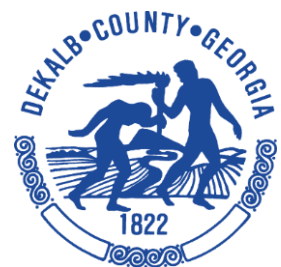


Audit Report No. 2018-003-PSAE
July 2020

DEKALB COUNTY GOVERNMENT
DeKalb County Animal Enforcement

FINAL REPORT



John L. Greene, CIA, CIG, CGAP, CGFM
Chief Audit Executive

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John Greene
Chief Audit Executive

DEPARTMENT OF PUBLIC SAFETY
AUDIT OF ANIMAL ENFORCEMENT
REPORT NO. 2018-003-PSAE

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What We Did

In accordance with the Office of Independent Internal Audit's (OIIA) Audit Plan, we conducted a performance audit to assess whether the DeKalb County Animal Enforcement Division (Animal Enforcement) implemented corrective action to address the deficiencies outlined in the audit report by the Finance Department's Internal Audit Division (IA's August 2017), "**DeKalb Police Department Animal Services an Enforcement Compliance Review**", dated August 14, 2017. This report evaluated the operating effectiveness of the program. We examined their processes and Standard Operating Procedures (SOP's) to identify opportunities for improvement and verify compliance with DeKalb County's (County's) Code of Ordinances Chapter 5-Animals.

We interviewed Animal Enforcement staff, performed walkthroughs of the dispatch, citation, and Georgia Open Records Act (ORA) processes, and participated in a ride-along with an animal control officer (officer). Additionally, we interviewed staff and management and examined supporting documentation related to training, bite cases, citations, and ORA request transactions to identify opportunities to strengthen the effectiveness and efficiency of Animal Enforcement processes.

What We Found

As a result of this performance audit of Animal Enforcement, we determined that Animal Enforcement had not implemented many of the recommendations cited during the previous audit. Management noted that the main reason for this was the significant staff turnover and limited resources. In addition, we identified control deficiencies and instances of noncompliance with County ordinances and Georgia law regarding animal control. We also noted that management has begun addressing many of the issues listed below:

- Standard operating procedures were not current.
- Training procedures for Animal Control Officers need improvement.
- Some officers have not completed training for chemical immobilization.
- Records were not maintained for dangerous animal registrations.
- PetPoint system (System) was not always updated with the court's dispositions for animal incidents.

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What We Recommend

We recommend that Animal Enforcement management develop and implement the following processes and procedures to strengthen compliance with the County's animal ordinances, as summarized below:

- Update SOP's to be consistent with the County's current procedures. In addition, include a checklist in the SOP manual of the documents required for all types of cases.
- Implement continuous and ongoing training for staff regarding SOP's and require documented acknowledgment of their understanding of the procedures.
- Update SOP's to ensure they are consistent with current County ordinances, policies and procedures, and State laws and implement procedures to ensure SOP's remain current.
- Implement procedures to help ensure all training records are retained in each officer's file.
- Implement procedures to help ensure Animal Enforcement staff is properly trained and continue this training to maintain competency and certification requirements and ensure proper documentation is included in the files for all chemical immobilizations.
- Develop and implement written chemical immobilization policies and procedures regarding proper recording and reporting of dart inventory and usage, handling of drug-administering equipment, animal handling, and post-capture care and monitoring.
- Establish policies and controls over the release of darts provided by the veterinarian at the shelter.
- Implement procedures to help ensure officers remain certified in the use of chemicals.
- Implement procedures to help ensure proper documentation is included in the files for all actions performed pertaining to the chemical immobilization of an animal.
- Implement procedures to help ensure a log is maintained to record and track dangerous animal cases.
- Create a checklist to ensure case files are complete with all the documents required for registering a dangerous animal.
- Determine if the System has the functionality to track and store dangerous animal documents. If not, invest in a software system that can track enforcement cases, such as dangerous animal cases.
- Implement procedures to help ensure information regarding case disposition and follow-up is updated in the System.

