

Clerk of the Circuit Court and Comptroller  
Regular Public Meeting  
July 21, 2015

2. Reports received for filing:

- a. Division of Inspector General, Clerk of the Circuit Court and Comptroller, Report No. 2015-12 dated June 4, 2015 – Follow-Up Audit of Service & Maintenance Contracts for Parks and Conservation Resources.
- b. Division of Inspector General, Clerk of the Circuit Court and Comptroller, Report No. 2015-13 dated June 18, 2015 – Audit of St. Petersburg-Clearwater International Airport Lease and Concession Agreement with Stellar Partners, Inc.
- c. Division of Inspector General, Clerk of the Circuit Court and Comptroller, Report No. 2015-20 dated July 1, 2015 – Audit of Animal Services Operations and Internal Controls.
- d. Dock Fee Report for the month of May 2015.



## **DIVISION OF INSPECTOR GENERAL**

**KEN BURKE, CPA**

**CLERK OF THE CIRCUIT COURT AND COMPTROLLER**

**PINELLAS COUNTY, FLORIDA**

# **AUDIT OF ANIMAL SERVICES OPERATIONS AND INTERNAL CONTROLS**



**Hector Collazo Jr., Inspector General/Chief Audit Executive**

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**JULY 1, 2015  
REPORT NO. 2015-20**



## **Ken Burke, CPA**

CLERK OF THE CIRCUIT COURT AND COMPTROLLER  
PINELLAS COUNTY, FLORIDA

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Recorder of Deeds  
Clerk and Accountant of the Board of County Commissioners  
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July 1, 2015

The Honorable Chairman and Members of the Board of County Commissioners

We have conducted an audit of the Pinellas County Animal Services (Animal Services) Operations and Internal Controls. Our audit objectives were to determine:

- Adequacy of internal controls.
- Compliance with Florida Statutes and County Ordinances.
- Compliance with Contract and Inter-Local Agreement terms.
- Effectiveness of partnerships with Volunteer Services, rescue organizations, and the Society for the Prevention of Cruelty to Animals (SPCA).

We conclude that Pinellas County Animal Services (Animal Services) is complying with applicable Florida Statutes, County Ordinances, Contracts, and Inter-Local Agreements. Overall, the facility is well maintained; however, we noted that some facility and maintenance issues exist. Partnership agreements are effective and Animal Services management strives to continue relationships with partners to provide the best chance for animal adoptions and rescues.

Opportunities exist to enhance the effectiveness and efficiency of partnership activities, field services (animal enforcement), and administration through system automation. Our review and testing of controls for operational processes indicate that controls are weak due to lack of policies and procedures and/or inappropriate segregation of duties. Oversight of the Animal Welfare Trust Fund is adequate; however, transparency of the sources, expenditures, and projections of the fund to the public is not adequate.

During the onset and performance of our audit, various complaints were received by former volunteers of Animal Services and citizens regarding activities at Animal Services. The complaints were reviewed by our office and incorporated into our audit work program. References to these complaints are documented in a table on the last page of our report.

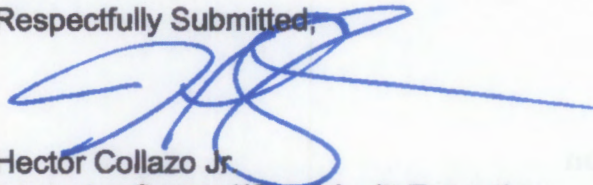
Opportunities for Improvement are presented in this report.



The Honorable Chairman and Members of the Board of County Commissioners  
July 1, 2015  
Page 2

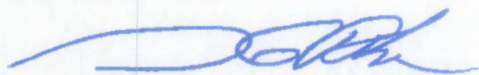
We appreciate the cooperation shown by the staff of Animal Services during the course of this review. We commend management for their responses to our recommendations.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to be "Hector Collazo Jr.", written over the text "Respectfully Submitted,".

Hector Collazo Jr.  
Inspector General/Chief Audit Executive

Approved:

A handwritten signature in blue ink, appearing to be "Ken Burke", written below the word "Approved:".

Ken Burke, CPA\*  
Clerk of the Circuit Court and Comptroller  
Ex Officio County Auditor  
\*Regulated by the State of Florida



# TABLE OF CONTENTS

	<b>Page</b>
<b>Introduction</b>	<b>5</b>
<b>Action Plan</b>	<b>7</b>
<b>Opportunities for Improvement</b>	
1. The Segregation Of Duties For Accounting Processes Is Not Adequate.	17
2. Controls Over Manual Receipts Are Not Adequate.	19
3. Some Facility And Maintenance Issues Exist At Animal Services.	21
4. Standard Operating Procedures For Canine Evaluations Are Not Complete.	34
5. There Are No Written Policies And Procedures For After-Hours Emergency Care.	37
6. There Is No Formal Quality Assurance Program Subsequent To The Disposition Of Animals.	38
7. Controls Over Pet License Tags Are Not Adequate.	40
8. There Is No Administrative Manual Which Documents All Accounting Related Processes.	43
9. Increased Financial Transparency Is Needed For The Animal Welfare Trust Fund.	44
10. There Are No Written Policies And Procedures For Animal Control Officers' Functions.	45
11. Staffing Levels For Animal Control Officers May Be Inadequate.	47
12. Utilize PetPoint System Functionality To Enhance Efficiency And Effectiveness Of Operations.	48
<b>Citizens' Complaints</b>	<b>52</b>

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# INTRODUCTION

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## ***Synopsis***

Pinellas County Animal Services is in compliance with applicable Florida Statutes, County Ordinances, as well as Contract and Inter-Local Agreement terms. Partnership programs are operating effectively; however, opportunities exist for automation to enhance effectiveness and efficiency. Internal controls are not adequate for administrative, field services (animal enforcement), and facility/maintenance related processes. Transparency of the Animal Welfare Trust Fund should be available to the public.

## ***Scope and Methodology***

We conducted our audit of the Pinellas County Animal Services (Animal Services) Operations and Internal Controls, which included evaluating administrative, field services (animal enforcement), and facility processes, testing operational compliance with Florida Statutes, County Ordinances, and contract agreements, and evaluating the effectiveness of partnership programs.

The objectives of our audit were to determine:

- Adequacy of internal controls.
- Compliance with Florida Statutes and County Ordinances.
- Compliance with Contract and Inter-Local Agreement Terms.
- Effectiveness of Partnerships with Volunteer Services, rescue organizations, and the Society for the Prevention of Cruelty to Animals (SPCA).

In order to meet these objectives we:

- Interviewed management and staff to obtain an understanding of operational processes, including those related to animal impounds through the disposition phase of the animal.
- Reviewed and tested the controls, on a sample basis, and the processes related to administration, animal impounds through disposition, facility/maintenance, and field services.
- Toured the public and administration facility areas on an ongoing basis, including kennels and cat shelters, and field services by riding along with Animal Control Officers during assigned work days.
- Reviewed and tested, on a sample basis, operational compliance with applicable Florida Statutes and County Ordinances.
- Evaluated Animal Services operational practices with other state and national best practices for animal shelters.

- Reviewed and tested, on a sample basis, compliance with Contracts and Inter-Local Agreement terms.
- Reviewed partnership agreements and documents, policies and procedures.
- Interviewed and performed a ride-along with Animal Services Coordinators to gain an understanding of partnership processes.

Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* and the *Principles and Standards for Offices of Inspector General*, and accordingly, included such tests of records and other auditing procedures, as we considered necessary in the circumstances. The audit period was October 1, 2012 through December 31, 2014. However, transactions and processes reviewed were not limited by the audit period.

## **Overall Conclusion**

We conclude that Animal Services is providing services in accordance with applicable Florida Statutes and County Ordinances. Overall, the facility is well maintained; however, some facility and maintenance issues exist. Partnership agreements are effective and Animal Services management strives to continue relationships with partners to provide the best chances for animal adoptions and rescues. Nonetheless, we noted opportunities to enhance the effectiveness and efficiency of partnership activities, field services (animal enforcement) and administration through system automation. Our review and testing of controls for operational processes indicated that controls are weak due to lack of policies and procedures and/or inappropriate segregation of duties. Oversight of the Animal Welfare Trust Fund is adequate; however, financial transparency of the sources, expenditures, and projections of the fund to the public is not adequate.

During our audit, various complaints were received from former volunteers of Animal Services and citizens regarding activities at Animal Services. The complaints were reviewed by our office and incorporated in our audit work program. These complaints are documented in tables at the end of the report.



## Action Plan

FINDING NO.	FINDING (CAPTION) RECOMMENDATIONS	MANAGEMENT RESPONSES			IMPLEMENTATION STATUS	
		Concur	Partially Concur	Do Not Concur	In Progress	Planned
<b>1</b>	<b>The Segregation of Duties For Accounting Processes Is Not Adequate.</b>					
	A. 1. Disable cash register system access for the three accounting employees. 2. Assign a Supervisor or Manager the responsibility to authorize voided cash register transactions.	✓			✓	
	B. Require that a Supervisor or Manager review and approve all purchasing card statements. Employees should submit a reconciliation, along with the appropriate backup and purchasing card statement to the Supervisor or Manager.				✓*	
	C. Segregate the responsibilities of staff ordering and receiving supplies, approving and initiating payments in OPUS. The departments requesting and receiving supplies should not have the ability to modify or approve the order placed by the Administrative/Accounting section in the OPUS system.	✓			✓*	
<b>2</b>	<b>Controls Over Manual Receipts Are Not Adequate.</b>					
	A. Implement a procedure which requires the Animal Control Officers (ACO) and/or other designated employees to obtain the cashier's initials and system generated receipt number on the pink receipt copy.	✓			✓	✓



