

Special Review of Animal Care & Adoption Division Performance Records and Reporting

Office of the County Auditor

Audit Report

Robert Melton, CPA, CIA, CFE, CIG County Auditor

Audit Conducted by:

Gerard Boucaud, CISA, Audit Manager Luis Martinez, CISA, IT Audit Supervisor

> Report No. 18-17 March 20, 2018



OFFICE OF THE COUNTY AUDITOR

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March 20, 2018

Honorable Mayor and Board of County Commissioners

At the request of management, we conducted a Special Review of the Animal Care and Adoption Division Performance Records and Reporting.

The objectives of our review were to determine whether reported animal dispositions are accurate, to determine whether performance measure numbers are accurate, and to determine whether weaknesses in internal controls exist that may allow improprieties to occur.

Our audit was neither designed nor intended to be a detailed study of every relevant system, procedure or transaction. Accordingly, the areas of improvement presented in this report are not all inclusive.

We conclude that animal dispositions are not accurate, performance measure numbers are not accurate, and weaknesses in internal controls exist that may allow improprieties to occur. Opportunities for improvement are included in the report.

We appreciate the cooperation and assistance provided by the staff of the Animal Care and Adoption Division throughout our review process. Our exit conference was held with management on January 8, 2018, in which the draft report was discussed, and responses were solicited. Responses were received on March 8, 2018.

Respectfully submitted,

Bob Melton

County Auditor

cc: Bertha Henry, County Administrator

Andrew Meyers, County Attorney

Henry Sniezek, Director of Environmental Protection and Growth Management

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EXECUTIVE SUMMARY

At the request of management, we conducted a Special Review of the Animal Care and Adoption Division Performance Records and Reporting. Our objectives were to determine whether reported animal dispositions are accurate, to determine whether performance measure numbers are accurate, and to determine whether weaknesses in internal controls exist that may allow improprieties to occur.

We conclude that reported animal dispositions are not consistently accurate; performance measure numbers are not accurate; and weaknesses in internal controls exist that may allow improprieties to occur.

Unsupported changes to euthanasia records were made by the former Director. Out of 302 recorded euthanasia that were changed to "owner requested" euthanasia between October°1,°2015 and August 1, 2017, the former Director of ACAD (Director) performed 218 (72%). Euthanasia records that are categorized as owner requested do not negatively impact the live release rate (LRR). The inappropriate categorization leads to the overall overstatement of the LRR. Of the 218 changes, 87 (40%) changes were made within days prior to the reporting of performance measures by the Director. We reviewed in detail a sample of owner requested euthanasia changes performed by the Director and noted, 16 of 30 (53%) did not have appropriate supporting evidence to justify the changes from euthanasia (which affects live release statistics) to owner requested euthanasia. Since the Director is no longer employed by the County, we have no further recommendation regarding disciplinary action regarding the Director. We found no verifiable evidence that other employees were involved in inappropriate changes to the recorded euthanasia.

Some animals were euthanized without adequate supporting documentation. Thirty-two of 96 (33%) kennel records reviewed and labeled as owner requested euthanasia were inappropriately categorized in the computer system. For 26 of the 32 (81%) records identified, the animal surrender forms did not contain evidence that the owner requested euthanasia. We also noted that animal intake information in their system did not consistently match the information submitted by owners on the animal surrender forms or were incomplete.

We also noted opportunities for improvement relating to segregation of duties and other internal controls. Our report contains a total of 12 recommendations for improvement.

INTRODUCTION

Scope and Methodology

The County Auditor's Office conducts audits of Broward County's entities, programs, activities, and contractors to provide the Board of County Commissioners, Broward County's residents, County management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

At the request of management, we conducted a Special Review of the Animal Care and Adoption Division Performance Records and Reporting. Our objectives were to determine whether reported animal dispositions are accurate, to determine whether performance measure numbers are accurate, and to determine whether weaknesses in internal controls exist that may allow improprieties to occur.

To determine whether reported animal dispositions are accurate, we reviewed records in the kennel management software, performed validation procedures against supporting documentation, and conducted data analysis procedures to identify and investigate unusual trends in animal dispositions.

To determine whether performance measure numbers are accurate, we reviewed kennel intake and outcome reporting categories and business rules, traced outcome measures to kennel records and supporting documentation, and performed data analysis procedures on euthanasia rates.

To determine whether weaknesses in internal controls exist that may allow improprieties to occur, we reviewed policies and procedures, interviewed staff, reviewed the configuration of the kennel management software, and evaluated data validation controls.

Our review is limited to the specific objectives described herein and is not intended to be a comprehensive review of operations.

Our review included such tests of records and other auditing procedures, as we considered necessary in the circumstances. The audit period was October 1, 2015 through September 30, 2017. However, transactions, processes, and situations reviewed were not limited by the audit period.

Overall Conclusion

We conclude that reported animal dispositions are not consistently accurate; performance measure numbers are not accurate; and weaknesses in internal controls exist that may allow improprieties to occur. Opportunities for improvement are included in the report.

Background

The Animal Care and Adoption Division (ACAD) is responsible for the administration of the County's animal care and adoption functions as well as enforcement of ordinances outlined in Chapter 4 of the Broward County Code and laws described in Florida Statutes pertaining to dogs and cats.

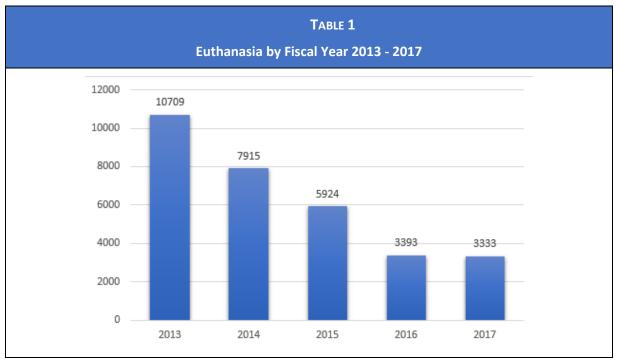
The Division consists of eight sections:

- 1. <u>Field Services</u> responds to all requests for assistance regarding stray, sick, injured, and vicious animals, and enforces provisions of Broward County Code, Chapter 4;
- 2. <u>Admitting</u> provides initial shelter intake services for field impounds, animals brought in from other municipalities as well as stray and owner surrendered cats and dogs brought to the facility. Admitting attempts, through established protocols, to divert intake by aligning citizens with needed resources;
- Sheltering maintains the animal shelter by providing food and other provisions as well as
 daily cleaning of confinement areas for impounded animals. This section also provides
 adoption support for citizens;
- 4. <u>Clinic Services</u> provides routine examinations, tests, immunizations, and treatments for impounded animals. The Clinic's veterinary staff sterilizes and provides emergency treatment, if necessary, for impounded animals;
- 5. <u>Public Education and Outreach</u> is coordinated by staff involved with public information and marketing. This section provides adoption marketing, plans special events and humane education programs, and generally informs the public about Division services, alerts, events, activities, programs, ordinance enforcement, and volunteer opportunities. They also host a monthly low-cost rabies vaccination and license clinic.
- 6. <u>Licensing</u> is responsible for the management, data entry and distribution of rabies licenses for the entire county.
- 7. <u>Customer Service</u> provides public point-of-contact for various services and programs sponsored by the agency.
- 8. <u>Administration</u> provides leadership, administrative oversight, planning, organizing and directing activities of the Division.

No Kill Community Goal

In 2012, resolution no. 2012-271 was adopted, establishing a program for Broward County (County) with the goal to become a "No Kill" community. A "No Kill" community sets objectives to ensure that adoptable animals (healthy or treatable) are not euthanized even when the shelter is full. Based on the resolution, ACAD developed the Financially Feasible Strategic Plan to establish measurable objectives strategically aligning business processes with the Board of County Commissioners' intent to become a "No Kill" community.

In support of the "No Kill" goal, an ordinance was approved by the Board of County Commissioners in September 2014, granting the Director of ACAD the ability to revise ongoing programs to decrease shelter intake and increase live animal outcomes. As a result, from fiscal years 2013 to 2017, various programs implemented by ACAD decreased euthanasia in the shelter. Table 1 shows the number of euthanasia for fiscal years 2013 through 2017.



Source: Compiled by County Auditor from data provided by ACAD.

Animal Intake Procedures

As animals are brought into the shelter by owners or individuals who find lost or stray animals, ACAD intake staff provides a consultation where they indicate that there is no guarantee that the animal will not be euthanized if the animal is left in the shelter. Owners surrendering animals to the shelter are required to complete an animal surrender form; however, there are cases where an owner may leave an animal at the facility without completing the appropriate documentation. In these cases, staff has the ability to add comments or create memos to provide additional details within the case management system.

