




OFFICE OF THE COUNTY AUDITOR

115 S. Andrews Avenue, Room 520 • Fort Lauderdale, Florida 33301 • 954-357-7590 • FAX 954-357-7592

April 23, 2020

Advisory No. 142

To: Bertha Henry, County Administrator
From: Bob Melton, County Auditor 
Subject: Interim Recommendations for the Animal Care and Adoption Division Audit

As you know, we are in the process of conducting our fieldwork for the audit of the Animal care and Adoption Division; however, we have noted areas where significant improvements are needed that require immediate corrective action by management. Because of this immediate need, we are issuing this Advisory without waiting for the completion of the audit.

1. Current Work Schedules are Inadequate to Maintain Animal Health and Well-being or Support Shelter Operations.

During our review of kennel operations, we noted the following items that require immediate attention:

- A. Kennel staff work 8-hour shifts, 10 a.m. to 6:30 p.m. on Tuesdays through Sundays and work 8 a.m. to 4:30 p.m. on Mondays and holidays when the facility is closed to the public. As a result:
 - i. Animals are left unattended for 16 to 18 hours without interaction with either other animals or humans. Leaving animals unattended for an excessive amount of time may impact animal medical and behavioral health.
 - ii. Cleaning begins within one hour of opening to the public at 11 a.m. which is insufficient time to address the quantity of animal waste which builds up within the kennel contributing to offensive odors within the kennels upon opening to the public.
 - iii. Cleaning is still in process upon opening resulting in hoses within walkways, and wet floors which increase the risk of injury to volunteers and members of the public.

- iv. Animals are fed shortly before opening hours increasing the likelihood that animals will produce waste during the hours the shelter is open to the public.
- B. Lighting to kennel areas is turned off at the end of each shift. Based on guidelines established by the Association of Shelter Veterinarians, “Facilities should be designed to offer as much natural light as possible. When artificial light is used, it should closely approximate natural light in both duration and intensity. Adequate amounts of darkness are as important as light. Light and darkness should be provided so that they support the natural (circadian) rhythms of wakefulness and sleep.” While there are some kennels in the shelter exposed to natural light, the majority are not, resulting in 16 to 18 hours of darkness for most animals in the shelter. Leaving animals in darkness for an excessive amount of time may impact animal medical and behavioral health.

Other work schedules and shifts should be utilized to reduce the number of hours animals are currently left unattended and in darkness. For example; Table A shows work shifts in Miami-Dade and Palm Beach Counties compared to Broward County;

Table A
Work Shifts at Miami-Dade, Palm Beach, Broward Counties’ Shelters

Shelter	Work Shifts	No. of Days open to the Public	Hours Open to the Public
Broward County	Monday (8 a.m. to 4:30 p.m.) Tuesday – Sunday (10 a.m. to 6 p.m.)	6 days per week	Monday (Closed) Tuesday – Sunday (11 a.m. to 6 p.m.)
Miami-Dade Animal Services Pet Adoption & Protection Center	Monday – Sunday (5:30 a.m. to 7 p.m.)	7 days per week	Monday – Friday (10 a.m. to 6:30 p.m.) Saturday – Sunday (10 a.m. to 4 p.m.)
Palm Beach County Animal Care and Control	Monday – Sunday (7 a.m. to 7 p.m.) Holidays (7 a.m. to 1 p.m.)	7 days per week	Monday – Friday (11 a.m. to 6 p.m.) Saturday (10 a.m. to 5 p.m.) Sunday (11 a.m. to 4 p.m.)

The work schedules in Miami-Dade and Palm Beach County Shelter reduce the number of hours animals are left unattended and in darkness to 10 to 12 hours.

We recommend management:

- A. Immediately adjust work schedules to, at minimum, 6 a.m. to 7 p.m. to:
 - i. Reduce the number of hours animals are left unattended.
 - ii. Facilitate the early removal of animal waste to reduce unpleasant odors upon opening.
 - iii. Complete major cleaning processes prior to opening to reduce hazards to volunteers and the public.
 - iv. Allow for early feeding to reduce the amount of animal waste produced during the hours the shelter is open to the public.
- B. Open the Shelter to the public on Mondays in alignment with Miami-Dade and Palm Beach Shelters.
- C. Implement a 10-hour workday, 4 days a week for kennel operations staff in order to accomplish the workday recommendation in A. above.

