

Variance & Mitigation Framework

Describe in detail the county's existing mitigation framework and triggers defined in your approved variance(s). This should include the metrics used by CDPHE to monitor for variance threshold compliance.

Existing Mitigation Framework

The City of Denver is working towards numerous goals through its Recovery Plan to address COVID mitigation in Denver. These goals focus on limiting transmission, addressing the needs of disproportionately impacted populations, and working towards an end to the local outbreak while supporting the economy and balancing other public health considerations.

Denver's Goals include:

- Timely review of disease trends to ensure strategic resource investments and controls
- Prioritizing widespread testing access with a focus on most vulnerable populations
- Ensuring a high level of compliance through effective education, interventions and enforcement
- Reducing disparities across populations through ongoing analysis of disease trends and strategic investment of resources
- Reducing virus transmission in Denver and regionally, and work towards an end to the epidemic

Additional information about these goals is included in the Community Goals section.

Variance Threshold Metrics (grouped by Threshold Metric/Snapback Provision):

Variance	Threshold Metric/Snapback Provision	Status
Denver Botanic Gardens	2 or more cases tied to DBG	No known cases or outbreaks tied to DBG as of 7/19
Denver Zoo	2 or more cases tied to Zoo	No cases or outbreaks tied to zoo as of 7/19
*Museums, Restaurants, Cherry Creek Mall, Gyms, Pools, WSSA Horse Shows	-718 cases in a 2-week period -A sustained decrease in number of new cases over the last 14 days; -Rates of hospitalization continue to decrease over the last 14 days -Rates of death continue to decrease over the last 14 days -Testing is available for all people who have symptoms and close contacts of cases; -Public Health continues to investigate	~952 cases in last two weeks for which data is available (936 if congregant residential cases are excluded). See Denver COVID-19 Data Summary . No known cases tied to museums, Cherry Creek Mall, gyms, pools, horse shows. Rates of hospitalization and deaths remain low over last two weeks. Testing is widely available through a variety of mechanisms. Public Health attempts contact with all cases within 48 hours and all close contacts within 24 hours. Denver is investigating the risk posed by interactions at restaurants and bars after several clusters and/or outbreaks have been identified and will propose targeted interventions.

	<p>all cases within 48 hours of notification</p> <p>-Public Health outreach to close contacts is conducted within 24 hours</p> <p>-Absence of outbreaks in settings to which the variance applies.</p>	
<p>CDPHE High “Viral Spread” Status Criteria, enabling eligibility for ongoing variance approval</p>	<p>Stable or declining average hospitalizations for the last 14 days;</p> <p>For counties with high rate of testing, a positivity rate less than 15%</p>	<p>Denver has stable and low hospitalization rates over the last 14 days;</p> <p>While the positivity rate has increased slightly from June to July, it has consistently remained at or below 5% with an average test daily test administration over 1100.</p>

** Denver’s Third Variance allows museums, Four Mile Park, restaurants, gyms, recreation centers and indoor pools to operate indoor spaces at 50% posted occupancy code not to exceed more than 50 people in a confined indoor space, and not to exceed 125 in an outdoor space. It also allows The Cherry Creek Mall to operate the indoor common areas (such that no gatherings are occurring and instead customers are moving from one destination to the next) and allows the indoor retail at Cherry Creek Mall to admit into each confined indoor space 50% occupancy.*

Because Denver already falls within CDPHE’s “High Status of Virus Spread” category, Denver proposes closely investigating and analyzing transmission data over the next two weeks, both at population and case level, so that targeted restrictions can be proposed to CDPHE. While the appropriate response may be the rescission of some or all variances, Denver wants to ensure the controls are strategic and appropriate while facilitating economic recovery to the degree possible.

Accordingly, DDPHE proposes that by 8/3/20, our team will provide an update to CDPHE with observations derived from complaint response, compliance checks, enhanced case data collection addressing transmission, setting trends, and epidemiological analysis. The update will identify proposed targeted responsive controls. This approach balances economic and non-COVID public health factors so that restrictions are effective and implemented where needed.

Community Goals

Describe in detail the overall community goals for COVID-19, and any and all response efforts that have been implemented to date.

Please see a summary of key goals below; Denver’s Recovery Plan is included as an addendum and provides additional information about all community goals, including those that are not directly related to reducing transmission and controlling the outbreak.

