March 13, 2015

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Shirley Gonzales  
Councilwoman, District 5

Ron Nirenberg  
Councilman, District 8

SUBJECT: Audit Report of Animal Care Services Dispatching and Operations

Mayor and Council Members:

We are pleased to send you the final report of the Audit of Animal Care Services Dispatching and Operations. This audit began in July 2014 and concluded with an exit meeting with department management in February 2015. Management’s verbatim response is included in Appendix B of the report. The Animal Care Services Department management and staff should be commended for their cooperation and assistance during this audit.

The Office of the City Auditor is available to discuss this report with you individually at your convenience.

Respectfully Submitted,

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
City of San Antonio
Distribution:
Sheryl L. Sculley, City Manager
Gloria Hurtado, Assistant City Manager
Ben Gorzell, Chief Financial Officer
Kathy Davis, Animal Care Services Director
Martha Sepeda, Acting City Attorney
Leticia M. Vacek, City Clerk
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Cary Clack, Communications Director, Office of the Mayor
Yolanda Oden, Executive Assistant to the Mayor, Office of the Mayor
Edward Benavides, Chief of Staff, Office of the City Manager
Donald Crews, Audit Committee Member
Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted an audit of the Animal Care Services (ACS) Department, specifically dispatch and operations of Animal Control Officers. The audit objective and conclusion follow:

Are dispatching and operations of Animal Control Officers effective, efficient, and in accordance with policies?

Yes, dispatching and operations of Animal Control Officers are effective, efficient, and in accordance with policies. Officer activities are appropriately prioritized and aligned with strategic goals. Additionally, the department is in the process of standardizing its documentation, which will facilitate greater accountability. However, we identified the following areas that need improvement:

- Supervisory review over daily activities including investigations, inspections, and responses to 311 calls for service.
- Officer compliance with guidelines related to aggressive and dangerous dogs, bites, and permits.

Animal Care Services Management agreed with the audit findings and has begun to develop positive action plans to address them. Their verbatim response to our recommendations is in Appendix B on page 8.
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Background

Animal Care Services’ (ACS) mission is to encourage responsible pet ownership by promoting and protecting the health, safety, and welfare of residents and pets of San Antonio through education, enforcement, and community partnership.

Using input from City Council, the Animal Care Services Advisory Board, staff, and others, ACS has prioritized (1) enhanced enforcement of existing laws and codes, (2) controlling the stray animal population, and (3) increasing the live release rate. To assist in reaching these goals, ACS has implemented initiatives including the ACS Field Training Academy, targeted Comprehensive Neighborhood Sweeps, and closer ties with rescue partners.

Animal complaints or requests for service by citizens are logged in the Customer Relationship Management (CRM) system by 311 staff and sent to Chameleon, ACS’s application to manage and track data. Chameleon is used to record the impounding of animals, medical treatment, dispatching, citations, etc. Through Chameleon, Animal Control Officers (Officers) are able to respond and communicate with the dispatch office and update records while in the field.

Higher priority requests for service are dispatched and assigned in Chameleon immediately. Service level agreements are assigned to each type of request based on their priority. Completing requests for service timely is critical because it impacts the safety and welfare of residents and pets.

Officers are responsible for following up on specific types of calls including dangerous dogs, animal bites, and animal cruelty. Officers investigate aggressive and dangerous dogs when citizens submit an affidavit stating that an aggressive or dangerous act has taken place. If a dog is designated as dangerous, it is monitored annually to ensure public safety. Two Officers focus on these tasks. Similarly, Officers investigate reported bites and cruelty towards animals. Four Officers are assigned to bite investigations; they are responsible for documenting the incidents and quarantining the animals. Four Officers are also assigned to cruelty investigations; for cases of severe cruelty and unresolved cruelty violations, the animals are impounded. When sufficient evidence is obtained, criminal cases are filed.

In addition to responding to 311 calls and performing investigations, Officers are responsible for monitoring permits. Permits are required to ensure the humane, responsible treatment of animals in residential and commercial settings. For example, annual permits and inspections by Officers are required for pet shops, grooming shops, and animal exhibits. Residents with litters, cat colonies, excess animals, or livestock must also obtain permits and allow inspections.
Audit Scope and Methodology

The audit scope was fiscal year 2014, including activities recorded in Chameleon for the period of October 1, 2013 through July 31, 2014.

