

August 11, 2021

Attn: Board of Public Health & Environment
101 W Colfax Ave, Suite 800
Denver, CO 80202
bphe@denvergov.org

Re: Board questions and answers regarding efforts around homelessness in Denver

I am writing to submit comment on a letter Denver Department of Public Health and Environment (DDPHE) issued to the Board of Public Health & Environment (BPHE) in which DDPHE responded to unresolved discussion from the BPHE meeting on April 8, 2021. DDPHE's letter to the board was titled "Board questions and answers regarding efforts around homelessness in Denver." I believe this letter to the board is an incomplete evaluation of the public health response to unsheltered homelessness in Denver. Additionally, I believe the City and County of Denver's public health response has been inadequate to effectively and sustainably address health concerns facing persons experiencing homelessness (PEH) in Denver.

I currently work in public health in Denver on issues impacting persons experiencing homelessness. I have a background in social work and mental health treatment in Colorado, and health programming in refugee settings abroad. I have routinely attended sweeps of encampments over the last two years and have discussed my concerns respectfully with DDPHE and Denver Police Department (DPD) personnel on the ground in addition to submitting a separate letter to the DDPHE Public Health Investigations division last year. I am writing to the board as a concerned citizen and public health professional.

I wish to raise concerns that: 1) The City and County of Denver is lacking critical preventive health strategies in addressing encampments; 2) Area restrictions are often the first step taken to address health issues in encampments; and 3) City and County agencies and leadership lack productive community and stakeholder engagement in addressing homelessness.

I raise these issues in an effort to encourage strategic change within the City and County of Denver and DDPHE. My hope is that DDPHE could be a positive catalyst for change in the way we address persons experiencing homelessness by leading improvement in practices that are harmful to some of Denver's most vulnerable residents.

1) The City and County of Denver is lacking critical preventive health strategies in addressing encampments

A major concern to me about the City and County's strategy on homelessness is the lack of preventive health interventions for foreseeable and reoccurring health issues within Denver. Water, sanitation, and hygiene are at the top of this list with an absence of efforts to address the unavoidable open defecation and urination that occurs from a lack of bathroom facilities and water access. When COVID-19 mitigation strategies resulted in a loss of access to facilities with public buildings closing around Denver, handwashing stations were distributed by DDPHE, though these were temporary and minimal. Local grassroots organizations appeared more effective in providing clean water to encampments during this time. No noticeable effort was made to address the loss of bathroom access, which was already extremely limited pre-pandemic. Lack of strategy around facilities likely exacerbated an outbreak of the diarrheal disease Shigellosis among PEH in 2020, which had similar severity to the 2019 Hepatitis A outbreak. Services described by DDPHE in their letter to the board such as Wellness Winnie support, behavioral health outreach, disease metrics, and

access restrictions are not effective replacements for the basic human needs of water, sanitation, and hygiene.

Suggestions:

- Address unmet water, sanitation, and hygiene needs within the Denver by commissioning more portable toilets, hand washing stations, and water points
- Provide adequate means and strategies for waste management at encampments.
- Participate in advocacy with other City and County agencies and leadership in authorizing the above resources/services to reduce service gaps that result in conditions where open defecation/urination is the only viable option for residents.

2) Area restrictions are often the first step taken to address health issues in encampments

An area that I have witnessed DDPHE being heavily involved in through my own observation and in speaking with camp residents is through enforcement of area restrictions upon encampments which result in expediting the displacement of individuals surviving in encampments. These restrictions are most often posted without prior effort to support the environmental health of encampments. This enforcement approach has contributed to a loss of trust in local public health and an adversarial relationship developing between those directly impacted by DDPHE's practices and their advocates with the agency. Leaving public health concerns unaddressed until the point of displacement is contrary to the goals of preventive public health. While other City and County agencies and leadership are also responsible for commissioning sweeps, I believe DDPHE has a duty to engage in preventive public health measures. Neglect causes harm amplification. DDPHE's chartered responsibility to "keep Denver clean, safe, and free of hazards that cause harm," as referenced in their letter to the board, is incomplete without assisting residents in maintaining an environment in which their health is most impacted.

Suggestions:

- It appears there are local policies that do not allow for the provision of certain basic resources to encampments or taking actions that appear to condone urban camping. Discontinue or advocate for the discontinuation of these policies.
- Make efforts to communicate with and assist encampments in maintaining environmental health before determining there is an imminent public health concern

3) City and County agencies and leadership lack productive community and stakeholder engagement in addressing homelessness

DDPHE has the challenging position of balancing the health, safety, and wellbeing of all Denver residents. While a unified approach across City and County agencies is valuable, I would expect to see greater advocacy for health equity and community engagement from our public health representatives. It is unclear how DDPHE, City and County agencies, and leadership engage the community and utilize feedback to inform local policies and strategy. While the City holds quarterly meetings with unsheltered residents of Denver in pursuant with the 2019 settlement agreement of *Lyall et al v. City of Denver*, issues of sanitation as well as harmful practices during sweeps are raised each meeting, though these issues appear resistant to change.

Additionally, DDPHE noted in their letter to the board that they consult multi-agency groups and discuss strategy prior to sweeps. I believe that this phrasing is misleading, with some of the groups listed and local leaders being strongly opposed to DDPHE and the City and County's response to homelessness. The loss of personal belongings, medications, and stability along with the

service-related trauma that can occur with the sweeps are not aligned with hard-fought paths to exit homelessness.

Suggestions:

- DDPHE should re-communicate with the multi-agency leadership groups referenced in their letter to the board and seek guidance around strategies to support the health and safety of those living in encampments and the greater community
- DDPHE, City and County agencies, and leadership should apply feedback and implement strategic change through engagement of those with lived experience of homelessness, service providers, and community members at open community events

Sincerely,

Thomas Gray, MSW, MPH