- Goal 1: Timely review of disease trends to ensure strategic resource investments and controls
 - Work closely with State and regional partners to analyze geographical and population-level trends
 - Share metrics and local status through an easily accessible platform

- Seek opportunities to increase population-based data quality, such as partnering on CDC and other studies
- Respond quickly to address resource needs reflected through transmission and case interview trends
- Goal 2: Provide widespread testing access, with focus on most vulnerable people and populations (people of color, people of advanced age, and people who live in congregant settings)
 - Established free drive-up testing available to all, including people who reside outside of Denver
 - Created mobile testing team to serve the home-bound and others who cannot access public testing opportunities
 - Built a robust “pop-up” community testing effort in partnership with community-based organizations to meet people where they are
 - Provide recurring testing for clients and staff at congregant residential facilities, including jails, community corrections, overnight shelters, and long-term care facilities
 - Provide testing at site of employment-based outbreaks and other settings
 - Focus on minimizing resulting time and supporting effective medical follow up
 - Reduce barriers towards for testing, such as requirement to have an official government ID
- Goal 3: Ensure a high level of compliance with public health orders through effective use of education, interventions and enforcement
 - Use strategic and effective methods to educate communities, including text alerts, social media campaigns, and earned media
 - Denver proactively issues public health orders to control local disease trends and address community needs
 - Respond to every complaint, including anonymous complaints to the extent possible
 - Orders are issued to employers after a single employee case is identified
 - Ongoing compliance and enforcement efforts are tracked and reported to identify “hot spots” and trends to best target efforts
 - Proactive monitoring for compliance and address noncompliance through education and effective enforcement
 - Identify barriers to compliance and use a health equity approach to prioritize investment of resources
 - **Most recent metrics from Denver enforcement teams:**
 - July 16 - Daily enforcement activity under "Safer-at-Home" order:**
 Contacts: 33; Mask-related contacts only: 19
 Warnings: 33; Mask-related warnings only: 19
 Citations: 0
 - Ongoing cumulative enforcement activity under "Safer-at-Home" order:**
 Total Contacts to-date: 13,509; Mask-related contacts only: 930
 Warnings to-date: 12,041; Mask-related warnings only: 699
 Citations to-date: 5

- Goal 4: Reduce disparities across populations through ongoing analysis of disease trends and strategic investment of resources
 - Provide recurring testing for clients and employees in congregant residential facilities and other settings serving vulnerable populations
 - Partner with community-based organizations to provide testing and communication with vulnerable populations
 - Work with Mayor Hancock’s Racial Equity Council to identify effective investment of resources to minimize disparities
 - Frequently evaluate race and ethnicity population level data to understand, forecast, and respond to outbreak trends

- Goal 5: Reduce virus transmission in Denver and regionally and work towards an end to the epidemic
 - Implement interventions, such as testing and targeted promotion of medical resources, where highest risks/greatest evidence of transmission occur
 - Ensure ongoing effective and quick turn-around case management and contact tracing
 - Detect and respond in a timely fashion to outbreaks with the implementation of effective interventions
 - Consider additional targeted restrictions that address transmission and are informed by disease trends while balancing controls with economic and non-COVID public health considerations
 - Increase access to resources needed for effective isolation and quarantines

Current Outbreak and Response Trends

- See the Variance Thresholds Matrix above
- Current disease trends are posted by Denver Public Health and DDPHE here: <https://storymaps.arcgis.com/stories/50dbb5e7dfb6495292b71b7d8df56d0a>
- The 7-day average per 100,000 people doubled in the last month (June 17th to July 17th)
- Hospitalizations are showing a slight increase from June to July but are at steady levels over the last 2 weeks
- Mortality rate has steadily decreased (June to July)
- Contact is attempted with all cases within 48 hours
- Contact is attempted with all close contacts of cases within 24 hours
- The positivity rate has increased slightly from June to July, but it has consistently remained at or below 5%. Because Denver administers a high number of tests each day, it is eligible to consider a positivity rate below 15% as qualifying our jurisdiction to remain in the “High Status of Spread” category and therefore eligible to retain variances.

Mitigation Steps

Mitigation steps should define the individual components of the LPHAs mitigation strategy, including but not limited to community partnerships, increased isolation and quarantine capacities, and communication plans. Each step should include as much detail as possible regarding process and actions, relevant stakeholders, and applicable timeframes.

