Audit of Animal Services

The animal shelter has a high live release rate; however, understaffing has impacted the animal shelter's ability to document all care activities adequately, impacting staff accountability. Similarly, the City's veterinary services contractor seems to respond to requests for medical services timely; however, contract management could be improved. Completed euthanasia procedures are humane but could be better documented. Training programs should be formalized and formally documented.

Expectations for officers in the field should be formalized. While Priority 1 calls appear to be responded to quicker, call-entering practices may delay the communication of requests for service to officers. Officer vehicles are appropriate for carrying animals and can be tracked.

Access to the animal management system is generally appropriate though access to the shelter facility is extensive; formal criteria for granting access should be developed to ensure consistency. Fees are outdated; clearer discount program guidelines would help to ensure consistency.

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Audit at a Glance

Why we did this Audit:

Animal services is primarily responsible for minimizing the spread of rabies in a community and so is a critical public safety function. On average, the City's animal shelter can house about 280 animals daily. This audit project was included on the City's fiscal year 2024-25 Audit Plan as approved by the City Council.

What we Recommend:

Recommendation 1
Assess staffing and organization structure.

Recommendations 2, 5
Track critical care tasks.

Recommendations 3, 4, 6, 7, 13, 14, 15, 17, 18, 20, 21, 23, 24, 30, 31
Implement, update, and align several SOPs for animal care, placing strays in homes, euthanasia, and officer expectations.

Recommendations 8 & 9
Improve veterinary services contract management.

Recommendations 10, 12, 22, 32, 33, 34
Improve communication with the public and fee management.

Recommendations 11 & 16
Consider new programs.

Recommendations 19
Formalize training tracking.

Recommendations 25, 26, 27, 28, 29
Formalize asset access criteria and improve facility management.

What we Found:

In general, the goal of Animal Services in a community is to minimize the spread of rabies by reducing stray animal populations. This audit generally evaluated the effectiveness and compliance of Animal Services animal care activities, officer response, and asset management, as well as the accuracy and appropriateness of fees. Our findings are summarized below:

Animal Care Activities. While the shelter has a high live release rate, understaffing and the lack of an easy activity-tracking system have hindered accountability; documentation of all care activities could be improved. Still adopted care practices appear humane and comply with state requirements.

Management over the veterinary services contract could be improved to ensure the City only pays for what it receives; veterinary services appear to be provided timely.

Officer Response. While Priority 1 calls appear to be responded to quicker, call response practices may delay communication of calls to officers. Expectations for officers in the field should be formalized. Officer safety practices are generally appropriate but could be formalized.

Asset Management. Formal guidance on who can access Animal Services assets, including the animal management system, the shelter facility, and officer vehicles, has not been developed. While access to the animal management system is generally appropriate, access to the shelter facility is extensive and management of vehicles could be improved.
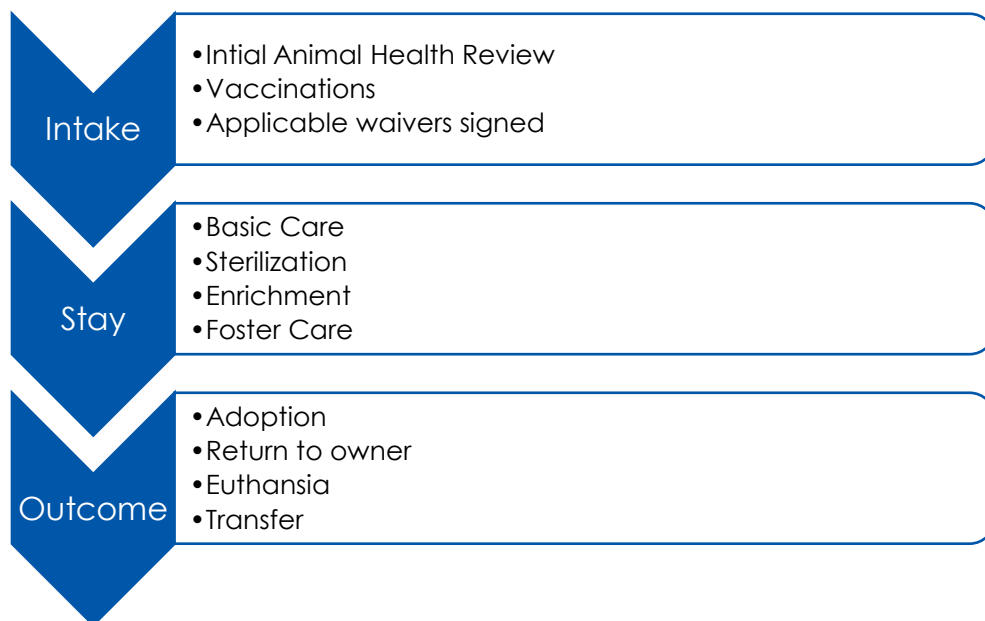
Fees Accuracy & Appropriateness. Animal Services fees are outdated and are not always charged consistently. While discount programs are appropriate authorization should be better documented to ensure the economical use of limited resources.

Audit report translations may be requested by emailing InternalAudit@CityofDenton.com.

Detailed Findings & Analysis

The State of Texas requires that municipalities ensure rabies is controlled within their area. In general, rabies is controlled preventively by reducing the number of stray animals within a community and reactively by responding to calls about dangerous animals. In the City of Denton, the Animal Services Department is primarily responsible for controlling rabies per ordinance.

To do this, the Animal Services Department operates the Linda McNatt Animal Shelter, which houses stray animals with the goal of placing them with an owner. The City's shelter can currently house over 280 animals daily. In general, an animal's stay at the shelter is outlined in Figure 1.

Figure 1: Animal Shelter Stays

Intake
- Intial Animal Health Review
- Vaccinations
- Applicable waivers signed

Stay
- Basic Care
- Sterilization
- Enrichment
- Foster Care

Outcome
- Adoption
- Return to owner
- Euthansia
- Transfer

The Department is also responsible for enforcing animal-related regulations throughout the City including issuing citations, conducting investigations, and seizing animals. Additionally, the Department should provide animal and pet owner education to the public to help ensure appropriate care is provided to animals and help reduce the stray domestic animal population.

This audit generally evaluated the effectiveness and compliance of Animal Services animal care activities, officer response, and asset management as well as the accuracy and appropriateness of fees.

Limited Staffing Reduces Ability to Ensure Consistent Care; Improved Dangerous Drug Control and Updates to Current Medical Care Contract Could Improve Process

The Animal Services Department is responsible for ensuring that animals housed in the shelter receive adequate care. In general, shelter staff's daily activities include feeding housed animals, cleaning enclosures, and monitoring animals for any behavioral or medical concerns.

Best practices generally suggest that animals within shelters should receive a minimum of 15 minutes of care each day (i.e., nine minutes for cleaning and six minutes for feeding).[1] Minimum care includes one feeding and one cleaning and staffing calculations are based on community population and the average number of animals housed. Additionally, to ensure minimum care is consistently provided and a shelter does not inadvertently exceed housing capacity a maximum population should be determined.[2]

Best practices also suggest that animals should be fed twice a day, cats should have the opportunity to graze, and young animals should be fed more frequently or be allowed to graze. Food should be stored securely.

The Association of Shelter Veterinarians', or ASV, Guidelines for Standards of Care in Animal Shelters states that all incoming animals should receive a physical assessment which includes the administration of basic vaccinations and parasite care and checking for identification including microchips. ASV also suggests that vaccination boosters are provided to animals timely.[3] All staff performing medical assessments should be medical professionals or be adequately trained and animals that remain in a shelter for over a month should receive monthly health checks.

Texas State law requires that animals have access to food and water. Additionally, all dangerous drugs used to provide medical care should be secured and controlled per State regulations.[4]

Finally, best practices suggest that organization-specific training should be provided to staff to ensure they are aware of expectations and consistent practices are maintained.

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[1] The American Society for the Prevention of Cruelty to Animals, or the ASPCA, and the National Animal Care & Control Association, or NACA, use 15 minutes as the basis for calculating minimum shelter staffing levels.

[2] ASPCA, NACA, ASV, and The Humane Society of the United States has determined that knowing a shelter's housing capacity helps organizations to proactively manage shelter's population and ensure capacity for care.

[3] ASV states that animals under 20 weeks should receive a booster of DAPP/FVRCP should be given every 2-4weeks depending on housed location. Adult animals should receive boosters every 2-4 weeks in the shelter

[4] Per Texas Health & Safety Code Chapter 483, Subchapter A, Section 483.001 a dangerous drug is defined as a device or drug that is unsafe for self-medication and not included in the Substances Act, Chapter 481 schedules.

What We Found

- Generally, the Animal Services Department does not have enough dedicated animal shelter staff per best practices.
  - o Based on the use of minimum staffing calculators created by NACA and the ASPCA, Denton's shelter should have about eight dedicated animal care technicians onsite.
  - o As of September 2024, the Department had a total of 26.5 budgeted employees 11.5 of which were dedicated to animal care within the shelter, though they were also responsible for assisting front desk staff with the adoption process.
  - o To help ensure animals receive minimal care the Department relies on positions whose main job responsibilities are not focused on animal care activities including managers and Animal Services Officers.
  - o Volunteers also provide roughly 400 hours of assistance per month; however, they are largely focused on dog-walking and other enrichment activities like giving toys. Staff may also provide enrichment for animals if time is available.
  - o The Animal Services Department has not established a formal maximum capacity level for the shelter. Capacity fluctuates and is reportedly based on resources at the current moment, but written guidance on determining if the shelter is at capacity has not been created.

- Animals are fed daily and have access to fresh water; however, verification of completed daily tasks and behavioral tracking is limited and staff practices do not always align with the related standard operating procedures.
  - o The Department has established standard operating procedures for feeding, weight management, and cleaning. While behavioral notes are sometimes documented, staff are not formally required to record behavioral observations or provided written guidance on what behavior should be documented.
  - o Observed feeding practices did not always align with the related standard operating procedures such as providing wet food to adult cats. Additionally, the cleaning standard operating procedure states that the disinfectant is to remain for ten minutes in dog kennels; however, a five-minute wait time was practiced as recommended by the product's usage instructions.

- A supplement is provided to all cats, but there are no written dosage instructions.

- During Fiscal Year 2023 and 2024, staff was unable to formally track or verify which animals had been fed and what kennels had been cleaned throughout the day. During the beginning of Fiscal Year 2025, staff has been developing a digital system to track daily care activities.

