



**Internal Audit Division
Finance Department
DeKalb County**

**DEKALB POLICE DEPARTMENT
ANIMAL SERVICES AND
ENFORCEMENT**

COMPLIANCE REVIEW

AUGUST 2017

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TRANSMITTAL MEMORANDUM

DATE: August 14, 2017

TO: Zachary L. Williams
Chief Operating Officer/Executive Assistant
DeKalb County

James W. Conroy
Chief of Police
DeKalb County Police Department

FROM: Dianne McNabb
Interim Chief Financial Officer/Finance Director
DeKalb County

SUBJECT: Animal Services and Enforcement

RE: Compliance Review Due To Citizen Complaints

Attached is our report on Animal Services and Enforcement Operations. The issues raised in this report were discussed with you during the Exit Conference on August 2, 2017.

We appreciate the cooperation and assistance we received from the Animal Services and Enforcement employees during the course of this review. If you have any questions about the review or this report, please feel free to contact me at extension 404-371-2745.

Sincerely


Dianne McNabb, CPA

cc: Appendix E



TABLE OF CONTENTS

EXECUTIVE SUMMARY	----- 2
OBSERVATION DETAILS	----- 5
APPENDIX A ACKNOWLEDGEMENTS	----- 12
APPENDIX B DEFINITIONS AND ABBREVIATIONS	----- 13
APPENDIX C ASE QUARTERLY TRAINING COURSE SCHEDULE	----- 15
APPENDIX D ORGANIZATION CHARTS	----- 16
APPENDIX E DISTRIBUTION LIST	----- 18



EXECUTIVE SUMMARY

Background

Due to inquiries regarding Animal Services and Enforcement's (ASE) responses to citizens' complaints, we were asked to review ASE's operations in the following areas:

1. Standard Operating Procedures (SOP)
2. Training and Knowledge of County Code and State Laws
3. Code Compliance
4. Handling of Complaints
5. Record Maintenance and Documentation
6. General Operations
7. Transparency

We primarily reviewed operations related to Chapter 5 - Animals of the DeKalb County Code of Ordinances as this chapter contained the majority of the complaints under review.

Objective

Our objective is to determine that ASE officers are in compliance with County Code (and State Law, if applicable) and internal procedures (SOP).

Summary of Observations

During our review of operations at Animal Services and Enforcement, we observed the following:

- Standard Operating Procedures provided too little detail for adequately documenting complaints.
- Training was found to be sufficient for a basic understanding of County codes and procedures.
- We found responsibilities for enforcing County Code relating to animals is often over-lapping and not clearly defined between departments.
- Inability to track complaints.
- Inconsistency in documenting case files.
- A citizen's ability to determine the violation status is limited (transparency).

Overall Recommendation

We recommend that ASE continue to revise and implement procedures to adhere to existing standards, ensure compliance with County Code, and provide prompt and appropriate service to County residents.



Summary Management Response

Overall, ASE management concurs with the recommendations as outlined in our review; and has implemented corrective action or plans to implement corrective action regarding compliance and better addressing the concerns of citizens regarding Animal Services and Enforcement.

We have included Management's detailed responses and completion timeframes, for each recommendation, under *Observation Details* of this report:

1. Standard Operating Procedures (SOP)
 - Re: Revisions to SOP – 90 days completion
2. Training and Knowledge of County Code and State Laws
 - Re: Training – in compliance
3. Code Compliance
 - Re: Code Compliance – 30 days
4. Handling of Complaints
 - Re: Handling of Complaints – 30 days
5. Record Maintenance and Documentation
 - Record Maintenance: in compliance (*Note – We disagree with Management's response that ASE is "in compliance" with this observation, as explained in the Observation Details.*)
6. General Operations
 - Software systems: 30 days
7. Transparency
 - Transparency: 30 days



Approvals:

Original Signed by:

Dianne McNabb, CPA
Interim Chief Financial Officer/Finance Director
DeKalb County Government



OBSERVATION DETAILS

1. STANDARD OPERATING PROCEDURES (SOP)

The most recent version of the DeKalb County Animal Services & Enforcement (DASE) Standard Operating Procedures (SOP) is April 2015. Plans to update the SOP are a part of the division's process improvement benchmark. Citizens' perceptions are that the SOPs are in a constant state of revision and are never fully completed. In our review, we found that the SOP, while detailed in verbiage, lacked specificity in areas such as report writing/case-file documentation. This may be due to the amount of discretion the officer is allowed to exercise when addressing a complaint.

