



# DEPARTMENT OF ANIMAL SERVICES EUTHANASIA PRACTICES

## *FINAL REPORT*

Chief of Audits: Juan R. Perez  
Audit Manager: Laura R. Flores, CIA, CFE, CGAP  
Senior Auditor: Ronald Cosey, CGAP  
Auditor I: Erich Hannon, CGAP

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# County of San Diego

**TRACY M. SANDOVAL**  
DEPUTY CHIEF ADMINISTRATIVE OFFICER/  
AUDITOR AND CONTROLLER

AUDITOR AND CONTROLLER  
OFFICE OF AUDITS & ADVISORY SERVICES  
5530 OVERLAND AVENUE, SUITE 330, SAN DIEGO, CA 92123-1261  
Phone: (858) 495-5991

**JUAN R. PEREZ**  
CHIEF OF AUDITS

June 22, 2017

TO: Dan DeSousa, Director  
Department of Animal Services

FROM: Juan R. Perez  
Chief of Audits

FINAL REPORT: DEPARTMENT OF ANIMAL SERVICES EUTHANASIA PRACTICES

Enclosed is our report on the Department of Animal Services Euthanasia Practices. We have reviewed your response to our recommendations and have attached it to the audit report.

The actions taken and/or planned, in general, are responsive to the recommendations in the report. As required under Board of Supervisors Policy B-44, we respectfully request that you provide quarterly status reports on the implementation progress of the recommendations. You or your designee will receive email notifications when these quarterly updates are due, and these notifications will continue until all actions have been implemented.

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

JUAN R. PEREZ  
Chief of Audits

AUD:RC:nb

Enclosure

c: April Heinze, Deputy Chief Administrative Officer, Community Services Group  
Tracy M. Sandoval, Deputy Chief Administrative Officer/Auditor and Controller  
Brian Hagerty, Group Finance Director, Community Services Group

## INTRODUCTION

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### **Audit Objective**

The Office of Audits & Advisory Services (OAAS) completed an audit of the Department of Animal Services' (DAS) Euthanasia practices. The objective of the audit was to assess the adequacy of departmental euthanasia procedures and determine compliance with applicable regulations.

### **Background**

DAS protects the public from dangerous animals, protects animals from abuse and neglect, and saves the lives of thousands of unwanted, abandoned or lost pets each year. Approximately 25,000 animals enter DAS' three shelters annually. DAS provides animal-related law enforcement, sheltering, medical and pet adoption services to the unincorporated area of the County and, by contract, to the cities of San Diego, Carlsbad, Del Mar, Encinitas, Santee and Solana Beach.

DAS, as an animal sheltering agency, is mandated by State law to provide humane death for animals that are irremediably suffering or have a medical condition that cannot be treated with reasonable efforts, animals with a behavioral or temperamental defect that could pose a safety risk, and animals whose owners requests euthanasia. Euthanasia is the practice of intentionally ending the life of an animal through a painless and merciful or "humane" method. California Civil Code 1834.4 (a) and (b) state that it is the policy of the State that no adoptable or treatable animal should be euthanized. Adoptable animals include only those that are eight weeks or older at the time or subsequent to the time it is taken into possession, have no signs of behavioral and temperamental defect that could pose a safety risk or otherwise make the animal unsuitable for placement as a pet, and have no sign of disease, injury or hereditary condition that adversely affects the animal's health. Treatable animals include any animal that is not adoptable but that could become adoptable with reasonable efforts.

To guide staff and volunteers and inform external interest groups (e.g. animal welfare and adoption organizations), DAS has developed a comprehensive Euthanasia Reduction Policy. The policy includes definitions that are used to categorize animals in the shelter:

- **Healthy/Friendly Animals** – Are those animals eight weeks of age or older. They are healthy, well socialized, and need no medical attention. These animals have not manifested a sign of behavioral or temperamental condition that would pose a safety risk.
- **Manageable Animals** – Are those animals found to have a chronic behavioral or medical, congenital or hereditary condition that poses no significant health or safety risk to itself, other animals or the public and typically requires ongoing treatment to maintain a satisfactory quality of life. All unclaimed animals categorized as healthy/friendly, treatable or manageable are made available for adoption.