- Of a statistical sample of 100 adopted animals reviewed, 21 records showed some notes from staff regarding the animals' behavior. Of the 79 who did not have behavioral notes the average length of stay was 30 days.

- The shelter has established a standard operating procedure for intake that requires all basic vaccinations and parasite care for cats and dogs as suggested by the ASV. However, it's unclear if all vaccinations are provided consistently based on available documentation. There are no written instructions or requirements regarding intake exams for other animal types.

  - Based on a review of a statistical sample of 99 animals taken into the shelter,[5] seven did not have a documented intake exam. Two of the seven had notes indicating that the animal's behavior hindered an initial review yet there was no further notation to show staff came back to complete an intake exam later.

  - As shown in Tables 1 and 2, many of the required intake vaccines and medicines were not documented as completed for the 99 animals reviewed. Further, many received required boosters however they appeared to be less consistent.

Table 1: Percent of Required Cat Vaccines/Medicines Documented

Required Vaccinations	Kitten (31 Total)	Cat (22 Total)
FVRCP or HCPCH	87%	77%
Dewormer (Pyrantel)	55%	82%
Dewormer (Panacur)	90%	N/A
Flea/Tick Prevention	94%	82%
Ponazuril	3%	N/A
Boosters	61%	75%

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[5] An additional intake of a rat was included in the 100 animals however since an intake nor vaccinations are required this animal was excluded.

Table 2: Percent of Required Dog Vaccines/Medicines Documented

Required Vaccinations	Puppy (11 Total)	Dog (35 Total)
DAPPv	100%	94%
Dewormer (Pyrantel)	36%	97%
Dewormer (Panacur)	73%	N/A
Heartworm Prevention	100%	91%
Flea/Tick Prevention	100%	7%
Bordatella	100%	91%
Ponazuril	0%	N/A
Boosters	50%	56%

- Animals in the Department's care for over 30 days do not receive a formal monthly health check.

  o Of a statistical sample of 100 adopted animals, 34 had a shelter stay longer than 30 days; however, none had a documented monthly health check. While monthly health checks are recommended by best practices, they are not currently required by the Department.

- The City of Denton has established a contract for veterinary medical services; however, the contract may need revisions as some key performance expectations cannot be verified.

  o Contracted veterinary staff appear to be responding to requests for medical checks from City staff timely. Specifically, most requests appear to be responded to within one day of submission.

  o The contract was most recently updated in 2023 to increase the number of staff supplied to help ensure contracted medical staff complete all required intakes. Of the 82 animal records that showed intakes with an identifiable name, only 41 were completed by contracted medical staff indicating this expectation is not being met.

  o Costs for "specialty surgeries" have been added to invoices per a verbal agreement from a former staff member and the lead veterinarian. It is not clear why these surgeries are not covered by the City's written contract.

  o The Department relies on the contractor to track the services and time provided and does not have a process to independently verify the accuracy of invoices.

- Practices and procedures around non-euthanasia-related drugs could be improved with formalized inventory tracking and consistent practices.

  o Non-euthanasia drugs are purchased by the City but are managed by contracted veterinary staff. Contracted staff complete informal inventory checks, but City staff do not verify this information, such as

      monitoring drug usage or verifying current stock amounts. This increases the risk that drugs the City pays for could be lost, stolen, or misused.

          o Some of these drugs maintained are considered dangerous drugs and the storage procedure increases the risk of loss.

- There is no formal onboarding training for shelter staff, nor organization-specific training on processes. However, staff are provided updates and training on procedures or practices via periodic staff meetings.

Why It Matters

Animal Services appears to be providing needed minimal care for animals under the City's control. However, the limited number of dedicated shelter staff members and lack of written guidance on assessing capacity level increases the risk of the City accepting more animals than it can manage humanely. Additionally, the dependency on managers and field officers impacts other service areas.

The Department has developed a standard operating procedure that requires administration of all the initial intake vaccines recommend by best practices, but the documentation of intake vaccines administration is inconsistent, limiting the ability to verify if animals receive consistent care. Additionally, there is no intake standard operating procedure or instructions for animals that are not dogs or cats and care, which could cause inconsistent or limited medical care for these other animals.

As recommended by best practices, staff provide booster vaccinations to some animals in the City's care, however, these are not consistently given increasing the risk of animals falling ill. Additionally, there is no indication that animals who have been in the City's care for over 30 days receive formal monthly health checks, which increases the risks of staff missing a change in the animal's health status.

Although multiple standard operating procedures regarding animal care, intake, and cleaning practices exist, staff did not always follow these procedures during observations. The lack of onboarding training or other formalized training may have helped create inconsistent practices. For these reasons, establishing formal and active supervision of staff activities may be beneficial. Additionally, completed daily care tasks were not tracked, increasing the risk of an animal not being fed or a kennel not being cleaned. In general, understaffing and the lack of a formal activity monitoring system have limited accountability within the shelter. Staff have begun exploring digital tracking methods for daily tasks to help alleviate these risks.

The City has contracted with a veterinary service to help ensure animals receive medical care, however, a lack of formal service verification methods increases the risk of the City paying for services it did not receive or paying an inappropriate amount. Additionally, the current agreement expects contracted staff to perform all intake exams. However, at this time City staff appear to be conducting roughly the same number of intake exams as contracted staff, which calls into question the appropriateness of the additional contract costs. Based on best practices, while those performing intakes should be appropriately trained, it is not required that they be licensed medical staff.

Finally, a lack of formal non-euthanasia drug inventory and storage practices limits the City's ability to verify that orders are appropriate and ensure these drugs are safe from loss, theft, and misuse.

Recommendations:

1. Assess current staffing organization and structure to ensure minimum care standards are maintained without impacting other operations. It is likely additional staff is needed.

   Animal Services Comments: Two additional Animal Care Technicians were added to the department for FY25 during the Budget Process. Those positions were posted in October and filled in December. The department has had to work through additional vacancies due to turnover, separations, and promotions; however, the department anticipates being fully staffed by the end of January 2025. Any additional identified staffing needs will be presented as part of the FY26 Budget process. Additionally, the department was recently reorganized to center positions around goals versus functions and align positions with renewed expectations for service and lifesaving.

2. Develop a process for ensuring all required vaccinations and medicines are administered to animals during intake. Require follow-up intake exams for animals that could not complete their initial exam.

   Animal Services Comments: RSVP staff were tasked with ensuring completion of exams for animals who did not receive them on intake and for conducting booster follow ups. Over the last four months, there have been a number of changes in the RSVP staffing causing inconsistencies in the work. The Intake Supervisor will be tasked with ensuring the new RSVP staff complete required tasks and develop a process for ensuring required intake exams are complete.

3. Implement written guidance regarding intake and care of non-dog and cat animals and ensure staff are trained on the procedures.

Animal Services Comments: Management will develop a formal SOP to offer guidance to staff on the appropriate steps to intake and care for non-traditional shelter animals.

4. Formalize a method for tracking an animal's length of stay and implement monthly health checks for those that remain in the Department's care for over 30 days. Monthly health checks should at least include re-checking the animal's weight and providing vaccine boosters.

   Animal Services Comments: Animals receive daily health and welfare checks ensuring that they:
   - *Are eating food and drinking water.*
   - *Are not exhibiting any concerning behavior or signs of distress*
   - *Are not exhibiting symptoms of URI or other illness.*
   - *Are not visibly injured.*
   - *Are not exhibiting any signs of being in pain.*
   - *Are bright, alert, and responsive.*

   These checks are sampled and audited daily by supervisors. Any animal that does not meet all of the above criteria is addressed appropriately, including being given clinical care.

   Additionally, the Outcome Supervisor will work with RSVP staff to develop a process for ensuring required monthly rechecks and boosters are completed and documented.

5. Formalize a method to track and verify daily care task completion, including which animals have been fed and what kennels have been cleaned.

   Animal Services Comments: Animal Services has implemented a Daily Health and Wellness Monitoring System to ensure that every animal, every day, has been given appropriate care including medication, feeding, enrichment, etc. Training has been conducted with staff members and the system is supporting proactive identification and addressing of issues.

6. Align feeding and cleaning practices and relevant standard operating procedures, including feeding the correct type and amount of food, removing paper bowls from canine kennels as soon as they are emptied, and clarifying how long disinfectant should remain on kennels before removal. Consider implementing twice-a-day feeding as recommended by best practices. If daily supplements are continued to be offered to cats, ensure dosage guidance is provided to staff.

Animal Services Comments: Staff will update SOPs to reflect the current established practices for feeding, cleaning, and dosage of supplementals. There is no supporting information in the audit for twice daily feedings. At the November 13, 2024, ASAC meeting, the idea of twice daily feedings was discussed, and the board veterinary member stated clearly that it was not necessary or otherwise beneficial.

7. Implement a standard operating procedure regarding behavior monitoring that requires staff to record observations in the shelter's animal management system.

    Animal Services Comments: Staff are currently required to provide notes on concerning behavior and positive behavior daily in the Daily Health and Welfare Monitoring System for supervisors to address and document in the shelter management system. Staff have received training on this process. A formal SOP will be established.

8. Work with the Purchasing Division to ensure the veterinary care contract includes any extra, appropriate costs that may not be covered in the current agreement. Implement a method to verify contractor billing independently to ensure the City is only paying for services received.

    Animal Services Comments: Staff is currently working with the Purchasing Department and the contractor to update the agreement to ensure pricing, services, and invoicing are accurately reflected.

9. Work with the veterinary care contractor to establish inventory management procedures over non-euthanasia drugs to reduce the risk of loss, theft, or misuse. If possible, an active inventory list should be maintained, and drugs should be periodically inventoried by City staff to verify accuracy.

    Animal Services Comments: Non-euthanasia drugs are managed by veterinary staff who conduct periodic informal inventory. Staff is currently exploring options for more formalized and efficient inventory tracking of non-euthanasia drugs.

Live Release Rate is High; Improved Outreach and Documentation of Animal Behavior could Improve Adopter Experiences

A part of an animal shelters' goal to decrease the number of stray animals is to place found animals in homes either by returning them to their owner or through adoption. To effectively place animals with owners, shelters should regularly engage with the public about shelter services and animal ownership education, including providing information on animal behavior and the benefits of sterilization.

