

MIAMI-DADE COUNTY OFFICE OF THE INSPECTOR GENERAL
FINAL REPORT
OIG Review of ASD's Shelter Operations

I. INTRODUCTION

Stray, lost, and abandoned pets present a challenge to communities across the country. The Miami-Dade County Animal Services Department (ASD) is the agency dedicated to dealing with the demands of sheltering and caring for the welfare of Miami-Dade County's animals.¹ ASD's stated goal is to reunite lost pets with their owners, find life-long homes for as many animals as possible, and provide proper care during their stay. Each year in Miami-Dade County approximately 28,000 to 35,000 animals enter the County's animal shelter.

The Miami-Dade County Office of the Inspector General (OIG) has received many complaints concerning ASD and its management and care of the animals at the shelter. The complainants ranged from former ASD employees and volunteers to individual pet owners and animal rights advocates. The allegations ranged from animal abuse and corrupt management to incompetence and inefficiency. As a result of the varied allegations, the OIG conducted a review of ASD and its shelter operations. The OIG's review spanned the range of shelter operations related to the intake, care and release of animals, recordkeeping, procedures, and security of the facility. During the course of the review, additional complaints were received by the OIG. The scope and breadth of the review was adjusted numerous times in order to ensure that the OIG examined as many, as possible, of the concerns brought to our attention.

II. EXECUTIVE SUMMARY

The task of sheltering and caring for the County's stray, lost, and abandoned animals is complex. ASD must balance the needs and welfare of the animals in its care against the limitations of space and funding. The sheer volume of animals handled by ASD on a yearly basis is staggering. ASD has made some great strides in recent years increasing positive outcomes, such as adoptions, while reducing the number of negative outcomes, such as euthanasia, for the animals in its care. These efforts have been implemented as part of ASD's move towards becoming a "No-Kill" shelter, which is defined as a shelter having a 90 percent rate, or better, of saved animals.²

Yet, in spite of ASD's successes, the OIG received complaints from individuals and animal advocates. Many of the complainants expressed their belief that the shelter's need to report the number of saved animals results in manipulation or falsification of records in order to meet the No-Kill goal. The OIG

¹ ASD mainly provides services to dogs and cats. Although ASD also takes in other species, ASD will find appropriate shelters or agencies to handle the care of those animals. For purposes of this report any references to ASD's care of "animals" will denote the care of dogs and cats.

² The goal rate was developed by specific No-Kill movement programs throughout the U.S. that advocate for alternatives to animal shelter euthanasia.

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also received complaints alleging intentional mistreatment of animals. The OIG's review focused on determining the validity of the complaints regarding falsification of records and the complainants' concerns about the security and welfare of the animals. The OIG also assessed ASD's practices and procedures in operating the shelter.

The OIG's review did not find any intentional mistreatment of animals. Neither were the allegations regarding intentional falsification of records to enhance the shelter's reported rate of animals saved substantiated.

This report examines eight specific areas based on the allegations received. In conjunction with investigating specific complaints, the report details observations and findings made by the OIG during the course of the review. The specific areas reviewed are:

- A. Animal Security & Safety
- B. Animal Welfare
- C. Save Rate
- D. Chameleon Record Keeping³
- E. Records Reconciliation
- F. Transfers to Rescue Organizations
- G. Security of Facilities & Controlled Substances
- H. ASD Staffing

Specific case examples are used throughout the report to discuss the issues found and the allegations reviewed. At the conclusion of each section, the OIG provides specific recommendations to address the OIG observations with the objective of improving the shelter's operations.

In Section A, the OIG evaluated the security and safety of animals at the kennel based on allegations that animals escape or are missing and that ASD staff are intentionally arranging animal fights. The OIG's review found incidents of escaped and missing animals to be low, and despite allegations to the contrary, the OIG found no evidence that ASD staff intentionally arranged animal fights. Although our primary objectives were the allegations, the OIG's review looked closely at the procedures in place to ensure the security and safety of the animals. Based on those observations, the OIG found some areas that could be improved. For example, the OIG found no specific written policy in place detailing the process of performing the daily physical inventory of the animals. The OIG also found staff lapses in following [REDACTED] and a lack of review, or investigation, of incidents involving animal fights resulting in serious injuries.

³ Chameleon is ASD's internal electronic animal case management system.

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Also reviewed, as noted in Section B of the report, was ASD's provision of adequate exercise, enrichment, medical treatment and a safe environment for the shelter's animals. No evidence was found regarding allegations of lack of treatment or improper medical treatment, nor of improper mixtures or administration of drugs. However, ASD's system of tracking and management of exercise for the animals at the shelter was found to be inadequately managed and lacking consistency. The OIG is aware that ASD is taking steps to enhance the enrichment and exercise provided to animals at its new Doral facility. These steps along with the OIG's recommendations, if implemented, will greatly enhance the welfare of the sheltered animals.

Section C of the report sets forth the OIG's review of allegations that ASD manipulates records in order to show a favorable Save Rate. The OIG did not find, as suggested by the allegations, that ASD intentionally manipulated information in order to positively affect the Save Rate. Nor was it found that employees were inappropriately rewarded and encouraged to promote incorrect data and falsify statistics, nor that ASD has a quota system designed to enhance the Save Rate. While the OIG did not find a problem with the Save Rate, we are making the recommendation that ASD report the raw numbers and disclose any figures excluded in its calculation of the Save Rate.

To review the Save Rate calculations it was necessary to review ASD's record keeping and record gathering system, Chameleon. ASD's reconciliation of records was also examined. The recommendations that follow these two sections in the report (see Sections D and E) are geared to making changes that allow for a uniform system to record and correct errors. Although the total number of errors reviewed by the OIG was nominal and did not affect the Save Rate percentage reported, such errors should be avoided and corrected. More importantly, the system should have a uniform methodology for correcting errors. The OIG provided recommendations to ensure that records are reconciled to ensure that the data is accurate and that errors can be corrected or explained.

Next, in Section F, the OIG reviewed ASD's tracking of animals transferred to rescue organizations. The OIG found that ASD has not been consistently tracking the disposition of animals transferred to rescue organizations. Although ASD has recently re-written the agreements with rescue organizations, with a stated goal of improved monitoring, the OIG believes the new method is inadequate, and we provide a recommendation to improve ASD's oversight of the rescue organizations.

Regarding the physical security of the facilities and the controlled substances, Section G of the report, the OIG found some issues in the Medley and Doral facilities. The recommendations that follow this section are meant to enhance security. The last section of the report, Section H, addresses staffing

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issues based on the independent observations of OIG investigators during the review. In reviewing staffing issues, the OIG is concerned with the ability of ASD to operate two facilities with limited staff resources, and ensure the safety, care, and attention required to be given to sheltered animals.

Prior to the presentation of the issues summarized above, a background section sets forth an overview of ASD. A brief history of ASD's establishment, its mission, and recent accomplishments; and an overview of facilities, funding, and operating sections is provided for informational purposes. A brief description of the shelter's intake and tracking system is also discussed in order to put in context much of the information in this report.

III. ASD RESPONSE & OIG REJOINER

This report, as a draft, was provided to ASD for its discretionary written response. ASD's response is attached, in its entirety, as Appendix A. In its response ASD states it agrees with 15 of the 18 recommendations made by the OIG.⁴ While ASD has agreed to implement the overwhelming majority of the OIG's recommendations, its response to the OIG's review is generally a defensive one. ASD's executive team, throughout this review process, has accepted the OIG's findings into allegations that were found to be without merit, but has not, we feel, been as receptive to our broader review of departmental policies and procedures.

In its response ASD states that "the recommendations provided by the OIG are largely acceptable..." while asserting that the "supporting findings and observations are without merit." The OIG notes the incongruity of ASD's response; agreeing to the recommendations while sharply disagreeing with the findings and conclusions. Given that discrepancy, the OIG agreed to meet with ASD to review the draft and response. ASD provided the OIG with additional materials and information to consider prior to finalizing the report.

The OIG has taken the time necessary to review all of ASD's submissions. In addition, the OIG did another review of data, records, and other materials to ensure a complete and thorough assessment subsequent to ASD's additional submissions.⁵ This post-draft review resulted in the OIG's additional requests to ITD for ASD's electronic records. Once received, the OIG had to conduct a thorough review of those records and scrutinize previous records in light of the new information. This final report has been restructured for clarity. The report has been reorganized in the following manner:

⁴ A summary of ASD's response to the recommendations and the OIG's rejoinder, if any, can be found following each recommendation.

⁵ Appendix B contains materials submitted to the OIG on February 3, 2017.

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The final report is divided into eight specific areas examined by the OIG based on the allegations received and our independent observations. The draft report originally contained seven areas of review. An eighth section was created by dividing Section C - "Save Rate" into two sections, adding Section D - "Chameleon Record Keeping." In reviewing ASD's response and materials, the OIG believes that separating these issues helps to clearly distinguish the observations made regarding allegations of intentional falsification of the Save Rate and the OIG's observations regarding record keeping system errors. In carefully reviewing ASD's response and the concerns expressed subsequent to the response, this final report clarifies that the record entry errors reviewed did not affect the Save Rate percentage reported. While the draft correctly stated that errors resulted in positive and negative outcomes, which can affect the Save Rate calculations, the Save Rate percentage as reported by ASD was not affected. The errors found, that are now discussed in Section D, did not affect the percentage reported. Therefore, in an effort to be clear and avoid misinterpretations of our findings, the final report rephrased and clarified those observations and conclusions.

Throughout the report sections were reorganized in order to provide greater clarity. For example, some information previously included under "ASD Staffing," now Section H, was moved up to Section C - Save Rate, because it pertained directly to allegations of manipulation of the Save Rate. Also, Section A - Animal Security and Safety, was divided into two subsections to emphasize the review and finding of specific allegations and the independent observations and findings made by the OIG. In reorganizing this section, the OIG added sources of information and explanations, including information provided by ASD in its response. The additions are meant to clarify the OIG's findings and conclusions. The OIG's observations of ASD's procedures still supports the draft report's conclusion that ASD should be ensuring that any inventory with a missing animal is updated and reconciled by the end of the day. That conclusion was the basis of the OIG's recommendation, with which ASD agrees.

The OIG did not, as requested by ASD in its response, delete any of the Case Examples in Section A. However, due to the reorganization of the section, the Case Examples were renumbered.⁶ ASD, as evident from its response, found the use of certain Case Examples objectionable. Case Example #2,⁷ is described as "...an example without merit regarding security findings and should be removed from the draft report." ASD expressed the following concerns: "It is not known if the aggressor dog attacked Anastasha in the kennel, if both dogs

⁶ Exhibits were also renumbered. Some exhibits were removed and others added due to the reorganization of material in the report.

⁷ Case Example #1 in the draft report. In this final report it has been renumbered as Case Example #2.

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escaped from their kennels or if the individual filming Anastasha caused the incident.” ASD’s concerns highlight the OIG’s conclusion that ASD should immediately review and document incidents involving serious injuries to animals.⁸ The OIG noted ASD’s concerns, which included the source of the information, and made determinations based on the available evidence. The OIG did not remove Case Examples because many of them are based on complaints received by the OIG. The investigation of those allegations and our conclusions remain in the report.

Some of the recommendations in this final report have been renumbered to conform to the reorganization of sections of the report. Some information in the draft report provided as background that did not affect the substance of the review, was deleted for brevity. Also, the draft report commented on what the OIG believed to be inconsistencies found in ASD public presentations or publications of statistics. ASD has provided clarification on those issues. For example, included in the draft report was an erroneous reference that ASD incorrectly reported a Save Rate percentage to the BCC. While the OIG relied on the Board’s minutes for its conclusion in the draft report, ASD’s response clarifies that the percentage was reported accurately. Although the minutes of the BCC meeting are in line with the OIG’s conclusion, a tape of the meeting confirmed ASD’s response. Because these issues were extraneous to the allegations reviewed, and the OIG has verified ASD’s response, the issues have not been included in the final report. Background information on the Asilomar Accords, and additional background information on the various divisions within ASD and their specific duties, were deleted for brevity. Additionally, the draft report contained information relating to security systems, which is confidential pursuant to Florida Statutes § 281.301 and §119.071(3)(a). All such information has been redacted in both this final report and ASD’s materials in the appendices.

Based on ASD’s response and subsequent presentation, which provided information not previously discussed with the OIG, the OIG reinitiated a comprehensive review of our original findings and conclusions. The review included requesting additional reports from Miami-Dade County’s Information Technology Department (ITD). During the course of the original review, it was the OIG’s understanding based on interviews, conversations, and questions to ASD management and staff that there were system limitations to Chameleon. For example, the OIG recommended during the course of the review, and in the draft of this report, that ASD add terms like “void, null, error, etc.” to the drop down menu of the outcome field in the Kennel screen whenever erroneous intake

⁸ The draft report observations and recommendation focused on the fact that ASD does not automatically conduct a review after each incident resulting in injuries. The final has been modified to recommend a review and documentation of incidents involving serious injuries.

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entries occur. Although the number of erroneous entries reviewed by the OIG have not affected the Save Rate percentage calculation, this principle provides for transparency and accuracy in record keeping.

