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Audit Report

**AUDIT OF DALLAS ANIMAL SERVICES
OPERATIONS**

(Report No. A17-003)

December 9, 2016

City Auditor

Craig D. Kinton

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Executive Summary

Dallas Animal Services (DAS) operations, a Division within the Department of Code Compliance (CODE), have been a high priority in the City of Dallas (City) for years. Following loose dog attacks that included the tragic death of a City resident in May 2016, the City engaged Boston Consulting Group (BCG) to analyze the loose dog problem and develop a strategic plan for improvement.

In August 2016, BCG published a report identifying seven main recommendations for addressing the loose dog problem (see Appendix I). The City has already begun acting on those recommendations by approving a new mission statement for DAS, assigning Deputy Chief of Police Robert Sherwin as a direct report to the City Manager to lead DAS, and developing a Task Force to oversee implementing the improvements¹.

This performance audit, initiated prior to the City's engagement with BCG, showed DAS needs to improve internal controls to ensure DAS is meeting operational objectives as follows:

- The DAS is not consistently meeting its on-time response goals for three types of high priority calls (see textbox on page 6). As a result, City residents depending on DAS for urgent assistance can be left waiting longer than expected.
- The DAS' Chameleon Shelter Case Management System (Chameleon System) does not have sufficient controls to ensure data is reliable (complete, accurate, or secured). In addition: (1) priority levels / category definitions are not consistent; (2) monitoring procedures are not established; and, (3) Chameleon System reports needed to analyze call response times are limited. As a result, DAS' ability to accurately analyze and improve its call time response is restricted.
- The DAS does not have formal (written, approved, and dated) policies and procedures related to call response timeliness or management review of call response timeliness. The DAS has documented its priorities for calls based on the type of call; however, this information is not included in formal policies and procedures. Without formal policies and procedures, DAS cannot ensure effective controls are in place and that DAS personnel are performing their duties consistently to meet goals for call time response.

Background Summary

The DAS operates the City's animal shelter and responds to animal-related calls for service. In response to concerns about the adequacy of its services and personnel, the budget of DAS has increased 58 percent, from \$7,979,512 in Fiscal Year (FY) 2014 to \$12,608,171 in FY 2017.

The DAS admitted 28,430 animals in FY 2016, including those brought in by the community, surrendered by owners, or picked up in the field. The DAS responds to calls for service primarily through the Management Services / 311 Customer Service Center (311). In FY 2016, DAS responded to 51,392 calls for service.

Source: City budget documents, the BCG report, a City Manager memorandum, and the September 2016 DAS Department Fact Sheet

¹ The City Manager has since appointed Major of Police Barbara L. Hobbs to lead DAS.

A very small percentage of the dogs who bite or attack people in the City are determined to be Dangerous Dogs as defined by a State of Texas (State) mandated program. State law requires a sworn statement from any witnesses requesting the dog be considered a Dangerous Dog, but most witnesses do not submit the statement. As a result, the City's Dangerous Dog Program has limited effectiveness protecting the community.

**Dangerous Dog Program
Requires Affidavits**

Receipt of sworn statements from any witnesses of the attack is needed to pursue a Dangerous Dog investigation.

Source: Texas Health & Safety Code Chapter 822 Subchapter D Section 822.0421 and City Code Chapter 7, Section 7-5.3 (a)

- The CODE's policies and procedures for the oversight of active dangerous dog cases are inadequate. Specifically, CODE does not have policies and procedures for: (1) monitoring compliance with the Dangerous Dog Program's requirements; (2) the Dangerous Dog Coordinator's roles and responsibilities; and, (3) how often the CODE's inspections of active dangerous dog cases are to be performed, including how the inspection report is to be maintained and who is responsible for performing the inspections. As a result, there is increased risk dangerous dogs are not adequately monitored and compliance with the Dangerous Dog Program requirements are not enforced consistently.
- The DAS does not have consistent inventory practices, documented policies and procedures, and adequate segregation of duties among the DAS personnel able to dispense drugs and those who perform inventory monitoring. The DAS also does not have policies and procedures in place to ensure that expired drugs, including controlled substances, were identified, separated, not used, and disposed of properly. While animal shelters need controlled substances to operate, without appropriate policies and procedures in place there is an increased risk: (1) controlled substances are subject to misuse (sale or diverted for personal use) without detection; and, (2) the DAS could inadvertently use drugs that are less effective to treat animals.
- The DAS surveillance camera system management is inadequate, and DAS personnel responsible for managing the surveillance camera system have not received training. As a result, surveillance cameras may not be working when needed, theft or misuse can occur undetected, and the video may not be available to review after the fact.
- Access to restricted areas is not properly controlled. As a result, there is an increased risk that unauthorized access to restricted areas will occur without detection.
- The DAS generally complies with most of the Association of Shelter Veterinarians' Guidelines for Standards of Care in Animal Shelters (Guidelines); however, seven Guidelines were not implemented and the DAS policies and procedures do not specifically address 55 of the 98 Guidelines reviewed (see Table I on page 21). In addition, in a June 22, 2016 survey of 14 DAS personnel, seven either said they could not find the DAS policies and procedures or said they were available in an

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incorrect location. As a result, DAS personnel may not consistently apply Guidelines for standards of care.

- The DAS does not have policies and procedures to ensure DAS personnel are up-to-date on State mandated training for Animal Service Officers and the performance of euthanasia. The spreadsheet DAS uses to track compliance with euthanasia training did not include six active Animal Service Officers. While no DAS personnel actually performing euthanasia were found to be out of compliance with euthanasia training requirements, there is greater risk DAS personnel could fall out of compliance if there are no policies and procedures for training.
- From calendar years 2012 through 2014, DAS did not employ a veterinarian to conduct an annual veterinarian inspection of DAS in compliance with the State Health and Safety Code. The 2015 inspection was performed on November 10, 2015 by the DAS Operations Manager, a licensed veterinarian, after an audit request for the documentation. As a result, the City had not been in compliance with Standards for Animal Shelters' requirements until the audit.

The CODE identified a drug inventory management system as a DAS need in both the 2014 and 2015 self-assessments performed to comply with AD 4-09 *Internal Control*, but DAS had not fully implemented its efforts. During the course of the audit, DAS developed and released new or revised policies and procedures, demonstrating an effort to improve internal controls in several of the areas audited.

We recommend the City Manager improves DAS internal controls by implementing the recommendations contained in this report.

The audit objective was to evaluate Animal Services operations which include: (1) animal kennel care; (2) call response times; and, (3) drug inventory management compared to best practices and determine whether they comply with applicable laws, regulations, and policies. The objective was further expanded to also include the Dangerous Dog Program. The audit period covered Fiscal Years (FY) 2015 and 2016. We also evaluated certain related transactions and records before and after that period.

Management's response to this report is included as Appendix V.

Audit Results

Overall Conclusions

The Dallas Animal Services (DAS) needs to improve internal controls to ensure DAS is meeting operational objectives as follows:

- The DAS is not consistently meeting its on-time response goals for three types of high priority calls and the Chameleon Shelter Case Management System does not have sufficient controls to ensure data is reliable (complete, accurate, or secured).
- A very small percentage of the dogs who bite or attack people in the City of Dallas (City) and other Texas cities are determined to be Dangerous Dogs as defined by a State of Texas (State) mandated program. There are four contributing factors, including the State law design, limited public outreach, insufficient policies and procedures, and inadequate coordination and communication between the CODE divisions responsible for reviewing dog bite information.
- Controlled substances were not properly accounted for and expired drugs were used after their expiration dates. The DAS does not have consistent inventory practices, documented policies and procedures, and adequate segregation of duties among the DAS personnel able to dispense drugs and those who perform inventory monitoring.
- The DAS surveillance camera system management is inadequate and access to restricted areas is not properly controlled.
- The DAS generally complies with most of the Association of Shelter Veterinarians' Guidelines for Standards of Care in Animal Shelters (Guidelines); however, seven Guidelines were not implemented and the DAS policies and procedures do not specifically address 55 of the 98 Guidelines reviewed (see Table I on page 21).
- The DAS does not have policies and procedures to ensure DAS personnel are up-to-date on State mandated training for Animal Service Officers and the performance of euthanasia. From calendar years 2012 through 2014, DAS did not comply with the State law requirement to employ a veterinarian to conduct an annual inspection of the shelter.

Dallas Animal Services Does Not Consistently Respond On Time to High Priority Calls

The DAS is not consistently meeting its on-time response goals for the three types of high priority calls (see textbox). As a result, City of Dallas (City) residents depending on DAS for urgent assistance can be left waiting longer than expected.

In addition, call response times for the highest priority calls are not evenly spread throughout the City. For example, District 4 *Person in Danger* calls were less likely to be answered on time than the 58 percent average for the City overall. District 4 received the most *Person in Danger* calls (224) during the period which was almost as many as the 227 *Person in Danger* calls received in Districts 9, 10, 11, 12, 13, and 14 combined (see Appendix II for more information about call response time information).