Introduction  
Animal Services Operations and Internal Controls

FINDING NO.	FINDING (CAPTION) RECOMMENDATIONS	MANAGEMENT RESPONSES			IMPLEMENTATION STATUS	
		Concur	Partially Concur	Do Not Concur	In Progress	Planned
	B. 1. Implement standardized written policies and procedures for monitoring manual receipt books issued. All employees should be trained on these policies and procedures. 2. Require all Supervisors to periodically review employee receipt books. The requirement for the review and frequency should be documented in the written policies and procedures implemented.	✓			✓	
3	<b>Some Facility And Maintenance Issues Exist At Animal Services.</b>					
	A. Install and activate electronic entry to both doors located in the Adoption Kennel for Animal Services and Volunteers. Access cards issued to Volunteers should be monitored by management.	✓			✓*	
	B. Evaluate and implement alternatives to establish and maintain the recommended best practice temperature range.	✓			✓	✓
	C. Consult Real Estate Management department staff to address the maintenance issues in the kennel areas.	✓			✓*	✓
	D. Move the supply of needles and syringes to a locked room or use a cabinet/cage with a lock in the Central File room. In either case, access should be limited.	✓			✓*	
	E. Prepare a formal written emergency preparedness plan to include, at a minimum, the following: 1. Assessment of risks for the facility. 2. Development of an emergency response plan for each potential risk identified.		✓		✓	
	F. Develop and implement formal written policies and procedures for the use of the security camera system to include the		✓		✓	



Introduction  
Animal Services Operations and Internal Controls

FINDING NO.	FINDING (CAPTION) RECOMMENDATIONS	MANAGEMENT RESPONSES			IMPLEMENTATION STATUS	
		Concur	Partially Concur	Do Not Concur	In Progress	Planned
	<p>following specifics:</p> <ol style="list-style-type: none"> <li>1. Placement of cameras.</li> <li>2. Access and monitoring roles.</li> <li>3. Appropriate Use and Confidentiality.</li> <li>4. Use of Cameras for Investigations.</li> <li>5. Storage and Retention of Recordings.</li> </ol>					
4	<b>Standard Operating Procedures For Canine Evaluations Are Not Complete.</b>					
	<p>A. Update the Standard Operating Procedures for dog exams to include guidelines for completing the Canine Evaluation Form. The guidelines should require:</p> <ol style="list-style-type: none"> <li>1. Dual signatures as evidence that procedures are adhered to.</li> <li>2. Documentation of borderline behavior issues.</li> <li>3. Signature of the authorized employee making the final behavior evaluation.</li> </ol>	✓			✓	
	<p>B. Develop and implement written policies and procedures for the processes used to re-examine animals for adoptions, and exams for animals found dead in pens. The Canine Evaluation form used for adoption screening should also be used when re-examining dogs.</p>	✓			✓	
5	<b>There Are No Written Policies And Procedures For After-Hours Emergency Care.</b>					
	Develop formal written policies and procedures for after-hours emergency care.	✓			✓*	



Introduction  
Animal Services Operations and Internal Controls

FINDING NO.	FINDING (CAPTION) RECOMMENDATIONS	MANAGEMENT RESPONSES			IMPLEMENTATION STATUS	
		Concur	Partially Concur	Do Not Concur	In Progress	Planned
<b>6</b>	<b><i>There is No Formal Quality Assurance Program Subsequent To The Disposition Of Animals.</i></b>					
	Develop and implement a written Quality Assurance Program to review the activities of animals impounded through disposition.	✓			✓*	✓
<b>7</b>	<b><i>Controls Over Pet License Tags Are Not Adequate.</i></b>					
	A.1. Implement a written procedure requiring a reconciliation of the Animal Services "Tags Issued, Not Sold" report on a regular basis. The reconciliation should be completed by someone independent of the cashier function. 2. File voided tags/licenses in a separate file.	✓			✓	
	B. Implement a written procedure requiring license tags be kept in a locked cabinet or other designated secure location	✓			✓	
	C. Develop written policies and procedures for the processes related to the issuance of license tags. The policies and procedures could potentially be written into an Accounting and/or Administration manual.	✓			✓	
<b>8</b>	<b><i>There Is No Administrative Manual Which Documents All Accounting Related Processes.</i></b>					
	Develop an Administrative Manual for accounting functions, which includes: A. Written policies and procedures for all processes, to include compatibility with the new software system. B. Examples of forms and documents used in the processes. C. Segregation of duties. D. Supervisor responsibilities.		✓		✓	



Introduction  
Animal Services Operations and Internal Controls

FINDING NO.	FINDING (CAPTION) RECOMMENDATIONS	MANAGEMENT RESPONSES			IMPLEMENTATION STATUS	
		Concur	Partially Concur	Do Not Concur	In Progress	Planned
9	<b>Increased Financial Transparency Is Needed For The Animal Welfare Trust Fund.</b>					
	Provide transparency to the public on resources and expenditures of the fund, and projected short and long term plans for uses of the fund.		✓			✓
10	<b>There Are No Written Policies And Procedures For Animal Control Officers' Functions.</b>					
	Develop formal written policies and procedures for Animal Control Officers for all on-site and field processes.	✓			✓	
11	<b>Staffing Levels For Animal Control Officers May Be Inadequate.</b>					
	Compare their actual staffing levels to those described in the Florida Animal Control Association best practices. Any significant differences should be analyzed to determine if they are justified.		✓			✓
12	<b>Utilize PetPoint System Functionality To Enhance Efficiency And Effectiveness Of Operations.</b>					
	Management work with their vendor to configure and implement system improvements available within the PetPoint application.	✓			✓	

**\*Management responses stated "Implemented"; the IG will conduct a follow-up audit (FY 2015/16) to confirm the recommendations were implemented as stated by management.**



## Background

Pinellas County Animal Services (Animal Services) was established in 1972. Animal Services first started in downtown Clearwater in the basement of the courthouse, and was later moved to the shelter on 49<sup>th</sup> Street by the County Jail. It is presently centrally located in Largo on Ulmerton Road. Animal Services is the largest open admission shelter for dogs and cats in Pinellas County with the capability of housing upwards of 292 dogs and 600 cats at any given time. Animal Services has the important mission of ensuring the health, safety and welfare of both animal and human residents of Pinellas County.



To accomplish this mission, Animal Services strives to enhance the quality of life in our community through education initiatives designed to:

- Prevent pet overpopulation.
- Provide compassionate enforcement of current laws relating to the treatment of animals.
- Place animals in its care with loving and responsible owners.
- Work towards the elimination of neglect and abuse of domestic animals within its jurisdiction.

Animal Services provides many services including rabies control, animal bite investigation, dangerous dog investigation, pet licensing, kennel permitting, code enforcement, and cruelty investigation. Animal Services continually finds ways to accommodate its residents through initiatives including extended hours of operation, multiple low cost rabies vaccination clinics weekly, and special adoption events throughout the year. Some of the events held in 2014 were:

- June is Adopt a Cat Month - The adoption fee in June for cats is reduced from \$40 to \$25. Rabies vaccinations with the purchase of a license are available on Thursdays from 1 to 4 pm for \$5.



- Independence Day Freedom for Paws – Monday, June 30, 2014 through Wednesday, July 2, 2014, the shelter was open from 9 am to 9 pm to give citizens more time to discover their perfect pet. During this time and through July 15, 2014, the adoption fee was \$5 for all cats including kittens, \$7 for large breed dogs, \$14 for small breed dogs, and \$21 for puppies. The fee included a medical checkup, spaying/neutering, vaccinations, internal and external parasite control, and microchipping. A Pinellas County license was also provided.
- "Yappy Hour" - A special event was held August 22, 2014 and August 23, 2014 where all dogs and cats over the age of four months were free to adopt. The adoption fee for all puppies and kittens under the age of four months was \$25. All dogs and cats that were up for adoption were spayed or neutered, licensed, fully vaccinated, and microchipped, a \$200 value.



- "Yappy Days" - A special event which was held in September 2014 where all adoptable dogs and cats four months and older are free and the adoption fee for puppies and kittens under the age of four months is \$7. The special includes medical checkup, spaying/neutering, vaccinations, internal and external parasite control, heartworm tests, feline leukemia testing, and microchipping.
- "Selfie Saturdays" - The adoptable animals took advantage of the internet trend of taking "selfies" to draw attention to their unique personalities and catch the eye of potential owners online.
- "The 12 Paws of Christmas" - Animal Services celebrated from December 1 to December 12 with adoption fees of \$12 for all animals four months and over. Santa was available for pictures on Saturday, December 6, and Sunday, December 7, 2014 for a \$5 fee with proceeds going to the Animal Welfare Trust Fund.





Animal Services strives to reunite stray animals with their owners and place unclaimed animals using a combination of adoption, fostering, and community partnerships with the:

- Society for the Prevention of Cruelty to Animals (SPCA) Tampa Bay
- Humane Society of Pinellas
- Pet Pal
- Suncoast Animal League
- Over 50 approved rescue groups

Education is a high priority for Animal Services. The organization furthers this commitment by reaching out to our community and through partnerships with St. Petersburg College of Veterinary Technology program and veterinary schools from around the world.

Animal Services has a strong volunteer base that is passionate about the animals in the shelter. In the month of June 2014, 84 volunteers donated over 4,000 hours of service. Volunteers often bring skills from their previous work lives. One volunteer was instrumental in the award of a generous grant for dog food and Milk Bone treats from Big Heart Pet Product Donations. Among the many volunteer opportunities at the shelter, a Teen Program is available. This program is designed to give teens 16 to 18 years of age a sense of pride and ownership through volunteering, and preparing them for a future role within the workforce.

