

Follow-up Review of Audit of Animal Services Kennel And Field Operations

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

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Report No. BCC-120
July 21, 2014



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Board of County Commissioners

We have conducted a follow-up review of our audit of the Kennel and Field Operations 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 45 recommendations in the report, we determined that 22 were implemented, 11 were partially implemented, and 12 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 Division during the course of our review.

Respectfully submitted,

Bob Melton

Bob Melton
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 conducted a follow-up review of our audit of Animal Services Kennel and Field Operations (Report No. BCC-106). The objective of our follow-up review was to determine the status of previous recommendations for improvement.

The objectives of the original audit were to:

1. Determine whether policies and procedures are adequate.
2. Determine whether treatment of animals complies with statutes and follows best practices.
3. Determine whether adequate controls are in place to safeguard assets.
4. Determine whether personnel are adequately trained and the Division is appropriately staffed.
5. Determine whether safety of the animals, public citizens, and staff is reasonable.

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 September 30, 2012. However, transactions, processes, and situations reviewed were not limited by the audit period.

Overall Conclusion

Of the 45 recommendations in the report, we determined that 22 were implemented, 11 were partially implemented, and 12 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 previous audit of the Animal Services Kennel and Field Operations. The issues and recommendations contained herein are those of the original audit, followed by the current status of the recommendations.

1. The Animal Tracking Process Needs Improvement.

We could not account for 1,609 animals that were noted as coming into the facility during the Fiscal Year ending September 30, 2012, as follows:

Number of Animals Entered Into the System (including animals with field service only)	13,527
Animal Outcomes:	
Adoptions	1,215
Rescues	2,368
Euthanized (including owner requested euthanasia)	4,324
Reclaimed	658
Other Misc. (release to nature, escaped, etc.)	273
Field Service or Owner's Custody Only	3,080
Total Animal Outcomes:	11,918
Total Animals Unaccounted for: (Animals entered minus animal outcomes) (13,527-11,918)	1,609

Because of inadequate records, we cannot determine whether these unaccounted for animals had proper dispositions. Lack of follow up on animal dispositions could allow misappropriation of funds to be undetected as animals could be sold or traded to outside parties.

Animals are not thoroughly tracked and documented from the time of arrival through the time of disposition. We noted many instances where the documentation of animals was incomplete or inconsistent. These issues were the result of both human error and problems with the computer software. We noted the following specific concerns:

- A. It can be difficult, if not impossible, to locate specific animal identification cards that have been filed. We were not able to locate the bulk of cards from January and February 2012.

- B. Not all animal identification cards are fully completed. Many are missing vital information such as animal identification number, cage run number, disposition methods/date, receipt number, and/or other animal information.
- C. Many animals have been identified as the wrong type of animal for disposition purposes in the software (for example, cats are marked as an adoptable dog or a euthanized dog).
- D. Information is not documented in the same method by all employees.

To ensure all animals are accounted for accurately, it is essential that adequate recordkeeping procedures be in place. Detailed procedures should be established, communicated, and followed by all persons involved in the recordkeeping process.

We Recommended management:

- A. Develop a standardized system for filing animal identification cards.
- B. Require animal identification cards to be completed in full. In addition a system of verifying complete animal information in the software system and on the animal identification card prior to filing the cards should be implemented.
- C. Work with the software provider to establish “logic checks” to prevent an animal from being identified as more than one species.
- D. Implement standardized written procedures for entries into the system. All employees should be trained on these procedures on an on-going basis.

Status:

- A. **Partially implemented.** Animal identification cards are now stored by month and then by disposition; they are not, however, sorted by animal id number. Additionally, we were unable to locate animal identification cards for 15 out of 64 cards sampled which were filed between February 1, 2014 and May 16, 2014.

We again recommend management fully implement a system for filing animal identification cards which allows for easy access when necessary.

- B. **Not implemented.** We noted that 42 out of 120 animal identification cards reviewed, for animals entering the shelter from February 5, 2014 to May 5, 2014, did not contain complete information. Additionally, 24 of those 120 cards contained information that did not match what was entered into the system.

We again recommend management require animal identification cards to be completed in full. In addition a system of verifying complete animal information in the software system and on the animal identification card prior to filing the cards should be implemented.

- C. **Implemented.** We did not note any animals identified as more than one species. We did, however, note one dog which was recorded as receiving a feline vaccination in addition to the canine vaccinations.

- D. **Partially implemented.** Animal Services staff has access to the software vendor's procedures for entering data into the system. There are, however, no division specific procedures for how or when to input data. Additionally, staff has not been provided comprehensive training from management regarding how to use the system.

We again recommend management implement standardized written procedures for entries into the system. All employees should be trained on these procedures on an on-going basis.

2. Kennel Operations Should Be Enhanced To Increase The Health And Safety Of The Animals, Animal Services Staff, And The Public.

Kennel Operations may not maximize the safety or well-being of the animals. Additionally, current processes may have adverse health and safety impacts for citizens of Lake County. We noted the following concerns:

- A. Kennel conditions should be improved. We noted the following:
- a. The temperature of the kennels and cat rooms is not adequately controlled. The kennels, isolation rooms, and cat rooms are not air conditioned. The isolation and feral cat rooms contain no exterior doors or windows, which severely precludes ventilation. The isolation rooms are used for sick or distressed animals, among other uses.
 - b. There is no mechanism to ensure proper air flow in the animal areas including the kennels, isolation rooms, or the cat rooms. Instead, there are written procedures that instruct staff to ensure the external doors are opened and floor fans are used. However, this is not done normally after business hours or on portions of weekends when the shelter is closed. In the quarantine rooms the only air flow is provided by leaving the interior door open.
 - c. True isolation areas do not exist. Currently, the doors in the isolation rooms are left open for light and air. These rooms also share the air exhaust system with the other areas of the facility. The potential exists to spread disease to animals throughout the entire facility.
 - d. Lighting conditions in the kennels, isolation rooms, and cat rooms are inadequate. Currently, natural lighting is minimal and the lights in the areas do not mimic natural light. In addition, the lights in the isolation rooms are always off unless there is a person inside.
- B. Practices and procedures relating to animal socialism and behavior should be improved. We noted the following related concerns:

- a. Not all dogs and cats are given physical activity and social interaction every day. There is no regular schedule for walking any of the animals. Social interaction and walking only occurs when volunteers are present or when staff has extra time. Animals spend virtually all of their time in confined spaces.
 - b. Observations of animal behavior are not routinely documented. Although animal behavior is observed on a daily basis, the observations are only documented if there is a problem with the animal.
- C. Staffing assignments should be evaluated. Our audit of Animal Services included a review of current kennel staffing. The current kennel staffing level consists of 12 shelter technicians. We are unable to reach a conclusion on the adequacy of kennel staffing because they are required to perform additional duties.
- D. We observed a rabies vaccination being administered by a technician instead of a licensed veterinarian as required by law. This Animal Services Technician administered the rabies vaccination to a dog in the building lobby.
- E. The practice of Management has been to flush unused vaccines down the drain. Management stated that this occurred on only one occasion, when an expired case of the rabies vaccination was flushed into the drainage system.
- F. The Lake County Animal Services adoption paperwork does not require the adopter to acknowledge adherence to the Lake County Code, nor does it require the adopter to maintain rabies vaccinations, current County tags or treat the animal humanely. Additionally, adopters are not screened prior to adoption.

