed to ongoing monitoring to ensure continuous improvement.

RECOMMENDATION 3.19 (from the HHA)

**Housing Assignments upon Classification** – Revise facility policies to require classification deputies to assign inmates to specific pods within housing units based upon the information gathered during the intake interviews.

**BKD Finding** – Based on a review of the Inmate Classification Post Order, and the Intake Classification Officer Post Order, we assess this recommendation as completely implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</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>N/A</td>
<td>Sheriff Patrick Firman 720-337-0094</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.19
As part of the DSD Reform effort, the department, inclusive of legal advisement, identified 8 HHA recommendations related to the scope of this assessment that were considered and subsequently not advanced for implementation. This resulted in a justification statement that can be referenced as an addendum to this department response. See addendum 3.19 for further information.
RECOMMENDATION 3.20 (from the HHA)

Immediate Housing Transfers – Allow classification deputies who are aware of pertinent information regarding these decisions to re-classify inmates who request housing transfers due to conflicts with inmates or other factors, rather than a deputy or supervisor who may not be aware of important classification information.

BKD Finding – Based on the information collected, we assess this recommendation as completely implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</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>Complete with ongoing monitoring</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.20
The DSD is in full agreement with the BKD finding that HHA recommendation 3.20 has been completely implemented, and the department will continue monitoring to ensure continuous improvement.

RECOMMENDATION 3.21 (from the HHA)

Reinforcement of Authority – Clarify and emphasize the authority of the classification staff to make housing assignments.

BKD Finding – Based on the information collected, we assess this recommendation as mostly implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</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>DSD considers completely implemented as of 11/7/2017</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.21
The DSD considers the HHA recommendation 3.21 as completely implemented, effective 11/7/2017. With the BKD Assessment occurring several months ago, there has been significant progress made in the implementation of reform efforts. The department is committed to ongoing monitoring to ensure continuous improvement.
RECOMMENDATION 3.22 (from the HHA)

**Staff Efficiency** – Conduct a comprehensive time and task analysis of classification deputies to leverage valuable personnel resources more effectively.

**BKD Finding** – Based on the information collected, we assess this recommendation as partially implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</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>DSD considers completely implemented as of 1/30/2017</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>

**Narrative for Recommendation 3.22**
The DSD considers the HHA recommendation 3.22 as completely implemented, effective 1/30/2017. In early 2017, the department did not have formal resources in place to address analysis work, however, manual steps were taken to conduct an informal analysis, which included a workgroup that assessed areas of work, needs, and created recommendations for consideration. Based on the recommendations received, priorities were adopted that will be a part of the department’s commitment to ongoing monitoring to ensure continuous improvement.

RECOMMENDATION 3.23 (from the HHA)

**Classification Staffing** – Ensure that classification deputies are working when and where they need to. If it is not necessary to have a 24/7 presence at the DDC or DCJ, the staff working overnight should be reassigned to use personnel more efficiently and reduce overtime costs.

**BKD Finding** – Based on the information collected, we assess this recommendation as mostly implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Disagree</td>
<td>DSD considers completely implemented as of 8/23/2017</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>
Narrative for Recommendation 3.23
The DSD considers the HHA recommendation 3.23 as completely implemented, effective 8/23/2017. With the BKD Assessment occurring several months ago, there has been significant progress made in implementation of reform efforts. The department is committed to ongoing monitoring to ensure continuous improvement.

RECOMMENDATION 3.24 (from the HHA)

Rank and Pay – Consider creating an additional rank or providing specialty pay for all classification deputies, while increasing their accountability for accuracy and thoroughness of classification, because proper classification is one of the most important functions in the facility as it directly impacts the safety and security of all staff and inmates.

BKD Finding – Based on the information collected, we assess this recommendation as not implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</th>
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</thead>
<tbody>
<tr>
<td>Agree</td>
<td>N/A</td>
<td>Sheriff Patrick Firman 720-337-0094</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.24
As part of the DSD Reform effort, the department, inclusive of legal advisement, identified 8 HHA recommendations related to the scope of this assessment that were considered and subsequently not advanced for implementation. This resulted in a justification statement that can be referenced as an addendum to this department response. See addendum 3.24 for further information.

RECOMMENDATION 3.25 (from the HHA)

Validation – Contact the National Institute of Corrections (NIC) to request technical assistance to ensure that the classification system is validated, or examine other objective classification instruments that have already been validated as national best practice.

