



Follow-up Review of Audit of Animal Services Licensure Function

Division of Inspector General **Neil Kelly, Clerk of the Circuit and County Courts** **Audit Report**

Bob Melton, CPA, CIA, CFE, CIG
Inspector General

Conducted by:
Cindy McLaughlin, CPA, CIA
Senior Inspector General Auditor

Sheena Patel, CIA
Inspector General Auditor

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*Division of Inspector General
Phone (352) 253-1644
Fax (352) 253-1645*

Clerk of the Circuit Court

*Post Office Box 7800
Tavares, Florida 32778-7800*

July 21, 2014

Board of County Commissioners

We have conducted a follow-up review of our audit of the Licensure function of the Board of County Commissioners' Animal Services Division, as scheduled per the Clerk's Annual Inspector General Audit Plan. The objectives of our review were to determine the implementation status of our previous recommendations.

Of the 19 recommendations in the report, we determined that 11 were implemented, 4 were partially implemented, and 4 were not implemented. The status of each of our recommendations is presented in this follow-up report.

We appreciate the cooperation and assistance provided by the Animal Services during the course of our review.

Respectfully submitted,

Bob Melton

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Inspector General

CC: Honorable Neil Kelly, Clerk of Circuit & County Courts
David Heath, County Manager
Brian Sheahan, Community Safety & Compliance Department Director

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INTRODUCTION

Scope and Methodology

We have conducted a follow-up review of our audit of Animal Services Licensure Function (Report No. 102). The objectives of our review were to determine the implementation status of our previous recommendations.

The objectives of the original audit were to:

1. Determine whether licensure fee revenue and compliance is being maximized.
2. Determine whether the licensure system provides accurate and current information.
3. Determine the effectiveness of the veterinarians' involvement in the licensure process.
4. Determine whether all licensure revenue has been accounted for properly.

To determine the current status of our previous recommendations, we surveyed and/or interviewed management to determine the actual actions taken to implement recommendations for improvement. We performed limited testing to verify the process of the recommendations for improvement.

Our follow-up review included such tests of records and other auditing procedures, as we considered necessary in the circumstances. Our follow-up review was performed during the month of June, 2014. The original audit period was October 1, 2011 through May, 2012. However, transactions, processes, and situations reviewed were not limited by the audit period.

Overall Conclusion

Of the 19 recommendations in the report, we determined that 11 were implemented, 4 were partially implemented, and 4 were not implemented. We continue to encourage management to fully implement the remaining recommendations.

Background

The Lake County Animal Services Division provides for public safety and animal welfare and enforces state statutes and local ordinances regarding animals. The Division promotes responsible pet ownership, reunites lost pets with their families, and helps people select a new furry friend through

the Adopt-a-Pet program. Animal Services is the Countywide receiving facility responsible for housing strays and quarantined animals, animals that are “live evidence” in court cases, and unwanted domestic animals.

Lake County Animal Services provides both shelter care and field services. Shelter care involves housing and feeding animals, provision of minor medical services, cleaning and care of animals, and facilitation of animal adoptions, rescues, owner reclaims and other outcomes. Field services include capture of loose or stray animals, response to citizen complaints such as aggressive animals, animal bites, tethering, barking, or other animal related violations, neighborhood patrol in higher risk areas, and enforcement of the Lake County Code as it relates to animals. Shelter services are provided to all 14 municipalities in Lake County (including Mount Dora and Lady Lake) while full service is provided to the unincorporated area and twelve municipalities within Lake County.

The following table represents the animals taken in by the shelter in 2014. This table does not include other animals such as wildlife and livestock that enter the facility.

Month	Dogs	Cats
January	344	182
February	286	250
March	324	244
April	306	312

The previous Manager of the Animal Services division resigned in April, 2013. The Director of the Conservation and Compliance department (now known as the Department of Community Safety and Compliance), in which the division resided, also resigned. The division then was temporarily placed under the direction of the Public Works Department Director. An interim manager was then provided internally over Animal Services until a new Manager was hired in May, 2013. The new Manager later resigned effective May 2, 2014. Since then, the prior interim manager has returned temporarily to Animal Services. The Lake County Board of County Commissioners asked the Lake County Sheriff's Office to submit a proposal for running the Animal Services operations. At this time, the Sheriff's Office is finalizing an agreement to take over the operations.