2. Kennels are not Appropriately Secured or Monitored During the Hours the Shelter is Open Increasing Risks to the Animals, Public, Volunteers and Staff.

During our review of kennel operations, we noted the following:

A. Kennels and cages at the shelter are not secured during the hours the shelter is open increasing the risk of injury to the animal, public, volunteers and employees. Anyone wandering the shelter, including volunteers, and members of the public can open kennels and cages and remove animals without employee supervision. Uncontrolled access to kennels and cages increases risks to animals, volunteers, the public, and employees, who may have to deal with incidents that occur. For example, on February 11, 2020, we observed an unaccompanied minor (less than 12 years old) open a cat enclosure and retrieve a cat. When questioned, the minor indicated that his family was going to adopt the cat.

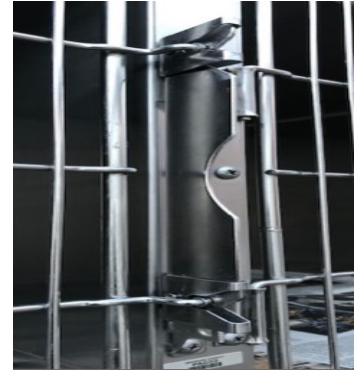


Figure 1 - Unsecured dog kennel latch can be opened by anyone

B. Dogs, either through shaking the kennel door are at times able to open kennel doors increasing the risk of injury to the animal, public, volunteers and employees. For example, on January 22, 2020, while the facility was open to the public, we observed that a dog was able to free himself from Kennel 177B-189. A volunteer, who happened to be present was able to retrieve and return the dog to the kennel without incident. Upon further inquiry, both volunteers and employees have acknowledged that dogs are able to get loose from time to time.

C. Kennel areas are not adequately monitored by employees during hours the shelter is open to the public to ensure the safety of members of the public, volunteers, and animals, and reduce legal liability.

a. We have observed kennel operations staff, cleaning and walking dogs throughout the day while volunteers and shelter visitors are generally unsupervised in Kennel areas. Volunteers have indicated during focus groups that it is difficult to find shelter staff when assistance is required.

b. We have observed hazards to employees, volunteers, and the public, such as spills from



Figure 2 - Urine in walkway during hours open to public at 11:10 am on January 24, 2020.

water bowls and the occasional urine in the walkway while volunteers and members of the public are present.

- c. During interviews with volunteers, we noted that volunteers have been bitten while attempting to handle a suddenly aggressive animal without employees being present in Kennel areas to assist.

Animals should be adequately secured while the shelter is open to the public, and employees should be actively monitoring kennel areas to ensure the safety of members of the public, volunteers, and animals.

We recommend management:

- A. Evaluate and implement procedures to lock kennels and cages while the shelter is open to the public.
- B. Assign staff to each kennel area to:
 - i. Monitor visitor and volunteer activities;
 - ii. Ensure the public's and animal safety while the shelter is open to the public;
 - iii. Perform spot cleaning of animal cages; and,
 - iv. Provide volunteer and customer service assistance.

At least one kennel operations staff should always be in each Kennel section during opening hours.

3. The Shelter is not Adequately Staffed to Maintain the Health and Well-being of Animals Resulting in Over Reliance on Volunteers to Provide Minimum Standards of Care.

In order to implement the recommendations in finding numbers 1 and 2 more staff are needed to improve kennel operations and maintain public and health and safety. We noted the shelter is not adequately staffed to provide a minimum standard of care.

- A. The National Animal Control Association (NACA) and the Humane Society of the United States (HSUS 2010) recommend a minimum of 15 minutes of care time per day for each animal housed in the shelter. Based on this estimate, and using only the shelter's capacity, not the population which fluctuates throughout the year, we estimate that the shelter requires 25 full time equivalents (FTE), after accounting for net available work hours in order to meet this minimum standard, assuming management implements all recommendations within this interim report. The shelter currently has

18 FTE and eight part time staff to support the minimum standard of care. Thus, an additional seven FTE are needed to provide sufficient staffing.