BKD Finding – Based on the information collected, we assess this recommendation as completely implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</th>
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</thead>
<tbody>
<tr>
<td>Agree</td>
<td>Complete with ongoing monitoring</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>
Narrative for Recommendation 3.25
The DSD is in full agreement with the BKD finding that HHA recommendation 3.25 has been completely implemented, and the department will continue monitoring to ensure continuous improvement.

RECOMMENDATION 3.26 (from the HHA)

**Formal Training** – Provide the pre-classification deputy in the intake process with formal training on the objective classification system, and have them report to the Classification Unit. The pre-classification deputy in the intake process could assign emergency housing on the overnight shifts.

**BKD Finding** – Based on the information collected, we assess this recommendation as partially implemented.

<table>
<thead>
<tr>
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</tr>
</thead>
<tbody>
<tr>
<td>Agree</td>
<td>2/28/2018</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.26
The DSD agrees that the HHA recommendation 3.26 has been partially implemented, and expects the full implementation to be complete by 2/28/2018, with ongoing monitoring to ensure continuous improvement.

RECOMMENDATION 3.27 (from the HHA)

**Reclassification** – Require the security sergeant to remove any inmate posing a threat by moving the inmate back to the classification area in the event of a fight, disturbance, or disorderly offender to protect the offenders and staff, prevent potential manipulation, or determine if the offender is acting out due to a threat.

**BKD Finding** – Based on the information collected, we assess this recommendation as partially implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</th>
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<tbody>
<tr>
<td>Disagree</td>
<td>N/A</td>
<td>Sheriff Patrick Firman 720-337-0094</td>
</tr>
</tbody>
</table>
Narrative for Recommendation 3.27
As part of the DSD Reform effort, the department, inclusive of legal advisement, identified 8 HHA recommendations related to the scope of this assessment that were considered and subsequently not advanced for implementation. This resulted in a justification statement that can be referenced as an addendum to this department response. See addendum 3.27 for further information.

<table>
<thead>
<tr>
<th>RECOMMENDATIONS 3.28 and 3.29 (from the HHA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Institutional Classification Committee (ICC) (3.28) – Combine the Administrative Review Board with the Classification Review Board into one body called the Institutional Classification Committee.</td>
</tr>
<tr>
<td>ICC Staffing and Scope of Review (3.29) – Staff the ICC with classification, medical, security, Gang Unit, and mental health employees, and ensure they meet daily to determine all new housing assignments and any internal moves or changes. Have the ICC review the status of inmates confined in segregation and special housing. Eliminate any administrative overrides as these decisions should fall to the ICC.</td>
</tr>
<tr>
<td>BKD Finding – Based on the information collected, we assess the above two recommendations as partially implemented.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</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>3.28 – Disagree</td>
<td>3.28 – N/A</td>
<td>3.28 – Sheriff Patrick Firman – 720-337-0094</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.28 and 3.29
As part of the DSD Reform effort, inclusive of legal advisement, the department identified 8 HHA recommendations related to the scope of this assessment that were considered and subsequently not advanced for implementation. This resulted in a justification statement that can be referenced as an addendum to this department response. See addendum 3.28 for further information.

The DSD agrees that the HHA recommendation 3.29 has been partially implemented, and expects the full implementation to be complete by 3/31/2018, with ongoing monitoring to ensure continuous improvement.
RECOMMENDATION 3.30 (from the HHA)

Transgender Classification Process – Update DCJ’s transgender classification and management process to include the January 2014 department order mandates that address classification.

BKD Finding – Based on the information collected, we assess this recommendation as completely implemented.

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Agree</td>
<td>Complete with ongoing monitoring</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.30

The DSD is in full agreement with the BKD finding that HHA recommendation 3.30 has been completely implemented, and the department will continue monitoring to ensure continuous improvement.

RECOMMENDATION 3.31, 3.32, and 3.33 (from the HHA)

Authorization (3.31) – Clarify and emphasize the authority of the classification staff to make all housing assignments, and require them to consider gang affiliation when determining where to house inmates.

Information Sharing (3.32) – Require classification deputies to incorporate questions on gang ranks and known associations in their intake interviews and share the information with the gang specialist at each facility. Establish a formal liaison process to ensure classification deputies are sharing information regarding inmates’ gang affiliations with members of the gang unit.

