



GARLAND

INTERNAL AUDIT

Animal Services Audit

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Report 201605

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Overall Conclusion

Overall, we would like to acknowledge the hard work and assistance of the Animal Services staff. They handle a multitude of varied tasks and provide an invaluable service to the City. Strong animal inventory controls and cash handling controls were observed. It was noted in certain instances that daily handling fees were not being charged consistently in accordance with the City Ordinance and the ordering form for one drug used by the shelter was not being properly completed in accordance with federal guidelines. Additionally, expired drugs were in use; however IA did not identify any medical evidence this is harmful. Animal Services staff were unsure of how to properly dispose of these expired materials. Finally, greater controls are recommended in a number of areas to prevent future problems: tracking of controlled substances; fees collected from Garland Pawsibilities; issuance of inspection reports and citations; and tracking of trap inventory and deposits.

Management was also provided with additional Opportunities for Improvement regarding reimbursement of sterilization vouchers and a contract with the City's relief veterinarian. These were not considered significant to the objectives of the audit, but warrant the attention of Management. Consequently, they do not appear in this report.

Authorization

We have conducted an audit of Animal Services. This audit was conducted under the authority of Article VII, Section 5 of the Garland City Charter and in accordance with the Annual Audit Plan approved by the Garland City Council. This audit was requested by the Director of Health.

Objective(s)

Determine the efficiency and effectiveness of operations, including (1) the handling of funds, (2) the citation process, and (3) inventory systems.

Scope and Methodology

IA 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.

The scope of the audit is October 1, 2013 to March 7, 2016, with emphasis on the most recent 18 months when the new Animal Services Manager was in charge.

To adequately address the audit objectives and to describe the scope of our work on internal controls, IA performed the following:

- Performed a surprise cash count.
- Obtained copies of City Ordinances and Directives, State, and Federal law, and determined if Animal Services is in compliance.
- Conducted walkthroughs and determine efficiency and effectiveness of cash handling.
- Compared logs, Animal Service system records, daily deposit information, and finance records to determine the security of cash donations.
- Tracked animals and funds transferred between Garland Pawsibilities and the Garland Animal Shelter.
- Compared information in the Animal Service system with other records, systems, and inventory maintained on site, and any other available sources to ensure information is entered appropriately.
- Obtained records and review the process for issuing and redeeming vouchers for animal sterilizations.
- Examined the process for issuing and tracking incident reports and citations.
- Traced citations through to the Court system to determine correctness, completeness, and timeliness of citation process.
- Performed a surprise inventory of controlled substances maintained on site.
- Reconciled documents for ordering and disposing of controlled substances and examined process for efficiency.
- Conducted interviews with Animal Service Operators to verify various policies and procedures.

To assess the reliability of information obtained through the Animal Services system, IA interviewed multiple individuals at Animal Services, reviewed source documents and reports, and compared information stored in multiple places in the system. Manual records and inventory were compared to reports pulled from the Animal Services system where possible.

During the course of the audit, IA attempted to identify specific types of transactions within the Animal Services system for analysis. However there were a number of system constraints. Information may be stored in several different places within the Animal Services system, and information completed in one screen will not automatically populate in another. Crystal reports were developed to pull specific transaction types, and while the information pulled on the report accurately reflected what was in the system for that transaction, IA was unable to confirm if all records were pulled. For one report, IA was able to confirm that all transactions were not pulled. Therefore this limited IA's ability to develop a complete population. However it was determined that for purposes of the testing performed, the reports were generally sufficient for sampling.

IA additionally reviewed a User Entitlement report to determine who had access to the Animal Services system and at what level. It was discovered during testing that the report

used by IT will pull users who have application access, but not users who have database access. Therefore IA is unable to ensure that there were not any users with unauthorized database access.