Animal Services' Proposed Fiscal Year 2015 Budget is \$4,915,070 with 52.5 full time equivalent positions. Animal Services has two sources of funding; the General Fund (\$4,469,900) and the Animal Welfare Trust Fund (\$445,170), and consists of five programs:

- Animal Shelter
- Field Enforcement
- Rabies Control and Licensing
- Veterinary Services
- Volunteer Services

The budget summary for the Fiscal Year 2015 Proposed Budget is as follows:

<b>Animal Shelter Budget Summary</b>	
<b>Fund</b>	<b>FY15 Request</b>
General Fund	\$1,752,060
Gifts from Animal Welfare Trust Fund	\$321,170
<b>Program Total</b>	<b>\$2,073,230</b>
<b>FTE (Full Time Equivalent Position)</b>	<b>24.5</b>

<b>Field Enforcement Budget Summary</b>	
<b>Fund</b>	<b>FY15 Request</b>
General Fund	\$1,461,290
Gifts from Animal Welfare Trust Fund	\$1,000
<b>Program Total</b>	<b>\$1,462,290</b>
<b>FTE (Full Time Equivalent Position)</b>	<b>18.0</b>

<b>Rabies Control &amp; Licensing Budget Summary</b>	
<b>Fund</b>	<b>FY15 Request</b>
General Fund	\$427,420
Gifts from Animal Welfare Trust Fund	\$1,000
<b>Program Total</b>	<b>\$428,420</b>
<b>FTE (Full Time Equivalent Position)</b>	<b>3.0</b>

<b>Veterinary Services Budget Summary</b>	
<b>Fund</b>	<b>FY15 Request</b>
General Fund	\$747,310
Gifts from Animal Welfare Trust Fund	\$117,000
<b>Program Total</b>	<b>\$864,310</b>
<b>FTE (Full Time Equivalent Position)</b>	<b>6.0</b>



<b>Volunteer Services Budget Summary</b>	
<b>Fund</b>	<b>FY15 Request</b>
General Fund	\$81,820
Gifts from Animal Welfare Trust Fund	\$5,000
<b>Program Total</b>	<b>\$86,820</b>
<b>FTE (Full Time Equivalent Position)</b>	<b>1.0</b>

<b>Department Budget Summary Expenditures by Fund</b>	
<b>Fund</b>	<b>FY15 Request</b>
General Fund	\$4,469,900
Gifts from Animal Welfare Trust Fund	\$445,170
<b>Total Expenditures</b>	<b>\$4,915,070</b>
<b>Total FTE (Full Time Equivalent Position)</b>	<b>52.5</b>



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# OPPORTUNITIES FOR IMPROVEMENT

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Our audit disclosed certain policies, procedures, and practices that could be improved. Our audit was neither designed nor intended to be a detailed study of every relevant system, procedure, or transaction. Accordingly, the Opportunities for Improvement presented in this report may not be all-inclusive of areas where improvement may be needed.

## ***1. The Segregation Of Duties For Accounting Processes Is Not Adequate.***

During our review of the controls in the accounting area, we determined that the following processes had inadequate segregation of duties:

### **A. Cash Register Transactions Are Not Voided Properly.**

Segregation of duties for voided cash transactions is not adequate. During the process of evaluating the controls over cash receipts, we noted that the three employees who perform the cashier's daily cash balancing and prepare the bank deposit are also approving the voided transactions (receipts) for the cashiers. The three accounting employees have full access to the cash register functions in order to void a transaction.

Cashiers not having the ability to void their own transactions is a good internal control; however, allowing employees who count the cash, reconcile the daily balancing, and prepare the bank deposit to authorize a void is a significant control weakness.

Cash transactions are voided in the cash register system by employees who also perform the daily cash balancing/reconciliation and prepare the bank deposit. Adequate segregation of cash functions has not been established.

The risk exists that an employee could void a transaction in the cash register system from their computer and then could conceal the cash for that transaction when preparing the bank deposit.

Best practices for proper segregation of duties include the individual collecting the cash and depositing the funds should be someone different than the individual responsible for entering that data into the system. The individual collecting the funds should not have update access to the system.

### **B. Purchasing Card Statements Are Not Properly Approved.**

Purchasing card statements are not properly approved. We reviewed Fiscal Year (FY) 2013 purchasing card expenditures for one employee and noted the total amounted to \$109,610.42, a significant amount, which should be reviewed and approved by a supervisor or manager.

Currently, a non-managerial employee in the Administration/Accounting area approves the payment for the purchasing card statements. This employee was previously the Supervisor of the Administration/Accounting area until responsibilities shifted in the department.

Travel, medical, and office supplies are examples of expenditures purchased with the County's purchasing card in the Administration/Accounting area. The monthly purchasing card statement is received in the Administration/Accounting area, reviewed, and reconciled. All backup and purchasing card information is entered into the County's OPUS system.

Management has reorganized departmental functions without adjusting purchasing card approvals accordingly.

Without proper approval of purchasing card statements, the potential for unauthorized expenditures, inadequate funding, improper coding, and incorrect charges can exist.

Proper controls over purchasing card transactions include having a supervisor receive the purchasing card statement with attached receipts and the supporting documentation each month after it has been reconciled, signed, and dated by the cardholder. The supervisor should review the statement expenditures to determine if the expenditures were appropriate. The supervisor should confirm that all transactions adhere to the county's policies and procedures related to purchasing card expenditures.

**C. The Segregation Of Duties For Ordering And Receiving Supplies Is Not Adequate.**

The segregation of duties for ordering and receiving supplies is not adequate. We reviewed several invoices that were paid to Henry Schein Animal Health (formally Butler Animal Health Holding Company LLC) and noted that in three instances the segregation of duties was not proper. In one instance, a single employee had placed an order for supplies in the OPUS system, received those supplies, and then approved the vendor invoice for payment of those supplies. In the other two instances, the same employee ordered supplies and received those supplies, duties which should be segregated.

We also noted that the Animal Services Vet Clinic was requesting supplies without the Director's signature authorizing the request.

Management has reorganized responsibilities within the organization, but policies and procedures have not been developed to properly segregate responsibilities.

A single employee ordering, receiving, and approving invoices has the opportunity to perpetrate and conceal fraud. More risk is potentially involved when the supplies include controlled medical substances.

Segregation of duties is a strong fundamental control in ordering and receiving functions. Duties such as ordering supplies, receiving supplies, making payments, and certifying funding should be assigned to separate individuals to the greatest extent possible.



**We recommend Management implement the following controls to allow for proper segregation of duties:**

- A. 1. Disable cash register system access for the three accounting employees.  
  
2. Assign a Supervisor or Manager the responsibility to authorize voided cash register transactions.
- B. Require that a Supervisor or Manager review and approve all purchasing card statements. Employees should submit a reconciliation, along with the appropriate backup and purchasing card statement to the Supervisor or Manager.
- C. Segregate the responsibilities of staff ordering and receiving supplies, approving and initiating payments in OPUS. The departments requesting and receiving supplies should not have the ability to modify or approve the order placed by the Administrative/Accounting in the OPUS system.

**Management Responses:**

- A. Concur and In Progress. Policies and Procedures in the expanded Finance Manual (as referenced in the Recommendation Response for Opportunity for Improvement No. 8) will preclude Finance staff from generating shelter receipts, and it addresses supervisor responsibility for voids and refunds. With respect to restricting access for Finance staff, the PetPoint system will not allow ideal control, because user rights are not divided up as suggested in this recommendation. However, the department will be utilizing an audit trail that PetPoint provides so that management can monitor whether Finance or another individual completes an unauthorized transaction.
- B. Concur and Implemented. Appropriate supervisory review and approval was an organizational transition issue related to restructuring. This was immediately corrected. OPUS approvals have been set up and implemented to have the supervisor approve P-Card statements and charges.
- C. Concur and Implemented. Updated Standard Operating Procedures (SOP) have been reviewed and approved. OPUS Level 1 and 2 approvals have been implemented and are in place. All staff must have immediate supervisory review and consent for all purchases.

## **2. Controls Over Manual Receipts Are Not Adequate.**

- A. **There Is No Control To Ensure Cash Donations And Fees Collected Offsite Are Recorded By The Cashiers.**

There is no control to ensure that cash donations and fees collected offsite are recorded by the cashiers. Animal Control Officers (ACO), and sometimes other designated employees, issue



manual receipts when collecting cash donations and fees during offsite patrolling or when delivering animals to pet stores. The manual receipt books have three copies per receipt. The white copy is given to the customer, the yellow copy is given to the cashier, and the pink copy remains in the employee's receipt book.

The typical process for collecting cash donations and fees requires that the ACOs bring in the cashier's yellow copy along with the cash to the cashiers at the Animal Services counter. The cashier manually enters the donation in the system as a sale. The system, consequently, generates a receipt number which the cashier records on the yellow copy. At the end of the day, Accounting uses the processed copy for balancing the cash registers. The process does not require the ACOs to wait for the cashier's initial or the system-generated receipt number; consequently the exchange between the ACOs and the cashiers is not memorialized on the ACOs end.

There is always a high risk of theft when handling cash. The cashier could potentially pocket the cash, not enter the manual receipt number, and therefore, the sales transaction would never be recorded. The theft may not be discovered until the completed receipt book is returned to the Accounting staff, if it is even returned.

Strong controls are essential to safeguard cash receipts. These controls help ensure that cash is accounted for upon receipt and that procedures are in place at each step of the process to ensure the cash is properly secured.

#### **B. The Process To Monitor Manual Cash Receipt Books Issued To Employees Needs Improvement.**

The process to monitor manual cash receipt books issued to employees needs improvement. Manual receipt books are issued to employees and sometimes volunteers to provide receipts to customers when collecting cash donations and fees offsite (field). Also, cashiers sometimes use manual receipts when the cashiering (software) system is not operating at Animal Services.

The current process for monitoring cash receipt books entails the accounting staff documenting the issued books onto an excel spreadsheet titled, "Verified Receipt Log Sheet," with subheadings for issuance to either the Animal Control Officer, Volunteers, or front office staff.

We obtained a current listing of all manual receipt books issued. We noted on the log sheet 23 outstanding manual receipt books. Eleven of those books, almost 50% of the 23, were issued more than a year ago. The current process does not call for a periodic review by the Supervisor to account for outstanding manual receipt books.

Also noted on the log sheet were two instances where the manual receipt books could not be accounted for. The current process, which is not documented in writing per policy, is that the employee must provide a memo explaining why the manual receipt book or manual receipts



cannot be accounted for. This is a process which occurs when the employee turns in the manual receipt book and/or is requesting a new book.

The current process for monitoring issued manual receipt books does not include a periodic review of outstanding receipts by a Supervisor. There are no standardized written policies and procedures to monitor manual receipt books issued.

