

## Our Commitment to Transparency and Accountability

In 2025, the Denver Auditor’s Office conducted an independent audit of the Caring for Denver Foundation. The audit resulted in recommendations to strengthen our internal policies, procedures, and practices. This memo is a public record of the actions we have taken in response to the recommendations we accepted.

We are committed to continuous improvement and take the Auditor’s findings seriously. This page will be updated as additional recommendations are completed.

<h1>8</h1> <p>Accepted Recommendations</p>	<h1>5</h1> <p>Completed</p>	<h1>3</h1> <p>In Progress</p>
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### Section 1: Financial Accountability

<p><b>Rec. 1.2</b> <b>Expense Reimbursement Policies</b> <i>Recommended: Revise employee reimbursement policies and procedures to require itemized receipts, names and affiliations of attendees, business purpose descriptions, per diem guidance, and preapproval requirements.</i></p>	<p><b>COMPLETE</b> Completed March 11, 2026</p> <p><b>Action Taken:</b> The Finance Committee approved a revised Credit Card and Personal Expense Reimbursement Procedure on March 11, 2026. The Board was informed on March 16, 2026, and the updated procedure was distributed to all staff on March 23, 2026.</p>
<p><b>Rec. 1.3</b> <b>Expense Review Policies</b> <i>Recommended: Develop, document, and implement policies for reviewing and approving expense reimbursements, including reviewer responsibilities, documentation standards, and processes for insufficient documentation.</i></p>	<p><b>COMPLETE</b> Completed March 23, 2026</p> <p><b>Action Taken:</b> In addition to the revised Credit Card and Personal Expense Reimbursement Procedure, four updated Accounts Payable procedure documents were finalized on March 23, 2026. All documents were shared with the Board Treasurer and finance partners.</p>

## Section 3: Governance and Conflict of Interest

### Rec. 3.1

#### Conflict-of-Interest Form Due Dates

*Recommended: Formalize the January 31 submission due date for conflict-of-interest and outside employment forms in policies and procedures, with documented consequences for noncompliance.*

#### COMPLETE

Completed April 20, 2026

#### Action Taken:

A revised Conflict of Interest Policy formalizing deadlines with staff and board consequences for noncompliance was approved by the Board in April 2026. The Outside Employment Form has been updated.

### Rec. 3.2

#### Conflict-of-Interest Communication

*Recommended: Communicate the January 31 submission due date to all staff and board members.*

#### COMPLETE

Completed April 20, 2026

#### Action Taken:

Deadlines are communicated through the updated Conflict of Interest Policy approved by the Board in April 2026 as well as ongoing staff and board communications. Administrative Calendar has been updated.

### Rec. 3.3

#### Conflict-of-Interest Tracking and Enforcement

*Recommended: Establish a tracking method for form submission and enforce compliance with conflict-of-interest and outside employment form policies.*

#### COMPLETE

Completed April 10, 2026

#### Action Taken:

A tracking spreadsheet for annual form collection has been established, with calendar reminders added. Written procedures now cover how required forms are collected and filed and how conflicts of interest are handled during grant and contract review.

## Section 2: Grantmaking Practices

### Rec. 2.2

#### Due Diligence Policies and Procedures

*Recommended: Develop, document, and consistently implement policies and procedures for conducting due diligence of all grantees, including staff responsibilities, documentation standards, review checklists, and protocols for handling findings.*

#### IN PROGRESS

Due August 31, 2026

#### Action Taken:

Work is underway to enhance the Grant Procedures document and Program Officer Playbook to detail staff responsibilities, documentation standards, review checklists, and corrective action protocols.

### Rec. 2.3

#### Due Diligence Training

*Recommended: Develop and provide training to staff responsible for conducting due diligence reviews, with documented attendance records.*

#### IN PROGRESS

Due August 31, 2026

#### Action Taken:

A Due Diligence Training Plan is being developed. The Orientation Checklist and Administrative Calendar are being updated to include annual due diligence training. A Training Log will capture dates, topics, and attendees.

**Rec. 2.7**

**Grant Compliance Enforcement**

*Recommended: Enforce all grant requirements in end-of-project monitoring and develop and communicate consequences of noncompliance, such as repayment or future ineligibility.*

**IN PROGRESS**

Due August 31, 2026

**Action Taken:**

Work is underway to document the report review process, update end-of-grant-year reporting requirements, and incorporate consequences of noncompliance into policies and procedures and applicant-facing communications.