The animal surrender form will not always include an animal's outcome or disposition. This is appropriate in cases where the owner is not requesting euthanasia and the animal will be evaluated for an alternative outcome. When an owner is requesting euthanasia, they are required to indicate this request on the form along with their signature or initials.

ACAD uses the information provided on the form to create a kennel record in the case management system that stores each animal's details and its disposition. The intake procedure requires staff to scan the animal surrender documentation directly into the case management system; however, management has identified that the scanning quality is too low for business

use. As a result, ACAD has implemented a secondary scan to a shared drive with higher quality to allow supervisors and managers to perform quality control checks.

Performance Measures:

Many of ACAD's core performance measures align with the "No Kill" goal. Specifically, a metric called the "live release rate" (LRR) is used to assess the shelter's performance by gauging the percentage of live animal outcomes against other outcomes. For example, animal adoption, animal reclaim by owner, and animal returned to field represent live outcomes, while a missing animal, animal death while in kennel custody or a euthanized animal do not. ACAD calculates the LRR by using guidelines called the Asilomar Accords that are widely considered standards throughout the industry. Using these guidelines, live outcomes are divided by the total outcomes to determine the LRR. Table 2 shows the live release formula used by ACAD, and Table 3 shows the live release statistics for fiscal year 2017.

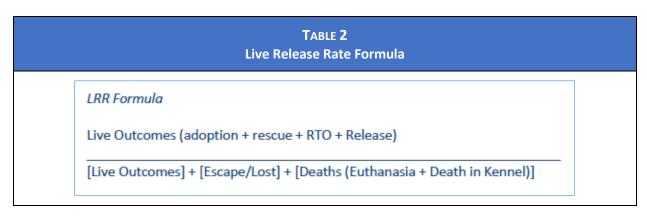


	TABLE 3 Live Release Statistics for FY 2017	
Live Release	Released	1,463
Outcome	Reclaimed by Owner	824
	Adoption	4,865
	Return-to-Field	1,433
	Grand Total Live Release	8,585
Other Outcome	Euthanasia	2,270
	Lost/Missing/Unaccounted For	5
	Death in Kennel/Custody	69
	Grand Total Outcome	10,929
	*Euthanasia (Owner Req.)	
Grand To	tal Live Release Rate (%)	78.55%

Source: Broward County Animal Management Database - Report Run Date 10/23/2017 2:00:31 PM *Euthanasia (Owner Req.) is provided for informational purposes only. It's not included in calculation.

Information Systems:

ACAD uses a shelter case management system called Chameleon to assist in managing shelter activities such as licensing, field operations, cashiering, veterinary record-keeping and shelter management. Accordingly, the general information systems controls, which are the policies and procedures that apply to the operations of the system, help to promote integrity, confidentiality, and availability of the operational transactions and data.

Animal intake and outcome records are maintained within the Chameleon system. The data maintained by this system is used to generate reports for the calculation of operational and performance measures.

Chameleon maintains the history of changes to kennel records. As of October 5, 2017, there were 2.6 million changes. Many of these changes are the result of authorized updates and saving of records.

OPPORTUNITIES FOR IMPROVEMENT

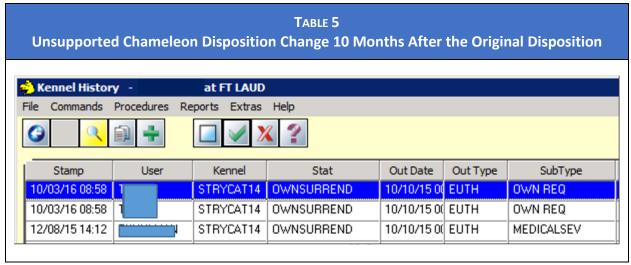
1. Unsupported Changes to Euthanasia Records Were Made by the Former Director.

Out of 302 recorded euthanasia that were changed to owner requested euthanasia between October 1, 2015 and August 1, 2017, the former Director of ACAD (Director) performed 218 (72%). Euthanasia records that are categorized as "owner requested" do not negatively impact the live release rate (LRR). The inappropriate categorization leads to the overall overstatement of the LRR. Of the 218 changes, 87 (40%) changes were made within days prior to the reporting of performance measures by the Director. We noted the reports used to capture performance measures were run on October 3, 2016, with the final change to "owner requested" made at 9:42am on the same day that the report was generated. The final reporting period of the fiscal year closes at the end of September. The results of the first run of the reports used to generate the year end performance measures were saved at 11:47am on October 3, 2016. Table 4 shows a representative sample of the changes made by the Director.

	Table 4						
Changes made by the Director Prior to Performance Measure Reporting							
1. The outcome disposition details made by the Director.				s made by the			nimal outcome disposition the Director's changes.
3. The date the previous outcome disposition details in block 2 were entered in Chameleon.				•		•	e and time the Director made come disposition changes in
1 2 Changed Outcome Subrupe Subrupe Outcome Type 2 Changed Outcome Subrupe Outcome Out			2 Soutcome Types Outcom	Subt	Ape Original Outcome	State 3 4	
EUTH	OWN REQ		EUTH	UNHEALTHY		9/13/2016	9/30/16 2:16 PM
EUTH	OWN REQ		EUTH	FELV		8/12/2016	9/30/16 2:18 PM
EUTH	OWN REQ		EUTH	FIP		8/25/2016	9/30/16 2:18 PM
EUTH	OWN REQ		EUTH	MEDICALSEV		8/16/2016	9/30/16 2:26 PM
EUTH	OWN REQ		EUTH	MEDICALSEV		8/23/2016	9/30/16 2:27 PM
EUTH	OWN REQ		EUTH	BEHAVIOR		11/7/2015	10/3/16 8:48 AM
EUTH	OWN REQ		EUTH	INJURED		11/13/2015	10/3/16 8:52 AM
EUTH	OWN REQ		EUTH	MANGE		10/16/2015	10/3/16 8:54 AM
EUTH	OWN REQ		EUTH	MANGE		10/14/2015	10/3/16 8:55 AM
EUTH	OWN REQ		EUTH	MANGE		10/14/2015	10/3/16 8:55 AM

Source: Compiled by County Auditor from Chameleon System.

We reviewed in detail a sample of owner requested euthanasia changes performed by the Director and noted, 16 of 30 (53%) did not have appropriate supporting evidence to justify the changes from euthanasia (which affects live release statistics) to owner requested euthanasia, (which does not affect live release statistics). Table 5 is a screen shot taken directly from Chameleon (software used by the agency) showing changes made to a record, which did not include support for owner requested euthanasia, 10 months after the original disposition.



Source: Compiled by County Auditor from Chameleon System.

In addition, a batch of 252 kennel record changes performed by an information technology resource did not have documentation of management's approval; however, during discussions with management, they asserted the changes were appropriate. We cannot confirm the accuracy of these assertions by management.

Unauthorized and inappropriate changes made to system records reduces management's ability to rely on the information generated by the system. System changes should be adequately tested, reviewed, authorized and logged. Opportunity For Improvement No. 2 provides additional issues relating to documentation of euthanasia.

Since the Director is no longer employed by the County, we have no further recommendation regarding disciplinary action regarding the Director. We found no verifiable evidence that other employees were involved in inappropriate changes to the recorded euthanasia.

We recommend management:

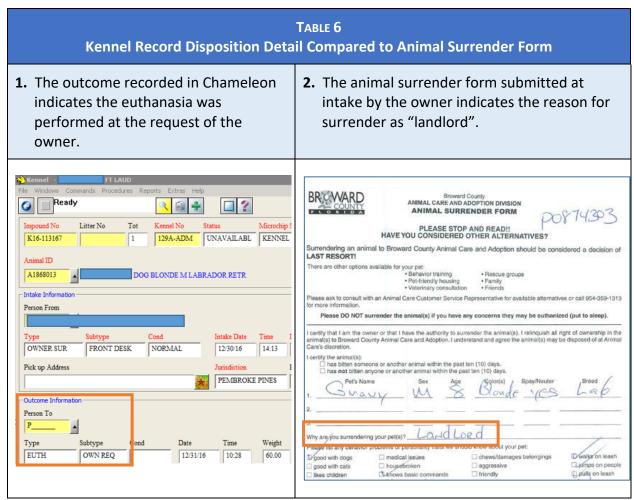
- A. Implement monitoring controls to review changes to kennel records for accuracy, adequate supporting documentation, and appropriate authorization to assist in identifying and resolving errors and irregularities.
- B. Implement a formal change management process to document, test and authorize system configurations changes and upgrades, report development and maintenance, mass updates to data, or any other activity that could potentially affect the integrity of the system, its data, and the reports generated.