STATUS OF RECOMMENDATIONS

This section reports our follow-up on actions taken by management on the Opportunities for Improvement in our original audit of the Animal Services Licensure Function. The issues and recommendations contained herein are those of the original audit, followed by the current status of the recommendations.

1. Licensure Compliance Rates Should be Improved, and Licensing Fees Should be Evaluated.

The County could receive \$455,864 in additional revenue annually if licensure laws are reasonably complied with and if rates are comparable to other counties. We noted the following specific concerns:

- A. The percentage rate of licensed animals in Lake County could be increased. Currently, Lake County has a 6.5% licensure rate based on licensable pet estimates, which means 93.5% of the dogs and cats in Lake County are not licensed, even though all are required to have a license under the County ordinance. Based on the results of a 2009 survey performed by the Florida Animal Control Association (FACA), the State averages a 23.2% licensure rate of licensable animals. However, it is important that Animal Services aggressively pursue licensure of all applicable animals in Lake County. Public health and safety is compromised by applicable animals not being licensed as required.

Because of the lack of compliance with the County ordinance, the County is missing out on potential revenues estimated at \$170,003 for FY 2011 of which \$127,162 is annual recurring revenue, and the remaining \$42,841 would recur once every three years. These funds, if available, could be used to fund basic operations of Animal Services.

We have included specific recommendations to increase the rate of licensure in this report in Opportunities for Improvement Nos. 2, 3, 4, 5, and 7.

- B. The licensing fee structure should be evaluated. The licensing fees for Lake County Animal Services were not adequate to recover all costs. Only \$66,609 in revenue was received from license fees. However, operating costs for Animal Services were \$1,280,397 in FY 2011.

If the licensure rate were to be raised as recommended in Opportunity for Improvement No. 1A above, total annualized fees would be \$141,442. Animal Services is missing out on potential revenues estimated at \$70,216 in annual recurring revenue, plus an additional \$60,441 in revenues recurring once every three years (annualized revenue of \$90,363).

In addition, Lake County Licensure fees are significantly lower than the average of fees in other counties. If fees were raised to meet the averages of surrounding counties and the percentage rate of licensed animals was increased, Animal Services could see a potential increase in annual recurring revenues by \$371,470 plus an additional \$253,181 in revenues recurring once every 3 years (annualized revenue of \$455,864).

We Recommended management:

- A. Consider and implement programs to help ensure all appropriate animals are licensed.
- B. Evaluate the licensing fee structure and determine the most appropriate fees.

Status:

- A. **Partially Implemented.** The County contracted with a private service that promotes and processes licenses. This service provides licensure by mail, online, through offices of veterinarians, and at the Animal Services facility. In addition, we noted that some press releases have been issued that mention licensure. However, management has not maximized opportunities to promote licensure. For example, in August, 2013, Animal Services initiated a spay/neuter rebate program whereby Animal Services would issue a check to County residents in the amount up to \$50 for partial or total reimbursement of the amount paid to a veterinarian to have their pet spayed or neutered. This program does not require the pet to be licensed.
- B. **Implemented.** On May 21, 2013, Animal Services presented a revised fee schedule to the Board of County Commissioners. The licensing fees were increased with Board approval.

2. County Licensing Requirement Should be Promoted.

Animal Services does not have a promotion plan to educate County residents about the requirements to license dogs and cats. Residents learned about the requirement of a county license tag through their veterinarian or when they were warned by an Animal Control Officer for failing to have a current county tag. These methods are not effective. Some of the veterinarians do not offer or promote county license tags. (See Opportunity for Improvement No. 4.)

Methods of promotion available to Animal Services include:

- a. Newspapers
- b. County website
- c. Dog parks
- d. Utility bill inserts
- e. Mailings
- f. Lake County television
- g. County Fair and other events

Because of the lack of awareness of licensure laws, Lake County has a compliance rate of only 6.5% (as noted in Opportunity for Improvement No. 1). It is essential that a promotion plan be adopted to

significantly increase awareness and compliance with licensure laws. The County has an Office of Information Outreach that has expertise in providing citizen education regarding Lake County. This office could work with Animal Services to develop a Promotion Plan.

We Recommended management develop a plan for the promotion of licensing requirements by working with the Office of Information Outreach to determine the best available options.

Status:

Partially implemented. No formal plan has been developed; however, management has held meetings with the veterinarians and attended community meetings to promote the licensing program. To publicize the licensing requirements, the Communications Department has also updated the website, issued press releases, and developed a poster of county licensing requirements for use in veterinarian offices.