To ensure as many animals are returned to their owner as possible, many shelters place newly received animals under a hold period during which the animal is not available for adoption. Further, best practices recommend that shelters do the following to increase the chances that an animal is returned:

➢ Check for all types of identification, including microchips,[6] and review local online platforms for lost animal reports;

➢ Use as many methods to communicate that an animal has been found as possible, including social media posts, and track communication attempts; and

➢ Clearly communicate reclaim instructions online and provide ample opportunity for people to visit the shelter to search for lost pets.

Once the hold period is over, animals become the shelter's property and are adoptable. When adopting animals, new owners should be required to sign an agreement accepting ownership of the animal and waiving liability against the shelter. In addition, shelters should provide accurate medical and behavioral information to ensure adopters are fully informed. Those surrendering animals should be required to sign a form that confirms they are the current owner and are relinquishing ownership of the animal to the shelter. Finally, Texas state law prohibits a shelter from releasing a dog or cat for adoption unless it has been sterilized and requires all dogs and cats four months or older to be vaccinated against rabies.

While placement with an owner is often the appropriate strategy to help reduce stray animal populations, best practice recognize that this is not always the most suitable method. In particular, community cats, or those born in the wild or that have lived outdoors for extended periods, are likely to be unsocialized and unadoptable. For this reason, a trap-neuter-return, or TNR, program is generally recommended to keep this population of animals manageable. These programs require that animal shelter staff be regularly trained to mitigate community cat nuisances and that the public be educated about the reasons for this program.

The effectiveness of a shelter in placing animals in a home or appropriately back in the community is generally measured through the Live Release Rate which is calculated as shown in Equation 1.

Equation 1: Live Release Rate

$$Live\ Release\ Rate = \frac{Live\ Outcomes}{(Live\ Intakes - Owner\ Requested\ Euthanasia)}$$

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[6] Texas State law requires that shelters scan an animal for a microchip as soon as practicable.

What We Found

- For Fiscal Years 2023 and 2024, the City of Denton's Animal Shelter had a Live Release Rate of 83 percent. When broken down by type, this number is similar for dogs at 83 percent and slightly higher for cats at 87 percent.

- Denton's animal shelter does not have a formal education or outreach program. Some informal services exist, but communication about these is limited. Increased public access to the shelter could further encourage animal placements with owners.

  o Based on responses received from 139 survey respondents,[7] about three-quarters rated the resources the shelter provides to pet owners positively; however, about a quarter rated Animal Services' community outreach and education programs negatively. Other survey service quality results are summarized in Figure 2.
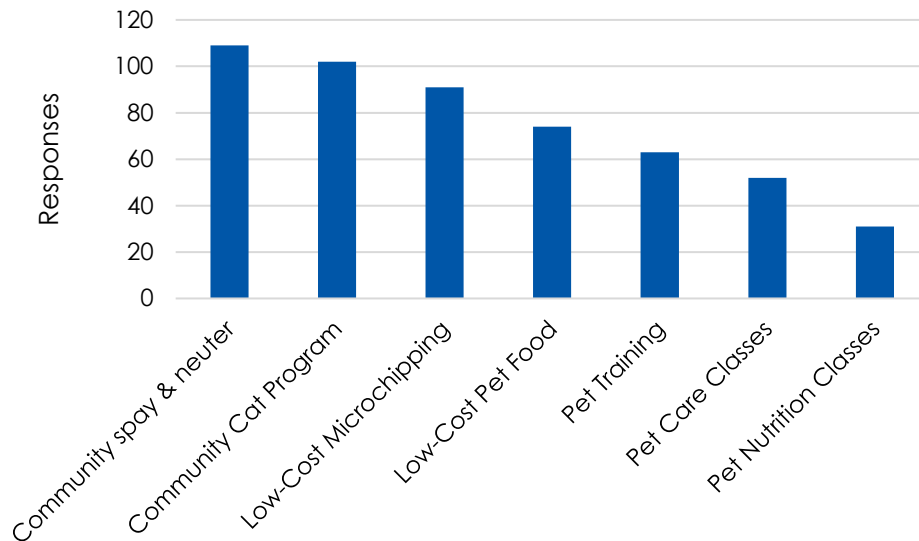
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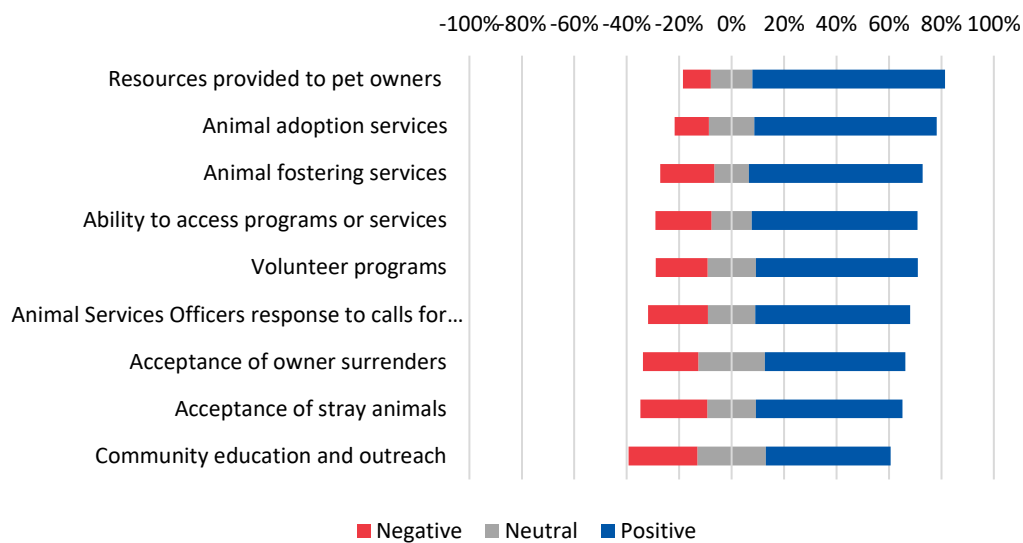
  o Responses to the community survey also indicated that residents believe access to low-cost sterilization and low-cost microchipping for animals are high priorities as shown in Figure 3.

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[7] Complete survey results are summarized in Appendix B.

Figure 3: Pet Care Program Priority

- o It should be noted that the shelter currently offers microchipping services to residents upon request; however, the Department is not currently authorized to charge a fee for this service. In addition, the shelter has performed sterilization services for some community members in need as part of an informal program.

- o The Denton Animal Shelter has developed a flyer that Animal Services Officers occasionally hand out in the field that directs people to reach out for help with sterilization services.

- o Finally, the City of Denton's animal shelter is currently open from 10 AM to 5 PM Monday, Tuesday, Thursday, Friday, and Saturday. The total public operating hours are low when compared with similar shelters in the Dallas-Fort Worth Metroplex. Additionally, these hours limit access to standard business times, which could impact some people's ability to physically search for lost animals or adopt new animals. Still, lost and adoptable animals are available for review on the City's website.

- Documentation for animals returned to their owners, including legally required information and communication records. could be improved.

  - o The City of Denton has established a 72-hour stray hold period. To reclaim an animal, City ordinance requires an owner to: (1) provide photo identification, (2) provide proof of current rabies vaccination, and (3) provide proof of sterilization, if it is at least the second time the animal was impounded. In addition, the City's website states that the individual must provide proof of ownership before the stray hold is complete.

o Documentation of who reclaimed an animal is typically maintained; however, only about half of reclaimed animals had documented proof rabies vaccination and ownership verifications as shown in Table 3. The Department has developed a standard operating procedure for processing an animal's return to its owner in the animal management system; however, it does not require most of these items to be documented.

Table 3: Summary of Return to Owner Documentation Review Results

Documentation	Percent of Animals with Doc.
Photo ID	99%
Rabies Vaccine	48%
Proof of Ownership	52%
Sterilization Proof	100%

o The Animal Services Department has implemented standard operating procedures that require all animals to be scanned for a microchip on intake. If a microchip is found, the standard operating procedure states the information should be recorded on a physical communication sheet and documented in the animal management system.

o Based on a review of 85 animals coded as "returned to owner" in the animal management system, only 32 had documented microchip scans. Of those, only 11 scans successfully found a microchip, and the communication sheets of only five of those could be found. Still, for some records without a documented scan there was evidence that an owner had been contacted, including a communication sheet, indicating that microchip scans are likely occurring without being documented.

o Upon intake to the shelter, pictures of stray animals are uploaded to the City's website. In addition, if a microchip is found, staff attempt to find the contact information associated with the microchip and reach out to that person during the 72-hour hold period. Staff are not formally instructed to search for the lost animal's owner on local websites or social media pages as suggested by best practices. It should be noted that, due to staffing constraints, these additional contact measures may not be possible at this time.

o In addition, Animal Services Officers are encouraged to return animals to their owners in the field, or without bringing them back to the shelter, if possible. A standard operating procedure detailing this procedure has been developed.

- Adoption regulations are generally fulfilled.

    o   Animal visitation waivers are used; however, there is no method to track if they are being completed consistently since there is no formal tracking of visitors into the shelter or verification of who is visiting animals.

    o   There is no requirement to disclose animal behavioral or medical information to adopters. New owners must complete an adoption agreement stating that they release the City from liability for the adopted animal. Based on a review of 100 adopted animals, ten did not have a signed adoption agreement and, while most adopters received medical information on their new animal, no adopter clearly received behavioral information.

    o   Based on a review of 99 adopted dogs and cats, five did not have a record of receiving a rabies vaccination. However, of those only one was over the age of 4 months, the maximum age permitted by law.

    o   The Animal Services Department generally ensures all adopted dogs and cats are sterilized as required by law. A review of 99 adopted cats and dogs and 78 foster care animals found only two cats that were not sterilized before adoption. Of those two, one had medical concerns noted in the animal's record that may explain the lack of sterilization.

- The owner surrender process could be enhanced with more consistent documentation including owner-completed behavioral forms.

    o   Roughly 77 percent of the 95 reviewed surrendered animals had a signed owner surrender form. This form verifies that the person surrendering the animal was the animal's current owner and is relinquishing ownership to the City. Of those 95 animals reviewed, only 26 had behavioral information forms, which provide information regarding the animal for staff or future adopters.

    o   In August 2024, the Department created an online process for surrendering an animal that includes providing animal behavioral information, which may allow owners to provide more detailed information.

    o   A review of 87 applicable animals found that only 50 had documentation of a microchip scan, limiting the ability to verify if ownership was checked by staff.

- Not all completed paperwork is consistently added into the animal management system. Rather some documentation can only be found in bulk PDFs within the Department's local network hindering their usefulness.