- B. The shelter does not have an adequate number of veterinarians to maintain the health and well-being of animals. There are two veterinarians on staff to manage a capacity of 450 animals resulting in approximately 225 animals per veterinarian which appears to be inadequate. We compared the number of animals per veterinarian in Miami-Dade, Palm Beach, and Broward County in Table B.

Table B
Number of Veterinarians Per Animal in Miami-Dade, Palm Beach, Broward Counties’ Shelters

Shelter	No. of Animals by Type	Total Animals	No. of Vets	No. of Animals per Vet
Broward County	Dogs: 153 Cats: 283	436	2 Full Time	218
Miami-Dade Animal Services Pet Adoption & Protection Center	Dogs: 366 Cats: 157	523	9 Full Time	58
Palm Beach County Animal Care and Control	Dogs: 237 Cats: 250 Chickens and Ducks: 420 Pigs: 8 Horses: 8 Cows/Sheep/Goats: 100 Rabbits: 25	1048	4 Full Time 1 Part Time	232*

* Palm Beach County Animal Care and Control is not comparable because of the variety of animals cared for that neither Miami-Dade nor Broward County accepts. Information for Palm Beach was included for completeness.

An inadequate number of veterinarians directly affects the shelters ability to provide appropriate medical care for each animal. ACAD should have sufficient veterinarians to ensure animals are adequately cared for.

C. The shelter does not have a certified animal behaviorist or trainer on staff to rehabilitate animals with behavioral issues and to assist in making animals more adoptable to reduce the risk of euthanasia. The County's No-Kill goal has resulted in longer animal stays to maximize the opportunities for positive outcomes. Animals with behavioral issues are typically placed in isolation areas with limited access if they pose potential danger to other animals, employees, volunteers, and members of the public. Animal Behaviorists and trainers supplement enrichment and work specifically with animals to assess and improve behavior to help in making the animal more adoptable. By properly utilizing an Animal Behaviorist or trainer, distressed animals can be identified earlier, and may result in the shelter being more proactive in identifying and resolving issues resulting in reductions in long-term stays, isolation, bite incidents, and ultimately euthanasia. Certifications for animal behaviorists and trainers include:

- i. Academy of Veterinary Behavior Technicians (AVBT) certification
- ii. American College of Veterinary Behaviorists (ACVB)-recognized certification
- iii. Animal Behavior Society: Associate Certified Applied Animal Behaviorist (ACAAB)
- iv. Animal Behavior Society: Certified Applied Animal Behaviorist (CAAB)
- v. Certification Council for Professional Dog Trainers (CCPDT) certification
- vi. International Association of Animal Behavior Consultants (IAABC) certification
- vii. Certified Professional Dog Trainer- Knowledge Assessed (CPDT-KA) certification.
- viii. Karen Pryor Academy Certified Training Partner (KPA-CTP) certification.
- ix. Canine Training Center (CTC) certification.

D. There is an inadequate number of volunteers daily to meet the needs of the shelter and make up for the lack of shelter staffing. Volunteers are used to augment shelter staffing and enrich the lives of animals; however, due to the lack of staffing, there is an over reliance on volunteers to meet minimum standards of care. This is especially noted on days that the shelter is closed to the public where fewer dogs are likely to receive walks.

According to management, the shelter needs 25 volunteers per day for all eligible tasks. We reviewed volunteer data for 470 days (the audit period) and noted the number of volunteers averaged 17, daily. The shelter had less than 25 volunteers 363 days or 77% of the days reviewed as shown in Table C.

Table C
Daily Volunteer Counts During the Audit Period

Number of Days	Daily Volunteer Count During the Audit Period
363 (77%)	24 or Less
61 (13%)	25 to 30
46 (10%)	31to 60

Management has limited influence over the number of volunteers that show up at the shelter daily and should be able to meet the minimum standards of care for each animal using only staff to maintain animal health and well-being.

We recommend management:

- A & D. Augment current kennel operations staff by seven FTE in order to meet minimum standards of care and facilitate kennel operations in the absence of volunteers.
- B. Hire one or more veterinarians in order to reduce the number of shelter animals per veterinarian.
- C. Hire one or more certified animal behaviorists or trainers or establish contractual relationships with third parties providing these services through a competitive procurement process.

