



DATE: February 13, 2018
TO: Board of County Commissioners
FROM: John Hutzler, County Auditor
SUBJECT: Audit of Animal Services

Attached is the County Auditor's report on Animal Services together with the response of the County Administrator and the Auditor's Addendum commenting on the response.

We wish to thank the Animal Services Manager and staff, the Director of Health and Human Services, and the County Administrative Office for their assistance with this audit.

We conducted this audit to determine (1) whether Animal Services complies with industry standards, (2) whether Animal Services complies with applicable laws, and (3) whether Animal Services adequately safeguards cash.

We found that (1) Animal Services follows most, but not all, industry standards, (2) Animal Services follows most, but not all, applicable laws, and (3) Animal Services could improve controls over cash handling.

To improve shelter operations, Animal Services should initiate a planning process to determine how it will provide at least the minimum level of acceptable or humane care to animals in shelter without euthanizing healthy and treatable companion animals.

To satisfy the requirements of county code and state law, Animal Services should (a) license all animal rescue entities that operate within the County, (2) make available to the public a full list of animals in custody, and (3) retain all finding reports of domestic animals for six months.

We also made recommendations for improved cash handling, several of which Animal Service management had already implemented before we completed our audit work.

Management generally agrees with our report, and the response from the Director of HHS and the County Administrator provides reasonable assurance that management will implement our recommendations relating to code compliance and cash handling.

However, although they acknowledge that our recommendation supports their intention to provide quality services, the HHS Director and the County Administrator are unwilling to commit Animal Services to a planning process that will address identified deficiencies in the care of sheltered animals.

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**Washington County
Auditor's Office**

Audit of Animal Services

Final Report
February 13, 2018



John Hutzler, CIA, CGAP, CCSA
County Auditor

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AUDIT OF ANIMAL SERVICES

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AUDIT OF ANIMAL SERVICES

EXECUTIVE SUMMARY

Why we audited Animal Services

We conducted this audit to address the following questions:

- Does Animal Services comply with industry standards?
- Does Animal Services comply with applicable laws?
- Does Animal Services adequately safeguard cash?

What we found

- Animal Services follows most, but not all, industry standards.
- Animal Services follows most, but not all, applicable laws.
- Animal Services could improve controls over cash handling.

What we recommend

To improve shelter operations, Animal Services should initiate a planning process to determine how it will provide at least the minimum level of acceptable or humane care to animals in shelter while not euthanizing healthy and treatable companion animals. As first steps in that process, Animal Services should:

- assess its current capacity to provide that minimum level of care,
- project the demand for shelter care,
- identify the gaps between its current capacity to care and projected demand, and
- identify options for reducing that gap.

To satisfy the requirements of county code and state law, Animal Services should:

- License all animal rescue entities that operate within Washington County;
- Make available to the public a full list of animals in the custody or care of Animal Services or any enforcement officer;

- Clarify in policy that staff must retain for six months all finding reports of domestic animals.

To improve controls over cash, Animal Services should:

- Develop written policies to address cash transactions in the field and the processing of mail payments;
- Discontinue, or increase controls over, the practice of accepting cash payments in the field.
- Change the safe combination at least once a year and following the termination of any employee with safe access,
- Document the transfer of the daily deposit to the animal services officer and from the officer to HHS Administration;
- Reconcile daily receipts to the general ledger;
- Ensure that staff perform all cash counts out of public view, lock cash drawers during breaks, process mail receipts daily, and securely store cash and credit card information.

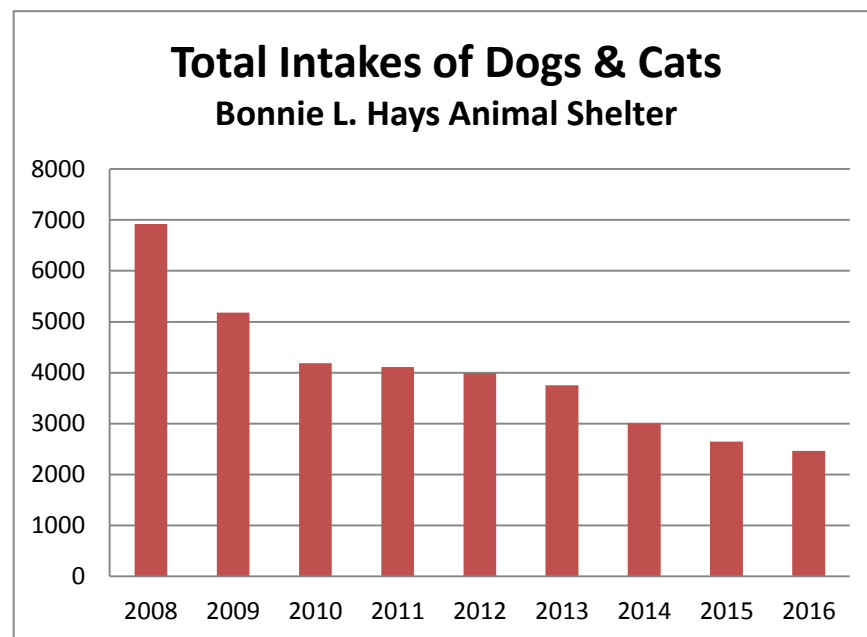


A handwritten signature in black ink, appearing to read "John R. Hays", is written over the seal.

BACKGROUND

Animal Services is a division of Washington County's Health and Human Services Department (HHS). Animal Services enforces Washington County's animal service code, which includes licensing dogs, investigating animal abuse, sheltering stray animals, and returning lost pets to their owners. Animal Services operates the Bonnie L. Hays Animal Shelter, constructed in the mid-1990s.

In FY 2016-17, Animal Services issued more than 16,000 dog licenses and initiated more than 5,800 field contacts related to animal welfare or public safety concerns. In 2016 Animal Services sheltered about 2,500 dogs and cats, and returned about 1,000 lost pets to their owners. The number of dogs and cats passing through the shelter has declined steadily from 2008 to 2016.



The FY 2016-17 budget for Animal Services was \$2.7 million, composed of \$1.9 million in revenues supplemented by about \$850,000 from the General Fund. Animal Services revenues are received by administrative staff at the shelter, through payments on invoices issued by the Finance Department, and through online payments for dog licenses. Shelter staff processed over \$800,000 in transactions in FY 2016-17.

During FY 2016-17 Animal Services staff included 4.2 administrative staff, 7 shelter technicians, 6 field officers, 2 veterinary staff, 1.4 education and outreach staff, 2 supervisors and a manager. Shelter volunteers, developed through a carefully structured program, supplement County staff. The part-time Volunteer Coordinator oversees a program that includes an

application process, training, work schedules, and clearly defined volunteer duties and rules of behavior. In FY 2016-17, volunteers provided about 5,500 hours of service, freeing shelter staff to perform other responsibilities. Volunteer duties include both animal care/socialization and administrative tasks.