Background

"The mission of the Animal Services Division of the Health Department is to provide programs to protect the public from zoonotic diseases and animal bites as well as to investigate nuisances caused by animals. Additionally, stray or lost animals are humanely impounded in the Animal Shelter facility. These services enhance the health, safety, and general sanitation within the city. This is accomplished by apprehending stray animals, investigating animal bite cases, inspecting allegations of animal nuisances (wild and domestic), and providing programs that encourage responsible pet ownership. Animal Services also protects the safety and welfare of animals by intervening when animals face abuse or neglect by their owners."¹ Animal Services handles a tremendous workload, handling approximately 75 calls for service daily, and taking in approximately 10,000 dogs and cats annually.²

The percent of adoptable animals placed has steadily increased during FY2014-15, including three months when all animals considered adoptable were placed.¹ It is not only dogs and cats that are adopted at the shelter, but all sorts of animals including rabbits, guinea pigs, hamsters, parrots, pheasants, hens, and even a duck. This is done in part with their Rescue Coordinator, whose full-time job is to work with rescue groups to get animals placed. Garland Animal Shelter (GAS) also partners with Garland Pawsibilities, a nonprofit group that operates out of the facility on Main Street. They are able to provide a higher profile for animals needing adoption, including off-site events, which help to get more animals adopted. Their mission is to "save the lives of Garland Animal Shelter animals by taking adoptable animals out of the shelter and finding them a forever home."² Garland Animal Shelter provides spayed/neutered dogs or cats who are ready for adoption, along with the necessary paperwork, and Garland Pawsibilities cares for them and finds them homes, as well as conducting offsite events to increase the visibility of the animals that need homes. Garland Pawsibilities charges prospective adopters fees in accordance with City Ordinance or according to any specials that may be running at the shelter at that time. They give the fees to GAS, but are permitted to keep a portion of the fee to compensate for their work in getting the animal adopted.³

In February 2016, 114 animals were reclaimed by their owners, 133 were adopted at the animal shelter, 26 were adopted at the pet adoption center operated by Garland Pawsibilities, 2 animals were adopted offsite, and 140 were adopted by rescue clubs.⁽⁴⁾ The GAS and Garland Pawsibilities also run frequent "specials" to get animals adopted, including half priced pets for Valentine's day, half priced adoption fees with a donation to Toys For Tots, free adoptions on Black Friday, or free adoptions for Active Military, Reservists, and Veterans on Veterans Day.⁽³⁾

In addition to finding local animals homes, pet registrations, and providing low-cost vaccinations, Garland Animal Services handles a wide range of calls from citizens which include complaints about stray and neighboring animals, loose livestock, concerns about animal bites and potentially rabid animals, and providing traps for citizens who have nuisance wildlife on their property, to name but a few. In February 2016 alone, Animal Services received 1,769 telephone calls, 5 major bite reports, 18 minor bite reports, 56 dog barking complaints, and responded to 732 stray animal calls.⁴

Animal Service Officers (ASOs) issue warning letters to citizens if they note a violation of a City Ordinance (called Inspection Reports). If the violations in the Inspection Report are not resolved timely, the ASOs are able to issue citations to citizens which are sent to Court for processing. A citation may be issued immediately if an offense is severe. In February 2016, ASOs issued 136 Inspection Reports, and 59 citations.⁴ If an animal other than a cat is running at large, it will be impounded.

City Ordinance 6621 was approved in June of 2013⁶ requiring all animals which have been impounded to be sterilized within 30 days. The owner pays the fee for the sterilization at the time the animal is reclaimed, and is issued a voucher for sterilization of the animal. The owner may then take the voucher to a vet for services to be rendered. This voucher may be given to the vet as payment for the services; the vet may then return the voucher to Garland Animal Shelter for a \$75 fee. Conversely, the owner may pay for the services up front, and bring proof of sterilization with the voucher to Garland Animal Shelter for reimbursement. The reimbursement is either refunded to the owner's credit card, or a check is requested from the Finance Department, depending on the method of original payment.³

Sources:

1. City of Garland 2015-16 Proposed Budget
2. Garland Pawsibilities website: www.garlandpawsibilities.org
3. Uriel Villalpando, Animal Services Manager
4. <https://www.garlandanimalservices.org/gov/ab/animals/statistics.asp>
5. <http://www.garlandanimalservices.org/civicax/filebank/blobdload.aspx?BlobID=9807>
6. Garland City Ordinance, Section 22 .06(A)(1)

Management Accomplishments*

Health Department Management requested this audit for the purpose of performance improvement. Originally scheduled for FY 2014/15, this audit follows a performance evaluation by Strategic Government Resources authorized by Council in 2015. Both processes validated many effective department operations while providing suggestions for improvement in other areas.

