



# OFFICE OF INTERNAL AUDIT

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## REPORT TO THE BOARD OF SUPERVISORS

Pinal County

Health and Human Services Department

Animal Care and Control Division Audit

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**Attachments:**

**A. Animal Control dispatch area boundaries**

**B. Management Response and Action Plan**

## Executive Summary

The Pinal County Office of Internal Audit has completed an operational audit of the Animal Care and Control division of the Pinal County Health and Human Services department as part of our FY 2010/11 annual audit plan approved by the Pinal County Board of Supervisors. The audit was planned and conducted in accordance with Generally Accepted Government Auditing Standards.<sup>1</sup> These standards require we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusion based on our audit objectives.

The objectives of our audit were to:

- Assess health, safety, and overall working conditions to ensure achievement of departmental goals.
- Review the Rabies Protection program to determine compliance with applicable state statutes.
- Evaluate euthanasia services and safeguarding of controlled substances to determine compliance with all applicable federal and state statutes.
- Analyze accounting and billing processes to determine if they are adequate to ensure compliance with all applicable state statutes and current ordinances, and support efficient and effective operations.

After conducting this audit our overall conclusion is Pinal County Animal Care and Control (Animal Control) Management needs to significantly improve operating efficiency, employee safety and employee morale. The following are some of the more salient findings:

- Animal Control is experiencing high staff turnover for Animal Control Officers, and 75% of the County has been left with limited or no field services.
- Inadequate supervision, training, equipment and communications are creating a safety risk for Animal Control Officers.
- Lack of administrative support is significantly limiting Field Services personnel's ability to perform field duties.
- Pre-rabies vaccinations for Animal Control Officers were not provided in a timely manner.

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<sup>1</sup> <http://www.gao.gov/govaud/ybk01.htm>

- Euthanasia policies and procedures are not adequate to ensure services are performed correctly and safely for the animals or Animal Control Officers involved.
- Cash handling procedures have improved but are still not adequate to ensure proper controls are in place to prevent possible misappropriation of funds.
- Animal Control has not developed uniform policies for IGA contracts and billing formulas.

Key recommendations include the following:

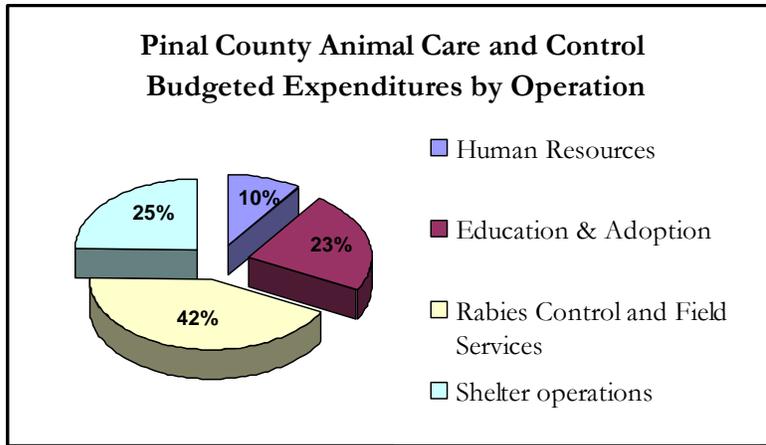
- *Develop comprehensive policies and procedures for all Animal Care and Control functions*
- *Conduct a complete review of field services operations and develop comprehensive and uniform Animal Control Officer training*
- *Complete a comprehensive health and safety review, including analysis of the overall environment and equipment, incorporating all areas of operations*
- *Consider using a professional services contract for euthanasia services*
  - *Conduct a thorough review of current practices and develop comprehensive euthanasia procedures, following National Animal Control Association guidelines, and include use of disposable animal identification (ID) collars and reconciling of controlled substances used with controlled substances dispensed*
- *Develop an Intergovernmental agreement policy and establish uniform billing practices*
- *Review facility, equipment and communication needs at the San Manuel shelter*
- *Regularly benchmark current practices with those of other Animal Control facilities in Arizona, to ensure use of current and best practices when financially feasible*

We would like to thank the Management and staff of the Pinal County Animal Care and Control Division for their assistance and cooperation during the course of this audit. The following report provides additional details of our audit observations and recommendations.

Lori Stripling  
Pinal County Internal Audit Officer

## **Background**

Pinal County Animal Care and Control (Animal Control) is a division of the Pinal County Health and Human Services Department. The mission of Animal Control is to provide rabies control, enforcement, protection, education, and adoption services to Pinal County residents, so they can live in a community that promotes responsible pet ownership and are protected from diseased or aggressive domestic animals<sup>2</sup>.



By law, financing for Animal Control services is provided by apportioning a share (1.55%) of the County's primary property tax base into a special revenue fund.<sup>3</sup>

Property taxes collected for Animal Control in FY2010 were \$1,443,844. In addition to these funds, Animal Control is authorized to collect fines and fees for services. The FY2011 adopted budget for Animal Control is \$1,911,735, which includes operating, debt service and capital improvement project funds.

Animal Control has an authorized staff level for FY2011 of 28.5 full-time equivalents organized into four sections, which include Administration (includes Dispatch); Rabies Control and Field Services; Shelter Operations; and Education and Adoption.

Also, several cities<sup>4</sup> in Pinal County have signed Intergovernmental Agreements (IGA) with Pinal County Animal Control and may collect pet license fees, hire Animal Control Officers to patrol within city limits, or utilize shelter services provided by Pinal County Animal Control.

<sup>2</sup> [http://www.pinalcountyz.gov/Departments/MFR/Documents/BusinessPlans/FY2010-2011/Animal%20Care\\_and\\_Control%20SBP\\_FY10\\_11\\_Final\\_02232010.pdf](http://www.pinalcountyz.gov/Departments/MFR/Documents/BusinessPlans/FY2010-2011/Animal%20Care_and_Control%20SBP_FY10_11_Final_02232010.pdf)<sup>2</sup>

<sup>3</sup> ARS 11-1011 – Rabies Control Fund

<sup>4</sup> Casa Grande, Apache Junction, Eloy, Coolidge and Maricopa

## **Audit Objectives**

- Assess health, safety, and overall working conditions to ensure achievement of departmental goals
- Determine compliance with applicable ordinances, state statutes and Intergovernmental Agreements (IGA)
- Evaluate internal controls over cash receipting and enforcement processes
- Evaluate Animal Control euthanasia services
- Evaluate safeguarding of controlled substances and department assets
- Evaluate the Animal Care and Control rabies prevention program

## **Audit Scope**

The scope of our audit is to determine if internal controls are adequate to ensure efficiency and effectiveness of operations, protection of assets, proper allocation and use of resources, and the achievement of departmental goals.

## **Audit Methodology**

The following methodologies were used to complete the audit:

- Examined written policies and procedures for all processes under review
- Interviewed various Animal Control employees within administration, field, kennel and veterinary operations
- Identified and tested key internal controls over cash receipting, controlled substances, field operations and animal euthanasia
- Observed administrative, field and kennel operations
- Reviewed Intergovernmental agreements for Animal Control services
- Surveyed other municipalities regarding adoption fees, impoundment fees, and fines
- Visited and observed other local County Animal Control operations
- Created an employee satisfaction survey to solicit feedback from Animal Control services employees

## SUMMARY OF AUDIT FINDINGS AND RECOMMENDATIONS

### Overall Conclusion

Our overall conclusion is Pinal County Animal Care and Control (Animal Control) Management needs to significantly improve operating efficiency, accuracy and effectiveness, as well as employee safety and morale.

In the past year, Internal Audit received numerous Silent Whistle reports regarding various incidents at Animal Control. In response to these reports, the Pinal County Human Resource (HR) department conducted an investigation at Animal Control and issued a memo<sup>5</sup> stating there was, "...merit to allegations of Code of Conduct violations," by Animal Control Management. HR recommended a performance improvement review for the Animal Control Director and disciplinary action and possible demotion or termination for Field Supervisors.

More recently, an independent third party was hired to investigate the August 9, 2010 termination of a Pinal County Animal Control Officer. As a result of that investigation, and on the advice of an attorney, the terminated employee was reinstated to her position with full back pay on October 19, 2010.

It was evident during our audit that these occurrences, and other alleged incidents reported by employees, have disrupted business operations and further deteriorated employee morale.

According to 2009 information, the turnover rate at Animal Control was nearly seventy percent (70%).<sup>6</sup> At the present time<sup>7</sup>, the active staff level in the Field Services operation has fallen below 40% and, based on discussions with current employees, may fall lower in the near future.

Information supporting our overall conclusion is discussed in the following report section titled **Audit Results by Area of Operation**.

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<sup>5</sup> June 15, 2010 memorandum to Lisa Garcia, ACM Health and Human Services RE: Allegation of Code of Conduct and Workplace Violence Violations

<sup>6</sup> 2009 statistics as computed by Pinal County Human Resource personnel assigned to Health and Human Services

<sup>7</sup> November 17, 2010

## AUDIT RESULTS BY AREA OF OPERATION

### Rabies Control and Field Services

The purpose of the Rabies Control and Field Services program is to provide investigation and prevention services to Pinal County residents so they can live in a community protected from rabies exposure and nuisance animals. According to Animal Control's Managing for Results (MFR) activity reports for FY2010/11, Field Services expected to conduct four hundred fifty (450) rabies exposure investigations and respond to over eleven thousand five hundred (11,500) field service calls. Internal Audit compiled an activity report using information on the Animal Control computer system and determined actual calls responded to from October 1, 2009 to September 20, 2010 were twelve thousand eight hundred and thirty-six (12,836).

According to the adopted budget for FY2011, Rabies Control and Field Services' (Field Services) budgeted expenditures are \$810,196,<sup>8</sup> or 42% of total expenditures.

Field Services is charged with maintaining a staff of Animal Control Officers (ACO's) ready to travel to any area in the County (a service area of over 5,370 miles) 24 hours a day, 365 days a year. Animal Control has divided the County into ten (10) ACO dispatch areas (See map Appendix A). All Officers, with the exception of the two (2) Officers stationed in the San Manuel area, start their daily shifts from the main facility at Eleven Mile Corner in Casa Grande, and travel to their various designated dispatch areas within the County. ACO's dispatched from the main facility work staggered, rotating nine (9) hour shifts Monday through Friday, with the first shift covering 7am-4pm and second shift covering 10am-7pm.

First shift Officers perform euthanasia duties on Monday, Wednesday, and Friday, before they are available for field duties (these duties are discussed in detail in Section E of this report). Second shift Officers remain on-call after their daily shift and on weekends. The two ACO's in San Manuel rotate shifts, days, and on-call duties to sufficiently cover all hours.

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<sup>8</sup> <http://www.pinalcountyz.gov/Departments/BudgetOffice/Documents/Downloads/FY%202010-2011%20ADOPTED%20BUDGET%2010.25.10.pdf>

Additional Animal Control Officers' duties include preparing for court and civil hearings (these duties are discussed in detail in section D of this report) and operating weekly pet licensing clinics in their respective dispatch areas.

**A. Animal Control is experiencing high staff turnover for Animal Control Officers and 75% of the County has been left with limited or no field services.**

For several years, Animal Control has had a difficult time maintaining approved staff levels. An analysis performed by Pinal County Human Resources staff in 2009 confirmed Animal Control had a staff turnover rate of seventy percent (70%). There are thirteen and one-half (13½) approved ACO positions for Animal Control and, at the start of our audit, two and one-half (2 ½) positions were vacant.

In the month between October 20, 2010 and November 20, 2010, an additional six (6) Animal Control Officers quit, were terminated or went on extended leave. The Officer on extended leave subsequently quit and, as of November 20, 2010, there were five (5) active Animal Control Officers. Two (2) of these Officers are stationed in San Manuel and one (1) Officer works only within the city limits of Maricopa. The remaining two (2) Officers are responding to dispatch calls for the rest of the County.

The Field Services Supervisor acknowledged chronic staff shortages have increased the difficulty of scheduling officers for after hours and weekend emergency calls in high demand areas. Critical staff shortages have also made it difficult to manage sick and vacation leave requests and, in an attempt to control over-time hours, Management has asked ACO's to take time off during regularly scheduled work hours to compensate for any on-call hours worked on nights and weekends. This scheduling substitution is causing additional staff shortages in high-demand areas during day shifts and affecting other critical areas (see Euthanasia, Section D).