We included this audit on our FY 2015-16 audit plan to answer the following questions:

- Does Animal Services follow industry standards for animal shelters?
- Does Animal Services comply with applicable laws and regulations?
- Does Animal Services employ appropriate controls over cash?

FINDINGS & RECOMMENDATIONS

Compliance with Industry Standards

The Asilomar Accords

Beginning in 2004 leaders of more than twenty animal welfare organizations, including the American Humane Association, the Humane Society of the United States, the American Society for the Prevention of Cruelty to Animals, and the Society of Animal Welfare Administrators, came together to develop the Asilomar Accords. Named for the location of the initial meeting in Asilomar, California, the Accords express the common goal of significantly reducing the euthanasia of healthy and treatable dogs and cats in this country.

To further this goal the Accords define a process by which “community coalitions” of animal welfare organizations can classify animals coming into shelters and systematically save and adopt out the maximum number of cases. The Accords propose a uniform method for collecting and reporting shelter data in order to promote transparency and better assess the euthanasia rate of healthy and treatable animals. Standard definitions of terms and a standardized methodology for calculating the live release rate for an organization and a community enable uniform and accurate collection, analysis, and reporting of animal-sheltering data and statistics.

Washington County Animal Services is a founding member of the Animal Shelter Alliance of Portland (ASAP), a community coalition of animal welfare organization in the metropolitan Portland area committed to the Asilomar Accords. In 2008 the ASAP committed to the guiding principles of the Asilomar Accords. In 2009 ASAP implemented its Pet Evaluation Matrix (PEM), a community refinement of the Asilomar Accords. The PEM classifies dogs and cats into four categories: “healthy,” “rehabilitatable,” “manageable” and “unhealthy.”

- “Healthy” cats and dogs are reasonably healthy, well adjusted pets over the age of eight weeks and are ready for adoption.
- “Rehabilitatable” dogs and cats are not “healthy,” but are likely to become “healthy,” if given care equivalent to that typically provided to pets by reasonable and caring owners in the community.
- “Manageable” dogs and cats are not “healthy” and are not likely to become “healthy,” but would likely maintain a

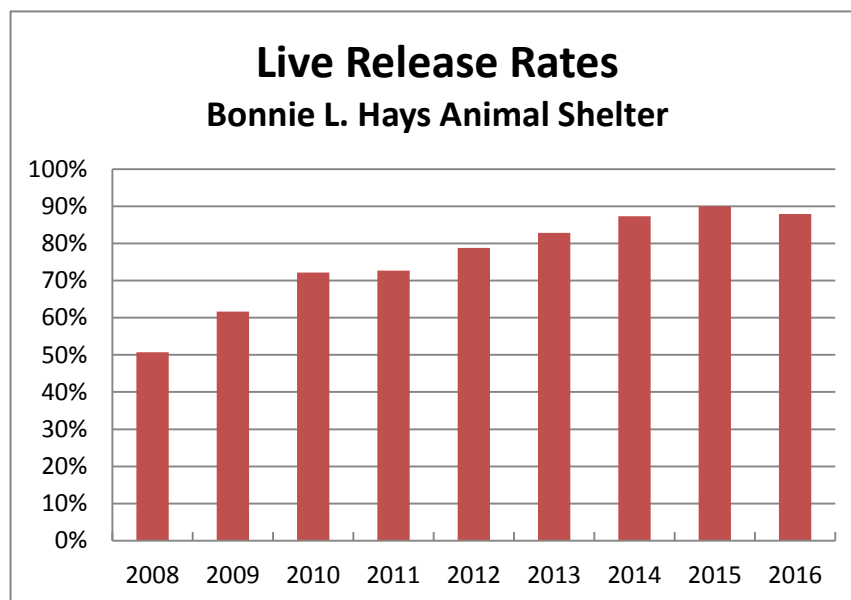
satisfactory quality of life, if given care equivalent to that provided to pets by reasonable and caring owners in the community.

- “Unhealthy” dogs and cats are not “healthy,” and are not likely to become healthy or to have a satisfactory quality of life even if given care equivalent to that typically provided to pets by reasonable and caring owners in the community.

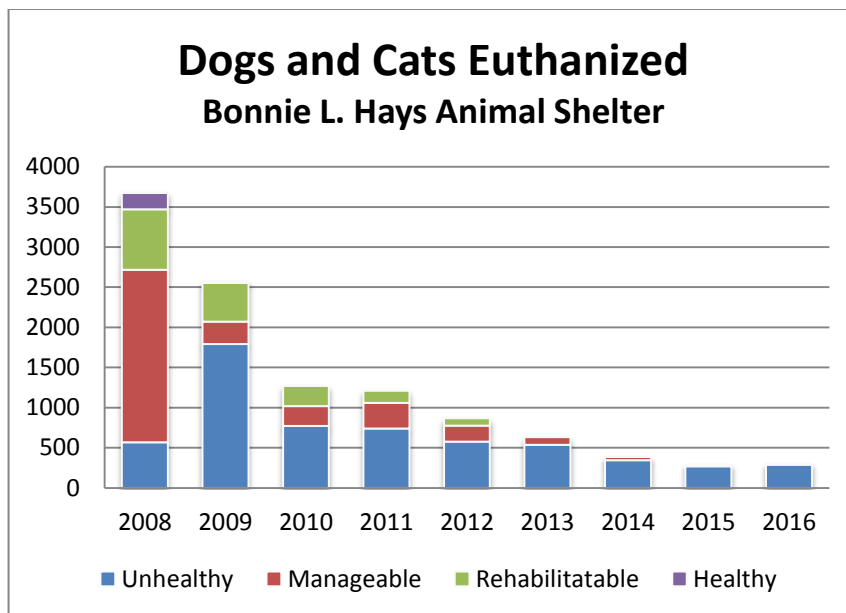
Dogs and cats who are “rehabilitatable” or “manageable” are also referred to as “treatable.”

ASAP's ultimate goal is to end the euthanasia of healthy, social, and treatable companion animals, as well as feral cats, in its community. Collaboration among coalition partners facilitates the transfer of an animal to the partner best suited to treat and adopt out that animal, thereby maximizing the live release rate of each of the partners and the community as a whole.

Animal Services appears to have implemented effectively the Asilomar Accords as applied locally by the ASAP community coalition. The Animal Shelter's live release rate has risen from 51% in 2008 to 88% in 2016.



Animal Services has substantially achieved the ultimate goal of the Accords - to end the euthanasia of healthy and treatable dogs and cats. In 2016 Animal Services euthanized only nine such dogs and cats, down from more than 3,100 in 2008.