Response Time Goals	
The response time compares the time the Animal Service Officer arrived on scene to the call time.	
Priority Call Type	Goals
Person in Danger	
Most calls	One hour
Wild animal calls	Two hours
Assist calls	Three hours
Animal in Danger	
All calls	Two hours
Urgent	
Loose animal calls	Four hours
Other urgent calls	Six hours
The response time after dispatch compares the time the Animal Service Officer arrived on scene to the time the officer was dispatched to the scene.	
Source: Office of the City Auditor analysis of DAS internal priority document	

Auditors analyzed 7,466 completed calls between March 1, 2016 and July 25, 2016². Calls without the arrival time were not included. Response time analysis comparing the response to the initial call time shows on-time performance by call type:

- 762 of 1,317, or 58 percent, of the *Person in Danger* call responses were on time
- 685 of 944, or 73 percent, of the *Animal in Danger* call responses were on time
- 3,122 of 3,487, or 90 percent, of the loose animal *Urgent* call responses were on time
- 881 of 1,718, or 51 percent, of the other *Urgent* call responses were on time

Response rates were higher when only considering timeliness compared to the time the Animal Service Officer was dispatched as shown below:

- 78 percent of the *Person in Danger* call responses were on time

² Data reliability concerns were identified for call time performance data used to perform this analysis as a result of an issue in the Chameleon System design, some call response times are overwritten when a follow-up activity on the original call occurs. The data was used to analyze call time response because it is the only information available.

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- 87 percent of *Animal in Danger* call responses were on time
- 97 percent of loose animal *Urgent* call responses were on time
- 95 percent of other *Urgent* call responses were on time

The DAS is not reviewing call time response information because: (1) DAS does not have access to review call time response information for the City as a whole; (2) there are no Chameleon System reports that allow DAS to review response times on a DAS organization-wide level; and, (3) there appear to be delays in the dispatch time recorded in the Citizen Request Management System (CRMS) used by Management Services / 311 Customer Service Center (311). In addition, there are no formal policies and procedures related to call response timeliness or periodic review of call response timeliness. The DAS also does not use routing software to expedite the response to calls. The Field Force software DAS currently uses does not have this capability.

The International City / County Management Association ICMA Knowledge Network posted a February 2010 report which identified several recommendations for animal services operations related to call response time management. The February 2010 *Animal Services Department Business Process Review* – Miami Dade County Office of Strategic Business Management report recommended:

- Tracking and monitoring call response times
- Reporting and monitoring call productivity
- Using routing software to minimize travel time between calls

Recommendation I

We recommend the City Manager ensures DAS reviews and tracks call response times to improve the timeliness of high priority call responses, including: (1) tracking and monitoring call response times; (2) reporting and monitoring call productivity; and, (3) obtaining and using routing software to minimize travel time between calls.

Please see Appendix V for management's response to the recommendation.

Controls Are Not Sufficient to Ensure Data Reliability and Adequate Call Response Time Monitoring

The DAS' Chameleon System does not have sufficient controls to ensure data is reliable (complete, accurate, or secured). In addition: (1) priority levels / category definitions are not consistent; (2) monitoring procedures are not established; and, (3) Chameleon System reports needed to analyze call response times are limited. As a result, DAS' ability to accurately analyze and improve its call time response is restricted as follows:

- An issue in the Chameleon System design allows a later action to overwrite the information on an earlier record, making calls appear to have been answered hours, days, or weeks after an initial call response.
- The call times are not directly available within the Chameleon System. The call times must be separately extracted from the 311 CRMS to compare the response time to the call time.
- The DAS call response time goals, included in a November 4, 2015 memo distributed to the Animal Service Officers, have eight priority levels (Level 1, Level 2, Level 3, etc.) each with its own on-time goal. In contrast, the priority categories within the data are defined as *Person in Danger*, *Animal in Danger*, and *Urgent*, making it difficult to compare performance to goals without making certain assumptions regarding how the eight priority levels correspond to the actual data.
- There are no Chameleon System reports that allow DAS to review call response times on an organization-wide level.
- The available Chameleon System reports cannot be provided by City Council district, area of the City, or City-wide.

Data Reliability

The United States Government Accountability Office (GAO) says system controls should provide reasonable assurance of the following:

Completeness – All transactions that occurred are entered into the system, processed only once, and properly included in outputs

Accuracy – Activity is properly recorded, data elements are accurate, and outputs are accurate

Security – Application data and reports and other output are protected against unauthorized access

Source: GAO 2014 Standards for Internal Control in the Federal Government

The Chameleon System relies on manual entry with no data validation checks when obviously inaccurate information is entered into the system. There are also no password security rules in place.

Although the Chameleon System allows DAS to limit user access to the functions suitable for employee job responsibilities, DAS does not conduct regular monitoring reviews to ensure the users' access are still appropriate. In addition, there are no monitoring procedures either by DAS or the Department of Communications and Information Services (CIS) to detect data reliability issues.

The City requires departments to establish internal controls related to its information technology systems. According to Administrative Directive 4-09 (AD 4-09), *Internal Control*, each department is required to establish and document a system of internal control procedures specific to its operations, mission, goals, and objectives.

The *Standards for Internal Control for the Federal Government by the Comptroller General of the United States* (Green Book) identified information technology as an integral part of most control activities and notes information processing objectives may include completeness, accuracy, validity, and security management.

Recommendation II

We recommend the City Manager ensures DAS improves its data reliability by:

- Improving Chameleon System controls related to accuracy, validity, and security
- Aligning the priority document to better reflect how priority categories are entered and maintained within the Chameleon System
- Developing monitoring procedures and Chameleon System reports for call response time on an organizational level

Recommendation III

We recommend the City Manager ensures DAS works with 311 and CIS to allow for better call response time analysis by:

- Resolving the issue in which dispatch and arrival times are overwritten by a later action
- Ensuring the call time is available in the Chameleon System for managers to review

Please see Appendix V for management's response to this recommendation.

Inadequate Policies and Procedures for Call Response Times and Dispatching

The DAS does not have formal (written, approved, and dated) policies and procedures related to call response timeliness or management review of call response timeliness. The DAS has documented its priorities for calls based on the type of call; however, this information is not included in formal policies and procedures. Without formal policies and procedures, DAS cannot ensure effective controls are in place and that DAS personnel are performing their duties consistently to meet goals for call response times.

Until June 2016, DAS policies and procedures did not include information related to call dispatching, responding to calls, and entering information related to calls in the Chameleon System. In late July 2016, DAS released two work instructions related to call dispatches and dispositions and call response. These one page documents provide instructions about an Animal Service Officer's responsibility related to call dispatching and recording the results of the call in the Chameleon System. A third work instruction related to an Animal Service Officer's responsibilities when responding to a call is in draft form and has not been released.

Policies and Procedures

The Green Book identifies established policies and procedures as a control activity needed to manage risk. Specifically:

- Documents in policies for each unit its responsibility for an operational processes, objectives and related risks, and control activity design, implementation, and operating effectiveness
- Defines policies through day-to-day procedures, depending on the rate of change in the operating environment and complexity of the operational process
- Communicates to personnel the policies and procedures so that personnel can implement the control activities for their assigned responsibilities
- Reviews policies, procedures, and related control activities periodically for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks

Source: Green Book

The National Animal Care and Control Association Guidelines recommend animal shelters have policies and procedures for patrol activity priorities. In addition, according to AD 4-09 each department is required to establish and document a system of internal control procedures specific to its operations, mission, goals, and objectives. The AD 4-09 requires each department to establish the internal controls in accordance with the Green Book.

Recommendation IV

We recommend the City Manager ensures DAS continues to develop and implement policies and procedures related to call response time management to resolve inconsistent protocols for collecting call response time information.

Please see Appendix V for management's response to the recommendation.

City's Dangerous Dog Program Has Limited Effectiveness, in Part Due to State Law Design Also Affecting Most Texas Cities Surveyed

A very small percentage of the dogs who bite or attack people in the City are determined to be Dangerous Dogs as defined by a State mandated program. State law requires a sworn statement (Dangerous Dog Affidavit) from witnesses requesting the dog be considered a Dangerous Dog, but most witnesses do not submit the statement. As a result, the City's Dangerous Dog Program has limited effectiveness protecting the community, as the following analysis shows:

- Twenty-three of the 2,537 dog bites in the City between January 1, 2015 and June 30, 2016 resulted in a Dangerous Dog determination, or 0.9 percent
- While some Texas cities had greater participation in their Dangerous Dog Program, the City's performance is consistent with the results reported by most cities surveyed. (See Appendix III for more information from a survey of 15 Texas cities.)

There are four factors preventing the City's Dangerous Dog Program from including more dogs, as follows:

1. Most witnesses contacted by the City do not initiate Dangerous Dog investigations by submitting a notarized Dangerous Dog Affidavit. CODE personnel cited the following reasons they hear from witnesses:
 - The dog's owner is a friend or relative
 - The witness does not want to upset a neighbor
 - The witness fears retaliation from the dog's owner
 - The witness does not want to go through the process needed to comply with State law

Dangerous Dogs

State law defines a Dangerous Dog as a dog that:

- Makes an unprovoked attack on a person that causes bodily injury and occurs in a place other than an enclosure in which the dog was being kept and that was reasonably certain to prevent the dog from leaving the enclosure on its own; or,
- Commits unprovoked attacks in a place other than an enclosure in which the dog was being kept and that was reasonably certain to prevent the dog from leaving the enclosure on its own and those acts cause a person to reasonably believe that the dog will attack and cause bodily injury to that person.

State law does not specifically exclude dogs owned by the victim, stray dogs, or deceased dogs, however, they are typically excluded.

According to BCG's analysis of City dog bite reports, owned dogs committed the majority of dog bites in the City. In 2015, 21 percent of the dog bites were by stray dogs, 37 percent were by restrained owned dogs, and 42 percent were by loose owned dogs.

Source: Texas Health & Safety Code Chapter 822 Subchapter D, interviews with CODE personnel, and the BCG report.