We Recommended management:

- A. Consider options to provide for correction of each of the lighting, temperature, and air control conditions. Management should also consider options to ensure a true isolation area is available.
- B. Establish a program for regular social interaction and exercising each eligible animal on a regular basis, and establish procedures to document each observation of the animal.
- C. Consider alternative staffing options for the veterinary program.
- D. Develop a process to ensure the contracted veterinarian is the only one to administer the rabies vaccination.
- E. Dispose of all pharmaceuticals in accordance with the manufacturer's instructions and with the state, local, and federal regulations.
- F. Amend the adoption paperwork to require the adopter to acknowledge that they will comply with the Lake County Code. Management should also consider requiring the adopter to agree that they will maintain up-to-date rabies vaccinations and County tags for the life of the animal and provide humane care and treatment.

Status:

- A. **Partially implemented.** The fans are now on during the day as well as nights and weekends. Although no air conditioning has been installed, an alternative air cooling system has also been implemented to regulate the temperature. Doors are left open when practical and exhaust fans are kept running to promote fresh air exchanges. Lights are left on in occupied rooms during daylight hours and turned off at night to mimic natural light and dark. Light bulbs have been changed to enhance the lighting of the kennels. Significant improvements have been made; however, proper systems for lighting and air control have not yet been implemented. The shelter does not maintain a true isolation area for regular day to day operations, but they are able to convert two areas to a true isolation, which include separate air circulation, if the need arises.

We recommend management continue to make corrections to improve the lighting, temperature and air control conditions to meet standards for care of shelter animals.

- B. **Not implemented.** A program for socialization of animals has not been implemented. Additionally, staffing levels have not been adequate to allow time for socialization of all animals on a daily basis. Though not done on a daily basis, staff notes animal observations on both the animal ID cards and in the system.

We again recommend management establish a program for regular social interaction and exercising each eligible animal on a regular basis, and establish procedures to document each observation of the animal.

- C. **Partially implemented.** Vaccinations and deworming are no longer solely provided by the three kennel staff members dedicated to the veterinary program. These duties are now delegated to all staff bringing in or checking in animals as they enter the facility. While this has helped to alleviate the duties of the veterinary program staff, all shelter staff duties have increased with the increase in shelter size of 50 kennels and the increase in shelter hours which have been extended to remain open every Saturday. The shelter staffing size has not been increased. The use of the inmates through the Sheriff's work program will potentially alleviate the situation.

We again recommend management consider alternative staffing options for the veterinary program.

- D. **Implemented.** Staff has been made aware that they are not allowed to administer the rabies vaccination without a licensed veterinarian. According to the Director of Community Safety and Compliance, he regularly performs reviews to verify that vaccinations are administered by veterinarians.
- E. **Implemented.** All pharmaceuticals and other chemicals are disposed of through the Solid Waste Division which has a Pharmaceutical Collection program. These items would be disposed of according to DEA regulations.

- F. **Not implemented.** For a short period of time, adopters were required to sign paperwork in which they acknowledged that they would properly treat the animal, maintain up to date rabies vaccinations and County tags, and treat the animal humanely. This practice has stopped and adopters are not required to make these acknowledgements. According to management, this practice will be re-implemented beginning July 16, 2014.

We again recommend management amend the adoption paperwork to require the adopter to acknowledge that they will comply with the Lake County Code. Management should also consider requiring the adopter to agree that they will maintain up-to-date rabies vaccinations and County tags for the life of the animal and provide humane care and treatment.

3. The Rescue Coordinator Function Should Be Reconsidered.

The rescue coordination function, as it operated, placed the County at risk. We noted the following concerns:

- A. The rescue coordinator received monies in a personal capacity from rescue organizations. The funds were remitted to Animal Services either after she received the funds or before she received the funds.

While the division manager stated that she did not know for certain that this practice (monies being received personally by the rescue coordinator) was occurring, our review indicates that the manager either knew or should have known about the practice. The practice of funds being received by a County employee personally before or after being transmitted to the County is serious and should be immediately prohibited.

- B. The rescue coordinator operated a pledge program whereby members of the public could pledge specific donations to the rescue organization that takes a specific animal. The rescue coordinator caused photos to be taken of particular animals that the rescue coordinator had flagged to be available for rescue organizations. The coordinator then sent the photo and related information about the animal to a citizen maintaining a Facebook page on behalf of Animal Services. (See Opportunity for Improvement No. 4.) The Facebook page informed the public (worldwide) that if they would like to pledge money to a rescue organization to take the animal, they should email the rescue coordinator. The rescue coordinator received the information about the pledge and then forwarded the information to the citizen to post on the Facebook page.

We have the following concerns with this process:

- a. A County employee acted as a broker between rescue organizations and members of the public, which are private activities. The result is that the County facilitated in essence paying the rescue organizations to take certain animals.

- b. The rescue coordinator directed the public exactly where to send their donations. Therefore, if there is a problem with the webpage being to an improper entity or if a donor's identity or credit card information is stolen, the County could potentially have some liability.
 - c. When notification was made to various donors relating to their pledges for specific animals, all donors and the amounts of their pledges were included in the same email. Therefore, their information was communicated to other people throughout the country.
- C. Employees involved in the rescue coordination function have at times conducted much of the work on their personal time. To avoid any confusion, employees of the division should be prohibited from performing any extra volunteer work related to the division. This prohibition should be in writing and clearly understood by all employees.
- D. The rescue coordinator had a significant role in which animals were made available to rescue organizations. The coordinator monitored the animals and made an initial decision as to how long the animal will be available for public adoption. The rescue coordinator had a conflict of interest in being involved in the process as to which animals go to the rescue organizations.

We Recommended management:

- A. Prohibit all division employees from receiving funds personally that relate to the division. In addition, appropriate disciplinary action should be considered concerning those employees that conducted this practice or allowed this practice to occur. The function of rescue coordinator should be immediately rotated to another employee.
- B. Discontinue the pledge program whereby pledges are solicited for other organizations.
- C. Immediately prohibit nonexempt employees from conducting any work relating to Animal Services on their personal time. This prohibition should be in writing and acknowledged by all employees.
- D. Prohibit the rescue coordinator from having any involvement in the recommendation or decision to send any specific animal to rescue or the time in which the animal is to be available for public adoption.

Status:

- A. **Implemented.** A written policy prohibiting employees from accepting payments in the field was developed on July 15, 2014. Employees were previously given a verbal directive prohibiting them from accepting payments personally. They were told that if management discovers that money is being taken personally for business purposes, corrective action will be taken. The rescue coordinator position has been transferred to another employee.
- B. **Implemented.** The pledge program has been discontinued.
- C. **Implemented.** The County employee handbook prohibits employees from volunteering in the same division in which they are employed.