*Please note that "Management Accomplishments" are written by the audited entity and that Internal Audit did not audit or verify its accuracy.

Opportunities for Improvement

During our audit we identified certain areas for improvement. Our audit was not designed or intended to be a detailed study of every relevant system, procedure, and transaction. Accordingly, the Opportunities for Improvement section presented in this report may not be all-inclusive of areas where improvement might be needed.

FINDING # 1: Controlled Substances	
CONDITION (THE WAY IT IS)	<ol style="list-style-type: none"> 1. GAS has a number of drugs on hand for use on site. Three of the drugs maintained on site are regulated by varying degrees by the United States Drug Enforcement Administration (DEA). The most regulated drug on site is a Schedule II drug which has specific Federal regulations regarding purchase, use, and disposal. However the Form 222 required for tracking purchases and received shipments had two columns that were not being completed appropriately. 2. The process of drug ordering, tracking, and disposal was generally controlled by one individual with very little segregation of duties. 3. Expired inventory was on hand. One expired drug was confirmed as in use. IA could not identify negative effects of using the expired drug beyond its expiration date⁽¹⁾. 4. GAS was accepting and using donated drugs from the community and drug vendors (ex: heartworm medication and pain relievers). <p>(1) Journal of the American Medical Association (JAMA): JAMA Internal Medicine: Stability of Active Ingredients In Long-Expired Prescription Medications. November 26, 2012, Vol 172, No. 21</p>
CRITERIA (THE WAY IT SHOULD BE)	<ul style="list-style-type: none"> • DEA requires that they be able to trace all Schedule II drugs from purchase to dispensation/disposal for a period of 2 years. DEA requires Form 222 to be used and completed properly. • Procedures should be in place regarding ordering, accepting, storing, using, tracking, and disposing of drugs. These should establish segregation of duties, rotation of stock to prevent expiration of inventory before usage, and procedures for what to do if drugs on hand are no longer needed (either not in use or expired).

<p style="text-align: center;">CAUSE (DIFFERENCE BETWEEN CONDITION & CRITERIA)</p>	<ol style="list-style-type: none"> 1. Staff were unaware the additional section of the form was to be completed by the purchaser. 2. Due to Federal requirements, one individual processes the majority of the orders. This individual also utilizes the majority of the drugs. Adding individuals to the process was not considered. 3. <ol style="list-style-type: none"> A. Management requires a 6-month supply on hand, but usage has been decreasing. Orders were not routinely checked upon receipt to determine expiration date. Stock was not rotated to ensure oldest bottles were used first. B. There were no established procedures for disposing of expired stock. Staff were unsure of how to properly dispose of drugs, and were therefore storing them in lieu of disposal. 4. Donated inventory was accepted to reduce medical expenses.
<p style="text-align: center;">EFFECT (SO WHAT?)</p>	<ol style="list-style-type: none"> 1. The DEA could impose fines or litigate. One DEA Agent stated he was in the process of fining a business \$10,000 for not completing the specific columns on the DEA Form 222. The DEA could also revoke the DEA registration number, which would prevent access to necessary drugs used at the shelter as this number is required for purchase. 2. Irregularities in drug inventory could go unnoticed. 3. IA could not identify any medical impact of using the expired drug beyond its expiration date. However having expired drugs in use could be perceived as a problem by some members of the public. 4. Unsafe or tampered medications could unknowingly be put in use at the shelter.
<p style="text-align: center;">RECOMMENDATION</p>	<p>The responsible party should:</p> <ol style="list-style-type: none"> 1. Complete all sections of the DEA 222 as required.

	<ol style="list-style-type: none"> 2. Establish segregation of duties by having an individual that does not order the drug inventory receive and reconcile drug stock on a regular basis. Develop procedures for ordering, tracking, using, and disposing of drugs, rotating stock, and regular inventory reconciliation. 3. Communicate with the Dallas branch of the DEA and the Garland Police Department to implement procedures for disposing of expired inventory. 4. Discontinue acceptance and use of donated inventory.
MANAGEMENT RESPONSE	Concur
ACTION PLAN	<ol style="list-style-type: none"> 1. The individual responsible for ordering controlled substances has been trained to properly complete the DEA 222 form for all orders. 2. Management will develop procedures to address all aspects of the ordering, use and disposal of controlled substances. The Animal Services Manager will regularly reconcile drug inventory and ordering. 3. The Animal Services Manager established disposal procedures for expired drugs with the DEA and GPD. All expired drugs were properly disposed of by GPD on February 24, 2016. 4. Staff discontinued the acceptance of donated drugs on January 21, 2016.
IMPLEMENTATION DATE	Procedures for drug ordering, use and disposal will be established by May 1, 2016. All other items have been corrected.