To obtain an understanding of the dispatching and operation processes, we interviewed staff and observed controls. Testing criteria included ACS policies and procedures; City Code, Chapter 5; Texas Health and Safety Code, Title 10, Chapter 829; Administrative Directive (AD) 4.8, City Driver Evaluations; and AD 7.8d, Access Control.

We reviewed ACS’s monitoring of Officers’ processes and tracking of citations, calls for service, and impoundments via Chameleon system generated reports. We also verified that support is kept for the year to date totals and for variances when applicable.

We tested random samples of 25 cruelty investigations, 25 bite investigations, and 25 dangerous or aggressive dog investigations to determine if Officers followed departmental policies. We also tested a random sample of 15 dogs that have been designated as dangerous or aggressive to determine if they were adequately monitored by Officers.

We tested a random sample of 23 current permits to determine if inspections were timely. Additionally, we tested a random sample of 19 expired permits to determine if follow up was performed.

We verified that Dispatch was compliant with departmental policies. We selected a random sample of 5 days and verified that calls (10 per day) were correctly prioritized and appropriately closed, cancelled, or dispatched. We also determined if Officers were following departmental policies when responding to calls for roaming and stray animals.

We verified that driver evaluations were performed, defensive driving courses were completed, and Officers documented the condition of their vehicles.

To determine if training was provided, we tested a random sample of 10 Officers. We also tested Chameleon user access for all Officers and evaluated password requirements.

We relied on computer-processed data in SAP, the City’s financial system, and Chameleon, ACS’s application for recording and analyzing data, to verify that dispatching and operations were timely and appropriate. Our reliance was based primarily on performing direct tests on the data rather than evaluating the systems’ general and application controls. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.
We conducted this audit 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 audit results and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our audit results and conclusions based on our audit objectives. Our audit included tests of management controls that we considered necessary under the circumstances.
Audit Results and Recommendations

A. Insufficient Supervisory Review

Supervisors provide insufficient review over daily activities including investigations, inspections, and responses to 311 calls for service.

Daily worksheets, which summarize the Officers’ activities, were not adequately reviewed by supervisors. Exceptions were noted for 22 of 25 (88%) worksheets sampled. Seven worksheets could not be located for testing and 15 had no evidence of review by supervisors.

ACS policy 37-11-009: Officer Daily Worksheet requires that supervisors review and sign the worksheets to ensure compliance with the policy.

Additionally, the supervisors do not review and sign-off on bite cases where there is a failure to quarantine, as required by ACS policy 37-06-03: Animal Bite Investigation.

Regular reviews of daily activities would ensure that the Officers’ actions are appropriate, timely, and adequately documented in Chameleon. Not performing these reviews increases the risk of non-compliance to policies and procedures and data entry errors in Chameleon.

Recommendation

The Director of ACS should develop policies to increase supervisory review of daily worksheets and Officer activities including investigations, inspections, and responses to 311 calls for service.

B. Inconsistent Compliance with Guidelines

Officers do not consistently follow guidelines related to aggressive and dangerous dogs, bites, and permits.

Aggressive and Dangerous Dogs

Annual inspections are not current for 11 of 15 (73%) aggressive or dangerous dogs tested. Additionally, Officers are not presenting unfounded cases to management.

City Code, Chapter 5 states that Officers are responsible for annual compliance inspections and ensuring the owners continued compliance. Additionally, ACS policy 37-06-002: Aggressive and Dangerous Dog Investigations requires the
Officer to create a letter for management recommending the course of action to take. However, the Officers were only presenting cases in which the dog might be categorized as dangerous or aggressive, not those that were unfounded.

A lack of inspections increases the risk of harm from aggressive and dangerous dogs. Additionally, having only one person review the affidavits and other evidence increases the chance that a dangerous or aggressive dog might not be categorized as such, possibly causing harm to the public.

**Bites**

Citations related to bite incidents are not consistently issued. Specifically, citations were not issued for 5 of 11 (45%) incidents of unprovoked bites tested.¹

ACS policy 37-06-003: *Animal Bite Investigations* provides guidelines for Officers including, “Issue appropriate citations to the owner of the biting animal (no rabies, license, loose).”