At the start of this audit, Internal Audit distributed an anonymous employee survey to all Animal Control employees. Employees were asked if they agreed with the statement: "Department leadership responds to important internal issues (morale, working conditions, discrimination, etc.)." Fifty percent (50%) of the employees responding either disagreed or

strongly disagreed with this statement, and seven percent (7%) were neutral, indicating many Animal Control employees have lost confidence in the ability of management to respond to important issues.

Forty-seven percent (47%) of respondents disagreed or strongly disagreed with the statement: “Overall safety within Animal Control is adequate.” Forty-three percent (43%) responded they disagreed or strongly disagreed with the statement: “I have adequate information, training and resources available which enable me to do my job well,” while an additional 21.4% were neutral.

Internal Audit analyzed staff levels to determine if staff levels were adequate to effectively operate field services. The National Animal Control Association<sup>9</sup> (NACA) offers guidelines for determining the number of staff needed and consider officer safety and security, time spent on investigations, and preventive patrol time. Guidelines include assessing the number of citizen calls, officer-initiated calls, citations and agency assists. In Pinal County, additional consideration was included for distances within service areas and required travel time to the Eleven Mile main facility.

Officer hours available to work		Officers needed to respond to annual dispatched calls	
Total available	2,080		
Vacation*	(80)		
Sick*	(104)		
Holidays	(80)		
Training	(80)		
Hearing/Court (8 hrs /month)	(96)		
Miscellaneous/paperwork (1 hour per day x 42 weeks)	(210)		
Travel time from field service areas	(210)	# of dispatched calls from October 1, 2009 to September 20, 2010	12,836
Euthanasia (2.5 hours x 3 days a week x 21 weeks)	(158)	NACA benchmark calls per hour (changed from 1.5 to 1.25 to adjust for larger service areas in Pinal County)	1.25
Sub Total	(1,018)	Time (hours) needed to respond to calls	10,268.80
Adjusted hours available to work in the field	1,062	Divided by hours available to work	1,062
% of time in the field	51.06%	# of Animal Control Officers needed to respond to current call volume	9.66

<sup>9</sup> The NACA formula for determining # of ACO's per service area using the 'relief factor' is 1.6 ACO's for each service area (1.6 X 10 = 16 ACO's)

Based on this analysis<sup>10</sup>, the *authorized* field staff level is higher than recommended; however, the actual staff level is much lower. Due to lack of adequate supporting documentation, this analysis does not include nights and weekend on-call services performed. Initial vacation and sick leave were used for these calculations. Vacation and sick leave usage varies by Officer, depending on seniority. For example, three ACO's have worked for the County over 10 years and each used an average of 246 vacation leave hours in 2009.

### Recommendations

1. *The Animal Care and Control Director should conduct a complete review of field service operations, focusing on improving working conditions for Animal Control Officers and increasing service hours out in the field. Areas of the review should include:*

- *Determining the optimum level of staff needed to respond promptly to all priority service calls within each service area.*
- *Determining the most efficient service area boundaries, utilizing a consistent formula for apportionment.*
- *Determining the most effective method for managing after business hours calls, to include possibly hiring a second shift ACO to perform night and/or week-end calls in high-demand areas. This would allow ACO's in those areas to work full day schedules.*
- *Determining the most effective parking locations for work vehicles, to eliminate wasted time and fuel commuting to service areas. This would most likely be a current County facility within each assigned service area.*

### **B. Inadequate supervision and training are creating safety risks for Animal Control Officers**

Animal Control Management has not developed a comprehensive and consistently supervised training program for Animal Control Officers. The Animal Control Field Supervisor explained current training for ACO's consists of probationary ACO's reading

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<sup>10</sup> This methodology uses the NACA 'call per hour' formula of 1.25 calls per hour

appropriate laws and regulations; watching training videos; and participating in observation/assist opportunities for euthanasia and field services.

Upon request for documentation of training provided to current ACO's, the Field Supervisor provided Internal Audit with a blank forty-six (46) item *Officer Training Status* checklist. When asked to provide completed checklists for all ACO's, Internal Audit received one partially completed checklist for one ACO. The Field Supervisor admitted Animal Control has not maintained lists for any other ACO training. Also, Internal Audit asked Animal Control Management to provide documentation for "observation/assist" training for euthanasia and field services completed by current ACO's. No additional documentation was provided.

According to interviews with ACO staff, training for field services is informal and variable. When asked how they were trained to perform euthanasia or field service, all ACO's interviewed answered, "It depends on who is doing the training."

Internal Audit confirmed there is no formal evaluation process to verify training is completed before an employee reaches the end of his/her probationary period or is sent out to perform duties alone. Additionally, the length of time before probationary ACO's are sent out to perform field and euthanasia services alone varies considerably.

### *Recommendations*

#### *2. The Animal Care and Control Director, and Field Supervisors, should develop a comprehensive program for ACO training that requires:*

- *All training must be completed, and documented, before the Officer is allowed to perform duties alone. This information should be maintained in an employee file.*
- *A Field Supervisor, or adequately trained designee, must accompany all Animal Control probationary officers on patrol for a designated period of time before they are released for solitary duty. A release for duty should be documented by the Supervisor and the ACO.*

- *The Director, and the Field Supervisor, per discretion allowed by Pinal County Merit Rule 11.2, should extend any ACO's probation beyond the current six (6) month period if needed, "to properly assess the employee's suitability for their new position." Animal Control Management was not aware of this provision.*
  - *All continuing professional education should be fully documented by the Field Supervisor and the ACO.*
3. *The Animal Care and Control Director should review Field Supervisor duties and determine the most advantageous training structure. For example, one Field Supervisor could be assigned ACO administrative and operational training duties, while the other supervisor is assigned field staff training.*
  4. *The Animal Care and Control Director should assign adequate and appropriate administrative support staff to the Field Services operations.*

**C. Lack of adequate equipment and inefficient communication are creating safety risks for Animal Control Officers**

The department has developed an Animal Control Officer (Equipment) Inventory list to document county equipment issued to ACO's; however, the example list provided by Field Services Management did not include the ACO's actual signature. In the space provided for the ACO signature was a typed response "On File in officer personal file." Also, not all equipment on the list was checked as issued. Safety vest and tranquilizer equipment were not checked.

Some ACO's reported they were never issued basic equipment (safety vests<sup>11</sup>, etc.), or they were issued inadequate equipment (small flashlights vs. large flashlights, etc.). Some ACO's reported they had been issued dart guns but could not use them because they had not received the required training.

Equipment recommended by the National Animal Control Association and the Field Supervisor, and not on the list, included a basic first aid kit; road flares; large flashlight; fire extinguisher; and a ballistic protective vest for applicable service areas.

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<sup>11</sup> For ACO's dispatched to accident scenes on busy highways or crime scenes to impound animals

Also, when ACO's are working in their assigned field service areas, communication with Field Supervisors is difficult and limited. Field Supervisors cannot respond to radio calls with ACO's because Field Services Dispatch personnel and call equipment is located in a different building. Radio calls with Field Services dispatch personnel are required to be limited to only exchanging immediate call information, and Field Supervisors have a receiver in their area to hear radio communications.

Dispatch personnel conclude their work day at 6pm; one hour before ACO's complete their shift at 7pm. If an emergency occurs after 6pm, there is no opportunity to communicate with Field Supervisors or Animal Control management. If ACO's need to communicate with Field Supervisors during regular shift hours to obtain additional timely instruction, gain permission to use their dart gun, or field euthanize an injured animal, they must use their personal cell phones. ACO's reported they have incurred large cell phone bills that were not reimbursed by Animal Control.

Additionally, calls received from citizens reporting animal control concerns are routed through the Pinal County Citizen Contact Center. The computer software used by the Contact Center (Lagan) is not compatible with the computer software used by Animal Control (Chameleon); therefore, dispatch personnel must manually re-enter call center information into the system used by Animal Control field officers.

Animal Control Officers also stated they were entering private backyards when the homeowner was not home, after receiving calls from residents to pick up reported stray animals. Internal Audit discussed this practice with Pinal County Risk Management to determine if the practice raised possible liability concerns, for example, by entering the wrong property or picking up the wrong animal.

Also, this practice may not comply with ARS 11-1026 which states, "A person is lawfully in or on the private property of the owner of a dog ... when an invitee or guest..."

Animal Control does not require ACO's to obtain written documentation for these property owners' requests, and Risk Management advised that Animal Control immediately discontinue this practice or require receipt of a signed/written invitation from the property owner, before entering private property; unless an animal is in obvious imminent danger.

### Recommendations

5. *The Animal Care and Control Director, and Field Services Management, should ensure no officer is allowed to work in the field without complete and documented training and equipment. All issued equipment forms should be personally signed by the receiving ACO, acknowledging receipt of the equipment listed.*
  6. *Field Services Supervisors should ensure no ACO's enter private property to retrieve a reported stray animal when the owner is not present without the written consent of the property owner; unless an animal is in eminent danger.*
  7. *The Animal Care and Control Director, and Field Supervisors, should regularly review the equipment issued to ACO's and determine if the equipment is adequate to maintain a safe working environment. The Humane Society of the United States provides recommended field services safety equipment guidelines.*
  8. *The Animal Care and Control Director should ensure all ACO's are provided a means of communicating with Field Supervisors during any and all field service duties.*
  9. *The Animal Care and Control Director should consider relocating Dispatch personnel to the ACO/Field Services building, to allow them to provide support for Field Services personnel and work the same shift hours as field services personnel. This change in staffing would provide needed administrative support, facilitate communication between Field Supervisors and ACO's, and allow ACO's more time in the field.*
- D. The lack of administrative and/or legal support, to help prepare documentation for legal proceedings and complete sizeable daily paperwork, is significantly limiting Field Services personnel's ability to perform field duties.

Animal Control Management has not assigned any administrative support staff to assist with Field Services operations. Field Services Dispatch personnel, located in the administration office, are instead required to use time between dispatch calls to answer Animal Control office phones, prepare Treasurer Deposits, and perform other administrative duties for front office personnel.

At the time audit fieldwork was conducted, there was only one (1) Field Supervisor in Animal Control Field Services. The Supervisor was responsible to conduct training for all ACO's, maintain all training paperwork, conduct all criminal investigations and develop and conduct an early disposition education course. The Field Supervisor also responded to five hundred and forty-five (545) field service calls between October 1, 2009 and September 30, 2010.

ACO's are required to manually document all citations, field services calls, kennel inspection activities, euthanasia details, and all information, as needed, for criminal and civil hearings. According to interviews with ACO's, daily completion of this paperwork can take several hours and needs to be completed before the Officer can begin field service calls. Only one field truck, provided by the city of Maricopa, is equipped with an on-board computer to immediately input field report information.

ACO's stationed in San Manuel do not have suitable computer equipment in their office to prepare and submit paperwork online and are going to other county offices in the area and using their computer equipment to complete and submit paperwork.

All Animal Control Officers are expected to attend and represent the County at civil or criminal proceedings with no legal counsel present, while some defendants in these proceedings are represented by legal counsel.