Animal Services attributes its success in this area to:

- Reductions in intake due to the effectiveness of its spay and save programs in reducing unplanned births in cats,
- The willingness of its partner agencies in the region to accept transfers of animals from Animal Services. (Over the last five years, partner agencies, both inside and outside ASAP, that are better positioned to treat animals or arrange for their adoption have accepted the transfer of more than 3,600 cats and dogs from the Bonnie L. Hays shelter.), and
- Ending the practice of routinely providing owner-requested routine euthanasia services. (In 2008 there were more than 1200 owner requests to euthanize pets. In 2016 there were only 22 such requests.)

Association of Shelter Veterinarians Guidelines

In 2010 the Association of Shelter Veterinarians published Guidelines for Standards of Care in Animal Shelters. The Guidelines were promptly endorsed by leading organizations in the animal welfare field, including:

- The National Federation of Humane Societies (NFHS),
- The Society of Animal Welfare Administrators (SAWA),
- The National Animal Control Association (NACA),
- The American Society for Prevention of Cruelty to Animals (ASPCA), and
- The Humane Society of the United States (HSUS).

The ASV based its Guidelines on the “Five Freedoms,” originally developed in 1965 in the United Kingdom to address welfare concerns in agriculture, but now recognized as applicable across species and situations. The Five Freedoms for Animal Welfare include:

1. Freedom from Hunger and Thirst: by ready access to fresh water and a diet to maintain full health and vigor;
2. Freedom from Discomfort: by providing an appropriate environment including shelter and a comfortable resting area;
3. Freedom from Pain, Injury, or Disease: by prevention or rapid diagnosis and treatment
4. Freedom to Express Normal Behavior: by providing sufficient space, proper facilities, and company of the animal's own kind; and
5. Freedom from Fear and Distress: by ensuring conditions and treatment that avoid mental suffering.

The Guidelines address twelve areas of shelter operations:

1. Management and record keeping,
2. Facility design and environment,
3. Population management,
4. Sanitation,
5. Medical health and physical wellbeing,
6. Behavioral health and mental wellbeing,
7. Group housing,
8. Animal handling,
9. Euthanasia,
10. Spaying and neutering,
11. Animal transport, and
12. Public health.

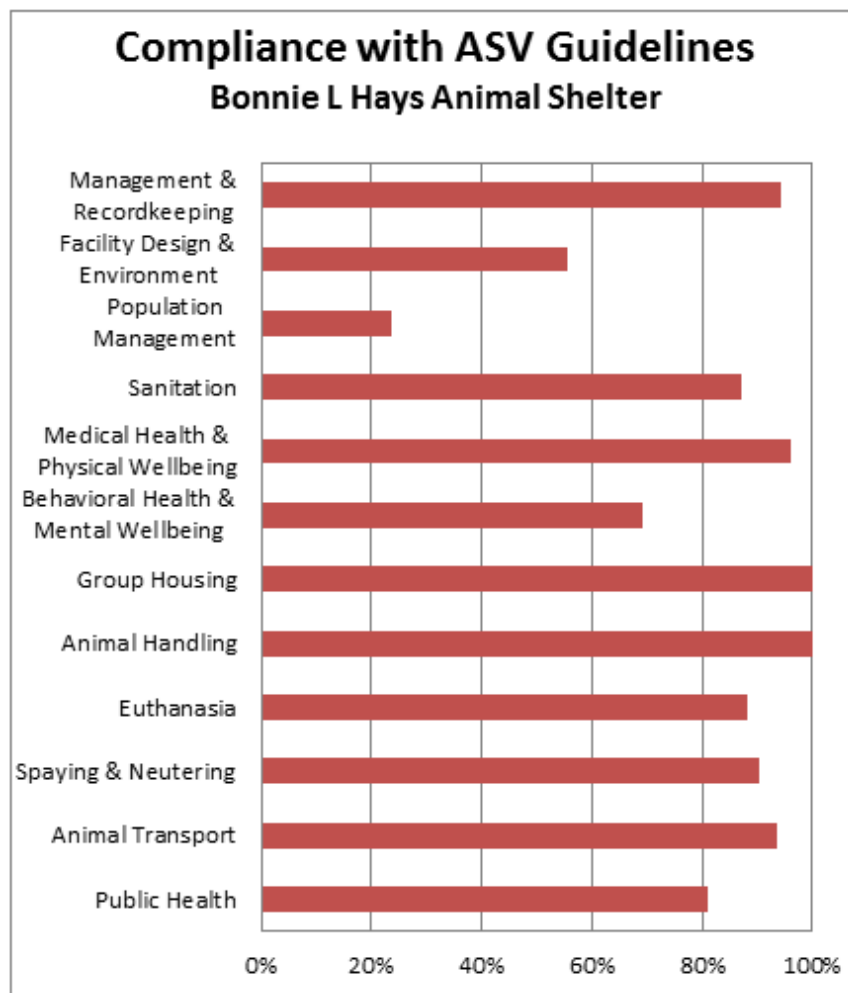
Based upon those principles the ASV Guidelines identify “unacceptable,” “must,” “should,” and “ideal” practices for shelter operations. “Unacceptable” highlights practices that must be corrected as soon as possible to provide an acceptable level of care. A “must” indicates that without adherence to this recommendation, a shelter cannot deliver a minimum level of acceptable humane care. “Should” implies a strong recommendation. Best practices are identified in the Guidelines as “ideal” or “best.”

We found that Animal Services followed most, but not all, of the Association of Shelter Veterinarians (ASV) guidelines. Animal Services engaged in three unacceptable practices and did not

follow 15% of must and 17% of should practices recommended by the ASV Guidelines. To achieve at least the minimum level of acceptable or humane care, Animal Services needs to address the three Unacceptable and 34 Must practices with which it does not currently, consistently comply. See Appendix A for a list of the specific guidelines that Animal Services acknowledges it does not follow.

Animal Service's Compliance with ASV Guidelines												
ASV Guidelines	Unacceptable Practices			Must Practices			Should Practices			Ideal Practices		
	Yes	No	NA	Yes	No	NA	Yes	No	NA	Yes	No	NA
Management & Recordkeeping	0	0	0	9	1	0	7	0	0	1	0	0
Facility Design & Environment	3	0	0	13	11	1	23	19	1	1	2	0
Population Management	0	1	0	2	10	0	2	0	0	0	2	0
Sanitation	1	1	0	18	2	0	34	4	1	2	1	0
Medical Health & Physical Wellbeing	2	0	0	51	0	0	66	3	0	5	2	0
Behavioral Health & Wellbeing	1	1	0	18	7	0	17	7	1	2	2	0
Group Housing	2	0	0	9	0	3	8	0	0	0	0	1
Animal Housing	1	0	0	4	0	0	7	0	0	0	0	0
Euthanasia	4	0	0	16	1	0	17	4	0	1	0	0
Spaying & Neutering	1	0	0	14	2	0	3	0	1	1	0	0
Animal Transport	1	0	0	26	0	4	16	3	3	0	0	0
Public Health	1	0	0	12	0	0	21	6	0	0	2	0
Totals	17	3	0	192	34	8	221	46	7	13	11	1

Areas in which Animal Services most needs to improve include Facility Design and Environment, Population Management, and Behavioral Health & Mental Wellbeing.