4. *Enrichment Activities in the Shelter are Inadequate to Maintain Animal Health and Well-being.*

Enrichment activities at the shelter are inadequate to maintain the health and well-being of animals. “Enrichment refers to a process for improving the environment and behavioral care of confined animals within the context of their behavioral needs. The purpose of enrichment is to reduce stress and improve well-being by providing physical and mental stimulation, encouraging species-typical behaviors (e.g., chewing for dogs, scratching for cats), and allowing animals more control over their environment. During our review, we noted:

- A. There is no formal schedule, criteria, and documentation of enrichment activities for animals within the shelter. A formal enrichment program should be established that defines which activities are performed, how often, and which animals are eligible to participate. In addition, while enrichment experiences are provided, such as walks and playtime, management is unable to demonstrate if all animals participate in these experiences or the frequency of participation, because the experiences are not scheduled or documented. For example, management uses a whiteboard to document daily walks; however, the whiteboard is managed by volunteers and inconsistently updated by staff. The white board is erased each day and no permanent record is retained.
- B. Kennel operations staffing is inadequate to provide enrichment to sheltered animals. There is one Enrichment Coordinator position which was vacant for approximately three months during the audit period. This position is typically supported by kennel operations personnel in order to organize and support enrichment activities, including playgroups. However, as a result of current work schedules and the lack of staffing, both the Enrichment Supervisor and kennel operations staff are primarily involved in sanitation activities throughout the day, with little time left over for enrichment.

We recommend management immediately develop and implement a formal enrichment program to maintain the health and well-being of animals. Staffing recommendations in Finding #3 contemplate the use of additional kennel operations staff for enrichment.

5. Sanitation Systems Within the Shelter are Inadequate.

During our review of the sanitation procedures, we noted the following concerns that require immediate attention:

- A. The built-in Spray Master Technology (SMT) system, a pressure cleaning system used in the shelter to clean and sanitize animal enclosures while conserving water is not working as designed and requires immediate attention. The system currently does not have enough pressure to service multiple areas within the building. As a result, employees use spray bottles to deliver sanitizing agents and hoses for rinsing, which is not as efficient a method as a working SMT system.
- B. Procedures to prevent contamination and the spread of disease (Fomite control) within kennel operations need to be enhanced and immediately implemented to reduce contamination with pathogens that contribute to transmission of disease. A fomite is an object that may be contaminated includes cleaning instruments, the human body and clothing. Procedures are not adequate to require:

- i. Kennel operations staff, volunteers, and visitors to adequately sanitize hands before and after handling animals and potentially contaminated items.
- ii. Kennel operations staff to wear protective garments to be worn when handling vulnerable populations and changing garments after handling an animal with a diagnosed or suspected illness.
- iii. Kennel operations staff to sanitize all equipment that comes into contact with animals e.g. pooper scoopers, squeegees, brushes, and gloves in between sections.

During our daily observations, we observed that staff do not consistently adhere to appropriate anti-contamination procedures including:

- i. Kennel operations staff using same gloves to clean multiple sections of the section.
- ii. Lack of appropriate protective garments worn by staff in isolation rooms and kennels to prevent injury and to prevent contamination.
- iii. Kennel operations staff using the same equipment to clean multiple sections of the shelter without adequate sanitation between sections.

Adequate disease transmission control procedures in line with industry guidelines should be implemented to reduce the likelihood that contaminants and disease are spread throughout the facility.

We recommend management:

- A. Repair and/or enhance the SMT system so that it works as intended.
- B. Document disease transmission control procedures for kennel operations and ensure periodic training is conducted for all shelter staff and volunteers to ensure:
 - i. Adequate hand sanitization.
 - ii. Appropriate use of protective garments
 - iii. Adequate sanitization of equipment.