Denver will continue to refine strategies used to meet the community goals outlined above, including the following specific refined strategies, listed by Goal below:

Goal 1: Timely review of disease trends to ensure strategic resource investments and controls

- Continue to monitor disease trends and outbreak curve forecasts to provide targeted and effective transmission controls
- Modify case interviews to collect additional detailed information about transmission settings, including whether settings are addressed in variances
- Continue to communicate with regional, State and other partners to understand emerging science about transmission trends
- By 8/3, identify any additional restrictions needed based on transmission trends

Goal 2: Provide widespread testing access, with focus on most vulnerable people and populations (people of color, older people, and people who live in congregant settings)

- Continue work with community-based organizations and service providers supporting vulnerable populations to schedule additional testing events, including recurring events in partnership with community-based organizations
- Continue to evaluate employees and others that may need recurring testing to prevent outbreaks
- Continue to investigate the effective implementation of antibody testing and how that may impact other testing and disease control strategies
- Continue to provide outbreak setting testing as needed
- Flag vulnerable testing events for CDPHE lab to reduce resulting time
- Evaluate testing event settings with very low positivity rates to redirect testing events to higher priority settings
- Continue to work towards rapid turnaround testing and communication processes

Goal 3: Ensure a high level of compliance with public health orders through effective use of education, interventions and enforcement

- DDPHE will issue a revised Face Covering Order (FCO) on 7/21/20 continuing to mandate face coverings on children 3 and older, and requiring all owners, operators, or managers of public indoor spaces in Denver to post signs in a conspicuous place at every public entrance to the facility. Signs must be clearly visible to the public and must use the DDPHE template in a size not less than 11 inches wide and 14 inches in height. Operators will be responsible for excluding those not in compliance from their facilities.
- A publicity campaign to include web and social media implemented to communicate with the public about enhanced enforcement and ongoing case and outbreak trends will kick off in sync with enforcement effort.
- DDPHE is partnering with law enforcement to enhance compliance and enforcement efforts starting week of 7/20 by providing additional staffing for response and coverage in evenings to evaluate compliance of high-risk social settings and those addressed in the variances
- Businesses will be ticketed if an employee does not wear a face covering or if 10% of customers are not wearing face coverings
- Bars and Restaurants will be ticketed and closed if individual parties are not clearly separated by the required spacing or customers are not wearing face coverings as required
- Start this effort Tuesday, 7/21, until further notice, initially responding to complaints, building capacity to general monitoring. Focus will be on retail businesses, bars, event spaces, restaurants, and other settings addressed in variances.

- A stricter signage requirement will be established in Denver through a revised Public Health Order. Public settings and businesses will be required to post the signage at all public entrances.
- Evaluating whether any high-risk loopholes need to be addressed in Public Health Order revisions, e.g. bar settings
- By 8/3, identify any additional restrictions needed, based on compliance and enforcement trends

Goal 4: Reduce disparities across populations through ongoing analysis of disease trends and strategic investment of resources

- Continue work with local and regional organizations to collect and respond to information about community needs
- Continue to hone case management and contact tracing strategies so that they are culturally appropriate
- Strategies such as access to motel rooms, access to social worker case managers, referrals to safety-net medical providers, and food resources are being developed for COVID-positive individuals and high-risk contacts during isolation and quarantine periods.
- By 8/3, identify any additional measures needed to control transmission in the context of health disparities and health equity

Goal 5: Reduce virus transmission in Denver and regionally and work towards an end to the epidemic

- Continue to partner with School of Public Health and other academic partners; Metro Denver Partnership for Health, CDPHE, CDC, and community-based organizations to evaluate disease trends
- Continue to require face coverings for children 3 years old and older in public settings.
- Modify case interviews to collect additional detailed information about transmission settings, including whether settings are addressed in variances
- Continue to refine processes for obtaining information regarding cases and close contacts for quarantine and isolation orders, as well as contact tracing
- Build programs to provide additional resources that address barriers to people for isolation and quarantining
- By 8/3, identify any additional restrictions needed based on transmission trends.

Rollback

- By 8/3/20, DDPHE will update CDPHE on key metrics and propose appropriate targeted restrictions, potentially including variance limitations, additional public health orders, and other control measures

Timeline

This section should include a comprehensive list of dates and corresponding actions that demonstrate a clear timeline for mitigation, including future dates and actions. Please include as much detail as possible.

7/20/20	Report relevant metrics to CDPHE
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7/21/20	<i>Implement revised case interview processes to obtain additional information about transmission settings</i>
7/21/20	<i>Initiate increased compliance/enforcement effort</i>
Ongoing	<i>Closely monitor disease transmission trends/settings</i>
8/3/20	<i>Detailed evaluation and reporting of impacts/efficacy of mitigation plan as well as proposed additional mitigation measures</i>

Guide for Mitigation Process