The SOP should outline a baseline of the Officer's duties as it relates to addressing and documenting a complaint. This is especially true with the most common complaints calls. The lack of specifics is due primarily to the amount of discretion an officer has in reporting a complaint call. The ability to exercise discretion applies to daily community policing, so it is not considered an anomaly. However, the consequence of not including a baseline within the SOP is inconsistency in reporting and documenting case files.

Recommendation

A review and any necessary revisions to the SOPs should be performed on a regular basis. Completion and publishing of updated SOPs must be in a timely fashion. In addition, a baseline of documentation for the most common types of calls must be included in the SOP. This will ensure consistency, while allowing officer discretion.

Management Response

Re: Revisions to SOP – 90 days completion

We will have the revisions completed by October 7, 2017 and have added it to Better Works to track completion. Furthermore, we will add it to an annual review or add any changes to the updated SOP manual as they occur.

2. TRAINING AND KNOWLEDGE OF COUNTY CODES AND STATE LAWS

Citizens repeatedly communicated a concern regarding the knowledge base of ASE Officers. The perception is that there is inconsistency in the interpretation of the County ordinances/codes, state laws, SOP, and other regulations regarding animal control enforcement.

Educational requirements for a DeKalb County ASE Officer are a high-school diploma or GED, with a preference of work experience in animal control enforcement.

ASE officers must complete the County's Animal Control Academy within one year of employment. The Animal Control Academy is an on-site/in-service quarterly training program, consisting of various courses, totaling 185 training hours (**See Appendix C**). Upon completion of the Academy, a training certificate is awarded to the DeKalb County



ASE Officer. According to a DASE Field Supervisor, ASE Officers are "...tested on comprehensive and practical application for humane force continuum and Chapter 5 Ordinance enforcement".¹

As per the most recent SOP, "Being an Animal Control Officer is a professional career choice. The days of being labeled as a "dog catcher" is no more. The role of the Animal Control Officer is now recognized as a profession rather than a job. This change in attitude is directly linked to the individuals employed by the DeKalb County Animal Services Enforcement Unit and the image they present to the public they serve..."²

There are no state mandated requirements for Animal Control Officers. A survey of neighboring counties consistently reported that training is primarily internal and on-the-job (Field Training Operations). One county reported taking advantage of external courses offered in animal control enforcement, with another county admitting that no training existed (suggesting only field training operations).

ASE Officers are also cross-trained on all division duties to obtain a better understanding of overall operations.

Recommendation

We found ASE's training to be sufficient for a basic understanding of County code and procedures. The discretion allowed ASE Officers might be perceived as a lack of knowledge. We recommend that the County continue to encourage and support officers, through budgetary measures, to obtain nationally recognized certification in animal enforcement such as the National Animal Care & Control Animal Control Officer (NACA ACO) or the National Animal Control & Humane Officer (NACHO).

Management Response

Re: Training – in compliance

We will continue to provide internal training and thank the County for its support of national certification training.

3. CODE COMPLIANCE

DASE is responsible for enforcing local and State laws as it pertains to the care and concern of the animal. This includes³:

- Complaints about animals;
- Rabies control;
- Vicious and dangerous animals; and
- Cruelty and neglect of animals.

¹ Email Interview with DASE Field Supervisor

² DASE SOP, Section 2.2 pg. 8

³ <http://www.dekalbanimalservices.com>



We limited the scope of our audit and did not specifically test for code compliance. We found that the responsibilities pertaining to animal control and enforcement between local and state agencies often overlap and may not be clearly defined or independent.

In addition, we have also found that within the County, departmental responsibilities for a singular animal control issue may not be clearly defined. An example is an issue regarding the health and living conditions of livestock or horses, which may require the involvement of several different departments. Citizens filing complaints are not always aware of which departments to contact in order for the issue to be fully resolved.

Recommendation

In circumstances that require cross-departmental involvement, we recommend informing citizens of that fact when an animal complaint is filed. We also recommend that DASE convey to the citizen which department manages a particular part of the overall issue and provide contact information for the appropriate department or office.

In addition to the County ordinances, DASE should consider expanding the information on its website to include guidance for particular issues involving animals, but not under the purview of DASE such as Code Enforcement or Planning & Sustainability.

Management Response

Re: Code Compliance – 30 days

We will continue to provide a citizen information about which department manages a particular portion of a complaint and provide contact information to that department (Code Enforcement, Sanitation, Department of Agriculture, etc.).