Management Response:

See APPENDIX - A for County Administration's response.

2. Some Animals Were Euthanized Without Adequate Supporting Documentation.

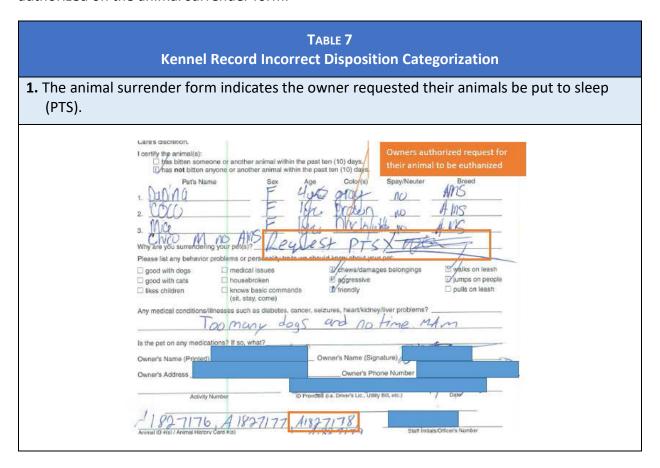
Thirty-two of 96 (33%) kennel records reviewed and labeled as owner requested euthanasia were inappropriately categorized in Chameleon. For 26 of the 32 (81%) records identified, the animal surrender forms did not contain evidence that the owner requested euthanasia. Table 6 provides an example of a comparison between animals disposition in Chameleon compared to the corresponding animal surrender form.

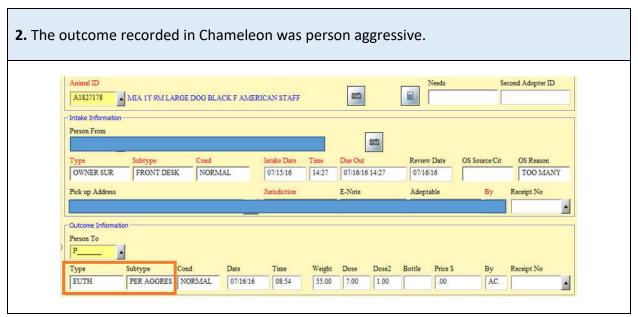


Source: Compiled by County Auditor from Chameleon System and Animal Surrender Form.

Six of the 32 (19%) records did not have a corresponding form in Chameleon or the shared drive and did not include supporting evidence in the system that the owner had requested euthanasia.

Additionally, we reviewed 64 kennel records for euthanized animals labeled as animal or person aggressive and noted that three of the 64 (5%) kennel records were inappropriately categorized in Chameleon. These labels did not correspond to the owner's signed request to have their animal put to sleep. The result of animals not being labeled as owner requested euthanasia would negatively impact performance measure statistics. Table 7 represents a transaction that was labeled as a person aggressive euthanasia instead of an owner requested euthanasia as authorized on the animal surrender form.





Source: Compiled by County Auditor from Chameleon System and Animal Surrender Form.

For every kennel record that indicates the owner requested euthanasia, there should be a corresponding owner authorization. Kennel records should match owner requests and owner requested euthanasia should be honored or sufficient documentation should exist to justify why the owner's request was not executed.

The failure to maintain accurate records increases the liklihood of error and may cause harm to animals in the care of ACAD. In addition, the failure to honor owner requests may increase the County's legal risk.

We recommend management:

- A. Implement procedures to ensure that each owner requested euthanasia record is reviewed for accuracy, adequate supporting documentation, and authorization.
- B. Ensure adequate steps are taken to maintain adequate supporting documentation as well as management's authorization for the decision in cases where the owner has requested euthanasia and ACAD deems it appropriate to release or adopt the animal.

Management Response:

See **APPENDIX** - **A** for County Administration's response.

3. Inadequate Internal Controls Allowed Inappropriate Actions to Occur.

ACAD has not implemented adequate manual or automated controls to appropriately segregate job duties to ensure that approved procedures and business processes are followed to reduce the risk of errors and irregularities. As noted in Opportunity For Improvement No. 1, the Director manually modified 218 of 302 (72%) of kennel records where euthanasia was changed to owner requested euthanasia between October 1, 2015 and August 1, 2017, while ACAD's procedures did not require, authorize, or prohibit the Director to perform data entry functions. These activities should be performed by lower level staff, and the Director should be prohibited from performing these functions.

Segregation of duties is a preventive control designed to preclude improper activity and is essential to ensure that errors or irregularities are detected timely during the normal course of business. Failure to implement appropriate segregation of duties increase the risk of error and fraud. Had proper segregation of duties been present, the Director would have not been allowed to perform the inappropriate changes to the records.

We recommend management:

- A. Ensure job duties are adequately segregated and aligned with policies and procedures to help ensure errors and irregularities are prevented or detected on a timely basis to reduce the risk of error and fraud.
- B. Implement access controls such as role based security that ensure functions including data entry, transaction approval, and quality control are adequately segregated and in alignment with business processes and standard operating procedures.
- C. Prohibit the Director from having access to data entry functions.

Management Response:

See **APPENDIX** - A for County Administration's response.

4. Kennel Intake Records did not Consistently Match Information Submitted by Owners or Were Incomplete.

Animal intake information in Chameleon did not consistently match the information submitted by owners on the animal surrender forms or were incomplete. Table 8 provides an example of a mismatch between a kennel record and an animal surrender form.

Table 8 Kennel Record Intake Reason Mismatch With Animal Surrender Form				
1. The animal surrender form in	dicates the	surrender reasor	was "too m	any".
Animal ID A1901826 WEDNESDAY 4M KITTY CAT	FBLACK S DOME	STIC SH	Needs	Second Adopter ID
Person From				
Type Subtype Cond OWNER SUR FRONT DESK NORMAL	Intake Date 06/30/17	Time Due Out 13:36 06/30/17 13:36		OS Source/Cit OS Reason TOO MANY
2. On the owner surrender form	n the surren	der reason was li	sted as "mov	ring".
I certify that I am the owner or that I have animal(s) to Broward County Animal Care Care's discretion.				
I certify the animal(s): _ has bitten someone or another a _ has not bitten anyone or anothe				
Pet's Name	Sex	Age Color(s)	Spay/Neuter	Breed
1. <u>heo</u>	May _	Black		
2.	I _	Browns		
a ibilla theel	MA	Black)	
Why are you surrendering your pet(s)?_	FN	wing.	_	*

Source: Compiled by County Auditor from Chameleon System and Animal Surrender Form.

During our review, we noted the following:

A. The intake details for 28 of 220 (13%) kennel records tested in Chameleon did not match the owner provided animal surrender form. See Table 6 for an example comparison between kennel records and animal surrender forms.

- B. Four of 60 (7%) kennel records categorized with an intake type of owner surrender in Chameleon did not have a required owner surrender form, and contained insufficient evidence to validate the legitimacy of the intake type.
- C. 118 of 220 (54%) animal surrender documents, stored in the two locations (shared drive and Chameleon), contained documents that were mismatched, missing, or were devoid of the entire animal surrender package.

Animal intake information entered into Chameleon should match the animal surrender form information provided by the owner. In instances where an animal surrender form could not be obtained (e.g. animal rescue), sufficient documentation should be created within Chameleon to establish the validity of the intake type. Documentation stored within Chameleon should be legible.

Failure to ensure accurate data entry leads to incorrectly reported operations details and performance metrics relied on to make business decisions, and the inability to rely on system records for operational, performance and management reporting.

We recommend management:

- A. Review and update animal intake documentation procedures to ensure intake data entered into Chameleon is validated for accuracy against the animal surrender form,
- B. Implement procedures to ensure kennel records in Chameleon are adequately documented with supporting evidence when categorizing intake records as owner surrendered in instances where an animal surrender form could not be obtained.
- C. Ensure that required animal intake documentation, including owner surrender forms, is completed appropriately, scanned in sufficient quality to facilitate quality control checks, and retained according County document retention policies. Primary and backup storage locations used to store animal intake records should contain identical information.

Management Response:

See APPENDIX - A for County Administration's response.

5. Inaccurate Intake and Outcome Categories Were Used to Calculate Performance Measures.

Animal intake and outcome events in Chameleon are inappropriately applied to the calculaton of performance measures increasing the liklihood of inaccurate reports, poor management decisions, and undetected operational anomalies. During our review, we noted issues with the following performance measures:

A. Two of 24 (8%) outcome categories are inappropriately filtered from LRR calculations based on management and staff assertion of actual usage. The "INV CORR" and

"MISSING" categories are used to record animals that have gone missing without explanation. Excluding these categories from the LRR calculation results in an understatement in the "Lost/Missing/Unaccounted For" statistic resulting in an overstatement of the LRR.