- **Non-Rehabilitatable Animals** – Are those animals irremediably suffering from a serious illness or severe injuries, have a poor prognosis or protracted painful recovery, or are afflicted with some significant behavioral or medical condition that is not likely to be satisfactorily remedied or managed with reasonable efforts.
- **Behavior-Potential Safety Risk** – Are those animals that have a documented history of aggressive behavior toward a person or animal. Regulated animals are prohibited or disqualified for adoption by law, regulation or policy.
- **Owner-Requested Euthanasia** – Owners may sign a written request to have their animals euthanized for a fee.

The Euthanasia Reduction Policy also includes detailed components on medical and behavioral assessment of animals, specific staff guidelines on euthanasia decision-making, and safeguards to prevent the inadvertent euthanasia of healthy, friendly animals. One of DAS' objectives is to achieve a goal of 0% euthanasia of any healthy, friendly animal by reuniting lost pets with their owners or through adoption to a new family. Another objective is to ensure that 0% of treatable animals that come into their shelter are euthanized, by providing medical care when resources allow and placing animals with rescue partners or adopters.

#### **Audit Scope and Limitations**

The scope of the audit included a review of DAS' euthanasia procedures during fiscal year 2015-16 to current.

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 state laws and regulations, County ordinances, as well as departmental policies and procedures related to euthanasia procedures.
- Reviewed medical and behavioral memos and handling notes recorded in the department's database to determine whether animal assessment was conducted prior to euthanasia.
- Observed pre-euthanasia procedures conducted by DAS to ensure proper identification of animals approved for euthanasia.
- Reviewed employee training files and inspected euthanasia certification documents to verify that staff was trained on specific euthanasia training techniques.

- Performed analytical procedures of data from the department's database to determine the accuracy of DAS' live release rate and euthanasia statistics.
- Inspected adoption records of dogs with behavioral or temperamental defects to determine if their fractious history was communicated to prospective owners.

## AUDIT RESULTS

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### Summary

Within the scope of the audit, DAS has established adequate euthanasia procedures and is in compliance with applicable laws and regulations. However, some improvements could be made to enhance the controls over DAS' euthanasia practices.

### Finding I:

#### **Inconsistent Communication and Documentation for Adopted Dogs with Behavior-Potential Safety Risk**

OAAS reviewed the records of adopted dogs with recorded behavior-potential safety risks. Audit test found that DAS does not consistently document communication of behavioral issues to prospective pet owners. Specifically, we noted the following:

- 1 of the 4 records tested had no evidence that the dog's temperament was communicated to the prospective owner prior to adoption.
- 2 of the 4 records tested had incorrect information recorded in the system. One dog was incorrectly classified as an adoption when, in fact, it was an owner relinquishment and was subsequently euthanized. The other dog was returned from the new adopter with aggressive behavior, which had not been previously noticed, and was subsequently euthanized.
- 1 of the 4 records tested had documented evidence that DAS clearly communicated the dog's behavior to the prospective owner prior to adoption by noting the discussions between DAS staff and the prospective owner.

DAS has not established a formal process for staff to consistently ensure that behavioral concerns of dogs are properly communicated and documented prior to adoption.

According to DAS' Policies and Procedures Manual – 4.11 Euthanasia Reduction Procedures, animals that are considered a potential safety risk are generally not available to the public. If full disclosure of a dog's fractious past is not provided to a prospective owner, it could pose a potential safety risk to the owner or the owner's family or pets, increasing liability to the County.