- D. **Implemented.** Division policy requires all adoptable animals to be available to the public for a minimum of 48 hours. The rescue coordinator networks with rescue groups after that time. She does not promise or hold animals for the rescue organizations. Rescues are held to the same first come, first served policy, after the 48 hours, which the public is held to.

4. Media Utilized For Citizen Outreach Programs Should Be County Approved.

The Animal Services Division did not have an official County approved Facebook page; however, a volunteer maintained a Facebook page for Animal Services. All content on the page was approved by a member of the Animal Services staff. This staff member regularly monitored the page and ensured the content was up to date.

We Recommended management submit a request for approval of a County authorized Facebook page. The page should be managed in accordance with County Policy. The County's direction of the private Facebook page should cease immediately.

Status:

Implemented. The Lake County Animal Services Facebook page has been approved by County management.

5. County Business Should Not Be Conducted Via Personal Email.

One Animal Services employee was using a personal email address to conduct County business. The County issues email addresses to many employees as a means to fulfill their duties. Management has access to and maintains security over the County email addresses and ensures emails are in compliance with public records laws.

Management was made aware that this was occurring, so a County email address was provided. While the employee began using the County provided address, she continued to direct the public to her personal email address. Additionally, we observed this employee referencing her personal email address when relaying information related to her current duties. In a County email to a rescue organization dated October 10, 2012, an Animal Control Officer functioning as rescue coordinator stated,

“my personal email is [personal email address]. I am the only person at the shelter that handles the rescue stuff, so if you call the shelter, they will not be able to answer your questions. If needed you can call me [personal cell phone number]...”

We Recommended management review this information and take disciplinary action as necessary.

Status:

Implemented. According to management, all employees found to have conducted County business via personal devices have been verbally warned.

6. Rescue Organizations Are Not Screened Prior To Adoption And Rescue Organizations Are Given Adoption Priority Over Citizens.

During the course of the audit, we reviewed the live release rates for incoming animals. We calculated the following live release rates for Lake County Animal Services in FY 2012 and compared those figures to those provided by other counties:

Comparison of Live Release Rates

County	Live Release Rate*		
	Dogs	Cats	Total **
Hillsborough	52.9%	18.3%	34.5%
Marion	49.4%	16.7%	31.5%
Pinellas	63.0%	39.6%	47.6%
Seminole	75.5%	18.8%	39.9%
Lake	77.3%	31.1%	56.5%

* All Live release rates exclude owner requested Euthanasia except for Seminole County which does not.
 ** Total includes all animals – dogs, cats, and other. Other consists of all incoming animal types that do not fall into the cat or dog categories, including but not limited to birds, ferrets, rabbits, livestock, snakes, fish, and fowl.

We determined the rates to be reasonable in relation to the other counties. However, management should continually search for ways to increase live release rates.

We also performed a review of Animal Service’s rescue program. While reviewing the rescue program, we noted the following areas for concern:

- A. Rescue groups were sometimes given adoption priority over citizens.
- B. Animal Rescue Groups that are used regularly by the shelter should be formally screened. Lake County Animal Services has worked with 300+ Animal Rescue groups.

We Recommended management:

- A. Establish a standard policy whereby citizens have an adequate opportunity to adopt animals before they are offered to rescue groups.
- B. Establish a uniform process for screening all rescue groups. This process should include a visit to the facility when feasible.

Status:

- A. **Implemented.** Division policy has been revised to require that citizens have first priority in adopting all adoptable animals. Animals are available to the public for a minimum of 48 hours before they are available to rescue organizations. We observed that all types of animals are posted on the Animal Services website and Facebook pages as they become available; and the daily intake register is posted on the Animal Services website allowing the public to be aware of what types of animals are coming in and when they may be available for adoption.
- B. **Partially implemented.** The rescue coordinator is reviewing online citizen reviews of the rescue organizations as well as their websites and social media pages. Rescues are prevented from rescuing additional animals if they have not shown proof of sterilization of animals that were released intact.

We again recommend management establish a uniform process for screening all rescue groups. This process should include a visit to the facility when feasible.

7. The Process Of Making Euthanasia Decisions Should Be Enhanced.

During Fiscal Year 2012, Animal Services euthanized 4,571 animals. The decision process of deciding whether to euthanize an animal was informal. We noted the following concerns with this practice:

- A. The euthanasia decision process was not in writing.
- B. The decision to euthanize should not be made by only one individual. Instead, a formal team should evaluate the animal and jointly make the decision. This team should be composed of a set group of individuals to facilitate consistent evaluations and decisions.
- C. Documentation of the euthanasia decision was not adequate.

We Recommended management:

- A. Develop written procedures for euthanasia decision-making and approvals.
- B. Continue the team approach in making euthanasia decisions.
- C. Include the reasons for euthanasia on the animal identification cards. In addition, all team members involved in the decision should sign-off on the cards.

Status:

- A. **Implemented.** Standard Operating Procedure KL-008, Euthanasia Determination Procedure, outlines generally accepted reasons for euthanasia. This procedure requires the team approach to be taken and specifies that two experienced staff and a supervisor must sign off for each animal. Exceptions are made for emergency situations; however, forms are required to document these situations.

- B. **Implemented.** Three to four people are required to make the decision to euthanize an animal. Though not always done in a group setting, reasons for euthanasia are discussed among those making the decision.
- C. **Implemented.** We reviewed current written policy which requires appropriate sign offs for euthanasia decisions along with the reasons for euthanasia. We sampled 10 animal ID cards for animals euthanized from April, 2014 to June, 2014. All cards sampled included the appropriate sign offs as well as reasons for euthanasia.

8. Animal Control Officers Should Reduce Field Time Performing Follow-Up Work, And Written Call Prioritizations And Required Call Times Should Be Available To Animal Control Officers.

During the course of the audit, we reviewed field officer response times. We noted the following opportunities to improve efficiency in the field.

- A. We estimated current call response times as follows, based on a randomly selected sample of calls during two non-consecutive months in calendar year 2012:

Animal Call Response Times

Call Priority	Average Response Time (hours)	Maximum Response Time (days)	Minimum Response Time (minutes)
High	6.42	1.23	13
Medium	5.85	.99	19
Low	33.25	17.89	5

Animal Services does not have any written guidelines establishing required call response times or call prioritizations based on type. With no written guidelines, response times for high priority calls could be increased leading to unnecessary harm or stress to the public and/or other responding agencies, delayed bite reports, or inability to locate aggressive animals responsible for a bite. As shown above, it has taken as long as a full day to respond to a high priority call. High priority calls can include but are not limited to bites, children being chased by an aggressive animal, an aggressive animal on school grounds during school hours, animal cruelty, or injured animals.