We again recommend that a formal plan be developed that further supports the best options and activities.

3. Renewal Notices Should be Provided.

Animal Services did not provide license renewal notices, and, therefore, was not in compliance with Florida Statutes. We estimated that compliance with the statutes would result in increased revenue of \$41,542 annually related to increased renewal of one-year licenses. We noted the following specific concerns:

- A. Animal Services did not contact current licensees prior to or after expiration of the license. No follow-up was performed when current license holders did not renew. As a result, license holders may forget their license is expired or otherwise choose not to renew. Section 828.28(1), Florida Statutes, requires that renewal notices be sent at least 45 days prior to the due date of the license to remind dog owners to purchase a tag. Animal Services was unaware of this statute.
- B. The software that Animal Services used to track licenses and animals did not have the capability to send out renewal notices. Other counties that we contacted for comparison were either using a different software that possessed the capability to send out renewal notices or were contracting with a third party vendor to process and send the notices. One or more third party providers are available to handle the licensure process. Our review indicated that some other counties use a third party service, and have found it to be effective.

We Recommended management:

- A. Provide renewal notices to dog and cat owners.
- B. Determine whether it would be beneficial to outsource the licensure process or to acquire software that can provide licensure renewal notices, along with any necessary staffing.

Status:

A&B. **Implemented.** The County has contracted with PetData to outsource the license renewal notices.

4. County License Tag Sales by Veterinarians Could be Maximized and Controls Over Tags Could be Enhanced.

Lake County could potentially see additional annual and recurring revenue of \$103,104 by increasing participation in county license tag sales by veterinarians. Lake County provided licenses to veterinarians to sell, usually at the time rabies vaccinations were provided by the veterinarians.

- A. Monthly rabies vaccination reports are provided by some, but not all, veterinarians to Animal Services. Under Lake County Code Sec. 4-36(d), “the owner of a rabies-susceptible animal which is vaccinated against rabies shall obtain a tag for the animal upon each vaccination.” A one-month sample of these reports was taken to compare the number of vaccinations given to the number of licenses issued. The percentage of licenses issued was determined to be 14.7% of the eligible vaccinated animals. If these reporting veterinarians are representative of the population, then this is a possible indication that the total net amount of annual and recurring additional revenue could be \$103,104, net of the \$1.00 handling fee per license to the veterinarians. By using the average licensure fee of the other counties as recommended in Opportunity for Improvement No. 1B, the amount of this additional revenue can then be projected to be \$373,680, of which \$265,536 is an annual and recurring amount
- B. Internal controls over license tags issued to veterinarians needed improvement. Each year, participating veterinarians were provided Lake County license tags to sell to pet owners upon vaccination of the pet for rabies. As rabies tags were issued to veterinarians and receipts were returned proving sale of the license, an Animal Services employee logged the tag numbers issued or returned. During our review of these logs, we noted two instances in which licenses were returned to Animal Services by veterinarians that were not recorded as having been issued to the veterinarians. These were detected only when the veterinarians returned the licenses.

We noted an additional three instances in which licenses returned to Animal Services by veterinarians were not recorded by Animal Services staff as having been returned. Although a log of issuances was maintained, there was no requirement that the persons making entries into the log initial the entry.
- C. The actual fee collected should be indicated on each license form. In many cases, when a customer adopts or reclaims an animal, the animal license is paid as part of the adoption/reclaim receipt. If the animal is already vaccinated, a license will be issued simultaneously. If the animal is not vaccinated, Animal Services will issue the license upon

proof of vaccination. In either case, when the license fee is collected through an adoption or reclaim, “no charge” is written on the license form. Although there is a field on the license form to indicate the receipt number through which the fee was collected, this field is not always filled out, and there is no place to indicate the receipt date. As a result, it is difficult to determine if a license form indicating “no charge” is truly a license with fees waived or simply a license charged through a separate receipt.

We Recommended management:

- A. Consider options to increase tag sales, including enacting an ordinance that makes it mandatory for the veterinarians to sell a county license tag at the time a rabies vaccination is given to a dog or cat.
- B. Require that the Animal Services employee issuing the licenses ensure the licenses are in sequential order of those issued in the log. In addition, the employee should record issuance in the log immediately upon issuance of the licenses to the vet. Employees making entries in the log should be required to take responsibility for the entry. Management should also consider developing an electronic logging system to use instead of the paper logging system currently in use.
- C. Require that the actual fee collected be indicated on each license. If the fee was collected through an adoption or reclaim, the receipt number and date should also be identified on the license.