### *Recommendations*

- 10. The Animal Care and Control Director should request training/guidance from the County Attorney's office for ACO's,*

*regarding proper preparation of documentation for court and civil hearings.*

11. *The Animal Care and Control Director should review equipment and communication needs at the San Manuel shelter.*
12. *The Animal Care and Control Director should evaluate the advantages of installing on-board computer equipment in all field trucks to allow ACO's to immediately, and more efficiently, input field investigation information.*

**E. Pre-rabies vaccinations for Animal Control Officers were not provided in a timely manner**

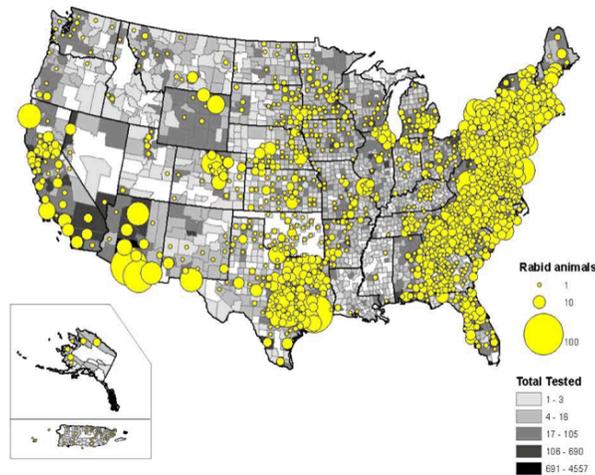
In the United States, rabies in humans is rare because most pets are vaccinated against the disease. Largely eliminated from dogs by vaccination programs, the virus has re-emerged as a widespread problem among wild mammals, particularly raccoons, skunks, foxes, coyotes, and bats. National Geographic News reported, in May 2009, a fast-evolving northern Arizona rabies strain had mutated to become contagious among skunks and foxes. The following table, prepared by the Arizona Department of Health Services, illustrates confirmed rabies cases in Arizona by year and species. Confirmed positive cases of rabies in 2009 were up 59.09% over 2008; and skunks were up 182.35%.

Table 1. Confirmed Positive Rabies Cases by Year and Species in Arizona

	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
<b>Bat</b>	65	55	56	44	75	84	96	115	89	69
<b>Skunk</b>	17	59	44	8	24	67	16	13	51	144
<b>Fox</b>	15	6	33	18	16	12	22	24	21	51
<b>Bobcat</b>	1	3	3	4	2	2	3	6	7	8
<b>Coyote</b>	1	4	2	1	2	1	1	1	4	2
<b>Horse</b>	0	0	0	0	0	0	0	0	1	3
<b>Cat/Dog</b>	1 dog	0	1 dog	0	0	2 cats	1 cat	0	1 dog	1 cat
<b>Other</b>	1badger	1badger	javelina 3 llama	0	0	1 raccoon	1 mountain lion	0	1 coati 1 mountain lion	1 Ringtail 1 cow
<b>Total</b>	101	128	143	75	119	169	140	159	176	280

The following map, prepared by the Center for Disease Control (CDC), shows Arizona has one of the highest rates of reported rabid animals in the United States.

### Rabid Animals Reported in the United States during 2009



12

Each year, about 40,000 people receive treatment for bites from potentially infected animals to prevent rabies and, according to the Arizona Department of Health and Safety (DHS), certain high-risk persons should be vaccinated against rabies. People who should consider being vaccinated include: veterinarians, persons who work with wildlife, laboratory staff who work with the rabies virus and long-term travelers to areas where rabies is common.<sup>13</sup>

Job descriptions for Pinal County Animal Control Officers include a requirement that ACO's receive pre-rabies vaccinations within nine (9) months of employment. Animal Control has never provided these vaccinations and has not monitored employees for compliance. In recent months, the Pinal County Office of Risk Management began working with Animal Control to provide general and department safety training, and offered budgetary support to ensure all Animal Control Field staff received pre-rabies vaccinations.

This same requirement is included in some kennel employee job descriptions; however, after a discussion with Risk Management, it has been determined kennel personnel are not subject to the same risk of exposure to wildlife as field personnel, and it may actually be a

<sup>12</sup> <http://www.cdc.gov/rabies/resources/publications/2009-surveillance/rabid-animals.html>

<sup>13</sup> <http://www.azdhs.gov/phs/oids/vector/pdf/manual06.pdf>

detriment for kennel personnel to receive the vaccine. This issue is currently under discussion by the Risk Management and Public Health Department Directors.

Internal Audit also reviewed websites for the Maricopa County Department of Public Health, the Pima County Animal Care Center, and the United States Center for Disease Control and Prevention, and found easily visible links for rabies and public health information. The Pinal County Animal Care and Control website and the Pinal County Health department do not have similar links.

### **Recommendations**

13. *The Animal Care and Control Director should work with the Risk Management and Public Health departments to determine criteria for providing pre-rabies vaccines and notify the Human Resources department to adjust job descriptions accordingly. A form should be developed and signed by each employee to document receipt or refusal of the vaccine.*
14. *The Animal Care and Control Director should work with the Pinal County Public Health Director to develop easily visible web-links for rabies information.*

### **Shelter/Kennel Operations**

To provide proper care for impounded dogs and cats, Animal Control maintains two shelters. The main shelter is located at 1150 South Eleven Mile Corner, Casa Grande, AZ, and a second shelter is located in San Manuel, AZ. The main Animal Control facility currently has eighty-five (85) canine kennels and fifty-four (54) feline cages.

In 2005, Animal Control borrowed \$1 million from the Pinal County General Fund to finance an expansion of the main facility and make improvements to the San Manuel facility. Also, in 2008, Animal Control borrowed another \$1.4 million to build sixty-six (66) additional kennels at the main facility.

The FY 2010/11 budget for Shelter Operations<sup>14</sup> is \$474,175 with an approved staff of four and one-half (4.5) full-time employees. The shelter also uses inmates to provide additional assistance.

During the course of this audit, the kennel was not operating at full staff levels, and kennel operations has experienced high staff turnover.

Internal Audit calculated minimum kennel staffing needs, using guidelines formulated by the National Animal Control Association. According to our calculations, presented in the table below, the Pinal County Animal Care and Control shelter is operating below recommended staff levels.

340,962 <sup>15</sup>	Multiplied by 7% <sup>16</sup> =	23,867 <sup>17</sup>
Human Population		Incoming Animal population per year (actual intake is 9,700)
9,700	Divided by 365 (Days per year)	26.57
Incoming Animals per year		Incoming Animals per Day
26.57	Times four day holding period (USHS <sup>18</sup> average)	106.30
Incoming Animals per day		Animal in Shelter per Day
106.30	Times fifteen <sup>19</sup> minutes per day	1,594.52
Animals in Shelter per day		Number of Minutes needed
1,594.52	Divided by 60 (minutes) =	26.57
Number of minutes needed		Number of hours needed
26.57	Divided by 3 <sup>20</sup> (hours needed for cleaning/feeding)	8.85
Number of Hours needed		Staff needed per day

The Arizona law governing County pounds is ARS §11-1013- *Establishment of county pounds; impounding and disposing of dogs and cats; reclaiming impounded dogs and cats; pound fees*. The statute states:

- A. The Board of Supervisors of each county “...may provide a county pound.”
- B. Any stray dog may be impounded. All dogs and cats impounded shall be given proper care and maintenance.

<sup>14</sup><http://www.pinalcountyz.gov/Departments/BudgetOffice/Documents/Downloads/FY%202010-2011%20ADOPTED%20BUDGET%2010.25.10.pdf>

<sup>15</sup> 2009 estimate U.S. Census Bureau

<sup>16</sup> NACA Estimated ratio of incoming pets to human population

<sup>17</sup> Actual impounded animals per year is approximately 10,000

<sup>18</sup> United State Humane Society

<sup>19</sup> Based on per-animal time of nine (9) minutes for cleaning and six (6) minutes for feeding

<sup>20</sup> These three (3) hours are solely for the performance of these cleaning and feeding but allow additional time for routine maintenance, laundry, dishes, lost and found checks, etc.

- C. Each stray dog and any cat impounded shall be kept and maintained at the county pound for a minimum of seventy-two (72) hours, or one hundred twenty (120) hours for any animal wearing a license, unless claimed or surrendered by its owner.
- D. Any impounded licensed dog or cat may be reclaimed by its owner, provided that person furnishes proof of the right to do so and pays all fees.
- E. If the dog or cat is not reclaimed within the impoundment period, the county enforcement agent shall take possession of, and may place, the dog or cat for sale or may dispose of the dog or cat in a humane manner. The county enforcement agent may destroy impounded sick or injured dogs or cats, if destruction is necessary to prevent the dog or cat from suffering or to prevent the spread of disease.

ARS 11-251 (62) also allows the County Board of Supervisor to enter into agreements to perform non-mandated services in county pounds. Non-mandated services include low cost spay and neuter services, public education and outreach efforts, pet adoption efforts, care for pets that are victims of cruelty or neglect, and support for volunteer programs.

To determine compliance with these statutes, Internal Audit interviewed staff, conducted tours of Pinal County Animal Care and Control facilities, and reviewed written policies and procedures. Internal Audit also compared operations in Pinal County with other shelters in Arizona and around the country.

**F. Euthanasia policies and procedures are not adequate to ensure services are performed correctly and safely for the animals or Animal Control Officers involved.**

Pinal County Animal Care and Control *MFR* FY2010/11 Strategic Business Plan reports 9,700<sup>21</sup> animals are impounded per year and estimates 7,500<sup>22</sup> (77.3%) are euthanized.

Internal Audit reviewed Animal Control's recently developed<sup>23</sup> euthanasia policy and determined the policy does not include guidance on training; does not require Animal

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<sup>21</sup> [http://www.pinalcountyz.gov/Departments/MFR/Documents/BusinessPlans/FY2010-2011/Animal%20Care\\_and\\_Control%20SBP\\_FY10\\_11\\_Final\\_02232010.pdf](http://www.pinalcountyz.gov/Departments/MFR/Documents/BusinessPlans/FY2010-2011/Animal%20Care_and_Control%20SBP_FY10_11_Final_02232010.pdf)

<sup>22</sup> [http://www.pinalcountyz.gov/Departments/MFR/Documents/BusinessPlans/FY2010-2011/Animal%20Care\\_and\\_Control%20SBP\\_FY10\\_11\\_Final\\_02232010.pdf](http://www.pinalcountyz.gov/Departments/MFR/Documents/BusinessPlans/FY2010-2011/Animal%20Care_and_Control%20SBP_FY10_11_Final_02232010.pdf)

Control management to maintain documentation of training provided; does not list staff requirements or level of experience needed to perform these services; and does not detail actual procedures.

Animal Control Policy 1.10 *Euthanasia Protocol and Procedure for Impounded Animals* is a two-page document that consists of the following ten (10) bulleted points:

1. Any staff member who has information as to a possible owner or adoption of an animal may request a hold on the animal.
2. The Kennel Supervisor is responsible to prepare the euthanasia list.
3. The euthanasia list is given to dispatch staff to clear animals (i.e. ensure euthanasia is appropriate) using information from activity, kennel, and lost reports.
4. First shift ACO's will perform euthanasia and disposal. All ACO's wear eye and hand protection. Kennel doors remained locked until euthanasia is complete. Only authorized personnel are allowed in the area. Euthanasia is not complete until all animals are disposed of properly and an announcement is made to open the kennels.
5. Animals listed for euthanasia sharing a kennel with animals not on the list must be separated prior to receiving any injections.
6. Animals will be euthanized using the chemicals and methods as instructed during training.
7. All animals are to be euthanized using a sedative first and then administering the fatal solution. A stethoscope will be used prior to disposal of all animals. All animals must be scanned for a microchip prior to being euthanized.
8. All ACO's will complete a Controlled Substance disposal log. ACO's will complete all information in the kennel record and remove the animals from the database.

9. Disposal logs, with impound cards, are turned into a Field Supervisor. Disposal logs will be completed before leaving the shelter.
10. The Field Supervisor will go over each disposal log and ensure all animals are removed from the database. Disposal logs are filed and maintained in accordance with federal and state regulations.

Internal Audit reviewed actual euthanasia practices at Pinal County Animal Care and Control and observed the following:

- Pinal County prepares a kennel card for all animals upon intake. Kennel cards list basic descriptive information about the animal including an animal number, an activity number, a picture of the animal and a kennel/pen number. Some kennel cards do not have an animal picture, or the picture is dark or out of focus.