To align Officer actions with the strategic goal of enhanced enforcement, citations should generally be issued when responding to a biting animal. Officers were provided additional guidelines in April 2014 to address this issue. These guidelines require the responding Officers to fully investigate and take enforcement action for any related violations.

**Permits**

Follow up for expired permits is not consistently performed by Officers. Exceptions were noted for 17 of 19 (89%) of expired permits sampled. Support documentation for 1 could not be located, while 12 others had no follow up. Additionally, 4 of the 19 expired permits had documentation showing that they were no longer needed; however, the invoices for the following years’ permits were not cancelled in SAP.

Per the supervisor, the Officer will follow up on expired permits to determine if they should be cancelled or if a violation of City Code, Chapter 5 has occurred. When permit holders such as pet stores, owners with livestock, and owners with excess animals do not renew their permits and obtain the accompanying inspections, the risk of unsafe environments and other City Code, Chapter 5 violations is increased. Additionally, not updating SAP records to reflect cancelled permits results in overstated receivables.

**Recommendation**

The Director of ACS should ensure that supervisory review is sufficient to adequately monitor Officers’ compliance with guidelines and any significant

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¹ Excludes unprovoked bites in which the owner could not be identified.
deviations. Tracking of activities should be sufficiently detailed to allow management to determine if additional resources are needed to complete tasks timely.
Appendix A – Staff Acknowledgement

Sandy Paiz, CFE, Audit Manager
Rebecca Moulder, CIA, Auditor in Charge
Michelle Garcia, CPA, Auditor
Reina Sandoval, Auditor
Appendix B – Management Response

January 26, 2015

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
San Antonio, Texas

RE: Management’s Corrective Action Plan for the Audit of Animal Care Services
   Department Dispatching and Operations

Animal Care Services Department has reviewed the audit report and has developed the Corrective Action Plans below corresponding to report recommendations.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Audit Report Page</th>
<th>Accept/Decline</th>
<th>Responsible Person’s Name/Title</th>
<th>Completion Date</th>
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<td><strong>1 Insufficient Supervisory Review</strong></td>
<td>4</td>
<td>Accept</td>
<td>Shannon Simms, Field Officer Manager</td>
<td>Completed December 2014</td>
</tr>
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</table>

**Action plan:**
In December 2014, ACS converted its Daily Worksheet into an electronic system where the officer completes the form directly from their laptop and then sends it to their supervisor via e-mail. The supervisor reviews the log and electronically approves it.

A monthly summary report is now created and is reviewed and discussed each week by Field Management where corrective action for those employees not in compliance with the Departmental policy is determined. Through this process, supervisors and officers can be held accountable for their responsibilities.
### Recommendation

<table>
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<tr>
<th>#</th>
<th>Description</th>
<th>Audit Report Page</th>
<th>Accept, Decline</th>
<th>Responsible Person's Name/Title</th>
<th>Completion Date</th>
</tr>
</thead>
<tbody>
<tr>
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<td>Inconsistent Compliance with Guidelines</td>
<td>5</td>
<td>Accept</td>
<td>Shannon Simms, Field Officer Manager</td>
<td>Completed February 2015</td>
</tr>
</tbody>
</table>

#### Action plan:

As part of the Electronic Road Logs System, established in December 2014 and in connection with Recommendation #1 of this audit, Officers are identifying the number of citations issued for each service request. Officers will also include in the road log notes identifying which citations were issued. This way, Supervisors will have the ability to review daily which citations were issued and to ensure that any deviation from the citation guideline is appropriate.

In January 2015, ACS established a new automatic tracking system in Chameleon (ACS’s database system) for ACS permits. This system creates an easy way for supervisors to review where permits requests are in the approval process and which permits have expired. In February 2015, all aggressive and dangerous dog investigations were included in this process to ensure that they are renewed annually.

In addition, effective January 2015, Supervisors meet monthly with each officer to review, among other things, the number of calls-for-service requests responded to, the number of pets impounded, and the number of citations issued. This meeting gives the supervisors another opportunity to review what citations are being issued and to provide instruction to the officers.
We are committed to addressing the recommendations in the audit report and the plan of actions presented above.

Sincerely,

[Signature]
Kathy Davis
Director
Animal Care Services Department

[Signature]
Gloria Hurtado
Assistant City Manager
City Manager's Office

3-4-15
Date

3/5/2015
Date