6. Animal Handling Training is Inadequate to Ensure the Safety of Employees and Volunteers.

Employees and volunteers are not adequately trained on animal handling procedures. Animal handling training is currently informal and typically handled through on-the-job training, volunteers train other volunteers and employees train other employees. As a result, animal handling procedures are inconsistently applied, and standards are unclear. Industry standards indicate that adequate training is key to limiting the use of unnecessary force during handling and must be provided to anyone who will be handling animals. The ability to handle animals safely is key to the functions performed by shelter employees and volunteers. Animal handling training should be conducted during the onboarding process and periodically refreshed to ensure the safety of employees, volunteers, animals, and members of the public. Failure to provide adequate training increases risk of injury to both animals and human handlers.

ACAD has incurred liability claims of \$22,000 for animal bites during the audit period for volunteers and the public and \$27,000 in workers compensation claims for animal bites for employees.

We recommend management implement formal animal handling training during the onboarding of employees and volunteers. Refresher training should be conducted at least annually or when animal handling standards or procedures are updated.

7. Parking at the Shelter is Inadequate to Support Shelter Operations and Facilitate Easy Access to the Public.

During our review of parking at ACAD, we noted 52% to 68% of the 44 parking spaces available to the public are utilized by employees and volunteers. As a result, visitors to the shelter often wait for parking spots to become available and occasionally must park along the roadway increasing risk of injury.

In order to make additional spaces for visitors in the front, employees and County vehicles are parked in non-paved grassy areas that were not designed for parking. These areas often hold water for several hours after heavy rain.



Figure 3 - Visitors Parking Along Roadway on January 18, 2020

ACAD has 36 paved parking spaces at the back of the building for employees and 44 parking spaces at the front of the building for use by volunteers and members of the public. There are



Figure 4 - County vehicles parked in water retention area after heavy rain on December 23, 2019

78 current employees but only 36 paved parking spaces available behind the building. In addition, there are 44 parking spaces in front of the building for use by the public, volunteers, and employees who are unable to park in the back. ACAD should have sufficient parking spaces to facilitate operations in order to fulfill its mission.

The Parks and Recreation Department is in the process of constructing parking for a boat ramp adjacent to the shelter which may be used to handle overflow public parking from the shelter until a permanent solution is identified.

We recommend management increase the number of parking spaces at the shelter in order to facilitate access by the public, volunteers, and staff. In the interim, management should consider using the boat ramp parking lot currently under construction adjacent to the shelter for overflow public parking.

8. Animal Shelter has Design Flaws that Require Remediation and was not Designed to Support the County's Goal of "No-Kill".

During our review of the animal shelter, we noted the following concerns:

- A. The Heating, Ventilation and Air Conditioning (HVAC) system is not adequately designed to support animal shelter operations. The current system does not adequately separate air between animal housing areas and administrative areas used by staff and members of the public. In addition, the air exhaust taking air out of the system is too close to the air intake resulting in the recirculation of bad air. Both these issues affect air quality within the building and contribute to unpleasant odors.

In August 2019, Mechanical Air Concepts conducted an evaluation of the HVAC system, and in November 2019, Delta G consulting Engineers, working with Saltz Michelson Architects, prepared an assessment for the County which identified deficiencies with the HVAC system within the Shelter. The recommendations included the following:

- i. Provide a 100% outside air unit for the lobby and all corridors in the administration area and in the kennels. (Separate the animal occupancies from the human occupancies).

- ii. Increase the air exchange rate to minimum 10 air exchanges per hour.
- iii. Provide dedicated exhaust fans for all animal occupancies.
- iv. Add filtration to the exhaust grilles in the kennels, if practical, or provide consistent maintenance of the grilles.
- v. Extend the outside air intakes on the roof away from the air exhaust locations.
- vi. Modify the existing Aeon unit controllers with Siemens control as required to allow the Broward County Head End to change unit parameters remotely.

As of March 17, 2020, these recommendations have not yet been implemented.

B. The Animal Shelter was not designed with the County's "no-kill" goal as a requirement. We noted that the design of the facility does not appear to adequately address the County's following objectives to support "No-Kill".

- i. The shelter is not designed to provide alternate housing based on length of stay, which has been identified as a risk factor for animal physical and psychological well-being. As the length of stay increases, it becomes progressively more important to provide space that is both mentally and physically stimulating. According to the Association of Shelter Veterinarians' guidelines, for animals housed long term the physical environment must include opportunities for:
 - a. Hiding, playing, resting, feeding, and eliminating.
 - b. Protected indoor-outdoor access. Outdoor spaces must be suitable enclosed to protect from adverse weather, vandalism, and prevent escape or predation.
 - c. Group housing and participation in supervised playgroups for exercise and social enrichment.