- The Department does not have a formal TNR program but has been releasing some community cats.

  o The City recently updated its Code of Ordinances to allow for the development of a community cat TNR program but has not established formal guidelines.

  o During Fiscal Year 2023 and 2024, 115 cats were returned to their previous location after being sterilized.

  o 73 percent of respondents to the resident survey indicated that they believed a community cat TNR program would help to promote pet care in the community further.

Why It Matters

A critical function of an animal shelter is to place stray animals into homes to help reduce pet populations, ultimately helping to minimize the spread of rabies and increase public safety. To do this effectively, it is critical that an animal shelter be able to reunite lost pets with their owners and encourage others to adopt new pets.

While the Department has generally complied with adoption regulations further improvements in documentation of completed activities and animal behavioral information could help verify the actions taken by staff and further help animals get adopted. Specifically, saving documents in bulk PDFs outside of the animals' records limits staff's ability to readily use obtained behavioral information and prohibits tracking of actions taken regarding an animal.

A successful TNR program could help reduce the overall shelter population and reduce animal stress as community cats would not have to be housed long-term. These animals can be returned to familiar terrain and continue to thrive.

Recommendations:

10. Enhance promotional efforts for the City's microchip program once appropriate fees have been authorized.

    Animal Services Comments*: The department cannot currently charge for microchipping services but has been offering them to the community free of charge since May 21, 2024. Staff plans to bring an updated schedule of fees to Council in Q2 of FY25. Once adopted, the department will promote the microchip program.*

11. Consider establishing an owner-requested sterilization program.

    Animal Services Comments*: More research into funding and logistics would be needed before implementing.*

12. Evaluate shelter operating hours to increase accessibility to the public, especially in the evening. Post information online on how to contact shelter staff to set appointments for lost animal searches or returns on days the shelter is not open to the public.

    Animal Services Comments: Current staffing levels prohibit expansion of services at this time; however, management is working to implement an expansion of hours as soon as feasibly possible. Staff has worked with Customer Service Department and Public Safety Communications to provide consistent and more accurate information and communication to the public during shelter non-operational hours. Staff will work with the City's webmaster to update the department website.

13. Update the Return to Owner Standard Operating Procedure to ensure that legally required verifications are documented in the animal management system.

    Animal Services Comments: Previously, staff would visually verify documentation but recording of verification was not mandatory. Staff will update Return to Owner SOP to require documented verification of necessary documents.

14. Formalize requirements for staff to obtain behavioral forms for owner-surrendered animals and save them to the animal's electronic record. Ensure all adoption and owner-surrendered agreements are completed and saved to the animals' electronic record. Formalize a method for tracking and saving animal visitation waivers.

    Animal Services Comments: In January 2024, staff implemented use of an electronic form to collect all information, including behavioral information, for owner-surrendered animals. It is current practice for staff to have customers complete the form. The department will create a formal SOP for this practice and include direction to save the collected information to the animal's record in the shelter management software.

    Currently, visitation waivers are bulk saved electronically on the department's network drive. At this time, staff is developing an electronic method for collecting and retaining visitation waivers. Once the process is complete, an SOP will be generated.

15. Ensure staff are completing microchip scans and recording the results consistently in the animal management system.

Animal Services Comments: *The updated Microchip Scanning and Contacting SOP requiring documentation of scans was implemented and reviewed with staff 9/25/24. The Intake Supervisor will conduct periodic reviews to ensure compliance with the SOP.*

16. Create formal guidelines for a community cat trap-neuter-return program including criteria for animals to be diverted to the program and education and outreach materials about the benefits of maintaining community cat colonies and how to deal with nuisance cats.

    Animal Services Comments: *This is an already identified need. Work is planned to begin FY25 Q2.*

Completed Euthanasia Appear Humane; Improvements to Documentation and Verification of Staff Training Is Needed

The State of Texas has some requirements and recommendations surrounding euthanasia:

> ➤ Sodium pentobarbital must be used for all dogs and cats and is approved for other animals;

> ➤ Administrators of the drug must have been trained within the past three years;[8] and

> ➤ An untrained person can assist but cannot administer any drugs. However, the State recommends that all those involved in the process be trained.

In addition, best practices recommend that euthanasia be performed with two staff members present; that animal identification be verified before beginning the procedure, including a microchip scan; that vital signs be verified before disposal; and that animal bodies be prohibited from contact with live animals.

Sodium pentobarbital is considered a controlled substance,[9] and all controlled substances must be obtained using a valid DEA license.[10] Any unopened supply of controlled substances must be securely locked, and access should be limited to supervisors, veterinarians, and trained euthanasia technicians. Organizations must maintain a detailed log recording the exact use of controlled substances.

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[8] Texas Law excludes veterinarians; new staff members have 120 days to complete training.
[9] Per Texas Health & Safety Code Subtitle C, Chapter 481, Subchapter A, a controlled substance, includes a drug, an adulterant, and a dilutant, listed in Schedules I through V or Penalty Group 1, 1-A, 1-B, 2, 2-A, 3, or 4.
[10] The Drug Enforcement Administration grants licenses via their Diversion Control Division to help ensure only appropriate individuals and organizations purchase and distribute controlled substances.

It is recommended, but not required, that the log include the drug name and strength, the date of use, animal ID, the amount used, the amount remaining in the bottle, and the initials of those who used it. As mentioned previously, the State requires that dangerous drugs be monitored and secured.

Per best practices, in some situations, like when handling a dangerous animal, shelter personnel may use a pre-euthanasia, sedation drug to assist in the process.

What We Found

- The Animal Services Department has established a euthanasia standard operating procedure that addresses all State regulatory requirements and some best practices.

  o Specifically, the standard operating procedure requires that two individuals perform the procedure and that both check for vital signs, that the animal be reweighed, that the reason for the euthanasia be recorded in the animal management system, that only full dosages of sodium pentobarbital be used, and that the amount of all drugs used be documented in the animal management system and the drug log.

  o However, some updates are needed to align with current practices. Specifically, the current Department system is not listed, and the stray hold time has not been updated since the ordinance change became effective in May 2024.

  o During the audit, the Department was developing a comprehensive updated euthanasia policy, which included decision-making criteria. A euthanasia policy has not been previously adopted.

- Documentation inconsistencies and deviations from the established guidance limit the ability to verify the appropriateness of completed euthanasia.

  o Review of euthanasia documentation within the Department's system for 95 completed procedures and onsite observations found that the current written guidance is not being consistently followed or documented as summarized in Table 4.

Table 4: Euthanasia Documentation Review Summary

Procedure Requirement	Percent Completed Appropriately
Authorizer Doc. In Animal Mgmt. System	58%
Two Staff Members Complete Procedure	42%
Reasoning Cleary Doc. In Animal Mgmt. System	13%
Full Dosage of Sodium Pentobarbital	97%
Microchip Scan Clearly Doc. In Animal Mgmt. System	6%
Weight Doc. In Animal Mgmt. System	42%
Kennel Cards on Body Bag	0%

- o It should be noted that video review of completed procedures from October 2024 found that staff often appear to be completing microchip scans and reweighing animals before injecting drugs, but these actions were not documented in the animal's record.

- o There is no comprehensive guidance on handling and documenting the euthanasia of injured wildlife limiting the ability to verify the appropriateness of twenty-three procedures.

- o One reviewed euthanasia showed behavioral notes from two different staff members dated after the recorded euthanasia date.

- Of the 47 stray animals euthanized before completion of the 72-hour hold period, 39 had appropriate documentation to verify the procedure was permitted per City ordinance. Of the eight that did not have appropriate documentation, four appeared to be neonatal animals that would have likely been appropriate.

  - o The remaining four failure to thrive and injured wildlife reasonings used in the Department's system did not have additional notations from staff to verify appropriateness.

- Staff appear to be verifying death before placing euthanized animals in body bags and the disposal method used by the Department appears to ensure other animals are not exposed to fatal drugs.

- Employees performing euthanasia are generally appropriately trained; documentation and tracking of State-required euthanasia training should be improved.

  - o Of the 19 employees who were documented as participating in a euthanasia procedure, training certificates for two staff members were not available. One of these individuals separated from City employment before being required to obtain the training. Individuals have 90 days to obtain certification and may assist with euthanasia during that time.

- o Further, one additional employee completed euthanasia procedures while their training certificate was expired between April 2023 and February 2024.

- Sodium pentobarbital, a controlled substance, is used for euthanasia and appears to be appropriately maintained; however, documentation consistency could be improved.

  - o The Department maintains a controlled substance log for sodium pentobarbital that contains all recommended details including the amount of drug used, date used, and balance remaining in bottle. Some corrections to this log were noted due to staff incorrectly tallying bottles.

  - o Of the 95 procedures reviewed, 87 showed the same reason for the euthanasia procedure as listed in the Department's system such as owner requested procedure or behavioral. Three procedures showed a date in the animal management system that was different than the drug logbook. Additionally, staff initials listed in the book did not always match who was listed in the system.

  - o Both unopened and open bottles of sodium pentobarbital are stored within locked safes with appropriately limited access.

  - o The Department was not able to produce a copy of its DEA license; however, it appears to be current based on recent inspection results and the ability to order controlled substances.

- The Department will occasionally use a pre-euthanasia sedation drug that is classified as a dangerous drug. A method for tracking this drug has been established but it is not consistently used.

  - o Of the 95 procedures reviewed, 16 showed a record of the sedation drug in the logbook, but the drug usage was not listed in the Department's system as required. This logbook also did not clearly track bottle levels.

  - o Both unopened and open bottles of the sedation drug are stored within locked safes with appropriately limited access.

Why It Matters

The Department appears to be using humane euthanasia methods and complies with the State requirement to use sodium pentobarbital. Still, staff should ensure all details of each euthanasia are accurately documented in the animal management system to improve accountability. Further, the euthanasia standard operating procedure should be updated to reflect current practices,

and guidance on euthanizing wildlife should be developed to ensure consistency.

Untrained staff members or those with expired euthanasia training should not be completing euthanasia as it violates State law and increases the risk of staff using incorrect techniques.

Additionally, the lack of inventory tracking for the pre-euthanasia, sedation drug limits the ability to track inventory, placing the drug at a higher risk of loss, theft, or misuse.

Recommendations:

17. Implement a standard operating procedure regarding Department's drug handling and control for sodium pentobarbital and the pre-euthanasia, sedation drug, including developing a process to compare the drug log to the animal management system for accuracy, and provide regular training. Ensure only trained staff are performing euthanasia procedures and maintain a record of training certificates. Locate and save a copy of the City's current DEA license in Department's records.