Status:

- A. **Partially implemented.** The recommended ordinance making it mandatory for the veterinarians to sell a county license tag when the rabies vaccination is administered has not been developed. However, the County has contracted with PetData, which processes the county license tags and contacts pet owners for renewal licenses.
- B. **Implemented.** This is no longer an issue since Animal Services no longer distributes license tags to veterinarians; PetData issues the tags directly to the veterinarians.
- C. **Partially implemented.** The fee collected is indicated on the license form, including when the fee is part of the adoption package. However, the form does not provide a place for the receipt number to be entered.

We again recommend that the receipt number and date be identified on the license.

5. Controls Over and Processes Related to Citations Should be Tightened.

During our review of citations and related processes, we estimate that the opportunity to collect up to \$531,000 of revenue during fiscal year 2011 and through fiscal year 2012 was lost due to the current practice. We noted the following specific concerns:

- A. Animal Control Officers routinely issue written and/or verbal warnings to animal owners in instances in which their animals are not current on rabies vaccinations and license requirements. Under current practice, if an Animal Control Officer finds an unlicensed animal, the officer merely warns the owner to obtain the license within the next 10 days or the owner will be issued a citation. Note that this is not giving the owner 10 days to prove the license exists — it is giving the owner 10 days to obtain the license after getting caught.

Lake County Code of Ordinances section 4-36 states: “it is a violation...for any owner of any rabies-susceptible animal to fail to have and/or display in an appropriate manner the animal’s rabies certificate and county tag.” The ordinance recommends a \$150 penalty for the first violation and a \$500 penalty for any repeat violation within five years of a previous offense.

The current practice of only issuing warnings provides little or no incentive for owners to obtain licenses. Under the current system, an owner can wait and see if he gets caught and if so, obtain the license at that point.

- B. When a fine remains unpaid beyond the due date, Florida statutes allow a lien to be placed in the public record against the respondent. Liens are not recorded as soon as possible. We noted time lags of up to six months to record the liens. We found 22 fines with due dates ranging from February 11 to June 9, 2012 which have not yet been recorded in the public record. This reduces opportunities for the County to collect monies due since the respondent may effect transactions before the lien is recorded that would have otherwise required satisfaction of the lien. While reviewing liens, we also noted that lien recording fees are not included. Recording fees should be allowed to be recovered if ordered by the Special Master at the time of assessment.
- C. Animal Control Officers often issue citations while out in the field. For various reasons, an officer can void a citation. If a citation is voided, the officer is instructed to place it in the corresponding case file. Though citations are pre-numbered, there is no process for accounting for all citation numbers. The lack of accountability over citations could allow theft or misappropriation of funds to go undetected.
- D. While out in the field, Animal Control Officers often collect payment for various fees. It is the policy of the Division not to accept checks as payments, so customers often pay with cash. Though officers are instructed to issue a receipt with each transaction, it is difficult, if not impossible, to determine whether officers are in compliance. The policy of allowing officers to accept cash payments in the field increases the risk of theft or misappropriation of funds going undetected, and puts the officer at risk of false accusations. Therefore, the acceptance of cash payments by officers should be prohibited.

We Recommended management:

- A. Consider issuing citations in all instances in which an animal is not current on rabies vaccination and licensing requirements.

- B. Record liens immediately after the due date. In addition, management should work with the Special Master to require that any recording fees be paid by the respondent in addition to the fine amount.
- C. Develop a process for regularly accounting for all citation numbers issued to each Animal Control Officer, including verification of voided and blank citations on hand.
- D. Prohibit Animal Control Officers from accepting payments.

Status:

- A. **Not implemented.** Division practice continues to require Animal Control Officers to issue a Notice of Code (warning) for first time rabies and County tag violations. Violators are typically given a 10-14 day grace period in which to bring the animal in question to compliance. After that time, the Officer may issue a citation. Lake County Ordinance 4-36(i) has been modified to reduce the penalty for first time violators of the rabies vaccination and County tag requirements, but it still states that “the recommended penalty for a violation of this section is a fine of fifty dollars (\$50.00) for the first offense.” The ordinance makes no reference to allowing a 10 day grace period in which to comply.