Noncompliance is rooted in a variety of causes, including:

- The County built the existing animal shelter in a different time and culture when Animal Services euthanized most impounded animals. The facility was not designed to humanely house the current flow of animals held for adoption or return to owner. Cramped shelter conditions cause additional stress on animals, increase the risk of disease, and generally reduce the quality of life for animals housed in the shelter.
- Staff and volunteer hours available to care for animals are often inadequate to ensure a minimum level of humane care for the number of animals in the shelter.
- Animal Services does not have a strategic plan of its own, but is guided by the ASAP strategic plan. That plan focuses on achieving the Asilomar Accords goal of not euthanizing healthy and treatable companion animals, but does not address the standard of care shelters should provide. Animal Services management has prioritized the

goal of not euthanizing adoptable pets over ASV Guidelines on population management. Animal Services has not assessed its capacity to provide a minimum level of humane care, as defined by the ASV Guidelines.

Animal Services' staff are committed to providing the highest level of care possible despite the limitations of the shelter facility. Management reported that staff do what they can to mitigate the adverse effects of those practices that do not comply with ASV Guidelines.

We recommend that Animal Services initiate a planning process to determine how it will provide at least the minimum level of acceptable or humane care to animals in shelter (as defined by ASV Unacceptable and Must criteria) while not euthanizing health and treatable companion animals. As first steps in that planning process, Animal Services should assess its current capacity to provide a minimum level of acceptable or humane care to animals in shelter, project the demand for shelter care, identify the gap between its current capacity to care and projected demand, and identify options for reducing that gap.

Compliance with Applicable Laws

The Oregon Revised Statutes and the Washington County Animal Services Code establish the authority and responsibilities of Washington County Animal Services. State law allows Counties to adopt their own animal ordinances, and since Washington County has done so, its code is the principle source of Animal Services' authority and responsibilities.

Animal Services follows almost all provisions of the County Animal Services Code. We found three opportunities for improvement, as described below.

Animal Services does not license animal rescue entities operating within Washington County.

County Code 6.04.175 section 1 provides: "Any animal rescue entity operating, in whole or in part, in Washington County shall obtain an animal rescue entity license from animal services prior to beginning operations."

Animal Services has not implemented a licensing program for animal rescue agencies. The Animal Services Manager reported that Animal Services has not been issuing licenses because she

and her colleagues in neighboring counties have not decided how they should license animal rescue agencies that operate in more than one county.

The County Code is clear that animal rescue agencies operating in Washington County must obtain a license from Animal Services, even if they also operate in other counties. The inability to obtain a license may deter animal rescue agencies from operating in Washington County.

Animal rescue agencies operating in the County are subject to inspection by any enforcement officer to ensure they comply with minimum care standards. Licensing would ensure that Animal Services is aware that an agency is operating in the County and subject to inspection. The absence of a licensing program increases the risk that animals could be held by an agency that does not provide appropriate care.

We recommend that Animal Services license all animal rescue entities that operate within Washington County.

Animal Services does not provide a public listing of every impounded animal as required by County Code.

County Animal Services Code 6.04.130(2) provides “A daily record of [impounded] animals shall be kept at the place of impoundment and shall be made available to the public.” County Code defines an impounded animal as “any animal in the custody or care of animal services for any reason, or any animal that is caught, seized, surrendered, or otherwise placed in the custody of any enforcement officer anywhere in Washington County.”

Animal Services maintains two impounded animal reports available to the public on the Animal Services website. Pet Finder lists impounded animals available for adoption, and Pet Harbor lists impounded animals available for redemption by their identified owners.

Animal Services does not include on either list impounded animals held pending a court hearing, dangerous dogs, and animals quarantined as potentially rabid. Making such information available could reassure residents that Animal Services has neutralized threats from dangerous or potentially dangerous animals in their neighborhoods.

We recommend that Animal Services make available to the public a full list of animals in the custody or care of Animal Services or any enforcement officer.

Animal Services does not retain for public review six months of records of reported findings of domestic animals as required by County Code.

County Code 6.04.220(3) provides that "Records of reported findings of Domestic Animals shall be retained for six (6) months by Animal Services and made available for public inspection." Animal Services policy 107 instructs staff to retain paper copies of found/lost reports until a match is made or until the binder can no longer hold any additional reports.

We found only the five most recent months of reports available for public inspection in a binder at the intake desk of the shelter. Failing to retain these reports for public inspection for the required period could compromise the County's interest in returning lost pets to their owners.

We recommend that Animal Services revise its policy to clarify that staff must retain all finding reports of domestic animals for six months. If necessary, Animal Services should use a larger binder, or more than one binder, to accommodate the full six months of reports.

Controls over Cash

Each morning Monday through Saturday, one of the Administrative Specialists (Admin) working the front desk that day opens the safe under the desk and removes the cash and receipts from the previous day. The Admin counts out the starting cash for each of the three cash drawers, delivers one to each of the Admins on duty, and returns the starting cash for any unused cash drawer(s) to the safe. Each Admin verifies their starting cash count. One of the Admins prepares the daily deposit of the previous day's receipts, reconciling cash, checks, and credit card payments to reports from the Animal Services information system and the credit card machines, and manually totaling the deposit. The Admin puts the deposit into a locking cash bag and places the locked bag into a key-locked safe at the back of the administrative area.

Only animal service officers have keys to this safe. Each weekday one of the officers removes the deposit bag from the safe and

delivers it to a Senior Administrative Specialist (Sr. Admin.) in HHS Administration. The Sr. Admin records the receipts into the general ledger and prepares a bank deposit slip and a Cash Receipts Transmittal Form. After approval by an HHS Supervisor, the Sr. Admin. delivers the deposit to the Finance Department for delivery to the bank.

These processes are described in the Animal Services Policy and Procedure Manual. The Policy and Procedure on Cash Transactions also provides that the safe must be locked at all times and its combination changed at regular intervals or whenever a security risk is identified.

The Animal Services Supervisor reported that he has directed officers to check the license status of any stray dog they encounter. When returning a stray found to be unlicensed to its owner, officers may collect the licensing fee, warn the owner to promptly license their pet, or issue a citation. Owners who elect to pay the officer may pay by cash, check, or credit card and should receive a receipt from the officer. We were told that officers do not record such payments. They must deliver the payments to the shelter before the end of the day for Admins to record in the Animal Services information system and include in the daily deposit.