    Animal Services Comments: The department currently conducts periodic spot audits and the required bi-annual audit of the drug log to ensure accuracy; however, no formal procedure exists. Staff will develop a formal SOP for conducting controlled substance audits. Department will formalize training tracking and records retention to ensure department records are appropriately maintained.

18. Update the euthanasia standard operating procedure to include documentation requirements within the animal management system and staff expectations, including dosage instructions and required hold times.

    Animal Services Comments: The SOP at the time of the audit was last reviewed in 2021. Staff has since updated the SOP to reflect 2024 changes to the ordinance and new shelter management system.

Lack of Comprehensive and Updated Guidance Hinders Consistency of Field Operations

In the State of Texas, one of the primary functions of animal control functions is the prevention of rabies. Organizations designated as Local Rabies Control Authorities, or LRCAs, are responsible for taking and investigating bite reports and handling quarantined animals as described in Figure 5. The Animal Services Department has been designated as the LRCA in the City of Denton.

Figure 4: LRCA Required Activities & Documentation

Bite Reports
- Name & Address of Vicitim
- Name & Address of animal's owners
- Any Information that can help locate parties involved

Home Quaratine
- Permissible for animals current on rabies vacinnation and who were not in violation of ordinance at time of biteWritten and owner-signed notification of 10 day period
- Placard displayed on animal's cage
- Release after 10 days if no signs and current on rabies vaccinations

The State requires that those hired to perform these activities, typically animal control officers, complete an approved basic training program within one year of hire. Further, these individuals must complete 30 hours of continuing education every three years. Further, best practices suggest the following for comprehensive animal control officer training:

➤ Provide extensive training that includes more than in-field training;

➤ Provide Department-specific expectations and policies of the organization; and

➤ Maintain training records.

In addition to the LRCA requirements, the Department is also responsible for responding to calls for service such as animal cruelty investigations, deceased animal pick-ups, and issuance of citations. Those who are certified as officers are permitted to issue citations for animal-related City ordinance violations.

In general, public safety call-taking practices should be formalized. Since call takers may be the only person the caller will ever learn anything about animal control or pet owner resources from, it's important that staff's responses positively influence the path for the animal involved and ultimately the perception of the organization in the eyes of the public. Although no industry standards regarding response times to animal control calls exist, response time

benchmarks play a vital role in animal control service and emergency response in general.

Employee safety should be addressed by organizations, particularly for those working in the field. NACA recommends the following practices for animal services field staff:

➢ Issue radios and require staff to always carry while on duty;

➢ Ensure radio communication always can be maintained;

➢ Periodically check-in on deployed field staff; and

➢ Offer personal protection gear.

What We Found

- Field operations training generally meets State requirements, though training certificate retention could be improved to verify training completion.

  o Of the 13 applicable employees, one employee's State required basic animal control officer training certificate was not available. This individual has since left City employment and was not primarily responsible for field operations.

  o The continuing education tracking method used by the Department did not always appear to be accurate. In particular, the employee's basic training completion date did not always appear accurate.

  o Department-required training for field staff is informal and consists of shadowing an officer in the field for up to two weeks before responding to calls independently.

- The process of entering calls for service is generally informal and spread out across several functions, potentially delaying call response times. Response time expectations have not been established for all call types.

  o Requests for Animal Services assistance are received via telephone, email, or Engage Denton messages. Shelter front desk staff receive telephone calls during public operating hours and will enter the requests in the computer automated dispatch, or CAD, system for both emails and telephone calls. The process of entering calls requires administrative staff to leave the front desk to enter the information on a computer with the appropriate software located in a separate room. Engage Denton requests are entered by supervisors at their desks.

  o Callers to the shelter after business hours are directed to a menu with an option for stray animals or animals in distress, which are directed to the Police Department's non-emergency line. The menu also provides

information on adoption fees, location, and hours. However, there was no information directly related to lost pets or reclaiming an animal.

o Calls to the shelter may also be answered by the Public Safety Communications or 3-1-1- Divisions. For emergency calls for service, Public Safety Communications enters information into the CAD system; however, 3-1-1 staff are not able to access this system. Instead call information is forwarded to Animal Services staff via email.

o The Department has not established written expectations for response times to calls for service. However, response expectations for on-call officers are listed in the Public Safety Communication's manual as 30 minutes for Priority 1 or emergency calls.

o As shown in Figure 5, about 68 percent of calls responded to between October 2023 and September 2024 were cleared within an hour of being entered into the system, and there is evidence that Priority 1 calls receive a faster response than other calls.

Figure 5: Call Clearance Frequency Chart
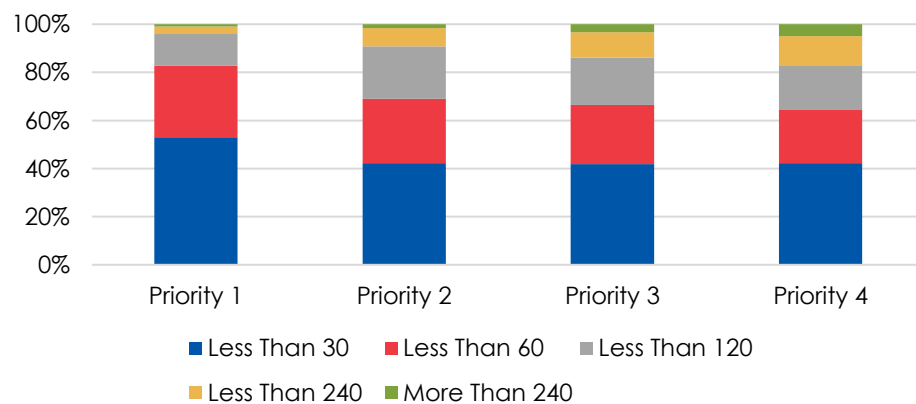
- The Department has some standard operating procedures that provide instructions or expectations regarding major field operations including home quarantines; however, updates are needed to ensure consistent practices and compliance with City requirements.

  o Animal Service Officers can create incident reports to provide further details regarding call events in addition to entering notes into the CAD system. However, there are no written protocols requiring Animal Service Officers to detail the events of a call in the CAD system or guiding them on when further details should be recorded in an incident report.

- o The quarantine animal SOP was last reviewed in 2021 and does not address the new system.

- o A review of all 58 animals listed as home quarantine releases to their owners found that documentation is inconsistent, limiting the ability to verify that Officers visually observed the animal and verified rabies vaccination before permitting the quarantine release. Of the 58, 55 signed agreements and 56 bite reports were located; however, 22 of the bite reports did not clearly identify the bite animal's confinement or restraint at the time of incident. From the available documentation, six of the 58 home-quarantined animals did not appear to meet the qualifications for a home quarantine by law since the animal was 'at-large' at the time of the bite.

- o Per Municipal Court records, 147 citations were issued by Animal Services staff members between October 2023 and September 2024 Eight of those citations were issued by a staff member who is not certified as an officer; according to the City Attorney's Office, citations issued by non-officers should be limited as much as possible. Though there is a standard operating procedure related to handling paper citations, practices on how written citations are scanned and saved by Officers and administrative staff are inconsistent. A review of Municipal Court records found that issued citations did not follow a sequenced pattern indicating the process is inconsistent and that some citations could have been lost.

- Officer safety practices are generally appropriate. Required officer safety equipment and safety practices have not been formalized.

  - o Officers have been issued radios and typically carry them, though this is not a written requirement.

  - o Officers have been offered protective vests, though the Animal Services Department does not have a record of issued protective equipment.

  - o Public Safety Communication staff reported they will periodically check on Animal Service's Officers especially when they are responding to Priority 1 calls.

Why It Matters

The lack of formalized information and expectations regarding call-taking and response times may limit the efficiency of the Department's work as current practices could result in delayed call entry. Clearly establishing response standards would contribute to public safety by helping to prioritize urgent cases, fostering transparency and accountability, potentially improving outcomes for

both the people and animals involved, and promoting community trust in the Department's work.

The current training tracking mechanism increases the risk of Animal Services Officers not completing all required credits within the State-required timeframe, If training is not completed appropriately officers may be required to repeat basic training.

In general, the lack of formalized and updated guidance regarding field operations including required safety practices increases the risk of inconsistency in operations and the risk of the Department not complying with operational requirements. Specifically, the current citation practices increase the risk of citations being lost before reaching the court and the lack of documentation regarding home quarantines increases the risk of incorrectly permitting an animal a home quarantine or releasing an animal from quarantine before requirements are met.

Recommendations:

19. Formalize training tracking to ensure training records are appropriately maintained for all staff. Verify the listed continuing education cycle matches the Officer's completed basic training course date. Department-specific training expectations should be formalized and tracked for both staff that work only in the shelter and for those that work in the field.

   Animal Services Comments: Department will formalize position specific training requirements and training tracking to ensure training records are appropriately maintained and certifications kept up to date.

20. Update the home quarantine standard operating procedure to address the new system and require consistent documentation of visual observations and confirmation of rabies vaccination. Ensure home quarantines are only permitted when animals meet the City requirements.

   Animal Services Comments: Current SOP only requires visual confirmation of the required documentation for home quarantine. SOP will be updated to require documentation of records in shelter management System.

21. Implement a standard operating procedure regarding taking and inputting calls for service including timing expectations and provide comprehensive training to staff. Update the call-taking process to include staff expectations on when calls should be entered and ensure staff members are trained on call-entering including entering future calls to ensure consistent practices. Consider moving computers with the dispatching software closer to front-desk personnel.

Animal Services Comments: Staff will develop a formal SOP and formal training for DAS staff on the call-taking and inputting process. Current facility and security regulations restrict CAD system locations. Proximity of CAD computer to front-desk personnel is planned to be addressed in the facility renovation project.

22. Work with the Public Safety Communication and 3-1-1 Divisions to ensure members of the public calling after hours receive consistent and correct information.

Animal Services Comments: Staff is working with Public Safety Communication and Customer Service managers to ensure correct and consistent information is given to the public. In July 2024, AS staff provided both departments with an updated reference and information guide, and in November 2024, AS staff provided both departments with scripted responses to commonly asked questions. Management from all three departments have established clear lines of communication and addresses any issues or concerns as they arise.

23. Establish protocols for field staff including response time expectations, guidance on when incident reports should be created, and required safety practices.