ASD repeatedly stated to the OIG, and included in its response to the draft, that Chameleon had system limitations. In fact, during the initial review, ASD requested the OIG's assistance in procuring a case management system that would not have such limitations. When the OIG embarked on its second review of ASD records, after ASD submitted its response, the OIG discovered the recommendation to add "void" had already been implemented by ASD. The OIG's post-draft request of ITD to run reports captured more recent data than previously reviewed. Those reports revealed that ASD added the "void" option contemporaneously with the OIG investigators' discussions about the issue. ASD did not advise the OIG investigators at the time, nor in its response to the draft report that it had already implemented the recommendation. The draft report's recommendation to include "void, null, error, etc." as an outcome field option has been modified to address training and use of those options.

The OIG's post-draft review resulted in the discovery that ASD management has the ability to correct fields in the Kennel screen from which Save Rate data is extracted. It had been the OIG's understanding, based on the information provided by ASD, that changes to those fields could not be made.⁹ The subsequent reports, requested and obtained from ITD, revealed that ASD had the ability to make changes to those fields since at least 2011. The lapse in communication with the OIG resulted in recommendations in the draft report to address Chameleon system limitations instead of the revised recommendations geared towards identifying and correcting errors. For example, the OIG was informed, prior to the draft report and during the post-draft review, that "ASD policy and Chameleon procedures do not allow for the drug dosage [entered in Chameleon] to be modified." Case Example #8 contains an example of a drug dosage entered in Chameleon that was not corrected in the treatment screen upon cancellation of the euthanasia procedure. Based on the OIG's understanding of the system limitations the OIG recommended that ASD explore modifications, updates, and upgrades to Chameleon, including drop down menus in all screens that contain entries that would indicate errors. The OIG's post-draft review found that ASD can make corrections to the dosage entered in Chameleon's Kennel screen. According to ITD, a representative of HLP, Inc. the Chameleon software provider, advised that the treatment screen dosage can also be corrected.¹⁰ ASD asserts that the ability to correct the dosage was not

⁹ Throughout the review, the OIG was given read-only access to Chameleon, therefore the OIG did not have the ability to test the Chameleon system's functionality to independently gauge how corrections could be entered.

¹⁰ The OIG does not have an example of a change to the dosage amount in the treatment screen.

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known until the OIG began to question the inability to correct errors. Based on the post-draft findings, the OIG's conclusion in the draft report that Chameleon limitations prevent the correction of errors has been changed in this final report.

The OIG met with ASD management to discuss the new findings and determine ASD's methodology in correcting errors. ASD management advised the OIG that ASD is now running additional audit reports to capture errors and make corrections. In this final report, the discussion of input errors and corrections has been placed in its own section, Section D, titled Chameleon Record Keeping. The information has been pared down and the recommendations modified now that it is clear that errors can be corrected by ASD.

In the final analysis, ASD has made many improvements in its services and facilities. The OIG did not find intentional mistreatment of animals, or falsification of the records affecting the Save Rate percentage reported. However, this review was uniquely challenging. There was resistance to critical observations, and some reticence by ASD in timely providing complete and updated information. These conditions, compounded with the number and variety of the complaints received, adversely impacted the amount of time it took to complete this review.

IV. OIG JURISDICTIONAL AUTHORITY

In accordance with Section 2-1076 of the Code of Miami-Dade County, the Inspector General has the authority to make investigations of County affairs; audit, inspect and review past, present and proposed County programs, accounts, records, contracts and transactions; conduct reviews, audits, inspections, and investigations of County departments, offices, agencies, and Boards; and require reports from County officials and employees, including the Mayor, regarding any matter within the jurisdiction of the Inspector General.

V. OBJECTIVES, SCOPE, & REVIEW METHODOLOGY

The OIG review sought to determine the validity of any complaints, assess ASD's performance, and identify areas to be corrected and improved. To accomplish those objectives, the OIG engaged in a process of records review, interviews, and consultation of the literature and experts in the field of animal shelter care. The OIG evaluated ASD's operational practices, including but not limited to, the procedures and controls designed to ensure the security, behavioral, and physical welfare of the animals impounded at the shelter. The OIG also assessed the procedures, practices, and systems in place to document the intake, outcome, and care received by animals impounded at the shelter and those using ASD clinic services.

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The OIG researched and reviewed various standards and guidelines developed by experts in the field of shelter animal welfare, in order to measure ASD's performance. Particularly, the OIG reviewed the Association of Shelter Veterinarian's published *Guidelines for Standards of Care in Animal Shelters*. During this assessment, the OIG conducted numerous interviews with key ASD staff members and external sources involved in the animal shelter and care process. The OIG also reviewed relevant Florida statutes; Miami-Dade County ordinances and resolutions; and records from both the Florida Department of Health, and the Florida Department of Business and Professional Regulation.

The OIG interviewed ASD staff, including but not limited to, the Director, Division Chiefs from five sections within ASD, Veterinarians, Veterinary Technicians, Animal Care Specialists, Animal Control Specialists, and other shelter staff. In addition, the OIG interviewed present and former ASD volunteers as well as ASD consultants. Experts and representatives from the American Society for the Prevention of Cruelty to Animals (ASPCA), the University of Florida and other organizations within the animal shelter and care field were also consulted and interviewed. The OIG also interviewed many of the individuals who made complaints against ASD, and Miami-Dade County residents who have used ASD's services.

Where complaints identified specific animals, the OIG reviewed the available records and videos, interviewed staff, and incorporated the findings in this report as specific Case Examples. Other case examples cited in this report were independently identified by the OIG during the course of the review.

The OIG received and analyzed records and data provided by ASD staff dating from 2009 to the present. The records reviewed pertained to the intake and outcome of animals impounded and the services provided to animals through the clinic. In addition, records and reports were reviewed and analyzed with regard to the behavioral, physical, and medical aspects of animal care at the shelter. The OIG also reviewed the supporting documentation pertaining to figures reported by ASD to the Miami-Dade Board of County Commissioners (BCC), in public presentations and departmental literature. The records maintained within ASD's internal animal tracking system, known as Chameleon, were reviewed and compared to other internal logs and records. The OIG requested and reviewed various reports derived from data maintained in Chameleon and prepared by ITD. In addition, the OIG sampled a number of animal tracking records. Lastly and not insignificantly, the OIG conducted numerous visits to the ASD Medley shelter facility, as well as the new facility in Doral.

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This review was conducted in accordance with the *Principles and Standards for Offices of Inspector General* as promulgated by the Association of Inspectors General.

VI. BACKGROUND

A. ASD ESTABLISHMENT, MISSION, & RECENT ACCOMPLISHMENTS

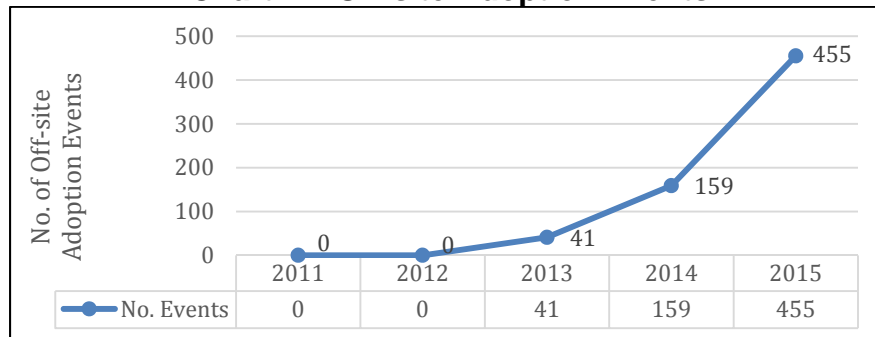
ASD was originally established as part of the Dade County Public Safety Department. It later became a part of the Public Works Department and was designated as the Animal Care and Control Division. In 2001, the Miami-Dade Police Department took over the responsibilities of managing the Division and performing all of the animal control functions. In October 2005, Animal Services became its own Department, charged with all facets of care to the County's homeless animal population and animal control functions.

The County, through various resolutions, has proclaimed that saving animals is in the public interest and that the needless tragedy of killing animals should be avoided if animals can be placed in suitable homes, rescue groups, or sheltering agencies. To that end, in July 2012, the BCC adopted two resolutions moving the County towards having a No-Kill shelter. Resolution No. R-583 -12, directed the Mayor to develop a program for ASD with the goal of becoming a No-Kill shelter. Resolution No. R-647-12, placed a non-binding ballot question on the general election ballot asking voters if they would support an increase in the countywide general fund millage by 0.1079 mills to fund improved animal services programs in the County. The voters were overwhelmingly in favor of increasing the millage rate to fund improved ASD programs. In June 2013, through Resolution R-476-13, the BCC accepted ASD's report outlining a plan of various programs to attain the goal of becoming a No-Kill shelter. From 2013 through 2015, the County (through its annual adopted budget) increased the amount of funding allocated to ASD from the general fund – but did not increase the millage rate – for the implementation of new programs in a continuing effort to become a No-Kill shelter.

ASD has implemented up to 25 programs to ensure that the animals at the shelter find permanent homes. Some of these programs include a comprehensive adoption program, a foster program, and a rescue group program. In an attempt to keep animals from entering or staying in the shelter, ASD put in place a pet retention counselor. ASD also implemented off-site adoption events starting in 2012. ASD has entered into an agreement with Petco Animal Supplies, Inc. to host adoptions at Petco stores. These programs are similar to programs used by animal shelters located throughout the United States. Off-site adoption events have increased from zero in 2011 to over 400 events in 2015. The chart below depicts the increase in off-site adoption events.

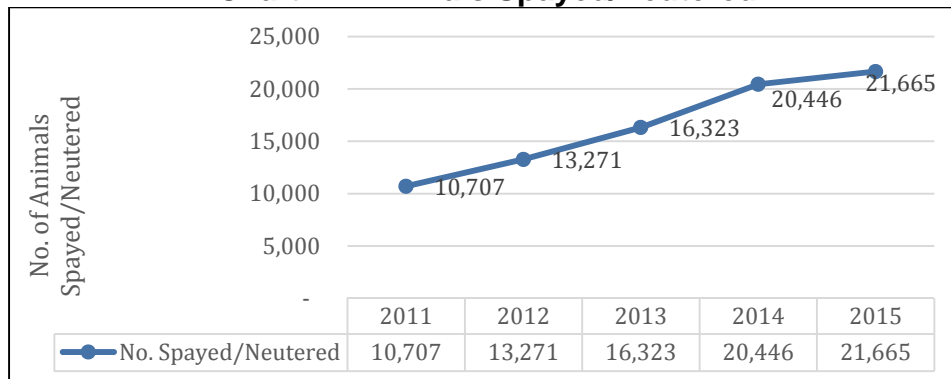
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Chart 1 – Off-site Adoption Events



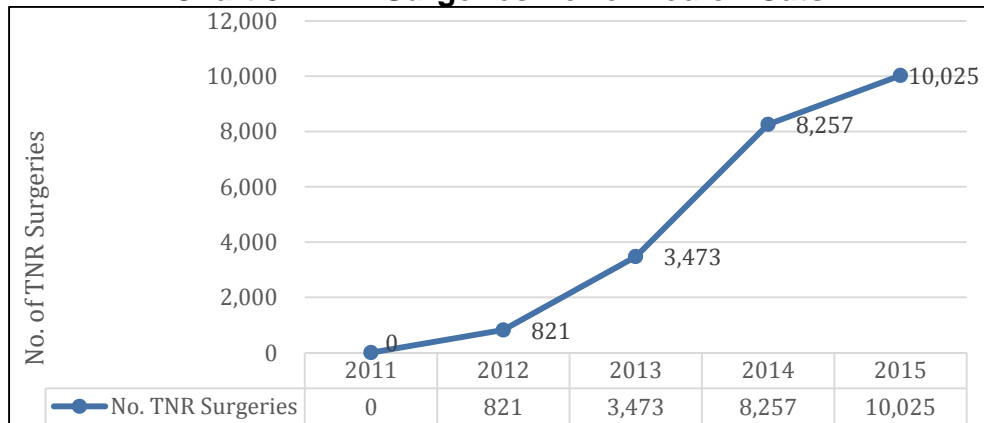
In addition, ASD has implemented programs to control the propagation of stray and unwanted animals such as a Trap Neuter Return (TNR) for cats, spay and neuter services, and public relations events designed to educate the community. The number of animals spayed and neutered has more than doubled from around 10,000 in 2011, to over 21,000 in 2015. The number of cats processed by ASD through the TNR program, which attempts to reduce the stray cat population within the County, has increased from approximately 1,000 in 2012 to over 10,000 in 2015. Chart 2 depicts the progress of ASD's spay and neuter program for both dogs and cats and Chart 3 depicts the progress of the TNR program for feral cats.