- B. One of 24 (4%) outcome categories is inappropriately added to Owner requested Euthanasia Counts counts based on management's assertion of actual usage. The "REVIEW" category is used as part of the workflow process to add the animal to a supervisory report for validation of the proposed animal disposition. The final disposition is updated after the review. Including this category in reporting filters may result in an overstatement of this statistic.
- C. The outcome category "EUTH REQ" has historically been used to capture owner requested euthanasia. At the time of our review, although the category was no longer in use, it had been used in fiscal year 2017. We noted that reports used to capture performance measures exclude records labeled with this category. Although going forward the impact will dimish, excluding this category from reporting filters will result in an understatement of owner requested euthanasia statistics. Benchmarks used, for example, to measure the effectiveness of programs aimed at the diversion of owner requested euthansia, would be impacted by the historical mistatement caused by the exclusion of these records.

Performance measure calculations should comply with a well defined and documented methodology to ensure accuracy and reporting transparency.

We recommend management review the categories used to calculate performance metrics for accuracy and reporting transparency.

Management Response:

See **APPENDIX** - **A** for County Administration's response.

6. Policies and Procedures are not Adequate or Consistently Followed to Ensure Compliance With County Policy.

ACAD's policies and procedures are not consistently followed, do not adequately define and segregate responsibilities, and do not specify operational processes to ensure compliance with County policy. Specifically, we noted the following:

A. Euthanasia Procedures

- i. Documented procedures do not adequately cover owner requested euthanasia intake or outcome processes.
- ii. Documented procedures require a panel with the authority to approve animal euthanasia. This panel is not in place.

- iii. Approval processes for immediate euthanasia where a panel review is not required (e.g. neonatal or orphaned kittens wheighing less than 1lb) are not defined.
- iv. Documented procedures do not require a review process or adequate supporting documentation for immediate euthanasia for animals who are determined to be enduring extreme suffering.
- B. Documented procedures do not adequately establish roles and responsibilities for various data entry, operational, supervisory, and quality control processes.
- C. Documented procedures do not address minimum confinement standards established by Broward County Ordinances that must be considered prior to euthanasia.

Documented procedures should align with Broward County Ordinances governing ACAD's operations. Procedures should be complete and establish roles that effectively separate incompatible job functions (i.e., data entry and approval). Failure to publish comprehensive procedures increases the risk of error, inppropriate or unauthorized activity, reduces reliance on operational data, and may cause harm to the animals in the care of ACAD.

We recommend management review and update documented policies and procedures to reduce the risk of error, inappropriate or unauthorized activity, increase reliance on operational data, and comply with County Policy.

Management Response:

See APPENDIX - A for County Administration's response.

APPENDIX A – Management Response



BERTHA W. HENRY, County Administrator

115 S. Andrews Avenue, Room 409 • Fort Lauderdale, Florida 33301 • 954-357-7362 • FAX 954-357-7360

TO:

Robert Melton, County Auditor

FROM:

Bertha W. Henry, County Administrator

DATE:

March 8, 2018

SUBJECT:

Response to County Auditor's Special Review of Animal Care & Adoption Division

Performance Records and Reporting

The above-referenced County Auditor's report, prepared pursuant to a request from County Administration, has been received and reviewed. Management fully accepts the Auditor's findings and agrees to implement all of the recommended enhancements. Many of the findings and recommendations relate to the shelter case management system software (Chameleon/CMS) used to manage and track animal shelter operations. While this system is widely used by numerous Animal Control agencies, including Miami Dade and Palm Beach Counties, management concurs with the shortcomings identified by the Auditor and will implement interim solutions while concurrently researching alternative systems to provide enhanced data integrity. The remaining findings and recommendations involve updates to standard operating procedures (SOP). The updated SOP's (attached) are responsive to the Auditor's recommendations. It is noted that these SOP's have been implemented and may be further enhanced by the recently hired Director of Animal Care and Adoption.

The following is Management's detailed response to each of the Auditor's findings and recommendations.

Finding 1: "Unsupported changes to euthanasia records were made by the former Director"

Recommendation A: "Implement monitoring controls to review changes to kennel records for accuracy, adequate supporting documentation, and appropriate authorization to assist in identifying and resolving errors and irregularities."

Response A: Agree. Once management became aware of the issue, the former Director's process of changing outcomes during quality control reviews was suspended immediately. Staff subsequently conferred with the software vendor (Chameleon) and it was determined by the vendor that limiting user access and requiring authorization for status changes is not within the current business model of the vendor. Therefore, staff has begun to pursue other

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available software options and is investigating the feasibility of creating an animal care module within the existing POSSE system. The alternative system is planned to be in place within 12 months. In the meantime, the Chameleon vendor has indicated it is possible to automate report creation to highlight any kennel record changes within the existing system for further review. In addition, Animal Care staff is working with ETS staff to establish a periodic access review process.

Recommendation B: "Implement a formal change management process to document, test and authorize system configuration changes and upgrades, report development and maintenance, mass updates to data, or any other activity that could potentially affect the integrity of the system, its data, and the reports generated."

Response B: Agree. Staff conferred with the software vendor and creating a change control process for Chameleon which mimics the change control processes currently employed in the POSSE system is not possible within their existing system and that making the necessary changes would not be consistent with their current business model. Therefore, staff has begun to pursue available software options and is investigating the feasibility of creating an animal care module within the existing POSSE system. The alternative system is planned to be in place within 12 months. In the meantime, the Chameleon vendor has indicated it is possible to create a separate test environment in Chameleon to review proposed system changes prior to production. This will help ensure any configuration changes, updates or upgrades, any report changes or any other alterations to the system and its data are properly tracked, tested, documented and authorized.

Finding 2: "Some animals were euthanized without adequate supporting documentation"

Recommendation A: "Implement procedures to ensure that each owner requested euthanasia record is reviewed for accuracy, adequate supporting documentation and authorization."

Response A: Agree. Upon notification of alleged improper changes to certain records, staff immediately began utilizing an updated owner surrender form and created a new "Owner Request for Euthanasia" form to ensure that the owner is properly informed and has expressly requested euthanasia (Attachment A). In addition, the standard operating procedures (SOP) for accepting owner surrendered pets (Attachment B) and the data entry SOP for owner surrenders (Attachment C) were revised to ensure proper supporting documentation is provided for all instances of owner requested euthanasia.

Recommendation B: "Ensure adequate steps are taken to maintain adequate supporting documentation as well as management's authorization for the decision in cases where the owner has requested euthanasia and ACAD deems it appropriate to release or adopt the animal."

Response B: Agree. The updated "Owner Request for Euthanasia" form expressly informs the owner that "...the final decision to euthanize the pet(s) will be at the discretion of Broward County Animal Care and Adoption Division." and requires the owner's acknowledgement. In addition, the above mentioned revised owner surrender SOP's now require documentation of

the specific reasons for denying the owner's request for euthanasia and management's approval thereof.

Finding 3: "Inadequate internal controls allowed inappropriate actions to occur"

Recommendation A: "Ensure job duties are adequately segregated and aligned with policies and procedures to help ensure errors and irregularities are prevented or detected on a timely basis to reduce the risk of error and fraud."

Recommendation B: "Implement access controls, such as role based security, that ensure functions including data entry, transaction approval, and quality control are adequately segregated and in alignment with business processes and standard operating procedures."

Response A and B: Agree. Staff conferred with the software vendor and determined segregating user permissions using role-based security and adhering to the principle of least privilege is not within their business model. Therefore, staff has begun to pursue other available software options. Additionally, staff is also investigating the feasibility of creating an animal care module within the existing POSSE system. The alternative system is planned to be in place within 12 months. In the meantime, Staff is working with the software vendor to lock down access as much as possible using the principles of least privilege and create an automated report for highlighting kennel record changes for review. Staff has also conferred with ETS to institute a comprehensive Access Request Form process for Chameleon, formalize the access request process between ETS and Animal Care, and establish a periodic access review process.

Recommendation C: "Prohibit the Director from having access to data entry functions."

Response C: Agree. Write access for the Director, Assistant Director and all other non-essential personnel has been eliminated.

Finding 4: "Kennel intake records did not consistently match information submitted by owners or were incomplete."

Recommendation A: "Review and update animal intake documentation procedures to ensure intake data entered into Chameleon is validated for accuracy against the animal surrender form."

Response A: Agree. The standard operating procedure (SOP) for accepting owner surrendered pets and the data entry SOP for owner surrenders have been revised to ensure proper data entry and to institute data validation (audit) procedures.