Use of Gang Intelligence (3.33) – Keep updated gang intelligence on inmates who should be kept separate from other inmates. Access to the gang intelligence file should be granted to the classification deputies.

BKD Finding – Based on the information collected, we assess the above three HHA recommendations related to the integration of gang-related information into the classification process (3.31, 3.32, and 3.33) as mostly implemented.

<table>
<thead>
<tr>
<th>Agree or Disagree with Finding</th>
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</table>

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Narrative for Recommendation 3.31, 3.32, and 3.33
The DSD considers the HHA recommendation 3.31, 3.32, and 3.33 as completely implemented, effective 8/20/2017. The department has considered the JMS impacts for this recommendation, and while the new JMS is currently in development, the department’s practice in capturing, storing, and sharing gang-related information is consistent with applicable guidelines. As noted in this report, the Classification Unit includes Gang Unit staff who provide a consistent and effective link between the two units, thus achieving the intent of this recommendation. With the BKD Assessment occurring several months ago, there has been significant progress made in implementation of reform efforts. The department is committed to ongoing monitoring and ensuring continuous improvement.

RECOMMENDATION 3.34 (from the HHA)

In-Person Interviews – Require classification deputies at the DDC and DCJ to conduct face-to-face interviews with inmates. Ensure the interviews include questions that allow deputies to document inmates’ needs and refer them to Department programs, either directly or by ensuring program staff actively recruits inmates to participate in programs. If the inmates’ needs have already been identified at the DDC, the DCJ could refer inmates to DCJ programs.

BKD Finding – Based on the information collected, we assess this recommendation as mostly implemented.

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Disagree</td>
<td>DSD considers completely implemented as of 11/15/2017</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.34
The DSD considers the HHA recommendation 3.34 as completely implemented, effective 11/15/2017. With the BKD Assessment occurring several months ago, there has been significant progress made in implementation of reform efforts. The department is committed to ongoing monitoring to ensure continuous improvement.
RECOMMENDATION 3.35 (from the HHA)

Program Referral – Distribute handouts to inmates that identify the many services and programs available to them. For example, if the inmate does not have a GED or high school diploma, classification deputies could refer the inmate to DSD’s in-house GED program. Or if an inmate is a parent and has substance abuse issues that led to the removal of children from the home, the inmate could be referred to substance abuse programs and parenting classes.

BKD Finding – Based on the information collected, we assess this recommendation as mostly implemented.

<table>
<thead>
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<tbody>
<tr>
<td>Agree</td>
<td>2/28/2018</td>
<td>Major Stephanie McManus 720-337-0139</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.35
The DSD agrees that the HHA recommendation 3.35 has been mostly implemented, and expects the full implementation to be complete by 2/28/2018, with ongoing monitoring to ensure continuous improvement.

RECOMMENDATION 3.36 (from the HHA)

Executive Review – Require Executive Staff to review the housing plans at both the DDC and DCJ.

BKD Finding – Based on the information collected, we assess this recommendation as completely implemented.

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<tr>
<td>Agree</td>
<td>Complete with ongoing monitoring</td>
<td>Sheriff Patrick Firman 720-337-0094</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.36
The DSD is in full agreement with the BKD finding that HHA recommendation 3.36 has been completely implemented, and the department will continue monitoring to ensure continuous improvement.
RECOMMENDATION 3.37 (from the HHA)

**Custody** – Consider having the CDOC assume custody of its inmates immediately or shortly after they are arrested to open space in its housing unit. Parole violation hearings could also be held at the CDOC, which could alleviate some of the housing issues DSD faces.

**BKD Finding** – Based on the information collected, we assess this recommendation as partially implemented.

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Disagree</td>
<td>N/A</td>
<td>Sheriff Patrick Firman 720-337-0094</td>
</tr>
</tbody>
</table>

**Narrative for Recommendation 3.37**
As part of the DSD Reform effort, inclusive of legal advisement, the department identified 8 HHA recommendations related to the scope of this assessment that were considered and subsequently not advanced for implementation. This resulted in a justification statement that can be referenced as an addendum to this department response. See addendum 3.37 for further information.