We again recommend management consider issuing citations for first time violations of the rabies and licensing ordinances.

- B. **Not implemented.** To determine whether liens are filed in a timely manner, we reviewed the Special Master Case list which contains all Animal Control violation cases which were heard by the Special Master. The Case list goes as far back as December 9, 2009 when the Special Master process was first adopted by Lake County Animal Services. This Case list is used to track fines assessed, payments made and due, and any liens recorded for nonpayment of fines. The table below depicts the information relating to Special Master cases.

Special Master Cases from 12/09/2009 through 06/13/2014		
Amount	# of Cases	Description
\$178,926	349	Total Cases
\$68,019	169	Total Paid or Dismissed
\$76,050	122	Total unpaid cases with liens recorded
\$31,107	53	Total cases due and not recorded

*These figures include payments of \$1,118 which have not yet been updated into the Special Master case list. This table does not include a line for cases which are still unpaid but have not yet come due.

One of the 53 cases for which a lien was not recorded was due on September 11, 2010, and another was for a fine due on December 14, 2012. The remaining cases for which liens are required did not become due until on or after March 13, 2013 (and were unrecorded as of July 11, 2014).

Liens are not recorded in a timely manner. We reviewed 15 unpaid cases from January 1, 2013 through June 30, 2014. Five of these are from Calendar Year 2014 and the remaining ten are from Calendar Year 2013 as shown in the table below.

Case #	Fine	Payment Due Date	Paid Date	Date Lien Should be Filed	Date Lien Actually Filed
2014					
SM-AS-0952-14	\$300	2/08/2014	N/A	2/09/2014	Not filed
SM-AS-0969-14	\$500	6/12/2014	5/12/14	6/13/2014	N/A
SM-AS-0972-14	\$250	6/12/2014	N/A	6/13/2014	6/30/2014
SM-AS-0996-14	\$750	5/12/2014	N/A	5/13/2014	6/30/2014
SM-AS-0976-14	\$150	5/08/2014	N/A	5/09/2014	5/20/2014
2013					
SM-AS-0917-12	\$250	4/14/2013	N/A	4/15/2013	Not filed
SM-AS-0143-13	\$500	3/15/2013	N/A	3/16/2013	Not filed
SM-AS-0893-13	\$300	4/12/2013	N/A	4/13/2013	Not filed
SM-AS-0938-13	\$150	4/12/2013	N/A	4/13/2013	Not filed
SM-AS-0808-13	\$1,650	6/07/2013	N/A	6/08/2013	Not filed
SM-AS-0860-13	\$150	7/15/2013	6/5/2013	7/16/2013	N/A
SM-AS-1009-13	\$500	11/14/2013	N/A	11/15/2013	6/30/2014
SM-AS-1008-13	\$1,750	4/14/2014	N/A	4/15/2014	Not filed
SM-AS-0925-13	\$150	12/22/2013	N/A	12/23/2013	6/30/2014
SM-AS-0414-13	\$150	1/12/2014	N/A	1/13/2014	Not filed

Of the 2014 cases, 1 of the 5 did not have a lien recorded in a timely manner. This lien should have been recorded beginning February 9, 2014. For cases reviewed in 2013, liens for 7 of the 10 cases have not yet been recorded. Some of these liens were due to be recorded as far back as April 13, 2013. The two recorded liens were recorded more than 6 months past the due date. We noted the following contributing factors to this situation:

- Cases are not always properly entered into the system.
- All payments are not credited to the case on the Special Master Case list and/or in ShelterPro.
- Payments are not necessarily credited to the proper Person ID in ShelterPro when another person remits payment.
- Officers do not always verify the respondent's name when issuing violations.
- Names are not uniformly entered into ShelterPro.
- Receipts do not contain complete information.

We again recommend management record liens immediately after the due date.

Management should also review the contributing factors and consider appropriate action.

- C. **Not implemented.** The Division implemented a log system for officers to "check out" blank citations by number range. This log was not being used consistently by staff and its use was discontinued by September 16, 2013. No staff members have been assigned the task of accounting for all citations on a regular basis.

We again recommend management develop a process for regularly accounting for all citation numbers issued to each Animal Control Officer, including verification of voided and blank citations on hand.

- D. **Implemented.** A written policy was developed on July 15, 2014. Prior to this policy, according to management, Animal Control Officers were told not to accept payments in the field. As an additional measure to help prevent Officers from accepting payments, Officers are no longer issued County tags for issuance in the field. Pet owners must now pay for County tags online or in person at the shelter.