Pinal County Animal Care & Control			
Kennel Card			
Kennel No: <b>RECEIVING</b>	Animal No: <b>A110164</b>	Activity No: <b>A10-005472</b>	Intake Cond: <b>NORMAL</b>
STATUS: <b>UNAVAIL</b>		Name: <b>UNKNOWN</b>	
		Color: <b>BROWN &amp; BLACK</b>	
		Breed: <b>AM PIT BULL TER \ MIX</b>	
		Sex: <b>FEMALE</b>	Age: <b>3 YR 0 MO</b>
		Collar Color:	Collar Type:
		Tag:	
		Markings:	
Intake Date: <b>11/8/2010</b>	Review Date: <b>11/12/2010</b>	Intake Type: <b>STRAY / FIELD</b>	Intake By: <b>70/KH</b>
Found @ / Comments: <b>W. PALM AVE.</b>			
Comments			

Many animals look similar or have common written descriptions on kennel cards (e.g. Pit Bull Red/Wht M 1Yr; Chi Tan F 2Yr; Germ Shep bwn/blk M 6 yr, etc.). On some kennel cards the kennel number is listed as RECEIVING, and kennel staff acknowledged dogs are regularly moved around in the kennels, and cards are not updated to reflect changing kennel numbers.

- Kennel cards are affixed to inside kennel gates. Generally, dogs are kept in inside kennels and moved to outside kennels when the kennels need cleaning. There is a door that slides up between inside and outside kennel areas to move dogs when kennels need cleaning; however, when the shelter is overcrowded dogs are kept in both inside and outside kennels at all



times. Kennel cards for dogs in outside kennels are still attached to inside gates.

- Euthanasia lists are prepared by the Kennel Supervisor. Lists are hand-written and include a kennel/pen, activity and animal number, and an animal description. Lists may have notations; for example, noting there is no picture for an animal on a kennel card, and information may be crossed off or blacked out. In interviews, ACO's stated the Kennel Supervisor may also add animals to the list while the ACO is performing euthanasia services. In Maricopa County, euthanasia lists are computer generated and reviewed by employees in several departments, before they are approved and euthanasia services initiated.
- On the euthanasia list, the pen number is the same as the kennel number. A pen number with the word 'In' or 'Out' next to it indicates the dog was in an inside or outside kennel when the list was prepared. If a list is prepared several

days before euthanasia services are performed, and animals and kennel cards have been moved, the list is not updated before euthanasia services are

Pen No	Activity No	Animal No	Animal Description	Clear Activity	Clear Shelter Log	Clear Loss Report	Cleared by Supervisor	Filed by Supervisor	Euthanased By
24	Shelter Pen	110154	Chinese Sharpei A Br/Bk 1/2	✓	✓	✓			
24	Shelter Pen	110155	Lab/Sharpei Br/Bk/White 1/2	✓	✓	✓			
24	Shelter Pen	110156	Lab/Sharpei Br/Bk/White 1/2	✓	✓	✓			
24	Shelter Pen	110157	Lab Gold M 3/4	✓	✓	✓			
24	Shelter Pen	110158	Lab Gold M 3/4	✓	✓	✓			
25	Shelter Pen	110136	D. + Bull A White/Brn F 2/3	✓	✓	✓			
25	Shelter Pen	110137	D. + Bull Br/Bk/White R 2/3	✓	✓	✓			
30	5606	110265	Dutchwood A Red W/Br	✓	✓	✓			16/16 adoption
31	5621	110228	German Shep/R. Gold F 1/4	✓	✓	✓			
35	5655	110235							
36	5620	110222	Chi White/Brn F 1/2	✓	✓	✓			
36	5620	110221	Chi Tan/Brn M 1/2	✓	✓	✓			
37	5559	110195	German Shep X Bull/Brn M 5/8						No picture
38	5571	110196	Gold Ret/Sharpei - German 1/2						No picture
40	Shelter Pen	110141	German Shep A Br/Bk M 1/2	✓	✓	✓			
41	5565	110194	Shiba Inu X Bull/Brn F 2/3						No picture
42	5472	110164	D. + Bull X Br/Bk F 2/3	✓	✓	✓			No picture
43	5667	110698	Chi Tan S 2/3	✓	✓	✓			
43	5544	110135	German Shep X Tan M 1/2	✓	✓	✓			
45	Shelter Pen	110160	D. + Bull X Red/Brn M 1/2	✓	✓	✓			
45	Shelter Pen	110159	D. + Bull A Red/Brn F 1/2	✓	✓	✓			
46	5557	110193	Shiba Inu X Bull/Brn F 2/3						No picture

performed. The Animal Control Director stated Animal Control Officers performing euthanasia are told not to rely on pen numbers on the euthanasia list.

- The euthanasia list includes activity and animal numbers for each dog and a basic description of the animal. Before euthanizing an animal, an ACO matches the information on the list to a kennel card with the same information. The matching kennel card is pulled out of a plastic sleeve on the kennel gate, rolled up, and placed in the metal kennel gate, thus ‘marking’ the kennel. Dogs in outside kennels, listed for euthanasia, do not have kennel cards on their outside gate. The kennel cards for these dogs are rolled and placed in the corresponding inside gate, leaving the outside kennels unmarked.
- Pinal County Animal Control euthanasia services are performed by assigned first shift Animal Control Officers three to four times a week, as needed. As discussed in the Rabies and Field Services section of this report, Internal Audit determined Animal Control ACO staff is operating significantly below approved staff levels. As a result, a very small number of Officers are required to euthanize approximately one hundred-fifty (150) animals every week.
- Internal Audit also verified Animal Control Management has directed probationary ACO’s to perform euthanasia procedures alone and without Supervision. This practice is not recommended by the National Animal Control Association (NACA). NACA guidelines state, “Euthanasia should be performed by a minimum of two persons and only by persons who are trained in humane euthanasia procedures, and can demonstrate their ability in accordance with methods put forth in training approved by the National Animal Control Association, the Humane Society of the United States, the American Humane Association, the American Society for the Prevention of Cruelty to Animals, The American Veterinary Medical Association, or an accredited educational institution.”<sup>24</sup>
- By comparison, Maricopa County has developed comprehensive written training policies and procedures for these services. Euthanasia is performed by veterinarians or veterinary technicians trained under the supervision of

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<sup>24</sup> <http://www.nacanet.org/guidelines.html#euthanasia>

veterinarians, using well developed, and documented, euthanasia training programs.

- Pinal County Animal Control Officers publicly admitted they have mistakenly sedated or euthanized animals not on a euthanasia list. Employees working in other animal control facilities have also admitted that, despite every effort to ensure mistakes are not made, occasionally the wrong animal has been euthanized in their facility. In Maricopa County, disposable collars that include animal and activity numbers are used to appropriately distinguish animals and help prevent these incidents.
- In Pinal County, Animal Control Officers are also responsible to separate animals scheduled to be euthanized from animals that are not scheduled to be euthanized, if these animals are sharing a kennel (Policy 1.10 #5). In Maricopa County, this activity is performed by kennel personnel under the supervision of the kennel manager.
- Pinal County Animal Control Officers are also responsible for moving all deceased animals from their kennels to the crematory. In Maricopa County, these services are performed by kennel personnel allowing ACO's more time in the field.

After discussing euthanasia procedures with ACO's, Internal Audit concluded that performing all of these procedures alone, or with very little assistance, is emotionally, mentally, and physically very challenging.

### **Recommendations**

- 15. The Animal Care and Control Director should consider securing a professional services contract for the performance of animal euthanasia.*
- 16. The Animal Care and Control Director should revise animal intake procedures, to include identifying each animal with a disposable ID*

*band/collar that displays the animal and activity numbers. Euthanasia procedures should include a requirement for comparing ID band/collar to the euthanasia list prior to euthanizing any animal.*

*17. The Animal Care and Control Director should review Euthanasia Policy 1.10 and revise the policy to follow the National Animal Control Association guidelines and other best practices including:*

- *ACO's should never perform, or be ordered to perform, euthanasia services alone, and management should require two person teams to perform all euthanasia procedures.*
- *Animal Control Management should document all training received by ACO's, before they perform these services, and require that ACO's still in probationary status perform these services only under direct Supervision.*
- *Animal Control euthanasia training should include instructions on standard pharmaceutical guidelines, including expected dosages to be administered (e.g. < 10lb (.5cc); 10-20lbs (1cc); etc.) to various types of animals.*
- *Euthanasia procedures should include a requirement for an ACO (or other staff member not performing euthanasia) to reconcile dosages on euthanasia lists to the amount of drugs dispensed.*
- *The Kennel Supervisor should perform a final review of the euthanasia list, animals, and kennel cards just prior to initiation of euthanasia. If appropriate, kennel cards of animals on the list should be changed to clearly reflect the current pen number. If there are significant changes to the list, as is sometimes the case with lists prepared on the Friday before Monday euthanasia*

*services, changes should be clearly documented, and ACO(s) performing the procedure should be provided a clean and final list prior to beginning euthanasia procedures.*

- *All animals euthanized must have a kennel card with a clear photo of the animal prior to euthanasia, including owner surrender. Owners surrendering animals to be euthanized should be asked to sign an immediate euthanasia release form.*
- *All animals not approved for euthanasia should be removed from kennels/pens holding the animals approved for euthanasia, prior to beginning euthanasia services. This procedure should be performed by kennel personnel under the supervision of the Kennel Manager.*
- *Euthanasia services should not be allowed in outside kennel areas. This defeats the purpose of closing the kennels down during these procedures.*
- *Mandated compassion-fatigue workshops should be provided for all staff at regular intervals, as recommended by the Humane Society of the United States.*
- *Require regular communication with other Animal Control operations to determine best practices.*

**Euthanasia Pharmaceuticals** - One of six (6) findings in a memo<sup>25</sup> from Pinal County Risk Management to the Animal Care and Control Director, following a premises safety evaluation performed by the Arizona Industrial Commission Division of Occupational Safety and Health (ADOSH), discussed vials of animal medication stored in staff

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<sup>25</sup> June 2, 2010

refrigerators. Risk Management recommended the medications be stored in refrigerators designated for this purpose, and Animal Control has complied with this recommendation.

Internal Audit reviewed all applicable policies and procedures regarding controls for pharmaceuticals used for euthanasia and found:

- Staff consistently complied with the internal drug administration policy and United States Drug Enforcement Administration (DEA) regulations.
- Animal Control obtained a DEA permit allowing employees to administer these pharmaceuticals.
- Animal Control developed Policy 1.09, requiring documentation of access to pharmaceuticals and limiting access to two employees.
- Policy 1.07 *Handling, reporting and Disposal of Controlled substances* requires ACO's to record the total number of animals euthanized on Daily Activity Logs, but states, "not the total amounts of controlled substances administered." ACO's document the amount of controlled substance administered during euthanasia on kennel cards and disposal logs. ACO's remove animal data from the computer system and turn in cards and logs to the Field Supervisor. The Field Supervisor is responsible to make sure animal data is removed from the computer.

### Recommendations

18. *ACO's should record the total of all amounts of controlled substances administered, and the Kennel Supervisor or Director should reconcile total dosages used to total dosages dispensed.*

**G. Kennel Management at the Animal Control main facility has not developed comprehensive policies and procedures for kennel functions.**

On June 29, 2010 the Pinal County Risk Manager received a report from the Industrial Commission of the Arizona Division of Occupational Safety and Health (ADOSH)

regarding an agreed upon Limited Health Service survey conducted at the main Animal Control facility at Eleven Mile Corner. The report noted several health hazards, which have subsequently been remediated, and commented, “The employer was lacking some important health program and employee training.” The report also recommended:

- A comprehensive written safety and health program containing workplace hazard specific policies and procedures.
- Communication of safety and health policies and procedures on signage throughout the facility.
- Monthly management and safety meetings.
- Documented general inspection of the entire facility.
- Comprehensive tracking of all workplace incidents with in-depth investigation and corrective action.
- Provision of necessary personal protective equipment (PPE) necessary for the work to be done.

Internal Audit concurs with these recommendations and asked the Kennel Supervisor at the main facility to provide the current policies and procedures for all kennel functions. The Kennel Supervisor provided Policy 1.15 *Maintenance of Buildings, Kennels and Grounds*. The 2-page policy consists of a number of directives; (e.g. Kennels will be treated monthly for parasite infestation, etc.) however, there are no procedural details about how to accomplish these directives.

Also, Internal Audit inquired about proper personal protective equipment (PPE) for kennel employees, to verify all employees have been provided the equipment recommended in the report. These protocols should be observed at both shelters. Kennel Management has responded to the ADOSH recommendation and now provides eye goggles and other equipment. Internal Audit also reviewed the current uniform policy and found kennel personnel are only provided \$250 per year for shirts and water boots, while front office staff are provided \$750 per year for pants, shirts, boots, belts, coats and utility belts.