Chart 2 – Animals Spayed/Neutered



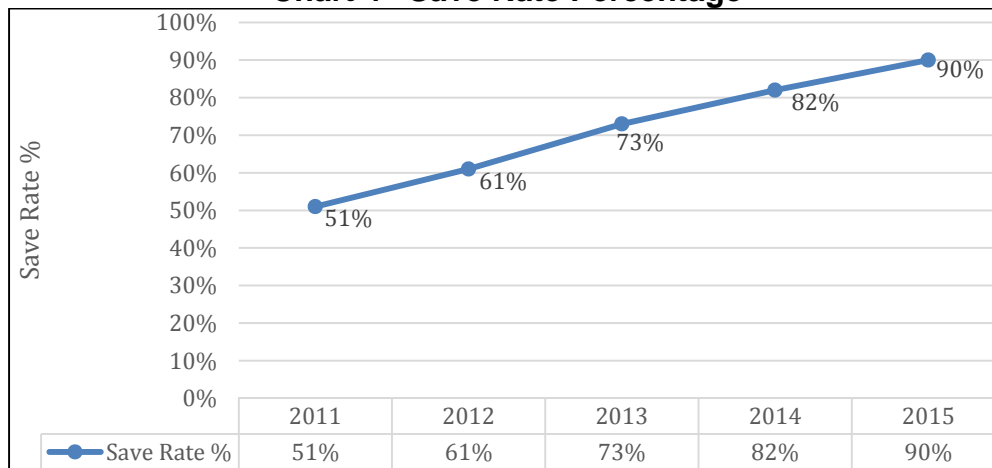
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Chart 3 –TNR Surgeries Performed on Cats



These efforts have made it possible for ASD to make accomplishments towards becoming a No-Kill shelter by increasing the combined Save Rate for both dogs and cats from 51 percent in 2011 to a reported 90 percent for calendar year 2015. See Chart 4 below.

Chart 4 –Save Rate Percentage



B. ASD FACILITIES, FUNDING, & OPERATING SECTIONS

The current ASD shelter, now known as the Pet Adoption and Protection Center, opened its doors on Monday, June 13, 2016. The new facility, located in Doral, is a state of the art facility with a 430 kennel and cage count. The old facility, located in Medley, was constructed in 1969 and has a 293 kennel and cage count. Efforts were made to update the Medley facility through additions and design upgrades. The facility, however, could not handle the current volume of animals in need of shelter in Miami-Dade County. Although ASD has officially

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moved its operations to the Doral facility, the Medley facility is still in use to shelter a number of animals.

ASD is funded through the County's General Operating Fund and through dog license sales, shelter fees, enforcement fines, grants, and donations. ASD's budget has increased from approximately \$10 million in 2011 to \$17.6 million in 2016. The additional funds that have been added to ASD's budget, over time, have been primarily derived from the County's General Operating Fund and not through an increase in the countywide millage rate, as proposed in the non-binding straw ballot favored by voters in 2012.

For Fiscal Year 2015-2016, ASD had a permanent staff of 152. The Department is divided into five operational sections: 1) Shelter Operations and Enforcement, 2) Veterinary Services, 3) Shelter Services and Live Release Program, 4) Administrative Services and Licensing, and 5) Outreach and Development. All sections are supervised by a Section Chief and all chiefs report to the Department Director.

ASD also has a volunteer program. Volunteers are responsible for helping the shelter care for the animals by cleaning kennels, walking, bathing, feeding, and moving animals around the shelter to and from the clinic and to meet potential adoptive families. The volunteers report to a Volunteer Coordinator who is a full-time employee in the Shelter Services and Live Release Program section.

C. SHELTER INTAKE & TRACKING SYSTEM

Animals come into the care of ASD in a variety of ways. Free roaming, stray or lost animals are picked up and brought into the shelter by Animal Control Specialists or private individuals. Animals are also brought to the shelter as a result of enforcement actions. For example, police and ASD investigations may result in animals being removed from abusive or neglectful owners. Animals are also frequently surrendered by their owners for a variety of reasons such as owner infirmity or inability to care for their pet. On an average day there are approximately 300 dogs and 150 cats in the shelter.¹¹

ASD uses an integrated animal control and sheltering software system called Chameleon. Each animal entering the shelter is given a computer generated, unique identification number, known as the Animal ID Number. The number links all information about the animal to its record in Chameleon, including any prior stays at the shelter.

¹¹ This average is based on a sampling of ASD kennel inventory figures conducted by OIG investigators from five nonconsecutive days.

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For ASD, tasked with the goal to achieve a No-Kill shelter, the accuracy of its records is essential in determining what is referred to as the "Save Rate" on a yearly basis. The Save Rate is the number of animals that are taken into the shelter and are "saved" or released alive. ASD keeps track of the intake of animals and the eventual outcome of each animal in the shelter.

For this review, the OIG requested ASD's records showing live intake statistics for dogs and cats for the calendar years 2009 through 2015. The number of animals impounded is crucial in assessing the "Save Rate" of the shelter and the capacity to safely and humanely care for the animals. The yearly intake rates reported by ASD are:

Table 1: ASD Shelter Yearly Cat & Dog Intake Rates – 2009 to 2015

Year	2009	2010	2011	2012	2013	2014	2015
Intake	35,513	33,711	28,976	29,531	28,240	30,499	29,095

VII. OIG REVIEW: OBSERVATIONS, FINDINGS, & RECOMMENDATIONS

The observations, findings, and recommendations that follow are based on the OIG's review of eight specific areas:

- A. Animal Security & Safety
- B. Animal Welfare
- C. Save Rate
- D. Chameleon Record Keeping
- E. Records Reconciliation
- F. Transfers to Rescue Organizations
- G. Security of Facilities & Controlled Substances
- H. ASD Staffing

A. ANIMAL SECURITY & SAFETY

The OIG reviewed the conditions at the shelter that ensure the security and safety of the animals. Although the review was based primarily on the practices at the Medley facility, the OIG has made repeated visits to the Doral facility since the June opening. The observations, findings and recommendations are applicable to either facility.

1. Review of allegations affecting security and safety

The OIG evaluated kennel security due to allegations that animals escaped and are missing from their kennels while at the ASD Medley shelter.

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The OIG examined ASD's procedures, Chameleon reports, inventory records, and conducted interviews to determine how many escapes occur and how many animals are reported as missing per year. ASD's Shelter Program Manager provided the OIG with the definitions of "escaped" and "missing" as used by ASD for its statistical reporting. "Escapes" are defined as animals that manage to leave the shelter. "Missing" animals are defined as dogs or cats which ASD cannot locate in its kennel at the time a physical inventory is performed, but which have not been confirmed as escaped. It is possible for daily physical inventory counts to have missing animals, due to the movement of an animal at the time of the count. However, ASD should be ensuring that any inventory with a missing animal is updated and reconciled by the end of the day. The OIG found that ASD records show an average of 27 animals reported as escaped and 38 animals reported as missing each year. Relative to the yearly intake of animals at the shelter, the yearly numbers of both escaped and missing animals are very low. The following tables detail the findings.

Table 2a: Escaped animals reported in Chameleon 2009 to 2015

Outcome Type	2009	2010	2011	2012	2013	2014	2015	Average
Escaped	28	23	11	30	31	36	28	27

Table 2b: Missing animals reported in Chameleon 2009 to 2015

Outcome Type	2009	2010	2011	2012	2013	2014	2015	Average
Missing	37	27	60	40	39	40	22	38

The OIG notes that in reporting yearly statistics other shelters in Florida report animals as "lost in care/missing" and do not separate the data into the two categories of "missing" and "escaped." Refining categories, as ASD does, can provide the public with greater transparency and understanding of the numbers reported. However, given ASD's definition of missing animals, "dogs or cats which ASD cannot locate in their kennel at the time a physical inventory is performed, but which have not been confirmed as escaped," the number listed as missing in the yearly statistics should be minimal or nonexistent. Only those animals that have not been located or confirmed escaped at the time of reporting should be listed as missing.¹² Throughout the year, prior to reporting, ASD should be reconciling records to account for animal movement within the shelter and reclassify any confirmed escapes.

¹² As an example of "missing" ASD's Shelter Program Manager included animals that may have been stolen. The OIG did not review any records or data of stolen animals. Therefore, the OIG cannot determine the breakdown of the totals reported as missing in the charts above.

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The OIG learned from interviews of staff and volunteers that when animals are moved from one kennel to another, ASD staff are not consistently tracking and inputting the movement into Chameleon. Failure to update kennel changes can result in animals reported as missing during the daily physical inventory. The OIG found that ASD does not have a specific written procedure addressing the topic of the physical inventory of animals at the shelter. While the Canine Sanitation procedure, the inventory logs, and the individual room assignment sheets serve to remind staff that inventories should be conducted, there is no specific written procedure designed to guide staff on steps to take to locate, document, and reconcile “missing” or “escaped” animals. **CASE EXAMPLE #1** (PACO) serves as an example of a situation where the guidance of a specific procedure instructing staff when and how to document an escape would have been beneficial. Another observation made from **CASE EXAMPLE #1** is that animals are not always photographed. The OIG understands that ASD cannot always photograph an animal at impound; the animal may be aggressive, injured, or stressed. Also, it is clear that photographing an animal inside a kennel or cage can diminish the animal's chances for adoption. Although such reasons are valid, photographs for internal purposes – not to be posted for adoption purposes, would enhance and improve the tracking of animals throughout the shelter.

The OIG also reviewed incidents of animal fights and injuries within the kennel based on an allegation that shelter staff intentionally created the situations that resulted in animal fights and injuries. An incident involving a dog named Anastasha, attached as **CASE EXAMPLE #2**, came to the attention of the OIG through a complaint alleging that ASD allows animals to fight causing injury or death to the animals. The OIG attempted to determine the number of animal fighting incidents and the procedures in place to prevent these events. The OIG conducted extensive interviews of current and former ASD staff and volunteers. Additionally, the OIG reviewed records from Chameleon, available video recordings¹³ of the shelter's kennels, operational procedures, and conducted unscheduled visits to review the conditions that could lead to animal fights and injuries at the shelter.

The OIG did not find any evidence that ASD staff are intentionally arranging animal fights. Also, contrary to the allegations received, the OIG's review involving the security and safety of animals found incidents of escaped and missing animals to be low.

¹³ [REDACTED]

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2. OIG observations on security and safety

Independent of the allegations, the OIG's review found some procedures that can be improved to increase the security and safety of the shelter. [REDACTED]

[REDACTED]

¹⁵.

Three unscheduled visits to the Medley facility, on November 12, 2015, December 7, 2015, and December 14, 2015, [REDACTED]. Exhibit 1 depicts pictures of [REDACTED] observed by OIG investigators in the West Wing of ASD after the 10:00 a.m. daily cleaning process was completed. An unscheduled visit on February 12, 2016, revealed [REDACTED]

[REDACTED] On an unscheduled visit on February 23, 2016, [REDACTED]

The OIG learned that two weeks after the Doral shelter opened, two dogs died due to [REDACTED]. The aggressor's cage was improperly latched and [REDACTED]. Had the ASD employee followed procedure and [REDACTED], the improper latching would have become evident and the incident avoided. This example is more fully described in **CASE EXAMPLE #5**.

A month after the incident described in **CASE EXAMPLE #5**, the OIG conducted an unscheduled visit to the Doral shelter on July 27, 2016. The OIG found [REDACTED]

[REDACTED] No Animal Care Specialists were present in the sections during the visit. Photos of the cages are attached as Exhibit 2. [REDACTED]

Another independent observation, during the course of the review was that ASD does not automatically conduct a review, or investigation, after each incident resulting in serious injuries. A review or investigation would include interviewing staff, reviewing available video, and documenting the incident in a report other than the medical notes. ASD staff acknowledged that they have no tracking system in place for injuries occurring inside the shelter. Only the

¹⁴ Kennels at the shelter are structures or enclosures that are fixed or stationary, and cages are structures or enclosures that can be moved from one area to another.

¹⁵ Fenced in areas of the facility are accessed through gates. References in the report to gates are to those access points and not the kennel or cage doors.

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animal's medical treatment record would contain notes describing the injuries. In contrast, ASD does have a summary report to track animals that are brought into the shelter injured, that is, they sustained the injuries prior to being impounded.

The OIG recognizes that in some cases animal fights and injuries cannot be avoided. ASD has advised the OIG that they have a system in place to identify aggressive animals and ensure that they are not co-housed with other animals or that they are moved. In spite of those efforts, animals do fight and as a result are injured. The OIG has learned from interviews with a professor of Shelter Medicine at the University of Florida, and review of the Guidelines for Standards of Care in Animal Shelters issued by the Association of Shelter Veterinarians, that dogs can become aggressive due to several factors, including but not limited to, control of food and toys, fear, territory, and length of stay in the kennel.¹⁶ Animals at the Medley shelter were co-housed in kennels due to space limitations. The Doral facility, while bigger, may also face space limitations. The lack of reports of serious injuries or a central record of incidents leading to serious injuries,¹⁷ made it too difficult and time consuming for the OIG to determine how many serious injuries occur due to co-housing animals.

The OIG was able to find some examples of incidents of injuries, including death, as a result of animals fighting. Identifying the incidents of fights was not an easy task as there is no report or keyword search of Chameleon to isolate those incidents.