Cash handling best practices include:

- Written policies and procedures for all cash transactions,
- Immediate recording of cash received,
- Securing cash at all times,
- Clear accountability for cash,
- Appropriate segregation of duties, and
- Daily accounting and reconciling of receipts.

We found that Administrative Specialists counted their cash drawers and prepared the daily deposit at the front desk after the shelter opened to the public. They did not lock their cash drawers when they were on break. The door to the safe remained unlocked and ajar during business hours. Cash for drawers not in use that day were stored in the unlocked safe. The safe sometimes contains several days of unprocessed mail receipts. Management had not changed the safe combinations in more than a year. Animal Services staff stored credit card receipts containing payment card information (PCI) in unlocked file cabinets and in open boxes atop those cabinets.

We found that Animal Services did not document the exchange of

the daily deposit between the shelter Admin and the officer or between the officer and HHS Administration. We found that HHS did not reconcile Animal Services daily receipts recorded in the general ledger to the Animal Services records of daily receipts.

We found that, officers do not issue pre-numbered receipts when accepting payments in the field, nor are those payments immediately recorded.

These practices increase the risk that cash could be lost, stolen, or incorrectly recorded or that losses would go undetected.

We recommend that Animal Services management:

- Revise cash handling policies and procedures to address cash transactions in the field, and the processing of mail payments.
- Discontinue, or increase controls over, the practice of accepting cash payments in the field.
- Change the safe combination at least once a year and following the termination of any staff with safe access.
- Establish processes and written procedures for documenting the transfers of the daily deposit between Animal Services administrative staff and animal service officers and between those officers and HHS Administration.
- Reconcile Animal Shelter daily receipts to the general ledger.
- Ensure that Animal Services staff
 - Perform all cash counts out of public view,
 - Lock their cash drawer when they go on break,
 - Securely store the beginning balance for any unused cash drawer,
 - Process mail payments on the day received, and
 - Securely store all credit card information.

OBJECTIVES, SCOPE & METHODOLOGY

We included this audit in the FY 2016-17 audit plan. We conducted this audit to address the following questions:

- Does Animal Services follow industry best practices for animal shelter operations?
- Does Animal Services comply with applicable laws?
- Does Animal Services adequately safeguard cash?

The scope of our review was Animal Services operations in FY 2016-17.

We reviewed literature and best practices for animal shelter operations and cash handling, applicable laws, shelter policies, procedures, and protocols, and recent audits of animal services in other jurisdictions. We interviewed Animal Services management, shelter staff, and field officers and observed Animal Services operations. We interviewed HHS management and staff involved in processing Animal Services daily deposit and observed that process. We reviewed Animal Services budgets and annual reports and the strategic plans of HHS and ASAP. We did not evaluate animal health or medical care provided to animals in the shelter.

COMPLIANCE WITH AUDIT STANDARDS

We conducted this performance audit in accordance with generally accepted government auditing standards, except that we have not had an external peer review. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence provides a reasonable basis for our findings and conclusions based on our audit objectives.



signed:

Audit Team: County Auditor: John Hutzler, CIA, CGAP, CCSA
Lead Auditor: Keith Shoop
Reviewer: Peter Morris, CGAP

**SUMMARY OF AUDIT
RECOMMENDATIONS**

1. Animal Services should initiate a planning process to determine how it will provide at least the minimum level of acceptable or humane care to animals in shelter (as defined by ASV Unacceptable and Must criteria) while not euthanizing healthy and treatable companion animals. As first steps in that process, Animal Services should:
 - a) assess its current capacity to provide that minimum level of care,
 - b) project the demand for shelter care,
 - c) identify the gaps between its current capacity to care and projected demand, and
 - d) identify options for reducing that gap.
2. Animal Services should license all animal rescue entities that operate within Washington County.
3. Animal Services should make available to the public a full list of animals in the custody or care of animal services or any enforcement officer.
4. Animal Services should revise its policy to clarify that staff must retain all finding reports of domestic animals for six months.
5. Animal Services management should:
 - a. Revise cash handling policies and procedures to address cash transactions in the field, and the processing of mail payments.
 - b. Discontinue, or increase controls over, the practice of accepting cash payments in the field.
 - c. Change the safe combination at least once a year and following the termination of any staff with safe access.
 - d. Establish processes and written procedures for documenting the transfers of the daily deposit between AS administrative staff and animal service officers and between those officers and HHS Administration.
 - e. Reconcile Animal Shelter daily receipts to the general ledger.
 - f. Ensure that Animal Services staff
 - i. Perform all cash counts out of public view,
 - ii. Lock their cash drawer when they go on break,
 - iii. Securely store the beginning balance for any unused cash drawer,
 - iv. Process mail payments on the day of receipt,
 - v. Securely store all credit card information.

6. HHS Administration should enable reconciliation of daily receipts to the general ledger by providing Animal Services management with a daily report of the general ledger entries for daily shelter deposits.

APPENDIX A**ASV Guidelines not followed by Washington County Animal Services**

ASV Guidelines identify “unacceptable,” “must,” “should,” and “ideal” practices for shelter operations. “Unacceptable” highlights practices that must be corrected as soon as possible to provide an acceptable level of care. A “must” indicates that without adherence to this recommendation, a shelter cannot deliver a minimum level of acceptable humane care. “Should” implies a strong recommendation. Best practices are identified in the Guidelines as “ideal” or “best.”

Management and Recordkeeping**Must**

- Protocols are developed and written down in sufficient detail to achieve and maintain the standards set by the Association of Shelter Veterinarians and updated as needed to ensure they reflect current industry norms and pertinent legislation.

Facility Design and Environment**Must**

- Shelter provides an environment that is conducive to maintaining animal health.
- Facilities are appropriate for the species, the number of animals receiving care and the expected length of stay.
- Provides sufficient space to allow each animal, regardless of species, to make normal postural adjustments (e.g. turn freely, easily stand, sit, stretch and move head without touching top of the enclosure). Animals can lie in a comfortable position with limbs extended, move about and assume a comfortable posture for feeding, drinking, urinating and defecating.
- The size of each primary enclosure is sufficient to meet the physical and behavioral parameters described in this booklet.
- Animals can sit, sleep and eat away from areas of their enclosures where they defecate and urinate.
- Mentally and physically stimulating spaces are provided.
- Animals who are housed long-term have opportunities to hide, play, rest, feed and eliminate.
- Adequate drainage is provided.
- Sound-absorbent materials are durable enough to permit

repeated cleaning.

Facility Design and Environment (cont.)