## Recommendations

19. *The Kennel Supervisor should develop written policies and detailed procedures for all kennel functions including disease control, sanitation, euthanasia evaluation and assessment procedures, sickness and disease protocols, feeding and zoonoses<sup>26</sup> protocol.*
20. *The Animal Care and Control Director should review the current uniform policy and consider offering kennel technicians complete durable uniforms and work shoes. Washable coveralls should also be available for other personnel performing work in the kennels (euthanasia, etc.).*

### **H. Deferred maintenance at the San Manuel shelter creates a safety risk for citizens and Animal Control staff.**

The two officers stationed in San Manuel patrol the area of the County from approximately Kearny to county lines south and east. Work schedules, on-call and week-end duties are rotated between the two (2) ACO's. There is also one part-time staff person to help care for the animals at the San Manuel facility.

The facility is on a dirt road no longer maintained by the County, and it is impassable after a hard rain. Pinal County citizens are unable to visit the facility during these times to drop off or retrieve stray animals, or attend license clinics. The facility itself, although rudimentary, is fairly well maintained; however, there are no outside runs, and remains of euthanized animals are stored in a locked freezer until staff can take them to the landfill.

The land around the building is fenced and patrolled by a guard dog at night; however, it is not well maintained. An old Chevy S-10 pick-up has been left in the yard for an indeterminate amount of time, despite staff's reported calls to Pinal County Fleet for removal. Also according to staff, an overhead light needed to illuminate the yard at night has been burned out for an indeterminate amount of time and, despite repeated calls to Facilities, the light bulb has not been changed.

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<sup>26</sup> Zoonosis – infectious disease that can be transmitted from animals (wild and domestic) to humans



Computer access is not available at the site, and communication with the main office is accomplished only by telephone or employees traveling to the main office or County Complex for scheduled hearings.

Internal Audit reviewed dispatched calls for FY2009/2010 and found calls for the Kearny/Mammoth area averaged twelve (12) per month; however, the San Manuel operation encompasses approximately 1,000 square miles, and staff explained they are responding to increased suspected rabies calls (skunks, raccoons, bats, etc.) and wildlife incidents.

### Recommendations

*21. The Animal Care and Control Director and County Management should analyze the liability risks and cost of maintaining the San Manuel facility. If a determination is made to keep the facility, the building, grounds and public access road should be regularly maintained by Pinal County Facilities, Fleet and Public Works departments.*

### Administration and HR

**Prior Audit** - In 2007, the Pinal County Chief Financial Officer retained the services of an external auditor to determine if the former Animal Control Office Supervisor was involved in possible, “improprieties and mishandling of cash receipts...” The report stated the office receipts over \$500,000 a year and concluded, “the system of controls is not adequately working... there is a casual nature to the funds being received and flagrant violations as to the county policies.”

**I. Cash handling procedures have improved but are still not adequate to ensure proper controls are in place to prevent possible misappropriation of funds.**

Internal Audit reviewed current internal controls over cash handling. The office has developed a written policy, #1.04 *Petty Cash; ACO cash reports; deposits*. The policy covers multiple cash receipting functions but does not explain any transaction in detail. The four page document covers the following areas: petty cash funds, division cash receipt reports, mail receipts, office receipts and field receipts.

Separate operating procedures should be written for each of the above areas. Also, a more efficient and effective practice for numbering all policies and procedures (currently 1.01 through 1.18) would be to number each policy by the area of operation to which it applies. For example, Administration policies would start with a one (1) 1.0, 1.1; Field Services policies would start with a two (2) 2.0, 2.1, etc. This method of numbering helps to better organize policies and procedures, and makes them more easily identifiable for staff.

The office uses a computer application<sup>27</sup> that generates sequential receipts for all recorded transactions. Receipts are printed in duplicate, with one copy provided to a customer and one copy retained for records; however, there is no sign in the lobby reminding customers to ask for a receipt.

Computer application (Chameleon) reports are printed daily by office staff and used to prepare receipts for deposit. All cash receipts and cash receipts summaries are submitted to the Office Supervisor for final review and deposit. Employees do not receive a deposit slip for this fund transfer. The Office Supervisor makes regular (daily if needed) deposits to the Treasurer's Office of all cash receipts. No reconciliation of receipts to Treasurer's deposits is conducted.

All employees have received cash handling training provided by the Pinal County Finance Department. Mail is opened, and receipts are recorded and signed by two employees.

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<sup>27</sup> Chameleon

Animal Control Officers are required, when requested and appropriate, to return animals in their trucks to the rightful owners, when identified in the field, and collect cash or checks from these owners for field impounds.

### Recommendations

22. *The Animal Care and Control Director should develop detailed written procedures for all cash handling transactions, including computer instructions. Employees turning in cash receipts to the Office Supervisor should receive a deposit slip prepared by the Office Supervisor and signed by the employee. The Office Supervisor should assign staff, other than the individual preparing deposits for the Treasurer's office, to reconcile all receipts to Treasurer's deposits.*
23. *The Animal Care and Control Director should place a sign in the lobby, and at any remote locations accepting cash receipts, instructing customers to ask for a written receipt.*
24. *The Animal care and Control Director should immediately discontinue the practice of truck impound/release and cash collections in the field. ACO's should not conduct any transactions at their truck and, if necessary, trucks should have a sign stating ACO's will not collect cash for any reason.*

### **J. Animal Control Office staff is maintaining manual records that could easily be maintained electronically**

Internal Audit conducted a review of vehicle usage and staff over-time tracking and found staff over-time is manually recorded, and a duplicate record is prepared for payroll and maintained in a notebook binder by the Office Supervisor. These records could be recorded and stored electronically to more effectively use limited office space.

Recommendations

*25. The Animal Care and Control Office Supervisor should review office procedures and determine areas that could be managed more efficiently and effectively using technology, while also limiting use of office space.*

**K. Animal Control has not developed uniform policies for IGA contracts and billing formulas.**

Arizona allows cities and towns an exemption from the state laws that require animal control services (ARS § 11-1018), if the cities and towns “impose a license fee and vaccination on dogs by ordinance, provided such an ordinance is equal to or more stringent than...” the statute. ARS 11-1018 also allows counties an exemption if they “regulate the running of dogs in the unincorporated areas of the county by ordinance...”

Pinal County Animal Care and Control has signed Intergovernmental Agreements (IGA) to provide animal care and control services with five (5) cities and towns within the County. These cities and towns have either adopted their own ordinance or adopted Pinal County Animal Care and Control Ordinance 50510.

City or town	Collects license fee	Adopted Pinal County Ordinance 50510	IGA currently in effect Y/N	Provides own Animal Control equipment Y/N	Contracts for own Animal Control Officer Y/N
Coolidge	Y	Y	N	Y	Y
Florence	N	Y	Y	N	N
Kearny	N	Y	Y	N	N
Mammoth	Y	Y	Y	N	N
Maricopa	N	Y	Y	Y	Y

All IGA's include a clause stating the contract can be terminated with a thirty (30) day notice. The city of Coolidge has terminated their IGA with Pinal County, and the city of Maricopa has announced they will more than likely terminate their IGA soon, as well.

Animal Control bills these cities and towns based on:

- Before or after hours calls (\$42/\$63)
- Kennel fees for statutory three (3) days (unlicensed) or five (5) days (licensed)
- Quarantine (if needed)
- Actual mileage to and from the Eleven Mile Corner facility (for Coolidge, Florence and Maricopa) or San Manuel facility (for Kearny and Mammoth).

There is no charge to cities for euthanasia services or for animals kept longer than the statutory limit. In a document presented to the Board of Supervisors, Animal Control estimated euthanasia costs of \$33 per animal. Individual owners are charged \$50 for these services.

Contract billing provisions are not uniformly determined and do not:

- A. Calculate a different rate for cities that collect a license fee versus the cities that do not collect a license fee. In effect, an entity that collects a license fee decreases the license fee revenue base for Pinal County within that city and, therefore, should pay more for services based on a percentage of the overall fees collected.
- B. Account for coincidental proximity of the cities to the Animal Control facilities. All other Animal Control operations we contacted charge an impound fee per animal and did not charge for mileage to/from the facility.
- C. Calculate differentials for cities based on industrial use of equipment (crematory) or kennels.

Internal Audit also reviewed IGA billing records for the past two years and found:

- The majority of the billings we reviewed were accurate, with one exception. The August 6, 2009 billing for Mammoth should have been \$417.85 instead of \$516.70 (a difference of \$98.85). Mammoth was incorrectly charged the same fee as Kearny (Kearny was charged the correct fee of \$516.70).

### Recommendations

*26. The Animal Care and Control Director should develop a detailed policy for initiating IGA's. The policy should include criteria for uniform billing practices and consider whether:*

- *An entity does or does not collect a license fee.*
- *Distance from a county facility is an equitable billing criterion.*
- *Charging a set monthly fee (\$4200) for a city to "rent" a full-time animal control officer is an efficient use of resources, and if this practice is appropriately accounted for when determining human resource and scheduling needs for the operation.*
- *It is appropriate to waive fees for use of facility assets (crematory, kennels, kennel staff, etc.) by IGA participants, while charging individual Pinal County citizens a fee to infrequently use these services.*

*27. The Animal Care and Control Director should develop written policies and procedures for the IGA billing process.*

## Education and Adoption

### **L. Animal Control may not be collecting enough in early disposition class revenue to recoup actual costs**

On May 5, 2010, the Pinal County Board of Supervisors adopted County Ordinance 050510-ACC. The Ordinance applies only within the unincorporated areas of Pinal County and those municipalities that contract with the county for rabies and animal control services; otherwise, it does not apply to any incorporated city, town, or Native American reservation. The ordinance allows Pinal County Animal Care and Control enforcement agents to issue a citation for the following infractions:

- Violation of ARS §11-1001 through 11-1029; *Animal Control and Handling of Animals*
- Violation of ARS §13-2910 *Cruelty to Animals*
- Violation of ARS § 36-601 *Public Nuisance Dangerous to Public Health; Disposal and accumulation of manure or animal waste of domestic animals or pets*
- Excessive noise caused by animals or birds
- Diseased animals; keeping diseased animals prohibited; destruction authorized
- License for dogs; no more than four (4) licensed dogs on any single property unless a kennel permit is issued
- Dogs not permitted at large
- Vicious dogs
- Kennels; commercial, non-commercial, zoning ordinance, non-profit

Prior to the adoption of County Ordinance 050510-ACC, when a citation was issued the enforcement agent could elect to proceed in Justice Court or the Pinal County Hearing Office. Citizens issued a citation had the option to:

1. Enter a Plea of Liable and pay a \$100 fine for a first offense and a \$160 fine for all subsequent offenses.
2. Enter a Plea of Not Liable and request a hearing. A penalty or fine could be imposed of \$250 for a first offense and \$500 for subsequent offenses.

Court or Hearing proceedings are very time-consuming for Animal Control staff, and the final determination for all citations is uncertain. Judge or Hearing Officers' decisions are unpredictable, and the Hearing Office may have difficulty collecting a fine in a timely manner.

To minimize the number of complaints taken before a Justice of the Peace or the Hearing Office, the Director of Animal Care and Control was authorized by the new ordinance to "... establish an early disposition process for violations of Arizona law and Pinal County Ordinance 050510." If a citation or complaint was resolved by early disposition, the county enforcement agent was allowed to dismiss the citation or complaint and collect "...any fee, charge or penalty..." with proper notification to the Justice of the Peace or Hearing Office.

Animal Control has established a one-hour education course and allows citizens seven (7) days to contact Animal Care and Control, after a citation is issued, and schedule an early disposition class. Upon completion of the class the citation is dismissed.

Animal Control established a fee of forty (\$40) dollars for the course. When asked, the Field Supervisor in charge of early disposition classes could not provide documentation for determining the basis of the \$40 fee for the class.