Unreconciled manual receipt books provide no documentation that all manual receipts have been properly accounted for. Potentially, cash may be collected offsite and not properly recorded as a cash donation or fee collected.

Good Internal control practices would require that the issuance of manual receipt books be monitored and controlled on a regular basis.

**We recommend** Management improve the current process by implementing the following controls:

- A. Implement a procedure which requires the Animal Control Officers (ACO) and/or other designated employees to obtain the cashier's initials and system generated receipt number to enter on the pink receipt copy.
- B. 1. Implement standardized written policies and procedures for monitoring manual receipt books issued. All employees should be trained on these policies and procedures.  
2. Require all Supervisors to periodically review employee receipt books. The requirement for the review and the frequency should be documented in the written policies and procedures implemented.

**Management Responses:**

- A. In Progress. Updated procedure is currently in the review and approval process.

Planned. Animal Control Officers (ACOs) will be shifting to entering all receipts directly into the PetPoint system. The rare cases of using manual receipts will be monitored through a periodic review already in place through policies and procedures referenced in Management's Response 2.B below.

- B. Concur and In Progress. Updated procedure is currently in the review and approval process.

### ***3. Some Facility And Maintenance Issues Exist At Animal Services.***

We toured the administration, kennel, and ground areas of the Animal Services facility several times a week, for the several months we worked on-site. We noted that the Animal Services



facility is well maintained with standard protocols for keeping the facility and kennel areas clean and sterilized. However, some facility and maintenance issues in the kennel and cat shelters do exist as noted below:

**A. Security Controls Are Not Adequate In The Adoption Kennel Area.**

Security in the adoption kennel area is not adequate. The main entrance door to the Adoption Kennel is located in the customer service area. Customers are allowed to enter the adoption kennel freely to browse the animals available for adoption. However, there are two other unlocked doors in the Adoption Kennel that lead to a rear hallway of the facility. The hallway leads to the Veterinarian/clinic unlocked areas where animals are examined, surgery is performed, and animals recover from surgery. These areas are considered restricted.



The hallway also leads to the office areas, supply rooms, three other kennels, and the cat shelter. One of the three kennels is the Quarantine Kennel where bite dogs, considered dangerous, are held for 10 days to determine if rabies is present. These areas are also considered restricted. Through the unlocked doors in the Adoption Kennel, the public could potentially access all restricted areas, accidentally or otherwise.

The other doors in the main customer service area, which lead to the office areas, supply rooms, kennels, and cat shelter, require electronic access with approved county identification name badges to prohibit customers from entering restricted areas. The ability to enter restricted areas through a separate point of entry, such as the Adoption Kennel, defeats the purpose of secured point of entries in the Customer Service area located in the main lobby.

Management stated that surveillance cameras and lack of incidents in the past demonstrates sufficient security. Management also stated that keeping the doors unlocked makes it easier for the Volunteers to enter and leave when tending to the animals in the Adoption Kennel.

Inadequate security presents potential risks such as theft and/or safety hazards to customers and employees, which could in turn lead to potential legal issues.



Security controls (physical controls) are safeguards or countermeasures to avoid, counteract, or minimize security risks related to personal property, or any county property. They are preventative in nature.

**B. Temperatures In Kennels And Cat Shelter Exceed Recommended Best Practices.**

Temperatures in the dog kennels and cat shelter exceed best practice recommendations by the Association of Shelter Veterinarians. We monitored the temperatures in the stray/overflow and quarantine kennels and the cat shelter on 10 random days. The temperature readings were taken from the Animal Services temperature and humidity monitor located in each kennel and the cat shelter. We did not monitor the adoption kennel or cat adoption room since these areas are climate controlled.



Management stated that, a new ventilation (blower) system, costing approximately \$300,000, was installed over a year ago to prevent disease in the kennels. A good ventilation system is necessary; however, the kennel areas do not cool down to a comfortable level for the animals or employees cleaning and/or tending to the animals in the non-climate controlled areas. We observed that the kennel areas are always populated with various sizes of dogs with various types of coats of hair, which could be adversely impacted by the temperatures of the non-climate controlled areas.

The tables below reflect the recorded temperatures and humidity percentage readings for each day of our sample. The readings were taken in early to mid-afternoon for all areas. The days were randomly selected and were not concurrent.

**KENNEL #1**

<i>Day</i>	<i>Temperature</i>	<i>Humidity%</i>	<i>Heat Index*</i>
1	89.3	59	98
2	88.7	58	96
3	90.0	65	103
4	87.3	66	96
5	87.5	68	98
6	89.6	58	98
7	88.2	65	98
8	87.7	70	99
9	89.1	57	96
10	89.0	58	96
<b>Averages**</b>	88.6	62	98

**KENNEL #2**

<i>Day</i>	<i>Temperature</i>	<i>Humidity%</i>	<i>Heat Index*</i>
1	87.7	61	95
2	87.7	59	94
3	88.9	65	100
4	87.3	66	96
5	87.1	69	97
6	89.3	60	98
7	87.5	68	98
8	86.8	69	97
9	87.7	62	95
10	87.2	64	95
<b>Averages**</b>	87.7	64	97



**KENNEL #3**

<i>Day</i>	<i>Temperature</i>	<i>Humidity%</i>	<i>Heat Index*</i>
1	86.6	68	96
2	86.2	68	95
3	87.5	76	102
4	85.9	73	96
5	86.0	74	97
6	87.7	67	98
7	87.5	73	100
8	86.6	73	98
9	86.8	68	96
10	86.6	70	97
<b>Averages**</b>	86.7	71	98

**CAT SHELTER**

<i>Day</i>	<i>Temperature</i>	<i>Humidity%</i>	<i>Heat Index*</i>
1	87.5	62	95
2	87.5	59	94
3	88.6	65	99
4	87.5	63	95
5	87.7	63	96
6	90.0	55	97
7	88.7	59	96
8	86.6	69	96
9	89.3	56	96
10	88.5	58	95
<b>Averages**</b>	88.2	61	96

\* The Heat Index is the index that combines the air temperature and relative humidity, also known as the "felt air temperature."

\*\*The Averages are the summation of each table column divided by the number of days (10 days).

The temperatures recorded above in our sample are all above recommended best practice levels. On most days in our sample, the humidity percentages fell in the acceptable range of best practices. However, the heat index, "felt air temperature," was significantly higher than the acceptable best practice temperature.

The Association of Shelter Veterinarians, Guidelines for Standards of Care in Animal Shelters, states the following in regard to facility design and environment:

*"For dogs and cats, the AVMA (American Veterinary Medical Association) recommends the ambient temperature should be kept above 60°F (15.5°C), and below 80°F (26.6°C), and the relative humidity should range from 30 to 70%."*

Animal Services does not have climate controlled conditions in the stray, overflow, quarantine kennels, or in the cat shelter areas.

Excessive heat can contribute to uncomfortable environments (i.e. excessive panting for dogs, etc.) and potentially impose health risks to animals that become overheated. The breed of an animal, body condition, medical condition, hair coat, facial conformation, and age differences will impact the health risks associated with elevated heat temperatures.

### **C. The Kennel Areas Have Maintenance Issues.**

Some maintenance issues exist in the kennel areas at Animal Services, as follows:

- 1. Dusty and non-operating ceiling fans.** During our recording of the temperature and humidity readings (see section B above), we observed several ceiling fans in all kennel areas, including the cat shelter, which were not operating and were very dusty. The blower system, costing approximately \$300,000, was designed to prevent disease. Per management, the fans were installed as a temporary solution while the blower system was being installed. However, the fans were not removed and only approximately half are operating in each kennel.





- 2. Leaky faucets.** In one kennel, we observed two buckets under leaking faucets in the back area of the kennel. This was observed on several occasions.

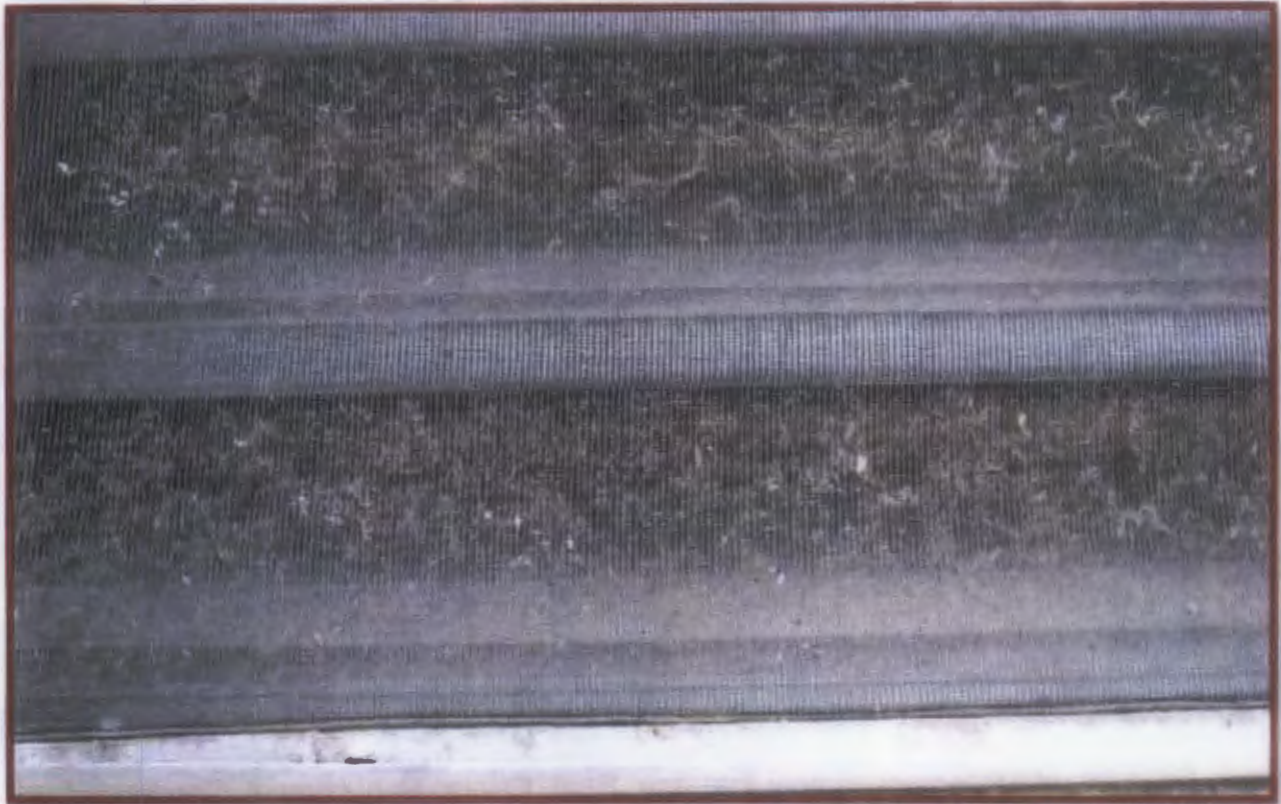


3. **Broken tiles.** In all kennels, we observed broken tiles under almost all dog pens. The tile supports the bottom of the pens, and in some areas, the tile was very worn, cracked, and chipped. In some of the canine pens, the concrete was deteriorating and exposing the rebar.