FINDING # 2: Citations

<p>CONDITION (THE WAY IT IS)</p>	<p>1. In 43 of 60 cases examined (72%) there was an error in the documentation provided to Court. Refer to Exhibit A for Sampling Methodology.</p> <table border="1" data-bbox="651 401 1419 680"> <thead> <tr> <th># Error</th> <th>% Error</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>31</td> <td>72%</td> <td>Insufficient or absent Probable Cause Affidavit</td> </tr> <tr> <td>16</td> <td>37%</td> <td>Errors in information provided to Court, but corrected with action by animal owner (payment of fine, etc)</td> </tr> <tr> <td>8</td> <td>19%</td> <td>Incorrect officer information entered by Court due to handwriting issues</td> </tr> </tbody> </table> <p>Note: one citation may contain more than one error</p> <p>2. Voided citations are left in manual citation books and are not being tracked or reviewed. Notes on why citations are voided is not being consistently recorded.</p> <p>3. Manual citation books are checked in and out by Animal Service Officers (ASOs) with minimal oversight and no reconciliation. A number of data entry errors were noted on the log for checking the citation books in and out.</p>	# Error	% Error	Description	31	72%	Insufficient or absent Probable Cause Affidavit	16	37%	Errors in information provided to Court, but corrected with action by animal owner (payment of fine, etc)	8	19%	Incorrect officer information entered by Court due to handwriting issues
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<p>CRITERIA (THE WAY IT SHOULD BE)</p>	<p>1. Case information should be as complete as possible when sent to Courts to maximize efficiency. Courts should be provided with all necessary documentation for a case promptly.</p> <p>2. Voided citations should be clearly marked with a reason for the void. The voided citation should be sent to Court along with completed citations for tracking purposes. This is a best practice followed by several City departments including the Police Department and Code Compliance.</p> <p>3. Citation books should be tracked.</p>												
<p>CAUSE (DIFFERENCE BETWEEN CONDITION & CRITERIA)</p>	<p>1. A. Citations are manually completed by ASOs and copies are sent to Courts where they are entered by clerks. If additional information is needed regarding the citation, the ASO is emailed. Management believed Courts was notifying them of all outstanding issues.</p>												

	<p>B. Lack of periodic training by experts regarding issuance of citations and documentation for successful completion in Court.</p> <p>2. No procedure was developed for processing voids. Management did not verify such a policy was in place when he moved to Animal Services from another department.</p> <p>3. The logging of citation books was self-completed by ASOs. No reconciliation or oversight was considered.</p>
<p>EFFECT (SO WHAT?)</p>	<p>1. Justice will not be served if sufficient, complete, and legible information is not sent to Court.</p> <p>2. Citations which are inadvertently not sent to Court may be missed because they are assumed to be voided.</p> <p>3. Inappropriate activities could take place undetected.</p>
<p>RECOMMENDATION</p>	<p>The responsible party should:</p> <p>1. Ensure ASOs receive training regarding Probable Cause Affidavits. Management should consider consulting with the City Attorney's Office for this training.</p> <p>2. Develop procedures for voided citations, including recording a reason for the void, and sending of voided citations to Courts for input into the Court system and tracking.</p> <p>3. Issue citation books to ASOs and collect the citation books when completed. A periodic inventory and reconciliation should additionally be considered.</p>
<p>MANAGEMENT RESPONSE</p>	<p>Concur</p>
<p>ACTION PLAN</p>	<p>1. Probable Cause Affidavit training has been scheduled with the City Attorney's Office for April 19, 2016.</p> <p>2. Training on how to document and process voided citations will be included with the probable cause affidavit training.</p>

	3. The Animal Services Manager will maintain all used and unused citation books in a secure location and will maintain records of when books were assigned and returned.
IMPLEMENTATION DATE	May 1, 2016

FINDING # 3: Inspection Reports

**CONDITION
(THE WAY IT IS)**

Inspection Reports (IRs) are issued by ASOs when a violation is noted. These serve as "warning letters" to citizens, offering them a chance to comply before a citation is issued. These are noted in the Animal Services system to allow any other ASOs responding to an address to keep up-to-date on the status and prevent duplicates from being issued. These are additionally logged on a spreadsheet by the Department Coordinator.