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BACKGROUND AND INTRODUCTION

Animal Services and Enforcement is a department of the County's Office of Public Safety. The Enforcement and the Animal Services Division are in different location within the County. Animal Enforcement services the following cities within the County: Dunwoody, Brookhaven, Stone Mountain, Stonecrest, Tucker, Avondale, Chamblee, Clarkston, and Pine Lake. Animal Enforcement also provides services for the cities of Doraville and Decatur when their officers are off duty, although these cities have their own Animal Control units.

Animal Enforcement is responsible for enforcing the County's Chapter 5-Animals Ordinance¹ and Georgia State laws² relating to animal welfare and public safety. Animal Enforcement's primary services include handling complaints about animals, rabies control, dangerous animal registration, cruelty and neglect investigations, providing the public and pet owners with humane treatment education, and pet care information. Additionally, Animal Enforcement refers citizens to the appropriate agencies that can handle complaints that do not fall under Animal Enforcement jurisdiction, such as pest and rodent removal.³

Animal Enforcement has a staff of 17 employees, which includes three animal control supervisors, nine officers, and five dispatchers. However, Animal Enforcement was funded for 22 positions for the fiscal years (FY's) 2017 and 2018, which includes one director, one police sergeant, one police detective, three animal control supervisors, 12 officers, and four dispatchers. The two police positions remain under the umbrella of Police Department and the Animal Services cost center is inter-funded for the cost of these positions. The budget for Animal Enforcement has increased five percent, from \$4,170,476 in FY 2017 to \$4,383,600 in FY 2018.

County citizens can submit complaints to Animal Enforcement through email or telephone. From August 15, 2017, to October 31, 2018, Animal Enforcement responded to 13,701 complaints. **Exhibit 1** on the following page is a summary of complaints by category retrieved from the System.

¹ DeKalb County, GA Code of Ordinances Chapter 5 - Animals

² 2018 Georgia Code Title 31- Health Chapter 19 – Control of Rabies §31-19-4. Duty of notification. GA Code §31-19-4 (2018)

³ DeKalb County Animal Enforcement Division's Standard Operating Procedures Section 1.5

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PUBLIC SAFETY - ANIMAL ENFORCEMENT CASE TYPE, NUMBER, AND PRIORITY LEVEL (August 15, 2017 to October 31, 2018) EXHIBIT 1			
Category	Priority Level	Number of Cases	Percentage <i>(Total Number of Cases)</i>
Bite/ Scratch	High	794	6%
Cruelty/ Neglect	High	362	3%
Animal Owner	High	33	0%
Enforcement	High, Medium	216	2%
Seizure	High, Low	12	0%
Aggravated Situation	Medium	135	1%
Stray	Medium, Low	11,234	82%
Administrative	Low	1	0%
Wildlife	High, Medium	590	4%
Transport	Low	194	1%
Livestock	High, Medium	130	1%
Total		13,701	100%

Officers respond to complaints according to priority. Animal Enforcement SOP classifies complaints as high, medium and low priority. High priority complaints include possible rabid or injured animals, bite cases, rescues, school animal complaints, dangerous animal complaints, evictions, and cruelty investigations. Medium priority complaints involve nuisance, general animal complaints, abandoned animals, and complaints from the County's Board of Commissioners. Low priority complaints consist of officers responding to stray and abandoned animals and evictions of tenants from their property.⁴

When a citizen submits a complaint, the dispatcher obtains the details of the complaint and determines whether or not an officer can resolve the complaint. If the officer can resolve the complaint, the dispatcher will enter all details of the complaint into the System. Once the information has been recorded in the System, the information is given to the dispatcher operating the Computer Aided Dispatch (CAD) system. The dispatcher enters the information into the CAD system and sends it to the officer patrolling the corresponding area.

Animal care and other related animal services are managed by a third-party organization, LifeLine Animal Project. This is a non-profit organization that operates the County's

⁴ DeKalb County Animal Enforcement Division's Standard Operating Procedures, Section 4.5

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shelter. LifeLine’s responsibilities include providing humane care for the animals at the shelter and veterinary care, such as spaying, neutering, pet adoptions, animal reclaims, etc.