Recommendation B: "Implement procedures to ensure kennel records in Chameleon are adequately documented with supporting evidence when categorizing intake records as owner surrendered in instances where an animal surrender form could not be obtained."

Response B: Agree. The standard operating procedure (SOP) for data entry involving owner surrenders has been revised to ensure a Kennel Memo is uploaded into Chameleon to

memorialize the change in status from Stray to Owner Surrender in all cases where an Owner Surrender Form cannot be obtained.

Recommendation C: "Ensure that required animal intake documentation, including owner surrender forms, is completed appropriately, scanned in sufficient quality to facilitate quality control checks, and retained according to County document retention policies. Primary and backup storage locations used to store animal intake records should contain identical information."

Response C: Agree. The standard operating procedure (SOP) for owner surrender and owner requested euthanasia intake have been revised to provide additional guidance for staff and supervisory audit procedures are utilized to ensure all documentation is completed appropriately and scanned in high resolution. Staff also conferred with the software vendor and is creating specifications to enhance the image quality of documents stored in Chameleon.

Finding 5: "Inaccurate intake and outcome categories were used to calculate performance measures."

Recommendation: "Management should review the categories used to calculate performance metrics for accuracy and reporting transparency."

Response: Agree. The categories used to calculate the intake and outcome categories have been revised and the data reporting format amended to replicate the Asilomar Accord definitions (Attachment D). In addition, some changes were made to various categorical fields within the system to more accurately describe the nature of the intake status of the animals, consistent with industry best practices.

Finding 6: "Policies and procedures are not adequate or consistently followed to ensure compliance with County policy."

Recommendation: "Management should review and update documented policies and procedures to reduce the risk of error, inappropriate or unauthorized activity, increase reliance on operational data and comply with County policy."

Response: Agree. The euthanasia review panel has been incorporated into the process flow and Chameleon has been updated to require that signed approval documentation from this panel be uploaded to the system in all euthanasia cases. In addition, the procedures allowing immediate euthanasia have been revised to provide clear guidance and a formal after the fact review process to verify proper application of the procedures (Attachment E). (As an example, a signed document from the review panel that the proper procedures were followed and an after the fact finding that the euthanasia was or was not justified must be uploaded into the system.) Staff also conferred with ETS to institute a comprehensive Access Request Form process for Chameleon, formalize the access request process between ETS and Animal Care and establish a periodic access review process to ensure the proper segregation of duties and principles of least privilege are maintained.

Attachments

cc Mayor and Board of County Commissioners
Monica Cepero, Deputy County Administrator
Andrew Meyers, County Attorney
Henry Sniezek, Director, EPGMD
Leonard Vialpando, Deputy Director, EPGMD
Stefanie Chicko, Assistant Director, Animal Care and Adoption

Attachment A. Page 1 of 1.



ANIMAL CARE AND ADOPTION DIVISION

2400 SW 42nd Street • Fort Lauderdale, Florida 33312 • 954-359-1313 • Broward.org/Animal

OWNER REQUEST FOR EUTHANASIA

I understand that I am surrendering my pet(s) to the Broward County Animal Care and Adoption Division for the purposes of euthanasia.

I also understand that the final decision to euthanize the pet(s) will be at the discretion of Broward County Animal

Owner's Name:		Owner	s Signature:		-9
Owner's Address:			Phone:		-
ype of Identification:		ID Number:			_
Date of Request:			_		
Pet's Name	Dog/Cat	Age	Color(s)	Spay/Neuter	Sex
Reason for euthanasia:	-		-		
		or that I ha	ve the legal authori	y to surrender this pet a	and reques
I certify that I am the that the pet be euth	anized.				
that the pet be euth I certify that this pe has bitte has not b					
that the pet be euth I certify that this pe has bitte has not b	t: en someone or anot pitten anyone or ar	other anima		n (10) days.	Sex
that the pet be euth I certify that this pe	t: en someone or anot bitten anyone or ar Dog/Cat	Age	Color(s)	Spay/Neuter	Sex
that the pet be euth I certify that this pe has bitte has not I AID# Pet's Name Reason for euthanasia:	t: en someone or anot pitten anyone or an Dog/Cat ne owner of this pet	Age	Color(s)	Spay/Neuter	
rhat the pet be euth I certify that this pe has bitte has not I AID# Pet's Name Reason for euthanasia: I certify that I am th that the pet be euth I certify that this pe has bitte	t: en someone or anot pitten anyone or ar Dog/Cat ne owner of this pet nanized.	Age or that I have	Color(s) ve the legal authori	Spay/Neuter ty to surrender this pet a	

Attachment B. Page 1 of 7.

General SOP	Owner Surrender Intake	Admissions
Effective/Review Date: 2/5/18	Approved by:	

Broward County Animal Care and Adoption

Standard Operating Procedures



Purpose

This procedure establishes standardized guidelines for accepting owner surrendered pets. It is possible that personnel will find themselves in situations not specifically addressed in this procedure. In those cases, personnel must use discretion and sound judgment; and direct questions to their supervisor.

II. Definitions

- An owner is any natural person, firm, association, or corporation that owns, keeps, or harbors an animal. For purposes of this chapter, the knowledge and acts of agents and employees of business entities in regard to animals transported, owned, employed by, or in the custody of a business entity shall be deemed to be the knowledge and act of such business entity. If the owner is a minor as defined by statute, the minor's parent(s) or legal guardian(s) shall be deemed the owner for purposes of this chapter.
- An owner surrender is the process by which an owner, or a person with authority to act on behalf of the owner, as that term is defined above, may turn in an unwanted pet(s) to the Division. The owner relinquishes custody, control, and ownership to the Division. Citizens who have had the pet(s) in their custody for more than thirty (30) days are considered the owner for the purposes of the Division's intake procedures.
- An owner request (for euthanasia) is the process by which an owner, or person with legal authority to act on behalf of the owner, turns in their pet with the intent and for the expressly stated purpose of having that pet humanely euthanized. Evidence of legal authority may consist of a power of attorney, death certificate, or written statement with copy of government id. The owner relinquishes custody, control, and ownership to the Division.

Please Note: In the case of a **Deceased owner**: if the person turning in the pet is a family member or person with legal authority, the intake is treated as an owner surrender. If the person turning in the pet is a friend, neighbor, or someone without legal authority, the intake is treated as a stray.

Attachment B. Page 2 of 7.

General SOP	Owner Surrender Intake	Admissions
Effective/Review Date: 2/5/18	Approved by:	

III. Procedure

There are various reasons a person must surrender an animal. As difficult as it can be, staff must refrain from expressing any personal opinions or body language that may be interpreted as offensive by the customer.

Most customers surrendering a pet are unfamiliar with shelter policies, processes and procedures and may request more information prior to deciding their course of action. Accordingly, it is recommended that staff first speak with the customer and answer any questions they may have prior to beginning the data entry process.

Once it is determined that the animal being brought to the shelter is owned by the person bringing it in or someone with legal authority to act on behalf of the owner, staff must determine the owner's intent in bringing the pet(s) to the Division.

If the owner's intent and purpose is to bring their pet(s) to the Division for the purpose of humane Euthanasia, they must complete an **Owner Request for Euthanasia** form. If the owner's intent is for the Division to attempt to find a new home for their pet(s), they must complete an **Owner Surrender** form.

If the person is surrendering the pet(s) on behalf of the true owner due to the owner's incapacity or inability, staff should exhaust all reasonable attempts to make direct contact with the true owner to confirm their intent and knowledge of the surrender, as well as the person's authority to sign an Owner Surrender/Owner Request for Euthanasia form on their behalf. If no contact is able to be made, the intake will be treated as an Owner Surrender, with an additional memo attached to the animal id detailing the circumstances of the surrender.

Condition

Once the owner has completed and handed over the applicable form to the Customer Service Representative (CSR), the CSR shall review the form closely to confirm all fields are completed and the form has all the required signatures. Any missing or unclear data should be clarified and corrected by the customer on the form itself. If the customer identifies multiple reasons for the surrender, the CSR should try to ascertain from the customer the primary or controlling reason for the surrender and enter into Chameleon accordingly, notating any additional relevant information in a

Attachment B. Page 3 of 7.

General SOP	Owner Surrender Intake	Admissions
Effective/Review Date: 2/5/18	Approved by:	

memo attached to the animal id. In Chameleon, the CSR should enter PEND EXAM under both the Intake Cond field of the Kennel Screen and the Condition field of the Animal Id screen.

Upon review, if the CSR determines that the pet(s) has any medical condition and/or behavioral attribute that would negatively impact adoptability, the CSR shall reiterate the information presented on the attached exhibit "A" under Customer Communication for Owner Surrenders and explain that due to their pet's specific behavior, age, or condition, adoption is unlikely.