**Recommendation:** To minimize the safety risk to the public when adopting an animal with behavioral concerns, DAS should:

1. Revise their policies to include a process to communicate the animal's behavioral concerns to prospective owners. This should include, but not be limited to, ensuring that prospective owners acknowledge the animal's behavioral issues prior to adopting it; and
2. Properly train DAS staff responsible for processing adoptions to ensure that they are aware of the revised policies.

**Finding II:**

**Animal Assessments for Owner Requested Euthanasia Are Not Always Documented**

DAS staff did not consistently document the initial assessment of the animals that were euthanized based on the owners' request. OAAS tested a sample of 30 euthanized animals to determine whether sufficient documentation of the authorization to euthanize the animal was recorded. Of the 30 animals tested, 13 were euthanized based on the owner request. During our test, we noted that 10 of the 13 animals euthanized at the owner's request had either no documentation or insufficient documentation to support the animal's initial assessment.

In accordance with DAS' Policies and Procedures Manual, 4.6 Euthanasia Reduction Policy, the assessment of each animal that is euthanized should be properly documented and categorized to provide the public with accurate information on the disposition of animals and properly report euthanasia statistics in context. Additionally, owner-requested animals that are deemed healthy or friendly will normally be held and made available for adoption as a relinquished animal despite the owners request for euthanasia.

While the policy provides limited guidance on owner-requested euthanasia, it does not specify the extent of the initial assessment or how to document the assessment prior to making the determination to euthanize an animal. Absence of detailed policies for owner requested euthanasia that includes adequate documentation, results in insufficient evidence of how the determination was made, and increases the risk that healthy, treatable, and friendly animals are euthanized.

**Recommendation:** To ensure that no healthy, friendly or treatable animal is euthanized, DAS should:

1. Revise their euthanasia procedures to clearly specify the requirements to conduct and document the initial assessment of animals for owner-requested euthanasia.

**Finding III:**

**Euthanasia Training Certifications Were Missing From Employees' Files**

Pursuant to California Code of Regulations, Title 16, Section 2039, an employee of an animal control shelter who is not a veterinarian or a registered veterinary technician (RVT) should receive proper training

to administer sodium pentobarbital for euthanasia. Further, re-certification should be conducted annually and copies of the certification should be included in the employees' personnel file according to DAS' Euthanasia Certification Policy.

OAAS selected a sample of 15 files of employees authorized to perform euthanasia, other than a veterinarian or a RVT. OAAS tested the sample to determine whether the files contained a copy of the employees' current euthanasia certification and whether employees were re-certified annually. Our test revealed the following:

- 8 of the 15 employee files had no certification to support the employee's training.
- 14 of the 15 files did not contain the previous certifications as required; therefore, OAAS could not validate that the employees were re-certified within a year.
- 1 of the 15 employees was re-certified 14 months from the previous certification, not annually as required.

According to DAS management, the missing documents were attributed to insufficient oversight of the certification process. As a result, DAS cannot demonstrate its compliance with euthanasia training requirements as established by California regulations.

**Recommendation:** To increase compliance with euthanasia training requirements, DAS should ensure that:

1. Staff responsible for performing euthanasia procedures is properly trained and that annual re-certification is conducted; and
2. Adequate documentation is retained in the employees' files to demonstrate that they received the required euthanasia training.

## Office of Audits & Advisory Services

Compliance

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**DEPARTMENT'S RESPONSE**  
**(DEPARTMENT OF ANIMAL SERVICES)**



# County of San Diego

**DANIEL E. DESOUSA, CAWA**  
DIRECTOR

**DEPARTMENT OF ANIMAL SERVICES**  
5480 GAINES STREET, SAN DIEGO, CA 92110-2624  
619-767-2805 • FAX 619-767-2706  
WWW.SDDAC.COM

