

Reference #
16781180



DENVER CITY COUNCIL

I am giving testimony on / Tema sobre el que le gustaría comentar

26-1190: Classification Notice #1897 from the Office of Human Resources. / 26-1190: Aviso de Clasificación n.º 1897 de la Oficina de Recursos Humanos.

First Name / Nombre

Travis

Last Name / Apellido

Krabbenhof

I am a resident of: / Soy residente del:

I am / Estoy

For the item / a favor del artículo

My testimony: / Mi testimonio:

Members of the Committee,

I am writing as Director of Airport Safety at Denver International Airport (DEN) regarding the ongoing Safety & Industrial Hygiene classification and Fair Labor Standards Act (FLSA) review before the City and County of Denver.

I would first like to acknowledge the significant work completed by the Office of Human Resources, Classification and Compensation, Human Resources Business Partners, and the City Attorney's Office. Based on the information presented to DEN leadership and the review conducted over the past two years, this evaluation has been thorough, deliberate, and rooted in operational observation and legal analysis.

OHR conducted extensive job shadowing and factual review, including dozens of employee observations and hundreds of hours reviewing actual work. The City Attorney's Office also conducted legal review regarding FLSA compliance and exemption status.

The current DEN Safety organization was established approximately three years ago as DEN expanded its enterprise-wide safety efforts, including Occupational Safety, Industrial Hygiene, Construction Safety risk analysis and acceptance, Driver Education, and Safety Management Systems (SMS) under FAA Part 139 Subpart E.

During this growth, concerns arose regarding classification consistency and pay equity between DEN Safety personnel and related safety positions across the City, including positions performing narrower or more specialized work. Questions emerged regarding why DEN Construction Safety personnel were classified at the Safety Administrator level while DEN Safety personnel, who maintain enterprise-wide responsibility and can solely accept risk in the medium-risk category of our risk matrix, were primarily classified at lower levels despite broader operational responsibilities.

Unlike construction-focused safety positions that primarily oversee contractor activities, DEN Safety personnel are responsible for the overall safety culture and operational safety of one of the busiest airports in the world. This includes interaction with airlines, tenants, concessionaires, contractors, City employees, emergency responders, and the traveling public. DEN Safety personnel routinely support emergencies, operational disruptions, construction, incident investigations, snow operations, FAA compliance, and enterprise risk management on a 24-hour operational schedule.

In May 2024, DEN formally requested that Classification and Compensation evaluate whether these employees were being classified and compensated fairly and equitably based on the work performed. The process has now remained ongoing for more than two years.

While employees have differing opinions regarding exempt versus non-exempt status, the primary concern consistently expressed by my team has not been whether employees are salaried or hourly. Rather, it has been whether employees are compensated fairly, equitably, and consistently for the work they perform.

The duration of this process has created hardship for employees and their families. If employees have been under-classified or improperly exempted, that condition has potentially existed for more than two years while the review remained unresolved. The impacts are not merely administrative; they affect quality of life, retirement calculations, overtime eligibility, financial planning, and family stability.

This is especially meaningful for employees nearing retirement eligibility. Some are at or near the end of their careers and may not realistically have another three years following implementation to benefit from adjustments affecting "highest three-year" retirement calculations. These employees have dedicated significant portions of their careers to public service and airport safety, and the timing of resolution matters greatly.

DEN Safety has, at times, unfortunately been portrayed as the “bad actor” or source of conflict in this process, including a belief by some that DEN Safety pushed for an hourly classification. I do not believe that characterization is fair or accurate. DEN Safety did not seek to disrupt the process or create division. We asked a legitimate question regarding equitable classification and compensation for employees performing increasingly complex operational and regulatory safety functions. DEN Safety leadership and employees have remained patient, professional, and respectful while allowing OHR and the City Attorney’s Office to complete their work.

DEN Safety supports whatever outcome is ultimately determined to be legally and operationally appropriate for the City and County of Denver. If the legally supportable path is to move positions to non-exempt status, we support that recommendation. If adjustments to classifications or compensation structures are necessary, we support those as well. We are City employees and will continue to support decisions made through the established City process. Importantly, Denver Legal has indicated that moving many of these positions to non-exempt status is the appropriate path to reduce risk and ensure compliance with applicable FLSA standards. Based on the information presented, we support the City’s efforts to align classifications and exemption status appropriately and consistently.

I respectfully encourage the Career Service Board and City leadership to continue evaluating broader questions of compensation equity and classification alignment for safety professionals across the City. DEN Safety has evolved dramatically in complexity and responsibility, and ensuring these employees are compensated fairly and appropriately remains important for retention, morale, recruitment, operational continuity, and long-term organizational stability. Thank you for your time, consideration, and service throughout this process.