Should

- Shelter design provides for proper separation of animals by health status, age, gender, species, temperament, predator/prey status and includes sufficient space for the shelter operations described in this booklet.
- Entrances, exits, hallways and rooms are arranged so that cleaning and general movement through the facility proceeds from areas housing the most susceptible to disease and/or healthiest animals to those who are most likely to be a source of contagious disease.
- At least 10% of the facility housing capacity is made available for isolation as recommended by this study.
- Organizations that provide services to privately-owned animals separate those animals from shelter animals.
- To prevent disease transmission, enclosures permit care and cleaning without the need to remove the animals – especially important for recently admitted animals, ill animals and those younger than 20 weeks.
- Dogs and cats are able to hold their tails erect when in a normal standing position.
- Animals can see out but have some opportunity to avoid visual contact with other animals.
- Cats have a minimum of 30 cubic feet per cat and more than two feet of triangulated distance between litter box, resting place and feeding area – especially important as length of stay increases.
- Cats have high points upon which to perch.
- Cats who are housed long term are allowed access to environments where they can scratch, climb and perch.
- Floors are gently sloped to enable waste and water to run off into the drains.
- Temperature and humidity levels are evaluated at the level of the animal's body within his or her enclosure.
- Air quality is measured at the level of the animals.
- Ventilation rates are adjusted seasonally, if necessary, and are not thermostat-controlled.
- Isolation areas for dogs have separate air circulation from the rest of the facility.
- Facility is designed to offer as much natural light as possible.
- Enclosures are positioned so individual animals can avoid being exposed to excessive amounts of light or darkness.

Facility Design and Environment (cont.)

- The impact of noise is minimized through the facility design or added to the existing facility.
- Cats are not exposed to the noise of barking dogs

Ideal

- Cats are not restricted to floor level cages since this can cause stress compared to elevated cages.
- Protected indoor-outdoor access is provided for most species.

Population Management**Unacceptable**

- Operating beyond an organization's capacity for care is an unacceptable practice.

Must

- Organization practices active population management, which is one of the foundations of shelter animal health and well-being and is based on an appreciation that capacity to provide humane care has limits for every organization, just as it does in private homes.
- Organization does not exceed its capacity for care.
- Maximum housing capacity is based on the number of animals who can be adequately housed within available primary enclosures.
- Maximum housing capacity is not exceeded.
- Staffing or volunteer work hours are sufficient to ensure that the basic needs of animals in the shelter are met each day.
- The type of care and enrichment provided to sheltered animals is appropriate to the length of stay.
- Adequate staffing is available to ensure that each critical point of service (e.g. vaccination or medical evaluation, spay/neuter surgery or a physical move to adoption) is delivered promptly.
- Shelter has policies and protocols to maintain adequate capacity for care and housing.
- Policies provide a means of balancing admission with the outcomes available (e.g., adoption, transfer, release, returns to owner, euthanasia or others).
- Appropriate interventions are made before animal numbers exceed the capacity for care and housing.

Population Management (cont.)

Ideal

- Shelter maintains its populations below maximum housing capacity to allow for daily intake as well as more flexibility when choosing appropriate enclosures for each animal.
- Population statistics include an evaluation by age group, health and behavior status at intake and outcome.

Sanitation**Unacceptable**

- Kennels or cages are sprayed down while animals are inside.

Must

- Sanitation protocols include A) Removal of gross organic matter B) Pre-cleaning of surfaces with a detergent or degreaser C) Application of a disinfectant at the correct concentration and for sufficient time rinsing and drying.
- When water or cleaning and disinfecting products are sprayed in or near primary enclosures, animals are removed from the cage or kennel or separated from the area being cleaned by guillotine doors.

Should

- Housing for recently admitted or ill animals and those who are younger than 20 weeks is designed to permit cleaning without extensive handling of the animal or removal to an area that has not been sanitized.
- Sinks are available in all animal housing and food preparation areas.
- Access to areas that cannot be disinfected are restricted to animals who appear healthy, have been vaccinated and dewormed and are five months or older.
- Standing water is not allowed to accumulate in areas around the shelter.

Ideal

- Food and water receptacles are cleaned in an area separate from litter boxes or other items soiled by feces.

Medical Health and Physical Well-being

Should

- Stored food is clearly labeled if removed from the original packaging.
- Even animals with mild clinical signs of contagious disease are not housed in the general population.
- A consistent diet is fed to all animals, rather than a variety of products.

Ideal

- Food and water receptacles are cleaned in an area separate from litter boxes or other items soiled by feces.
- Shelters monitor and assess frequency of specific problems, set realistic goals, develop targeted strategies and monitor effectiveness of medical health programs.

Behavioral Health and Well-being

Unacceptable

- Animals confined on a long-term basis, including feral or aggressive animals, are stressed during basic care, daily enrichment and exercise.

Must

- If many animals are displaying signs of unrelieved stress, steps are taken to improve the shelter's stress reduction protocols.
- Even short-term housing meets the minimum behavioral needs of animals, providing separate areas for urination/defecation, feeding and resting and sufficient space to stand and walk several steps and sit or lie at full body length.
- For long-term shelter stays, appropriate levels of additional enrichment are provided on a daily basis.
- Alternatives to traditional cage housing are provided for any animal staying in the shelter long-term.
- Cats are allowed an opportunity to exercise and explore in a secure, enriched setting.
- Dogs are provided with daily opportunities for activity outside of their runs for aerobic exercise.
- Sufficient resources are available to provide appropriate care if behavioral modification is attempted.

Behavioral Health and Well-being (cont.)**Should**

- During intake procedures, particular care is taken not to place cats within spatial, visual or auditory range of dogs.
- Staff records their behavioral finding each day.
- Prey species are housed away from predatory species at all times.
- Cats are physically separated from the sight and sound of dogs.
- Scheduling daily positive events is a priority.
- Enrichment is given the same significance as other components of animal care, such as nutrition and veterinary care, and is never considered optional.
- Socialization is provided by workers or volunteers wearing clean protective clothing in an environment that can be fully disinfected between uses.

Ideal

- Shy, poorly socialized, feral and geriatric cats – or any animal who is showing signs of stress – are housed in separate, calm, quiet areas beginning at intake.
- Caregivers are assigned to care for the same animals on a regular basis.

Euthanasia**Must**

- Staff performing euthanasia wears protective garments, which are removed before going on to other animal care duties.

Should

- A separate room is designated for euthanasia in a quiet area away from the main pattern of foot traffic, to minimize distractions and interruptions.
- Animals are not permitted to observe or hear the euthanasia of another animal, nor permitted to view the bodies of dead animals – with the exception of puppies and kittens. When selected for euthanasia, mother animals are euthanized prior to their offspring with the puppies and kittens euthanized immediately afterward.
- Training for field euthanasia is provided.

Euthanasia (cont.)

- Retraining and recertification are provided periodically, with support services offered to staff to prevent or manage suffering from grief, compassion fatigue, depression or other physical and emotional reactions related to performing euthanasia.