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Seven cities surveyed, including Dallas, reported challenges related to receiving Dangerous Dog Affidavits. Each of those cities cited fear of retaliation as a reason why more people do not submit Dangerous Dog Affidavits.

2. The Dangerous Dog Program does not currently have a public awareness campaign. CODE personnel have identified a need to improve outreach regarding the Dangerous Dog program, however, there currently is little information provided to the public. The City has developed, but not completed, a brochure.

Other cities have more efforts to promote the Dangerous Dog Program. For example, Austin Animal Service Officers provide Dangerous Dog flyers to dog bite victims and Garland employees attend neighborhood meetings and special events to educate the public about the options available to them if they are bitten by a dog.

3. The CODE policies and procedures do not reflect the roles and responsibilities of, or the coordination between, DAS and CODE's Dangerous Dog Program. In addition, the CODE's policy and procedure for the Dangerous Dog Program states witnesses are to be contacted to determine if an affidavit is warranted. The procedure does not describe the process for soliciting Dangerous Dog Affidavits in detail and does not state how the contact should be documented.

Dangerous Dog Program Management

DAS does not manage the Dangerous Dog Program, which has been managed by a separate division within CODE since about 2008. In 2017, DAS is expected to resume responsibility for managing the Dangerous Dog Program.

The Dangerous Dog Coordinator, a CODE employee, is responsible for investigating all Dangerous Dog cases. The Dangerous Dog Coordinator reports to a CODE Manager who also serves as the Hearing Officer for Dangerous Dog Hearings.

DAS personnel respond to all dog bite reports and oversee the Rabies quarantine program required under State law. The DAS Rabies Coordinator separately contacts dog bite victims and witnesses.

Source: CODE and DAS Organization Charts, Interviews with CODE and DAS personnel.

4. While information was shared between DAS and the CODE's Dangerous Dog Program, it was inadequate as follows:

- The CODE's Dangerous Dog Program does not have the same access to information regarding dog bites as DAS, including information from 911 calls
- Until June 15, 2016, DAS did not provide the Dangerous Dog Program completed dog bite reports for all potentially applicable cases
- The Dangerous Dog Program and DAS separately prepare spreadsheets detailing dog bite information in order to better track bites. The reports are not identical, but have overlapping information and the reports are not shared.

In addition, the Dangerous Dog Program and DAS are physically located in different buildings several miles apart which does not facilitate ease of communication.

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According to AD 4-09, each department is required to establish and document a system of internal control procedures specific to its operations, mission, goals, and objectives. The AD 4-09 requires each department to establish the internal controls in accordance with the Green Book. The Green Book identified established policies and procedures as a control activity needed to manage risk.

Recommendation V

We recommend the City Manager improves the Dangerous Dog Program by:

- Working with City's Intergovernmental Services to determine whether the State law requirement for a sworn statement can be eliminated or revised
- Taking steps to make the public more aware of the Dangerous Dog Program, including outreach efforts such as distributing a brochure and / or attending neighborhood meetings and special events
- Developing policies and procedures that define the: (1) roles between the CODE's Dangerous Dog Program and DAS personnel; (2) process for soliciting Dangerous Dog Affidavits; and, (3) process for Dangerous Dog investigations and hearings, including the roles and responsibilities of various parties and required coordination
- Improving coordination and communication between the CODE Dangerous Dog Program and DAS

Please see Appendix V for management's response to these recommendations.

Inadequate Policies and Procedures for Oversight of Active Dangerous Dog Cases

The CODE's policies and procedures for the oversight of active dangerous dog cases are inadequate. Specifically, CODE does not have policies and procedures for:

- Monitoring compliance with the Dangerous Dog Program's requirements
- The Dangerous Dog Coordinator's roles and responsibilities
- How often the Code's inspections of active dangerous dog cases are to be performed, including how the inspection report is to be maintained and who is responsible for performing the inspections

As a result, there is increased risk dangerous dogs are not adequately monitored and compliance with the Dangerous Dog Program requirements are not enforced consistently.

Analysis of 24 active dangerous dog cases as of July 8, 2016 showed:

- Two of 24, or 8 percent, lacked documentation of the latest inspection
- Four of 24, or 17 percent, did not have the insurance verification e-mail on file (individuals with dangerous dogs are required to maintain liability insurance of at least \$100,000 to cover potential damages)
- Eleven inspection dates in the case files did not match inspection dates in the tracking spreadsheet

According AD 4-09, each department is required to establish and document a system of internal control procedures specific to its operations, mission, goals, and objectives. The AD 4-09 requires each department to establish the internal controls in accordance with the Green Book. The Green Book identified established policies and procedures as a control activity needed to manage risk.

Recommendation VI

We recommend the City Manager ensures DAS improves the oversight of active Dangerous Dog cases by developing policies and procedures related to: (1) monitoring compliance with the Dangerous Dog Program's requirements; (2) the Dangerous Dog Coordinator's roles and responsibilities; and, (3) how often the inspections of active dangerous dogs are to be performed, including who is responsible for performing the inspections and how the inspection reports are maintained.

Please see Appendix V for management's response to the recommendation.

Inadequate Monitoring of Controlled Substances and Expired Drugs

The DAS does not have consistent inventory practices, documented policies and procedures, and adequate segregation of duties among the DAS personnel able to dispense drugs and those who perform inventory monitoring. The DAS also did not have policies and procedures in place to ensure that expired drugs, including controlled substances, were identified, separated, not used, and disposed of properly.

While animal shelters need controlled substances to operate, without appropriate policies and procedures in place, there is an increased risk: (1) controlled substances are subject to misuse (sale or diverted for personal use) without detection; and, (2) the DAS could inadvertently use drugs that are less effective to treat animals.

Controlled Substance Requirements / Guidelines

The U.S. Controlled Substances Act requires practitioners, including veterinary facilities, to maintain a record of its supply of drugs dispensed for a period of at least two years.

The National Animal Care and Control Association Guidelines recommend animal shelters have policies and procedures for controlled substances.

Source: United States Controlled Substances Act and National Animal Care and Control Association

Controlled Substances

Analysis of DAS inventory logs showed controlled substances were not properly accounted for, including:

- One 1,000 tablet bottle of Tramadol, an opioid used to lessen pain in animals
- More than 72 ccs of Fatal Plus, a Pentobarbital sodium used for fast and humane euthanasia
- More than one bottle of Butorphanol (69.45 ccs), an opiate used to lessen pain in animals
- Smaller quantities of other drugs

Changes in inventory accounting practices for the record logs for hydromorphone (an opioid used to treat pain) and valium (used to sedate or reduce anxiety) made it difficult to determine if any of those substances were missing. Some log notations were changed by DAS at a later date to explain unaccounted for drugs, including changes after auditors requested the logs.

Inventories and log notations were often not completed according to the log forms which required multiple initials or signatures. Most drug logs are recorded on forms; however, euthanasia drugs are recorded on notebook paper. Auditors identified 28 entries in multiple logs without any initials or signatures so it is not clear who was involved in dispensing the drugs and documenting the amounts used.

Expired Drugs

During an observation walkthrough of the DAS facilities the following issues were identified:

Expired Drug Handling Requirements / Guidelines

The United States Food and Drug Administration advises against the use of expired medicines on its website, saying expired medical products can be less effective or risky due to a change in chemical composition or a decrease in strength.

The United States Drug Enforcement Administration Practitioner's Manual for the United States Controlled Substances Act requires registrants to dispose of out-of-date, damaged, unusable, or unwanted controlled substances through transferring them to registered, specific Reverse Distributors. Registrants are required to maintain documentation of disposal of controlled substances for two years.

Source: United States Food and Drug Administration, National Animal Care and Control Association, and Drug Enforcement Administration.

- Sixteen containers of expired controlled substances
- At least two drugs, Tramadol and Fatal Plus (controlled substances), were used repeatedly after their expiration dates despite at least five DAS inventory checks performed after their expiration dates
- No expired drugs, including controlled substances, had been destroyed in the two years prior to the observation walk through performed on August 2, 2016
- A container of various expired donated drugs in the storage room that was not included in the expired drugs set aside for disposal

In addition, a drug destruction performed on August 30, 2016 did not follow proper procedures to ensure the drugs were properly accounted for by someone independent of the dispensing and inventory management functions prior to destruction.

The DAS does not have an inventory management system for its drugs and cannot directly compare the drugs on hand to the drugs that have been purchased. In addition, the DAS lacks consistent inventory practices and documented policies and procedures to ensure drugs are not lost or misused without detection, including:

- No policies and procedures for drug inventory management
- DAS personnel responsibilities are not clearly stated to ensure: (1) segregation of duties – for example, DAS personnel who dispense and administer drugs also conduct inventory counts; (2) monitoring of drugs; (3) completion of inventory logs; (3) the frequency of inventory counts; and, (4) actions required for drug inventory reviews regarding drug expiration dates
- Controlled substances needed to perform most euthanasia are monitored by a separate group of DAS personnel following separate practices and using separate logs than other controlled substances

A work instruction was subsequently developed for the disposal of expired drugs during the audit period. The document, however, was not detailed enough to be effective.

According to Administrative Directive 4-09, each department is required to establish and document a system of internal control procedures specific to its operations, mission, goals and objectives. The AD 4-09 requires each department to establish the internal controls in accordance with the Green Book. The Green Book identified established policies and procedures as a control activity needed to manage risk.