We are working with web site manager, LifeLine Animal Project, Heather Friedman, to add information to the Enforcement section of the web site outlining which sections of their complaint is the jurisdiction of Code Enforcement, Business Licensing, or the Department of Agriculture.

4. HANDLING OF COMPLAINTS

As communicated to us through interviews or documentation, citizens have shared concerns regarding:

- Phone calls were not returned for voice-mail messaged complaints.
- Some calls go unanswered during hours of operation.
- Callers are told they cannot file a complaint if they choose to be anonymous.

We inquired about and observed how animal complaints are handled by DASE. Citizens have three methods of filing animal control complaints:

- Called-in complaints
 - Through a dispatcher (during hours of operation)
 - Through 911 or CAD (after-hours of operation)
- Emailed complaints



- Faxed Service Request forms

We found there is no method to track incoming emailed complaints or voice-mail messages. Emailed complaints are going directly to the in boxes of the Director, Manager of Cruelty Investigations or Field Supervisors then forwarded to another officer for resolution. Service Request forms are the least used method of filing an animal complaint, and may be therefore obsolete and ineffective. With no method of tracking incoming emailed and voice-mailed complaints, it is difficult to verify that all complaint calls are addressed, no matter the method of receipt for the initial complaint. Lack of resources in staffing, obsolete systems/technology, or insufficient procedural training may contribute to animal complaints going unanswered in a timely fashion or at all. Regardless, public perception of County operations is diminished.

Recommendation

To facilitate tracking, we recommend that one electronic mailbox be set-up specifically for emailed complaints, instead of complaints going directly to individual County email addresses. We also recommend the elimination of Service Request Forms, unless those forms are PDF fillable and can be submitted on-line.

Management Response

Re: Handling of Complaints – 30 days

IT has set up a separate email box for emailed complaints and we are working with Heather Friedman (web site manager, LifeLine Animal Project) to eliminate the faxed Service Request Form and to create a fillable pdf form for emailed complaints.

Furthermore, as you recommended, I have set up a separate email folder to track complaints that come to my County email address.

5. RECORD MAINTENANCE AND DOCUMENTATION

We reviewed the records of DASE to obtain a better understanding of how records are kept and maintained. Within PetPoint, records can be kept for an infinite amount of time.

Hardcopy records are separated in two major complaint types:

- Bite cases (dog, cat/feline, bat)
- Cruelty/dangerous animals/neglect cases

A review of seven Bite case files found the files were mostly consistent in how the hardcopy record was maintained, with the following documents:

- PetPoint case sheet report
- Pictures (red paper)
- Incident report
- Notice to confine
- Vaccine history/records
- Letter regarding rabies



- Cage ID card
- Lab report (bat bites)

A review of 13 Cruelty/Neglect and Dangerous Animals case files found the files to be generally inconsistent in how the hardcopy record was maintained, including:

- Some cases were not in a file folder, with documents loose or stapled together.
- All reviewed records of this complaint type have pictorial evidence.
- A file folder contained two different cases, indicating that the records were mistakenly combined.
- Within the sample, only one file denoted the County ordinance, which was on a court order.
- Some case files were not shown as closed, indicating that PetPoint records were not updated.

We inquired about the inconsistency in records for the hardcopy case files. We were told that it was dependent upon the individual officer's record-keeping. We found that pictures are not taken for every field complaint call, due to the discretion of the officer.

Recommendation

We recommend that each hard-copy file contain documents routinely used for each complaint type while allowing officer discretion for any additional documentation that provides a full narrative of the complaint and resolution. Documenting every field call with pictorial evidence, especially where there is no violation, is labor-intensive and expends county resources. We suggest that an officer make every attempt to fully document field calls with as much detail as possible and, in certain scenarios, document with pictorial evidence even if the complaint is determined not to warrant further pursuit. This will serve to authenticate that the complaint was addressed.

Management Response

Re: Record Maintenance: in compliance

We will continue to document, narrate and preserve records in the existing software program.*

- * ***Note – We disagree with Management's response that DASE is "in compliance" with this observation. We found inconsistencies with both hardcopy and electronic records, and made recommendations based upon our observation.***

6. GENERAL OPERATIONS

The operations of Animal Services (shelter operations) falls under the managing responsibility of LifeLine Animal Project with its own budgetary cost center (CC).



The operations of Animal Enforcement (AE) falls under the reporting responsibility of Police Services, with its own budgetary cost center.

(See Appendix D)

Both the shelter and enforcement operations use the PetPoint System for data management.