AUDIT RESULTS

The OIIA reviewed the prior findings identified during IA’s August 2017 audit to determine the implementation status of the prior audit’s recommendations. No additional audit work was performed for these findings other than determining the statuses. However, the current audit’s objectives included reviewing several of the processes and procedures reviewed during the prior audit. Below (**Exhibit 2**) is a summary of Animal Enforcement’s implementation status for the recommendations outlined in Finance’s Internal Audit report:⁵

IMPLEMENTATION STATUS OF RECOMMENDATIONS FROM FINANCE-INTERNAL AUDIT REPORT EXHIBIT 2		
Issue	Recommendation	Status
Finding 1 - Standard Operating Procedures	a) Review & revise the SOPs on a regular basis. b) Complete & publish updated SOPs in a timely fashion. c) Include a baseline for the most common types of complaints in the SOP.	NI
Finding 2 - Training and Knowledge of County Codes and State Laws	a) Ensure training is sufficient to convey a basic understanding of County code and procedures. b) Encourage obtaining nationally recognized certification in animal enforcement.	NI
Finding 3 - Code Compliance	a) Inform citizens when their complaint requires cross-departmental involvement. b) Inform citizens which department manages a particular part of the overall issue. c) Expand information on the website to include guidance for particular issues involving animals that are not under the jurisdiction of Animal Enforcement.	PI (a & b) I (c)
Finding 4 - Handling of Complaints	a) Utilize electronic mailbox set-up specifically for the tracking of emailed complaints. b) Eliminate the Service Request Form; unless the form is PDF fillable & can be submitted on-line.	I
Finding 5 - Record Maintenance and Documentation	a) Ensure each hard-copy file contains documents routinely used for each complaint type. b) Include any additional documentation in the files that would provide a full narrative of the complaint and resolution with as much detail as possible.	NI

⁵ DeKalb County Internal Audit – Finance Department, DeKalb Police Department – Animal Services and Enforcement Compliance Review (August 2017)

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IMPLEMENTATION STATUS OF RECOMMENDATIONS FROM FINANCE-INTERNAL AUDIT REPORT EXHIBIT 2		
Issue	Recommendation	Status
Finding 6 - General Operations	a) Determine which system works best for the overall needs of the enforcement division. Investing in a better performing system, higher version of the current application, or obtaining additional training to maximize the use of the current application.	NI
Finding 7 - Transparency	a) Provide the case number to complainants during the initial call. b) Send a follow-up email with the System's case number to complainants who submitted complaints via email. c) Enter cross-reference information into the System's notes with the email receipt date.	I (a & b) PI (c)
I = Implemented, PI = Partially Implemented, NI = Not Implemented		

We reviewed all open cases in the System during the audit period and determined that there were 376 open cases. We determined that Animal Enforcement did not promptly close cases in the System once an animal incident has been resolved. Below (**Exhibit 3**) is a summary of the number of open cases in the System during the audit period by category. The majority of the cases range between low and medium priorities and involve strays.

OPEN CASES AND PRIORITY LEVEL (August 15, 2017 to October 31, 2018) EXHIBIT 3				
Category	Priority Level	Number of Open Cases	Percentage <i>(Open cases to Total number of Cases)</i>	Average Age of Open Cases (Days)
Cruelty/ Neglect	High	14	4%	735
Enforcement	High, Medium	4	2%	782
Seizure	Low	1	8%	772
Stray	Medium, Low	342	3%	752
Wildlife	High, Medium	9	2%	737
Transport	Low	4	2%	787
Livestock	High, Medium	2	2%	790
Total		376	3%	765

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Our findings and recommendations are outlined below. We believe these will assist Animal Enforcement in achieving its mission.

FINDING 1- STANDARD OPERATING PROCEDURES (SOP's) WERE NOT CURRENT

Objective: Obtain and examine the Standard Operating Procedures to ensure adequacy and completeness.

Criteria: The SOP references Animal Enforcement as being responsible for enforcement of the DeKalb County Animal Services Ordinance in Section 1.5, "Services." The actual ordinance is the Ordinance Chapter - 5 Animals.

The National Animal Care and Control Association (NACA) believes all agencies providing animal care and control services should strive toward utilization of their guidelines as they identify their goals and define the policies that guide their actions.

Condition: During our audit, we examined the Public Safety Animal Enforcement SOP's and noted that they do not reflect the current processes and procedures being performed by Animal Enforcement personnel (**Exhibit 4**). In addition, we noted that the SOP's did not reference the following:

- All applicable Georgia State laws.
- Guidance on some sections of the County's Chapter 5 Animals Ordinance. (**Exhibit 5**)
- Applicable animal control guidelines recommended by NACA. (**Exhibit 6**)

The exhibits below outline the results of our examination.