### *Recommendations*

*28. The Animal Care and Control Director should ensure the fee charged for early disposition classes reflects the County's actual costs, which should account for all resources used to issue and process the citation, as well as provide the classes.*

**M. The link to the public website site for viewing adoptable animals is not clearly identified on the Pinal County Animal Care and Control website.**

Arizona Revised Statute § 11-1013 requires animals be held at least seventy-two (72) hours prior to being put up for adoption, sent to a rescue group, or euthanized. Pinal County Animal Control has developed a comprehensive Adoption policy and procedures (Policy 1.01) and employs an Adoption Coordinator; however, the position is currently vacant.

Animal Control staff regularly updates the animals lost, found and available for adoption on the public website, Pet Harbor;<sup>28</sup> however, the link to Pet Harbor on the Pinal County Animal Control website is located under Pet of the Week and is difficult to find from the front page of their website.

Shelter or City	Number of adoptions in 2009	Number of adoptions in 2010	Number of animals impounded in 2009	% of adopted to impound
Apache Junction	496	NA	2,503	19.82
Casa Grande	126	141	2,316	6.09
Eloy	5	NA	NA	NA
Maricopa County	NA	14,767	54,696	27.00
Pinal County	490 (2008)	1,200 <sup>29</sup> (approximately)	9,700	12.37
Valley Humane Society	24	NA	NA	NA

Costs to prepare an animal for adoption include veterinarian fees for spaying or neutering, daily kennel costs, and vaccination. In addition, all dogs are micro-chipped.<sup>30</sup> According to a document prepared by the Animal Control Director, “Animal Control’s Fee Schedule (March 2010),” the cost to impound a dog or cat is approximately \$18.00 per day, and the average number of days an animal is held in the shelter is 5 days. Internal Audit analyzed this document and fee schedule and found numerous inaccuracies, including errors in calculation.

<sup>28</sup> <http://www.petharbor.com/>

<sup>29</sup> Extrapolated from information provided for July/Aug/Sept 2010

<sup>30</sup> Identification chip implanted beneath the skin

Internal Audit visited the Maricopa County Animal Care and Control operation and reviewed their June 2010 annual report. Their report includes:

- Adoption information and statistics
- Shelter services information, including veterinary clinics that employ three fulltime veterinarians and have partnerships with local veterinary and veterinary technician schools
- Community Outreach, volunteer and event information
- Licensing information; mailing out materials for 579,000 dog licenses
- Call Center information; receiving 399,000 calls/year

### Recommendations

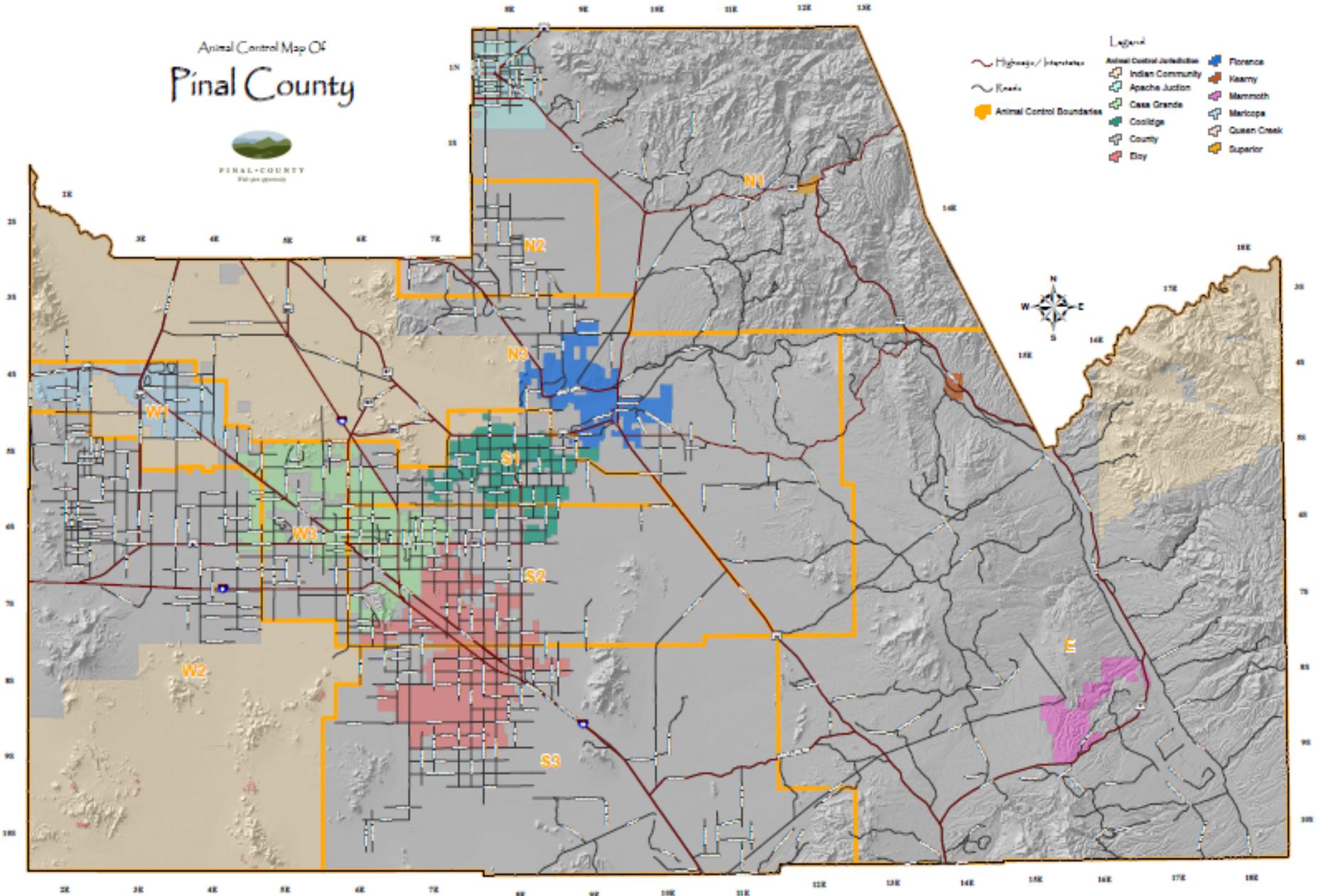
29. *The Animal Care and Control Director should place the link to Pet Harbor on the front page of the Animal Care and Control website. If possible, a link should be placed on the front page of the Pinal County website, as well.*
  
30. *The Animal Care and Control Director should consider developing and providing an annual report about the facility's activities to the Pinal County Board of Supervisors and interested citizens.*
  
31. *The Animal Care and Control Director should regularly visit with directors/managers of other Arizona animal shelters to learn about best practices that could be implemented in Pinal County. For example, Maricopa County uses a re-tooled recreational vehicle donated by the Maricopa County Library Commission to operate a mobile adoption unit, and has contracts with over sixty (60) rescue shelters to help prepare and place adoptable animals.*

**Attachments:**

**A. Animal Control dispatch area boundaries**

**B. Management Response and Action Plan**

# Animal Control Map Of Pinal County



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Arizona, State of 2010-2011, County of Pinal Animal Control District Map, by the Arizona Department of Agriculture, 2010-2011, County of Pinal

## APPENDIX A



Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p>1. <i>The Animal Care and Control Director should conduct a complete review of field service operations, focusing on improving working conditions for Animal Control Officers and increasing service hours out in the field. Areas of the review should include:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Determining the optimum level of staff needed to respond promptly to all priority service calls within each service area</i></li> <li>▪ <i>Determining the most efficient service area boundaries, utilizing a consistent formula for apportionment</i></li> <li>▪ <i>Determining the most effective method for managing after business hours calls, to include possibly hiring a second shift ACO to perform night and/or week-end calls in high-demand areas. This would allow ACO's in those areas to work full day schedules</i></li> <li>▪ <i>Determining the most effective parking locations for work vehicles, to eliminate wasted time and fuel commuting to service areas. This would most likely be a current County facility within each assigned service area</i></li> </ul>	Y	<p>We agree with the auditors' comments, and the following action will be taken to improve the situation.</p> <ul style="list-style-type: none"> <li>• A complete comprehensive staff study shall be completed to determine the optimum level of staff needed to respond promptly to all priority service calls within each service area.</li> <li>• A review of boundaries as compared to the boundaries established by the population base within each geographical area of Pinal County.</li> <li>• The comprehensive staff study will include information regarding the need to hire additional staff working a second shift to include week-ends.</li> <li>• The animal control officer hours were adjusted on Jan. 3, 2011 to 0700 hrs. – 1900 hrs. Does not include week-ends. As staff vacancies are filled and personnel trained the scheduled hours will be adjusted to include week – ends.</li> <li>• Allowing animal control officers to take home an assigned animal control vehicle, will allow the officers to respond to calls for service in a more timely and efficient manner. Take home vehicles would only be permitted for officers living in Pinal County.</li> </ul>	January 01, 2012	Director Dickson

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p>2. <i>The Animal Care and Control Director, and Field Supervisors, should develop a comprehensive program for ACO training that requires:</i></p> <ul style="list-style-type: none"> <li>▪ <i>All training must be completed, and documented, before the Officer is allowed to perform duties alone. This information should be maintained in an employee file.</i></li> <li>▪ <i>A Field Supervisor, or adequately trained designee, must accompany all Animal Control probationary officers on patrol for a designated period of time before they are released for solitary duty. A release for duty should be documented by the Supervisor and the ACO.</i></li> <li>▪ <i>The Director, and the Field Supervisor, per discretion allowed by Pinal County Merit Rule 11.2, should extend any ACO's probation beyond the current six (6) month period if needed, "to properly assess the employee's suitability for their new position." Animal Control Management was not aware of this provision.</i></li> <li>▪ <i>All continuing professional education should be fully documented by the Field Supervisor and the ACO.</i></li> </ul>	Y	<p>We agree with the auditors' comments, and the following action will be taken to improve the situation.</p> <ul style="list-style-type: none"> <li>• A best practice, structured field training program, specific to each position within the Animal Care &amp; Control division shall be implemented. The training program will be an eight week program for officer, a six week program for kennel technicians, and three week program for office and dispatch staff. The training will consist of three phases; the training will be reviewed by the officer in training, training officer, and director. A re-phase will be permitted with recommendation from field training officer. Standard evaluation guidelines will be used by the field training officers to evaluate the performance of officers in training on a weekly basis specific to the training received and documented for the week.</li> <li>• With the directors approval probation shall be extended to any employee who is below standards at the initial six month period after hire date.</li> <li>• A training policy will be implemented that will mandate that every animal control officer and kennel employee receive a minimum of 8 hours continuous training, and 8 hours of proficiency training within a single 12 month period. The training must be approved by the immediate supervisor prior to training; the training will be formal and documented in the employee's file for future reference.</li> </ul>	January 01, 2012	<p>Director Dickson</p> <p>All Supervisors</p>

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>3. The Animal Care and Control Director should review field supervisor duties and determine the most advantageous training structure. For example, one field supervisor could be assigned ACO administrative and operational training duties, while the other supervisor is assigned field staff training</i></p>	Y	<p>We agree with the auditors' comments, this Audit Recommendation and Management Response, action plan ties into Audit Recommendation / Management Response and action plan #2, Research and Training will be part of the review.</p>	January 01, 2012	<p>Director Dickson Field Supervisors</p>
<p><i>4. The Animal Care and Control Director should assign adequate and appropriate administrative support staff to the Field Services operations.</i></p>	Y	<p>We agree with the auditors' comments, and the following action will be taken to improve the situation. The dispatch division has been relieved of numerous office tasks, which allow them to better assist the field with administrative tasks associated with field duties, such as gathering information prior to officers responding to calls. This will result in more efficient service to the public.</p>	March 1, 2011	<p>Director Dickson Dispatch staff Office staff</p>