- A survey of neighboring counties (six surveyed, four responded) was taken regarding the system used for animal control and enforcement.
- Most did not respond favorably to the PetPoint system.
- Respondents noted that PetPoint is better served for shelter use, not for animal control enforcement.
- Counties used other systems such as:
 - Adopt-A-Friend (also more shelter-friendly)
 - Comcate
 - ShelterBuddy

We observed the use of PetPoint by the dispatchers and obtained samples of complaint records. Although we have received differing opinions on the efficiency of the PetPoint system; and based upon our limited exposure, we found that if enough information is input into PetPoint, it serves the basic purpose of recording animal control complaints.

In addition to shelter and field operations, the DeKalb County Animal Services Advisory Board is a 13-member citizen-board and serves in an advisory capacity to the CEO and Board of Commissioners. Meetings are held on a monthly basis, allowing for public comment. We met with some Board members to obtain a better understanding of their role and current issues/concerns. The Board Chair provided copies of meeting minutes, various correspondence to County personnel, and a copy of a monthly incident report from ASE. The Board expressed concerns relating to records management, officer discretion and knowledge of County codes, and supervisory and jurisdictional responsibilities. The concerns communicated by the Advisory Board pair with the concerns prompting the review.

Recommendations

We recommend that the County take steps to determine which system works best for the overall needs of the enforcement division. This may result in investing in a better performing system for control and enforcement, investing in a higher version of PetPoint, or obtaining additional training for staff to maximize the use of the current PetPoint System.

We also suggest that the Animal Advisory Board and ASE work in conjunction to resolve concerns/issues regarding animal control and enforcement, and improve cohesion to better serve the community.



Management Response

Re: Software systems: 30 days

As recommended, we will review which software systems are available and the costs of those systems. While PetPoint was not designed for field enforcement complaints, it is free.

7. TRANSPARENCY

We reviewed the DASE web page <http://www.dekalbanimalservices.com/field-services> and found no mode of electronically filing (outside of email), tracking or following-up on an animal complaint. Citizens would have to contact DASE for all actions or file an Open Records Request (ORR). Even with a PetPoint case number, citizens would not be able to track or follow-up on a complaint without contacting DASE. We did not observe dispatchers providing the case number to complainants.

Recommendation

We recommend that the case number be provided to complainants during the initial call. For complaints that are submitted via email, we suggest that once the complaint is logged into PetPoint, a follow-up email with the PetPoint case number is sent to the complainant. A cross-reference should be input into the PetPoint notes section with the email receipt date. The original email should be input into a hardcopy complaint file.

Management Response

Re: Transparency: 30 days

It was recommended that each caller receive the case number at the time of the call. We have a new dispatcher hired starting the end of August which will allow this service addition. If a complainant calls back, we currently look up the response information by address. Many complainants prefer to remain anonymous so their name and call back information would not be captured.



APPENDIX A ACKNOWLEDGEMENTS

We would like to take this opportunity to thank the management and staff of Animal Services & Enforcement for their assistance during this engagement.

Conducted by:

Kimberly R. Wells
Principal Auditor
Finance Department - Internal Audit Division

Reviewed by:

A. Murray Walters
Principal Auditor
Finance Department - Internal Audit Division



APPENDIX B DEFINITIONS AND ABBREVIATIONS

Acronyms and Abbreviation

CAD – Computer-Aided Dispatch

CC – Cost Center

DASE/ASE – DeKalb County Animal Services & Enforcement/
Animal Services Enforcement

DCAS – DeKalb County Animal Services

FTO – Field Training Operations

NACA ACO – National Animal Care & Control Association Animal Control Officer
(national certification)

NACHO – National Animal Control and Humane Officer (national certification)

SOP – Standard Operating Procedures

Key Definitions

Animal – Every living vertebrate except a human being.⁴

Computer-Aided Dispatch (CAD) – A method of dispatching, assisted by computer. CAD services can include call input, call dispatching, call status maintenance, event notes, field unit status and tracking, and call resolution and disposition.

Cost Center – County department that does not produce direct profit and adds to the cost of running the organization. Assigned to each cost center, is a distinct numerical code used for budgetary purposes.

DeKalb County Animal Services Advisory Board – A thirteen (13) member board of DeKalb County citizens which serves in an advisory capacity to the DeKalb County CEO and Board of Commissioners for a term of three (3) years.