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The specific incidents of animal aggression and injuries reviewed by the OIG were due to animals getting out of unlocked kennels or chewing through leashes. Nylon leashes are used at the shelter to tether dogs outside the kennels during cleaning or to transport animals to another location within the shelter. Unless carefully supervised, tethered animals can escape or cause injuries to others. Loose dogs pose a serious risk to the safety of animals, ASD personnel, and members of the public.¹⁹

¹⁶ The OIG has learned that the average stay at the shelter is approximately 8 days, however, some animals have stays of over 100 days.

¹⁷ The OIG is cognizant of the burden it would place on ASD to document every minor incident that does not result in serious or significant injury to an animal.

¹⁸

¹⁹ Members of the public are allowed to walk through some of the kennel areas when adopting animals.

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The OIG has made several visits to the Doral shelter since the mid-June opening. The OIG is aware that ASD consulted with several professionals in the animal sheltering industry in designing the Doral facility. The Doral shelter has many visual barriers to minimize the stress and aggression of kennelled dogs. The kennels are designed with a pin lock mechanism on the latches that is an improvement from the latches in the Medley shelter. The kennels also have fixed bars, unlike the Medley shelter's chain-link fence kennels that allowed animals to push under and get loose. The kennels are divided with a guillotine design allowing the easy and stress free movement of dogs during cleaning. In addition to kennels, the Doral shelter also has cages of varying sizes. Air conditioning and natural light add to the comfort and well-being of the animals. All these improvements should reduce the animals' stress levels, and improve safety.

These improvements, coupled with continuous training, documentation, following procedures, reviewing incidents and revising protocols, can only enhance the shelter. There is always a potential for animal fights in shelters. Reporting or documenting serious injury incidents can be used to aid management decisions, enhance personnel training and performance reviews, establish preventive measures, and respond to public inquiries.

CASE EXAMPLES #1 through **#5** are illustrative of the allegations and observations reviewed involving the security and safety of animals.

RECOMMENDATIONS ADDRESSING ANIMAL SECURITY & SAFETY

- 1) The OIG recommends that ASD reconcile missing animals by the end of the day. ASD should develop a formal written policy and procedure for the physical inventory of impounded animals. The procedure should contain, but not be limited to, processes describing:
 - a. time and frequency of inventories
 - b. how to document the presence or absence of animals
 - c. processes to locate missing animals including who to notify
 - d. processes to correct errors on the physical inventory
 - e. updating Chameleon records for each animal
 - f. photographing animals
 - g. breed information should be updated in all fields upon a correction of the classification

ASD Response and OIG rejoinder:

ASD agrees with the recommendation and states that a reconciliation of inventory is done twice daily and "...animals not identified are to be updated to reflect missing until resolved." While the OIG is pleased that ASD does a twice

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daily reconciliation, it should be noted that our recommendation is aimed at ensuring that there are no animals labeled as "missing" at the end of the day. ASD should strive to resolve any conflicts in the inventory by the end of the day by either determining the location or re-classifying as escaped. ASD also misapprehends the recommendation to develop a formal written policy and procedure for conducting physical inventory. ASD points to the actual physical inventories conducted, and to several other policies, which mention the physical inventory. It is recommended that ASD develop a stand-alone, specific policy, addressing inventory procedures.

- 2) The OIG recommends that ASD photograph all animals. Aggressive animals should be photographed inside their kennels/cages/glass enclosures, and the photographs should only be used for internal purposes, not for adoption purposes.

ASD Response and OIG rejoinder:

ASD disagrees with the recommendation because the photography of animals through cage bars, photographs displaying overt aggression, and photographs with injuries may be shocking or disturbing to viewers. ASD's response does not address the OIG's recommendation that photography of aggressive or fearful animals be taken for internal purposes only. However the OIG appreciates that ASD has indicated it will consult with industry professionals to identify best practices.

█ The OIG recommends that ASD enforce █ ASD should review existing security procedures and train or re-train all staff and volunteers █

ASD Response and OIG rejoinder:

ASD states in its response: "The Department agrees with this recommendation and is enforcing protocols

█

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- 4) The OIG recommends that ASD document all events affecting animals, whether they are fights resulting in serious injuries or escapes. Documentation should be through a field in Chameleon, similar to the Intake Condition field used to generate the Injured Animal Intake MDASD report. ASD should document these incidents immediately after the incident happens or is discovered.

ASD Response and OIG rejoinder:

ASD agrees with the recommendation and states that the "...recommendation references a practice currently in place, as described in this response." ASD's response describes a process to identify aggressive animals and ensure that they are not co-housed or are moved. Again, ASD misapprehends the OIG's recommendation. Reporting, documenting, and tracking serious injury incidents (and escapes), not merely changing a status field to indicate aggression, can be used by management to establish preventive measures, and assist in staff training.

■ The OIG recommends [REDACTED]

ASD Response and OIG rejoinder:

ASD does not indicate whether it agrees or disagrees with this recommendation. Instead ASD states, [REDACTED]

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B. ANIMAL WELFARE

ASD is not only tasked with creating a safe environment, but also with ensuring the health and providing for the behavioral well-being of the animals in its care. Based on the complaints received, the OIG reviewed concerns regarding ASD's provision of adequate exercise, enrichment, medical treatment and a safe environment for the shelter's animals.

According to the Association of Shelter Veterinarians' 2010 Guidelines for Standards of Care in Animal Shelters, providing a stress free, enriching environment, is critical in maintaining the safety of animals and staff and in transitioning the animals to a permanent home. The Guidelines state: "Ideally, recommendations to ensure physical and behavioral health and well-being for long-term care should be implemented as soon as possible, regardless of length of stay expectations, but especially whenever a stay is anticipated to exceed 1 or 2 weeks." Stays in the kennel are reported by ASD to average approximately eight days in the shelter; however, since implementing the No-Kill policy some animals have stays extending beyond 100 days. For instance, a review of the number of animals at the shelter on a randomly selected date (January 26, 2016), revealed 23 impounded animals had been at the shelter for over 50 days and as long as 109 days.

One of the most important aspects of care that provides not only physical well being, but also emotional and behavioral enrichment, is daily exercise. Not providing wholesome exercise for animals may cause them to develop symptoms, including but not limited to, aggression, kennel craze, and possible desensitization to humans. These resulting conditions make it more difficult for an animal to be adopted, and compromise the safety and welfare of the animals, staff, and public at the shelter. The OIG received an allegation that ASD does not provide wholesome exercise for the animals at the shelter, possibly in violation of law. Florida State Statute §828.13 regulates the confinement of animals without sufficient food, water, or exercise.

Specifically, §828.13, Fla. Stat. provides that the keeping of "...any animals in any enclosure without wholesome exercise and change of air" is a criminal violation. The term "wholesome exercise" is not defined in the statute. Various animal shelter and care agency representatives stated that there is no industry standard related to the exercise of animals within a shelter environment. However, according to the industry professionals, the longer the stay in a shelter the greater the need to provide animal enrichment through exercise and socialization.

According to ASD management, in direct response to the OIG's inquiry about compliance with the wholesome exercise provision, the shelter does not violate

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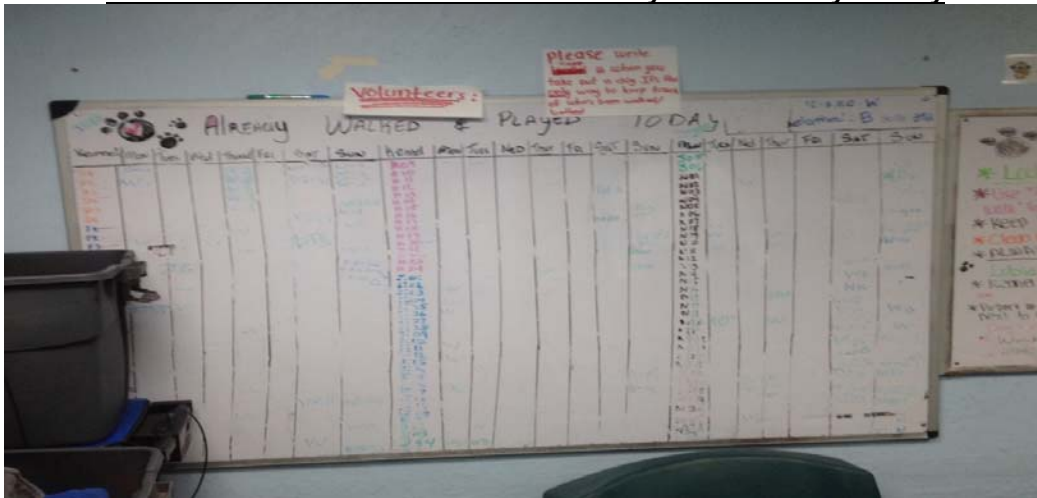
the statute. ASD management stated that “all housing units and kennel runs provide adequate space to allow animals to exercise freedom of movement, permit the animal to make normal postural adjustments, and include a resting space for the animal or animals contained therein.” While we find that ASD, as an animal shelter operator, is not in criminal violation of the aforementioned statute, we also contend that allowing animals to move around inside a kennel does not equate to actual exercise.

The OIG is aware that the daily exercise of shelter animals can strain ASD's limited resources of time, personnel, and budget. Also, as noted above, there is no industry standard or definition of “wholesome exercise.” As such, it is difficult, if not impossible, to determine legal compliance with the aforementioned statute. Nonetheless, the OIG learned that ASD hired a Volunteer Coordinator, funded through an ASPCA partnership, to manage a volunteer driven program of walking dogs impounded at the kennel. The use of volunteers is essential to ASD, as it relies solely on the volunteers to walk and exercise the dogs. However, the OIG found that the volunteers are not sufficiently supervised to ensure that tasks assigned are completed or performed correctly. At times, volunteers were not specifically assigned tasks, instead they walked, bathed, cleaned, and fed the animals as they determined.

ASD has no written policies and procedures addressing the frequency or minimum amount of exercise for dogs in the kennel. At the Medley shelter, a whiteboard was used to track whether animals were walked; this system was inadequately managed. The OIG observed, during numerous visits to the shelter, that the whiteboard was not being used. OIG investigators saw sporadic entries indicating an animal was walked. Interviews of various volunteers revealed that they did not mark the whiteboard after walking a dog in the hopes someone else would walk the dog again. This reasoning does not take into account that other dogs may be neglected while the dog already walked may be exercised more than once a day. It also highlights a lack of supervision of the volunteers and staff, as well as a lack of record keeping and tracking of this important activity. Even if the whiteboard had been used correctly, the OIG learned it was set-up to be erased on a weekly basis, without a mechanism in place to record the history of each dog's exercise. The photograph below shows the whiteboard during an OIG visit.

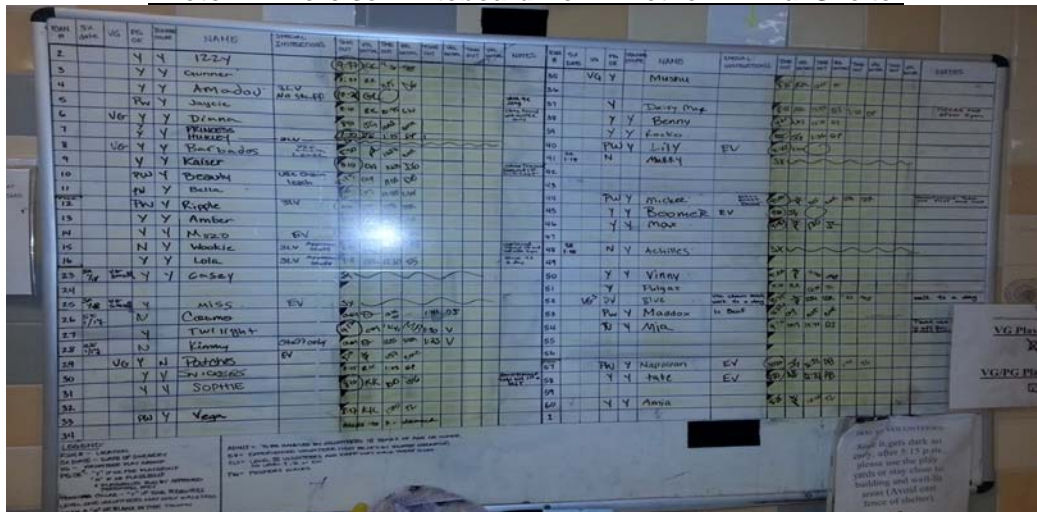
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Photo 1 - Whiteboard at Miami-Dade County ASD – Medley Facility



The following photograph is an example of the same whiteboard system used effectively at another shelter. This example of a whiteboard was provided by an outside agency in the animal shelter and care industry. The whiteboard is photographed at the end of each day in order to provide a tracking history and to identify kennels that should be prioritized the following day for exercise or other forms of enrichment.

Photo 2 - Exercise Whiteboard from Another Animal Shelter



During the course of the OIG's review, ASD took steps to enhance the provision of exercise and enrichment. In February 2015, ASD brought in a consultant from Dogs Playing for Life!™ (DPFL), an organization dedicated to instructing and assisting shelters in the implementation of playgroups as an enhancement and enrichment tool for kenneled dogs. DPFL provided an enrichment-program training seminar for ASD staff. In addition, DPFL was

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invited by ASD to assess the new Doral facility in April prior to the June opening. DPFL made numerous recommendations “for minor facility and operational adjustments to best meet the needs of the dogs from a behavioral perspective so that [ASD] can provide a safe and friendly environment for both animals and people.”