Once completed fully, the original form is kept by the CSR, scanned to both the customer's PID and the G:\ACAD\SHARED\Owner Surrender Forms, and a copy provided to the customer.

Verbal Owner Surrenders

There are frequently occasions where it becomes necessary to obtain a verbal owner surrender, usually due to the inability of the owner to come to the Division, or to come to the Division within a reasonable amount of time. Some examples for this include but are not limited to:

- A hospitalized owner;
- A non-local owner;
- An owner who may not be emotionally prepared to say goodbye to their pet in this setting and may send a friend or family member to surrender the pet on their behalf.
- A stray whose owner is <u>later</u> identified (subsequent to the intake,) and contact made by telephone;
- A stray who is turned in by the owner as a stray but later (subsequent to the intake) traced to them via microchip.

In such cases, the "owner surrender" should be obtained by a CSR over the telephone, including a witnessing CSR to double-verify the surrender. If the owner is available via email or fax, those methods should also be employed to attempt to gain an owner surrender in writing as quickly as possible after the intake process. The communication with the customer via telephone should be as indicated on the attached Exhibit "A" Customer Communication for Owner Surrenders. If the CSR is

Attachment B. Page 4 of 7.

General SOP	Owner Surrender Intake	Admissions
Effective/Review Date: 2/5/18	Approved by:	

able to obtain a fax authorization, email, letter, or other form of written document confirming the intent to owner surrender, that documentation should be scanned into the G:Drive, as well as the person id (PID).

Owner Requests for Euthanasia should <u>always</u> include an executed form. However, where the true owner is unable, incapacitated, or deceased, a person with legal authority to act on their behalf may sign the written request. If the true owner is available by telephone, a verbal confirmation of the Owner Request for Euthanasia should also be sought in addition to the executed form. The verbal conversation should be double-verified by two (2) CSR's and entered as a memo attached to the Animal id and Person Id.

The executed Owner Request for Euthanasia form shall be scanned into both the PID of the owner and the G: drive and a memo attached to both the animal aid (AID) and person id (PID) detailing the conversation and identifying both witnessing staff members. If a person is surrendering the pet(s) on behalf of the owner, the executed form should also be scanned to their PID.

Verbal Owner Surrenders SUBSEQUENT To Intake

In addition to following the above procedures, when an owner surrender is obtained subsequent to the point of intake, the CSR must create a Kennel Memo in Chameleon to memorialize the updated change in status from Stray to Owner Surrender. The procedures for creating the kennel memo is contained in the **Data Entry for Owner Surrenders** standard operating procedure.

When an Intake Update is made after the point of intake, staff shall also:

- 1. Update the status field of the kennel screen in Chameleon to OwnSurrend(er);
- 2. Change the Due out Date to the current date; and
- 3. Send an email to the kennel supervisors and clinic supervisors notifying them of the change in status.

If the animal is listed on that owner's record in Chameleon, the tag screen can also be updated to show SURRENDER.

Attachment B. Page 5 of 7.

General SOP	Owner Surrender Intake	Admissions
Effective/Review Date: 2/5/18	Approved by:	

Owner Requested Euthanasia SUBSEQUENT to Intake

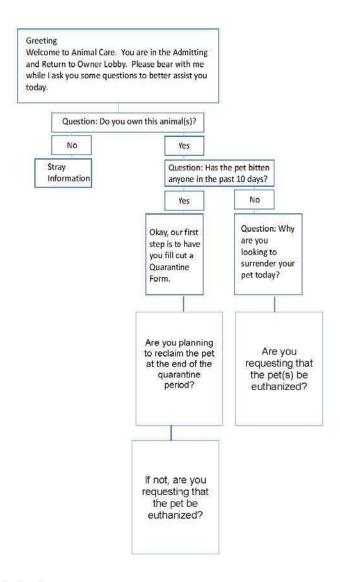
The Division has the discretion to pursue an outcome other than euthanasia for pet(s) that have been surrendered to the Division for the purposes of Owner Requested Euthanasia (ORE). Reversal of the owner's wishes require specific and documented reasons for denying the pet's euthanasia. No one person is allowed to make this decision. ORE reversals must be brought before the Pathway Planning Panel (Panel) for review. Reversal recommendations also require management approval by the Director or their designee.

If the panel agrees, they must complete the Owner Requested Euthanasia Reversal form and provide it to the Director or their designee for review. After review, the Admitting or Kennel Animal Care Supervisor will receive the form back with either an approval to reverse the euthanasia or a rejection indicating the owner's wishes need to be followed. If management rejects the reversal, the next step is the Verification process that is outlined in the Euthanasia SOP. If management approves the reversal, the recipient Animal Care Supervisor uploads the completed form into the animal management software and the panel pursues other lifesaving options for the pet.

Attachment B. Page 6 of 7.

General SOP	Owner Surrender Intake	Admissions
Effective/Review Date: 2/5/18	Approved by:	

Conversation Process Flow



Attachment B. Page 7 of 7.

General SOP	Owner Surrender Intake	Admissions
Effective/Review Date: 2/5/18	Approved by:	

Exhibit "A"

Customer Communication for Owner Surrender

Please be advised this is an Open-Admission facility which takes in a high volume of animals. Since we take in a large number of stray animals on a daily basis, we are not able to guarantee being able to place an owned pet up for adoption. We evaluate based on health and temperament but due to continuously changing circumstances, including changes in health and behavior, owner surrenders are always at greater risk for euthanasia. There is no required holding time for owner surrenders and the decision to euthanize could be made immediately at the time of surrender. If you have any concerns about the possibility of your pet being euthanized, we can give you information on other resources as an alternative to surrender.

Customer Communication for Owner Request for Euthanasia

Please be advised that surrendering your pet(s) for euthanasia means that you are relinquishing ownership. Once surrendered, final discretion over the decision to euthanize will be at the Division's election.

Attachment C. Page 1 of 11.

General SOP	Data Entry Owner Surrender Intake	Admissions
Effective/Review Date: 2/9/18	Approved by:	

Broward County Animal Care and Adoption

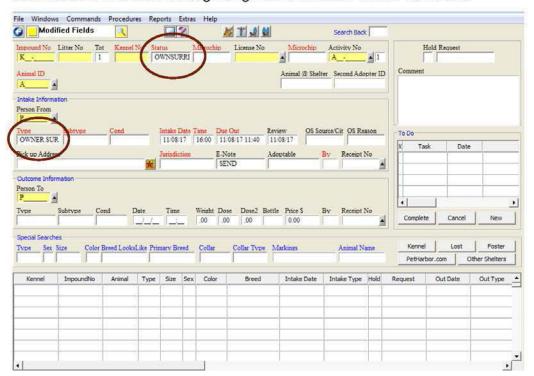
Standard Operating Procedures



I. Data Entry Protocol for Owner Surrenders

It is imperative that information is captured accurately in Chameleon. The designation of an animal as an "owner surrender" versus "stray" has important legal ramifications and may determine the outcome for that animal in our facility.

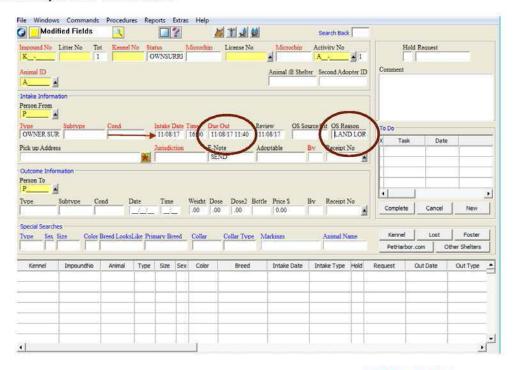
Once it has been determined that the person turning in the animal(s) is the owner, and that person has signed an **Owner Surrender Form**, a record must be created in Chameleon designating the intake as an Owner Surrender.



Attachment C. Page 2 of 11.



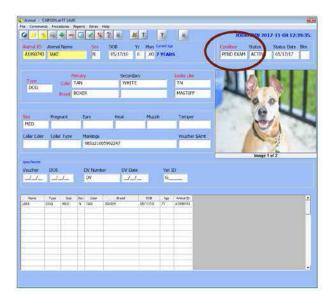
The reason for the Owner Surrender (OS Reason) will be indicated on the kennel screen and it should match as much as possible the reason provided on the customer's Owner Surrender Form. Staff will designate the Due Out Date as the same day as the intake date.



The condition of the animal being intaked will be identified as PEND EXAM on both 1) the <u>kennel screen</u> and 2) the <u>animal ID screen</u> until such time as the veterinary staff can assess and update both records.