"Responsibilities include monitoring the master plan to insure its implementation in the provision of professional practices including efficient service delivery and updated clean facilities....this board serves as a liaison to animal advisory groups, animal professionals, and County government for the purpose of creating a method of clear communication."⁵

⁴ DeKalb County Muni Code – Chapter 5 – Animals - https://library.municode.com/ga/dekalb_county/

⁵ <https://dekalbcountyga.granicus.com/boards/w/968f9572ef2211df>



DeKalb County Animal Services Division (DCAS) – Provides care for the animals at the shelter, veterinary care including spay/neuters, pet adoptions, animal reclaims, volunteers, foster homes and rescue group coordination. Currently managed by LifeLine Animal Project.

DeKalb County Animal Enforcement Division – Enforces County animal ordinances and state laws including handling complaints about animals, rabies control, vicious/dangerous animals, and animal cruelty/neglect. The Division is under the DeKalb County Police Department.

LifeLine Animal Project – A non-profit organization...promoting homeless pet adoption, providing affordable spay/neuter services, increasing public awareness, and advocating for lifesaving public policy.⁶

PetPoint – Web-based data management system used by organizations to produce and house electronic animal welfare and animal complaint records.

⁶ <http://dekalbanimalservices.com/>



APPENDIX C ASE Quarterly Training Course schedule

COURSE SCHEDULE	TRAINING HOURS
Supervisor FTO* (Ride-A-Long)	6
FTO* (Ride-A-Long)	102
Court Room Procedures/Court Attendance	9
Administration Procedures**	12
Animal Recognition	1
Rabies Control Procedures***	3
Interview Techniques	1
Animal Behavior/Handling	4
Animal Handling in Traps	2
Radio Codes	9
Field Codes	12
Animal Health Regulation/Zoonosis	2
Ethics	1
Interview Techniques	1
Report Writing	3
Cruelty/Neglect Procedures	4
Dangerous Animal Procedures	2
Ordinance Codes	9
Public Speaking/Presentations	2
Total	185 Hours

*FTO (Field Training Operations) – includes several other course subjects while out in the field.

**Administration Procedures – included customer service and telephone etiquette.

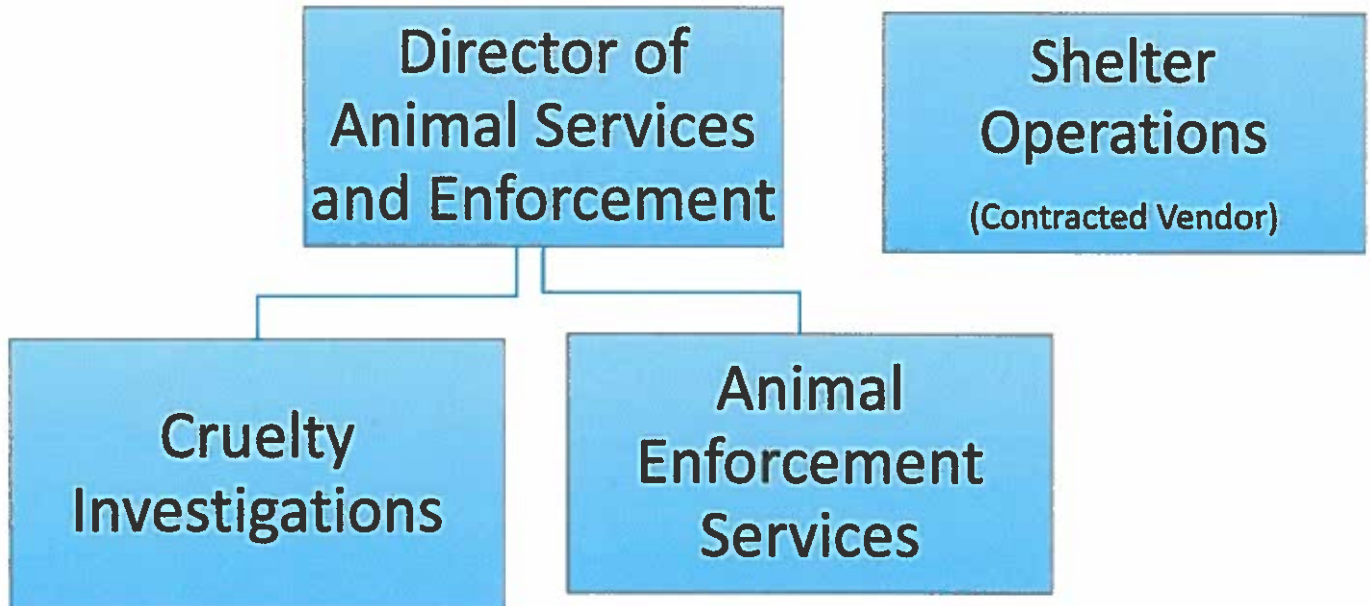
***Rabies Procedures – includes rabies testing/lab specimen preparation/decapitation.