RECOMMENDATION 3.38 (from the HHA)

**Space Planning** – Consider launching preliminary discussions with an engineering firm or architect to determine if existing space could be renovated to create single or double cells at the DCJ. Increasing the number residents who could remain at the DCJ would allow the DDC to have more space available to maintain the integrity of inmates’ housing classifications. Consider having the engineering firm or architect also evaluate the potential for converting the vacant buildings at the DCJ, as well as the potential of constructing an additional building of the DCJ property.

**BKD Finding** – Based on the information collected, we assess this recommendation as partially implemented.

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<thead>
<tr>
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<tbody>
<tr>
<td>Disagree</td>
<td>DSD considers completely implemented as of 4/28/2016</td>
<td>Sheriff Patrick Firman 720-337-0094</td>
</tr>
</tbody>
</table>
Narrative for Recommendation 3.38
The DSD disagrees with the BKD finding of HHA 3.38. The oversight structure is in place for this recommendation and is considered completely implemented as of 4/28/2016, with the department’s master planning process and ongoing monitoring for continuous improvement.

RECOMMENDATION 3.39 (from the HHA)

Cost Recovery – Re-evaluate allowing outside agencies like the CDOC to house inmates in DSD facilities or allow these agencies to house inmates temporarily, but with an understanding that the costs to do so would be increased and billed to these agencies to fund any potential DSD housing expansion.

BKD Finding – Based on the information collected, we assess this recommendation as partially implemented.

<table>
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<tr>
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<tr>
<td>Disagree</td>
<td>N/A</td>
<td>Sheriff Patrick Firman 720-337-0094</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.39
As part of the DSD Reform effort, inclusive of legal advisement, the department identified 8 HHA recommendations related to the scope of this assessment that were considered and subsequently not advanced for implementation. This resulted in a justification statement that can be referenced as an addendum to this department response. See addendum 3.39 for further information.

RECOMMENDATION 3.40 (from the HHA)

Winter Wear – Consider purchasing coats and gloves for inmates at the DCJ to use during cold weather so they can use the designated space for recreation.

BKD Finding – Based on the information collected, we assess this recommendation as not implemented.

<table>
<thead>
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<tr>
<td>Agree</td>
<td>N/A</td>
<td>Sheriff Patrick Firman 720-337-0094</td>
</tr>
</tbody>
</table>
Narrative for Recommendation 3.40
As part of the DSD Reform effort, inclusive of legal advisement, the department identified 8 HHA recommendations related to the scope of this assessment that were considered and subsequently not advanced for implementation. This resulted in a justification statement that can be referenced as an addendum to this department response. See addendum 3.40 for further information.

RECOMMENDATION 3.41 (from the HHA)

Exercise Videos – Purchase exercise videos and mats to increase the ability for inmates to perform large muscle exercise.

BKD Finding – Based on the information collected, we assess this recommendation as not implemented.

<table>
<thead>
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<tbody>
<tr>
<td>Agree</td>
<td>N/A</td>
<td>Sheriff Patrick Firman 720-337-0094</td>
</tr>
</tbody>
</table>

Narrative for Recommendation 3.41
As part of the DSD Reform effort, inclusive of legal advisement, the department identified 8 HHA recommendations related to the scope of this assessment that were considered and subsequently not advanced for implementation. This resulted in a justification statement that can be referenced as an addendum to this department response. See addendum 3.41 for further information.

RECOMMENDATION 3.42 (from the HHA)

Legal Review – Ensure DSD has an understanding of the legal landscape regarding inmate confinement, and ensure the DSD policies are in compliance with legal standards.

BKD Finding – Based on the information collected, we assess this recommendation as completely implemented.

<table>
<thead>
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</thead>
<tbody>
<tr>
<td>Agree</td>
<td>Complete with ongoing monitoring</td>
<td>Chad Sublet, Department of Safety Senior Counsel 720-913-8065</td>
</tr>
</tbody>
</table>
**Narrative for Recommendation 3.42**

The DSD is in full agreement with the BKD finding that HHA recommendation 3.42 has been completely implemented, and the department will continue monitoring to ensure continuous improvement.

Please contact Andrea Albo at 720-337-0283 with any questions.

Sincerely,

Patrick Firman, Sheriff

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cc: Valerie Walling, Deputy Auditor, CPA, CMC
Katja Freeman, Audit Manager, MA, MELP
LaKeshia Allen Horner, Audit Supervisor, MPA