June 9, 2017

RECEIVED

**TO: Juan R. Perez**  
Chief of Audits

JUN 14 2017

OFFICE OF AUDITS &  
ADVISORY SERVICES

**FROM: Daniel E. DeSousa, CAWA, Director**  
Department of Animal Services

## DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: DEPARTMENT OF ANIMAL SERVICES EUTHANASIA PRACTICES

### **Finding 1: Inconsistent Communication and Documentation for Adopted Dogs with Behavior-Potential Safety Risk**

**OAAS Recommendation 1:** To minimize the safety risk to the public when adopting an animal with behavioral concerns, DAS should:

1. Revise their policies to include a process to communicate the animal's behavioral concerns to prospective owners. This should include, but not be limited to, ensuring that prospective owners acknowledge the animal's behavioral issues prior to adopting it; and
2. Properly train DAS staff responsible for processing adoptions to ensure that they are aware of the revised policies.

**Action Plan:** The Department agrees with this finding. DAS currently captures notes regarding a dog's behavior in memos stored in the Chameleon database and will create a Chameleon computer report to capture all behavior memos. Those entries will be included in an acknowledgement of behaviors for a potential adopter to review prior to adoption. DAS staff will be trained in the printing and issuance of the acknowledgement to the potential adopter.

**Planned Completion Date:** September 1, 2017.

**Contact Information for Implementation:** Daniel E. DeSousa, CAWA, Director



**Finding II: Animal Assessments for Owner Requested Euthanasia Are Not Always Documented**

**OAAS Recommendation 1:** To ensure that no healthy, friendly or treatable animal is euthanized, DAS should revise their euthanasia procedures to clearly specify the requirements to conduct and document the initial assessment of animals for owner-requested euthanasia.

**Action Plan:** DAS disagrees with this finding. The Department already has a policy (4.11.2) regarding owner requested euthanasia of animals which reads, in part, as follows:

**Note regarding owner requested euthanasia:** Owner requests for animal euthanasia that involve questionable circumstances, an inadequate reason, or an healthy/friendly animal, should be brought to the attention of a supervisor for review. If staff disagree with the reason for euthanasia (which the owner must indicate on the relinquishment form) then the animal would not be euthanized despite the owner's request.

DAS will amend its existing policy (4.11.2) to reflect that, absent any other computer entries contesting the requested euthanasia, the Department agrees with the reason for the euthanasia.

**Planned Completion Date:** July 1, 2017.

**Contact Information for Implementation:** Daniel E. DeSousa, CAWA, Director

**Finding III: Euthanasia Training Certifications Were Missing From Employees' Files**

**OAAS Recommendation 1:** To increase compliance with euthanasia training requirements, DAS should ensure that:

1. Staff responsible for performing euthanasia procedures is properly trained and that annual re-certification is conducted; and
2. Adequate documentation is retained in the employees' files to demonstrate that they received the required euthanasia training.

**Action Plan:** DAS agrees with this finding. DAS has already certified all staff that could be called upon to euthanize an animal and documentation has been placed in each employee's file. In addition, DAS has implemented steps to ensure that all staff that perform euthanasia are recertified on a set schedule.

**Planned Completion Date:** Completed

**Contact Information for Implementation:** Daniel E. DeSousa, CAWA, Director

If you have any questions, please contact me at 619.767.2766.



Daniel E. DeSousa, CAWA  
Director  
DDS:mlo

**Office Of Audits & Advisory Services  
Animal Services (A17-013)  
Rebuttal to the Department's Response**

**Finding II – Recommendation 1:** Although OAAS acknowledges that the department has a policy regarding owner-requested euthanasia, we stand by our finding and recommendation. The policy does not direct staff on the extent of the initial assessment and how to document it in the system. OAAS is not disputing whether DAS has a policy in place; rather, OAAS is recommending that DAS clearly and consistently document the basis for making the decision to euthanize animals per owner-request, and include the documentation requirement in the DAS policy or procedure manual. The proposed amendment to the policy described in the DAS response would not be sufficient for DAS to demonstrate that it does not euthanize animals that are friendly, healthy, and treatable.