- B. Response times are not adequately tracked by management. Consequently, management review of adequacy of coverage on an ongoing basis is precluded.
- C. Currently, the Animal Control Officers spend a significant amount of their field time performing follow-up work. Follow-up can include verifying that rabies vaccinations and current County tags have been obtained, adequate shelter and/or fencing has been obtained, food and water is readily available to an animal, observing improved animal health, etc. However, verifying

rabies vaccinations and current County tags composes a majority of follow-up duties. Animal Control Officers must revisit the sites of violations, often multiple times, to verify compliance. Excessive time taken by officers for follow up on code violations could reduce response times for higher priority calls. Additionally, not enforcing the county code gives citizens little incentive to follow the established code. This puts the public and animals at risk as this could cause an increase of unvaccinated pets, strays, and tethered, neglected, or abused animals.

Under current practice, citations are not initially given for license tag and rabies violations. Instead, officers warn the citizens, and then follow up to make sure that license tags and/or rabies vaccinations are obtained. This practice is a needless waste of time. By changing the practice, and the County Code if necessary, citations could be issued initially. If the County wishes to provide a grace period for violations by citizens, the violator could be required to provide proof of correction within the prescribed time frame. This would accomplish the desired result and eliminate all of this type of follow up work by the officers. This situation was also included in our previous report on licensure (see BCC-102 Animal Services Licensure Report, Opportunity for Improvement No. 5).

We Recommended management:

- A. Establish a written call prioritization schedule which identifies both the priority of the call and the required response times for that call type.
- B. Regularly review current call response times to determine the reasonableness of response times by call type and location.
- C. Consider options to reduce follow-up time including eliminating follow up for rabies and county tag violations and establishing a practice of issuing citations for first time offenses. Respondents may be given a set period of time in which they are required to provide proof of compliance prior to enforcement of the citation.

Status:

- A. **Partially implemented.** There are no written call prioritizations nor are there required response times, but the ShelterPro system does prioritize calls based on the call type entered.

We again recommend management establish a written call prioritization schedule which identifies both the priority of the call and the required response times for that call type.

- B. **Not implemented.** According to management, the previous Division manager was performing these reviews; however, they were not documented. This process has been discontinued; however, management stated that when the Division manager position is filled, the practice will continue.

We again recommend management regularly review current call response times to determine the reasonableness of response times by call type and location. These reviews should be documented.

- C. **Not implemented.** Practices related to follow up on rabies and County tag violations have not been changed. Officers are still spending a significant amount of county resources performing follow up on these types of cases.

We again recommend management consider options to reduce follow-up time including eliminating follow up for rabies and county tag violations and establishing a practice of issuing citations for first time offenses. If citations are not immediately issued, an alternative may be for Respondents to be given a set period of time in which they are required to provide proof of compliance to Animal Services within the prescribed timeframe. If proof is not provided, a citation could then be issued.

9. Controls Over Take-Home Vehicles And On-Call Assignments Should Be Established.

While in the field during regular daytime hours and on-call hours on nights and weekends, Animal Control Officers are provided with a County vehicle to aid in their duties. During our observations of the operations of Animal Control Officers, we noted the following concerns:

- A. Animal Control Officers scheduled for vacation or sick leave time during their regularly scheduled daytime hours could elect to remain on the on-call shift at night. If the employee is truly on vacation, sick, or incapacitated for any reason, the public may be endangered if the officer is unable to respond.
- B. Take-home vehicles have been allowed for officers who reside out-of-county. We noted that one employee who lived outside of Lake County was scheduled for on-call duties five nights per week, every week. As part of her on-call obligations, the employee was allowed to take her County vehicle home each of these nights.

We Recommended management:

- A. Establish a policy of assigning on-call duties to another officer when the normally scheduled officer has requested a full day of leave.
- B. Establish a policy prohibiting vehicles to be taken home to an out-of-county location.

Status:

- A. **Implemented.** Management no longer allows officers to work on-call duties on days in which they took a full day of leave.
- B. **Implemented.** Management no longer allows officers residing out of county to take their vehicles home overnight. County vehicles are left at the County facility nearest their home for quick access in the case of an emergency.

10. Animal Services Fees Should Be Re-evaluated.

The fee structure did not promote the goals of Animal Services or may not have reasonably recovered the division's cost. Revenue was being lost in some instances because Animal Services was not charging the normal amount of fees as charged in other counties. In other instances, fees may not have been at the optimal level to promote goals in controlling the animal population and increasing the live release rate.

Upon review of the fee structure, we noted the following specific items which should be considered:

- A. The fee structure should be as simple as possible. Currently, the Lake County Animal Services adoption fee varies from \$65 to \$150. This practice can be confusing to the citizens who want to adopt an animal and to the staff who are required to calculate the fees. It also takes additional staff time to calculate the potential fees.
- B. The fee structure does not promote sterilizations by citizens. Sterilization fees are based on combination of factors including animal type, sex, and weight. Many other counties simplify this structure by disregarding the weight. In addition, no program currently exists to provide sterilization services to the citizens, unless they are adopting an animal. The sterilization program should be designed to promote the goals of the division regarding the county's animal population. (See Opportunity for Improvement No. 17.)
- C. Boarding fees should be sufficiently high to actively minimize boarding time. Boarding fees are significantly lower than other counties surveyed. The current fee may not reasonably discourage owners from minimizing time at Animal Services resulting in animals spending more time in the kennels than necessary. The County therefore incurs more cost and the lack of space may cause more animals to be euthanized.

We Recommended management:

Undertake a comprehensive study of the fee structure and:

- A. Consider the feasibility of establishing a flat fee structure for adoptions.
- B. Evaluate the feasibility of establishing a Countywide spay/neuter program.
- C. Consider raising the boarding fee to an amount appropriate to accomplish the goals of the division.

Status:

- A. **Implemented.** The adoption fee structure was changed to a flat fee basis of \$40 for unsterilized cats, \$50 for unsterilized dogs, and \$18 for a sterilized cat or dog.
- B. **Implemented.** On August 13, 2013, the BCC funded a rebate program that provides a rebate up to \$50 for spaying or neutering a kitten/cat or puppy/dog. The program has been funded with \$50,000, available on a first-come, first-served basis.

- C. **Not implemented.** The boarding fees have not been increased. Boarding fees should be set at a rate sufficiently high enough to cover costs and discourage owners from keeping their animals at the facility for longer than absolutely necessary. The resulting lack of available space may cause more animals to be euthanized.

We again recommend management consider raising the boarding fee to an amount appropriate to accomplish the goals of the division.

11. The Animal Control Sterilization Trust Fund Needs Clarification.

The Animal Control Sterilization Trust Fund did not have clear criteria for its funding and use. As a special fund type, it should have specific criteria established for its funding and use. In 1995, a Board resolution stated that the fund would be used to receive donations specifically for the prevention of animal over-population. In 2006, Animal Services presented a request to the Board for approval to expend monies in the fund to establish and operate a spay/neuter program for adopted dogs and cats. The request explained that the fund is earmarked for animal sterilization programs. The request further described that the professional services provided by a veterinarian to perform sterilization surgeries and other professional services in support of the adoption program and cruelty/neglect investigations would benefit the county. The fund would be used to pay the costs of the contracted veterinarian and then adoption fees paid by the public would be deposited into the fund. Our review shows that this is not the situation as noted in Opportunity for Improvement No. 12. It is unclear whether the fund is functioning as was intended. As a result, the fund may not be appropriately funded or utilized.