The number of training hours equates to slightly over 23 work-days of training.



APPENDIX D ORGANIZATION CHARTS

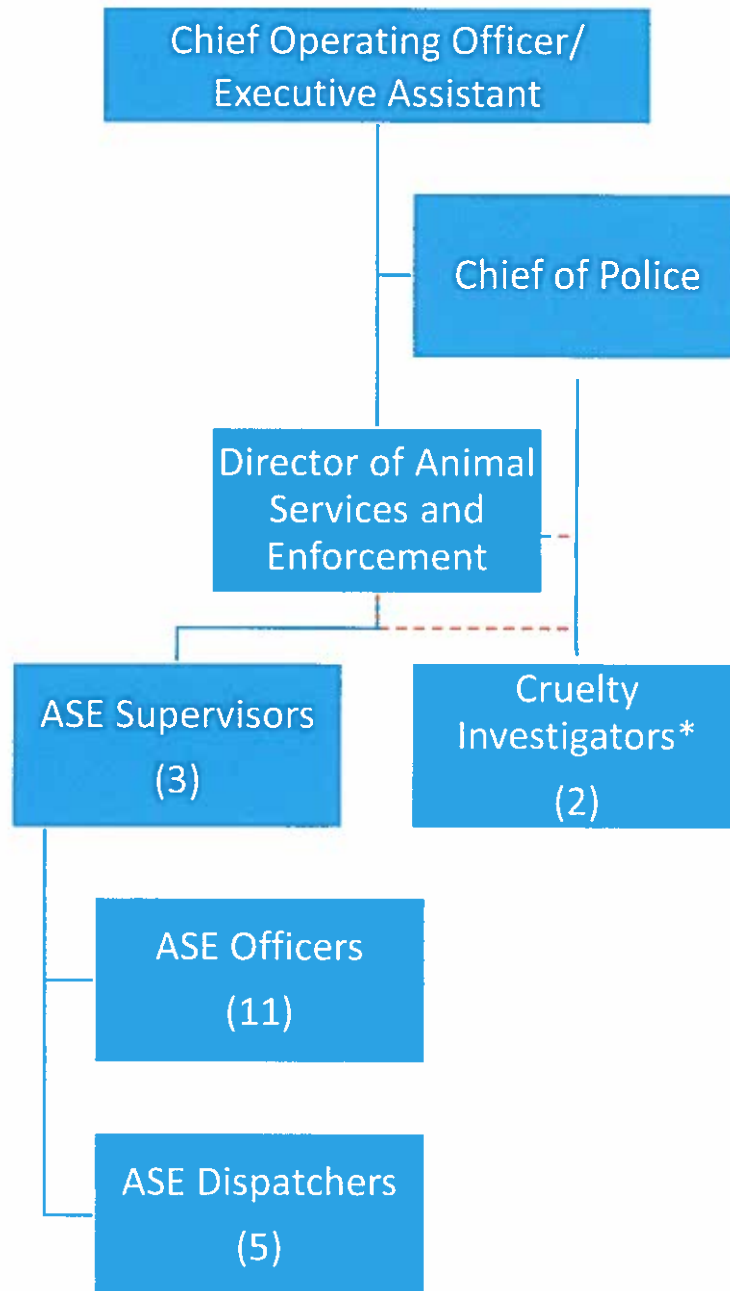
Animal Services and Enforcement Division Organization Chart



*Budgetary organization chart provided by DASE
Shelter operations is managed by LifeLine Animal Project (contract vendor)*



Animal Enforcement Division Organization Chart



*As reported to Finance-Internal Audit Division, the Director of ASE reports directly to the COO, and reports to the Chief of Police for day-to-day operations. In addition, the Cruelty Investigators report to the Chief of Police for all police-related matters and to the Director of ASE on animal-related matters (day-to-day operations).



APPENDIX E DISTRIBUTION LIST

This report has been distributed to the following individuals:

DeKalb County Board of Commissioners

Michael L. Thurmond, Chief Executive Officer

Xan Rawls, Director of Animal Services and Enforcement

Preston L. Stephens, Interim Assistant Finance Director