

# OFFICE OF AUDITS & ADVISORY SERVICES



## ANIMAL SERVICES AUDIT

### *FINAL AUDIT REPORT*

Chief of Audits: [Julie B. Nieminski, CPA, CIA, CFE, CISA, MPA](#)  
Senior Audit Manager: [Tom Philipp, CIA, CCSA](#)  
Senior Auditor: [Lindsey Heeszal, CPA, CIA, CFE](#)  
Auditor II: [Jenny Chen](#)

Intentionally Left Blank



# County of San Diego

**DONALD F. STEUER**  
CHIEF FINANCIAL OFFICER  
(619) 531-5413  
FAX (619) 531-5219

AUDITOR AND CONTROLLER  
1600 PACIFIC HIGHWAY STE 166, SAN DIEGO, CALIFORNIA 92101-2478

**TRACY M. SANDOVAL**  
ASST. CHIEF FINANCIAL OFFICER/  
AUDITOR & CONTROLLER  
(619) 531-5413  
FAX (619) 531-5219

August 21, 2012

TO: Dawn Danielson, Director  
Department of Animal Services

FROM: Julie B. Nieminski  
Chief of Audits

FINAL REPORT: ANIMAL SERVICES AUDIT

Enclosed is our report on the Animal Services Audit. We have reviewed your responses to our recommendations and have attached them to the audit report.

The actions taken and/or planned, in general, are responsive to the recommendations in the report. As required under Board Policy B-44, we respectfully request that you provide quarterly status reports on the implementation progress of the recommendations. The Office of Audits & Advisory Services will contact you or your designee near the end of each quarter to request your response.

Also attached is an example of the quarterly report that is required until all actions have been implemented. To obtain an electronic copy of this template, please contact Lindsey Heeszal at (858) 495-5576.

If you have any questions, please contact me at (858) 495-5661.

JULIE B. NIEMINSKI  
Chief of Audits

AUD:LCH:aps

Enclosure

c: David Estrella, Deputy Chief Administrative Officer, Community Services Group  
Donald F. Steuer, Chief Financial Officer  
Tracy M. Sandoval, Assistant Chief Financial Officer/Auditor and Controller  
Kaye Hobson, Group Finance Director, Community Services Group

## INTRODUCTION

---

**Audit Objective** The Office of Audits & Advisory Services (OAAS) completed an audit of Animal Services. The objective of the audit was to assess controls for ensuring compliance with applicable laws, regulations, and County policy associated with animal services, animal welfare, and animal shelters.

**Background** The Department of Animal Services (DAS) provides animal related law enforcement, sheltering, medical, and pet adoption services for the unincorporated areas of the County, as well as the cities of Carlsbad, Del Mar, Encinitas, San Diego, Santee, and Solana Beach. DAS operates three animal shelters. They are located in Carlsbad, central San Diego, and Bonita.

Each shelter employs Animal Care Attendants, Animal Service Representatives, Animal Control Officers, Registered Veterinary Technicians, and at least one Veterinarian on a rotational basis. The shelters work with contract veterinarians for after hour and emergency care as well as for cases where they do not have the necessary equipment or staff available. Each shelter also relies on assistance provided by volunteers.

The majority of the California laws relating to animal services, animal welfare, and animal shelters are in the Food and Agriculture Code and the Penal Code. Examples of items found in the laws include, but are not limited to, required holding periods, a requirement to scan all cats and dogs for a microchip prior to disposition (i.e., being adopted, sent to a rescue agency, or euthanasia), and a requirement to spay or neuter all unaltered cats and dogs before placing them in a home.

Chapter 752, Statutes of 1998 (Hayden Law) changed multiple sections of the Food and Agriculture Code. The most notable change was an increase in the required holding periods. In 2009, and each year since, the Hayden Law has been suspended, reverting the Food and Agriculture Code back to the pre-Hayden Law requirements.

DAS also has a Policy and Procedures Manual (DAS Manual) which incorporates California laws as well as best practices. These best practices include such things as how to prioritize patrol calls and how quickly each priority level must be addressed, how frequently to wash or sanitize a kennel, and how to properly handle animals.

DAS uses the Chameleon/CMS<sup>1</sup> (Chameleon) system to document all animal related information from the time a patrol call is made or an animal is received by the shelter through disposition.

---

<sup>1</sup> Chameleon/CMS is an integrated shelter software case management system for all aspects of an animal care facility. Chameleon/CMS is widely used in the animal shelter industry.

**Audit Scope & Limitations**

The scope of the audit focused on evaluating whether key controls are in place and operating effectively to maintain compliance with applicable laws, regulations, and County policy associated with animal services, animal welfare, and animal shelters.

This audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing prescribed by the Institute of Internal Auditors as required by California Government Code, Section 1236.

**Methodology**

OAAS performed the audit using the following methods:

- Reviewed laws, regulations, and policies related to animal services, animal welfare, and animal shelters to obtain an understanding of the process and requirements.
- Interviewed key personnel regarding applicable laws, regulations, and policies.
- Assessed the risks to achieving DAS's key compliance objectives independently and in coordination with DAS management.
- Conducted specific audit procedures (e.g., interviews, observations, and data analytics) on the following areas:
  - Animal holding periods.
  - Consistency of scanning for a microchip.
  - Percentage of cats and dogs reunited with owners.
  - Patrol call response times.
  - Reimbursement of costs received on seized animals.

## AUDIT RESULTS

---

**Summary**

Within the scope of the audit, there is reasonable assurance that DAS controls for ensuring compliance with applicable laws, regulations, and County policy associated with animal services, animal welfare, and animal shelters are generally adequate, except as noted in the findings below. Additionally, OAAS observed that DAS has a dog and cat reunite-with-owner rate that is above the national average.

To further strengthen controls, OAAS has the following findings and related recommendations.

**Finding I:****DAS Uses Discretion in Complying with Specific Laws**

DAS uses some discretion when following certain California Food and Agriculture codes. This includes required hold times and scanning for microchips.

- **Hold Times**

California Food and Agriculture Codes § 31108 and § 31752 require that all dogs and cats be held for 72 hours. However, based on data

gathered from Chameleon and from interviews with DAS management, it is DAS's practice to allow stray cats, particularly younger stray cats, to be adopted prior to the 72 hour period. In addition, when an overcrowding condition exists, it is DAS's practice to allow for euthanasia of certain dogs and cats with serious contagious treatable or manageable medical conditions.

- **Microchip Scanning**

California Food and Agriculture Codes § 31108(c) and § 31752(c) requires that all cats and dogs should be scanned for a microchip prior to disposition. It is DAS's policy and practice to scan all animals prior to euthanasia or adoption. However, in some cases where an animal is brought to the shelter by the owner requesting immediate euthanasia, the animal may not be scanned for a microchip prior to euthanasia if the animal is suffering.

Additionally, DAS's policy requires personnel to document (in Chameleon) that the animal was scanned for a microchip. However, this documentation is only required by DAS's policy during the intake process. When an animal is dangerous to handle and represents a significant safety hazard for DAS employees, the animal may not be scanned at intake. In these cases, the animal's record in Chameleon may not reflect that the animal was scanned prior to disposition or provide evidence of compliance with the Code.

DAS believes that in certain cases the use of discretion in following applicable laws is appropriate to ensure the overall welfare of the animal population under custody and to ensure the safety of DAS employees. However, authority to deviate from state standards could not be provided.

**Recommendation:**

In order to be in compliance with applicable laws, DAS should:

1. Comply with all applicable California laws or seek legislative change that would allow for exercise of discretion when implementing certain laws.
2. Update their policy to require DAS personnel to record in Chameleon each time they scan an animal for a microchip, rather than only at intake.

**Finding II:**

**Safety Hazards Observed at the Bonita Dog Kennels**

The Bonita dog kennels were built in the early 1970's and are in need of continuous repairs. The following conditions in and near the Bonita dog kennels were observed that could present a safety hazard to employees and the public:

- Some kennel bars were either missing or bent in the non-public area of the kennels. As a result, a large dog could reach through the gap and bite a nearby employee or volunteer.

- There are gutters in front of the kennels on the public side. In some instances, the covers to these gutters were either missing or left open. As a result, an individual could accidentally step into the gutter and injure themselves.

DAS management has acknowledged the deteriorating condition of the Bonita kennels and the need for more frequent repairs and has either repaired or is in the process of repairing the items noted above. Going forward, timely repairs should be made to the kennels to keep them safe.

**Recommendation:**

In order to improve the safety of the Bonita dog kennels, DAS should:

1. Implement a procedure to ensure timely identification and repair of maintenance needs that could represent a safety hazard. This could include a work order log or other tool that will allow staff to request repairs and management to track the progress of repairs.
2. Consider upgrading or replacing the kennels in order to provide a more permanent solution.