Current Procedures Not Updated in the SOP	
EXHIBIT 4	
Procedure/ Topic	Issue
Chemical Immobilization	Section 4.14 "Chemical Capture" outlines the procedures taken to chemically immobilize an animal but did not have procedures on how to report the capture methods.
Citations	Section 5.8 "Citations" were updated to reflect current procedures.
Georgia Open Records Request	Section 5.9 "Open Records Requests" were not updated to reflect current procedures.

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Current Procedures Not Updated in the SOP	
EXHIBIT 4	
Procedure/ Topic	Issue
Chain of Command	Section 1.4 "Organizational Chart" was not updated to reflect the accurate reporting structure.
Animal Complaints	Section 1.5 "Services" did not outline what complaints are not handled by Animal Enforcement or the department responsible for handling those complaints.
Radio Dispatching	Section 5.1 "Radio Dispatching" lists codes that Animal Enforcement no longer used and should be removed. The CAD dispatcher no longer use activity sheets; however, the procedures had not been updated to reflect this change.
Emailed Animal Complaints	Section 5.2 "Service Calls" were not updated to reflect current procedures.
Bite Case Reporting	Section 5.3 "Bite Case Coordinator" were not updated to indicate that the Georgia Department of Public Health is responsible for following up with bite victims if the animal is not taken into custody within four days.
Report Writing	Section 2.5 "Report Writing" and Section 2.10 "Paperwork/ Reports" only has general guidelines on how to document and write reports.
Research Prior Violation Location	The SOP did not mention whether the Officer should research a location's history of complaints to determine if there have been prior violations at the incident location.
Humane Education Program	This SOP did not mention what education Animal Enforcement offers to the community.

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<u>Ordinance Topics Not Mentioned in SOP's</u>	
EXHIBIT 5	
Procedure/ Topic	Issue
Sec. 5-14 – Transportation of animals in open air vehicles	The SOP did not outline procedures to ensure consistent handling of these incidents that occur infrequently. Including these procedures in the SOP's helps ensure compliance with the ordinance.
Sec. 5-15 – Hazardous animals	
Sec. 5-16 – Guard dogs	
Sec. 5-26 – Transient animals	

<u>NACA Guidelines Not Listed in SOP's</u>	
EXHIBIT 6	
Procedure/ Topic	Issue
Cash Handling	Animal Enforcement charges citizens a refundable fee for the issuance of traps but there are no procedures on how to record or process these fees. Specific guidelines for handling these receipts help reduce the risk of fraud.
Emergency Operations Procedures	SOP's did not contain information about a disaster planning and response program.
Mandated Reporting (Child or Elder Abuse) Requirements	Officers frequently respond to situations where children, elders, or disabled persons are involved or present, but there are no procedures for reporting these situations when they are encountered.

Cause: Current management noted that turnover in staff has impacted the program's ability to keep SOP's current.

Consequence: When policies and procedures are not updated, it increases the risks of employees not being aware of job requirements and noncompliance with the County's Chapter 5-Animals Ordinance and State laws. Furthermore, it increases the risks of harm to the officers, animals, and County residents.

Recommendation: We recommend that Animal Enforcement management:

- Update SOP's to be consistent with the County's current procedures. In addition, include a checklist in the SOP manual of the documents required for all types of cases.
- Implement continuous and ongoing training for staff regarding SOP's and require documented acknowledgement of their understanding of the procedures.

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- Update SOP's to ensure they are consistent with current county ordinances, policies and procedures, and State laws and implement procedures to ensure SOP's remain current.