Animal Services Comments: In July 2024, the department began implementing the use of the case module in the shelter management system to record all incidents and generate reports. The case module provides a standard template and repository of all information related to incidents. The department will formalize protocols on use of the case module and response time expectations for field staff.

24. Formalize a citation submission process that ensures all written citations are transferred to the Municipal Court and permits the Department to track the citations written by their staff.

Animal Services Comments: Department will formalize a citation submission process.

Access to Animal Shelter Assets Should be More Formally Controlled

To safeguard the animals within the City's care, the City must ensure that animals are appropriately tracked, that only authorized individuals have access to them, and that they can be safely transported when necessary. In general, there are three critical asset areas that should be addressed:

 ➢ An animal management system, access to which should be appropriately limited.

 ➢ The shelter facility, access to which should be appropriately limited, physically secured, and prepared for emergencies.

 ➢ Animal transportation vehicles should be tracked, keys should be managed, and should be inspected periodically.

Figure 6: Animal Care Asset Best Practices

Animal Management System
• System Access

Shelter Facility
• Staff Access
• Facility Security
• Emergency Planning

Vehicles
• Tracking
• Key Management
• Inspections

Whenever possible staff should not be scheduled to work alone, and shelters should be equipped with an alarm system. A panic button is recommended for areas where staff is likely to be working alone at night or in the early morning.

In addition, the State of Texas requires that a veterinarian perform an inspection of animal shelters each year to ensure it is structurally sound, animals are fed and watered appropriately, the facility is appropriately cleaned, and rabies quarantine facilities and practices are effective. Finally, the State requires the City have a committee that meets at least three times annually and must contain seven members with specific qualifications.

What We Found

• Access to the City's animal management software is generally appropriate, though more formal documentation of security groups would ensure all users are treated consistently and only receive needed access.

- o The City has purchased an animal management software that allows staff to track animals in the facility, including information on the animal's health and behavior. As with all information systems, best practices recommend that users only be given access needed based on their role and that there be a process to grant and revoke access.

- o There does not appear to be a formalized process for documenting and approving access to the animal management system, including clearly designating roles by job needs.

- o Based on a review of system access, users were generally appropriate though some individuals may have higher access levels than needed when compared to others with similar positions. For example, a contracted veterinary technician who can delete records and backdate exams while others cannot.

- o Further, four individuals have Administrator rights to the system. As this role allows a user to add, edit, and delete all information related to animals and users, it should be limited to as few users as possible.

- o There were two generic logins that did not have a name attached, which could limit accountability for changes made within the system. These logins were generally used by contracted veterinary staff to document intake exams when the staff member did not regularly work at the Denton shelter.

- Shelter facilities are meeting State requirements. Physical access to the shelter could be more formally managed. A Continuity of Operations Plan exists, but additional details could further improve its usefulness.

  - o Animal Shelter staff provided a copy of the 2024 State inspection report indicating that the shelter complied with all state requirements; however, the 2023 report was unavailable for review.

  - o In 2018, a consultant conducted an in-depth review of the Animal Shelter facility and provided several recommendations to address short- and long-term issues. This work was not repeated as part of this audit project due to resource constraints.

  - o Access to the shelter is generally extensive with 1,063 badges having some type of access, including 704 individuals with front door access who are not Animal Services employees. Some of this access may be reasonable for employees in internal service functions such as Facilities or Technology Services; however, access for 63 badges may be inappropriate. Further, 15 badges had been given to volunteers—two of which allow the volunteer independent access through the front door.

- o The shelter is monitored by security cameras that generally provide adequate coverage of the facility, though part of the lobby is not covered. Further, there are no views of animal holding areas, which could limit the City's ability to investigate claims of animal cruelty or impact other accountability needs. In addition, camera footage is stored for 31 days despite staff originally requesting footage to be stored for 60 days. The Shelter is not equipped with security panic buttons.

- o Animal Services has established a Continuity of Operations Plan that was most recently updated in 2023; however, the current contact information is outdated. This plan includes a general overview of operations during a disaster including identifying essential functions and alternative sites if the shelter facility is damaged. Additional detail could be added to help ensure essential services are provided for animals in foster care, how controlled substances will be maintained, and how volunteers will be used if available. In addition, disaster preparedness training should be periodically provided and contact information should be updated routinely.

- Animal Services vehicles have appropriate animal care equipment including environmentally monitored kennels and can be tracked via GPS. Security and management should be formalized with periodic condition checks and key supervision.

  - o There is no written guidance from the Department regarding on how long an animal can be kept in truck kennels. Staff reported that animals are brought back into the shelter shortly after they are loaded into the vehicle and no concerns were noted during observations.

  - o Animal Services has a vehicle inspection standard operating procedure and inspection form; however, it is not currently used by staff. Still these vehicles undergo periodic preventative maintenance inspections like all City vehicles.

  - o All Department vehicles are equipped with GPS tracking. However, the handling of vehicle keys is loosely managed with some staff members retaining a set of keys on their person even after this shift concludes.

- The City of Denton's Animal Shelter Advisory Committee held three meetings in 2023 and five in 2024 and is comprised of all legally required members.

Why It Matters

Best practices suggest that animal shelters may be particularly at risk for theft since they generally hold money, drugs, and potentially high-value animals. For

these reasons, access to the shelter must be appropriately managed and monitored. Development of criteria to ensure access to the shelter and the City's animal management system is granted consistently would help ensure assets are not lost or stolen and that animal records are not manipulated.

Further, ensuring that security camera footage is retained and includes animal feeding areas will help increase accountability and facilitate investigation of any animal cruelty claims.

Recommendations:

25. Develop criteria to guide staff in granting access to staff and contractors to the animal management system. Generic logins should be eliminated to the extent possible to ensure accountability.

    Animal Services Comments: The two generic accounts are used for vet staff who are not consistently scheduled; however, those accounts have limited access to the shelter management system. Access levels can only be granted by administrative users; however, staff will develop formalized criteria and a form for requesting and granting system access. Additionally, staff will conduct quarterly audits of system users and access levels.

26. Improve facility access management processes including establishing criteria for granting access to staff and tracking volunteer access.

    Animal Services Comments: Badge and facility access are managed through the Facilities Department. However, staff will develop formalized criteria and a form for department use to request and grant facility access. Additionally, staff will conduct an annual review of the list of individuals with facility access.

27. Improve security camera coverage to further promote the safety of animals and safeguard City assets.

    Animal Services Comments: In-progress. Exploring options and costs with Facilities Department. If not done now, will address during bond project.

28. Update the Animal Services Continuity of Operations Plan to include information on animals in foster care, controlled substances, and volunteers. Ensure the plan has up-to-date emergency contact information and provide periodic disaster response training.

    Animal Services Comments: Will update contact information and will work with OEM to enhance. Will provide regular training.

29. Implement a procedure to retain annual inspection forms.

    Animal Services Comments: Have developed electronic repository.

30. Establish written guidance regarding transporting animals in Department vehicles including the amount of time an animal should be left in the truck kennel.

    Animal Services Comments: Department will review and update current SOPs to include formalize written guidance for additional processes. It should be noted the audit did not observe or find any concerning issues with the transportation of animals in the vehicles.

31. Reintroduce vehicle inspection procedures and formalize vehicle key management.

    Animal Services Comments: Will reimplement and formalize key management.

Animal Services Fees Have Become Outdated; Lack of Clear Guidance Has Resulted in Inconsistent Charges

In general, local governments like the City of Denton may charge fees to help more equitably fund services by recovering some of the cost from the direct user. Best practices suggest that these fees be authorized by the policy-setting body and that they be based on the actual cost of providing services. In addition, the GFOA suggests reviewing and updating fees periodically, such as every three to five years, and ensuring that accurate fee information is easily available to the public.

Within an animal shelter operation, staff must balance cost recovery against pet population control goals, particularly decreasing the number of stray animals. To encourage this goal, best practices generally recommend the following as part of fee setting:

➢ Not charging for stray animal drop-offs;

➢ Not charging for owner-surrendered animals;

➢ Charging the same amount for cat and dog adoptions;

➢ Offering discounts for less frequently adopted animals; and

➢ Charging more for impounded animals that have not been sterilized.

What We Found

- The most recent Animal Services fee schedule was adopted in 2013 via ordinance and appears outdated. In addition, some unauthorized fees have been charged.

   o The 2013 fee schedule generally aligns with best practices for decreasing stray animals, including not charging for dropping off or surrendering animals. The ordinance includes an incentive for sterilizing animals through a decreased annual registration fee; however, annual registration is no longer required by City ordinance, so this incentive is no longer effective.

   o In addition, based on a review of all fees, Animal Services has charged fees for an owner surrender, and a microchip implant, which are not included on the 2013 ordinance, and has been overcharging for owner requested euthanasia by $15. This resulted in just over $2,000 in revenue being received that was not authorized by ordinance during Fiscal Year 2024.

   o Animal Services plans to bring an updated fee schedule to the City Council for review in 2025. Staff conducted an internal cost analysis to inform these updates. Fees should be updated to reflect current local requirements, continue minimizing animal abandonment, and adjust sterilization incentives.

- The City offers discounts for adoption fees through an agreement with a local nonprofit. Discounts are not always clearly approved.

   o The City of Denton has established a memorandum of understanding with the Denton Animal Support Foundation, a local non-profit, to subsidize adoption fees and provide a method for the City to request additional resources. This memorandum expired as of September 2024.

   o The 2013 fee ordinance specifies that subsidized adoption fees are $30; however, it allows the Animal Services Supervisor to approve further reductions to these fees based on special circumstances.

   o Based on a review of 100 adoptions from Fiscal Years 2023 and 2024, half were charged the regular adoption fee of $60, and 30 were charged the approved subsidy price of $30 for at least one of the animals adopted.

   o An additional 11 adopters were charged less than the approved $30 subsidy amount ranging from no fee to $25 for an animal; none of these adoptions had clearly documented approval, though one was noted as part of a "Clear the Shelter Event." Finally, six adopters were charged nothing as part of the Shelter's informal barn cat program.

Table 5: Adoption Fee Review Summary

Type	Transactions	Actual Revenue
Standard Adoption	50	$3,000
Subsidized Adoption	30	$1,200
Special Adoption	11	$200
Barn Cat	6	$0
Other[11]	3	$30

- Fees for owners reclaiming animals are not consistently charged.

  o The City has established an increasing fee scale for each time an animal is impounded at the shelter as shown in Table 6.