Playgroups are being instituted at the new shelter in Doral, which was also designed with outside spaces to play and walk. The OIG has also been informed that a Behavioral Program Administrative Officer will be hired for the Doral facility to ensure that the behavioral health and enrichment of the animals is addressed. The OIG has been provided with newly created forms used to track the daily exercise and playtime provided by the volunteers in the Doral facility. Clipboards are attached to each kennel section for the volunteers to track the exercise. These are all positive steps.

The OIG examined other issues affecting the welfare of animals. Of particular concern to the OIG were several allegations that ASD was either not providing needed medical care and treatment or providing improper medical treatment. In addition to a review of records, the OIG conducted interviews of the Chief Veterinarian, other veterinarians, veterinary staff, and other ASD staff members and volunteers in order to assess each alleged incident of medical mistreatment. **CASE EXAMPLES #6 AND #7** represent some of the allegations reviewed by the OIG. The OIG did not find improper medical treatment or lack of medical care by ASD.

An allegation of injuries caused by cleaning solutions used at ASD was also examined. The OIG found that in June 2012, ASD had incidents of burns and irritations to the animals caused by improper and inadequate rinsing of the cleaning solution. ASD took steps to correct the problem. The OIG found that ASD consulted with industry professionals in order to make appropriate cleaning solution changes and locate the safest, most effective product for the animals in the shelter. An interview of a consultant used by ASD, revealed that an effective cleaning solution is an integral part of a shelter's disease outbreak prevention process. Cleaning solutions that are effective at preventing an outbreak of disease can be an irritant if not properly handled and adequately rinsed. If the solution remained on the floor of the kennels or cages, the animals could be subject to skin irritation or burns.

The OIG found that ASD has made several changes in an effort to balance disease prevention and safety. The last changes to the cleaning solution took place in July 2013. The current solution, Accel, has significantly cut back on cases of these types of injuries for over two years. Although interviews of staff revealed some recent incidents of skin irritations to the animals, the incidents were due to staff not properly following the procedures now in place.

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The OIG also reviewed allegations that ASD staff was euthanizing animals by improperly mixing drugs causing a slow and painful death. The OIG examined Florida State Statutes regulating euthanasia, Chameleon entries, and conducted interviews of veterinarians, veterinarian technicians and other staff at ASD. Additionally, the OIG reviewed the various logs kept by ASD relating to the mixing, dispensing, and administering of controlled substances in order to determine the existence of any irregularities that would substantiate or refute the allegations.

The OIG found that ASD follows §828.058, Fla. Stat., euthanasia of dogs and cats, and its own internal procedures, which are based on the statute, in performing euthanasia. ASD administers Sodium Pentobarbital to perform euthanasia. Sedatives are used prior to euthanasia for aggressive, very fearful, or injured animals. ASD maintains several sedatives for such use and other medical needs. Among the sedatives used at ASD is Domitor Ketamine and Butorphanol, which must be mixed by an authorized veterinarian. The OIG's review of controlled substance logs, mixture logs, euthanasia logs, and interviews of veterinary staff and other staff, did not find evidence that mixtures are being made or administered by unauthorized individuals. The OIG did not find any evidence to substantiate the allegations that a mixture of drugs is being used to cause a slow and painful death to animals at the shelter.

In addition to the OIG's internal review, the OIG conducted interviews of personnel in other agencies in the animal shelter and care industry to determine their observations and experiences with ASD and the medical care provided at the shelter. Personnel from the ASPCA and the University of Florida were provided information and were satisfied with the medical care and treatment they have observed during their visits to ASD. Any concerns brought to the attention of the OIG from these independent observers would have been thoroughly reviewed; there were none. The OIG is satisfied that, contrary to the allegations, the animals received proper medical care and treatment.

RECOMMENDATIONS ADDRESSING ANIMAL WELFARE

- 6) The OIG recommends that ASD establish written policies and procedures regarding daily minimum exercise and other enrichment activities for all shelter animals. Procedures should at a minimum:
 - a. define the frequency of the exercise
 - b. establish how the activity will be tracked and information retained such as:
 - a computerized tracking system
 - an electronic whiteboard
 - interactive screens in each kennel interfaced with the computer system

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- c. account for exceptions to the exercise requirements, such as for medical reasons, legal reasons, and age of the animal
- d. ensure training and periodic re-training for volunteers

ASD Response and OIG rejoinder:

ASD agrees with this recommendation, has developed a written procedure, and advises in its response that the procedure will be reviewed for improvement.

C. SAVE RATE

A central theme of the allegations against ASD was that ASD manipulates records in order to show a favorable Save Rate. In assessing the accuracy of ASD's records, the OIG conducted numerous interviews of staff to gather information about the processes and procedures of documenting information. The OIG also reviewed entries in Chameleon and the various logs maintained by ASD, as well as ASD's policies and procedures. Interviews were also conducted of former employees and volunteers, and owners of animals that used the shelter's services. In addition, the OIG requested reports directly from the Miami-Dade County Information Technology Department (ITD), and performed its own analysis of ASD's reports. The OIG did not find intentional skewing of data resulting in a higher Save Rate percentage through manipulation of employees or records as will be discussed below.

1. Employees

The OIG reviewed allegations that employees were inappropriately rewarded and encouraged to promote incorrect data and falsify statistics. The OIG also reviewed an allegation that ASD has a quota system in place for Animal Control Officers designed to enhance the Save Rate. The OIG's review included an examination of staff performance evaluations, criteria for staff evaluations, and fringe benefit practices. ASD staff are compensated either by salary or hourly rate depending on the position classification. Most ASD employees have the opportunity to receive merit pay or cost of living increases if available within the annual budget, but there are currently no other payment incentives or bonuses available.

The OIG found that evaluations are performed annually and scored based on work quality, work quantity, work habits, and the employees' collaboration and interaction with peers and the public. ASD does not have quotas or minimum levels of citations, warnings or animal pick-ups that are required of Animal Control Specialists. ASD does, on a monthly basis, assess the overall performance of Animal Control Specialists. This performance measurement for Animal Control Specialists is determined by totaling the tasks, e.g., citations,

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warnings, pick-ups, and dividing that total by the total number of staff. This average serves as a benchmark to assess staff's performance. No predetermined amount of citations, warnings, or pick-ups are expected or imposed on staff. The monthly performance measure will vary based on the actual work accomplished during the time period evaluated. Merit based increases and employment are not based on any set amount of citations, warnings, or pick-ups. The OIG found that ASD, contrary to the allegation, does not have a quota system designed to enhance the Save Rate.

In reviewing ASD's staff performance evaluations the OIG found that ASD sends out emails recognizing Animal Control Specialists who have the highest number of strays successfully reunited with their owners. ASD tracks these figures through a report generated by Chameleon, which shows the number of "return to owner in the field" outcomes for each Animal Control Specialist. A review of the reports showing animals returned to owners in the field revealed a sharp increase between 2012 and 2013, from 248 to 451. The reports revealed animals returned to owners in the field increased further to 586 in 2014 and decreased to 558 in 2015. The OIG review found that although the number of "return to owner in the field" has a small effect on the Save Rate, it is not part of the criteria to be factored into the annual performance evaluation score for Animal Control Specialists, nor do they receive a monetary benefit.

The OIG received an allegation that ASD provided staff with monetary incentives for achieving certain outcomes. The OIG learned that a grant to ASD by the ASPCA, implemented in February 2013, provided funds to award individual employees incentives in an effort to increase adoptions. Using the grant funds, ASD provided individual staff members with gift cards. A grievance filed by employees whose job functions did not provide the opportunity to receive the incentives put a stop to the practice. ASD, after consulting with the grant donor, ASPCA, then used the funds to host group recognitions where food was served. The grant expired over a year ago and the incentives are no longer provided to ASD employees. The OIG did not find that employees were inappropriately rewarded and encouraged to promote incorrect data and falsify statistics.

2. Records

In order to investigate the allegations that ASD intentionally falsified information in order to positively affect the Save Rate percentage, the OIG conducted a thorough review of records and ASD's method to calculate the Save Rate. The OIG found that when ASD has reported Save Rates, typically only percentages are reported. The raw numbers on which those percentages are

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based, and any figures excluded, are not reported.²⁰ The OIG found that owner requested euthanasia figures have not been included in ASD's Save Rate calculations since 2011. The exclusion is consistent with accepted industry practice, however, ASD has not disclosed the omission of the figures in its calculation.

The OIG found that ASD does not provide the raw numbers used to calculate the Save Rate. ASD's website reports the Save Rate for 2015 in the following manner: "The save rate for dogs increased from 61% in 2015 [sic] to 90% in 2015." "The save rate for cats increased from 18% in 2010 to 90% in 2015." While these increases seem laudable, the public is left without any real information as to the number of dogs or cats "saved." The OIG found that other Florida counties, for example Lee and Alachua, publish on their websites an "Animal Statistics Table" containing the total numbers for both dogs and cats taken into the shelters and subtotals of intake categories and outcome categories. Those counties follow the reporting guidelines of the Asilomar Accords (Accords). The Accords are a set of guiding principles that provide a formula and a statistics table to be used by shelters to track and determine a shelter's Save Rate or live release rate.²¹ The OIG found that from 2007 through 2010, ASD was listed as a participating agency of the Accords. Agencies reporting per the Accords include the annual Save Rate percentage, a disclosure/disclaimer statement on any figures not included in the calculation, and a statistics table with a breakdown of the numbers by dogs, cats, and the combined totals used to calculate the annual rate. Attached as Exhibit 3 is a sample Annual Animal Statistics Table with the Accords Live Release Rate formula. Exhibit 4 is the Accords' sample report. The Accords state that agencies should publish statistics annually in order to provide organizational transparency and a yardstick for the public.

The information used to calculate the Save Rate is taken from ASD's electronic case management system, Chameleon. Chameleon consists of a series of screens containing multiple entry fields related to an animal's stay at the shelter or treatment through the clinic. Chameleon tracks how the animal arrived at the shelter, the condition of the animal, and how the animal leaves the shelter. Information regarding animals that are impounded is logged into the Kennel Screen. Information about animals that are brought in by owners for the various clinic services is entered into the Tag/Link Screen. ASD's clinic provides euthanasia services at a lower cost than private veterinarians for owners that

²⁰ ASD management staff interviewed stated that percentages are used when it comes to reporting Save Rates and euthanasia to the public, because one animal shown as euthanized is considered a tragedy.

²¹ See www.asilomaraccords.org. ASD's Director advised OIG investigators that Save Rate and Live Release Rate are terms used interchangeably within the animal shelter industry.

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seek euthanasia for their infirm pets. Animals brought to ASD's clinic with a request to be euthanized by their owners are evaluated by ASD Veterinarians.

The OIG learned that animals logged in through the Kennel Screen, that is, impounded animals, must have an "intake" entry and an "outcome" entry to indicate the animal is no longer in the shelter and the file closed. Only certain outcomes recorded in the Kennel Screen are used to calculate the Save Rate.²² Outcomes and information reported in the Tag/Link screen (clinic services screen) are not part of the Save Rate calculation.

ASD computes the Save Rate by dividing the total number of animals released live, which are calculated from the positive outcomes, by the total number of both positive and negative animal outcomes. Positive animal outcomes consist of outcomes such as adoption, rescued, transported, returned to owner, etc. Negative animal outcomes consist of outcomes such as euthanized, died, escaped, missing, etc. Owner requested euthanasia figures are not included in the Save Rate calculation.

The Save Rate calculation is done manually by ASD. However, the data used to do the manual calculation is gathered from a report generated by Chameleon. The report captures the positive and negative outcomes entered into Chameleon's Kennel Screen for the requested time period.

The OIG requested that ITD compile a report from entries in Chameleon for the period of January 2013 through July 2015. The parameters for the requested report were for all shelter animals that had been released and had returned to the ASD clinic for services. Specifically, the report was designed to capture animals that had a kennel intake and outcome and also had a euthanasia request by the owner recorded as an entry of "fatal" in the medication field of the Tag/Link screen. The objective was to identify if ASD was manipulating the Save Rate by shifting the reports of euthanasia to the clinic Tag/Link screen records, while recording positive outcomes in the Kennel Screen. Euthanasia recorded in the Tag/Link screen is not used to calculate the Save Rate. Significant increases in positive outcomes in the Kennel Screen could positively affect the Save Rate.

The report provided by ITD contained a total of 329 Animal ID records of which 302 were unique (not duplicate) Animal ID records. The OIG reviewed the records and found what appear to be errors, inaccuracies, or conflicts in 127 of the 329 records. While some of the issues noted resulted in positive outcomes

²² While animals are being fostered, Chameleon would indicate an outcome of foster. "Foster" however, is not the permanent outcome for that pet and would not be counted in the Save Rate calculation. Animals in foster care are still considered to be part of the shelter's population until their permanent outcome is recorded.