Management Response: *Standard Operating Procedures were reviewed, updated, or created to reflect the current DeKalb County Animal Ordinances and Georgia State Laws. Policies and procedures were updated to include checklists of significant case types.*

- **Chemical Immobilization** – *Updated procedures are in place to report department capture methods. All chemical immobilization actions are being properly documented. Please reference section 5.27 of the Standard Operating Procedures.*
- **Citations** – *Per sections 3.7 and 5.30, "Citations" have been updated to reflect current procedures for office and field personnel. Defined issuance procedures have been established. A case closure accountability checklist was implemented.*
- **Georgia Open Records Request** – *The Standard Operating Procedures were reviewed and have been updated. Animal Enforcement Supervisor review and authorization is required to eliminate errors and ensure proper execution. Please reference section 3.8, Open Records Request. Please reference section 3.8, Open Records Request.*
- **Chain of Command** – *The Chain of Command is outlined in an organizational chart, which reflects the reporting structure and authority levels. Please refer to section 1.4.*
- **Animal Complaints** – *The Standard Operating Procedures have been amended to define services provided by Animal Enforcement. Citizens will be referred to the appropriate agency when the complaint or concern does not fall within the jurisdiction of Animal Enforcement. Please refer to section 1.6 for additional detail.*
- **Radio Dispatching** – *Radio dispatching lists were updated to reflect current active codes, signals, and associated meanings. CAD dispatcher procedures have been updated and outlined in section 3.5.*
- **Emailed Animal Complaints** – *The procedure for handling emailed complaints was updated and reflects the process currently being followed. Please refer to section 3.3.*
- **Bite Case Reporting** – *The Bite Case Coordinator procedure has been amended to reflect the protocol for cases when the animal is not able to be taken into custody. Animal Enforcement is responsible for the follow-up with bite victims. Victims will be notified by phone or in-person to schedule an appointment with a physician and/ or poison control center for recommended treatment. Please refer to section 4.1.*
- **Report Writing** – *"Memo writing" guidelines for routine calls have been outlined in section 5.16. "Incident Report" writing guidelines have been defined with*

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supporting examples to ensure an appropriate narrative is captured on cases requiring more detail. Please refer to section 5.24.

- **Research Prior Violation Location** – The Standard Operating Procedures were updated and now require a location history check be completed on all new complaints to determine previous complaint history. Please refer to section 3.4.
- **Public Education Programs** – The Standard Operating Procedures were updated to reflect the participation of Animal Enforcement officers in educating the community regarding animal issues. Officers are well-versed and always prepared to represent DeKalb Animal Enforcement at various functions ranging from neighborhood meetings to county-wide events. Officers will dress in complete and clean uniform attire unless otherwise instructed. Please refer to sections 6.1 and 6.2.
- **Transportation of Animals in Open Air Vehicles** – Expectations and procedures for handling unrestricted animals in open-air vehicles are outlined. Animal Enforcement and other Public Safety Agencies observing this violation are required to address the concern as deemed appropriate by job description. Please refer to section 5.31.
- **Hazardous Animals** – The Standard Operating Procedures have been updated to align with DeKalb County Ordinance 5-15, advising hazardous animals are not allowed unless prior approval from the Police Chief has been received. Please refer to section 5.31.
- **Guard Dogs** – The Standard Operating Procedures have been updated to align with DeKalb County Ordinance 5-16, clearly defining the rules and owner requirements for dogs deemed to be “guard dogs”. Please refer to section 5.31.
- **Transient Animals** – The Standard Operating Procedures have been updated to reflect the DeKalb County Ordinance 5-26. Thus, the guidelines for handling animals shipped or transported through DeKalb County for less than 15 days are clearly defined. Please refer to section 5.31.
- **Financial Transactions** – Procedures for recording and handling fees collected for the issuance of animal traps and “Dangerous Animal” registrations have been clearly defined. Please refer to section 3.10, “Financial Transactions.”
- **Emergency Operations Procedures** – A Disaster and Emergency Operation plan has been created to provide guidance on how to respond in the event of a natural disaster or emergency situation. Please refer to section 7.1 of the Standard Operating Procedures guide. **Under the Freedom of Information Act, specific details related to deployment, mobilization, and tactical operations of Animal Services in response to emergencies cannot be disclosed.**
- **Mandated Reporting Requirements (Child or Elder)** – Rules for handling cases of potential abuse and/or neglect have been outlined in the Standard Operating Procedures guide. Officers have a duty to report any safety concerns to the

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appropriate authorities. Please refer to section 5.17 of the Standard Operating Procedures.

FINDING 2- TRAINING PROCEDURES FOR ANIMAL CONTROL OFFICERS NEED IMPROVEMENT

Objective: Obtain and review records and schedules of training.