Office of Audits & Advisory Services

C

R

E

A

T

E

VALUE

## **DEPARTMENT'S RESPONSE**



# County of San Diego

**DAWN DANIELSON, RVT**  
DIRECTOR

**DEPARTMENT OF ANIMAL SERVICES**  
5480 GAINES STREET, SAN DIEGO, CA 92110-2687

OFFICE: (619) 767-2605  
FAX: (619) 767-2706  
WEBSITE: www.sddac.com  
MAIL STOP: H-39

RECEIVED

AUG 20 2012

OFFICE OF AUDITS &  
ADVISORY SERVICES

August 16, 2012

TO: Julie B. Nieminski, Chief of Audits  
Auditor and Controller, Office of Audits & Advisory Services (MS: O-305)

FROM: Dawn Danielson, RVT, Director  
Department of Animal Services (MS: H-39)

### DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: ANIMAL SERVICES AUDIT

**Finding I:** DAS Uses Discretion in Complying with Specific Laws

**OAAS Recommendation:**

*In order to be in compliance with applicable laws, DAS should:*

1. *Comply with all applicable California laws or seek legislative change that would allow for exercise of discretion when implementing certain laws.*
2. *Update their policy to require DAS personnel to record in Chameleon each time they scan an animal for a microchip, rather than only at intake.*

**Action Plan:**

1. DAS will be working with statewide animal control/humane organizations to propose clarifying language and/or provide specific local discretion in state laws. California Food and Agricultural Code (F&A), section 17005 states, in part, that it is the policy of the State to avoid euthanasia of adoptable/treatable animals. F&A 17006 authorizes the euthanasia of "newborn animals that need maternal care." DAS placed young animals into adoptive homes prior to the holding date to avoid the absurd outcome of euthanizing an animal when a (foster) home is available.

Until such statewide changes are made, we will identify these animals as being on "foster status" where they remain in our inventory (subject to return to the shelter should an owner be identified) until the animal can be permanently dispositioned to a permanent home after the hold date expires.

Further, State policy specifically directs that "reasonable effort" should be made to return animals to a healthy status. In the case of certain types of contagious or infectious diseases, it is not "reasonable" to maintain the animals in a shelter environment due to the probable spread of disease and/or contamination throughout the shelter.



TO PROTECT THE HEALTH, SAFETY AND WELFARE OF PEOPLE AND ANIMALS



Department Response to Audit Recommendations: Animal Services  
August 16, 2012  
Page 2 of 3

Each shelter has limited isolation capabilities and specific diseases such as Sarcoptic mange and Dermatophytosis ( Ringworm) are not only contagious to other animals, but have significant zoonotic potential to humans. Canine and feline viral diseases such as Distemper and Parvovirus are highly contagious and easily spread through daily contact. Unless hospitalization with intensive therapy occurs, the mortality rate in these diseases can exceed 50%. During times of high inventory and overcrowding, the medical needs and isolation requirement of these cases cannot be met, therefore, animals may be humanely euthanized before their hold date.

2. All staff has been apprised of the requirement to note microchip scanning in conformance with state requirements and to ensure the records are correctly updated.

**Planned Completion Date:**

1. Immediately.
2. September 30, 2012

**Contact Information for Implementation:** Dan DeSousa, Deputy Director

**Finding II:** Safety Hazards Observed at the Bonita Dog Kennels

**OAAS Recommendation:**

*In order to improve the safety of the Bonita dog kennels, DAS should:*

1. *Implement a procedure to ensure timely identification and repair of maintenance needs that could represent a safety hazard. This could include a work order log or other tool that will allow staff to request repairs and management to track the progress of repairs.*
2. *Consider upgrading or replacing the kennels in order to provide a more permanent solution.*

**Action Plan:**

1. While the Department of General Services (DGS) has a computer-based maintenance reporting system (Tririga), it does not permit sharing information with multiple supervisors or other employees. Therefore, DAS will implement a manual system to share reporting and status information to all appropriate site supervisors. This manual log will allow all staff to report facility concerns so that those issues can be timely and properly forwarded to DGS for resolution.
2. Future development plans for the animal shelter in Bonita have already been made which will include replacement of existing dog kennels. This concern has been identified in the Capital Improvement Needs Assessment (CINA). However, implementation of this capital improvement is contingent upon available funding which is currently estimated at \$5.5 million.

Department Response to Audit Recommendations: Animal Services  
August 16, 2012  
Page 3 of 3

**Planned Completion Date:**

1. September 30, 2012.
2. FY 2017-18

**Contact Information for Implementation:** Randall Krogman, Administrative Services Manager II.

If you have any other questions, please contact me at (619) 767-2605.



DAWN DANIELSON, RVT, Director  
Department of Animal Services

DD:mlo

cc: Tom Philipp, Senior Audit Manager, Auditor and Controller  
Lindsey Heeszel, Senior Auditor, Auditor and Controller  
George Seikaly, Senior Deputy County Counsel, Office of the County Counsel  
Kaye Hobson, Group Finance Director, Community Services Group  
Dan DeSousa, Deputy Director, Department of Animal Services  
Randall Krogman, Admin. Services Manager II, Department of Animal Services