Respectfully,

Travis Krabbenhoft

Denver International Airport

Finish Time

2026-08-14 15:49:03

Reference #
16786359



DENVER CITY COUNCIL

I am giving testimony on / Tema sobre el que le gustaría comentar

26-1190: Classification Notice #1897 from the Office of Human Resources. / 26-1190: Aviso de Clasificación n.º 1897 de la Oficina de Recursos Humanos.

First Name / Nombre

Greg

Last Name / Apellido

Kirschenman

I am a resident of: / Soy residente del:

I am / Estoy

Against the item / en contra del artículo

My testimony: / Mi testimonio:

Written Testimony Regarding Item 26-1190

Classification Notice Number 1897

Governance and Intergovernmental Relations Committee

August 18, 2026

Chair Sawyer and Members of the Committee:

My name is Greg Kirschenman, and I am a current Safety and Industrial Hygiene Administrator with nearly 31 years of service to the City and County of Denver.

I understand that the Career Service Authority conducted questionnaires, interviews, job shadowing, and other analysis as part of this classification study. My concern is not simply

whether those procedural steps occurred. My concern is whether the conclusion reached accurately reflects how qualifications are recognized within the safety profession and across the broader employment market.

Education and professional certifications are valuable and may be appropriate qualifications for higher-level safety positions. However, they are not the only accepted measures of professional-level competency.

Safety and industrial hygiene professionals frequently enter and advance within the field through different combinations of education, technical training, certifications, and progressively responsible experience. Many public-sector employers expressly allow an equivalent combination of education and relevant experience when filling professional and managerial safety positions.

Federal occupational information also recognizes that, although most occupational health and safety specialist positions require a bachelor's degree, some do not. It further recognizes that a considerable amount of work-related skill, knowledge, and experience is necessary for the occupation.

The Board of Certified Safety Professionals also recognizes more than one professional pathway. Its Safety Management Specialist credential is designed for experienced professionals who manage safety, health, and environmental programs. That credential places substantial weight on professional experience and does not require a college degree.

These examples do not suggest that education and certifications are unimportant. They demonstrate that there is no single, universal industry standard under which an experienced safety professional must possess a particular degree or certification for the work to be recognized as professional-level.

The City has relied on the knowledge, judgment, and demonstrated ability of the affected employees for many years. Their experience has not changed, their responsibilities have not suddenly become less complex, and the professional judgment required to perform their work has not disappeared.

The central issue is therefore not simply whether CSA completed its study. The issue is whether the study gave appropriate weight to an established industry practice: recognizing extensive, directly related experience as an equivalent professional qualification.

If CSA concluded that education or certification should outweigh many years of successful professional experience, the committee should ask what external market evidence supports that conclusion. Which comparable public employers were reviewed? How many accept equivalent experience? Were employers that use more flexible qualification standards considered? Why was one qualification model selected over other recognized approaches within the profession?

I also remain concerned about the effect on the 12 current employees identified for reallocation. Even if an equity review was conducted, the committee should understand its

findings. Did the review identify any disproportionate effect on older employees or another protected group, and can aggregate, de-identified results be provided?

A completed process does not necessarily establish that the resulting conclusion is correct.

Before changing the status of experienced current employees, the City should be able to demonstrate that its approach reflects the broader safety profession and not an unnecessarily narrow interpretation of professional qualifications.

For these reasons, I respectfully ask the committee to vote no on Item 26-1190 and Classification Notice Number 1897. At a minimum, the matter should be postponed until the City provides its external market comparisons and explains why extensive professional experience was not treated as an equivalent qualification.

Thank you for your time and consideration.

Greg Kirschenman

Safety and Industrial Hygiene Administrator

City and County of Denver

Finish Time

2026-08-18 07:45:21

Hello City Council Members,

I have been following and participating in the progress of the classification notice 1897.

I believe its pertinent prior to a vote, to express to City Council that based on the qualification of exemption status provided by OHR and CAO, there are multiple groups across the city that would also need to be re-classified.

The concern brought forth was that the work employees are performing is not adequately being compensated and that according to evaluation by Ms. Moore with CAO, the safety and industrial hygiene professionals do not meet the administrative or professional exemptions. Taking into account what is needed to constitute a these exemptions there are numerous classifications that do not appear to meet Ms. Moore's review of exemption status and should be reviewed for classification in order to ensure that they too are being fairly compensated. Some of the groups include; project managers, environmental, construction managers, estimators, administrators, risk management, data associates, IT (role dependent) and human resources just to name a few.

The main consideration for reevaluation of all these roles would be overtime pay. If the city has mis-classified the safety and industrial hygiene classifications for all this time it would stand to reason they could have done so for many other groups. During one of the career service board meetings, OHR/CAO stated that there was concern over employees suing the city for inaccurate classification and pay. With this concern in mind, I know for a fact that employees from the groups mentioned above are working overtime ours – long days, weekends, and even on while on paid time off. With the lack of merit increases, its more important now than ever to ensure we are truly paying all employees the full wages they deserve.

Thank you for your time,

Danielle Bergman