Criteria: General Accounting Office (GAO) Standards for Internal Control in the Federal Government, page 31, states: “Train - Enable individuals to develop competencies appropriate for key roles, reinforce standards of conduct, and tailor training based on the needs of the role.”⁶

Condition: Officers attend internal and external training designed to help ensure they are prepared to perform their jobs. During our audit, we examined the employee files for all 15 officers to verify their training. Our examination disclosed the following:

- The files did not always contain copies of training Certificates of Completion for internal testing at the Animal Control Academy.
- The files did not always contain documentation of testing conducted and results achieved for internal training.
- Although some external training has occurred, some officers have not attended key training (e.g., training offered by the National Animal Care and Control Association (NACA), The Humane Society of United States (HSUS), and National Animal Cruelty Investigation School (NACIS)).

Cause: Animal Enforcement Officers may not have attended external training because of limited resources or departmental funding.

Consequence: When officers are not trained on current industry standards it increases the likelihood of injury to the officers, animals, and citizens while out in the field.

Recommendation: We recommend that Animal Enforcement management implement procedures to help ensure:

- All training records are retained in each officer’s file.
- Documentation of required training is completed.

Management Response: *Ten hours of annual training has been mandated for all staff to ensure competency and maintain certification requirements. Additionally, Standard Operating Procedures have been reviewed, and acknowledgment letters are signed*

⁶ US Government Accountability Office, Standards for Internal Control in the Federal Government (Green Book, September 2014, GAO-14-704G), page 31

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during morning roll call. A copy of all training certificates and acknowledgment letters are placed in the employees' files. .

FINDING 3- SOME OFFICERS HAVE NOT COMPLETED TRAINING FOR CHEMICAL IMMOBILIZATION

Objective: Obtain and review records and schedules of training.

Criteria: According to the NACA Guidelines:

- Animal care and control personnel should receive appropriate initial training in chemical immobilization as well continuing training to maintain competency and certification requirements.
- A written protocol should be maintained by agencies utilizing chemical capture.
- The protocol should include, but not be limited to, the following components: drug and drug administering equipment; animal handling and post capture care; anesthetic monitoring; human health and safety.
- The agency should have a plan or policy in place requiring regularly scheduled maintenance of the tranquilizing equipment.
- Capture through the use of chemical immobilization should involve consultation with a veterinarian whenever possible.

Additionally, the American Humane – Operational Guide for Animal Care and Control Agencies: Chemical Capture states:

- “Those involved in chemical capture successfully complete at least an eight-hour certification class.
- Maintain careful documentation of all training.
- Agencies establish a written training and qualifying protocol that requires a careful paper trail of compliance.”

Condition: During the audit, we examined the employee files for all 15 officers to verify training regarding the use of chemical immobilization and the maintenance of tranquilizing equipment. We found that training records do not exist for some officers and some officers are not certified to ensure proper administration of the chemical and proper handling of the tranquilizing equipment used to administer the chemical.

Cause: Animal Enforcement officers may not attend chemical immobilization training because of limited resources.

Consequence: When officers are not adequately trained regarding chemical immobilization, it increases the risk of injury to the officers, animals, and citizens. In addition, well documented immobilization records reduce the risk of substance abuse and theft of the immobilization substance.

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Recommendation: We recommend that Animal Enforcement management:

- Implement procedures to help ensure Animal Enforcement staff are properly trained and continue this training to maintain competency and certification requirements. In addition, ensure proper documentation is included in the files for all chemical immobilization training.
- Develop and implement written policies and procedures regarding the administration of chemical and tranquilizing equipment.
- Establish policies and controls over the release of darts provided by the veterinarian at the shelter.
- Implement procedures to help ensure officers remain certified in the use of chemicals.
- Implement procedures to help ensure proper documentation is included in the files for all actions performed pertaining to the chemical immobilization of an animal.

Management Response: *Each Animal Enforcement Officer has completed the Chemical Immobilization training, conducted by Animal Control Training Services. Procedures were updated to ensure department capture methods, and all chemical immobilization actions are properly documented.*

FINDING 4- RECORDS ARE NOT MAINTAINED FOR DANGEROUS ANIMAL REGISTRATION

Objective: Review the process for record maintenance to identify controls and process improvements.