- Detailed notes regarding the issuance, reason, and follow up of an IR are not documented in the Animal Services system for 18 of 32 cases (56%). Refer to Exhibit A for sampling methodology.
- IRs are stored and retrieved based on street address. However variations in data entry (ex: inclusion of Drive in the street name, or recording both I30 and Interstate 30) made record location time consuming and difficult. This is problematic for ASOs attempting to access the history at a location.
- A person or animal may be recorded in the system under more than one identification (ID) number. Duplicate animal and person IDs were a significant issue in 2 cases sampled (6%). In one case 6 IDs were found for one person, with 19 different animal IDs. At least 3 of these IDs were for a single animal. This caused the IR to be incorrectly marked as completed, and reissued by another ASO the following month.
- There is no reconciliation between the tracking spreadsheet for the IRs and the Animal Services system.

**CRITERIA
(THE WAY IT SHOULD
BE)**

- Detailed notes need to be available in the Animal Services system to ensure ASOs have all relevant information before responding to an address.
 - Guidelines should be in place for entering addresses to make records as consistent as possible.
 - System information should be clear so ASOs can clearly identify the status of a case.
 - Staff should be aware of the procedure for tracking IRs.
-

<p>CAUSE (DIFFERENCE BETWEEN CONDITION & CRITERIA)</p>	<ul style="list-style-type: none"> • Management informed us that the system will lock out users, freeze, or crash while attempting to enter notes. Notes are a new process which has been implemented by current management within the last 18 months. • Animal Services system does not cross-populate information between screens. Information may be loaded in one screen but not another. Reviewing all pertinent screens is difficult and time consuming. • Animals that come in with no tag or other identification may be assigned a duplicate animal identification number. Similarly, an animal may be assigned duplicate ID numbers if it is associated with more than one person ID in the Animal Services system. • Staff are not clear on what is being done with the tracking spreadsheet and expectations. A review of IRs is not being performed, but staff believes it is.
<p>EFFECT (SO WHAT?)</p>	<ul style="list-style-type: none"> • An ASO will not have all the pertinent information for a case before responding to a service call. This can cause difficulties on site and create a negative experience for citizens. Duplicate IRs or citations may be inappropriately issued. Citizens may feel they do not have to comply with Animal Service requests if follow up is not timely and/or correct. • Staff may be assuming they will be notified of outstanding IRs if issues are missed. This may cause problems with appropriate follow up.
<p>RECOMMENDATION</p>	<p>The responsible party should:</p> <ul style="list-style-type: none"> • Develop a procedure for completion and tracking of IRs which is clearly communicated with staff. • Ensure appropriate notes are being detailed and appropriate follow up completed. • Review a sample of IRs regularly. • Combine duplicate IDs when discovered.

	<ul style="list-style-type: none"> • Consider implementing a mandatory microchipping for animals entering the shelter. As all animals that enter the shelter are scanned for a microchip, this will prevent creation of duplicate animal IDs. • Consider working with IT and the system vendor to determine if it is possible to have the Animal Services system cross-populate information into all pertinent data fields. This will improve both effectiveness and efficiency of operations.
MANAGEMENT RESPONSE	Concur
ACTION PLAN	<ul style="list-style-type: none"> • Management implemented weekly follow up procedures requiring a status report from ASOs on all IRs that have been outstanding for more than 7 days. • Management will streamline the existing procedures for tracking IRs. • The Animal Services Manager will develop procedures to monitor the use of detailed notes in the software system. With the recent implementation of new modems, detailed notes entered in the field should not be a problem. Management already has a procedure in place for entering notes into Chameleon in the field. • IRs will be reviewed on a regular basis to ensure consistency with the procedures that will be developed to track IRs. • Duplicate IDs will be combined as they are found. • Staff presented a proposal for mandatory microchipping of all animals impounded by Animal Services to the Community Services Committee on February 15, 2016. This item remains pending before the committee. • Management will work with IT and the software vendor to determine if the system can cross-populate information in all pertinent data fields.
IMPLEMENTATION DATE	July 1, 2016