6. Automation Could be More Effective.

Software used by Animal Services did not provide adequate licensure information, fee information, or reports necessary for effective management. In addition we observed significant backlogs and omissions relating to entering and capturing information into the system. We noted the following specific concerns:

- A. Animal Services used commercially-available computer software to track animal information, including licensure, animal complaints, animals picked up, and animals in the shelter. During our review, we noted several inadequacies in the software as follows:
- a. The software did not facilitate exportable reports.
 - b. The system did not have the capability of storing or sending emails. Therefore, the required notifications of license renewals could be readily done by email.
 - c. The software did not allow for limited, read-only access. Volunteers have been allowed to enter license information into the system, with access to other functions of the software, including the ability to delete information.
 - d. The system lacked the ability to track changes within the application.
 - e. The software did not have the ability to track financial transactions.
- B. Some information was not entered into the system on a timely basis. As a result, specific animal information was not readily available. We noted the following specific concerns:
- a. Information for licenses issued by veterinarians was not entered into the system on a timely basis. During the course of the audit, a review of county licenses not yet entered in the system showed that the forms dated back to June 4, 2010. The estimated number of forms that had not been entered from this date through 2012 to date was 7,257.
 - b. Licensure fee amounts and expiration dates were not always entered into the system.
 - c. Information relating to whether the animal is sterilized or intact was sometimes not entered into the system.
 - d. Notes pertaining to the animal, including such items as why fees were being waived or reasons for actions taken, were written only on the physical cards without being entered into the system.

- C. Although the county license form asks for the mailing address of the dog or cat owner, a physical address was not required. A review of issued license forms showed that some of the mailing addresses are not physical addresses.

We Recommended management:

- A. 1) Request the vendor to add report capability to the system. Until this is done, management should work with IT to develop appropriate management reports from data extracted from the system. Alternatively, management should consider other animal shelter software that provides more of these features.
2) Request that email capability be added to the system.
3) Restrict access to the system to Animal Services employees only until such time as the system can provide appropriate levels of access. Once this is done, access should be limited to those needing only the specific features that they are responsible for using.
- B. Require all information to be entered into the system on a timely basis. Immediate action should be taken to enter the backlog of licenses into the system.
- C. Modify the county license form to include both the mailing address and the physical address.

Status:

- A. **Implemented.** New software was acquired to meet the division's needs.
- B. **Implemented.** In daily practice, licenses are being entered into the system on a timely basis. However, in instances when a large number of licenses are sold such as a rabies vaccination clinic, a backlog may be created.
- C. **Implemented.** The county license form includes areas for both the mailing and the physical addresses.

7. Animal Services Should Work With Veterinarians to Report Rabies Vaccinations.

Some veterinarians are not reporting rabies vaccinations to Animal Services as required by law. A search of the Department of Board of Professional Regulation licenses showed that Lake County currently has 30 veterinary establishments. A review of the rabies vaccination reports received by Animal Services during this calendar year revealed that 26 veterinarians, or 86%, have not provided any reports. Some veterinarians located outside of Lake County that provide services to Lake County pets have been more responsive.

As a result, Animal Services is not able to obtain rabies vaccination information quickly in the event of a bite, which could result in painful treatments and unnecessary expense to the victim. Animal Services is not receiving the information required by statute and is thereby precluded from ensuring that animals are appropriately vaccinated and licensed.

Section 828.30(3), Florida Statutes, states: "Upon vaccination against rabies, the licensed veterinarian shall provide the animal's owner and the animal control authority with a rabies vaccination certificate."

We Recommended management:

- A. Work with the veterinary community to devise a plan that facilitates compliance with rabies vaccination reporting requirements. If compliance is not achieved, management should use enforcement mechanisms allowed by law.
- B. Establish procedures to contact pet owners who did not purchase a county license tag when obtaining a rabies vaccination.

Status:

- A. **Not implemented.** Although meetings have been held with the veterinary community, some veterinarians still do not comply with the State law.

We again recommend management work with the veterinary community to devise a plan that facilitates compliance with rabies vaccination reporting requirements. If compliance is not achieved, management should use enforcement mechanisms allowed by law.

- B. **Implemented.** In the contract with PetData, notices will be mailed to pet owners who have vaccinated a pet against rabies but have not licensed the pet.