Criteria: The County's Chapter 5-Animals Ordinance, Section 5-10 (d) "Dangerous and vicious animals"⁷ and Section 5-12 "Certificate of Registration."⁸

Condition: During the audit, we attempted to verify the County's processing, handling and follow-up for animals declared dangerous. We requested a listing of dangerous animals and were told that Animal Enforcement did not maintain a record of dangerous animals registered with the County. We also noted the following:

- Animal Enforcement had two open dangerous animal cases on file, however it is unknown if there were more dangerous animal cases because Animal Enforcement did not keep records of dangerous animal cases.
- One of the two dangerous animal cases did not contain documentation to support the issuance of the initial certificate of registration and subsequent certificates for each year.

⁷ DeKalb County, GA Code of Ordinances Chapter 5 – Animals Section 5-10. – Dangerous and vicious animals.

⁸ DeKalb County, GA Code of Ordinances Chapter 5 – Animals Section 5-12. – Certificate of Registration

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- A copy of the insurance policy was not in the case files for one out of the two dangerous animal cases.
- One of the two dangerous animal cases reviewed did not have proof that the animal's pen met size, security, and shelter requirements as defined in the County's Ordinance Chapter 5 – Animals.
- One of the two cases reviewed, did not have a certificate of registration for each subsequent year the owner kept the classified dangerous animal.

Cause: There is not a process for recording and tracking dangerous animal cases.

Consequence: The registration and confinement requirements imposed on dangerous animal owners is to help ensure public safety. When dangerous animals are not registered and tracked, they pose a threat to humans and other animals.

Recommendation: We recommend that Animal Enforcement management:

- Implement procedures to help ensure a log is maintained to record and track dangerous animal cases.
- Create a checklist to ensure case files are complete with all the documents required for registering a dangerous animal.
- Determine if the System has the functionality to track and store dangerous animal documents. If not, invest in a software system that can track enforcement cases, such as dangerous animal cases.

Management Response: *The prior administration was not familiar with using the PetPoint system to search for and obtain records on animal designated as "Dangerous". Procedures for handling "Dangerous Animal" cases have been implemented and are maintain by administrative personnel to ensure all cases are being properly documented.*

FINDING 5- PETPOINT SYSTEM WAS NOT ALWAYS UPDATED WITH THE COURT DISPOSITIONS FOR ANIMAL INCIDENTS

Objective: Review the process over citations and identify controls and process improvements.

Criteria: Per the GAO Standards for Internal Control in the Federal Government, principle 10.03 "Accurate and timely recording of transactions" page 48, "Transactions are promptly recorded to maintain their relevance and value to management in controlling operations and making decisions."⁹

⁹ US Government Accountability Office, Standards for Internal Control in the Federal Government (Green Book, September 2014, GAO-14-704G), page 48

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Condition: During the audit, we examined a sample of 90 citations to verify court disposition. We found that the correct court disposition is not always updated in the System and noted the following:

- 30 out of 90 (33%) citations had a status of "Awaiting Court Date" in the System while these citations had been dispositioned by the court.
- 47 out of 90 (52%) court dispositions noted in the System did not agree with the disposition in the court system.

Cause: Animal Enforcement SOP's do not address the responsibility of updating the System with the court's disposition for animal related citations.

Consequence: When the System is not updated to reflect accurate disposition of prior citations, it increases the risk of improperly handling an animal complaint, especially if the animal owner has been convicted previously for a similar violation.

Recommendation: We recommend that Animal Enforcement management implement procedures to help ensure the System is updated and kept current with information regarding case disposition and follow-up.

Management Response: *Protocol for updating dispositions of cases has been implemented. Animal Enforcement management will perform a monthly inspection of court citations ensuring they have been closed properly entered into PetPoint*

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APPENDIX

Appendix I – Purpose, Scope and Methodology

Purpose

The purpose of the engagement was to:

- Determine whether Public Safety Animal Services and Enforcement responded to and addressed deficiencies identified in the Finance-Internal Audit's August 2017 audit report.
- Examine Animal Enforcement's processes to identify opportunities for improvement.
- Identify opportunities to strengthen the effectiveness and efficiency of animal enforcement processes.