Spaying and Neutering**Must**

- Appropriate housing is provided for each animal before and after surgery.
- Enclosures are secure and provide a flat surface that is clean, dry and warm with adequate space for the animal to turn around, while allowing for safety at various stages of sedation and anesthesia and good visibility for staff.

Animal Transport**Should**

- Animals are identified by a collar, tag, tattoo, microchip or any combination of these methods so that their information can be matched upon arrival.
- Absorbent bedding is provided.
- A thermometer is placed in the animal area of the vehicle at the level of the animals.

Public Health**Should**

- Eye protection is worn when working with cleaning and/or disinfection agents.
- Shelter provides periodic staff and volunteer training and information on the recognition of potentially zoonotic conditions and the means of protecting others from exposure.
- The public does not have unsupervised access to areas where animals are isolated for zoonotic diseases and staff access to those areas is also limited.
- Food and drink are not consumed in areas where animals are housed; use of items the public may bring in – such as spill-proof cups, pacifiers, teething toys and baby bottles – is discouraged in these areas.

Public Health (cont.)

- Shelter-provided literature about zoonotic diseases suggests that immune-compromised adopters discuss pet selection with their healthcare professional before adoption.
- People who routinely work with companion animals or wildlife receive pre-exposure vaccinations against rabies in accordance with recommendations of the Advisory Committee in Immunization Practices.

Ideal

- Hand washing stations or sinks are easily accessible to all visitors, staff and volunteers.
- The written infection control plan for the shelter addresses zoonotic concerns and is available to all staff and volunteers.



WASHINGTON COUNTY

OREGON

December 29, 2017

TO: John Hutzler, County Auditor

FR: Robert Davis, County Administrator *RD*
Sia Lindstrom, Sr. Deputy County Administrator *SL*

RE: Response to Audit of Animal Services

We have reviewed your Audit of Animal Services dated December 8, 2017, and have worked with the Department on the attached response. As noted, we generally agree with your findings and mostly agree with your recommendations.

Thank you for your work on this audit. We believe the actions that we will take based upon your work will result in improvements to our programs and services. Please let us know if you have any questions and/or would like a follow-up meeting.

Cc: Marni Kuyl, Health & Human Services Director
Randy Covey, Animal Services Manager

County Administrative Office

155 North First Avenue, Suite 300, MS 21, Hillsboro, OR 97124-3072
phone: 503-846-8685 • fax: 503-846-4545



December 29, 2017

TO: Bob Davis, County Administrator
Sia Lindstrom, Sr. Deputy County Administrator

FROM: Marni Kuyl, Director
Department of Health and Human Services

SUBJECT: HHS RESPONSE TO THE ANIMAL SERVICES AUDIT

Overview:

We have reviewed the Animal Services audit report and are providing a response from the Department of Health and Human Services (HHS).

We appreciate the work the auditor undertook to assess the important services provided within the Animal Services program. HHS values continuous quality improvement and the recommendations in the report support our intention to ensure we provide quality services throughout HHS. We generally agree with the audit report and our response below describes our intentions for addressing each recommendation and our plan for accomplishing the improvements where applicable.

Significant milestones to date include the following:

1. We have contracted with a consultant to work with HHS and Facilities to explore options for updating our aging facility.
2. We have drafted a policy and procedure for licensing all animal rescue entities in Washington County.
3. We have updated the Animal Services policy 107 and instructed staff to maintain the records of reported domestic animal findings for six months and make them available for public inspection.
4. We have improved cash controls:
 - a. Changed our hours of operations to ensure staff performs the morning cash counts out of the public view. We provided clear direction to staff and they are complying with all cash handling procedures as described in your findings.
 - b. Changed the safe combination and have reviewed the policy and procedure with staff.
 - c. Exploring changes to field collection of cash and the transfer of cash, checks and receipts with Finance.

Background:

As noted in the report, Animal Services takes pride and is responsible for enforcing the Washington County Animal Services code including licensing dogs, investigating animal abuse, sheltering stray animals and returning lost pets to their owners. The manager, supervisors and all staff are deeply committed to ensuring humane care and treatment of animals as well as protection of the public from zoonotic public health risk, dangerous dogs and rapid response to animal cruelty.

As a founding member of the Animal Shelter Alliance of Portland (ASAP) we are also familiar with and committed to striving toward excellence in shelter operations by implementing to the best of our ability, based on staff, facility and other resources both the Asilomar Accord standards and the Association of Shelter Veterinarian (ASV) guidelines.

We accomplish these goals by supporting a competent workforce (including volunteers), participating in the ASAP, and engaging and participating as leaders in national shelter and animal welfare groups such as National Animal Care and Control Association (NACA). Although we are not able to meet every ASV shelter guideline, our policies, procedures and practices provide appropriate mitigation to ensure humane treatment of all animals that is balanced with a safe environment for our staff, volunteers, visitors and the animals.

Response to the Audit Recommendations:

1. **Audit Recommendation #1** – Animal Services should engage its stakeholders in a strategic planning process to determine the resources (facility, staff, and volunteers) required to operate a shelter in accordance with both the Asilomar Accords and the ASV Guidelines. The plan should identify specific strategies and target dates for developing those resources.

Response:

Animal Services has contracted with a consultant to research models for developing an Animal Services capital campaign fund and financing improvements to shelter operations stemming from the limitations of our aging facility. The consultant will work with HHS, the Animal Services manager and Facilities. The purpose of exploring this option is to address facility constraints that affect our ability to meet the Asilomar and ASV guidelines. The consultant will research private, non-profit, and governmental and partnership models for both raising capital funds, and financing and operating a shelter. The consultant's report due June 2018, will describe the pros and cons of various capital development, governance, and operational implementation.

A next step to the consultant's report is to review the report, evaluate what options are feasible in Washington County, and develop a plan for exploring the recommendations with the County Administrative Office (CAO), the Board of Commissioners and the public. The areas for improvement outlined in this report from the ASV guidelines will provide specific areas the plan should address. Ultimately, CAO and the Board of

Commissioners will be asked to provide direction based on the recommendations and will need to balance this project against competing resource needs of the organization.

2. **Audit Recommendation #2** – Animal Services should license all animal rescue entities that operate within Washington County.

Response:

Animal Services has a draft policy and procedure for ensuring all animal rescue entities are licensed. The HHS director and County Council will review the policy. Once approved, we will work with the HHS communications coordinator to develop an outreach and communication plan, train staff and begin implementation of the policy in 2018. The entire Animal Services Code was recently updated, after 30 years, to reflect modern animal care and control practices. Many positive changes have already been implemented including Dangerous Dog regulations, animal abuse and neglect investigations, and impound, stray hold, and lost and found protocols. The regulation of animal rescue entities is the last of many positive changes related to our Animal Services Code update and is based on a relatively new state requirement. We have been working with our peers and colleagues in neighboring counties to ensure smooth coordination of efforts when licensing and inspecting entities that cross jurisdictional boundaries.