**4. Dusty window screens, inside and outside.**



- 5. Torn window screens.** We observed in one kennel that window screens were torn large enough to allow bugs and mosquitoes to enter the area.



Animal Services Management stated that the Real Estate Management Department is responsible for oversight for maintenance issues at their facility. Per management, some issues, such as the broken ceiling fans, have been discussed with the Real Estate Management staff, but servicing was denied. Real Estate Management staff stated to Animal Services Management that the fans were installed as a temporary measure while the new blower system was being installed.

Most of the maintenance issues we observed affect the quality of the air circulating from the blower system designed to prevent disease. Dusty and non-operating ceiling fans, and torn screens, can potentially contribute to disease and health decline of the animals, which negates the prevention of disease designed by the blower system that has been installed.

Best practices/guidelines for standards of care in animal shelters state that, "shelters must provide an environment that is conducive to maintaining animal health." Heating, ventilation, air quality, and surfaces and drainage, are elements defined in environmental maintenance.

**D. Inventory Of Needles And Syringes Should Be Kept In A Locked Location.**

Needles and syringes are used throughout the facility and they are stored in the unlocked Central File room in plain view. Needles and syringes are not inventoried, and as a result, missing stock could easily go unnoticed. Although there are cameras in the hallway, there are none in the Central File room itself.





The supply of needles and syringes is kept in Room 128 - Central Files, which we found open during the day. The practice of openly storing needles and syringes leads to the risk of theft and/or use for unintended purposes. In addition, a person under the age of 18, such as a summer program volunteer, should not have access to the syringes and/or needles according to Florida Statute 893.147(3)(b). With the current storage arrangements, Animal Services run the risk of violating said Statute.

Florida Statute 893.147(3)(b) states the following:

*"It is unlawful for any person to sell or otherwise deliver hypodermic syringes, needles, or other objects which may be used, are intended for use, or are designed for use in parenterally injecting substances into the human body to any person under 18 years of age, except that hypodermic syringes, needles, or other such objects may be lawfully dispensed to a person under 18 years of age by a licensed practitioner, parent, or legal guardian or by a pharmacist pursuant to a valid prescription for same."*

**E. The Written Emergency Preparedness Plan Is Not Complete.**

The written Emergency Preparedness Plan is not complete for the Animal Services facility. Animal Services is a unique type of business, which has to consider the welfare and safety of its animals in addition to employees, volunteers, customers, and others at its location, including employees in the field, such as Animal Control Officers.

Currently, Animal Services has standard operating procedures, which include preparing the facility for a hurricane. However, no guidelines outline the necessary steps to ensure that staff is well prepared to undertake all types of emergencies that could affect the facility. Hurricane preparedness is only one type of emergency that could arise. For example, consideration should be given to non-evacuation and mandatory evacuations for hurricanes. In addition, fires, flooding, tornadoes, contaminations, and electric outages are other types of emergencies that should be addressed.

Management has not developed a complete written formal plan to prepare the facility for all potential types of emergencies.

Lack of a formal written Emergency Preparedness Plan could potentially present legal or insurance claim issues, and unnecessary safety risks with regards to the staff, volunteers, customers, and animals. In addition, facility assets, resources, and medical equipment may not be adequately safeguarded from potential damage.

The FEMA/DHS Ready Gov Campaign suggests:

*"A preparedness policy that is consistent with the mission and vision of the business should be written and disseminated by management. The policy should define roles and responsibilities. It should authorize selected employees to develop the program and keep it current. The policy should also define the goals and objectives of the program. Typical goals of the preparedness program include:*

- *Protect the safety of employees, visitors, contractors and others at risk from hazards at the facility. Plan for persons with disabilities and functional needs.*
- *Maintain customer service by minimizing interruptions or disruptions of business operations.*
- *Protect facilities, physical assets and electronic information.*
- *Prevent environmental contamination.*
- *Protect the organization's brand, image and reputation."*

**F. There Are No Policies And Procedures Related To The Utilization Of Security Cameras.**

There are no formal written policies and procedures related to the usage and monitoring of the security cameras installed in the Animal Services facility. Per management, the first security cameras were installed approximately two years ago to monitor the welfare of the animals, employee activities, and building security.

All management staff has access to the security cameras whether they are onsite or offsite. A Pinellas County Animal Services Program Manager has oversight of the security camera system and equipment.



Management has not developed and implemented written policies and procedures for management planning, control, and evaluation of activities captured by the cameras.

Without formal written policies and procedures, there is the risk that the security cameras will not be used in an efficient and effective manner, and consequently, defeating the purpose of acquiring them.

Written policies and procedures serve as a basis for management planning, control, and evaluation of activities. They communicate management's expectations of timeliness, responsibility, authority, and restrictions.

**We recommend Management:**

- A. Install and activate electronic entry to both doors located in the Adoption Kennel for Animal Services and Volunteers. Access cards issued to Volunteers should be monitored by management.
- B. Evaluate and implement alternatives to establish and maintain the recommended best practice temperature range.
- C. Consult Real Estate Management department staff to address the maintenance issues in the kennel areas.
- D. Move the supply of needles and syringes to a locked room or use a cabinet/cage with a lock in the Central File room. In either case, access should be limited.
- E. Prepare a formal written emergency preparedness plan to include, at a minimum, the following:
  - 1. Assessment of risks for the facility.
  - 2. Development of an emergency response plan for each potential risk identified.
- F. Develop and implement formal written policies and procedures for the use of the security camera system to include the following:
  - 1. Placement of Cameras
  - 2. Access and Monitoring Roles
  - 3. Appropriate Use and Confidentiality
  - 4. Use of Cameras for Investigations
  - 5. Storage and Retention of Recordings

**Management Responses:**

- A. Concur and Implemented. Pinellas County Animal Services worked with Real Estate Management to complete this item in a way that was in compliance with building codes



and balanced the overall protection with risk. Minor adjustments to placement of electronic locks were made, but equivalent security level has been achieved.

- B. In Progress. Real Estate Management and Purchasing have approved the purchase and installment of new fans to partially address temperature issues as an interim solution. Implementation should be completed in Fiscal Year 2014/2015.

Planned. The Architecture Plan from the engaged architect addresses options for achieving recommendations. Funding options and timelines are being evaluated by Animal Services, Real Estate Management, and County Administration.

- C. Concur, Some Implemented, and Remainder Planned.

Implemented. Non-working fans are being removed as they become non-functional, leaking faucets repaired, dusty screens cleaned, and torn screens replaced.

Planned. Broken tiles are evaluated in the Architectural Plan and solutions are being reviewed since a structural correction must be made.

- D. Concur and Implemented. All inventories, except what is immediately needed by the hospital, have been moved to the locked central storage location, and are accessible only by management staff. Staff needing appropriate access can gain entry to the storage room through management staff.
- E. Partially Concur and In Progress. Pinellas County Animal Services has been working with Emergency Management and Real Estate Management to assess the facility and create appropriate contingency plans. An Initial Plan has been developed to address hurricanes and fires. Additional work is planned in conjunction with Emergency Management to complete contingency plans and also to create agreements with community partners.
- F. Partially Concur and In Progress. Pinellas County Animal Services has been working with Legal and Risk to address issues in the most appropriate way possible. Records Management has advised that the current practice of re-using video storage for new video every 2 weeks complies with records' retention laws.

#### **4. Standard Operating Procedures For Canine Evaluations Are Not Complete.**

- A. There Are No guidelines For Proper Documentation Of The Canine Evaluation Form.

The standard operating procedures (SOP) for incoming dog exams do not include guidelines for filling out the "Canine Evaluation Form." The Canine Evaluation Form was implemented by management in early 2014. The form has various criteria used for the examination process to determine the disposition of the canine (adoption or euthanization), which is being adhered to

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by staff. A recommendation or non-recommendation is made by more than one staff member based on the pass or fail of the criteria mentioned on the form.

We reviewed a judgmental sample of ten Canine Evaluation Forms processed during the month of May, 2014. Our sample included a selection of different breeds from the Animal Services Disposition report.

During our review of the sample, we noted that the forms were not consistently prepared, and only one signature/initial was evident on the forms, although more than one person was making each decision. Also, we could not determine if the Veterinarian or other team member had been involved in any of the exams or if there was any disagreement between the Senior Care Assistant (SCA) and Veterinary Technician regarding the disposition or the borderline behavior considerations. There were no notations or signatures on the forms sampled.

Our sample indicated the need for written guidelines for proper documentation of the Canine Evaluation Form to ensure that Management's SOPs regarding canine exams for adoptions are adhered to.

Our observation of one canine exam screening indicated that employees were confused as to how to properly document the form, and if the most recent version of the form was the one being used.

Management has not updated the SOP to require dual signatures and notations of any borderline behavior issues, which require the Veterinarian or another team member to determine the final behavior evaluation.