Scope and Methodology

The scope of this engagement was to examine documentation pertaining to the Animal Enforcement Division's processes for compliance with the County's Animal ordinance from August 15, 2017 to October 31, 2018.

The methodology included but was not limited to the following:

- Reviewed County's ordinance or administrative procedures for procedures and policies on Animal Enforcement.
- Researched Georgia State laws applicable to Animal Enforcement.
- Interviewed Animal Enforcement management to obtain an understanding of the processes for enforcement of County's ordinance.
- Examined supporting documentation to assess compliance with County's ordinance.
- Examined controls over the effectiveness and efficiency of enforcement procedures.
- Interviewed appropriate personnel and external parties.
- Reviewed other applicable documentation.

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Appendix II – Definitions

The American Humane – an organization founded in 1877, committed to ensuring the safety, welfare and well-being of animals.

Animal – Every living vertebrate except a human being as outlined in the Ordinance, Chapter 5 – Animals.

Animal Control Officer – Any person authorized by the governing authority or by law to enforce the provisions of Ordinance Chapter - 5 Animals. This position is referred to as the Animal Enforcement Officer in the Ordinance Chapter - 5 Animals.

Chemical Immobilization – “Achieved using drugs, which have a range of intended effects, from those which produce a widespread muscular paralysis while the animal is fully conscious, to those which produce unconsciousness with anesthesia (lack of sensation, e.g. of pain)”.¹⁰

Citation – A document stating the charge against the violator and requiring an appearance before a judge on a specified date, subject to punishment for failure to appear.

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

Dangerous animal – Any animal that, according to the records of an appropriate authority:

- (1) Causes a substantial puncture of a person’s skin by teeth without causing serious injury, provided, however, that a nip, scratch, or abrasion shall not be sufficient to classify an animal as dangerous;
- (2) Aggressively attacks in a manner that causes a person to reasonably believe that the animal poses an imminent threat of serious injury to such person or another person although no such injury occurs; provided, however, that the acts of barking, growling, or showing of teeth by an animal shall not be sufficient to classify an animal as dangerous; or
- (3) While off the owner’s property, kills a pet animal; provided that no animal shall be classified as dangerous when the death of such pet animal is caused by a dog that is working or training as a hunting dog, herding dog, or predator control dog.¹¹

Dart – A type of puncture device used to administer a control substance in order to chemically immobilize an animal.

¹⁰ <https://wildtrack.org/learn-more/the-welfare-impacts-of-immobilization/>

¹¹ DeKalb County, GA Code of Ordinances Chapter 5 – Animals Section 5-1. - Definitions

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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.

National Animal Care and Control Association – A non-profit organization that is committed to setting the standard of professionalism in animal welfare and public safety through training, networking, and advocacy.

Georgia Open Records Act – “A series of laws guaranteeing the public access to public records of government bodies.”¹²

Pen – A padlocked, fenced area within a perimeter fenced area that has secure sides that are buried two (2) feet into the ground or sunken in concrete and a secure top.

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

Quarantine Period – A length of time in which an animal that has bitten a human or another domestic animal must undergo a mandatory 10-day quarantine period; or an animal that has bitten a wild animal or that has received a suspected bite wound of unknown origin must undergo a six-month rabies quarantine.

¹² <https://www.nfoic.org/coalitions/state-foi-resources/georgia-foia-laws>

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PROJECT TEAM

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07/08/2020

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STATEMENT OF ACCORDANCE

Statement of Accordance

The mission of DeKalb County is to make the priorities of the citizens of DeKalb County; the priorities of County government - by achieving a safer DeKalb, building stronger neighborhoods, creating a fiscally accountable and more efficient county government and uniting the citizens of DeKalb County.

The mission of the Office of Independent Internal Audit is to provide independent, objective, insightful, nonpartisan assessment of the stewardship or performance of policies, programs and operations in promoting efficiency, effectiveness and integrity in DeKalb County.

This performance audit was prepared pursuant to DeKalb County, Georgia-Code Ordinances/Organization Act Section 10A-Independent Internal Audit. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This report is intended for the use of the agency to which it was disseminated and may contain information that is exempt from disclosure under applicable law. Do not release without prior coordination with the Office of Independent Internal Audit.

Please address inquiries regarding this report to the Office of Independent Internal Audit at 404-371-2765.