3. **Audit Recommendation #3** – Animal Services should make available to the public a full list of animals in the custody or care of Animal Services or any enforcement officer.

Response:

As noted in the report, Animal Services does maintain two public listings of animals. These two lists exist on Pet Harbor and Pet Finder. On Pet Harbor, people can search for impounded animals waiting to be redeemed by their owners as well as animals that have become the property of the shelter and are available for adoption. Pet Finder is an additional listing of the animals that have become the property of the shelter and are currently available for adoption. Although we maintain records of impounded animals that are held pending court hearings, dangerous dogs, or animals held under rabies quarantine, we have not made these records immediately available to the public when their owners are known (and aware of their own animal's status) or there are extenuating circumstances that would put the animals, the facility or the staff at risk. Additionally there are animals temporarily held in custody by field officers, but returned to their owners without ever going to the shelter. These animals are not currently, as noted in the report, included on the public listing.

In the next three months, we will obtain a legal consultation from County Council regarding public disclosure of animals impounded while awaiting court hearings, deemed as dangerous or in rabies quarantine. After legal counsel, we will develop a plan to clarify what information about impounded animals can be released and under what circumstances. Depending on the outcome of the consultation we may need to update Animal Services policy or the Washington County Animal Code.

4. **Audit Recommendation #4** – Animal Services should revise its policy to clarify that staff must retain all finding reports of domestic animals for six months.

Response:

Animal Services has completed this recommendation. The policy is updated, staff is trained and the records are being retained for six months.

5. **Audit Recommendation #5** – Animal Services management should:
 - a. Revise cash handling policies and procedures to address cash transactions in the field and the processing of mailed payments.
 - b. Discontinue, or increase controls over, the practice of accepting cash payments in the field.
 - c. Change the safe combination at least once a year and following the termination of any staff with safe access.
 - d. Establish processes and written procedures for documenting the transfers of the daily deposit between Animal Services administrative staff and Animal Services officers and between those officers and HHS administrative services.
 - e. Reconcile daily receipts to the general ledger.
 - f. Ensure that Animal Services staff perform all cash counts out of public view, lock their cash drawer when they go on break, and securely store the beginning balance for any unused cash drawer.
 - g. Process mail payments on the day of receipt; securely store all credit card information.

Response:

The Animal Services manager addressed many of these findings as each was identified during the audit. Some will need to be reviewed further and new policies or procedures will need to be adopted and implemented.

- 1) We are reviewing options for cash handling in the field. Options include discontinuing this practice or developing procedures to minimize the risk of handling cash in the field. A decision and appropriate policies and procedures will be implemented by June 2018.

We will review and revise the policy for processing mailed payments by March 2018.

- 2) See above (a).
- 3) Animal Services has implemented this recommendation. We reminded supervisors and staff of this policy. We changed the safe combination when this lapse was identified and will change the combination each time staff leaves the program for any reason. The administrative specialists and their supervisor are aware that the safe combination is to be changed annually (per electronic

calendar reminder), and any time that there is a change in staff that had access to the safe. The protocol is also in the Administrative Manual.

- 4) Animal Services and HHS administrative services staff will develop a plan to document secure transport and reconcile daily deposits with County Finance. We anticipate finalizing a plan within three months and implementing the plan after training staff by July 2018.
- 5) The difficulty with reconciling daily receipts is that Animal Services accounts for (but does not receive) on-line payments when notified by Finance that they have been received. Mailed payments are received in-person at the Animal Services building. Finance receives the on-line payments and reports them to HHS administrative Services and Animal Services. As a separate action, Animal Services staff transports the in-person or mailed payments to HHS administrative services each workday. HHS administrative services does not receive the in-person or mailed payments for a particular day on the same day they were received by Animal Services. These two payment methodologies (online payments accounted for by Animal Services, and in-person or mailed payments actually received by Animal Services) are combined to the general ledger. HHS administrative services will work with Finance to explore options and consider changes if feasible. We will complete the evaluation by June 2018.
- 6) The morning cash count is performed out of the public view. We are now opening to the public half an hour after the administrative staff arrive which gives them time to complete the AM cash count. Staff are currently locking cash drawers whenever they are not at their station and securely storing all cash, including the beginning balance.

Regular monitoring protocols to ensure compliance include regular communication between staff regarding the basic safeguards and regular check-ins from supervisory staff, who have provided clear expectations and guidance both verbally and in writing. We are exploring the potential of closing at 5:30 p.m. in order to allow cash counts at the end of the day, out of public view. We will make a final decision in the next 60 days.

- 7) This improvement was made as soon as it was identified during the audit. All staff has been reminded of the importance of cash handling, reviewed the policies and are now complying with the Finance and Animal Services cash handling policies and procedures, including processing or securing mail payments each day and securing all credit card information.

6. **Audit Recommendation #6** – HHS administrative services should enable reconciliation of daily receipts to the general ledger by providing Animal Services management with a daily report of the general ledger entries for daily shelter deposits.

Response:

See the response to audit recommendation 5, 5).

Auditors' Addendum

We wish to thank the Animal Services Manager and staff, the Director of Health and Human Services, and the County Administrative Office for their assistance with this audit.

In its response, management indicates that it generally agrees with our findings and mostly agrees with our recommendations. Management's response provides reasonable assurance that Recommendations 2 through 6 have either already been implemented or will be implemented within 6 to 12 months.

However, the response does not provide reasonable assurance that Animal Services will refrain from certain practices that the Association of Shelter Veterinarians' (ASV) considers unacceptable or implement certain practices that ASV identifies as mandatory if a shelter is to deliver a minimum level of acceptable humane care (Recommendation #1). We informed management that its response to the first recommendation did not adequately address the conditions underlying the audit finding and recommendation.

The County Administrator expressed concern that our first recommendation would require a countywide facility master planning process that the CAO was not prepared to undertake at this time. We explained that it was not our intention to recommend such an undertaking. We did not recommend construction of a new animal shelter because we believe the division should first explore the full range of options for accomplishing its dual goals of providing humane care to sheltered animals and not euthanizing healthy animals. Other options might include, for example:

- reducing shelter populations by increasing the number of adoptions, transfers to other facilities, and foster care placements,
- acting more quickly on such dispositions to reduce the length of time animals are held in shelter,
- adding or reallocating staff or volunteers to increase the shelter's capacity to care for animals, especially during population peaks.

We directed our recommendation to Animal Services management with the expectation that the manager of that division is responsible for planning how it will accomplish its mission.

We revised the recommendation to clarify the planning steps that the Animal Services Manager should perform before involving other County departments, and requested a response that more specifically addresses the recommended division-level planning. Management declined to revise its response. As a result, the language of Recommendation #1 in the audit report and the response do not match.



John Hutzler, CIA, CGAP, CCSA
County Auditor