Without written guidelines, documentation on the Canine Evaluation Form may be inconsistent and inaccurate. Also, there is no evidence that the current written SOPs are being followed in regards to having two employees, the SCA, and the Veterinarian Technician participate in the decision for final disposition, and whether or not there was disagreement or borderline behavior considerations.

Pinellas County Animal Services, Animal Services Hospital Standard Operating Procedures (SOP) 0-7, states the following:

*6. a) Senior ACA responsibilities include;*

- "ii. Assist in examination processing and final disposition determination assessment,*
- v. Complete a Canine Evaluation Form on each dog."*

*b) The Veterinary Technician responsibilities include;*

- "ii. Assisting the Senior ACA in determining fitness for examination process,*
- iii. Performing the physical and behavior exam,*



*v. Determining final disposition assessment with the Sr. ACA as a result of the exam."*

Section B(2) of the SOP states the following in regards to borderline behavior considerations:

*"If a determination cannot be made concerning borderline behavior considerations of a specific dog, refer first to the veterinarian and second to another team member for a final behavioral evaluation..."*

**B. There Are No Written Procedures To Re-Evaluate Canines.**

There are no written procedures to re-evaluate canines. The Pinellas County Animal Services Hospital Standard Operating Procedures 0-7 (SOP) states that the purpose of the SOP is:

*"To provide basic guidelines for behavioral examination and preliminary medical examination of cats and dogs ready to be processed for adoptions."*

The Canine Evaluation Form is also used to evaluate the dogs during the adoption screening process. However, there are no written policies and procedures for animals that are re-evaluated for adoption after being held in the adoption kennel for a longer period of time.

In addition, sometimes animals are found dead in their pens and an exam is performed by the Veterinarian to possibly determine the cause of death. Although the number of animals found dead in pen (DIP) is minimal in relation to overall disposition types, procedures and policies should be written to guide staff and standardize the process.

Management has current standard operating procedures regarding examinations for adoption. However, there are no written policies and procedures for the processes related to re-examinations for adoption and animals found dead in pens.

Without written policies and procedures for exams to re-evaluate animals for adoption and animals found dead in pens, control and evaluation of these activities are limited.

Written policies and procedures serve as a basis for management planning, control, and evaluation of activities. They communicate management's expectations of timeliness, responsibility, authority, and restrictions.

**We recommend Management:**

- A. Update the Standard Operating Procedures for dog exams to include guidelines for completing the Canine Evaluation Form. The guidelines should require:
  - 1. Dual signatures as evidence that procedures are adhered to.
  - 2. Documentation of borderline behavior issues.
  - 3. Signature of the authorized employee making the final behavior evaluation.



- B. Develop and implement written policies and procedures for the processes used to re-examine animals for adoptions, and exams for animals found dead in pens. The Canine Evaluation Form used for adoption screening should also be used when re-examining dogs.

**Management Responses:**

- A. Concur, Implemented, and In Progress.

Implemented. Animal Services has updated and implemented policies and procedures that address dual signatures, procedures for borderline behaviors, and signature of staff that make decisions.

In Progress. Animal Services is updating the Standard Operating Procedures (SOP) to be consistent with procedures needed for implementation of PetPoint.

- B. Concur, Implemented, and In Progress.

Implemented. Animal Services updated and implemented policies and procedures for re-examination of animals in adoptions, and examination of animals found dead in pens.

In Progress. Animal Services is updating the SOP to be consistent with the procedures needed for implementation of PetPoint.

**5. *There Are No Written Policies And Procedures For After-Hours Emergency Care.***

No documented policies and procedures have been developed for emergency after-hours care at Animal Services. Per staff at Animal Services, the current verbal policy entails taking the animal to an emergency hospital should a serious emergency arise. If the animal is suffering, it is euthanized by the Animal Control Officer who is authorized to perform the procedure.

The Veterinarian is consulted after-hours in most cases when emergencies arise, and if a cruelty/abuse report is required, the Veterinarian will come in to Animal Services to complete the investigation. The staff at Animal Services has an emergency kit for non-serious types of emergencies.

Management has not developed formal written policies and procedures for after-hour emergency care.

Without documented policies and procedures, responsibilities, actions, and the necessary resources, dealing with an emergency may be unclear to all staff and/or volunteers. Animals may not receive prompt attention or emergency care, which could result in worsening conditions or death.

responsibility, authority, and restrictions. Emergency policies and procedures identify the responsibilities, actions, and resources necessary to deal with an animal's emergency.

**We recommend** Management develop formal written policies and procedures for after-hours emergency care.

**Management Response:**

Concur and Implemented. The Standard Operating Procedures (SOP) have been reviewed, approved, and implemented.

## ***6. There Is No Formal Quality Assurance Program Subsequent To The Disposition Of Animals.***

There is no formal Quality Assurance Program performed by a dedicated employee subsequent to the disposition of the animals. For impounded animals, the disposition is the last activity performed and recorded. During our review of the Animal Services flowchart for processes and discussions with staff, we noted there are several processes beginning at the impound stage through the final disposition of the animal, which are performed by several different staff.

The processes performed during an animal's impound are audited by staff after each activity performed. Impound Cards are used to document most of the activities related to these processes. The software system is used for transaction processing and to update required specific fields with the information that is documented on the Impound Cards.

Staff involved with the processes during the animals impound include:

- Volunteers
- Customer Service
- Animal Control Assistants
- Animal Control Officers
- Veterinarian
- Veterinarian Technicians
- Administration

The various types of activities that occur during an animal's impound include:

- Surrenders
- Quarantine
- Vaccinations
- Licenses
- Microchips
- Spay/Neutering
- Medical treatment



- Field Services/Dispatch calls (strays, bite animals, neglect and abuse animals)
- Partner/Animal Rescue Adoptions
- Pet Store deliveries

Reclaims, adoptions, and euthanasia/cremation are examples of dispositions. No dedicated staff is currently reviewing the activities that were performed after the animal's final disposition to assure compliance with policies and procedures, Florida Statutes, and other applicable laws.

Management has not developed a Quality Assurance Program. Management stated that budget restraints have prevented them from employing a dedicated employee/staff to perform quality assurance responsibilities.

The lack of a Quality Assurance Program can potentially result in non-compliance with policies and procedures, Florida Statutes, and other laws. In addition, the quality level of customer service may be affected.

Quality Assurance (QA) is prevention of quality problems through planned and systematic activities including documentation. A Quality Assurance Program is a complete system to assure the quality of services and/or products by evaluating performance and/or a service against a standard or specified requirement.

**We recommend** Management develop and implement a written Quality Assurance Program to review the activities of animals impounded through disposition.

**Management Responses:**

Concur, Implemented, and Planned.

Implemented. Animal Services continues to execute various checks and audits of data quality and animal disposition as well as compliance with policies and procedures. With the implementation of PetPoint, several automated checks are already in place, which includes daily emails that allow staff to review animal status and check data quality.

Planned. In addition, Animal Services has plans to develop a formal quality improvement program that integrates existing and new aspects of data quality, procedure compliance, measurable outcomes and improvements, and implementing goals towards best practices and excellence.



## **7. Controls Over Pet License Tags Are Not Adequate.**

Internal controls over license tags are not adequate. During our review and testing of the processes used to account for license tags, we noted the following control weaknesses.

### **A. There Were 746 License Tags Unaccounted For.**

There were 746, or 1.2%, of unaccounted license tags of the 61,555 license tags issued from 2009 through 2013. The Animal Services Clinic (Clinic 999) accounting report, "Tags issued, Not Sold," identified 746 tag numbers beginning January 1, 2009 through December 31, 2013 that were not accounted for. The report indicates a break in sequence of the license numbers issued by the Accounting staff to the Animal Services Clinic. The tags unaccounted for are not material in relation to the overall number of tags issued; however, the same report is printed annually for Vet Clinic partners, who are billed \$20 for each unaccounted license tag issued from Animal Services.

The cashiers in the Customer Service area each maintain a box of animal tags with a range of numbers. The tags are issued in numerical order to the customers and the license information is entered into the system and the certificate is printed.

A verbal policy in the Customer Service area includes marking "void" on the paper licenses for voided transactions and filing them in sequential order with licenses issued.

The Animal Services (Clinic 999) "Tags Issued, Not Sold" report has not been reconciled on a regular basis to account for missing animal licenses/ tags. There are no written procedures to cover the process.

Unreconciled license tags/numbers provide no documentation that all license tags have been properly accounted for.

Good internal control practices suggest that if an agency issues permits or licenses, they should be pre-numbered. If pre-numbered permits, licenses, or receipts are used, they should be tracked to ensure they are properly accounted for.

### **B. Unissued License Tags Are Not Properly Secured.**

Animal Services maintains a stock of license tags to be issued for new adoptions, existing pet owners, and those to be issued to Vet Partner Clinics.

Employees who maintain and issue the license tags stated that the tags are kept in an unlocked file cabinet. However, during afterhours, the office door remains locked. Most employees are aware of the location of these tags since they are retrieved when issued to other employees, including the Animal Control Officers.



The employees who issue license tags are not always available during working hours in the area where the tags are located. In their absence, license tags are no longer properly safeguarded since the cabinet is not locked. In addition, even when these employees are present and working in the area, often times they may be distracted with phone calls, assisting other employees, or performing accounting related responsibilities. These distractions diminish the safeguard of the tags.

Management does not determine if license tags are adequately secured during operating hours.

Not properly securing license tags can potentially lead to theft, misuse, unauthorized issuance, and lack of accountability.

Safeguards are a necessary feature of an organization's internal control system to protect inventory, cash, and supplies. License tags are supplies critical for the operations at Animal Services. In Pinellas County, it is required by law that pet owners obtain a license for their cats and dogs.