FINDING # 4: Fees in Accordance with City Ordinance

CONDITION (THE WAY IT IS)	<ul style="list-style-type: none">• Handling fees are being charged according to whether the animal had an overnight stay. If an owner reclaims an animal the same day, s/he is not being charged a daily handling fee.• Impoundment fees were incorrectly charged in 13 of 50 (26%) impoundments tested.
CRITERIA (THE WAY IT SHOULD BE)	<ul style="list-style-type: none">• City Ordinance 22.06 (B) states: "A daily handling fee shall be charged for every day, or fraction thereof, that an animal is at the animal shelter."• City Ordinance 22.06 (A) states that impoundment fees are charged based on the class of animal, whether the animal has been spayed/neutered, and how many times the animal has been impounded previously.
CAUSE (DIFFERENCE BETWEEN CONDITION & CRITERIA)	<ul style="list-style-type: none">• According to Management, owners who pick up their animal an hour after being impounded do not feel they should be charged a daily handling fee. An owner whose animal has been impounded after close of business and who picks up their animal when the shelter opens the following day does not feel s/he should be charged two days of handling fees.• Impoundment fees are charged based on several criteria, including animal type, number of impoundments, and if the animal has been spayed/neutered. However the necessary information to calculate the correct fee is stored in several places in the Animal Services system and there is not one place that consistently contains the necessary information. The information is not cross-populated in the Animal Services system.
EFFECT (SO WHAT?)	<ul style="list-style-type: none">• Handling fees are being undercharged by approximately \$5.00 per impoundment. For February 2016, 114 animals were reclaimed by their owners. This would have resulted in an estimated \$570 in lost revenue.• For the 50 impoundments tested, a total of \$585 in lost revenue was identified.
RECOMMENDATION	The responsible party should:

	<ul style="list-style-type: none"> • Ensure handling fees are correctly charged according to the City Ordinance <u>OR</u> request a change in the wording of the City Ordinance to reflect current practices. • Provide additional staff training to ensure that information is recorded and reviewed in consistent screens to minimize calculation errors. • Consider working with IT and the system vendor to determine if it is possible to have the Animal Services system cross-populate information into all pertinent data fields. This will improve both effectiveness and efficiency of operations.
MANAGEMENT RESPONSE	Concur
ACTION PLAN	<ul style="list-style-type: none"> • Management will attempt to modify procedures for daily handling fees so that they are charged on a 24 hour basis rather than calendar days. This will prevent the possibility of multiple “partial day” charges. • The Animal Services Manager will provide staff training to ensure data is consistently recorded and reviewed to minimize calculation errors during monthly staff meetings. • Management will work with IT and the software vendor to determine if the system can cross-populate information in all pertinent data fields.
IMPLEMENTATION DATE	July 1, 2016

FINDING # 5: Garland Pawsibilities Agreement

CONDITION (THE WAY IT IS)	<p>The animals being adopted out by Garland Pawsibilities belong to GAS and appear on GAS inventory. GAS will either take the animals to Garland Pawsibilities or a volunteer will come pick them up from GAS. Garland Pawsibilities collects an adoption fee according to City Ordinance and GAS procedures, and in turn gives the fees to GAS. Garland Pawsibilities is permitted to keep a portion of the fee.</p> <p>However over time the procedure for determining the portion of the fee retained by Garland Pawsibilities has varied due to verbal agreements between parties.</p> <ul style="list-style-type: none">• There is not currently a written agreement in place with Garland Pawsibilities regarding adoption fees to be paid to the City. When the previous agreement expired, a new agreement could not be put into place because of the lessors requirements at the new location. IA did not note any issues with GAS receiving correct and timely payments from Garland Pawsibilities.• There are no policies and procedures regarding animals taken to the Main Street location. Inventory of animals at GAS and Garland Pawsibilities is conducted but not on a set schedule. At the time of the surprise inventory, one cat was listed as at the Garland Pawsibilities location but had been adopted 5 months previously.• City of Garland is responsible for building maintenance and care as we are currently the long-term tenants of the property, but this was not being monitored. No GAS staff are assigned to that location.
CRITERIA (THE WAY IT SHOULD BE)	<ul style="list-style-type: none">• Agreements should be put in writing regarding fees to be paid to the City to prevent disagreements with Garland Pawsibilities, and provide accountability that the City is collecting the correct amount.• Policies and Procedures should be put into writing to protect all parties in the event of an incident and to provide clarification for staff and volunteers.
CAUSE	Adoption fees were originally included in the lease agreement with Garland Pawsibilities. When Garland