Additionally, the Animal Services page for donations on the county website described this fund as follows.

“All donated funds are placed in a special trust fund for the animals, designated specifically for the prevention of animal over-population. We use these funds to help cover the cost of a veterinarian who performs sterilizations before adoptees leave the shelter, medications and testing supplies, and general animal welfare. Donated funds stay at the shelter and are used solely for animal welfare. And your contribution is tax-deductible under section 501(c)3. Use the form below to make a monetary donation online now!”

Although contributions to the fund are tax-deductible, the statement that donations are deductible under section 501(c)(3) is incorrect. The fund has not been, and does not need to be, created as a section 501(c)(3), or charitable organization fund. A donation to the fund is deductible because it is made to a governmental entity for public purposes.

We Recommended management:

- A. Determine clear criteria for the funding and use of the Animal Control Sterilization Trust Fund and then seek approval of an appropriate resolution by the Board of County Commissioners.

- B. Remove reference of the fund as a 501(c)(3) from the Animal Services webpage and any other publications.

Status:

- A. **Implemented.** The Board of County Commissioners reviewed and approved funding sources and uses for the renamed Animal Control Trust Fund. However, one of the listed funding sources is “any fine received by the County as a result of a violation of the Lake County Code.” It is not clear whether the intent was to only include fines from animal control violations.
- B. **Implemented.** The reference is no longer included on the webpage or other publications.

12. All Revenues And Expenditures Need To Be Reviewed By Fund To Correct Mismatching.

As a result of mismatching of revenues and expenditures between the General Fund and the Animal Control Sterilization Trust Fund, Animal Services may not be using the funds correctly. When an entity is funded by more than one fund, a clear matching of revenues and expenditures for each fund should occur. The underlying principle is that expenses should be paid from the same fund from which the related revenue is being deposited.

Animal Services’ functions are funded by the General Fund and the Animal Control Sterilization Trust Fund. During our review, we noted that Animal Services’ revenues and expenditures are mismatched between these funds. Our review of the Animal Control Sterilization Trust Fund and the General Fund showed that in some areas, expenditures are made in one fund, while the related revenue is received in the other fund. For example, the monies received from spaying/neutering an animal are deposited into the General Fund while the cost of the contracted veterinarian who performs the spay/neuter surgery is paid out of the Animal Control Sterilization Trust Fund. This results in a mismatching of revenues and expenditures. We noted the following instances of mismatching.

	General Fund		Animal Control Sterilization Trust Fund	
	Revenue	Expenditure	Revenue	Expenditure
Vaccinations (other than Rabies) and microchips		X	X	
Livestock Impoundment/ Sales		X	X	
Credit Card Maintenance/ Convenience Fees		X	X	
Animal Sterilization Fees	X			X

This practice may result in the Animal Control Sterilization Trust Fund subsidizing the General Fund, or it could result in monies due the General Fund being diverted to the other fund maintained by Animal Services.

We Recommended management ensure related revenues and expenses are matched in the same fund. This principle should be included in the Board Resolution recommended in Opportunity for Improvement No. 11.

Status:

Partially implemented. Although the mismatching of revenues and expenditures has been corrected in the instances of vaccinations and microchips and animal sterilization fees, the mismatching of revenues and expenditures still exists for livestock impoundment/sales. Additionally, no credit card convenience fees are currently being collected, although they were specifically authorized in Resolution 2013-58 when the fee schedule was revised and approved by the Board of County Commissioners on May 21, 2013.

The table below shows the current accounting for the instances noted during in the audit:

	General Fund		Animal Control Sterilization Trust Fund (renamed Animal Shelter Trust Fund)	
	Revenue	Expenditure	Revenue	Expenditure
Vaccinations (other than Rabies) and microchips	X	X		
Livestock Impoundment/ Sales		X	X	
Credit Card Maintenance/ Convenience Fees	Convenience fees are not being charged as authorized.	X		
Animal Sterilization Fees	X*	X		

* The animal sterilization fees are now part of the total adoption fee “package,” which includes sterilization, rabies vaccination, deworming, microchip, and a 1-year County license.

We again recommend management ensure related revenues and expenses are matched in the same fund.

13. The Cash Receipt Process Needs Improvement.

Basic controls over cash are inadequate. The current process lacks the assurance of consistency, and theft or misappropriation of funds could occur without detection. We noted the following specific concerns:

- A. Segregation of duties relating to cash balancing does not exist. The same person who receives the cash is also balancing the cash without an independent review of the balancing paperwork. This person is in a position to conceal shortages or overages without detection.
- B. Cash balancing was done in view of the public along with other tasks. The cash balancing process was performed by the same person who simultaneously handled customer contact. The person who balanced the cash also was responsible for answering the telephone and waiting on customers, and, therefore, the balancing was done at the counter in full view of the public. The inability to concentrate on the cash balancing procedures could lead to errors in the process. Performing balancing in front of the public could increase the risk of theft.
- C. The cash register is not being used effectively. Receipts are not rung up in the cash register. Instead, the drawer is merely opened and the cash is put in the drawer. A manual written receipt is then prepared. The cash register is being used, in effect, as a cash drawer. Consequently, the automated controls provided are not being used. Although manual receipts provide some control, failure to use automated controls increases the risk of theft or misappropriation without detection.
- D. Cash on hand is not kept secure. The cash drawer in the cash register could be opened with the push of one button. Most kennel employees know which button to push to open the drawer. Also, petty cash and the change fund were stored in a drawer in the manager's office. The manager's office and the drawer were not always locked.
- E. The receipt issued for adoptions includes an "other" line where the technician writes in "vaccinations, tests, microchip" in some combination. The fees written on this line vary, from \$40 to \$55 as reviewed, depending on the vaccinations and tests provided. However, no detail is provided on the form as to which specific tests are provided. Therefore, it is unclear if all the goods and services are included.
- F. Written criteria and rationale should exist for the waiver of fees. During our review, we noted that fees had been waived by the Division Manager. While Section 4-10(c) of the Lake County Code states that with the redemption of animals "the director may waive fees or expenses for hardship or extenuating circumstances," no written criteria exist to determine in what instances fees can be waived. Criteria are necessary to document that the circumstances justified the waiver of fees due to the County.

To minimize risk of theft or misappropriation of monies received, adequate cash controls must be in place. Otherwise, theft or misappropriation of funds can occur without detection. With the current practices, this risk is significant.