**C. There Are No Written Policies And Procedures For Vet Partner License Issuances.**

Vet Partners are issued a series of license tags in sequential order from the Animal Services' Accounting Department. The license tags are then issued to customers by these Vet Clinics after rabies vaccinations have been administered. The fees collected for the licenses are deposited into a lockbox by the Vet Clinics and the paperwork is delivered via the Bank Courier to Animal Services. The Administrative and Accounting areas have recently been reorganized. The staff currently rotates responsibilities as a means to cross-train on the various functions required by management. Listed below are the key functions related to processing the license tags issued to Vet Partner Clinics:

- Issuance of license tags to Vet Partner Clinics
- Daily reconciliation of lockbox deposits
- Posting of fees deposited
- Reconciliation of license information (paperwork) received from Courier
- Vet Partner Clinic billings for unused license tags
- Incentive distributions to Vet Partner Clinics

These key functions are required to ensure that license tags issued to Vet Partner Clinics have been properly accounted for.

The process to issue license tags to Vet Clinic Partners has not been formalized yet into written policies and procedures by management.

Without written policies and procedures, unauthorized deviations could occur that could cause processing errors and unaccountability of tags and their fees.

Written policies and procedures provide guidance that is necessary to properly and consistently carry out departmental activities at a required level of quality. The establishment of the policies and procedures provides the opportunity for management to ensure that adequate internal controls have been established. The development of policies and procedures also supports the cross-training and backup for key staff functions.

It is management's responsibility to establish written internal procedures covering key department processes. The procedures should be in sufficient detail to provide standard performance criteria and reduce the risk of misunderstanding and/or unauthorized deviations that could cause processing errors.

**We recommend Management:**

- A. 1. Implement a written procedure requiring a reconciliation of the Animal Services "Tags Issued, Not Sold" report on a regular basis. The reconciliation should be completed by someone independent of the cashier function.
- 2. File voided tags/licenses in a separate file.
- B. Implement a written procedure requiring license tags be kept in a locked cabinet or other designated secure location.
- C. Develop written policies and procedures for the processes related to the issuance of license tags. The policies and procedures could potentially be written into an Accounting and/or Administration manual.

**Management Responses:**

- A. Concur and In Progress. Written procedures based on PetPoint functions is in process along with the expanded Finance Manual and will require someone independent of the cashier function to reconcile license tags.
- B. Implemented and In Progress.

Implemented. Tags are kept in a locked file cabinet in the Finance area and in the locked storage room.

In Progress. Inventory and security procedures for license tags are included in the expanded Finance Manual as discussed in the Recommendation Response for Opportunity for Improvement No. 8.

- C. Concur and In Progress. Written policies and procedures to be included in the expanded Finance Manual that is addressed in the Recommendation Response for Opportunity for Improvement No. 8.



## **8. *There Is No Administrative Manual Which Documents All Accounting Related Processes.***

There is no Administrative Manual, which provides written documentation of all accounting related processes. The administrative staff at Animal Services has recently reorganized and acquired new responsibilities. The staff is currently cross-training on all accounting related processes. Staff could not provide us with current policies and procedures for most processes. However, a binder with written policies and procedures for cashier balancing had recently been prepared by one employee in the accounting area. These procedures relate to cashier balancing, which is performed in the morning on the next business day.

On one occasion, an employee assigned to the cashier closing process after Animal Services had closed for business had no written or verbal instruction on how to perform the process. Our review of other written procedures provided to us by management indicated that the documented processes were outdated. One example was the procedures for "Mailed in Requests for Licenses." These procedures provide detail for the cashier to receive and open the checks and rabies certificates for license renewals received in the mail. The checks and renewals would then be entered into the system by the cashier. Checks and rabies certificates for license renewals are now received by the accounting staff. The accounting staff member documents the receipt of the check on the check log and initials. The checks and certificates are then forwarded to the cashier in the customer service area for processing.

Animal Services is in the process of reorganizing several activities. Administrative staff assigned to perform accounting related functions has acquired new responsibilities, which have not been formally documented in writing nor approved by management.

Without an Administrative Manual to guide staff on how to perform the accounting related functions, activities may not be recorded accurately and consistently. In addition, there are no written policies and procedures for newly hired employees to refer to or for employees' cross-training on new accounting related functions.

An Administrative/Accounting Manual includes policies and procedures and examples of documents to ensure that activities are recorded accurately and consistently in the organization. The resulting accounting policy and procedure documentation serves as a training tool for administrative/accounting staff.

**We recommend** Management develop an Administrative Manual for accounting functions, which includes:

- A. Written policies and procedures for all processes, to include compatibility with the new software system.
- B. Examples of forms and documents used in the processes.
- C. Segregation of duties.



D. Supervisor responsibilities.

**Management Response:**

Partially Concur and In Progress. All accounting duties had been inventoried in May 2014 and segregation of duties' assignments were reviewed with staff. Prior manuals addressed the majority of finance duties. Animal Services has drafted a new expanded Finance Manual that completely addresses all duties, including reference to the Finance Division policies and procedures. It is currently being reviewed and revised in preparation for formal approval.

## ***9. Increased Financial Transparency Is Needed For The Animal Welfare Trust Fund.***

The County's website for Animal Services gives the public general information regarding the Animal Welfare Trust Fund. However, there is minimal financial transparency to the public to account for the resources available and the expenditures incurred from the fund.

Resolution No. 89-244, Commission Agenda #12, June 20, 1989, was adopted to provide for receipts from gifts, grants, and awards of money from either public or private donors to be placed in trust for the exclusive use and benefit of animal welfare. The resolution was silent in regards to the specific uses of funds, except for the adoption of Resolution No. 00-243 dated November 21, 2000 for the Family Reunion and Community Celebration events not to exceed \$3,000 annually, as adjusted annually by 5%.

Per management, there is no reserve required for the fund and no formal plan has been developed for future uses of the fund. As of August 4, 2014, there were total year to date (YTD) expenditures of \$59,137. However, the budget for FY 2014 showed \$448,410 of planned expenditures. The Reunion and Community Celebration events were halted; however, management did indicate that the funds would be used again for the events in the future.

Per departmental management, the Animal Welfare Trust Fund has typically been used for the following types of items:

- Salary for employee who transports cats to pet stores
- Toys for animals
- Special dietary food
- Grooming supplies for Volunteer Groomer
- Medical supplies

However, there is no recap shown of how much of the fund was allocated and expensed for the specific items stated above, or for funds used for items that are not typically purchased.



Management also stated that a request for a dedicated marketing position for the trust fund was submitted for approval. The position is estimated to cost \$70,000 annually and would be paid from the trust fund.

The Animal Services website does not provide a budget and financial expenditure synopsis for the Animal Welfare Trust Fund. Nor does it provide any links to such information.

This Fund is a Special Revenue Fund and is reported in the County's Comprehensive Annual Financial Reports. Furthermore, there are appropriate controls in place, such as Clerk's Finance disburses the funds, maintains the records, has custody of the money, and issues fund checks.

Limited transparency of the Animal Welfare Trust Fund monies to the public could potentially result in fewer donations due to uncertainty or skepticism on the part of donors.

Transparency is characterized by visibility or accessibility of information especially concerning business practices. Financial transparency means making information as accessible as possible.

**We recommend** Management provide transparency to the public on resources and expenditures of the fund, and projected short and long term plans for uses of the fund.

**Management Responses:**

Partially Concur, Implemented, and Planned.

Implemented. Animal Services currently provides transparency to the Animal Welfare Fund through a descriptive brochure in our public relations packet. The budgeting and expenses are available to the public on the Clerk's Spending in the Sunshine site. Furthermore, the Animal Welfare Fund accounting information is maintained separately from county general funds in a special revenue fund. It is reviewed every year by Animal Services, County Administration, and the Office of Management and Budget (OMB) as part of the budget review and planning process.

Planned. Animal Services plans to increase visibility by updating the public information flyer on the Animal Welfare Fund to include instructions for retrieving information on the Clerk's website, and also will publish an Annual Report on the fund at the end of each Fiscal Year.

## ***10. There Are No Written Policies And Procedures For Animal Control Officers' Functions.***

There are no documented policies and procedures for Animal Control Officers' (ACO) functions. The types of field services performed by the ACOs include the following:

- Calls for nuisance, bite, neglected (abused), and stray animals

- Site inspections at breeder's properties and pet shops, rescue groups, etc.

Complaints are received from citizens and police officers. The calls are taken by three ACOs who are dedicated to receiving the calls at Animal Services and entering the information electronically into the dispatch feature in the Animal Services' software.

The ACOs in the field can track their area assignments from the computer (laptop) installed in their trucks when out in the field. Per management, the typical turn around for responding to calls is one to two days. Management stated that Animal Services has become much more efficient in responding to calls, stating that in earlier years it would take up to four days to respond to calls.

As a way to track calls, Management stated:

*"We do daily, monthly, and yearly reports to monitor ACO calls completed, calls taken, length of time on each call, etc. We can run those reports at any time."*

However, management has not developed written policies and procedures for the processes used by ACOs on-site and in the field.

Without written policies and procedures, unauthorized deviations from established processes for impound, inspections, and other ACO responsibilities could occur. Unauthorized deviations could impact the time for responding to calls making the processes less efficient.

Written procedures provide guidance that is necessary to properly and consistently carry out departmental activities at a required level of quality. The establishment of the procedures provides the opportunity for management to ensure that adequate processes/internal controls have been established. Procedures also support the cross-training and backup for key staff functions. It is management's responsibility to establish written internal procedures covering key department processes. The procedures should be in sufficient detail to provide standard performance criteria and reduce the risk of misunderstanding and/or unauthorized deviations that could cause processing errors.

**We recommend** Management develop formal written policies and procedures for Animal Control Officers for all on-site and field processes.

**Management Response:**

Concur and In Progress. Completed Animal Control Officers (ACO) Manual is currently in the review and approval process.



## **11. Staffing Levels Of Animal Control Officers May Be Inadequate.**

Pinellas County and other local governments across the country continue to deal with ongoing reduced revenues. The dramatic revenue declines began in Fiscal Year 2008 and created challenges for management. County government had to fit its operations to match the reduced revenue. This resulted in the elimination of some programs and significant reductions in others. The County had to reshape County operations (government) by restructuring, reorganizing, resizing, and realigning the organization to provide an efficient and effective array of services, which included staff reductions in Animal Services.