  Table 6: Impoundment Fees

Impoundment	Fee
1st	$20
2nd	$30
3rd	$45
4th	$70
Daily Holding	$8

  o Based on a review of 85 fees charged for returning an animal to its owner, only three appeared to be charged accurately for both the impoundment and holding days. This was generally due to holding days not being charged accurately, though only 47 of the 85 charges had accurate impoundment fees as summarized in Table 7.

Table 7: Impoundment Fee Review Summary

Fee Accuracy Category	Transactions	Actual Revenue
Charged Accurately	3	$104
Impound Fee Accurate	47	$1,263
Both Fees Inaccurate	5	$262
No Fee Charged	30	$0

  o Of the 85 transactions, the holding fee for 45 was only off by one day. Further, notes within the transactions indicate that some staff may believe holding fees do not need to be charged for the first day an animal is held in the shelter, especially if it is picked up before an overnight stay. The 2013 fee schedule specifies that partial first days should be charged the full $8.

  o Finally, 14 of the 30 transactions where no fee was charged had some documentation explaining why, such as the animal being picked up the same day it was impounded, or a resident's hardship such as a tornado. Offering discounts on impound fees aligns with the shelter's goals to decrease stray animals, but this program should be appropriately authorized by the City Council.

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[11] These Other transactions included an unauthorized $10 fee for a rat, a miscategorized Reclaim fee, and a voided transaction.

- Fee transparency could be improved.

  o The current fee for adoptions and impoundment can be found on the City's Animal Services webpages; however, a comprehensive fee schedule is unavailable.

  o During Audit's onsite observation on October 10th, 2024, no fee information was clearly posted at the shelter front desk for the public to reference.

  o Information about discounted adoptions is occasionally posted on Animal Services' social media accounts and animals are marked as eligible for the adoption discount within the shelter.

Why It Matters

In publicly funded animal shelters, the need to fund services through fees must be balanced with pet population control needs. Specifically, if adoption, surrender, or impoundment fees are set too high, the risk that individuals abandon animals in the community increases, which can impact public health and safety. Fees should be periodically reviewed and updated to ensure these goals are continually balanced. Animal Services had previously recognized that the 2013 fee schedule was outdated and has begun the process to update the fee schedule before the audit began.

Once fees are established, they should be accurately and consistently charged. Discount programs for adoptions and impoundment fees are appropriate given the animal shelter's goals of reducing stray animals; however, criteria for these programs should be formally documented to ensure these discounts are effectively designed to incentivize the adoption of animals in need and economically use limited subsidy resources.

Finally, all fee information should be easily accessible. While some fee information is available on the City's website, other information is not, and no information was clearly posted at the shelter's front desk. Posting this information helps to increase transparency, helping potential pet owners make informed decisions.

Recommendations:

32. Periodically review and update the Animal Services fee schedule to ensure it reflects current regulatory requirements, policy-driven cost recovery goals, and appropriate pet population control incentives. Consider having a formal cost-of-service study conducted as part of the next fee update.

    Animal Services Comments: *In-progress. Staff plans to bring proposed fee schedule to Council in Q2 of FY25.*

33. Develop a process to ensure that any discounts applied to regulatorily established fees are appropriately reviewed and approved. This may be through a formally documented and advertised discount program (i.e., "Clear the Shelter" or "30 for 30") or on a case-by-case basis. If the City intends to discount impoundment fees similar to adoption fees, this authority should be granted by ordinance.

    Animal Services Comments: In-progress. Staff plans to bring proposed fee schedule to Council in Q2 of FY25 which will include requesting authority to discount impoundment fees. Staff will formalize written guidance on documenting discounts applied to regulatory established fees.

34. Post a complete fee schedule on the City's website and ensure at least the most commonly charged fees (e.g., adoption, impoundment, etc.) are clearly posted at the customer service desk of the shelter.

    Animal Services Comments: The City's website will be updated to include additional fees. Current Fees will be posted at the shelter front desk.

Audit Project Background

The Internal Audit Department is responsible for providing: (a) an independent appraisal[12] of City operations to ensure policies and procedures are in place and complied with, inclusive of purchasing and contracting; (b) information that is accurate and reliable; (c) assurance that assets are properly recorded and safeguarded; (d) assurance that risks are identified and minimized; and (e) assurance that resources are used economically and efficiently and that the City's objectives are being achieved.

Auditing Standards

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.

Management Responsibility

City management is responsible for ensuring that resources are managed properly and used in compliance with laws and regulations; programs are achieving their objectives; and services are being provided efficiently, effectively, and economically.

Objectives, Scope, and Methodology

The City Auditor's Office has completed an audit of the City's Animal Services operations including animal care within the shelter and in the field, substance and access control, outreach activities, and overall effectiveness. This report is intended to provide assurance that the City has adequate controls to ensure Animal Services is supplying effective animal care in the shelter and throughout the community, verifying compliance with animal control state and local regulations, and adequacy of fee collection practices.

Audit fieldwork was conducted during October, November, and December 2024. The scope of review varied depending on the procedure being performed. The following list summarizes major procedures performed during this time:

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[12] The City of Denton Internal Auditor's Office is considered structurally independent as defined by generally accepted government auditing standard 3.56.

➤ Reviewed documentation to develop criteria including documented policies, industry standards, State of Texas regulations, City requirements, and best practices;

➤ Developed process narratives to identify current control activities in the animal intake, daily feeding, sanitation and cleaning, medical care, animal release, field operations, and staff training processes;

➤ Interviewed staff from the Animal Services Department, City Attorney's Office, Finance Department, veterinary services contractor, and Public Safety Communications Division;

➤ Conducted multiple onsite visits during October, November, and December 2024, including six hours observing cleaning and feeding practices on October 1, 2024, and a ride-along with an Animal Services Officer on October 10, 2024;

➤ Assessed current staffing levels, examined monthly volunteer numbers, calculated shelter staffing needs, and reviewed benchmark city staffing;

➤ Reviewed the current veterinarian services contract and recent invoices to assess billing rates;

➤ Calculated the number of animal intakes processed by the veterinary services contractor and verified medical exam checks were being completed by contracted medical staff;

➤ Administered a public survey to obtain public feedback related to Animal Services operations in October and November 2024;

➤ Selected a sample of 95 stray reclaims from FY2023-2024 to verify return to owner practices;

➤ Selected a sample of 95 owner surrenders and 95 foster and 100 adoption transactions from FY2023-2024 to conduct a review of completed documentation including signed agreements, intake exams, vaccinations records, and behavioral notations;

➤ Selected a sample of 95 euthanasia from FY2023-2024 to assess Department practices and documentation including a review of substance documentation.

➤ Observed surveillance footage of the animal shelter including 5 euthanasia procedures completed during October and November 2024;

➤ Reviewed a judgmental sample of home quarantined 58 animals from FY2023-2024 to assess documentation practices and compare to requirements;

➤ Reviewed response time for calls responded to by Animal Services Officers;

➢ Reviewed available training records to verify compliance with State and Department requirements;

➢ Reviewed a list of all citations issued by Animal Services staff during FY2023-2024 to review sequencing of citations and assess practices;

➢ Reviewed current employee list and compared to Department's system permission access and facility door access;

➢ Reviewed the most recent Continuity of Operations plan and assessed emergency preparedness;

➢ Reviewed Advisory Committee Application data, all 2023 and 2024 Committee meetings minutes, and the 2024 annual Veterinarian Facility inspection to ensure compliance with Texas state law;

➢ Selected a sample of 100 Adoption and 85 Stray Reclaim (Return to Owner) transactions from FY2023-2024 to compare fees charged to Council approved fees;[13]

➢ Reviewed all reported transactions during FY2023-2024 to verify if additional services charged not approved by ordinance; and

➢ Observed public-facing website for cost listings and Department's social media accounts to verify advertisements.

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[13] All sample sizes provide a 95 percent confidence that the true population mean is within ±10 percent of the sample estimate.

Appendix A: Management Response Summary

The following summarizes the recommendations issued throughout this report. The auditors found that staff and the Department were receptive and willing to make improvements to controls where needed. Management has provided their response to each recommendation.

1	*Assess current staffing organization and structure to ensure minimum care standards are maintained without impacting other operations. It is likely additional staff is needed.*		**Agree**
Responsibility:	**Director**	Expected Completion:	**FY25, Q2**
2	*Develop a process for ensuring all required vaccinations and medicines are administered to animals during intake. Require follow-up intake exams for animals that could not complete their initial exam.*		**Agree**
Responsibility:	**Intake Supervisor**	Expected Completion:	**FY25, Q1**
3	*Implement written guidance regarding intake and care of non- dog and cat animals and ensure staff are trained on the procedures.*		**Agree**
Responsibility:	**Intake Supervisor**	Expected Completion:	**FY25, Q1**
4	*Formalize a method for tracking an animal's length of stay and implement monthly medical exams for those that remain in the Department's care for over 30 days. Monthly medical exams should at least include re-checking the animal's weight and providing vaccine boosters.*		**Agree**
Responsibility:	**Outcome Supervisor**	Expected Completion:	**FY25, Q1**
5	*Establish a method to track and verify daily care task completion, including which animals have been fed and what kennels have been cleaned.*		**Agree**
Responsibility:	**Director**	Expected Completion:	**Completed**
6	*Align feeding and cleaning practices and relevant standard operating procedures, including feeding the correct type and amount of food, removing paper bowls from canine kennels as soon as they are emptied, and clarifying how long disinfectant should remain on the kennels before removal. Consider implementing*		**Partially Agree**

	twice a day feeding. If daily supplements are continued to be offered to cats, ensure dosage guidance is provided to staff.		
Responsibility:	**Director**	Expected Completion:	**FY25, Q1**
7	*Implement a standard operating procedure regarding behavior monitoring that requires staff to record observations in the Shelter's animal management system.*		**Partially Agree**
Responsibility:	**Director**	Expected Completion:	**FY25, Q1**
8	*Work with the Purchasing Division to ensure the veterinary care contract includes any extra, appropriate costs that may not be covered in the current agreement. Implement a method to verify contractor billing independently to ensure the City is only paying for services received.*		**Agree**
Responsibility:	**Administration Manager**	Expected Completion:	**FY25, Q2**
9	*Work with the veterinary care contractor to establish inventory management procedures over non-euthanasia drugs to reduce the risk of loss or theft. If possible, an active inventory list should be maintained and drugs should be periodically inventoried by City staff to verify accuracy.*		**Agree**
Responsibility:	**Director**	Expected Completion:	**FY25, Q2**
10	*Enhance promotional efforts for the City's microchip program once appropriate fees have been authorized.*		**Agree**
Responsibility:	**Director**	Expected Completion:	**FY25, Q2**
11	*Consider establishing an owner-requested sterilization program.*		**Partially Agree**
Responsibility:	**Director**	Expected Completion:	**FY26, Q1**
12	*Evaluate shelter operating hours to increase accessibility to the public, especially in the evening. Post information online on how to contact shelter staff to set appointments for lost animal searches or returns on days the shelter is not open to the public.*		**Partially Agree**
Responsibility:	**Director**	Expected Completion:	**FY25, Q3**