<p>(DIFFERENCE BETWEEN CONDITION & CRITERIA)</p>	<p>Pawsibilities moved to a new address, a sub-lease was not permitted by the lessor. No new agreement was put in place.</p> <p>Originally, GAS staff were working at the Garland Pawsibilities location and fees varied based on if GAS staff was present and if the adoption took place off-site. However over time the facility was slowly turned over to Garland Pawsibilities entirely. However, the City of Garland is the lessee for the property and responsible for any damages which might be incurred.</p>
<p>EFFECT (SO WHAT?)</p>	<ul style="list-style-type: none"> • A disagreement between the two parties could arise regarding fees owed to the City. • Animals could go missing in transport between GAS and Garland Pawsibilities. While this would be detected during inventory, the detection would be delayed which could make accountability difficult. • Long term damage could occur to the facility for which the City of Garland would be liable.
<p>RECOMMENDATION</p>	<p>The responsible party should:</p> <ul style="list-style-type: none"> • Put a written agreement in place which stipulates what fees will be paid to the City by Garland Pawsibilities, how these fees are to be paid, and when. This will provide accountability that the City is collecting the correct fees. A periodic review is recommended. • Create additional policies and procedures in writing, including transfer of animals, responsibilities of Garland Pawsibilities (veterinary care, purchase of supplies, etc.), and building inspection and maintenance to protect all parties in the event of an incident and to provide clear guidance to staff and volunteers. • Conduct animal inventories periodically, with minimum standards set for how frequently inventory is to occur. All discrepancies should be reconciled timely.
<p>MANAGEMENT RESPONSE</p>	<p>Concur</p>

ACTION PLAN	<ul style="list-style-type: none">• Staff will work with the City Attorney’s Office to implement a written agreement that stipulates the existing split of adoption fees for Garland Pawsibilities.• Management will work to draft procedures detailing the responsibilities of Garland Pawsibilities and Garland Animal services regarding the Pet Adoption Center.• The Animal Services Manager has implemented a procedure of routine inspections of the Pet Adoption Center that includes an animal inventory and facilities inspection.
IMPLEMENTATION DATE	July 1, 2016

FINDING # 6: Access to Animal Services System

CONDITION (THE WAY IT IS)	<ul style="list-style-type: none">• Two prior employees had access to the Animal Services system that had not been correctly terminated. Another user had an inappropriate level of access.• Users are not required to change passwords in the Animal Services system.
CRITERIA (THE WAY IT SHOULD BE)	<p>IT Directive 2: Electronic Systems Use states “Privileged Access to the City of Garland’s technology resources must be tightly controlled so that such access is granted only to those who require it in order to carry out their essential job duties, and occurs only when necessary.”</p> <p>It further states “[u]sers will be provided with ‘Minimum Necessary Access’ to technology resources to facilitate the efficient and effective performance of their duties.”</p> <p>Passwords should be changed periodically to prevent unauthorized access to systems.</p>
CAUSE (DIFFERENCE BETWEEN CONDITION & CRITERIA)	<ul style="list-style-type: none">• Management was unaware of discrepancies in users and access level. Management informed us they had noted issues on the last User Entitlement Report and reported these to IT, but did not follow up on if these were corrected. IA was unable to verify this.• Original passwords to the Animal Services system are assigned by IT. Passwords do not expire, nor are users prompted to change passwords. IT informed us this is because of the way the system was originally set up (as a database).
EFFECT (SO WHAT?)	<p>Staff and former employees could perform inappropriate activities in the Animal Services system undetected, exposing the City to loss, damage, or unauthorized changes to critical functions.</p>
RECOMMENDATION	<p>Management should:</p> <ul style="list-style-type: none">• Follow up with IT to ensure user access is terminated or updated upon request.

	<ul style="list-style-type: none"> • Work with IT to develop a process whereby employee passwords are changed regularly.
MANAGEMENT RESPONSE	Concur
ACTION PLAN	<ul style="list-style-type: none"> • Management will follow-up with IT after each annual user access evaluation to ensure that the requested changes have been made. • The Animal Services Manager will work with IT to implement a process where employee passwords will be regularly updated.
IMPLEMENTATION DATE	July 1, 2016

FINDING # 7: Traps

CONDITION (THE WAY IT IS)	<p>For FY15 and the early part of FY16, Animal Services has spent approximately \$3,626 in traps. These are used by ASOs on service calls, provided to other City departments at no charge, rented by citizens for a refundable deposit, and used by Garland Pawsibilities and citizens for a City program to sterilize feral cats.</p> <p>At the time of the audit:</p> <ul style="list-style-type: none">• Procedures for tracking inventory of traps is being developed.• Deposits for traps are not reconciled.
CRITERIA (THE WAY IT SHOULD BE)	<p>Inventory and deposit controls, including regular reconciliation, should be in place to ensure there is not loss of inventory or deposits.</p>
CAUSE (DIFFERENCE BETWEEN CONDITION & CRITERIA)	<ul style="list-style-type: none">• Animal Service staff were unaware a report was available in the system to track trap rentals.• An inventory tracking system and deposit reconciliation were not considered.
EFFECT (SO WHAT?)	<p>Animal Services cannot easily determine if the correct deposits are on file, how many traps are available, or when traps are due back. This prevents effective inventory management. Additionally, they cannot advise citizens inquiring about traps when they will have one available.</p>
RECOMMENDATION	<p>Management should implement a system for tracking trap rentals and deposits. Traps and deposits should be reconciled regularly.</p>
MANAGEMENT RESPONSE	<p>Concur</p>
ACTION PLAN	<p>Management has already begun to develop and implement a system that tracks trap rentals and deposits and a regular reconciliation of traps and deposits.</p>
IMPLEMENTATION DATE	<p>May 1, 2016</p>

Exhibit A – Sampling Methodology

Fees in Accordance with City Ordinance

A list of all transactions which had impoundment and boarding fees as item codes, and which had not been reversed, was pulled from the Animal Services system for the scope of the audit using Crystal reports. A list of 2,843 transactions resulted. A pivot table was created which listed the receipt numbers by animal ID. All animals which had more than two receipt numbers listed (13 animals) were included in this sample. Of the remaining 69 animals which had 2 or fewer receipts listed, the 7 most recent animals were added to the sample for a total of 20 animals and 50 impoundment receipts. Results can be projected to the intended population.

Citation Book Testing

A Crystal report was run from the Court system for all Animal Services citations which had an offense date within the scope of the audit. A list of 2,278 citations resulted. IA judgmentally selected 9 citations that had an officer listed which did not belong to Animal Services or had no officer listed. An additional 51 citations were selected randomly using Excel Active Data from the remainder of the population. Results can be projected to the intended population.

For the manual review of citation books, 33 citation books (out of 85 that were in use during the scope of the audit) had been pulled based on errors noted in a separate test. From the available books, 10 were judgmentally selected, each from a different Animal Services Officer, with emphasis on the past 18 months because this is how long the current Manager has been in place. Results can be projected to the intended population.

Inspection Reports

Animal Services issued approximately 1,484 Inspection Reports (IR) from January 2015 to January 2016 (inclusive). The sample of 32 Inspection Reports was pulled from three sources:

- One Animal Services Officer was asked for all active IRs in his truck. All 10 of these were included in the sample.
- From the completed IRs filed at Animal Services, all IRs that had a street name beginning with “A” or “R” were copied during a site visit. These 108 IRs were entered into a list in Excel and Active Data was used to select a random sample of 10. One of these belonged to the ASO for whom all active reports was sampled; one duplicate street was identified. Therefore Excel Active Data was used to randomly select another two, for a total of 12 completed IRs sampled.
- The Department Coordinator maintains a spreadsheet of completed IRs. 1652 IRs were listed for FY14-15, and 483 were listed for FY15-16 through January 21st. 10 of these were judgmentally chosen by selecting the oldest IRs which did not have a completion date listed.

Results can be projected to the intended population.