Recommendation VII

We recommend the City Manager ensures DAS improves drug inventory management by:

- Developing policies and procedures for drug inventory management, including DAS personnel responsibilities and procedures related to the monitoring of drugs, completion of inventory logs, and the frequency of inventory counts. The policies and procedures should include the monitoring of and disposal of expired drugs, including controlled substances.
- Ensuring segregation of duties between the DAS personnel who are authorized to conduct inventory counts and the DAS personnel who are authorized to administer or dispense the drugs
- Working with CIS to obtain / develop, implement, and use a drug inventory management system

Please see Appendix V for management's response to this recommendation.

Inadequate Surveillance Camera System Management

The DAS surveillance camera system management is inadequate, and DAS personnel responsible for managing the surveillance camera system have not received training. As a result, surveillance cameras may not be working when needed, theft or misuse can occur undetected, and the video may not be available to review after the fact.

An observation walk-through of DAS facilities showed:

- Six cameras were not working
- Five cameras could not be accounted for within the information technology system
- Documentation of the cameras that were not working was incomplete
- Cameras were not positioned to capture high risk areas, such as several safes and the largest drug storage area
- Six cameras were working with major issues (for example, the view from a storage room camera was blocked by supplies)
- Fifty-nine cameras were working with no major issues

Several factors may be involved in the inadequate management of the surveillance camera system, including:

- Internal documents cite insufficient contractor management during the project to install the camera system
- There are no policies and procedures for surveillance camera operations
- There was no DAS personnel training on the surveillance camera system
- The surveillance camera system is maintained in a room where climate is not controlled and temperatures rise to uncomfortable levels which is not recommended for storing computer equipment

The CODE's Fiscal Year (FY) 2011 self-assessment performed to comply with AD 4-09 stated surveillance cameras will be installed in the areas where inventory is stored to improve security over inventory. The AD 4-09 requires that management establish and maintain a system of internal controls. Without adequate physical safeguards, such as operational cameras, assets and records may be stolen, altered, misplaced or lost, and personnel may be harmed.

The Green Book identified established policies and procedures as a control activity needed to manage risk.

Recommendation VIII

We recommend the City Manager ensures DAS improves the surveillance camera system by:

- Ensuring existing cameras are accounted for and operational
- Conducting a review of the surveillance camera system to determine if improvements or additional cameras are warranted
- Developing policies and procedures related to operating, overseeing, and managing the system
- Providing training to the DAS personnel responsible for managing the surveillance cameras
- Ensuring surveillance camera monitoring equipment is housed in a climate-controlled area

Please see Appendix V for management's response to these recommendations.

Inadequate Controls for Access to Restricted Areas

Access to restricted areas is not properly controlled. As a result, there is an increased risk that unauthorized access to restricted areas will occur without detection.

A walk-through observation of DAS facilities showed there are three ways people could access restricted areas and avoid existing security controls. Specifically:

- Secure doors to the veterinary clinic were propped open on two occasions during business hours
- The access code entry lock to the protective custody room was not active during a walk-through conducted before DAS' normal business hours
- On two occasions a key to a drug storage room was observed hanging on the door handle of an office. The key was left there to allow other DAS veterinary personnel easier access to the drugs, which did not include controlled substances.

The Green Book states: *“Management establishes physical control to secure and safeguard vulnerable assets. Examples include security for and limited access to assets such as inventories, and equipment that might be vulnerable to risk of loss or unauthorized use”*. A DAS policy and procedure restricts access to security doors only to authorized DAS personnel. Access to the doors to the veterinary areas and protective custody room are restricted using employee pin numbers obtained through a DAS manager and administrator approval of a completed secure access form. The form states providing someone else a PIN can be grounds for discipline up to and including termination.

Recommendation IX

We recommend the City Manager ensures DAS improves security protocols related to access to restricted areas, including eliminating the observed practices described above.

Please see Appendix V for management's response to the recommendation.

Inadequate Documentation of Compliance with the Association of Shelter Veterinarians’ Guidelines

The DAS generally complies with most of the Association of Shelter Veterinarians’ Guidelines for Standards of Care in Animal Shelters, 2010 (Guidelines); however, seven Guidelines were not implemented, and the DAS policies and procedures do not specifically address 55 of the 98 Guidelines reviewed (see Table II below). In addition, in a June 22, 2016 survey of 14 DAS personnel, seven either said they could not find the DAS policies and procedures or said they were available in an incorrect location. As a result, DAS personnel may not consistently apply guidelines for standards of care.

Table I

Analysis of Association of Shelter Veterinarians’ Guidelines for Standards of Care in Animal Shelters Compared to DAS Policies and Procedures

Guideline Category	Included in DAS Policies and Procedures			Comments
	Yes	No	Insufficient Detail to Ensure Compliance	
Animal Handling	Two of the 11 guidelines were documented in DAS Field Operations Policies and Procedures		Nine of the 11 guidelines	The DAS stated all 11 guidelines are now implemented. Other animal handling documents provided to DAS personnel do not specifically address the 11 guidelines applicable to animal shelter operations.
Sanitation	Eighteen of the 60 guidelines were documented	Three of the 60 guidelines – The shelter manager said DAS is not meeting guidelines for sufficient personnel, accessibility to sinks, and use of hand sanitizer in lieu of hand washing	Thirty-nine of the 60 guidelines, including those related to enhanced cleaning and sanitation practices during a disease outbreak to cleaning practices for outdoor areas and food and water bowls	The DAS stated 57 of the 60 guidelines reviewed during the audit are now implemented.
Population Management	Six of the 13 guidelines were documented related to Shelter Rounds, Euthanasia, and the Shelter Admission of Animals	Two of 13 guidelines – The DAS stated it did not always have enough DAS personnel to provide the quality of care needed	Five of 13 guidelines	The DAS stated 11 of the 13 guidelines are now implemented.
Management and Recordkeeping	Partial or complete documentation for 10 of the 14 guidelines	Two of the 14 guidelines were not implemented: (1) ID collars on all dogs not determined to be dangerous; and, (2) availability of policies and procedures to personnel	Two of the 14 guidelines – DAS said one was now implemented or the auditors observed it in practice	

Source: Office of the City Auditor analysis of DAS Policies and Procedures

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The Guidelines were developed “to provide a tool that would allow communities and animal welfare organizations of all sizes ... to identify minimum standards of care, as well as best and unacceptable practices”.

The American Society for the Prevention of Cruelty to Animals in 2014 developed a checklist of the Guidelines to help shelter personnel and communities determine if the shelters comply with the Guidelines.

The National Animal Care & Control Association’s Guideline for Policy and Procedure Manuals states that animal care and control agencies and organizations must have policies and procedures in place for the efficient operation of their facilities, including policies and procedures for Animal Handling Restraint / Safety.

According to AD 4-09, each department is required to establish and document a system of internal control procedures specific to its operations, mission, goals, and objectives. The AD 4-09 requires each department to establish the internal controls in accordance with the Green Book. The Green Book identified established policies and procedures as a control activity needed to manage risk.

Recommendation X

We recommend the City Manager ensures DAS:

- Formalizes certain practices already used and also develops and / or revises policies and procedures and other documentation used to guide DAS personnel to reflect the Association of Shelter Veterinarians Guidelines for the Standards of Care in Animal Shelters for the areas identified in this audit: Animal Handling, Sanitation, Population Management, and Management and Recordkeeping
- Ensures policies and procedures are made available to DAS personnel responsible for conducting animal services operations

Please see Appendix V for management’s response to the recommendation.

Inadequate Policies and Procedures for Training Compliance

The DAS does not have policies and procedures to ensure DAS personnel are up-to-date on State mandated training for Animal Service Officers and the performance of euthanasia. The spreadsheet DAS uses to track compliance with euthanasia training did not include six active Animal Service Officers. While no DAS personnel actually performing euthanasia were found to be out of compliance with euthanasia training requirements, there is greater risk DAS personnel could fall out of compliance if there are no policies and procedures for training.

The DAS uses guidance from the Texas Department of State Health Services regarding who is required to take the training. The guidance does not include information on how to track, monitor, and ensure compliance.

City Code, Chapter 7 requires DAS to have policies and procedures for training procedures.

The National Animal Care & Control Associations Guideline for Policy and Procedure Manuals states that animal care and control agencies and organizations must have policies and procedures in place for the efficient operation of their facilities, including policies and procedures for Euthanasia Certification.

According to AD 4-09, each department is required to establish and document a system of internal control procedures specific to its operations, mission, goals, and objectives. The AD 4-09 requires each department to establish the internal controls in accordance with the Green Book. The Green Book identified established policies and procedures as a control activity needed to manage risk.

Recommendation XI

We recommend the City Manager develops policies and procedures related to DAS personnel training.

Please see Appendix V for management's response to the recommendation.

Dallas Animal Services Did Not Consistently Conduct Annual Veterinarian Inspections

From calendar years 2012 through 2014, DAS did not employ a veterinarian to conduct an annual veterinarian inspection of DAS in compliance with the State Health and Safety Code (see textbox). The 2015 inspection was performed on November 10, 2015 by the DAS Operations Manager, a licensed veterinarian. The inspection report was submitted to the State after an audit request for the veterinarian inspection documentation. As a result, the City had not been in compliance with the Standards for Animal Shelters' requirements until the audit.

Although veterinarian inspections were performed for the City in 2010 and 2011, DAS stated it was unaware of the requirement and had not been advised by the Texas Department of State Health Services that this annual inspection report was required.