We Recommended management **immediately**:

- A. Segregate duties to provide adequate checks and balances over cash, e.g. segregate the functions of receiving cash from balancing the register. In addition, an independent reviewer should review the balancing paperwork.
- B. Require the balancer to remove the cash drawer and balance the cash outside of public view.
- C. Establish cash register controls to provide reasonable controls over cash receipts, including a required procedure to ring up all receipts using the cash register.
- D. Program the cash register to only open the drawer when a receipt is entered or with manager approval with a key and ensure cash on hand is stored in a physically secure location at all times.
- E. Ensure that detail of all the goods and services provided, i.e. vaccinations and tests, be written on the receipts.
- F. Establish specific criteria for the waiver of fees.

Status:

- A. **Not implemented.** Although procedures have been written, all employees working the front desk are not trained on, or even aware of, the procedures. One cash drawer is shared by all employees working the front desk. The functions of receiving the cash are not segregated from balancing the cash drawer and an independent reviewer does not review the balancing paperwork.

We again recommend management segregate duties to provide adequate checks and balances over cash, e.g. segregate the functions of receiving cash from balancing the cash drawer. In addition, an independent reviewer should review the balancing paperwork.

- B. **Implemented.** The locking cash drawer is stored and counted outside of public view.
- C. **Not implemented.** Animal Services no longer uses a cash register; however, controls over cash receipts need to be enhanced. Although license receipts are usually entered by the end of the day, we observed that 118 county licenses from the rabies vaccination clinic on March 22 had not been entered into the system.

We again recommend management establish cash register controls to provide reasonable controls over cash receipts, including a required procedure to ring up all receipts using a cash register.

- D. **Implemented.**
- E. **Not implemented.** Except in instances where individual charges are incurred, like boarding fees, a rabies vaccination, and county license, the description printed on the receipt typically

contained a one-line description, with no detail of what medical care or other goods were included.

We again recommend management ensure that detail of all the goods and services provided, i.e., vaccinations and tests, be written on the receipts.

- F. **Not implemented.** Although Resolution 2013-58 states that the County Manager is authorized to waive Animal Services fees and the Lake County Code provides for the Animal Services director to waive fees for hardship or extenuating circumstances, specific criteria for the waiver of fees have not been established.

We again recommend management establish specific criteria for the waiver of fees.

14. Contracts With Veterinarians For Emergency Service Should Be Established.

No written contract currently exists with the emergency veterinary clinic; instead, there is only a verbal understanding. Without a written contract in place, Animal Services may be incurring excess emergency veterinary costs. We noted an instance in which a veterinarian at the emergency clinic, perhaps unaware of the verbal understanding, provided more services than desired by Animal Services. Animal Services, while able to negotiate a reduced charge afterwards, was unable to show that all the excess services exceeded the verbal agreement. Written contracts should be established with vendors to determine rates, scope, and responsibilities.

We Recommended management establish written contracts with the emergency veterinary clinic and any other veterinary clinics that are anticipated to be used on a regular basis by Animal Services.

Status:

Not implemented. Written contracts have not been established with veterinary clinics that are used on a regular basis.

We again recommend management establish contracts with emergency veterinary and other clinics to determine rates, scope, and responsibilities.

15. Potential Risk To Shelter Staff Should Be Minimized.

During our review of current kennel conditions as compared to recommended guidelines as well as existing policies and procedures, we noted that Division policy requirements are not sufficient to maximize employee health and safety. We noted the following specific concerns:

- A. Animal Services staff members are not required, as part of their duties, to have a current Tetanus vaccination though the Center for Disease Control, National Association of State Public Health Veterinarians, American Humane Association, and American Society for the Prevention

of Cruelty to Animals each recommend a current Tetanus vaccination for animal care employees.

Due to the nature of their jobs, Animal Services employees are susceptible to cuts, scrapes, scratches and bites. A lack of current tetanus vaccination puts the employees at risk.

- B. Personal protective equipment should be required. Gloves and eye protection are available to Animal Services employees; however, they are not required to wear them at all times during cleaning and disinfecting. We have observed Animal Services employees hosing down kennels, cleaning and disinfecting. During those observations, we have not seen employees using eye protection. We observed some wearing gloves at times and others not wearing gloves.

The Center for Disease Control and the Guidelines for Standards for Care recommend that gloves and eye protection be worn while cleaning and disinfecting animal cages and while handling sick animals. Lack of eye protection increases the employee's risk of exposure to disease and chemical damage to the eyes.

We Recommended management:

- A. Require all Animal Services staff members to maintain a current tetanus vaccination.
- B. Require all staff to wear gloves and eye protection while cleaning and disinfecting animal cages. In addition, gloves should be required when handling sick animals.

Status:

- A. **Partially implemented.** Animal Services staff members have not received nor maintain a current tetanus vaccination. However, on July 8, 2014, management received approval from the Board of County Commissioners of a collaborative agreement with the Health Department to annually provide tetanus vaccinations to a maximum of ten employees.

We again recommend management require all Animal Services staff members to maintain a current tetanus vaccination.

- B. **Not implemented.** Animal Services staff members are not required to wear gloves and eye protection while cleaning and disinfecting the animal cages. Gloves are not required in all procedures when an employee may be handling sick animals, although written protocols do include instances where gloves and antibacterial gel are required.

We again recommend management require all staff to wear gloves and eye protection while cleaning and disinfecting animal cages. In addition, gloves should be required when handling sick animals.

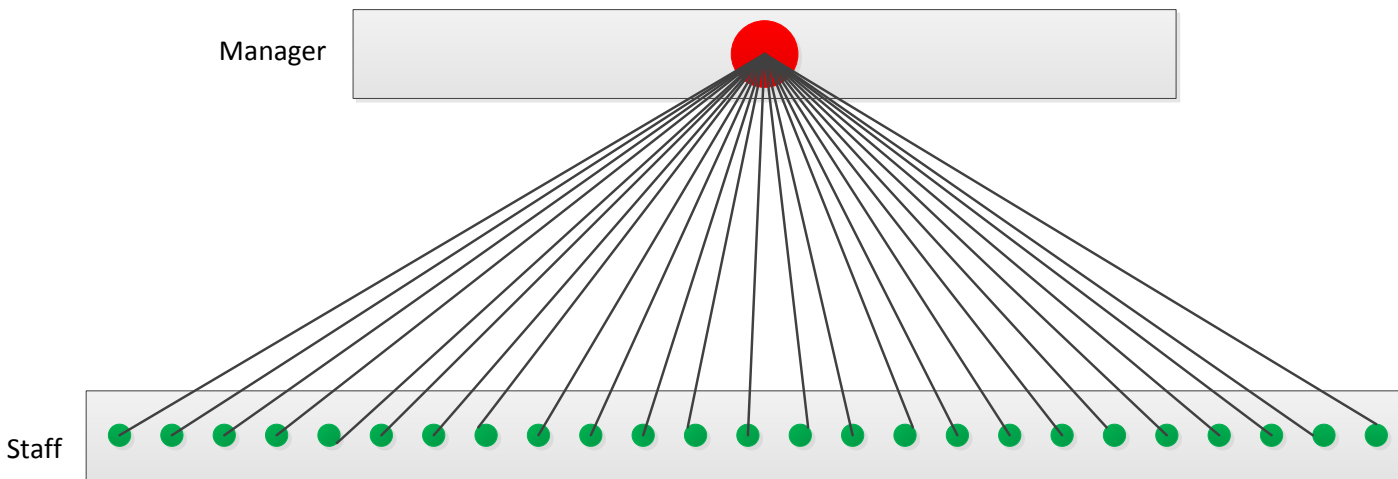
16. A Staff Supervisory Structure Should Be Established.