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and some negative outcomes recorded in the Kennel screen, none had an impact on the actual Save Rate percentage reported. The OIG also conducted interviews of staff, former employees, and outside parties and found no directive by ASD management to manipulate and skew the shelter's numbers to affect reported the Save Rate.

In addition to the Chameleon entries, ASD maintains a Euthanasia Log, a record kept in accordance with DEA requirements to track the use of controlled substances. The OIG performed a random sample of Animal ID records entered in the Euthanasia Log for calendar year 2013, and compared the sample, of 193 records, to the same Animal ID records maintained in Chameleon.²³ This sample was conducted to determine whether the Chameleon report captured the records from the correct screen, i.e., the Kennel Screen and not the Tag/Link Screen. The testing concluded that the parameters for capturing the data in order to calculate the Save Rate were correct.

A review of records for calendar year 2014, found that the Chameleon report used to support the Save Rate calculation erroneously contained missing, escaped, and unknown as positive animal outcomes. The OIG found that the parameters used to compile the report incorrectly labeled missing, escaped, and unknown as positive instead of negative animal outcomes. The combined number of incorrectly labeled outcomes for calendar year 2014, amounted to 83 records. The OIG verified that in completing the manual Save Rate calculations, ASD caught the parameter errors; consequently the errors did not affect the Save Rate.

The OIG also reviewed an allegation that ASD altered, manipulated, or falsified records concerning the reporting of animals as "died" while in the care of the shelter. The outcome of "died" is counted negatively in the Save Rate calculation reported by ASD. Specifically, the concern was that the number of "died" reported had significantly increased in recent years. Implicit in the allegation is that ASD would rather publicly report the "died" outcome than the "euthanasia" outcome.

²³ The sample size of approximately 8,000 records with a confidence level equal to 95% and an interval equal to 7% would equal approximately 193 sampled records. The sample of 193 records, were not duplicative of the 329 records also sampled and previously mentioned in this report. The OIG found that approximately 85% of the 193 records sampled were on both the Euthanasia Log and showed as euthanized in Chameleon's Kennel Screen. Approximately 15% of the sampled records were in the Euthanasia Log and not in the Chameleon report. The OIG found that approximately 15% of records that were only in the Euthanasia log correspond to the owner requests for euthanasia entered in the Tag/Link Screen and were legitimately not captured for the Save Rate calculation.

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The OIG learned that animals reported as “died” consist of four categories: animals that died while en route, in foster, in kennel, or in surgery. The records reviewed by the OIG revealed the number of animals reported by ASD as “died” for calendar years 2011 through 2015, ranged from 266 to 558 animals. Exhibit 5 contains charts summarizing the totals. The number of animals reported as “died” peaked at 558 in 2013, and then has subsequently decreased to 501 in 2014, and further to 335 in 2015.

ASD primarily attributes the subsequent decrease after 2013 to the implementation of new programs and lifesaving efforts as a result of the No-Kill goal. As explained to the OIG by ASD management, prior to the No-Kill goal, neonates (newborn kittens and puppies) that failed to thrive would have been humanely euthanized. Specifically, ASD identified over 300 neonates that failed to survive as the primary cause for the high death numbers in 2013.

As a result, ASD took steps to increase the care of neonates and increase their survival rate. ASD staff advised that a Neonate Foster Coordinator was hired in 2015 to train individuals who foster animals on the skills necessary to properly deal with the needs and care of newborn kittens and puppies. ASD uses foster providers to handle neonates because it does not have enough staff and resources to provide the 24-hour care needed by neonates. The decrease in the 2015 numbers reflects the success of the neonate fostering program. The OIG did not find, as suggested by the allegations, that ASD intentionally manipulated the information in order to positively affect the Save Rate percentage.

RECOMMENDATION ADDRESSING THE SAVE RATE

- 7) The OIG recommends that ASD use the formula and reporting methodology suggested by the Accords in calculating and reporting the Save Rate on an annual basis. ASD should clearly state the time frame for the figures reported, and specify what is included or excluded from the figures reported.

ASD Response and OIG rejoinder:

ASD “...agrees with the OIG recommendation to use the Asilomar Accords and to post the raw data online. The Department accepts this recommendation.” The OIG believes implementing the Asilomar Accords reporting model will increase transparency and ultimately benefit ASD.

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D. CHAMELEON RECORD KEEPING

During the course of reviewing the allegations relating to the Save Rate calculations, the OIG found errors in Chameleon records. None of the errors reviewed by the OIG had an impact on the actual Save Rate percentage reported. Even if errors do not ultimately affect the Save Rate percentage, they should be corrected. To conduct this review the OIG examined multiple entries on several screens and fields, paper records, and for many of the specific examples cited in this report, conducted interviews of owners, staff, or volunteers in order to determine where and how any errors occurred. The OIG found differences between entries made in Chameleon screens and the paperwork reviewed. The erroneous outcomes were both positive and negative. The total number of errors found by the OIG was nominal and did not affect the Save Rate percentage reported. It appears, from the examples reviewed, that ASD does not have a uniform method of correcting erroneous intake entries.

For example, the OIG learned that when performing euthanasia, either as a clinic service to owners or of impounded shelter animals, the euthanasia is recorded in Chameleon prior to the actual procedure. For various reasons, scheduled euthanasia procedures are not always performed. If the entries are not corrected, some screens in Chameleon will reflect the animal has been euthanized while other screens indicate the animal is still alive.²⁴ These conflicts or inconsistencies between fields cannot be explained unless a comprehensive search of all fields, screens, and notes is conducted to account for the discrepancies. **CASE EXAMPLE #8** is an illustration of this issue. During the final post-draft review meeting with ASD management, the OIG was advised that ASD is now running additional audit reports to capture errors and make corrections.

The OIG's review of the 329 records compiled by ITD found that 127 records contained what appear to be inconsistent entries. For example, the OIG found records with the following entries in different screens:

1. An entry of "returned to owner" on the same date as an entry of "fatal."

The OIG examined the 78 records with those entries. Although it may appear inconsistent to state that an animal was "returned to owner" on the same date as a "fatal," the OIG found no issue with many of the records. For example, an injured animal impounded as a stray can have an outcome of "returned to owner" and then due to the extent of the injuries the owner requested euthanasia resulting in an entry of "fatal." Also, as in **CASE EXAMPLE #9**, confiscated animals can be returned to owners who

²⁴ A veterinarian may re-evaluate medical decisions or an animal's aggressiveness and cancel or delay euthanasia.

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then request euthanasia. Additionally, animals brought in for euthanasia often are impounded as strays because the individuals bringing in the animals are not listed as the owner on the animal's registration.²⁵ An outcome of "return to owner" followed by an indication of "fatal" in the Tag/Link screen would then be recorded upon completion of an *Owner Requested Euthanasia Form* by the owner of record. The OIG did find 21 records that appear to have erroneous intake entries. Those records contained positive outcome entries and then the appropriate entries in the Tag/Link screen indicating an owner requested euthanasia. Through the post-draft review, the OIG is aware that ASD can now enter "void" as an outcome in those instances where an erroneous intake entry was made. The use of "void" will clearly indicate an error and can be excluded from any reports used to gather Save Rate data. Again, these 21 records did not affect the Save Rate percentage reported.

2. An entry of "Euthanasia" on the same date as an entry of "fatal."

The OIG found 8 records with these entries, they are listed in Exhibit 7. The OIG reviewed the completed *Owner Requested Euthanasia* forms for these records. Similar to the 21 entries mentioned above, the records also contain erroneous intake entries in the Kennel Screen. For these records, however, negative outcome entries were entered to close out the Kennel Screen records.²⁶

3. An entry of "adopted" dated after an entry of "fatal."

The OIG examined four records containing these entries. All four were cases where owners requested euthanasia of their pets. Entries of "fatal" were made in the Tag/Link screen prior to the procedure. The procedures were not performed. All the animals were impounded and eventually adopted.

4. An entry of "died"²⁷ after an entry of "fatal."

The OIG examined two records with these entries. It appears, in both cases, the owners requested euthanasia for their cats. There should not have been any Kennel intake entries. The outcome entries of "died" were negative outcomes. Fatal was recorded in the Tag/Link screen appropriately.

²⁵ Some records indicated the spouse or sibling of the registered owner brought in the animal.

²⁶ Independent of the 127 records, the OIG found another eight records where similarly, animal records contained *Owner Requested Euthanasia* forms signed on the same date as erroneous Kennel Screen intakes and negative outcome entries.

²⁷ An entry of "died" denotes the animal died while at the shelter of illness or other causes.

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5. An entry of "active" after an entry of "fatal."

The OIG found 34 records with these entries. The OIG was advised that Chameleon does not automatically update or populate other fields in that animal's record with current information. For example, the status field in the Animal Screen can reflect the animal as "active," i.e., available for adoption, even after an entry indicating euthanasia has been made in another field. Staff must manually update numerous fields in Chameleon to ensure the information is current and accurate. In these instances the manual updates were not done.

OIG investigators also looked at *Owner Requested Euthanasia* forms to see if there were record keeping errors in connection with those entries in Chameleon's Tag/Link Screen. The OIG reviewed Chameleon records of owner requested euthanasia for several years, but conducted a particular review of records for the calendar year 2015. A Chameleon generated report lists 1,279 owner requests for euthanasia in calendar year 2015. The report lists 16 of those requests as denied by ASD veterinarians. Exhibit 8 contains charts summarizing the totals. A close review of all Chameleon fields, screens, and notes for the 16 identified in the report revealed that three animals were actually euthanized on the same date as the entries indicating denied. The OIG did not find errors with the three records. Instead, the OIG found that a drop down menu field was being used for two different purposes.

In the Tag/Link Screen's Status Field the entry "void" from a drop down menu is used for two purposes. It is used 1) to indicate a veterinarian's denial of an owner's request for euthanasia and 2) to indicate an entry/input error in the Tag/Link Screen. In the case of the three animals euthanized that also contained entries of "void," the term "void" was not used to indicate a denial by the veterinarian. The OIG found that in each case "void" was used to indicate a data entry error. The use of one term to record different events creates a conflict in the records, and can result in confusion and misinformation.

The OIG also found that ASD staff is not consistent in entering and scanning records. *Owner Euthanasia Confirmation* and *Pet Release Form for Stray Animal*²⁸ forms are not consistently scanned into Chameleon. In addition, the procedures are themselves inconsistent, requiring the scanning of the *Pet Release Form for Stray Animal*, but not for *Owner Euthanasia Confirmation Form*. ASD maintains hardcopies of forms; they are stored at the shelter or at an off-site storage facility depending on the age of the records. Obtaining

²⁸ A form to be filled out by anyone bringing a stray animal to the shelter.

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hardcopies of these records was very difficult; not all of the items requested by the OIG were provided.

The records reviewed had what appeared to be conflicting entries between the Kennel and Tag/Link screens. While the apparent inconsistencies had valid explanations for some records, other records contained intake errors in the Kennel Screen. **CASE EXAMPLES #9 THROUGH 12** illustrate these issues. Some of the specific case examples were reviewed as part of the OIG's examination of the various allegations of intentional manipulation of the Save Rate. The OIG did not find the intentional skewing of the data, and the errors noted in these examples, did not affect the Save Rate percentage reported.

The OIG contacted ITD and discussed the available options and functionalities of Chameleon. In particular the OIG was concerned with Chameleon options that would enable corrections of input errors. ITD was able to provide the OIG with various reports and information. The OIG learned that: ASD has the ability to correct entries in Chameleon, ASD management can set system parameters and grant permissions to enter corrections to designated staff, and can run history reports showing any corrections made to Chameleon records. In addition, an option of "void" is available in the outcome Kennel Screen that can be used to close out any erroneous intake entries in the Kennel Screen. ASD also has the ability to enter notes to fully explain any corrections of errors.

Given that ASD has the ability to correct errors in Chameleon, ASD should have a system in place to correct errors as they occur or within a set amount of time. Audit reports, such as the OIG has been advised are now being conducted, are essential in ensuring records are accurate. ASD should also train staff on the use of "void" as a Kennel outcome in those instances when an erroneous Kennel intake entry has been made. ASD management should also periodically review the use of "void."

RECOMMENDATIONS ADDRESSING CHAMELEON RECORD KEEPING

- 8) ASD should explore modifications, updates, and training relating to Chameleon:
 - a. ASD should develop a uniform method of correcting input and entry errors in Chameleon, including setting standards for running audit or history reports to capture errors and enter corrections.
 - b. Expand the categories of entries available in drop down menus to avoid multiple use of terms for different actions and activities; add an additional drop down option to the Tag/Link screen's Status

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Field to account for the two actions currently labeled as "void." "Void" can remain the option to indicate an entry/input error in the Tag/Link Screen. That use of "void" would be consistent with the use of "void" in the Kennel Screen. A separate drop down option should be created to indicate a veterinarian's denial of an owner's request for euthanasia.