Resolution 2012-271 by the Broward County Board of County Commissioners pertaining to the establishment of a program for Broward County with the goal of becoming a no kill community was approved on April 3, 2012. At this time the shelter's predesign phase was complete, and the schematic design phase was in process. See construction project timeline in Table B.

Table B
Animal Shelter Construction Project Timeline

DESCRIPTION	START DATE	END DATE
Predesign kickoff of applicable or NTP for Predesign/ Programming	7/24/06	2/12/10
NTP for Schematic Design	2/12/2010	
No Kill Policy Approved	April 3, 2012	
NTP for Schematic Design (Continued)		9/10/2012
NTP for Design Development	9/10/2012	1/17/2014
NTP for Construction Documents	1/17/2014	9/29/2014
Permit submittal	9/29/2014	3/1/16

During inquiries with the Construction Management Division, they indicated there was no record or knowledge of a request to modify the construction program or adjust the design to suit the policy. Enhancements to the shelter may be possible in order to more adequately support the County’s “No-Kill” goal.

We recommend management:

- A. Implement all recommendations in the consultant reports to address issues with the HVAC System.
- B. Review current shelter design and develop a plan for enhancements that would support the County’s “No-kill” goal.

9. Behavior Assessments are Not Performed Consistently.

Behavioral health practices and protocols are not adequate to maintain animal health and well-being. During our review of the animal shelter, we noted the following concerns:

- A. Standard Operating Procedures (SOP) regarding behavior do not align with national guidelines. Current SOPs do not address:
 - i. Ongoing assessment of each animal’s behavior throughout the animal’s stay in the shelter.
 - ii. Staff and volunteer training on identifying and recording/reporting behaviors.

- iii. Assessment of the appropriateness of housing that meets the behavioral needs of the animals to minimize stress.
 - iv. Training programs for dogs and cats to teach basic obedience commands as an important source of stimulation and social contact.
 - v. “Alternatives to traditional cage housing (e.g., large enriched cages, home or office foster care, room housing) to be provided for any animal staying in the shelter long term.”
 - vi. Which national standards are followed by ACAD regarding assessment of animal behavior?
- B. Dogs do not consistently receive behavior classifications either during the intake process or periodically throughout shelter stays. We selected a sample of 50 dogs that entered the shelter during the audit period and noted the following:
- i. Twenty-three of 50 (46%) dogs did not receive a behavior classification during intake as required by the shelter’s intake policies.
 - ii. Seventeen of 50 (34%) dogs in the shelter between 0 – 30 days did not receive a behavior classification.
 - iii. Three of 9 dogs (33%) in the shelter over 30 days did not receive a periodic evaluation.

According to industry guidelines, assessment of an animal’s behavior must begin at the time of intake. Just as care is taken to note any physical problems that may require attention, behavioral problems (stress, fear, anxiety, aggression) that require intervention or affect how that animal can be safely handled should also be noted at the time of intake and entered into an animal’s record. Actions should be taken to respond promptly to behavioral needs. In addition, ongoing assessment of each animal’s behavior should continue throughout the animal’s stay in the shelter.

Failure to perform behavior assessments timely may hamper management’s ability to identify behavioral issues that require remediation in order to facilitate positive outcomes. Failure to perform periodic assessments for animals in the shelter may hamper management ability to proactively identify changes to animal behavior that require intervention.

We recommend management:

- A. We recommend management enhance behavioral health practices and protocols to align with national standards.

- B. Ensure all dogs receive a behavior evaluation as required by policy and ensure behavior evaluations are performed periodically for animals in the shelter over 30 days.

I hope you find this information helpful. If you would like to discuss further, please feel free to contact me.

CC: Broward County Board of County Commissioners
Andrew Meyers, County Attorney
Monica Cepero, Deputy County Administrator
Henry Sniezek, Director, Environmental Protection and Growth Management
Alessandra Medri, Interim Director of Animal Care and Adoption Division