Most of the State's largest cities were more likely than Dallas to submit the veterinarian's inspection report during the period. A review of the inspection forms submitted for the ten largest cities in Texas during the same four-year period showed:

- Two cities complied all four years
- Two cities complied three of four years
- Three cities complied two of four years
- Dallas and one other city complied one of four years
- One city did not comply all four years

These veterinarian inspections provide a systematic review of operations and provide improvement opportunities. For example, one large Texas city's veterinarian inspection reports identified significant operational concerns that needed to be remedied.

Recommendation XII

We recommend the City Manager ensures DAS conducts annual inspections of DAS as required in State Health and Safety Code Chapter 823.

Please see Appendix V for management's response to the recommendation.

State of Texas Health and Safety Code

Chapter 823, Section 823.003 *Standards for Animal Shelters*; Criminal Penalty, paragraph (d) states: Each person who operates an animal shelter shall employ a veterinarian at least once a year to inspect the shelter to determine whether it complies with the requirements of this Chapter and Chapter 829, *Animal Control Officer Training*. The veterinarian shall file copies of the veterinarian's report with the person operating the shelter and with the department on forms described by the department.

This section contains multiple requirements. "A person commits an offense if the person substantially violates this section. An offense under this subsection is a Class C misdemeanor."

Source: State of Texas Health and Safety Code

Appendix I

Background, Objective, Scope and Methodology

Background

The Dallas Animal Services (DAS) is a division of the Department of Code Compliance (CODE). The DAS operates one animal shelter at 1818 North Westmoreland Road. The animal shelter was opened in 2007 and has ideal capacity for about 600 animals, though it has housed up to 800 animals.

The DAS budgets have increased 58 percent from \$7,979,512 in Fiscal Year (FY) 2014 to \$12,608,171 in FY 2017, and DAS' full-time equivalents (FTEs) increased from 95 FTEs to 130 FTEs during the same time period as City of Dallas (City) leaders provided additional resources to improve performance and services.

Table II

DAS Budgets for FY 2014 through FY 2017

	FY 2014	FY 2015	FY 2016	FY 2017
Total Budget	\$ 7,979,512	\$ 9,074,330	\$ 10,556,608	\$ 12,608,171
Full Time Equivalents	95	101.5	109	130

Source: Office of the City Auditor analysis of FY 2014 through FY2017 Adopted Budgets.

The DAS admitted 28,430 animals in FY 2016, including those brought in by the community, surrendered by owners, or picked up in the field. The animal shelter's live release rate for FY 2016 was 61.1 percent.

The DAS responds to calls for service primarily dispatched through the Management Services / 311 Customer Service Center (311). In FY 2016, DAS responded to 51,392 calls for service and issued 5,038 citations to animal owners for failure to comply with City Codes related to animals.

Beginning in 2014 and 2015, the City Council prioritized oversight of DAS, especially related to field services. Concern related to loose dogs and dog attacks spurred the hiring of Boston Consulting Group (BCG) in 2016 to conduct an analysis of DAS operations.

Boston Consulting Group

In August 2016, BCG completed a report of DAS regarding the public safety impacts of the loose dog problem.

The BCG made seven main recommendations:

- 1) Publicly adopt a mission statement balancing public safety and animal welfare

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- 2) Increase field intake (up to 8,700 loose dogs) and increase related enforcement and education to prevent dogs from roaming
- 3) Increase the number of positive outcomes for Dallas dogs, euthanizing only the sickest animals
- 4) Provide approximately 46,000 low-cost spay and neuter surgeries in southern Dallas each year for the next three years
- 5) Create a collaborative community of partners
- 6) Make animal services a priority and strengthen accountability within the City government
- 7) Ensure efficiency by measuring outcomes and increasing volunteers

In September 2016, the City Manager provided an update to the Mayor and City Council addressing management changes and oversight for DAS, including appointing a Task Force to coordinate and advise implementing the BCG recommendations. Deputy Chief of Police Robert Sherwin was appointed to lead DAS and report directly to the City Manager for approximately six months³.

In October 2016, the DAS mission statement was revised to *“Helping Dallas be a safe, compassionate, and healthy place for people and animals”*. The DAS website previously said DAS was *“dedicated to the humane treatment of animals in Dallas and educating others about responsible pet ownership”*.

The BCG’s review came more than five years after another major outside analysis proposed changes to DAS operations. In November 2010, a Humane Society of the United States review identified more than 250 recommendations for improving DAS’ operations.

Objective, Scope and Methodology

This audit was conducted under authority of the City Charter, Chapter IX, Section 3 and in accordance with the FY 2016 Audit Plan approved by the City Council. This performance audit was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit objective was to evaluate Animal Services operations which include: (1) animal kennel care; (2) call response times; and, (3) drug inventory management compared to best practices and determine whether they comply with applicable laws, regulations, and policies. The objective was further expanded to also include the Dangerous Dog Program.

³ The City Manager has since appointed Major of Police Barbara L. Hobbs to lead DAS.

**An Audit Report on –
Dallas Animal Services Operations**

The audit period covered FY 2015 and 2016. We also evaluated certain related transactions and records before and after that period.

To achieve the audit objective, we performed the following procedures:

- Conducted interviews with DAS, CODE, the Department of Communication and Information Services, and 311
- Conducted multiple walk-throughs of the DAS facility
- Researched applicable Federal, State, and local statutes that impact animal services operations requirements
- Reviewed DAS and CODE policies and procedures
- Surveyed the 20 largest cities in Texas about their Dangerous Dog Programs
- Reviewed the City's Dangerous Dog Program's activities between May 30, 2016 and June 10, 2016 related to a sample of 52 dog bites
- Reviewed CODE's oversight of active dangerous dog cases as of June 10, 2016 and July 8, 2016 to review the completeness of documentation and the timeliness of oversight
- Reviewed the adequacy of hearing documentation related to ten Dangerous Dog Affidavits
- Evaluated the implementation of 98 Association of Shelter Veterinarians Guidelines for Standards of Care in Animal Shelters, 2010, for the four chapters related to Animal Handling, Sanitation, Population Management, and Management and Recordkeeping
- Reviewed the Texas Department of State Health Services Animal Shelter inspection records for animal shelters owned or managed by the ten largest cities in Texas
- Reviewed the data reliability controls for DAS software applications for completeness, accuracy, validity, and security
- Assessed the on-time performance for DAS' response times to high priority calls
- Performed inventory reviews of controlled substances stored at the DAS
- Conducted a review of the surveillance camera system management
- Reviewed staff compliance with the State requirement for euthanasia training certification

Appendix II

High Priority Call Response Time Information by Council District

Auditors reviewed 7,466 calls for response timeliness. The map on page 30 shows the calls by type and where in the City of Dallas (City) they were received. Due to the inability to match all addresses to the map, about 8 percent, or 622, of the calls could not be included in the map.

Person in Danger Calls

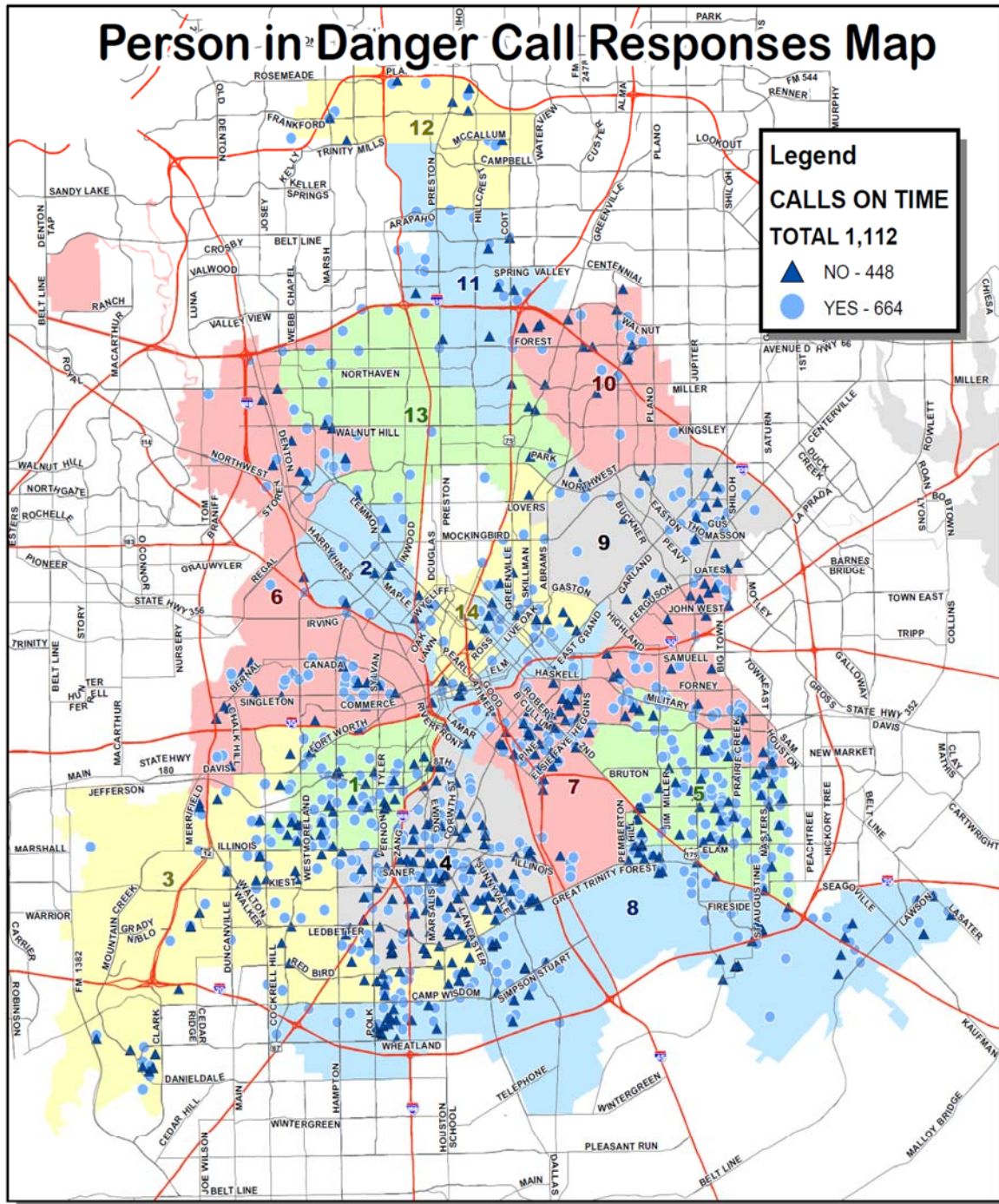
The highest priority responses in Dallas Animal Services (DAS) involve the response to a call that a person is in danger. The DAS set a goal of one hour to respond to most *Person in Danger* calls. Some *Person in Danger* calls involving wild animals in a home have a goal of two hours, and others involving an assist to emergency responders have a goal of three hours. Auditors reviewed 1,317 *Person in Danger* calls for call response.