13	*Update the Return to Owner Standard Operating Procedure to ensure that legally required verifications are documented in the animal management system.*		**Agree, Partially Agree,**
Responsibility:	**Outcome Supervisor**	Expected Completion:	**FY25, Q1**
14	*Formalize requirements for staff to obtain behavioral forms for owner-surrendered animals and saved to animal's electronic record. Ensure all adoption and owner surrendered agreements are completed and saved to the animals' electronic record. Formalize a method for tracking and saving animal visitation waivers.*		**Partially Agree**
Responsibility:	**Intake Supervisor**	Expected Completion:	**FY25, Q1**
15	*Ensure staff are completing microchip scans and recording the results consistently in the animal management system.*		**Partially Agree**
Responsibility:	**Intake Supervisor**	Expected Completion:	**Complete**
16	*Create formal guidelines for a community cat trap-neuter-return program including criteria for animals to be diverted to the program and education and outreach materials about the benefits of maintaining community cat colonies and how to deal with nuisance cats.*		**Agree**
Responsibility:	**Shelter Manager**	Expected Completion:	**FY26, Q1**
17	*Implement a standard operating procedure regarding Department's drug handling and control for sodium pentobarbital and the pre-euthanasia, sedation drug, including developing a process to compare the drug log to the animal management system for accuracy, and provide regular training. Ensure only trained staff are performing euthanasia procedures and maintain a record of training certificates. Locate and save a copy of the City's current DEA license in Department's records.*		**Agree**
Responsibility:	**Director**	Expected Completion:	**FY25, Q1**
18	*Update the euthanasia standard operating procedure to include documentation requirements within the current system and staff expectations including dosage instructions and required hold times.*		**Agree**

Responsibility:	**Intake Supervisor**	Expected Completion:	**Complete**

19	*Formalize training tracking to ensure training records are appropriately maintained. Verify the listed continuing education cycle matches the Officer's completed basic training course date. Department-specific training expectations should be formalized and tracked for both staff that work only in the shelter and for those that work in the field.*		**Agree**

Responsibility:	**Director**	Expected Completion:	**FY25, Q1**

20	*Update the home quarantine standard operating procedure to address the new system and require consistent documentation of visual observations and confirmation of rabies vaccination. Ensure home quarantines are only permitted when animals meet the City requirements.*		**Agree**

Responsibility:	**Intake Supervisor**	Expected Completion:	**FY25, Q1**

21	*Implement a standard operating procedure regarding taking and inputting calls for service including timing expectations and provide comprehensive training to staff. Update the call-taking process to include staff expectations on when calls should be entered and ensure staff members are trained on call-entering including entering future calls to ensure consistent practices. Consider moving computers with the dispatching software closer to front-desk personnel.*		**Partially Agree**

Responsibility:	**Intake Supervisor**	Expected Completion:	**FY25, Q2**

22	*Work with the Public Safety Communication and 3-1-1 Divisions to ensure members of the public calling after hours receive consistent and correct information.*		**Agree**

Responsibility:	**Intake Supervisor**	Expected Completion:	**Ongoing**

23	*Establish protocols for field staff including response time expectations, guidance on when incident reports should be created, and required safety practices.*		**Agree**

Responsibility:	**Intake Supervisor**	Expected Completion:	**FY25, Q2**

24	*Formalize a citation submission process that ensures all written citations are transferred to the Municipal Court and permits the Department to track the citations*		**Agree**

	written by their staff.		
Responsibility:	**Intake Supervisor**	Expected Completion:	**FY25, Q2**
25	*Develop criteria to guide staff in granting access to staff and contractors to the animal management system. Generic logins should be eliminated to the extent possible to ensure accountability.*		**Agree**
Responsibility:	**Administration Manager**	Expected Completion:	**FY25, Q1**
26	*Improve facility access management processes including establishing criteria for granting access to staff and tracking volunteer access.*		**Agree**
Responsibility:	**Administration Manager**	Expected Completion:	**FY25, Q1**
27	*Improve security camera coverage to further promote the safety of animals and safeguard City assets.*		**Partially Agree**
Responsibility:	**Director**	Expected Completion:	**TBD**
28	*Update the Animal Services Continuity of Operations Plan to include information on animals in foster care, controlled substances, and volunteers. Ensure the plan has up-to-date emergency contact information and provide periodic disaster response training.*		**Agree**
Responsibility:	**Director**	Expected Completion:	**FY25, Q2**
29	*Implement a procedure to retain annual inspection forms.*		**Agree**
Responsibility:	**Director**	Expected Completion:	**Complete**
30	*Establish written guidance regarding transporting animals in Department vehicles including the amount of time an animal should be left in the truck kennel.*		**Agree**
Responsibility:	**Intake Supervisor**	Expected Completion:	**FY25, Q1**
31	*Reintroduce vehicle inspection procedures and formalize vehicle key management.*		**Agree**
Responsibility:	**Intake Supervisor**	Expected Completion:	**FY25, Q1**
32	*Periodically review and update the Animal Services fee schedule to ensure it reflects current regulatory requirements, policy-driven cost recovery goals, and*		**Agree**

	appropriate pet population control incentives. Consider having a formal cost-of-service study conducted as part of the next fee update.		
Responsibility:	**Director**	Expected Completion:	**FY25, Q2**
33	*Develop a process to ensure that any discounts applied to regulatorily established fees are appropriately reviewed and approved. This may be through a formally documented and advertised discount program (i.e., "Clear the Shelter" or "30 for 30") or on a case-by-case basis. If the City intends to discount impoundment fees similar to adoption fees, this authority should be granted by ordinance.*		**Agree**
Responsibility:	**Director**	Expected Completion:	**FY25, Q2**
34	*Post a complete fee schedule on the City's website and ensure at least the most commonly charged fees (e.g., adoption, impoundment, etc.) are clearly posted at the customer service desk of the shelter.*		**Agree**
Responsibility:	**Administration Manager**	Expected Completion:	**FY25, Q1**

Appendix B: Public Survey Results Summary

The responses received from the anonymous customer satisfaction survey administered to the public in the Fall of 2024 are summarized and illustrated below. Each respondent was asked to verify if they lived within the City and if so, what district they reside within. These demographic results are listed in Figure 8.[14]

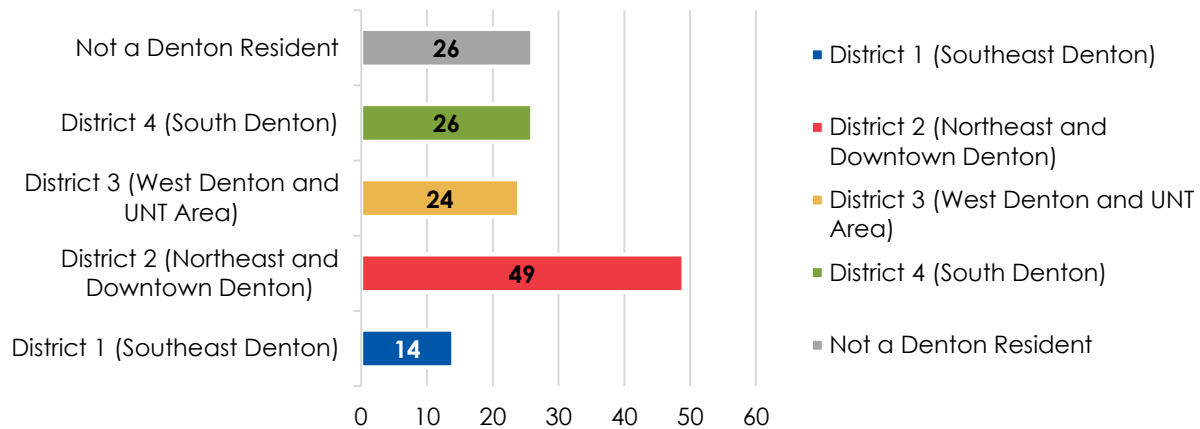**Figure 7:** Survey Responses by District

Table 8 provides a summary of the respondents' satisfaction ratings for the shelter, Animal Service Officers, and Officer's response times based on demographic data.

Table 8: Survey Responses Quality Summary

Location	Avg. Shelter Rating	Avg. ASO Rating	ASO Response Rate
District 1	3.50	3.82	79%
District 2	3.47	3.50	69%
District 3	3.96	4.06	75%
District 4	3.88	3.76	81%
Denton Resident Total	3.67	3.73	74%
Non-Resident	3.11	2.71	54%

Of all the responses, 76% indicated they had visited the shelter 3 or more times as illustrated in Figure 9.

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[14] 3 of the 139 respondents did not provide an answer.

Figure 8: Survey Responses Number of Shelter Visits
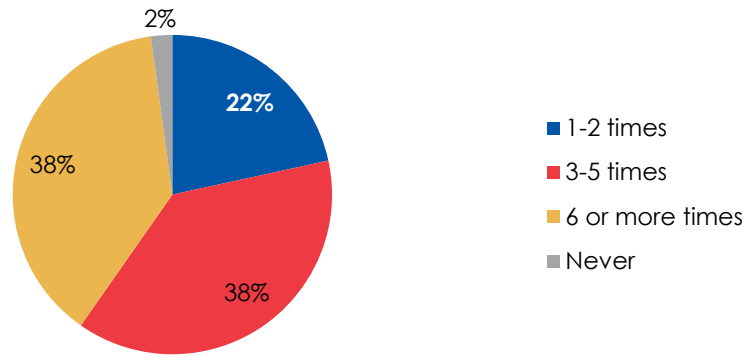
Of the survey respondents, just over 60 percent had adopted an animal from the Linda McNatt Animal Care and Adoption Center. Of those, a majority had completed the adoptions within the last three years as shown in Figure 9.

Figure 9: Adoption Timing History Survey Responses