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p>5. <i>The Animal Care and Control Director, and Field Services Management, should ensure no officer is allowed to work in the field without complete and documented training and equipment. All issued equipment forms should be signed by the receiving ACO, acknowledging receipt of the equipment listed.</i></p>	Y	<p>We agree with the auditors' comments, and the following action will be taken to improve the situation.</p> <ul style="list-style-type: none"> <li>• No officer will be issued equipment prior to documented training and competency.</li> <li>• Field supervisors shall be responsible for vehicle and equipment inspections on a weekly basis. Appropriate action will be taken to rectify any problems. Vehicles and equipment will be placed out of service until repairs / replacement can be made. The director will be notified in writing if a vehicle or equipment is taken out of service with a plan of action.</li> <li>• Officers will sign for all issued equipment to knowledge receipt of equipment and responsibility for the maintenance of equipment.</li> </ul>	March 01, 2011	<p>Director Dickson</p> <p>Field supervisors</p> <p>Kennel Supervisor</p> <p>Office supervisor</p>
<p>6. <i>Field Services Supervisors should ensure no ACO's enter private property to retrieve a reported stray animal when the owner is not present without the written consent of the property owner, unless an animal is in eminent danger.</i></p>	Y	<p>We agree with the auditors' comments, and the following action will be taken to improve the situation.</p> <ul style="list-style-type: none"> <li>• Policy has been created as follows:</li> <li>• At no time will an employee or volunteer of Pinal County Animal Care &amp; Control enter private homes, buildings, structures, or enclosures for the purpose of picking up animals unless the property owner his/her authorized agent, or representative of local law enforcement is physically present at the time of entry and impound.</li> </ul>	February 01, 2011	<p>Director Dickson</p>

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
6. <i>(continued)</i>	Y	<ul style="list-style-type: none"> <li>• Oral agreements or notes left for field officer, giving permission to impound are not an acceptable method for granting permission.</li> <li>• Minors do not qualify as property owners or legal agent of the property.</li> <li>• This procedure does not pertain to investigations involving pursuit of dogs at large.</li> </ul>	February 01, 2011	Director Dickson
7. <i>The Animal Care and Control Director, and Field Supervisors, should regularly review the equipment issued to ACO's and determine if the equipment is adequate to maintain a safe working environment. The Humane Society of the United States provides recommended field services safety equipment guidelines.</i>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• Same recommendation/response as #5</li> <li>• A complete inventory will be taken of all equipment issued to officers.</li> <li>• A thorough review of the Humane Society of the United States recommended field service safety equipment will be considered.</li> </ul>	March 1, 2011	Director Dickson Field Supervisors Kennel Supervisor
8. <i>The Animal Care and Control Director should ensure all ACO's are provided a means of communicating with Field Supervisors during any and all field service duties.</i>	Y	<p>We agree with the auditors' comments, and the following action will be taken:</p> <ul style="list-style-type: none"> <li>• We will assess the current use of the radio system to determine if changes are needed to provide most efficient use.</li> <li>• Dispatchers will be schedule to work the same shifts as the officers.</li> <li>• On going training will be provided to ensure optimal use of communication systems in place.</li> </ul>	January 01, 2011	Director Dickson Dispatch Staff

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>9. The Animal Care and Control Director should consider relocating Dispatch personnel to the ACO/Field Services building, to allow them to provide support for Field Services personnel and work the same shift hours as field services personnel. This change in staffing would provide needed administrative support, facilitate communication between Field Supervisors and ACO's, and allow ACO's more time in the field.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• The dispatch operations office will be relocated in an office adjacent to the officers' squad room in the second impound building.</li> <li>• The dispatchers have been relieved of the following office functions: adoption call backs, working on Saturday to assist with lobby traffic, training records, vehicle maintenance records. These functions have been reassigned to the appropriate staff.</li> </ul>	March 1, 2011	Director Dickson
<p><i>10. The Animal Care and Control Director should request training/guidance from the County Attorney's office for ACO's, regarding proper preparation of documentation for court and civil hearings.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• A mandatory training for all field and kennel staff has been tentatively scheduled for the last week in January 2011.</li> <li>• The training will be conducted by the Pinal County Deputy Attorney Mischa Hepner.</li> </ul>	March 1, 2011	Director Dickson Field Supervisors Kennel Supervisors

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>11. The Animal Care and Control Director should review equipment and communication needs at the San Manuel shelter.</i></p>	<p>Y</p>	<p>We agree with the auditors' comments, and the following action will be taken to improve the situation.</p> <ul style="list-style-type: none"> <li>• Animal Care and Control currently has office space in the Pinal County Building just east of the Animal Care and Control kennel, located on American Avenue. This office is shared with Pinal County Sheriff's Office, Pinal County Probation and Motor Vehicle Division.</li> <li>• There is a phone and computer within the office for the Animal Care and Control Officer use.</li> <li>• A work order has been submitted to the county information technology division for equipment to grant computer access to the officers from the San Manuel Animal Care &amp; Control Office.</li> <li>• The ability to complete paperwork via the computer at the San Manuel shelter would be a more efficient use of time, and better service to the public.</li> </ul>	<p>January 01, 2011</p>	<p>Director Dickson</p>

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>12. The Animal Care and Control Director should evaluate the advantages of installing on-board computer equipment in all field trucks to allow ACO's to immediately, and more efficiently, input field investigation information.</i></p>	<p>Y</p>	<p>We agree with the auditors' comments and the following action will be taken to improve:</p> <ul style="list-style-type: none"> <li>• The Pinal County IT division has agreed to provide specifications and cost related to the purchase and installation of computers in Animal Control Officer vehicles. This would include 'air card' coasts and instant messaging capability to enhance communication in the field.</li> <li>• Research will be done to determine the cost and efficiency of computer notebooks that may link to the current computer software currently being used.</li> </ul>	<p>January 1, 2011</p>	<p>Director Dickson</p>

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>13. The Animal Care and Control Director should work with the Risk Management and Public Health departments to determine criteria for providing pre-rabies vaccines and notify the Human Resources department to adjust job descriptions accordingly. A form should be developed and signed by each employee to document receipt or refusal of the vaccine.</i></p>	<p>Y</p>	<p>We agree with the auditors' comments, and the following action will be taken to improve the situation.</p> <ul style="list-style-type: none"> <li>• Job description / announcement will include verbiage: successful applicant may be subject to rabies vaccine.</li> <li>• Only animal control officers in the mountain areas, southern Pinal County, have enough risk to warrant the risk of this vaccination. (Pinal County Public Health Director, Tom Schryer)</li> <li>• Recommendations from research done by Graham Briggs and approved by the state rabies control officer, who is a veterinarian, and researched by an MD to ensure that this is an appropriate recommendation.</li> <li>• Policy will be reviewed and revised as needed to ensure, animals in rabies quarantine at the Pinal County Animal Care &amp; Control, are not handled, touched, moved, or provoked in any manner while under quarantine.</li> <li>• During feeding and routine cleaning of kennel the "doggy door" to the outside of the kennel will be closed to prepare the side of the kennel the dog is not in.</li> <li>• Quarantine signs are currently placed on kennels with quarantine animals.</li> <li>• Animal Control Officers who have exposure to the Mountain areas, Western Pinal County, will have the vaccine made available to them.</li> <li>• Right of refusal, forms, will be required of officers working in areas of higher risk, who refuse the vaccine</li> </ul>	<p>March 01, 2011</p>	<p>Director Dickson</p>

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>14. The Animal Care and Control Director should work with the Pinal County Public Health Director to develop easily visible web-links for rabies information.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• A meeting will be scheduled during the month of February 2011 with Director Tom Schryer, Pinal County Health division, to develop easily visible web-links for rabies information.</li> </ul>	January. 01, 2012	Director Dickson
<p><i>15. The Animal Care and Control Director should consider securing a professional services contract for the performance of animal euthanasia.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation.</p> <ul style="list-style-type: none"> <li>• The Director of the Animal Care and Control will do the research in conjunction with the Pinal County Budget Office.</li> <li>• The purpose of the research would provide an assessment of fiscal ability to contract for this service.</li> <li>• The service would require a board certified veterinarian to contract with the Animal Care &amp; Control division to provide euthanasia technicians for three to four hours twice a week to perform the duties of euthanasia at the kennel located at 11 Mile Corner Rd. The kennel staff would prepare the euthanasia list, assist the euthanasia technician, and properly dispose of remains.</li> <li>• In an effort to reduce the burden to the Animal Care &amp; Control Officers, a full time adoption coordinator has been hired and instructed to locate and work with trusted, 501C, animal rescue groups, veterinarian schools, and other adoption outreach coordinators across the state in an effort to reduce the number of animals euthanized</li> </ul>	January. 01, 2012	Director Dickson

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>15. (Continued) The Animal Care and Control Director should consider securing a professional services contract for the performance of animal euthanasia.</i></p>		<ul style="list-style-type: none"> <li>• All animal control officers and kennel technicians shall be trained by an Arizona board certified licensed veterinarian.</li> <li>• A rotation list for officer assisted scheduled euthanasia will be completed on a bi-weekly basis, with supervision present at all times</li> </ul>	January. 01, 2012	Director Dickson
<p><i>16. The Animal Care and Control Director should consider animal intake procedures that include identifying each animal with a disposable ID band/collar with animal and activity numbers. Euthanasia procedures should include a requirement for comparing ID band/collar to euthanasia list prior to euthanizing any animal.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• Color-coded identification bands and permanent black markers have been issued to all field officers and kennel technicians.</li> <li>• Training was conducted with each field officer and kennel technician regarding proper way to mark and apply identification bands.</li> <li>• The animal identification band with clearly marked identification number must be clearly marked on the band by the impounding officer prior to animal being accepted at the kennel. Bands are only being used on dogs at this time.</li> <li>• Employees are not required to band an aggressive dog; however, a red band with identification must be submitted with paperwork to be used if an event and opportunity arise which allows application of a band.</li> </ul>	February 1, 2011	Director Dickson

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>17. The Animal Care and Control Director should review Euthanasia Policy 1.10 and revise to follow National Animal Control Association guidelines and other best practices including:</i></p> <ul style="list-style-type: none"> <li>▪ <i>ACO's should never perform, or be ordered to perform, euthanasia services alone and should require two person teams to perform all euthanasia procedures.</i></li> <li>▪ <i>Animal Control Management should document all training received by ACO's before they perform these services and require all ACO's in probationary status perform these services only under direct Supervision.</i></li> <li>▪ <i>Animal Control euthanasia training should include standard pharmaceutical guidelines including expected dosages administered. (e.g. Animal &lt; 10lb administer .5cc; Animal 10-20lbs administer 1cc; etc.)</i></li> </ul>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• The current euthanasia policy (07:05:07) EUTHANASIA PROTOCOL AND PROCEDURE FOR IMPOUNDED ANIMALS, has been reviewed by an Arizona board-certified veterinarian and shall be revised.</li> <li>• The revised policy will include specific procedural guidelines.</li> <li>• No animal care and control employee will be supplied with the drugs or paraphernalia prior to receiving training by an Arizona board-certified veterinarian.</li> <li>• Animal Control Officers and Kennel staff in training will only be permitted to conduct euthanasia in a controlled environment during phase three of their documented training.</li> <li>• Dosage, euthanasia instructions/training and pharmaceutical guidelines shall be distributed and posted in conspicuous employee only locations.</li> <li>• Current Animal Care and Control policy (07:15:07) DRUG ROOM POLICY AND PROCEDURES:DISPENSING CONTROLLED SUBSTANCES: DISPOSAL OF EMPTY CONTROLLED SUBSTANCE CONTAINERS AND MEDICAL WASTE will be reviewed and revised as needed.</li> <li>• The kennel supervisor shall prepare the euthanasia list using the chameleon software crystal report application.</li> </ul>	February 1, 2011	Director Dickson