Table III

Person in Danger Call On-Time Performance by City Council District

Council District	Number of Calls	Percent of Total Calls	Percent Met Goal
Blank	6	0.5	100.0
1	107	8.1	66.4
2	74	5.6	66.2
3	119	9.0	50.4
4	224	17.0	53.6
5	161	12.2	66.5
6	94	7.1	58.5
7	158	12.0	54.4
8	147	11.2	56.5
9	58	4.4	58.6
10	34	2.6	44.1
11	36	2.7	66.7
12	16	1.2	43.8
13	39	3.0	56.4
14	44	3.3	52.3
Total	1317	100	

See the map on page 29 for a visual representation of *Person in Danger* calls. Approximately 15 percent of the calls, or 205, could not be included due to challenges matching intersection addresses to the map.



Data Source:
 Roads, Council Districts - Enterprise GIS/CIS
 Office of the City Auditor analysis of completed Dallas Animal Services calls

DISCLAIMER

The accuracy is not to be taken / used as data produced by a Registered Professional Land Surveyor for the State of Texas. For this level of detail, supervision and certification of the produced data by a Registered Land Surveyor for the State of Texas would be required. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries.

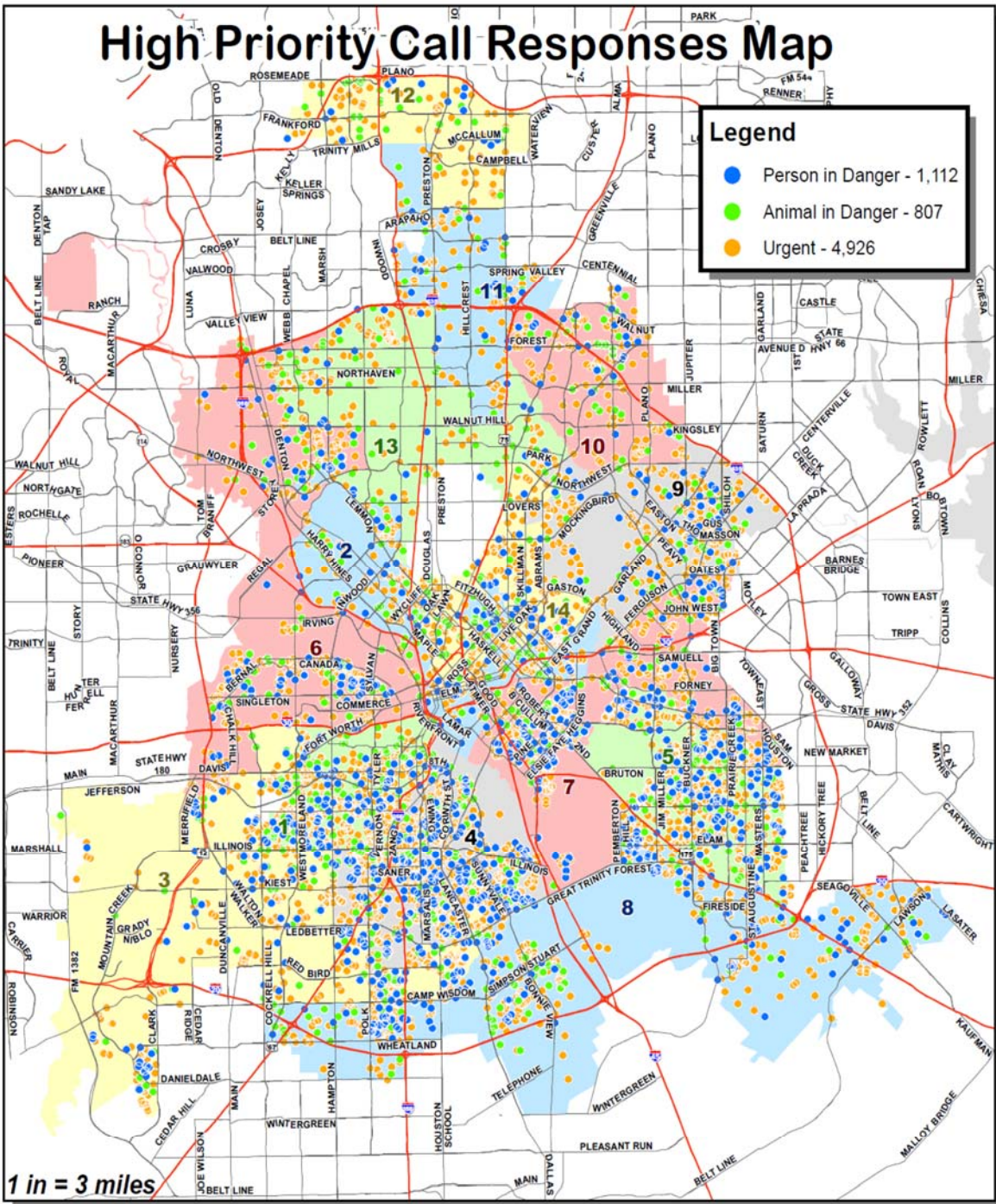
Completed Dallas Animal Services calls between March 1, 2016 and July 25, 2016

Note: Approximately 8% (621) of the calls are not included on the map due to incomplete addresses.



Date: Thursday, November 03, 2016 2:22:12 PM
 Project Name: Letter
 File Location: O:\Auditor\2016\1031_2766_LocMap_Gen2Letter.mxd
 Prepared By: Kevin S. Burns
 Property of: City of Dallas Enterprise GIS for illustrative purposes only.





**Completed Dallas Animal Services calls between
 March 1, 2016 and July 25, 2016**

Data Source:
 Roads, Council Districts - Enterprise GIS/CIS
 Office of the City Auditor analysis of completed Dallas Animal Services calls
 DISCLAIMER

Note: Approximately 8% (621) of the calls are not included on the map due to incomplete addresses.

The accuracy is not to be taken / used as data produced by a Registered Professional Land Surveyor for the State of Texas. For this level of detail, supervision and certification of the produced data by a Registered Land Surveyor for the State of Texas would be required. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries."



Date: Thursday, November 03, 2016 10:41:13 AM
 Project Name: Letter
 File Location: U:\Auditor\20161031_2766_LocMap_Gen2Letter.mxd
 Prepared By: Kevin S. Burns
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Dangerous Dog Program Survey Results and Additional Background Information

Dangerous Dog Programs Are Typically Small

A survey was conducted of the 20 cities with the largest populations in the State of Texas (State) to learn more about their Dangerous Dog Programs, as well as the number of dog bites and dangerous dogs they oversee. Fifteen cities, including the City of Dallas (City), responded to the survey. The survey results show the Dangerous Dog Programs in cities across the State typically involve a small fraction of the dog bites that occur. For example, as of June 30, 2016, there were seven Dangerous Dogs in Houston, 29 in Dallas, and 59 in Austin.

Table IV
Survey Results of Dog Bites, Dangerous Dogs, and Affidavits
Vary Significantly Among Texas Cities

City	Population (as of 07/01/ 2015)	Dog Bites (01/01/2015 to 06/30/2016)	Dangerous Dogs (as of 06/30/2016)	Total Affidavits (01/01/2015 to 06/30/2016)	Percent of Dog Bites Resulting in Affidavits (01/01/2015 to 06/30/2016)
Houston	2,296,224	2,956	7	34	1.2
Dallas	1,300,092	2,537	29	38	1.5
Austin	931,830	5,032	59	0	N/A*
Fort Worth	833,319	2,071	35	62	3.0
El Paso	681,124	1,800	9	16	0.9
Arlington	388,125	758	22	61	8.0
Corpus Christi	324,074	1,283	0	32	2.5
Plano	283,558	622	4	10	1.6
Lubbock	249,042	368**	0	31	8.4
Garland	236,897	250	10	54	21.6
Irving***	236,607	310	1	12	3.9
Amarillo***	198,645	925	6	0	N/A
McKinney	162,898	495	2	6	1.2
Frisco	154,407	308	0	0	0.0
Mesquite	144,788	158	0	0	0.0
Total	8,421,630	19,873	184	356	1.8

* Not applicable because affidavits not tracked – Excluding Austin and Amarillo, the Total Percent of Dog Bites Resulting in Affidavits would be 2.6 percent

** Lubbock had incomplete dog bite data for the period.

*** Irving and Amarillo do not separate out dog bite data, so their bite data includes bites by cats and other animals.

The source for the population estimates was the 2015 United States Census update.