The only supervisor within Animal Services was the division manager, who had all 25 employees reporting directly to her. The types and numbers of employees were:

Types of Employees	Number
Kennel Staff	12
Animal Control Officers	10
Dispatchers	2
Administration	1

None of the 25 employees reporting to the division manager had supervisory responsibilities or supervised other staff. Consequently, the manager had to supervise all 25 employees directly. This involved being required to make all decisions regarding any situation that is not routine. Since the nature of the operations is dynamic and volatile, much involvement of the manager was required in day-to-day operations. This type of situation requires a narrow span of control, rather than the current wide span of control.

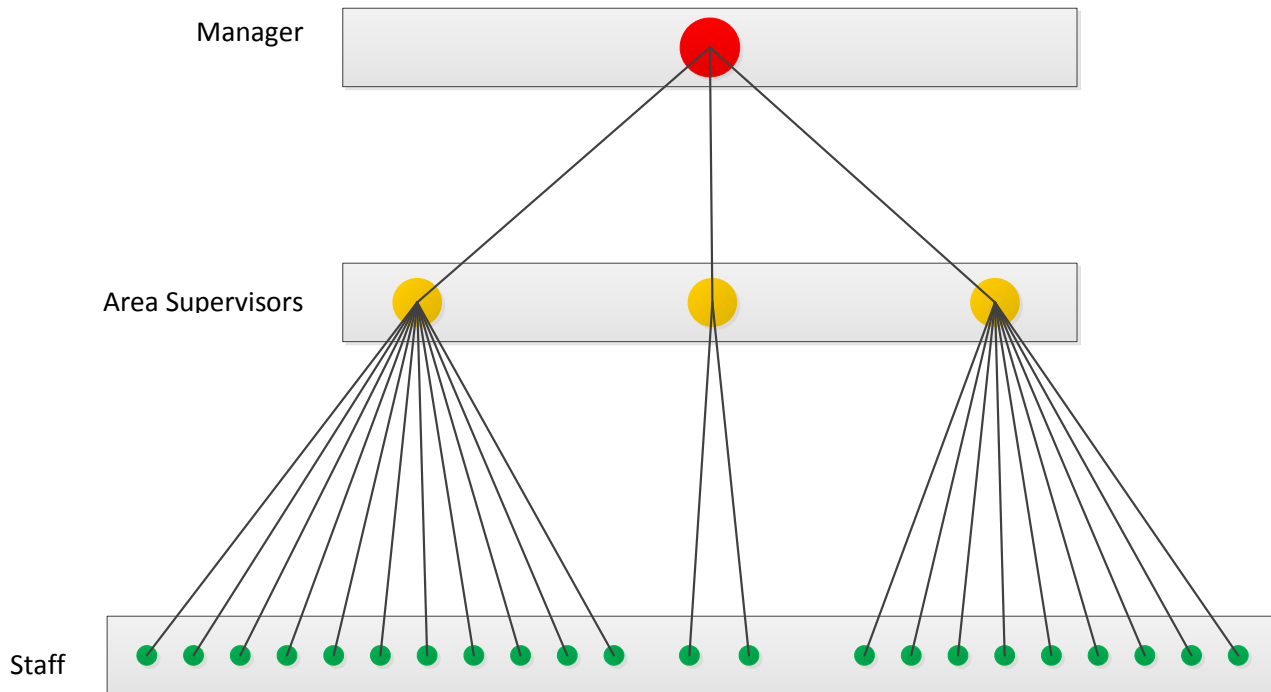
Span of control is a term that refers to the number of employees that report to a supervisor. The span of control could be depicted as follows:



With this wide span of control in a dynamic organization that encounters many unusual and different types of situations involving potential emergencies, the manager's effectiveness is not maximized. In this type of environment, not only is undue stress placed on the manager, but also, the manager does not have time to devote to high level administration and planning. As a result, organizational effectiveness is diminished. In addition, succession planning is virtually nonexistent since only the

manager is handling unexpected situations. This places significant risk on the County should the manager suddenly no longer be available to perform her duties.

This situation can be remedied with minimal increased cost. Operations can be broadly categorized into three functional areas: Kennel Staff, Animal Control Officers, and Administration (which includes dispatchers). If one person in each of these areas is designated supervisor of the area, the manager’s span of control would be reduced from 25 to 3. This recommended span of control can be illustrated as follows:



By requiring the newly established supervisors to perform existing duties to the extent possible, and by implementing the other recommendations in our report and in our report on Licensure (see BCC-102 Animal Services Licensure Report), we believe no expansion of staff would be necessary. By establishing new management responsibilities and converting the positions to “exempt” status, many management decisions could be effectively delegated. Had this structure been in place, we believe many of the adverse conditions noted in our report could have been reduced or eliminated.

We Recommended management consider implementing a supervisory structure in each of the major functional areas.

Status:

Partially implemented. An Animal Services Supervisor over the Shelter Technicians has been established.

We again recommend management consider implementing a supervisory structure over each of the other two functional areas: Animal Control Officers and Administration.

17. Organizational Progress Could Be Achieved By Enhancing Customer Service.

By sharing Animal Services' responsibilities and improving an aspect of customer service, Animal Services' customer service could be enhanced. During our review, we noted the following options to assist in enhancing customer service.

- A. Every feasible means of reducing the uncontrolled breeding of dogs and cats should be encouraged, as stated in Florida Statute 823.15(1). During the last several years, Lake County Animal Services has become responsible for full service of animal control and welfare to an increasing number of municipalities. As part of this transfer, the municipalities are required to adopt Chapter 4 of the Lake County Code and share in these responsibilities. These municipalities have regular communication with their residents (through utility bills, community events, and their websites) that the County does not.
- B. Customer service at the reception desk was not always being provided on a timely basis. Only one phone was located at the reception desk in the Animal Services' facility. If the shelter was experiencing high call volumes and/or high customer traffic, other staff members were not able to assist by answering the phone in that location.

We Recommended management:

- A. Include information about the discounted spay/neuter programs in a prominent place on the County website and work with the twelve municipalities to which Animal Services provides service to publicize these programs to residents.
- B. Install an additional phone at the reception desk.

Status:

- A. **Partially implemented.** The municipalities have been contacted at a basic level through press releases. Further contact and communications could be used to enhance publicity of the programs by the municipalities.

We again recommend management work with the twelve municipalities to which Animal Services provides service to publicize these programs to residents.

- B. **Implemented.** A second phone has been installed.