- c. Add an option within the Tag/Link Screen to indicate that owner verification is pending when a non-registered owner brings in an animal for euthanasia. The addition would avoid having to enter the animal in the Kennel Screen system. Alternatively, add other options to the Kennel Screen intake and outcome fields that would indicate the intake was done pending registered owner verification.
- d. Additional training of staff in updating fields that are not automatically updated by the system, such as the "status field."
- e. ASD should conduct regular training of staff in the use of Chameleon, to eliminate or minimize data entry errors. The training should include training on the use of "void" in cases of erroneous intakes in the Kennel Screen. Staff should be trained to explain corrections of errors in the Notes section of Chameleon.

ASD Response and OIG rejoinder:

These recommendations have been modified. In its response to the draft report ASD agreed with the recommendations to modify or update Chameleon. ASD sharply criticized the OIG's observations regarding input and clerical errors in Chameleon, while agreeing that Chameleon's limitations prevented corrections. Specifically, the response stated that ASD "...recognizes the shortcomings associated with the Chameleon software and has extensively researched multiple shelter software systems to identify a system with greater flexibility..." ASD did not also indicate that it had identified a method to capture the errors highlighted by the OIG and how to correct them. The OIG's renewed review revealed Chameleon's additional functionality allowing expanded fields and correction of errors. The recommendations have been modified given these findings. The OIG notes that although recommendation 8b, above, remains the same, ASD did not directly address this recommendation in its response.

- 9) ASD should revise its procedures to ensure that all forms: *Owner Euthanasia Confirmation Form* and *Pet Release Form for Stray Animal* are required to be scanned into Chameleon or an updated records management system.

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ASD Response and OIG rejoinder:

ASD in its response agrees with the OIG's finding and advises that ASD now has additional staff and scanners.

E. RECORDS RECONCILIATION

In addition to examining ASD's records for accuracy, the OIG looked to how ASD reconciles its various records. Reconciliations are important to ensure the completeness and accuracy of multiple sources of information. The OIG found that ASD does not reconcile euthanasia figures reported via the Euthanasia Log with the records reported through Chameleon. ASD also does not reconcile the number of animals that die or are euthanized with the number of animals disposed.

The Euthanasia Log tracks the date, Animal ID Number, bottle number of drug used, the weight of the animal, the amount of drug used, the type of procedure, the staff member who performed the euthanasia, and the reason for the euthanasia. Reconciling these entries with the entries in Chameleon is important in ensuring that data is accurate, and that errors can be corrected or explained.

The OIG reviewed the number of euthanasia deaths reported in both Chameleon reports and the Euthanasia Log for the calendar year 2013. The OIG found a failure to reconcile drug usage between the Euthanasia Log and the records maintained in Chameleon. The sample of the 193 Animal ID records, previously mentioned in Section C, revealed twelve records for which the reported controlled substance dosage used for euthanasia did not match between the Euthanasia Log and Chameleon. For eight of the records the Euthanasia Log lists a controlled substance dosage, and no dosage was recorded in Chameleon. For three of the records the Euthanasia Log lists a controlled substance dosage, different than the dosage noted in Chameleon.

Similar to the procedure used to enter euthanasia information in Chameleon, the information must be entered in the Euthanasia Log prior to the procedure. The OIG found some conflicts between the entries in the Euthanasia Log and Chameleon. In some cases the Euthanasia Log was not corrected after a procedure was cancelled. The error in dosage is then carried forward to the next entry and all subsequent entries. The Euthanasia Log entries should have been lined through to avoid carrying the error forward. It is particularly important to immediately correct these type of errors to avoid any loss or theft of controlled substances. In another instance the amounts in the Euthanasia Log and Chameleon did not correspond. **CASE EXAMPLES # 8, 13, & 14** demonstrate these errors. Interviews of various staff members revealed that ASD does not perform

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analysis on the volume of controlled substances and pharmaceuticals as a control measure.

The OIG's on-going review prompted ASD to perform a reconciliation of the Euthanasia Log to the Chameleon records in October 2015. The results of ASD's reconciliation, for calendar years 2012 through 2014, show that the Euthanasia Log figures were lower than the figures reported through Chameleon, for both the euthanasia reported of impounded animals in the shelter and for owner requested euthanasia. The variances, as seen below, were eight records for 2012, 170 records for 2013 and 94 records for 2014.

Figure 1 - Reconciliation of the Euthanasia Log to Chameleon Reports

Log Book Euth Reconciliation			
	Calendar Year		
	2012	2013	2014
Euth Type			
Shelter	11,153	6,888	5,140
Owner Requested	1,115	1,305	1,886
Service			
Both Services			
Combined Total	12,268	8,193	7,026
Log Book	12,260	8,023	6,932

(Source - ASD)

ASD attributes these variances to the procedure for recording euthanasia, which requires the entries to be made in Chameleon first and then in the Euthanasia Log. Both entries are made prior to the actual euthanasia. As a result, after an entry in Chameleon, but prior to the entry in the Euthanasia Log a decision can be made not to euthanize an animal. The result would be that no entry would be made in the Euthanasia Log and an erroneous entry would be entered in Chameleon. ASD advised the OIG that they could not correct the dosage in Chameleon. During the post-draft review, ASD reiterated that "ASD policy and Chameleon procedures do not allow for the drug dosage [entered in Chameleon] to be modified." ASD management has advised the OIG that having raised the issue they made an effort to uncover the extent of Chameleon's functionality. ASD is capable of making corrections to the dosage entered in Chameleon's Kennel Screen. The OIG in consultation with ITD and a representative of HLP, Inc., the Chameleon software provider, has learned that corrections can also be made to the dosage field in the Treatment Screen of the Tag/Link Screen, which records clinic services.²⁹

The OIG also found that ASD does not reconcile the number of animals reported as died and the number of animals reported euthanized against the

²⁹ The OIG does not have an example of a change to the dosage amount in the treatment screen.

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number of animals disposed. The OIG looked into the disposal of animals because of an allegation that ASD was using the incinerator improperly, and in some cases incinerating animals while alive. The OIG found the allegations to be completely baseless. ASD does not dispose of deceased animals via incinerator. Through extensive interviews of ASD staff the OIG verified that the incinerator at the Medley facility has not been used since prior to 2000. The Doral facility does not have an incinerator. The OIG found that ASD does not maintain records of the number of animals disposed.

The OIG learned that deceased animals are disposed of by ASD in a specifically designated part of the South Dade landfill. ASD disposal technicians pick up deceased animals found throughout the County, from ASD, and from other municipalities that have animal control services in the County. The OIG learned that the disposal technicians keep a daily Disposal Activity Report which tracks their time, location, and activity. They also track the number and type of dead animals picked up from the field. Disposal technicians do not, however, track the number of animals picked up at the shelter. ASD has no log or other tracking mechanism accounting for the total number of deceased animals disposed. Without a tracking mechanism for the disposed animals, there can be no reconciliation of the disposal numbers to the totals in Chameleon.

RECOMMENDATIONS ADDRESSING RECORDS RECONCILIATION

- 10) The OIG recommends that ASD perform periodic reconciliations of the Euthanasia Log and Chameleon records. Reconciling these entries with the entries in Chameleon is important in ensuring that data is accurate, and that errors can be corrected or explained.

ASD Response and OIG rejoinder:

ASD does not agree with this recommendation, and states repeatedly that reconciliation of the records is not required. Although not required, the OIG believes that a reconciliation of the Euthanasia Log and Chameleon records is important in ensuring record information is correct.

- 11) The OIG recommends that ASD train or retrain employees on verifying dosages of controlled substances and the notations made in both the Euthanasia Log and Chameleon. Periodic reviews by supervisors and reconciliations can avoid errors in dosage from being carried forward and from inaccuracies in the records.

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ASD Response and OIG rejoinder:

ASD agrees with the recommendation and assures the OIG that the department "...maintains a certified euthanasia instructor on staff to ensure the state-mandated training, as well as retraining are readily accessible to staff."

- 12) ASD should develop a log or other tracking mechanism to account for the total number of deceased animals sent for disposal to the County landfill. Tracking is essential in reconciling the numbers with the records in Chameleon and the charges associated with the disposal.

ASD Response and OIG rejoinder:

ASD agrees that the "...OIG correctly says that animals reported euthanized are not reconciled with Chameleon." However, ASD does not accept the recommendation because "[i]n consulting with other shelter experts, the Department confirmed that this is not a practice or industry standard." Although not an industry standard, ASD should nevertheless consider implementing the recommendation as it will be a useful tool in ensuring accuracy of records and costs.

F. TRANSFERS TO RESCUE ORGANIZATIONS

The ASD Rescue Program was established in 2007. Under the program, ASD enters into agreements with rescue organizations and transfers animals to these organizations to house, care, and seek permanent homes for the animals. Often the rescue organizations will take sick or special needs animals that are not easily adoptable and would otherwise be confined for long periods at the shelter. According to ASD, the Rescue Program has saved over 20,000 animals since its inception. The Rescue Program is a vital part of ASD's ability to save animals from longer stays at the shelter. ASD is required to maintain information on animals transferred to rescue organizations.

Section 5-5(c) of the Code of Miami-Dade County (County Code) provides the Director of ASD with the discretion to enter into rescue agreements with rescue organizations. The County Code also requires that written agreements with rescue organizations contain verification that animals have been spayed or neutered within 30 days of being transferred.³⁰ The County Code further requires that the written agreements contain provisions for periodic reports on the disposition of animals, and that ASD have a right to reclaim animals. Rescue

³⁰ The County Code provision follows the mandate of Florida Statute §823.15.

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organizations must meet certain other requirements enumerated in the County Code and provide documentation to ASD.

As part of this review the OIG requested that ASD provide the written agreements for four (4) rescue organizations. Initially, the OIG requested the agreement and reports of one Canadian rescue organization that had numerous transfers of dogs entered in Chameleon as "adoptions." The OIG then expanded the request to include an additional three organizations in order to have some examples of ASD's records and the reports being provided by the rescue organizations.

After repeated requests, ASD management advised the OIG that the Canadian organization is "not a rescue partner, they are not subject to reporting." In spite of ASD's statement, the organization identifies itself as a rescue organization; its very name identifies it as such. Furthermore, in an email reviewed by the OIG, ASD management referred to the organization as "a horse and dog rescue in Canada." ASD management also advised the OIG that there is no rescue agreement with the Canadian organization because it is located outside the United States. Due to the lack of an agreement, the animals are not entered into the system as "rescued," they are entered in Chameleon as "adopted." The OIG notes that even if the Canadian organization does not meet the definition of a rescue organization, ASD should, nevertheless, under the authority it has in Section 5-5(d) of the County Code, enter into a written agreement with the Canadian organization.³¹

Section 5-5(c) of the County Code states that ASD may "transfer animals to an animal rescue organization for medical care, for adoption, for adoption to third parties, or for any other lawful purpose" if the organization enters into a written agreement with ASD that provides:

- the organization guarantees it will comply with the spay/neutering requirements in § 823.15, Fla. Stat.
- "the organization periodically report to [ASD] on the disposition of animals acquired from [ASD]" and
- ASD has the right to reclaim animals that are being maintained in violation of the County Code

³¹ 5-5(d) grants the Director the authority to "...enter into agreements with other persons to encourage the adoption of animals or to provide for animals in the custody of the Department...provided that the agreements otherwise require no expenditure of additional funds by the County, and subject to the approval of the County Attorney."

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ASD did have written agreements with the other three rescue organizations. After repeated requests, the OIG was provided with the agreements and a report generated from Chameleon indicating the spay/neuter compliance for the three rescue organizations. However, reports regarding the disposition of the animals transferred to those three organizations were not provided. The OIG interviewed the rescue organization representatives and ASD management and staff regarding the documents received and the lack of reports concerning the animal outcomes.

The agreements provided by ASD for all three rescue organizations contained clauses requiring that the sterilization requirements under § 823.15, Fla. Stat. be met and reported within 30 days. The agreements also contained a clause specifying ASD's right to reclaim animals. The requirement to periodically report on the disposition of animals varied in each of the agreements. The original agreement signed by one organization in 2007 specified a reporting requirement by the 7th of each month. Another organization was required to report at the end of the month. The third organization, the Humane Society of Greater Miami (Humane Society), was not required to report the disposition of animals acquired from ASD.

The OIG verified with the Humane Society that ASD had not requested periodic reports on the disposition of animals. The Humane Society, for its own internal records, does maintain the information on the disposition of animals. The Humane Society noted that they are not included in the group communications sent by ASD to rescue organizations. In response to the OIG's inquiry, ASD management stated that the Humane Society is not a rescue organization therefore, the reporting requirements under the County Code are not applicable. Section 5-1(3) of the County Code however, specifically includes "a humane society" in the definition of an animal rescue organization.

The OIG learned that this past August, ASD revised the agreements with all rescue organizations and required that they execute the new agreements or they would be unable to continue to receive animals. The OIG received the renewed agreement from one of the rescue organizations requested. The reporting requirement under the revised agreements now states:

"In addition, for each animal that the RESCUE GROUP obtains from the COUNTY, the RESCUE GROUP shall provide, at the COUNTY's request, the name, address, and telephone number of the adopter or rescue organization to whom the RESCUE GROUP has transferred the animal. By entering into this agreement, the animal rescue organization agrees to periodically

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report to the Department on the disposition of animals
acquired from the Department upon request”

The OIG interviewed ASD Rescue Coordinators and ASD management, including the Director, regarding the rescue agreements and the reporting of the disposition of the animals sent to rescue organizations. The Director advised the OIG that ASD obtains reports from rescue organizations regarding the spaying/neutering of animals transferred. These reports are required not only by the County Code but by state statute. The Director acknowledged that, starting prior to his administration, reports on the disposition of animals transferred to rescue organizations had not been required. He acknowledged that the new agreements were executed in order to revise the reporting requirements.