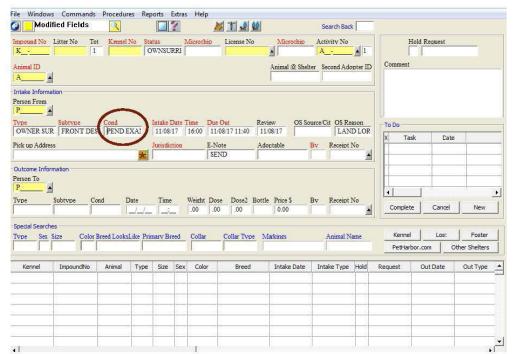
Attachment C. Page 3 of 11.

General SOP	Data Entry Owner Surrender Intake	Admissions
Effective/Review Date: 2/9/18	Approved by:	



Attachment C. Page 4 of 11.





Once stored on the kennel record, the owner's **Owner Surrender Form** will be scanned and saved as an image file. This file will be uploaded using ChamCam to the Person ID record. The original form will be provided to the Admitting Supervisor.

At random, the Animal Care Admitting Supervisor validates Owner Surrender records. The validation will include review of the following:

- A complete and signed Owner Surrender form is linked to the PID in the animal management database and is stored in high quality resolution.
- The reason for the Owner's Surrender matches the most appropriate category in the animal management database or has a memo noting the variation.
- The name of the pet, age and sex match the information entered into the animal management database or has a memo noting the variation.

Attachment C. Page 5 of 11.



- Any bite information indicated on the form has been entered as a comment on the kennel screen, a quarantine hold has been placed when applicable, and a bite report completed when applicable.
- The owner's name matches the PID or has a memo explaining the difference.

The validation is conducted on a weekly basis and a minimum of 10 Owner Surrender records are reviewed per each validation, unless fewer than 10 animals were surrendered that week. If 1 out of 10 records contains errors, an additional minimum of 10 Owner Surrender records are to be resampled and reviewed, until no errors as outlined above persist within the sampled records. The validation review findings are tracked by the Admitting Supervisor using an Excel Spreadsheet, which is stored on the G-Drive in a protected but management accessible folder.

To ensure segregation of duties, if information on the Owner Surrender form is different from the information entered into the animal management software, the Admitting Supervisor will send an e-mail to the staff who entered the Owner Surrender data on the record and indicate the correction needed. That staff person will make the changes and create a memo to reflect the error and corresponding correction. To confirm corrections, this staff person will reply to the Admitting Supervisor's e-mail with a confirmation that the changes were made. E-mails to staff who report to other Division sections will include the staff supervisor for that employee.

II. Data Entry Protocol for Owner Requests for Euthanasia

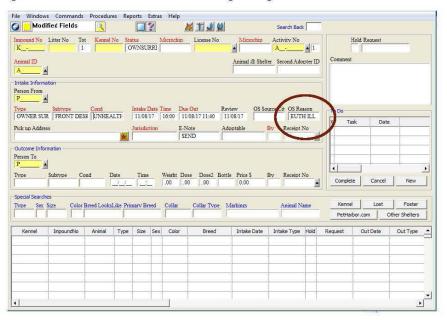
If the person turning in the animal(s) is the owner or person with legal authority to act on behalf of the owner, and that person has indicated that they are surrendering their pet(s) for the expressly stated purpose of euthanasia, they must complete and sign an **Owner Request for Euthanasia Form**. Once the form is completed and signed, staff must create an intake record in Chameleon designating the intake as an Owner Request for Euthanasia.

The process for entering the intake of an Owner Request for Euthanasia into Chameleon is substantially the same as that of an Owner Surrender, with two differences:

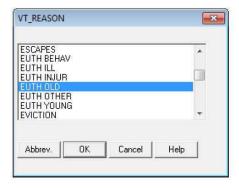
Attachment C. Page 6 of 11.



1. The Owner Surrender reason (OS Reason) shall specifically be designated as one of the selections beginning with "EUTH"



The reason selected should include one of the six EUTH reasons listed in Chameleon and should match, as closely as practical, the reason listed on the Owner's **Owner Request for Euthanasia Form**:



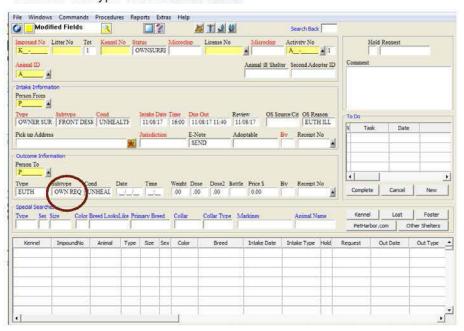
Attachment C. Page 7 of 11.

General SOP	Data Entry Owner Surrender Intake	Admissions
Effective/Review Date: 2/9/18	Approved by:	

Owner Requested Euthanasia SUBSEQUENT to Intake

The Division has the discretion to pursue an outcome other than euthanasia for pet(s) that have been surrendered to the Division for the purposes of Owner Requested Euthanasia (ORE). If the reversal of the ORE is approved, the next step is void and an approved Owner Requested Euthanasia Reversal form will be stored in the animal management database. If there is no approved ORE reversal, proceed to step two to complete the data entry.

2. Upon disposition of euthanasia for an Owner Requested Euthanasia, the outcome subtype will be OWN REQ.



Immediately upon storing the intake record, staff will immediately scan the **Owner Request for Euthanasia Form** and save as an image file. This file will be

Attachment C. Page 8 of 11.

General SOP	Data Entry Owner Surrender Intake	Admissions
Effective/Review Date: 2/9/18	Approved by:	

uploaded using ChamCam to the Person ID record. The original form will be provided to the Admitting Supervisor.

Admissions staff will immediately notify the Veterinary staff of an Owner Request for Euthanasia <u>upon intaking the animal</u>.

III. Data Entry Protocol for Verbal Owner Surrenders

If a verbal owner surrender is able to be obtained from the true owner at the point of intake, the intake will be treated as an Owner Surrender and data entry will proceed as in **I. Data Entry Protocol for Owner Surrenders** listed above.

In addition to the steps outlined in that section, in the case of a verbal owner surrender at the point of intake, staff must also create a memo explaining that the owner surrender was obtained verbally. The memo should be created using the OWNER SURRENDER memo template and attached to the Person Id of the owner, as well as the Animal Id.

Verbal Owner Surrenders SUBSEQUENT To Intake

In addition to following the above procedures, when an owner surrender is obtained <u>subsequent to the intake</u>, the CSR must create a <u>Kennel</u> Memo in Chameleon to memorialize the change in status from Stray to Owner Surrender. The procedures for creating the kennel memo are as follows:

1. Create a memo on the **kennel** screen using the drop-down menu from the Windows tab:

Attachment C. Page 9 of 11.





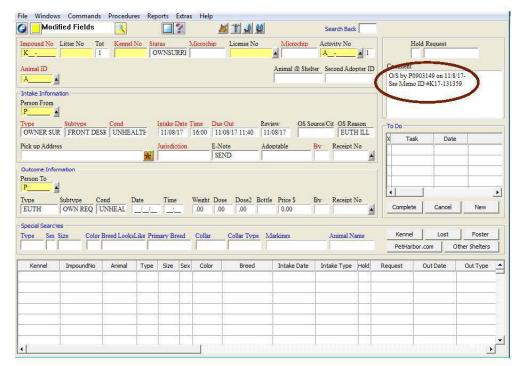
- 2. Memo ld: Type in the Kennel Impound Number for that animal;
- 3. Id Type: Impound No;
- 4. Memo Type: Note
- 5. Memo Subtype: Intake Upd(ate)
- 6. In the comment section of the memo, use the Owner Surrender template to outline the details of the conversation including, but not limited to:
 - Date of the conversation;
 - Owner/Owner's Representative Person ID;
 - Which 2 staff members witnessed the conversation; and
 - What statements were made by the owner indicating their decision to surrender the pet(s).
- 7. Store the new memo in Chameleon using F9.
- 8. Reopen the memo to confirm it is stored properly.
- VERY IMPORTANT- Create a note in the comment section of the kennel screen in the following format as a cross-reference: O/S by PXXXXXX on MM/DD/YY: See Memo Id #KYY-XXXXXX (refers to Kennel impound number for that record.)

G:\ACAD\AN\Standard Operating Procedures

9

Attachment C. Page 10 of 11.





- 10. To the extent possible, no other comments should be contained in the Comment Section. Any existing comments should be moved to a memo attached to the Animal Id with a reference in the comments: "SEE NOTES"
- In order to fully update all records, the kennel memo comment should be copied and pasted to an Animal Id memo as well as a memo on the owner's Person ID.