18. Written Procedures Should Be Established And Followed.

During our review, we noted many instances where written procedures, if followed, could enhance the operations, improve controls over assets such as cash, and provide better information for management decisions. Written procedures are needed for the following areas:

- A. The cash receiving process. No instructions or other written procedures exist for daily balancing of cash, information to be included on receipts, and deposit procedures. The lack of written procedures related to cash handling could lead to loss or misappropriation of funds.
- B. Acceptance of a payment in the field. Animal Control Officers are permitted to accept payments for licenses and other fees. The lack of written procedures does not ensure that only allowed types of payments are accepted and that they are accounted for properly.
- C. Documentation of animals (animal identification cards, medical records, etc.). No written procedures exist to ensure consistent information is documented on animal identification cards and medical records on a timely basis. Had written procedures been in effect, the situations noted in Opportunity for Improvement No. 1 may not have occurred.
- D. Call prioritization and required call response times. Although Animal Control Officers are generally aware of acceptable prioritization and response times, these requirements are not documented in writing.
- E. On-call duties and responsibilities for field officers, including shelter duties during weekend hours. During non-business hours various personnel are required to be on-call and to perform various necessary activities. There are limited written procedures to ensure these responsibilities are being met.
- F. Follow-up duties of Animal Control Officers. Animal Control Officers have been responsible for following up on various situations including warnings issued for lack of licenses and various situations. The time spent in the performance of follow-up duties by the ACOs may be inappropriate or otherwise unnecessary.
- G. Entering and retrieving information in the software system. The software system includes descriptions of the animal, medical treatment and condition, and disposition. Adequate tracking of animals is not possible with inconsistent and incomplete data entered into the system. Had written procedures been in effect, the situations noted in Opportunity for Improvement No. 1 may not have occurred.
- H. Placing and releasing liens for fines unpaid. Liens could remain unrecorded for an excessive period of time. This might give time to the lienor to transact business that would otherwise require payment of the lien or allow other debtors the chance to record liens before those of Animal Services. The other debtor would then be in line for payment ahead of Animal Services.

- I. Screening adopters. No written procedures exist for screening those who desire to adopt an animal. Without screening, the potential exists for a citizen to adopt more animals than allowable by Lake County Code (based on the size of their property). Additionally persons attempting to adopt could have currently open Animal Services cases; as a result, animals could potentially end up in unsafe or inhumane living conditions or be used for illegal purposes if adopters are not screened.
- J. Determination of rescue versus public adoption. The practice is to generally allow adoption by Lake County citizens prior to animals being offered to rescue agencies. However, no written guidelines exist as to the circumstances relating to when to make animals available to rescue agencies. Animals could potentially end up in unsafe or inhumane living conditions or be used for illegal purposes if adopters are not screened. In addition, Lake County citizens may not have first priority in the opportunity to acquire animals for pets.
- K. Prioritization of animal rescues and applicable charges. The Division works with many rescue agencies, which usually charge the public to adopt animals that they have rescued from Animal Services. No written procedures exist to determine the priority in contacting rescue organizations. Had written procedures existed, some of the situations noted in Opportunity for Improvement No. 6 may not have occurred.
- L. Determination of euthanasia. Division staff regularly makes decisions as to which animals are to be euthanized. However, there are no written procedures outlining the criteria governing whether an animal is to be euthanized.
- M. Waiver of fees. Fees are sometimes waived by the manager for hardship situations or extenuating circumstances. No written procedures exist to establish the criteria justifying the waiver of fees. As a result, amounts of fees waived could be inconsistently applied.
- N. Fund sources and uses. Animal Services uses the General Fund and the Shelter Control Sterilization Trust Fund in its operations. However, no written procedures exist as to the revenue and expenses that are to be applied to each respective fund. Revenues and expenditures could be included in the incorrect fund, resulting in mismatching of revenues with the related expenses. Had written procedures been in effect, the situations noted in Opportunity for Improvement No. 12 may not have occurred.

We Recommended management develop detailed procedures for all functional areas of the division and review for improvement those already in place.

Status:

Overall, the status of this recommendation is partially implemented. The specific status for each functional area is as follows:

- A. **Cash Receiving Process – Implemented.** Procedures have been written; however, we noted that not all employees in the cash receiving process were aware of or following those procedures.
- B. **Acceptance of Payment in the field –Implemented.** A written policy prohibiting employees from accepting payments in the field was developed on July 15, 2014. Officers were previously given a verbal directive prohibiting acceptance of payment in the field.
- C. **Documentation of animals (animal ID cards, medical records, etc.) – Not Implemented.** Procedures have not been written to ensure consistent information is documented on Animal ID cards and medical records on a timely basis.
- D. **Call prioritization and required call response times – Not Implemented.** There are no written protocols indicating call priorities or required response times.
- E. **On-call duties and responsibilities for field officers, including shelter duties during weekend hours – Implemented.** Kennel duties have been assigned to kennel staff on weekend days. The Kennel Operations procedure details duties to be performed daily. The night shift officer procedure briefly details duties of Animal Control Officers scheduled during night time hours.
- F. **Follow up duties of Animal Control Officers – Not implemented.** There are no written procedures minimizing the follow up duties of Animal Control officers for open cases.
- G. **Entering and retrieving information in the software system – Not Implemented.** Division specific procedures have not been written to ensure information is entered correctly and consistently into the system.
- H. **Placing and releasing liens for fines unpaid – Not Implemented.** There are no written procedures for tracking payments of fines due or recording liens or releases for fines unpaid.
- I. **Screening adopters – Not Implemented.** There are no written procedures for screening adopters and adopters are not required to acknowledge that they will adhere to laws, maintain up to date rabies vaccinations and County tags, or treat the animal in a humane manner.
- J. **Determination of rescue versus public adoption – Partially Implemented.** Written procedures exist defining when animals are unadoptable and when they can or cannot go to a rescue organization. Additionally, policy prohibits adoptions to rescue organizations that have failed to sterilize animals, maintain rabies vaccinations, or maintain proper housing. Written procedures do not exist for screening rescue organizations (beyond verifying a valid nonprofit status), nor are rescue organizations required to confirm that they will maintain compliance with local and state laws, have appropriate animal care protocols, and will treat the animals in a humane manner.

- K. **Prioritization of animal rescues and applicable charges – Implemented.** The adoption procedure states that citizens always have priority to adopt animals over rescue organizations.
- L. **Determination of euthanasia – Implemented.** The euthanasia determination procedure describes instances in which the decision to euthanize may be reasonable. It requires sign off by multiple staff. The sign offs must include the reason for the decision.
- M. **Waiver of fees – Not implemented.** No written procedures exist to establish the criteria justifying the waiver of fees. As a result, amounts of fees waived could be inconsistently applied.
- N. **Fund sources and uses - Partially implemented.** Although Resolution 2013-57 lists sources and uses for the renamed Animal Control Trust Fund, the uses of the funds are general and consequently subject to interpretation. Procedures that include clear criteria for use should be established to prevent mismatching of revenues and expenses from occurring.

We again recommend management develop detailed procedures for all functional areas of the division and review for improvement those already in place.