The ASD Rescue Coordinators that the OIG interviewed advised that they keep track of the spay/neuter requirements. They regularly receive verification of spaying/neutering or justification for delay (medical reasons may prevent spaying/neutering within the required timeframe). ASD is able to generate a report from Chameleon to track each rescue organization's compliance with spay/neuter requirements. The Rescue Coordinators follow up with each organization to ensure that the procedures are performed and that ASD receives the verification documentation. ASD Rescue Coordinators, on a monthly basis, randomly select ten animals and request the rescue organization provide medical follow up and disposition information. Rescue organizations pull hundreds of animals each year. Prior to the revised agreements this August, ASD had agreements with 120 organizations. The OIG has been advised by ASD that approximately 50 rescue organizations have executed the new agreement.

Randomly selecting ten animals a month, without a system in place to track the selection and the reports does not accomplish the mandate of the County Code. The County Code mandates that the agreement include a periodic reporting requirement by each organization “on the disposition of animals acquired from the Department.” The OIG is mindful that ASD's transfer of dogs to rescue organizations achieves the core mission of saving lives.

At a minimum, these periodic reports would serve as a tool to evaluate the performance or any potential problems with the organizations. For example, OIG investigators went to three of the rescue organizations selected for review.³² The OIG found that the Humane Society and one other organization have outstanding facilities and maintain good records. However, one of the organizations had multiple addresses, all of them residential homes. The OIG visited two of the homes. At the time of the visit both homes were under substantial reconstruction due to the conditions of the properties after housing animals. At least one of the

³² The OIG did not travel to the Canadian rescue organization.

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homes was described by the landlord as housing more than the legally allowed number of pets in a single residence. At this time, the OIG has not been able to verify the location or condition of the animals transferred to that rescue organization. The OIG has been unable to locate the current representative, but OIG investigators have been told that she may be in hospice. The previous representative of the organization is now out of state, and has provided some information to the OIG. According to the previous representative, "all the dogs have ended up everywhere else but in Miami Dade County..." "Our pulled dogs on the list you provided are generally in Broward and Palm Beach counties, and Central and Northern Florida, and some (specific breed rescues) as far as Texas and South and North Carolina. Also, some dogs are deceased, they were either really old or really sick coming out of MDAS."³³

Had ASD received periodic reports from that particular organization as to the disposition of the animals, ASD might have been able to determine whether the organization was efficiently seeking homes for the animals or whether the organization had more animals than it was capable of handling safely. ASD is able to keep track of the animals "pulled" by rescue organizations and their spay/neuter requirements. ASD can incorporate the requests for information on the disposition of animals into its already established system of tracking and reporting. Tracking the disposition would enable ASD to ensure the safety of the animals in accordance with the County Code. ASD has clearly not monitored or followed up on the requirements placed on the organizations to report on a monthly basis. Under the new agreements, ASD has squarely placed the burden on itself to "request" the periodic reports.

RECOMMENDATIONS ADDRESSING TRANSFERS TO RESCUE ORGANIZATIONS

- 13) The OIG recommends that ASD develop a procedure to request from rescue organizations information on the disposition of all animals transferred from ASD's care. Given that procedures are already in place to track the spay/neuter compliance, ASD can add the request for disposition information to the spay/neuter compliance requests. ASD must be able to track the disposition, identify concerns and take follow up action with the organizations. Given the new agreements the onus is on ASD to make the periodic requests of all the rescue organizations in compliance with Section 5-5(c) of the Code of Miami-Dade County.

³³ MDAS is an acronym for Miami-Dade Animal Services.

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ASD Response and OIG rejoinder:

ASD asserts that they have made improvements to the agreements and have "...implemented the process of randomly selecting pets that were transferred to a rescue partner for reporting." ASD misapprehends the recommendation, which focuses on ensuring the information is obtained and tracked and not on the revisions to the agreements. Although the new agreements allow ASD to request the disposition, without a procedure in place to request the disposition information on a pre-determined basis, ASD cannot ensure that it will receive the information from all the rescue organizations. In fact, the samples reviewed by the OIG, are illustrative of the need to develop a procedure as recommended. Even though the old agreements contained specific timeframes for reporting, ASD did not follow up on those requirements. Under the new agreements ASD will make periodic requests of the rescue organizations for the information. It is difficult to understand how ASD will ensure it is receiving the information without a plan in place to make the requests and track the information.

- 14) The OIG recommends that ASD enter into a formal written agreement with the aforementioned Canadian rescue organization.

ASD Response and OIG rejoinder:

ASD agrees with the OIG's recommendation.

G. SECURITY OF FACILITIES & CONTROLLED SUBSTANCES

Due to the veterinary services performed at ASD, there are certain physical areas of the facility that must be secured and to which access must be authorized and controlled. In addition, ASD must secure and account for the controlled substances used to treat and euthanize animals. The OIG reviewed ASD's control of these areas and the procedures in place to ensure security.

Only authorized staff should have access to certain areas within the shelter. For example, the ward where euthanasia procedures are performed and controlled substances are kept, should be restricted to employees authorized to perform euthanasia. [REDACTED]

[REDACTED] In addition, the new Doral facility has a dispensary where all pharmaceuticals used for medical treatments are maintained and dispensed as needed. These areas should be considered restricted and limited to authorized personnel. These areas need to be secure, in compliance with laws and regulations pertaining to controlled substances, as they pose a risk of theft and potential liability to ASD.

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The OIG has made several visits to the Doral facility to determine any security issues. The OIG notes the following deficiencies: [REDACTED]

[REDACTED] ASD staff pointed out that access to the room is limited because the room is only accessible from other entry points that require keycard access. However, the OIG verified those other entry points have unlimited, unrestricted keycard access to most employees. [REDACTED]

[REDACTED] ASD veterinarians and veterinarian technicians advised the OIG that interruptions (e.g., employees opening the door) during procedures are very stressful to the animals and jeopardizes the safety of the employees. [REDACTED]

[REDACTED] ASD corrected this issue when it was brought to its attention.

The OIG also learned that there are no written protocols for [REDACTED] ASD has made some positive changes from the procedure used at the Medley facility. [REDACTED]

[REDACTED] The OIG observed during a visit on July 1, 2016 [REDACTED]

A similar problem was found to exist in the Medley facility before the move to Doral. During an unscheduled visit to the Medley facility, the OIG observed that [REDACTED]

[REDACTED] In fact, the OIG found that the log had not been updated in over a year, since September 23, 2014. [REDACTED]

[REDACTED] ASD states in its response to the OIG's draft report that it has addressed the nighttime security issues with its security company and ASD will be enforcing the procedures.

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The OIG also reviewed the security of controlled substances in the Medley facility and the Doral facility. A review of the controlled substance inventory maintained in the Medley facility pharmacy revealed a lack of segregation of duties, along with a failure to perform analysis of the demand for the inventory. The OIG found that the inventory clerk was the only person in the Medley facility who oversaw the drug control log, dispensed the drugs, inventoried the drugs, and reconciled the drug inventory. Any errors were corrected without independent review; and no reconciliation was performed of any inventories. The same individual was responsible for ordering and receiving the medications and controlled substances, reconciling the invoices to the items received, performing physical inventories of the controlled substances, and tracking the disbursement of controlled substances and other pharmaceuticals to the clinics and A Ward.

ASD has a procedure for controlled drugs, which addresses the management of the controlled substances and other medications inventory. The procedure calls for the ASD staff member responsible for the Drug Enforcement Administration license to conduct a physical inventory of all controlled substances at ASD annually. Interviews and a review of the controlled substance logs maintained in the pharmacy safe revealed that two physical inventories were performed prior to the move in 2016. Prior to those inventories, ASD had not conducted a physical inventory of controlled substances, in accordance with the procedure, since September 2012.

In addition, the pharmacy at the Medley facility was co-located with the storage room creating further security issues. [REDACTED] However, there is still no segregation of duties with regards to the control, dispensing, and inventory of drugs. ASD, as noted in its response, has taken some steps to segregate duties by having Inventory Clerks who physically receive the drugs verify the specific items delivered before turning over to the Pharmacy Clerk who reconciles the content with the order. For effective segregation of duties, ASD should ensure that employees with physical access to drugs should not be responsible for ordering and conducting physical inventories.

RECOMMENDATIONS ADDRESSING SECURITY OF FACILITIES & CONTROLLED SUBSTANCES

- 15) The OIG recommends that ASD make the following changes at the Doral facility:

[REDACTED]

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[REDACTED]

[REDACTED]

ASD Response and OIG rejoinder:

ASD has already made some of the recommended changes. [REDACTED]

[REDACTED]

The final recommendation, has been modified, taking into account the operational needs of the Department.

16) The OIG recommends that with regard to controlled substances, ASD should:

- a. Establish procedures restricting [REDACTED]
- b. Conduct physical inventories of controlled substances in the pharmacy at least annually and by an independent third party.

ASD Response and OIG rejoinder:

ASD does, as stated in its response, agree with the recommendations and has taken steps to ensure procedures are in place and followed for daytime and nighttime [REDACTED] Although disagreeing with the OIG's observation that there was no segregation of duties related to the inventory and dispensing of drugs, ASD, has taken some steps to segregate duties. The OIG recommendations are meant to ensure that employees with physical access to drugs should not be responsible for ordering and conducting physical inventories.

17) The OIG recommends that ASD perform periodic reconciliations of:

- a. The controlled substances on hand against the Euthanasia Logs.
- b. The controlled substance usage reported in the Euthanasia Log against the data entered in Chameleon.

ASD Response and OIG rejoinder:

ASD agrees and has developed a reconciliation process as to recommendation 17a. However, ASD does not believe a reconciliation of the data in Chameleon and the Euthanasia Log is of value. ASD will nonetheless research the matter "to determine if practical improvements are possible." The OIG believes that a

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reconciliation of the Euthanasia Log and Chameleon records is important in ensuring record information is correct.

H. ASD STAFFING

The OIG reviewed ASD staffing levels as it relates to the continued use of the Medley facility. The kennels at the Medley facility (both inside and outside) are still being utilized to shelter both cats and dogs. The Medley shelter is being used to shelter the animals that are scheduled to be "transported." The Medley shelter is also housing animals that may be contagious, in an effort to contain the spread of disease at the new facility. Animals that will be taken to community events or to Petco are also being transferred to the Medley shelter prior to their transport to events or Petco. Finally, animals impounded from hoarders are also being sheltered at Medley.

The continued use of the Medley facility impacts the collective kennel operations of ASD. Prior to the move, ASD had agreements with other kennel facilities to temporarily shelter animals designated for "transport" or "transfer" to rescue organizations. These agreements relieved the strain on the shelter to house animals for longer stays due to the No-Kill goal.

According to ASD, since the move to the Doral facility, as few as three (3) and as many as 90 animals could be housed at the Medley facility. While the use of the Medley shelter in this fashion may be a cost saving and space saving measure for ASD, it carries with it other operational concerns. [REDACTED]

The OIG has been assured that access to the Medley facility is restricted to ASD staff, and that any visitors to the facility must have a signed *Authorization to Enter the Shelter Form*.

Last, with regards to animals continued to be housed at the Medley facility, the OIG shared our concerns with ASD about the care and exercise of the animals. ASD did not have sufficient staff to attend to all the needs of the facility in Medley prior to the move to Doral. ASD relied heavily on volunteers to assist employees. For Fiscal Year 2016-2017 the kennel staff is budgeted at 63 positions. This is a 58% increase over the prior year's budgeted positions. Exhibit 9 contains the ASD Staffing Summary from the 2016-2017 budget. The increase in personnel is clearly needed to properly staff the new Doral facility. However, the limited staff resources must now provide care in two facilities. It is not clear that ASD can maintain adequate staffing levels to ensure the safety, care, and attention required to be given to sheltered animals simultaneously in two facilities.

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RECOMMENDATION ADDRESSING ASD STAFFING

- 18) The OIG recommends that ASD management reevaluate the use of the Medley facility until it can add Animal Care Specialists to adequately staff both facilities.

ASD Response and OIG rejoinder:

ASD agrees with the recommendation and "has already reassessed staffing levels...."

VIII. CONCLUSION

The solution to the problem of stray, lost, and abandoned animals requires a continuing commitment from the whole community; ASD's mandate as the County's safe harbor for the animals of the community is a monumental task. ASD has made some great strides in recent years to keep animals from entering or staying in the shelter. By implementing numerous programs to control the propagation of stray and abandoned pets and to find them permanent homes, ASD is establishing itself as a No-Kill Shelter. Throughout this review we have been cognizant of the challenges faced by ASD. This review has identified several areas for improvement. The recommendations are intended to enhance the continued safety and security of animals.