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p>17. (continued)</p> <ul style="list-style-type: none"> <li>▪ <i>Euthanasia procedures should include a requirement for ACO (or a staff member not performing euthanasia) to reconcile dosages on euthanasia lists to the amount of drugs dispensed.</i></li> <li>▪ <i>The Kennel Supervisor should perform a final review of the euthanasia list, animals, and kennel cards, just prior to initiation of euthanasia. If appropriate, any kennel cards of animals on the list should be changed and clearly reflect the current pen number. If there are significant changes to the list, as is sometimes the case with lists prepared on the Friday before Monday euthanasia services, changes should be clearly documented and ACO(s) performing the procedure should be provided a clean and final list prior to beginning euthanasia procedures.</i></li> <li>▪ <i>All animals euthanized must have a kennel card with a clear photo of the animal prior to euthanasia, including owner surrender. Owners surrendering animals to be euthanized should be asked to sign an immediate euthanasia release form.</i></li> </ul>	Y	<ul style="list-style-type: none"> <li>• The kennel supervisor shall submit the initial list to the dispatch division, who shall list all applicable notes, comments, or information related to each animal on the list.</li> <li>• The dispatch list shall be sent to the director for final approval. Once the list has been approved by the director, the list will be forwarded to the kennel supervisor in 'PDF' format one day prior to euthanasia. The list approved by the director will only include animals that have been approved for euthanasia.</li> <li>• All animals in the kennel must have a kennel card with a clear photo at all times. No animal is to be euthanized without accurate identification on the day of scheduled euthanasia.</li> <li>• Owners surrendering animals to the shelter are required to sign a Pinal County Care and Control Owner Animal Release.</li> <li>• On the day of scheduled euthanasia each dog must have a personal identification band that matches the identification number on the euthanasia list and kennel card. A clear photo and description to include sex of dog must match the actual dog prior to euthanasia.</li> <li>• All cats must have a kennel card with an identification number, clear picture, and description to include sex, which matches the actual cat in the kennel.</li> </ul>	February 1, 2011	Director Dickson

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p>17. (continued)</p> <ul style="list-style-type: none"> <li>▪ <i>All animals not approved for euthanasia should be removed from kennels holding animals approved for euthanasia prior to beginning euthanasia procedures. This procedure should be performed by kennel personnel under the supervision of the Kennel Manager.</i></li> <li>▪ <i>Euthanasia services should not be allowed in outside kennel areas. This defeats the purpose of closing the kennels down during these procedures</i></li> <li>▪ <i>Mandated compassion-fatigue workshops should be provided for all staff at regular intervals, as recommended by the Humane Society of the United States.</i></li> <li>▪ <i>Require regular communication with other Animal Control operations to determine best practices.</i></li> </ul>	Y	<ul style="list-style-type: none"> <li>• If any step of the identification process is missing or inaccurate, the animal shall not be euthanized. Once corrections are made the animal may be screened for euthanasia on a new list to be completed at a future date.</li> <li>• All animals approved for euthanasia shall be isolated in a kennel the evening prior to scheduled euthanasia.</li> <li>• The kennel supervisor shall be responsible for ensuring no more than one animal scheduled for euthanasia is assigned to a kennel. This kennel must be marked by placing a red card to the inside door of the kennel. The red card will indicate the animal can not be moved and no other animals can be added to the kennel until such time euthanasia has been completed, to include paperwork and cleaning of the kennel.</li> <li>• Euthanasia will only be conducted within the inside kennel; outside access will be prohibited for animals scheduled for euthanasia.</li> </ul>	February 1, 2011	Director Dickson

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>18. ACO's should record the total of all amounts of controlled substances administered and the Kennel Supervisor or Director should reconcile total dosages used to total dosages dispensed.</i></p>	<p>Y</p>	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• The Animal Care &amp; Control Director will review and revise current policy to ensure proper reconciling of all controlled substances.</li> <li>• The current policy to be reviewed and revised as necessary; (07:15:07) DRUG ROOM POLICY AND PROCEDURES; DISPENSING CONTROLLED SUBSTANCES; DISPOSAL OF EMPTY CONTROLLED SUBSTANCE CONTAINERS AND MEDICAL WASTE; (07:16:07) HANDLING, REPORTING, DISPOSAL OF CONTROLLED SUBSTANCES.</li> </ul>	<p>February 1, 2011</p>	<p>Director Dickson</p>

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>19. The Kennel Supervisor should develop written policies and detailed procedures for all kennel functions including disease control, sanitation, euthanasia evaluation and assessment procedures, sick and disease protocols, feeding, and zoonoses protocol.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• The current written policy to be reviewed and revised as necessary;</li> <li>• (07:05:07) EUTHANASIA PROTOCOL AND PROCEDURE FOR IMPOUNDING ANIMALS;</li> <li>• (07:14:07) MAINTENANCE OF BUILDINGS, KENNELS, AND GROUNDS;</li> <li>• (07:13:07) MAINTENANCE AND CARE OF IMPOUNDED ANIMALS.</li> <li>• Zoonoses protocol will be established.</li> <li>• Continuous written revisions to the policies and procedures will be made as needed to ensure the policy is current at all times.</li> <li>• The staff will be notified via email of all revisions; all policies and revisions will be posted on the shared drive of the Animal Care and Control computer system for all employees to access as needed.</li> </ul>	July 1, 2011	Director Dickson Kennel Supervisors
<p><i>20. The Animal Care and Control Director should review the current uniform policy and consider offering kennel technicians complete durable uniforms and work shoes. Washable coveralls should also be available for other personnel performing work in the kennels (euthanasia, etc.).</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• Research will be conducted to ensure the most adequate, durable, and cost effective uniforms are supplied to shelter staff.</li> </ul>	July 1, 2011	Director Dickson Field Supervisors Kennel Supervisors Office Supervisors

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>21. The Animal Care and Control Director and County Management should analyze the liability risks and costs of maintaining the San Manuel facility. If a determination is made to keep the facility; the building, grounds and public access road should be regularly maintained by Pinal County Facilities, Fleet, and Public Works departments.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• A comprehensive study will be conducted of the facility and staffing needs.</li> <li>• While the office is open to the public, arrangements will be made to maintain the road/driveway to and from the facility.</li> </ul>	March 1, 2011	Director Dickson
<p><i>22. The Animal Care and Control Director should develop detailed written procedures for all cash handling transactions including computer instructions. Employees turning in cash receipts to the Office Supervisor should receive a deposit slip prepared by the Office Supervisor and signed by the employee. The Office Supervisor should assign staff, other than the individual preparing deposits for the Treasurer's office, to reconcile all receipts to the Treasurer's deposits.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• The current written policy to be reviewed and revised as necessary;</li> <li>• (07:17:07) PETTY CASH; ACO CASH REPORT; DEPOSITS</li> <li>• Complying with the requirements of the Uniform Accounting Manual for Arizona Counties;</li> <li>• Stipulating the procedures to be followed in establishing and obtaining authorization for a petty cash fund;</li> <li>• Safeguarding and preserving county assets.</li> </ul>	January 1, 2012	Director Dickson Office Supervisor
<p><i>23. The Animal Care and Control Director should place a sign in the lobby, and at any remote locations accepting cash receipts, instructing customers to ask for a written receipt.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• Signs have been posted on the lobby service windows and are currently in place.</li> </ul>	January 01, 2011	Director Dickson

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>24. The Animal Care and Control Director should immediately discontinue the practice of truck impounds/release and cash collections in the field. ACO's should not conduct any transactions at their truck and, if necessary, trucks should have a sign stating ACO's will not collect cash for any reason.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• No monies will be collected in the field.</li> <li>• Signs shall be posted on all service trucks that cash is not carried in the vehicle. Signs have been ordered.</li> <li>• Policy regarding catch and release to owner in the field has been created,</li> <li>• Officers may release animal on truck to owner and issue a citation and/or warning if deemed necessary. (in place)</li> </ul>	February 1, 2011	Director Dickson
<p><i>25. The Animal Care and Control Office Supervisor should review office procedures and determine areas that could be managed more efficiently and effectively using technology, while also limiting use of office space.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• Schedule meeting with each employee to determine scope of duties, responsibilities, and proficiency using standard office technology such as computer program Microsoft Office.</li> <li>• Schedule training for staff in areas needed in an effort to reduce duplicate work and streamline workloads.</li> </ul>	January 1, 2011	Director Dickson

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p>26. <i>The Animal Care and Control Director should develop a detailed policy for initiating IGA's. The policy should include criteria for uniform billing practices and consider whether:</i></p> <ul style="list-style-type: none"> <li>• <i>An entity does or does not collect a license fee</i></li> <li>• <i>Distance from a county facility is an equitable billing criterion.</i></li> <li>• <i>Charging a set monthly fee (\$4200) for a city to "rent" a full-time animal control officer is an efficient use of resources and if this practice is appropriately accounted for when determining human resource and scheduling needs for the operation.</i></li> <li>▪ <i>It is appropriate to waive fees for use of facility assets (crematory, kennels, kennel staff, etc.) by IGA participants while charging individual Pinal County citizens a fee to infrequently use these services.</i></li> </ul>	N	<p>We do not agree with the auditors' comments;</p> <ul style="list-style-type: none"> <li>• All Intergovernmental agreements are reviewed and approved by the County Attorney's Office.</li> <li>• Any intergovernmental agreement will be reviewed and modified as needed; using a cost methodology for rate structure and other costs, providing a thirty day written request from the contracted city is submitted to the director of Animal Care &amp; Control, at any time during the contract.</li> <li>• Officers have been issued take home vehicles, providing the officer resides within Pinal County.</li> <li>• Distance from a county facility or an officer's residence may not be equitable for billing criterion. Cities providing vehicle for both city and county (on call) use shall not be charged for mileage.</li> <li>• A crematory charge at an, industrial use rate, will be considered for intergovernmental agreements with Cities within Pinal County.</li> <li>• Home quarantine is permitted in some cases, involving non-serious bites involving owner of animal, providing owner of the animal has all valid rabies vaccine and animal license on site for the animal control officer to review</li> </ul>	January, 01, 2011	Director Dickson
<p>27. <i>The Animal Care and Control Director should develop written policies and procedures for the IGA billing process.</i></p>	Y	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• Formal training and written policy and procedures will be implemented regarding all intergovernmental agreements.</li> </ul>	July 1, 2011	Director Dickson Office Manager

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>28. The Animal Care and Control Director should ensure the fee charged for early disposition classes reflects the County's actual costs, which should account for all resources used to issue and process the citation, as well as provide the classes.</i></p>	Y	<p>We agree with the auditors' comment and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• The fees currently charged were approved by the Pinal County Attorney's office and approved by the Board of Supervisors.</li> <li>• A review of the early disposition fee schedule will be reviewed.</li> </ul> <p>Auditor's note – The Board of Supervisors approves fees based on management recommendation and relies on management to conduct a thorough and accurate analysis of actual costs.</p>	January 1, 2012	Director Dickson
<p><i>29. The Animal Care and Control Director should place the link to Pet Harbor on the front page of the Animal Care and Control website. If possible a link should be placed on the front page of the Pinal County website, as well.</i></p>	Y	<p>We agree with the auditors' comment and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• A link to PetHarbor has been placed on the home page of the animal care and control web page and is currently in place.</li> </ul>	Jan. 01, 2011	Director Dickson
<p><i>30. The Animal Care and Control Director should consider developing and providing an annual report about the facility's activities to the Pinal County Board of Supervisors and interested citizens.</i></p>	Y	<p>We agree with the auditors' comments, and the following action will be taken to improve the situation.</p> <ul style="list-style-type: none"> <li>• Adding information to the Managing For Results, "MFR", as deemed appropriate.</li> <li>• "MFR" currently in place</li> <li>• Develop an annual report to release to the public which will include adoption success rate, spay and neuter success rate, license clinic locations and success rate. As well as other Animal Care &amp; Control involvement in community outreach events.</li> </ul>	January 01, 2012	Director Dickson Office Supervisor

Audit Recommendation	Concur Y/N	Management's Response and Action Plan	Target Date	Individual(s) Responsible
<p><i>31. The Animal Care and Control Director should regularly visit with other Arizona shelter employees and determine best practices that could be implemented in Pinal County. For example, Maricopa County uses a re-tooled recreational vehicle donated by the Maricopa County Library Commission to operate a mobile adoption unit and has contracts with over sixty (60) rescue shelters to help prepare and place for adoptable animals.</i></p>	<p>Y</p>	<p>We agree with the auditors' comments and the following action will be taken to improve the situation:</p> <ul style="list-style-type: none"> <li>• Continuous networking, site visits, and research various animal care and control agencies throughout the entire state.</li> </ul>	<p>Feb. 01, 2011</p>	<p>Director Dickson Field Supervisor Kennel Supervisor Office Supervisor</p>