Staffing levels of Animal Control Officers (ACOs) is considerably lower than the averages recommended by the Florida Animal Control Association best practices. Management agreed that Animal Services is understaffed for ACOs; however, they stated some services have been eliminated due to budget cuts, which would impact the minimum requirement for staffing. In addition, management said that the population density for Pinellas County is very high, with over 3,000 people per square mile (land area of 280 square miles). Both of these factors could potentially affect the level of staff recommended by the Florida Animal Control Association.

Management stated they cannot maintain the ACO staffing levels recommended by Florida best practices due to county budget cuts. Budget cuts have prevented Animal Services from hiring additional ACOs.

Inadequate staffing levels for ACOs could potentially affect the quality, efficiency, and types of services available for Pinellas County animal control.

The Florida Animal Control Association (FACA) states the following regarding best practice staffing levels for Animal Control Officers:

### ***"Recommended Staffing***

*FACA recommends that the minimum staffing levels for Animal Control officers would be one (1) Field-deployed Animal Control Officer for every 15,000 -18,000 population. Population density, urban versus rural environments, budget, severity of the problems, etc. are factors that play a role in this staffing recommendation."*

**We recommend** Management compare their actual staffing levels to those described in the Florida Animal Control Association best practices. Any significant differences should be analyzed to determine if they are justified.

### **Management Response:**

Partially Concur and Planned. Staffing and services were reduced to current levels with budget cuts in recent years. The department plans to complete a comparison with other comparable community shelters of staffing for current service levels. The department will take a holistic



approach to staffing increases since increases in field staff leads to other systemic staffing impacts that needs to be addressed, such as increased intakes from the field will increase the need for animal care staff in the shelter, veterinary staff to address medical issues, and customer service staff to promote adoptions and reuniting strays with owners.

## **12. Utilize PetPoint System Functionality To Enhance Efficiency And Effectiveness Of Operations.**

There are opportunities to improve the efficiency of operations through system automation. The new PetPoint System should be configured to utilize and share data collected through all aspects of the operations.

### Inspections of Pet Dealerships and Kennels:

- A. Last Inspection Date, Next Inspection Date, Permit Active Thru Date, Permit Payment Date, Next Permit Renewal Date, and Dealer/Boarder Status should be on the same screen.

When payment is made for a permit renewal, the Next Inspection Date, Permit Active Thru Date, and Next Permit Renewal Date, should automatically change in the automated system (payment is not likely to be received on the same date that a permit expires).

- *If payment is early*, Next Permit Renewal Date should be set to one year from Permit Active Thru Date, and the Permit Active Thru Date should then be set to one year later.
- *If payment is late*, Next Permit Renewal Date and Permit Active Thru Date should be set to one year from Permit Payment Date.
- *If payment is overdue*, Next Permit Renewal Date and Permit Active Thru Date should be set for a warning message. The warning message should appear when accessing the dealer/boarder record.

In any case, Next Inspection Date should be based on Next Renewal Date - usually a month or so prior.

- B. For new dealers/boarders:

- Permit Active Thru Date and Next Permit Renewal Date should be automatically set to one year from Permit Payment Date.
- The Next Inspection Date should be automatically set to three months from Permit Payment Date.



- After the 3 month inspection, the Next Inspection Date should be based on the Next Renewal Date - usually a month or so prior.
- C. A follow-up dealer/boarder inspection report, printable on demand, should be available to help track return visits that are necessary if the dealer/boarder is not at home the first time an officer attempts to do an inspection.

Enforcement:

- A. If an officer in the field finds the breed or sex of an animal associated with its tag to be incorrect, there should be a way to flag this for further research and/or direct update. The system should generate a list printable on demand and upon inquiry. The record should indicate that there is a discrepancy similar to that of an expired tag or dangerous animal warning.
- B. If an officer issued a warning and will follow-up or left a note on a citizen's door, the system should track this and create a reminder that can be printable on demand.

Inspection of Rescue Groups:

- A. Codes used for violations and actions should be appropriate and better describe the violation or action taken. A unique code should be available to identify inspections of rescue facilities or foster homes.
- B. Training should be provided to officers to ensure consistent use of codes.
- C. When one call has multiple purposes, such as an inspection of a rescue as well as an investigation of an individual pet owner based on a complaint, the system should be able to record the findings independently without having to enter two separate Call Detail Reports.
- D. A rescue inspection report should be available by date range.
- E. A follow-up rescue inspection report, printable on demand, should be available to help track return visits that are necessary because rescue facilities or foster homes were not available the first time an officer attempts to do an inspection.
- F. All rescue group information should be kept in the database and be accessible and printable. Signed forms and attachments should be scanned and connected to the database record for each rescue group.

Pet Stores:

- A. Pet Store information and statistics about adoptions and returns should be kept in the system.



- B. When change of owner information is available, it should be kept up in the system to ensure the least amount of license renewal reminders.
- C. Reporting and inquiry by a category, such as Pet Store, as well as by unique identifier for each participating Pet Store, should be printable on demand.

**Partners:**

- A. Partner application forms and attachments should be kept in the database.
- B. Reports and inquiry by Partners should be printable on demand.
- C. Statistics about adoptions and returns, if any, should be kept in the system.

**Controlled Substances:**

- A. Automate handwritten logs into a spreadsheet or computer generated form, which could use formulas to calculate totals.
- B. Develop an automated control by programming the spreadsheet or form to reconcile drug usage from the surgery log to the drug usage log.
- C. Develop security for each spreadsheet or form and create computerized signature based on the user's login.

The prior system was comprised of multiple modules, which were not designed to work together, but rather to operate independently. In addition, numerous programmers built the modules at different times in the life cycle of the system. Over time, as programming support for the system changed, sufficient transfer of knowledge did not take place, thus making enhancements difficult and costly, and functionality inconsistent.

Limitations of the old system lead to the lack of confidence in the database and difficulty in retrieving information from it. In some cases, the same information had to be entered in multiple places leaving room for mistakes or omissions. In other instances, there was not a place to enter information and individual spreadsheets had to be kept outside the database. Taking advantage of automation available within PetPoint should:

- Provide application controls that enhance the quality of information provided by the application.
- Provide greater efficiency for follow up and inspection processing in the enforcement area.
- Provide greater efficiency for the maintenance and reconciliation of controlled substance logs.
- Enhance reporting and inquiry capabilities, thus providing more meaningful information.



The recently purchased PetPoint System should be configured to take advantage of automated system controls and database features not possible with the system in place during our audit.

**We recommend** Management work with their vendor to configure and implement system improvements available within the PetPoint application.

**Management Response:**

Concur and In Progress. Animal Services went live with the PetPoint software system on April 23, 2015. PetPoint is an off-the-shelf system. Management has worked with the vendor to implement as much efficiency as possible and appropriate. Animal Services will continue to work with PetHealth to continue to implement additional improvements.

**Citizens' Complaints:**

The table below depicts the various citizens' complaints received by the Division of Inspector General regarding Pinellas County Animal Services. Each complaint, except those noted in the second table below titled, "Citizens' Complaints Not Reviewed in Audit," was incorporated into our audit fieldwork program. The Opportunities for Improvement in this report provide recommendations to management for those areas/complaints warranted as a result of the testing and observations of the audit fieldwork.

<b>Citizens' Complaints Reviewed In Audit*</b>	
1.	The inserting of microchips into animals is performed by staff and not just Veterinarians.
2.	Funds raised at pet stores are being misused.
3.	The facility is not clean.
4.	Volunteers are no longer allowed to roam in all areas.
5.	The number of volunteers is lower than before.
6.	The number of pet adoptions is lower than before.
7.	More dogs are being destroyed.
8.	Pit bulls are not allowed to pass survival tests.
9.	The maintenance man is allowed to perform exams and to euthanize dogs.
10.	There are insufficient funds to send dogs to afterhours emergency care facilities.
11.	The rescue program does not exist anymore.
12.	Dogs and cats are spayed and neutered, then destroyed, wasting taxpayers' money.
13.	Dogs are left to stay in buildings # 200 and 300 so less of them pass their exams.
14.	The County and SPCA facilities are passing dogs back and forth between each other in order to distort death records.
15.	The County is not complying with all State and County laws.
16.	Reducing the holding period to 3 days maximum has resulted in higher kill rates.
17.	Under current management: A) there are more kills, B) the number of pet owner requests for euthanasia has risen, C) dogs deemed dangerous are denied food and water, and D) the number of dogs for adoption has decreased about 75%, yet the number of dogs arriving remains the same.
18.	There are more empty kennels than occupied ones.
19.	Local dogs are euthanized to make room for dogs transferred from out of state in order to generate more funds.
20.	Animal arrivals are not always recorded, just euthanized.
21.	State audits of controlled drugs are not performed.
22.	Employees purposely do not account for controlled drug use.
23.	Cruelty towards animals. Allegations of prior acts of cruelty towards animals were previously investigated and determined not substantiated by the Human Resources Department. The Division of Inspector General reviewed the investigation, conducted on-site observations, and reviewed policies and procedures related to the welfare of animals during our audit.

\*The sequential order of the complaints listed above has no relevance to the importance or priority of the complaints received.



**Citizens' Complaints Not Reviewed In Audit\*\***

- |    |  |
|----|--|
| 1. | Allegations that previous Animal Services and County management were improper or ineffective.                                |
| 2. | Allegations that management was mistreating employees and volunteers.  |
| 3. | Allegations of low employee and volunteer morale.  |
| 4. | Allegations of improper disciplinary actions taken for employees and volunteers.   |
| 5. | Allegations that previous and current management actions were inadequate to properly manage Pinellas County Animal Services. |

<sup>\*\*</sup>The Division of Inspector General did not review these five types of complaints because: A) They were oriented towards Human Resources' subjects, and B) Most of these had already been analyzed and reported to County Management by Human Resources on January 6, 2014.



# DIVISION OF INSPECTOR GENERAL

**KEN BURKE, CPA**  
CLERK OF THE CIRCUIT COURT  
& COMPTROLLER  
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