Five cities did not respond to the survey: San Antonio, Laredo, Grand Prairie, Brownsville, and Pasadena.

Several cities lacked information on the number of affidavits and several cities do not allow dangerous dogs.

An Audit Report on – Dallas Animal Services Operations

The State law, *Texas Health and Safety Code Chapter 822, Subchapter D*, mandates additional requirements for owning a dangerous dog. Cities or counties are responsible for operating these programs. The owner of the dangerous dog can either comply with the requirements or surrender the dangerous dog for euthanasia.

Determining Dogs Are Dangerous

The dangerous dog process is dependent on witnesses reporting an incident as described by the statute. The witnesses must submit a sworn affidavit to begin the dangerous dog process.

Once a sworn statements received, the local jurisdiction is then responsible for determining if the attack meets the definition of a dangerous dog. State law defines a dangerous dog as a dog that:

- Makes an unprovoked attack on a person that causes bodily injury and occurs in a place other than an enclosure in which the dog was being kept and that was reasonably certain to prevent the dog from leaving the enclosure on its own; or,
- Commits unprovoked attacks in a place other than an enclosure in which the dog was being kept and that was reasonably certain to prevent the dog from leaving the enclosure on its own and those acts cause a person to reasonably believe that the dog will attack and cause bodily injury to that person.

The Dallas City Code further defines an unprovoked attack as an action that is not:

- In response to being tormented, abused, or assaulted by any person
- In response to pain or injury
- In protection of itself or its food, kennel, immediate territory, or nursing offspring
- In response to an assault or attempted assault on a person

Cities surveyed were evenly split in how dangerous dog determinations are made. In the City, and for six other survey respondents, a hearing is held to determine if the dog is dangerous. City dangerous dog cases were decided by a four-person panel including the Dangerous Dog Hearing Officer, the Dangerous Dog Coordinator, the Dallas Animal Services Rabies Investigator, and the District Manager for the Code Compliance District in which the attack occurred. The complainant, typically the victim, and the dog's owner each describe what happened and any witnesses can also testify to what occurred.

In seven other cities, an experienced City employee, typically a high level manager in Animal Services, determines if the dog is dangerous without a hearing. The decision is typically made after reviewing the sworn statement and talking to the victim, witnesses, and the dog's owner separately. The determination can be appealed in all cities surveyed.

Requirements for Owning a Dangerous Dog

Once a city has determined a dog to be dangerous, the owner has 30 days to comply with State requirements and the city's requirements. State law requires the dog to be:

- Restrained at all times by leash or secure enclosure
- Insured by a liability policy of at least \$100,000
- Annually registered with the city as a Dangerous Dog

The Dallas City Code also requires the animal to be spayed and neutered, micro-chipped, and always wear its Dangerous Dog Registration Tag. All entrances to the dog's enclosure must also be marked with a Beware Dangerous Dog sign. Failure to comply with all these requirements can result in a warrant allowing the City to seize the dog.

While the Dangerous Dog Program requirements are designed to protect the community from a future attack, they do not guarantee the dog is not a risk. In the period reviewed from January 1, 2015 to June 30, 2016, the survey respondents reported nine Dangerous Dogs committed additional attacks after they had been determined to be dangerous. In the City, a dog that had been determined to be a dangerous dog in April 2013 and could not be located to be forced to comply with the Dangerous Dog Program's requirements committed an attack in 2015.

Several survey respondents, including the City, said ensuring owners comply with the requirements for owning a dangerous dog is challenging. Ten survey respondents inspect the homes of the dangerous dogs at least annually, with some inspected quarterly. The City inspects quarterly in the first year and annually thereafter.

Several survey respondents identified challenges related to operating the Dangerous Dog Program as follows:

- Houston – Allocating resources to address the dangerous dog cases while still responding to daily case volume is a challenge
- Dallas – Owners of a Dangerous Dog can surrender the animal for euthanasia and nothing prevents them from adopting another animal
- Austin – An unclear appeal process can drag on for years and opposition to euthanasia creates public concern about the decisions
- Arlington – Keeping up with inspections and owners in compliance
- Corpus Christi – Following up on cases in a timely manner
- Plano – Making sure the arbitration process is not overused
- Amarillo – Holding dogs during the process is challenging due to shelter capacity

Appendix IV

Major Contributors to This Report

Daniel Genz – Project Manager
Bob Smith, CPA (Alabama) – Auditor
Lee Chiang, CIA – Auditor
Carol A. Smith, CPA, CIA, CFE, CFF – First Assistant City Auditor
Theresa Hampden, CPA – Quality Control Manager

Management's Response

Memorandum

RECEIVED

DEC 08 2016

City Auditor's
Office



DATE: December 5, 2016

TO: Craig D. Kinton, City Auditor

SUBJECT: Response to Audit Report:
Audit of Dallas Animal Services Operations

Our responses to the audit report recommendations are as follows:

Recommendation 1

We recommend the City Manager ensures DAS reviews and tracks call response times to improve the timeliness of high priority call responses, including: (1) tracking and monitoring call response times; (2) reporting and monitoring call productivity; and, (3) obtaining and using routing software to minimize travel time between calls.

Management Response / Corrective Action Plan

Agree Disagree

DAS agrees to improve timelines of high priority call responses by:

- Working with CIS to make adjustments in the Customer Service Request (CSR) interface system to format data to make it recognizable by the Chameleon system to push the "Call Time" and "Response Time" data from the CSR system where the calls are taken to Chameleon where they are dispatched. The fix has been successfully tested in the new Chameleon Test environment.
- The implementation of Field Force Management to work along with the Chameleon System may be utilized to track and monitor the officers' location and productivity in the field.
- DAS and CIS will work together to review the viability of existing reports in the Chameleon Reports Directory, all future reports created will be validated by Chameleon support staff.
- DAS is seeking to hire a fulltime Data Analyst to enhance reporting and monitoring capabilities.
- Once the Chameleon System has been upgraded in the coming months, the Chameleon System will be reevaluated to determine if it meets DAS's objectives
"Dallas, the City that Works: Diverse, Vibrant and Progressive."

for monitoring, responding, and minimizing travel time in responding to calls. If the features and benefits of the Chameleon System upgrade does not meet the needs and objectives of DAS, DAS will submit a Business Technology Request (BTR) to CIS to examine other shelter management database.

Implementation Date

- June 30, 2019

Responsible Manager

- Manager III, Field
- Manager II, Business

Recommendation II

We recommend the City Manager ensures DAS improves its data reliability by:

- Improving Chameleon System controls related to accuracy, validity, and security
- Aligning the priority document to better reflect how priority categories are entered and maintained within the Chameleon System
- Developing monitoring procedures and Chameleon System reports for call response time on an organizational level

Management Response / Corrective Action Plan

Agree Disagree

DAS agrees to improve its data reliability by:

- Improving Chameleon System controls related to accuracy, validity, and security.
- Currently in the Chameleon System; priorities are color coded to reflect the levels of priority in the dispatch view. DAS is reviewing all current procedures related to priorities; revisions will be made if needed.
- DAS and CIS will work together to review the viability of existing reports in the Chameleon Reports Directory, all future reports created will be validated by Chameleon support staff.
- DAS is seeking to hire a fulltime Data Analyst to enhance reporting and monitoring capabilities.
- A new procedure for "Response Time" will be created once CIS completes their research of the issue itself, anticipated implementation of resolution during the Chameleon system upgrade.
- It is not certain that the Chameleon System can meet the long term needs of DAS. For that reason, DAS will continue to evaluate Chameleon and the features "Dallas, the City that Works: Diverse, Vibrant and Progressive."

and benefits of the updated version. If it is determined that another shelter management system offers the functionally needed and meets the established criteria, DAS and CIS will work together in pursuit of that option.

Implementation Date

- Full implementation based on Animal Shelter Software analysis by September 30, 2019

Responsible Manager

- Manager III, Field
- Manager II, Business

Recommendation III

We recommend the City Manager ensures DAS works with 311 and CIS to allow for better call response time analysis by:

- Resolving the issue in which dispatch and arrival times are overwritten by a later action
- Ensuring the call time is available in the Chameleon System for managers to review

Management Response / Corrective Action Plan

Agree Disagree

- A new procedure for "Response Time" will be created once CIS completes their research of the issue itself, anticipated implementation of resolution during the Chameleon system upgrade.
- Once the Chameleon System has been upgraded in the coming months, the Chameleon System will be reevaluated to determine if it meets DAS's objectives for monitoring, responding, and minimizing travel time in responding to calls. If the features and benefits of the Chameleon System upgrade does not meet the needs and objectives of DAS, DAS will submit a BTR to CIS to examine other shelter management database options.

Implementation Date

- Full implementation based on Animal Shelter Software analysis by September 30, 2019

Responsible Manager

- Manager III, Field
- Manager II, Business

Recommendation IV

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We recommend the City Manager ensures DAS continues to develop and implement policies and procedures related to call response time management to resolve inconsistent protocols for collecting call response time information.