After completing the new Owner Surrender memo, additional steps must be taken to expedite the processing of that animal:

Attachment C. Page 11 of 11.

General SOP	Data Entry Owner Surrender Intake	Admissions
Effective/Review Date: 2/9/18	Approved by:	

- 1. Change the status on the kennel screen to Owner Surrender;
- 2. Change the due out date to the next calendar day following the conversation with the owner; and
- 3. Send an email to the kennel supervisors and clinic supervisors indicating the status update.

No changes should be made to the intake type or intake PID.

Attachment D. Page 1 of 1.

	123 123	Canine	Feline	Total
	LIVE INTAKE			
В	Stray/At Large			
С	Relinquished by Owner			
D	Owner Intended Euthanasia			
E	Transferred in from Agency			
F	Cruelty/Confiscate (Other Intakes)			
F	Born in the Shelter (Other Intakes)			
F	Returns (Other Intakes)			
G	Total Live Intake [B+C+D+E+F]			

	OUTCOMES	
Н	Adoption	
1	Return to Owner	
J	Transferred to Another Agency	
K	Return to Field	
L	Other Live Outcomes	
M	Subtotal: Live Outcomes [H+I+J+K+L]	
N	Died in Care	
0	Lost in Care	
Р	Shelter Euthanasia	
Q	Owner Intended Euthanasia	
R	Subtotal: Other Outcomes [N+O+P+Q]	
S	Total Outcomes [M+R]	
	Asilomar "Lite" Live Release Rate:	
	Canine Asilomar "Lite" Live Release Rate	
	Feline Asilomar "Lite" Live Release Rate	

Formula: M / (S subtract Q)

Attachment E. Page 1 of 4.

General	Euthanasia Review	ACS, Vet. Tech. Animal Care Supervisor, Manager
Effective/Review Date: 2-6-2018	Approved by:	500

Broward County Animal Care and Adoption

Standard Operating Procedures



PURPOSE

This document establishes standardized guidelines for determining a final disposition of humane euthanasia. It is possible that personnel will find themselves in situations not specifically addressed in this procedure. In those cases, personnel must use discretion and sound judgment; and direct questions to their chain of command.

II. GUIDELINES

GENERAL INFORMATION

Euthanasia is the most difficult aspect of animal sheltering. It is tragic for the animals involved and emotionally stressful for the certified euthanasia technicians. The kindness, compassion, and dignity shown to each animal is very important and must be consistently respected. No one person has the authority to make a decision regarding the euthanasia of an animal unless it means that in so doing it will cause prolonged suffering for the animal. When deemed necessary for medical or behavioral reasons, animals may be euthanized. Not all medical and behavioral issues are an automatic reason for recommending euthanasia.

PATHWAY PLANNING PANEL (PANEL)

Not all medical and behavioral issues are an automatic reason for recommending euthanasia. Euthanasia for behavioral or medical reasons must be brought before the Pathway Planning Panel (panel) for review except in cases where immediate euthanasia is necessary. See the Immediate Euthanasia section. The panel is made up of supervisors from the following sections (Clinic, Admitting, Kennel, and Customer service) as well as Rescue, Marketing, and Foster program coordinators. One of the County Veterinarians participates at least once weekly in this panel to discuss medical cases.

The panel's focus is to fast track animals to their best possible outcome, focus on promoting harder to adopt animals, and explore all options, marketing, partnerships, and community outreach to find the best positive outcome for the shelter animals while also working to reduce their length of stay in the shelter. Shorter

Attachment E. Page 2 of 4.

General	Euthanasia Review	ACS, Vet. Tech. Animal Care Supervisor, Manager
Effective/Review Date: 2-6-2018	Approved by:	

length of stay, in regards to positive outcomes means more time to work on the harder to place animals typically with longer length of stay. When an individual or Division section determines euthanasia is the only recommendation, this panel serves as the deciding group to ensure the possible life saving options have been pursued and the recommendation is the only remaining appropriate outcome for the animal. The panel together must evaluate each animal. After the parties have observed the animal, if all parties agree, the panel must complete the Euthanasia Form.

If any member of the staff is adamantly opposed to the decision of the panel they may choose to ask that the dog/cat be reviewed again by the panel or the dog/cat be provided with additional time. Further oppositions are to be presented to the Director or their designee for review. Should time or space be a deciding factor in euthanasia recommendations, the Director or their designee must be consulted first.

There may be times when another suitable person is called in to render their own personal, professional opinion. The person may be a supervisor or above from within the organization or a person of equal qualifications from a local humane society or equivalent. This person should be considered an expert in their field and will be asked to provide an independent review of the animal. Any recommendations made by the independent reviewer will be strongly considered when determining the outcome of the animal.

VERIFICATION BEFORE EUTHANASIA (VERIFIER)

Before euthanasia of an animal is approved, a separate staff member (Verifier) will review the animal management database. The Verifier must concur that all of the necessary information is entered including; medical information is entered on the treatment screen for medical related euthanasia, and behavioral information is entered on behavioral memos. The information entered as referenced should also confirm the reason for euthanasia. Missing or mismatched information will halt the review and the Verifier will reject the panel's recommendation and notify the panel to re-review.

The Verifier will also confirm the animal is not on stray wait, all microchip leads have been followed if a microchip is found, there is not an adoption deposit, and no other hold is present to indicate another available outcome other than euthanasia. Pending holds, and microchips less than fully traced, will halt the review, and the Verifier will reject the panel's recommendation and notify the panel to re-review. If there is a hold, the hold must be removed by the person or group that created the hold and must include a memo stating the reason the hold was removed.

To ensure segregation of roles, the Verifier shall not be involved in the panel decision. The only information the Verifier may enter related to the decision is the final memo indicating the review is complete and the euthanasia recommendation is verified. Only when there is a panel approved Euthanasia Form, the form has been uploaded by the Verifier to the animal management database and the verification memo has been

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entered into animal management software by the Verifier, may an animal be euthanized outside of immediate need circumstances listed in the Immediate Euthanasia section of this document.

IMMEDIATE EUTHANASIA

There may be emergencies and situations when an animal is subject to extreme suffering if euthanasia is delayed. In these situations, staff trained to perform humane euthanasia in the field are to first seek guidance from the County Veterinarian, or contract Relief Veterinarian. If after hours, and no one listed or a Field Supervisor can not be consulted, the field staff must use their best judgement for the animal. In these cases, a post euthanasia justification is required. The form is to be completed by the person authorizing the immediate euthanasia and is to be uploaded to the designed folder on the G-drive.

There may be other situations where immediate euthanasia is deemed necessary. These situations include; Owner Requested Euthanasia for medical reasons, severe overnight medical decline found the next day, animals presented suffering from severe medical conditions, Zoonotic diseases defined by the County Veterinarians, severe injuries with suffering present during admitting to the shelter or in the field, severe injuries with suffering resulting from an extreme dog fight, an owner surrendered pet with severe medical with suffering or severe person aggressive behavioral issues that place staff in danger, or animals too young to feed themselves (1 pound or less) when a foster or rescue is not available by the end of the day. In these situations, staff trained to perform humane euthanasia are to first seek guidance from the County Veterinarian or contract Relief Veterinarian. If no one listed can be consulted, a Kennel Supervisor, Admitting Supervisor, or Clinic Supervisor must be consulted and is to use their best judgement for the animal. In these cases, a post euthanasia justification is required. The form is to be completed by the person authorizing the immediate euthanasia and is to be uploaded to the designed folder on the G-drive.

All situations resulting in immediate euthanasia must have an immediate euthanasia justification (justification) completed for each animal. Twice per month, when the majority of the panel sections are present, the immediate euthanasia justification forms will be reviewed to determine if proper application of these procedures are followed and to determine if the euthanasia is justified. This review will include verification of the information entered into the animal management database. To ensure segregation of roles in cases where a Section Supervisor authorized the immediate euthanasia, that Section Supervisor will not participate in the review of the specific euthanasia. For the purposes of this post euthanasia review, the Director's management designee will also participate in this review. If the panel agrees the immediate euthanasia was justified, the panel notes their agreed upon decision on the form and the Kennel Animal Care Supervisor uploads this form to the animal management database. If the panel finds either the procedures were not followed or the euthanasia was not justified, the Director's management designee will take over the review to completion.

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DOCUMENTATION

Every kennel record of every animal dispositioned should reflect the reason for euthanasia along with notes articulating the reason. Additionally, the date, time, weight, dosage of sedative and dosage of sodium pentobarbital should be entered into the animal management database. A treatment record should be created and the medication type, quantity in CCs and bottle number should be recorded for every animal euthanized requiring these drugs. Please refer to the data entry protocol for dispositioning animals for more details.