Management Response / Corrective Action Plan

Agree Disagree

- DAS and CIS will continue to work together to address all impediments in entering, accessing, and reporting valid data via Chameleon.
- A new procedure for "Response Time" will be created once CIS completes their research of the issue itself, anticipated implementation of resolution during the Chameleon system upgrade.
- Once the Chameleon System has been upgraded in the coming months, the Chameleon System will be reevaluated to determine if it meets DAS's objectives for monitoring, responding, and minimizing travel time in responding to calls. If the features and benefits of the Chameleon System upgrade does not meet the needs and objectives of DAS, DAS will submit a BTR to CIS to examine other shelter management database options.

Implementation Date

- Full implementation based on Animal Shelter Software analysis by September 30, 2019

Responsible Manager

- Manager III Field

Recommendation V

We recommend the City Manager improves the Dangerous Dog Program by:

- Working with City's Intergovernmental Services to determine whether the State law requirement for a sworn affidavit can be eliminated or revised
- Taking steps to make the public more aware of the Dangerous Dog Program, such as distributing a brochure and / or attending neighborhood meetings and special events
- Developing policies and procedures that define the: (1) roles between the CODE Dangerous Dog Program and DAS personnel; (2) process for soliciting affidavits; and, (3) process for Dangerous Dog investigations and hearings, including the roles and responsibilities of various parties and required coordination
- Improving coordination and communication between the CODE Dangerous Dog Program and DAS

Management Response / Corrective Action Plan

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Agree Disagree

- The requirement for a sworn affidavit is in Texas Health & Safety Code Chapter 822 Subchapter D. All Texas cities are subject to this state law. Employees will discuss the possibility of the City seeking a change to eliminate or revise the need for a sworn affidavit to proceed with a Dangerous Dog hearing with Intergovernmental Services.
- A Dangerous Dog Brochure has been created and finalized. Once produced, the brochure will be provided to Dallas Animal Services Officers for distribution in the field and to Neighborhood Code Representatives to handout during Neighborhood Association, Community and Town Hall meetings. Additionally, employees will include the brochure in all mail outs to citizens who request a Dangerous Dog Affidavit and posted on the Dallas Animal Services website.
- Employees will review all policies and procedures associated with the Dangerous Dog Program requirements and make the necessary changes to ensure that all processes are clearly defined and documented. Code Compliance has a registered ISO 9001 Quality Management System, so all procedure changes must be documented, approved, implemented, tested, and revised according to ISO standards.
- The Dangerous Dog program will be transitioned from Code Compliance back to Dallas Animal Services, eliminating the need to improve coordination and communication between Code and DAS.

Implementation Date

- September 30, 2017

Responsible Manager

- Manager III – Quality Management System (ISO)

Recommendation VI

We recommend the City Manager ensures DAS improves the oversight of active Dangerous Dog cases by developing policies and procedures related to: (1) monitoring compliance with the Dangerous Dog Program's requirements; (2) the Dangerous Dog Coordinator's roles and responsibilities; and, (3) how often the inspections of active dangerous dogs are to be performed, including who is responsible for performing the inspections and how the inspection reports are maintained.

Management Response / Corrective Action Plan

Agree Disagree

- Employees will review all policies and procedures associated with the Dangerous Dog Program requirements and make the necessary changes to ensure that all processes, roles and responsibilities are clearly defined and documented. Code Compliance has a registered ISO 9001 Quality

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Management System, so all procedure changes must be documented, approved, implemented, tested, and revised according to ISO standards.

Implementation Date

- September 30, 2017

Responsible Manager

- Manager III – Quality Management System (ISO)

Recommendation VII

We recommend the City Manager ensures DAS improves drug inventory management by:

- Developing policies and procedures for drug inventory management, including DAS personnel responsibilities and procedures related to the monitoring of drugs, completion of inventory logs, and the frequency of inventory counts. The policies and procedures should include the monitoring of and disposal of expired drugs, including controlled substances.
- Ensuring segregation of duties between the DAS personnel who are authorized to conduct inventory counts and the DAS personnel who are authorized to administer or dispense the drugs
- Working with CIS to obtain / develop, implement, and use a drug inventory management system

Management Response / Corrective Action Plan

Agree Disagree

- DAS is in the process of developing manual drug policies that include procedures on storage, monitoring, inventories, and segregation of responsibilities of the drug inventory management system. DAS has a registered ISO 9001 Quality Management System, so all procedure changes must be documented, approved, implemented, tested, and revised according to ISO standards.
- DAS will assess the features and benefits of the upgraded Chameleon System to determine if it will meet the long-term DAS needs for drug inventory management which should include a bar coding scanning capabilities to ensure increased accuracy of drug counts.
- If it is determined that another shelter management system offers the functionality needed and meets the established criteria, DAS and CIS will work together in pursuit of that option

Implementation Date

- Manual drug inventory procedures should be implemented by December 31, 2017

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- Full implementation based on Animal Shelter Software analysis by September 30, 2019

Responsible Manager

- Manager II, Medical
- Manager II, Business

Recommendation VIII

We recommend the City Manager ensures DAS improves the surveillance camera system by:

- Ensuring existing cameras are accounted for and operational
- Conducting a review of the surveillance camera system to determine if improvements or additional cameras are warranted
- Developing policies and procedures related to operating, overseeing, and managing the system
- Providing training to the DAS personnel responsible for managing the surveillance cameras
- Ensuring surveillance camera monitoring equipment is housed in a climate-controlled area

Management Response / Corrective Action Plan

Agree Disagree

- The existing camera system is not cost effective to repair and a quote for a new surveillance has been obtained. Because the existing camera system will not be repaired, DAS will not implement the first, second, and last bullet point of the above recommendation.
- DAS will create policy and procedures on the current surveillance system and train on overseeing, operating, and managing the system. The policy and procedures will be reviewed and amended as needed when the new system is obtained.
- DAS will have a routine monitoring and maintenance of the surveillance system.
- All DAS managers will be trained in the use of the surveillance system and maintenance of the system following the manufacturer's guidelines.
- DAS plans for the new surveillance system that only certain managers will have access to remotely review the system with the assistance of CIS and Network Security.

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Implementation Date

- Full Implementation June 30, 2019

Responsible Manager

- Manager II Business

Recommendation IX

We recommend the City Manager ensures DAS improves security protocols related to access to restricted areas, including eliminating the observed practices described above.

Management Response / Corrective Action Plan

Agree Disagree

- DAS will improve security protocols related to access to restricted areas. In addition, the policies and procedures for access to restricted areas will be further defined to ensure the protocols are followed.

Implementation Date

- September 30, 2017

Responsible Manager

- Manager II, Medical
- Manager II, Business

Recommendation X

We recommend the City Manager ensures DAS:

- Formalizes certain practices already used and also develops and / or revises policies and procedures and other documentation used to guide DAS personnel to reflect the Association of Shelter Veterinarians Guidelines for the Standards of Care in Animal Shelters for the areas identified in this audit: Animal Handling, Sanitation, Population Management, and Management and Recordkeeping
- Ensures policies and procedures are made available to DAS personnel responsible for conducting animal services operations

Management Response / Corrective Action Plan

Agree Disagree

- Animal Handling – DAS has partnered with the SPCA for training related to animal handling. DAS has begun to implement the training in our everyday duties. DAS continues to improve the training program and provide employees with the most up to date process and procedures.

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- Sanitation – DAS has changed to a new product and had the rep come out and spend 2 days assisting us with proper use of the product. We have updated the Work Instructions for cleaning.
- Population Management – DAS is working on an MOU with other organizations to assist with pulling more animals as well as dropping any barriers allowing transfers/rescues to pull animals as soon as they are available. DAS has increased surgery capacity which allows the animals to for shorter time frames, therefore creating more space for incoming animals.
- Business Administration is responsible for maintaining DAS Personnel files; these files are locked and access is granted to supervisors/managers only. The Administration department is responsible for generating monthly reports, disbursing and uploading onto shared departmental files. Business Administration is also responsible for generating customized reports for the various departments and maintaining the integrity of those reports within the Chameleon Report Directory file within the database.
- Full time employees have access to <http://4eval.com/Dallas> for all Work Instructions and use this daily. Temporary employees are given Work Instructions that pertain to their job duties when they start with DAS and are updated if there are any changes.

Implementation Date

- June 30, 2017

Responsible Manager

- Manager II, Business
- Senior Operations Manager

Recommendation XI

We recommend the City Manager develops policies and procedures related to DAS personnel training.

Management Response / Corrective Action Plan

Agree Disagree

- DAS has developed Policies and Procedures related to personnel training. The Policies and Procedures in place are currently being reviewed and updated. Each Policy or Procedure created or updated will be implemented immediately upon completion and ISO approval.
- Supervisors, Crew Leads and Animal Keepers are working side by side with temporary employees to ensure they are following proper procedures as well as providing guidance and training when needed.

Implementation Date

- September 30, 2017

Responsible Manager

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- Manager II – Business Administration

Recommendation XII

We recommend the City Manager ensures DAS conducts annual inspections of DAS as required in State Health and Safety Code Chapter 823.

Management Response / Corrective Action Plan

Agree Disagree

- DAS is currently reviewing established policies and procedures and will ensure that inspections are done annually by a staff veterinarian and are documented properly. DAS has a registered ISO 9001 Quality Management System, so all procedure changes must be documented, approved, implemented, tested, and revised according to ISO standards.


Implementation Date

- September 30, 2017


Responsible Manager

- Manager II – Business Administration

Sincerely,



A.C. Gonzalez
City Manager



Robert Sherwin, DAS
Deputy Chief of Police

C: