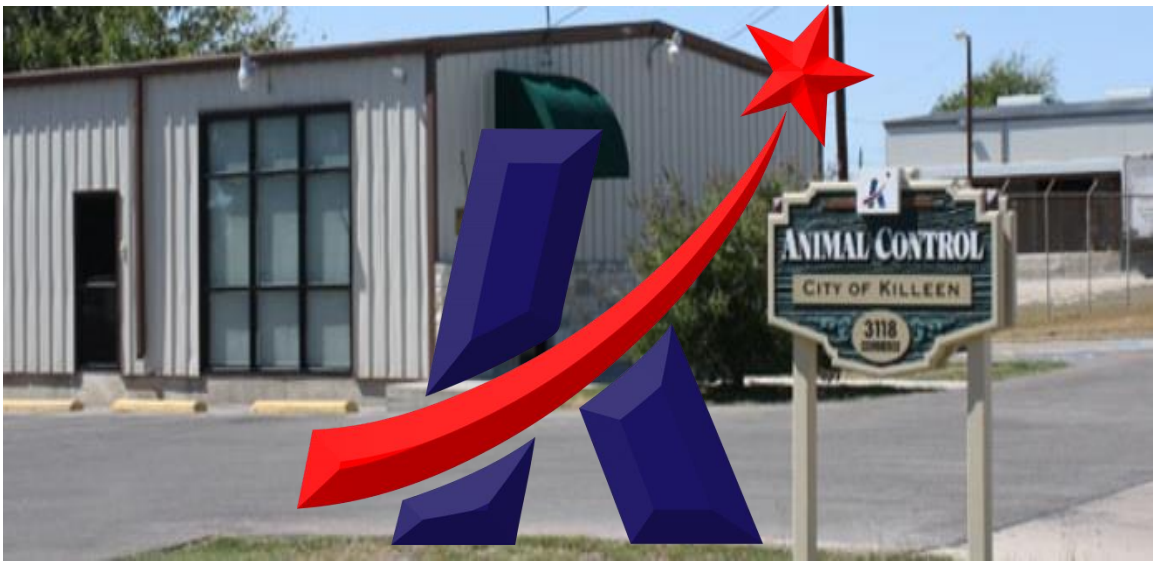

CITY OF KILLEEN

ANIMAL SERVICES UNIT AUDIT

ANIMAL SERVICES SHOWS MARKED IMPROVEMENT UNDER INTERIM LEADERSHIP

Audit Report #19-01

A Report to the City of Killeen Audit Committee

Committee Chair	Jim Kilpatrick
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Prepared by

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November 2018

EXECUTIVE SUMMARY

AUDIT REPORT HIGHLIGHTS

Why Was This Audit Conducted?

The City Auditor requested in March 2018 that the Audit Committee approve the addition of the Animal Services audit to the FY 2018 Audit Plan, following the City's termination of its Animal Services Manager in February 2018. The purpose of the audit was to review Animal Services policies and practices, and assess interim management's performance from March 2018 through the end of FY 2018.

The City Auditor appreciates the cooperation of City management and staff in the completion of this audit.

Killeen Animal Services Unit Audit

Mayor and Council,

I am pleased to present this audit of the Killeen Animal Services Unit.

Objectives and Scope

The objective of the audit was to assess select Animal Services' policies and practices as they compare to best practices recommended by national and state organizations, and adopted by other local government animal shelters. The scope focused on, but was not limited to shelter operations from FY 2014 through FY 2018.

Audit Results

Animal Services showed marked improvement under Staff Services' interim stewardship. These improvements include: (1) increase in the live release rate from 83 percent in FY 2017, to a cumulative live release rate of 90 percent through August 2018; (2) purchases of commercial grade appliances, a new kennel cleaning system, planned purchase of multi-compartment cat cages; (3) an increase in promotional activities; and (4) greater outreach to local non-profit groups. However, policy impediments persist that may undercut Animal Services' ability to sustain its improved live release rates. The use of adoption contracts to comply with state spay/neuter laws is neither efficient, nor effective. Further, Animal Services has yet to develop a viable TNR program, in coordination with local non-profit groups and community cat caregivers to contain the City's feral cat population. Finally, Animal Services has yet to develop a marketing strategy, in coordination with the Communications Department to fully harness traditional and social media in support of their adoption promotion activities.

What Was Recommended

The City Auditor recommended that management adopt the best practice of pre-sterilization for adoptable animals; develop a viable TNR program, and further develop its use of traditional and social media, in coordination with the Communications Department to promote animal adoptions.

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INTRODUCTION

The City Auditor conducted this performance audit of the Killeen Police Department's Animal Services Unit pursuant to Article III, Chapter 40 of the City Charter, as Amended May 11, 2013, and in accordance with the City Auditor's Annual Audit Plan, approved by the Audit Committee, April 17, 2017, and amended on March 20, 2018.

This audit was not included in the original audit plan; it was proposed to the Audit Committee in March 2018 as a replacement for the planned audit of the now defunct Red Light Enforcement Program. The Animal Services Unit audit was proposed for several reasons: (1) the unit has never been audited; (2) the operation had recently undergone a change in management; (3) the past two managers were fired for performance and conduct related issues, and (4) the operation is inherently high risk, in that it reflects on the City's ability to humanely manage its animal population.

The objective of the audit was to assess select Animal Service's policies and practices as they compare to best practices recommended by national and state organizations, and adopted by other local government animal shelters. The purpose of the audit is to provide interim management and permanent management guidance on improving shelter operations going forward.

Background

The concept of animal shelters in the United States has evolved significantly over time, most dramatically in the latter half of the 20th century. Once colloquially referred to as dog pounds, early-to-mid 20th century animal shelters were little more than holding facilities for stray and abandoned animals waiting to be killed or worse, farmed out to pharmaceutical companies. By the decade of the 1960s, the nation's animal shelter kill-rate had reached 100 cats and dogs per 1,000 people, according to the Humane Society. The trend peaked at 115 per 1,000 in 1970, a year in which an estimated 23.4 million cats and dogs were euthanized in the nation's shelters.

Had the mid-20th century trend continued on its linear path into the 21st century, the number of animals euthanized annually in the nation's animal shelters would be approaching a staggering 35 million. By 2008, however, the number of animals euthanized had fallen precipitously to approximately 3.7 million nationwide, according to American Humane.[1] By 2016, euthanasia figures had fallen further to approximately 1.5 million, according to the American Society for the Prevention of Cruelty to Animals (ASPCA).

The reason for this dramatic downturn in euthanasia rates can be attributed to several milestone developments over the past four decades, which are credited with reversing the rising tide in animal shelter euthanasia rates. These include the awareness-raising "no-kill" movement, the implementation of trap-neuter-return (TNR) programs for feral cat populations, the microchipping of pets, and most importantly the national trend in spay/neuter programs.

Spay/Neuter Programs

The first low-cost spay/neuter clinic opened in the City of Los Angeles, in 1971, according to the Humane Society. Private veterinary practitioners soon followed suit in what became a growing national trend in the practice of pet sterilization. In the 1990s, spay/neuter programs evolved from primarily voluntary to mandatory, where some state and local governments enacted legislation requiring animal shelters to spay or neuter pets in their care before being released to their new owners. This is the case with Texas state law.[2]

Spay/neuter programs have been credited with sharply reducing shelter intake numbers since their inception. Indeed, spay-neuter programs implemented in the New England States, Maine in particular have been so successful at reducing intake that the region now takes in at-risk animals from overcrowded shelters in other states.

The reduction in intake has resulted in a commensurate decline in euthanasia rates, or conversely a commensurate rise in live release rates. In fact, multiple studies have concluded that it is the reduction

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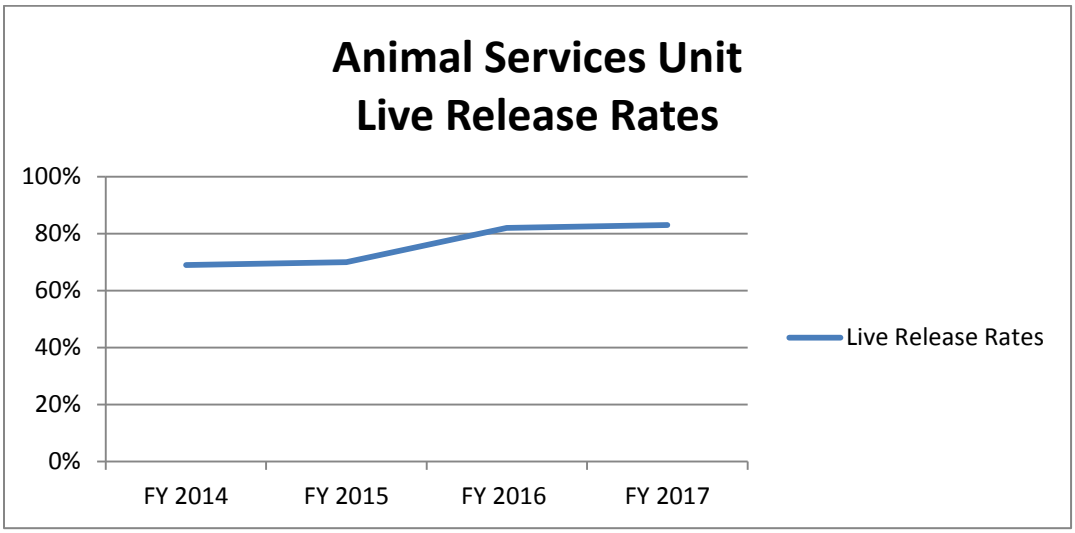
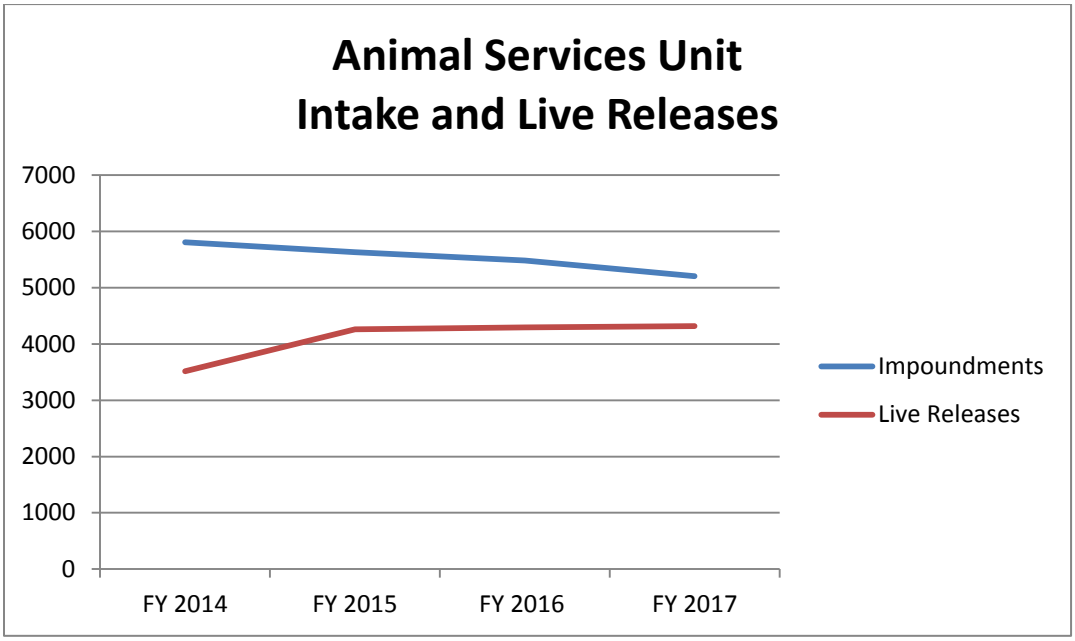
[1] Founded in 1877, the mission of American Humane is to prevent cruelty, abuse, neglect, and exploitation of children and animals.

[2] Texas Health and Safety Code, Title 10, Chapter 828, Section 828.002 "Requirements for Adoption" states "… a releasing agency may not release a dog or cat for adoption unless the animal has been sterilized or the release is made to a new owner who signs an agreement to have the animal sterilized."

in intake more so than adoption — which tends to remain fairly stable — that has driven euthanasia rates down over the past 40 years. Killeen Animal Services' own data appear to support this conclusion. As shown in the graphs below, aside from an uptick in FY 2015, live releases from FY 2014 through FY 2017 remained relatively steady. However, intake numbers showed a steady decline over the same period, resulting in a commensurate climb in the live release rate, which peaked at 83 percent for FY 2017. The uptick in FY 2015 was due to an increase in return-to-owner numbers following Animal Services' implementation of microchipping in March 2015.



Source: Annual Budget



Source: Annual Budget

Peter Marsh, Co-founder of Solutions to Overpopulation of Pets, noted in his book, "Getting to Zero," that the reduction in shelter intake due to spay/neuter programs has helped reduce shelter euthanasia rates by 80 percent since their inception in the early 1970's.[3]

The "No-Kill" Movement

The term "no kill" refers to an animal shelter that does not euthanize healthy or treatable, adoptable animals. In general, shelters that maintain a live release rate of 90 percent or greater are deemed to have attained "no-kill" status.[4] The "no-kill" movement's roots can be traced back to the 1980s, specifically to the San Francisco SPCA, under the leadership of Richard Avanzino. Considered to be the father of the "no-kill" movement, Avanzino instituted a number of reforms in his 20+ year tenure as SF SPCA Director that transformed the agency from a veritable pet slaughterhouse to a modern-day, "no-kill" shelter. In 1994, Avanzino established an adoption pact with San Francisco Animal Care & Control, agreeing to take all adoptable animals offered by the agency. According to the SPCA, that pact helped transform San Francisco into the first "no-kill" city in America.

Trap-Neuter-Return Programs

Trap-Neuter-Return (TNR) refers to a population control strategy for managing free roaming cat colonies. These cat colonies are generally comprised of feral cats, and lost or abandoned household pets. The practice involves trapping cats in a particular colony, getting them spayed/neutered and vaccinated, then returning them to their respective colonies with a "tipped" earmark to designate their altered status. The practice has been credited with stabilizing and ultimately reducing feral cat populations where it has been effectively employed.

TNR programs have been around for decades, dating back to the middle of the 20th century.[5] The programs came into being in response to the now largely discredited trap-and-kill approach to controlling free-roaming cat populations. In 1983, British Biologist,

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[3] Marsh, Peter. *Getting to Zero: A Roadmap to Ending Animal Shelter Population in the United States*. Concord, NH: Town and Country Reprographics, 2012, page 18.

[4] The live release rate, per the Asilomar Accords, is determined by the following formula: Total Live Outcomes/Total Outcomes, where Total Live Outcomes = Adoptions + Outgoing Transfers + Return To Owners), and Total Outcomes = Total Live Outcomes + Euthanasia (excluding owner requested euthanasia and animals that died in shelter care).

[5] Berkeley, Ellen Perry. *TNR Past Present and Future: A History of the Trap-Neuter-Return Movement*. Bethesda, MD: Alley Cat Allies, 2004, pages 1 and 38.

Roger Tabor coined the term "vacuum effect" to explain the unintended consequences of trap-and-kill. The "vacuum effect" refers to the phenomenon, wherein other free roaming cats are drawn into the void created when a cat population is cleared from a particular area. The end result is a continuous cycle of trapping and killing that is neither effective nor humane.

TNR programs gained popularity in the United Kingdom and continental Europe in the 1960s and 1970s, and can now be found under one name or another in countries around the globe, including Denmark, Portugal, Greece, Israel, South Africa, Australia, China, and the Galapagos Islands. In the United States, TNR programs began to take hold in the 1980s and 1990s, among them San Francisco's "Feral Fix Program," which began in 1993 and became a role model for other programs across the country. TNR programs are now commonplace throughout the country, on college campuses, hospital grounds, factory sites, and in gated communities and business districts.

More recently, "Barn Cat" programs, a close cousin of traditional TNR programs have begun to take root across the country. Barn Cat programs target feral and semi-feral cats who cannot be returned to a particular community and are not suited for traditional adoption. Shelters and rescue organizations attempt to relocate these cats to barns, warehouses or other privately owned areas, where individuals will provide safe harbor for the cats. As natural predators, the cats are beneficial to the owners in controlling rodents and other pest populations.

The practice of TNR is not without its detractors. The Wilderness Society views feral cats as an invasive species that threatens the balance of local ecosystems, and supports the euthanasia of unadoptable free roaming cats. People for the Ethical Treatment of Animals (PETA) also oppose TNR and support euthanasia for unadoptable free-roaming cats. Nevertheless, there is a growing body of evidence supporting the efficacy of TNR programs as an effective, efficient, and humane approach to population control.

Microchipping

The practice of implanting microchips in pets for identification purposes began in the 1990s and has gained traction since, as animal services agencies have incorporated the practice into the adoption process. The use of these microchips has been credited with increasing the reunification of owners and lost pets. According to a study published in the Journal of the American Veterinary Medical

Association, more than 52 percent of microchipped dogs and 38 percent of microchipped cats are returned to their owners, as compared to return rates of 22 percent and 2 percent, respectively for lost dogs and cats without microchips.

Asilomar Accords
The Asilomar Accords are named for the California State Beach and Conference Grounds, which hosted the 2004 conference of leading members of the animal welfare community. The purpose of the conference was to develop a comprehensive strategic approach to reducing the euthanasia of healthy and treatable companion animals in the U.S.

One of the benefits of the Accords was the establishment of a set of agreed-upon definitions and performance measures, by which animal shelters could uniformly measure their efforts. This included a standardized formula for calculating a shelter's live release rate, which is used to determine a shelter's status as a "no-kill" operation.

Killeen Animal Services Unit

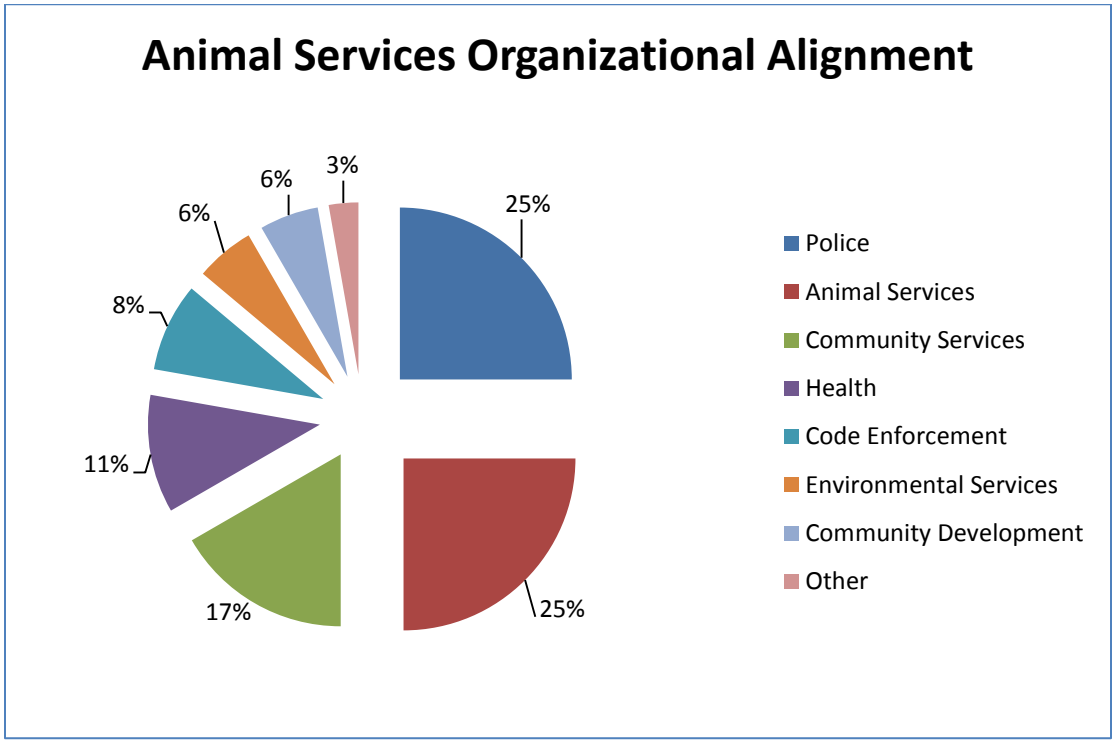
The mission of the Killeen Animal Services Unit is to administer animal regulations and promote responsible pet ownership. Its core mission elements include: (1) animal code compliance; (2) stray animal population control; (3) in-custody animal care; (4) pet adoption promotion; and (5) rabies control.

As reflected in its mission elements, the unit's mission comprises both a public safety and a community service-oriented aspect to its operation. On the public safety end, Animal Services is charged with protecting the public from dangerous animals, as well as protecting animals from dangerous humans. On the service-oriented end, Animal Services is charged with taking in and caring for lost, abandoned, and stray pets, and facilitating the return to their owners, their adoption, or their transfer to non-profit rescue organizations.

To achieve its mission the City's FY 2018 Adopted Budget authorized 16 positions for the Unit, including an Animal Services Manager, Field Supervisor, Animal Control Officers (5), Animal Control Assistants (3), and a Veterinary Technician.

<u>Organizational Alignment</u>
The Killeen Animal Services Unit currently falls organizationally under the Killeen Police Department, where it has been since 2005. As of

August 2018, the City Manager announced his intent to transfer Animal Services from the Police Department to the Community Services Department. This is not an unusual move based on a review of city shelters in the State of Texas, which showed that municipal animal shelters are often located in departments other than the police department, as shown in the graph below.



Source: U.S. 2010 Census and City Websites

Of the 36 cities in Texas with populations of 100,000 or greater, 9 of those cities, or 25 percent had animal services aligned under their respective police departments. [6] Another 25 percent operated as their own department. The next most frequent alignment was under community services at 17 percent, followed by community development at 11 percent, and code enforcement at 8 percent.

Adoption Process

The Animal Services Unit adoption process follows State law, which allows for the conditional release of unaltered animals via an adoption contract. Animal Services will attempt to spay or neuter pets prior to adoption to the extent that time and resources allow. However, in general Animal Services relies upon the adoption contract mechanism to achieve compliance with State law. The adoption contract requires

[6] Based on 2015 and 2016 U.S. Census population estimates.

the new owner to provide proof of sterilization, rabies vaccination and microchipping within a specific timeframe. Animal Services instituted micro-chipping for adoptable animals in FY 2015, so new owners normally must only provide proof of sterilization and vaccination. Once proof is provided, the adoption contract is considered complete.

However, if the new owner fails to meet the terms of the adoption contract by the date(s) specified, a cycle of non-compliance is initiated, which begins with a phone call from Animal Services, and may ultimately end in an arrest warrant being issued. Generally, the process is as follows:

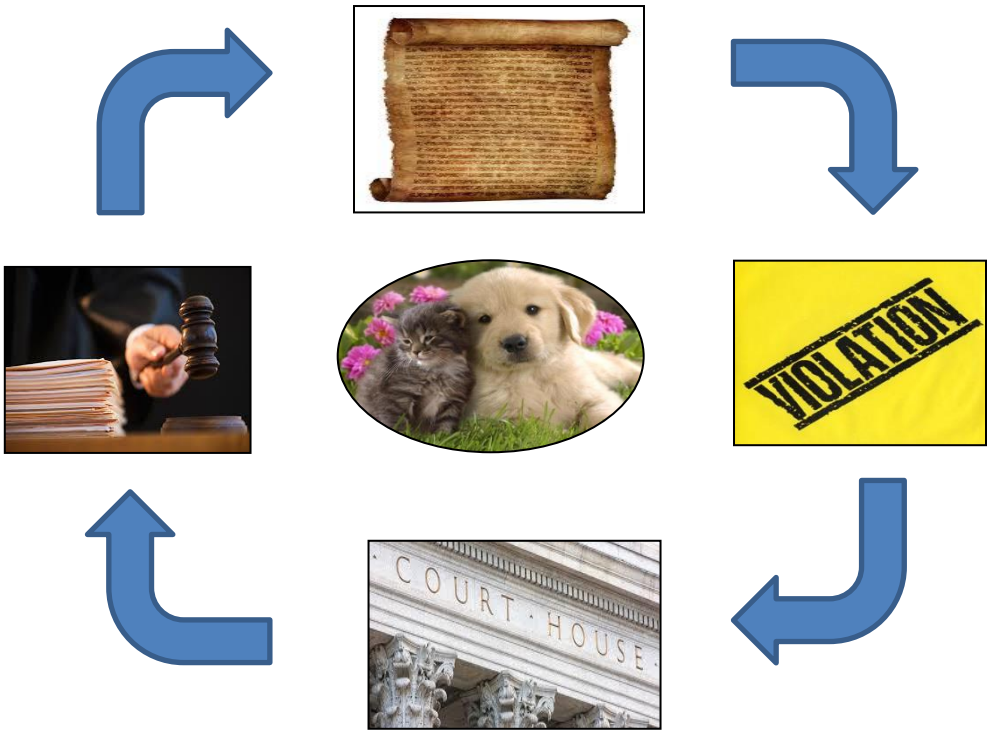
- Courtesy Phone Call: Animal Services staff calls the new owner prior to issuing a citation and gives the owner a grace period, usually a week to submit the necessary documentation.

- Citation: If the owner still fails to act, an Animal Control Officer issues a citation for each contract violation, i.e., failure to sterilize, failure to vaccinate, and failure to microchip are considered separate violations.

- Court Summons: Animal Services mails the citation(s) to the owner and forwards a copy to Municipal Court. The Clerk of the Court then prepares and mails out an arraignment notice, notifying the owner of their scheduled court appearance date.

- Resolution: There are any number of possible outcomes to the non-compliance cycle, including, but not limited to the following:
    - The owner may opt to pay a fine in lieu of a court appearance, which closes out the case. However, the underlying non-compliance issue remains open, and Animal Services may choose to issue another citation, re-initiating the non-compliance cycle.
    - The owner may produce the necessary documents for the court, resulting in dismissal of the case. Under such circumstances Municipal Court will close the loop with Animal Services to close out the contract.
    - The owner may request payment of a reduced fine due to financial hardship, which again, will close out the case, but not eliminate the underlying non-compliance issue.
    - The owner may fail to appear, in which case an arrest warrant may be issued.

Adoption Contract: Cycle of Non-Compliance



Euthanasia

Texas state law requires that a person may euthanize a dog or cat in the custody of an animal shelter only by administering sodium pentobarbital. Animal Services uses the first two of the following three methods of delivery of the drug:

1) Intravenous (IV) Injection: The State considers intravenous injection by hypodermic needle to be the preferred method of administration. Since the drug is injected directly into the vein, death typically follows within seconds.

2) Intraperitoneal (IP) Injection: Intraperitoneal injection refers to the injection of the drug directly into the animal's abdominal cavity. With the IP method, death takes longer to occur, about 8 minutes, according to the Humane Society Euthanasia Reference Manual, although the time to loss of consciousness is about two minutes. This is assuming the proper dosage is used, which is generally three-times the dosage required for an IV injection. When administered properly, through the animal's ventral midline, the IP injection is painless, according to the Humane Society Euthanasia Reference Manual.

   While IV injection is the preferred method of administration for euthanasia, there are some instances, in which it is either not practical, or not the most humane. Such is the case when dealing with highly dangerous or fractious animals, or very small animals, such as small kittens, where a prolonged "hit and miss" search for a suitable vein could cause significant pain and distress for the animal. Under these circumstances, both the Humane Society and the American Veterinary Medical Association (AVMA) consider Intraperitoneal to be the preferred, and in some cases, the more humane method of delivery. However, both the Humane Society and AVMA recommend the use of pre-euthanasia drugs when using the IP method on dangerous or fractious animals, not only to relieve anxiety and pain in the animal, but to reduce safety risks for employees involved in the process.

3) Intracardiac (IC) Injection: Intracardiac injection involves the injection of sodium pentobarbital directly into the heart. The injection is excruciatingly painful, and therefore must be used in conjunction with a pre-euthanasia drug to render the animal unconscious beforehand. Animal Services does **not** use the IC injection method for euthanasia of shelter animals.

Needs Assessment

In 2016, the Police Department commissioned Shelter Planners of America to conduct a "needs assessment" based on its review of the City's Animal Services Complex. The overall conclusion of the assessment was that the structural deficiencies of the current facilities were such that either significant renovation or a new facility would be required to meet current design standards for animal shelters. Shelter Planners of America estimated the cost of a new facility at approximately $10 million, at the time of the study.

The needs assessment also noted several non-structural deficiencies that appeared to be within the Animal Services' budget to address. These included:

- ASU currently uses residential grade, rather than commercial grade washers and dryers.
- The HVAC system in the cat area, at the time of the review did not meet modern standards designed to limit exposure to respiratory and other illnesses.
- Cat cages provide only one compartment. The Association of Shelter Veterinarians recommends multi-compartment "condo" type cages.

Statement of Compliance with Audit 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 objective.

FINDINGS AND RECOMMENDATIONS

Under interim leadership, the Animal Services Unit has shown marked improvement; however, policy and operational impediments may hinder Animal Services' ability to sustain its improved performance.

The Killeen Police Department's Animal Services Unit has shown significant improvement under the Department's Staff Services Division's interim leadership. This is evidenced by the monthly live release rates, which have remained cumulatively above 90 percent during the Division's tenure, up from 83 percent in FY 2017. In addition, interim management has made progress in addressing several of the facility's longstanding non-structural, operational deficiencies. This includes initiating procurement of a commercial grade washer and dryer; replacing the current kennel-cleaning system; re-installing air purifiers to meet manufacturer's recommendations; and purchasing a commercial grade dishwasher to replace the current manual operation. On the whole, these actions, once fully implemented should improve both the efficiency and effectiveness of the operation. Finally, interim management has made a concerted effort to reach out to non-profit groups, in particular those involved in the placement of feral cats as "barn cats," which has helped to maintain the shelter's improved live release rate.

Despite these improvements, policy impediments persist that may undercut Animal Services' ability to sustain live release rates at the "no-kill" level. A key component of increasing live release is reduction of animal intake through aggressive and proactive spay/neuter practices. However, Animal Services spay/neuter practices allow for the conditional release of unaltered animals under adoption contracts, which are neither efficient, nor effective at achieving compliance with state spay/neuter laws. Further, Animal Services has yet to develop a viable TNR program, in coordination with local non-profit groups and community cat caregivers to effectively control the City's feral cat population. Finally, Animal Services has yet to develop a comprehensive marketing strategy, in coordination with the Communications Department to fully utilize traditional and social media to increase adoptions by maximizing outreach for promotion activities.

Management Improvements

In March 2018, the Chief of Police designated the Deputy Division Commander for the Staff Services Division as interim Animal Services Manager, pending the recruitment of a new Animal Services Manager. The previous manager was terminated on February 26, 2018, for engaging in a pattern of unethical and abusive behavior, resulting in a hostile work environment for both staff and volunteers.

In its brief tenure over Animal Services, the Staff Services Division management team has worked to improve the work environment, and has made significant progress in implementing management improvements that taken as a whole should improve both the efficiency and the effectiveness of operation once fully implemented. Management's goal is to implement most of its ongoing projects by the end of the first quarter of FY 2019.

- **Commercial Grade Washer/Dryer**: Interim management conducted research and reached out to local animal shelters to identify a suitable commercial grade washer and dryer system to replace their current residential-sized washer and dryer. The new system once implemented will improve the sanitary environment to help prevent the spread of disease, including the canine parvovirus, which is highly contagious and highly resilient. This improvement will also address one of the non-structural deficiencies identified in the Needs Assessment.[7]

- **Kennel Cleaning System**: Interim management conducted research and reached out to local animal shelters to identify a more efficient and effective cleaning system for its dog kennels. On September 12, 2018, Animal Services submitted a purchase requisition for the new system, which will equip individual kennels with their own pulldown hoses. The new system will be more efficient and more sanitary than the current system, in which a single hose must be dragged along the floor, from kennel to kennel. In addition, Animal Services intends to implement the use of pet-safe, non-toxic cleaning agents. The Facilities Manager for Building & Custodial Services confirmed that the project is underway.

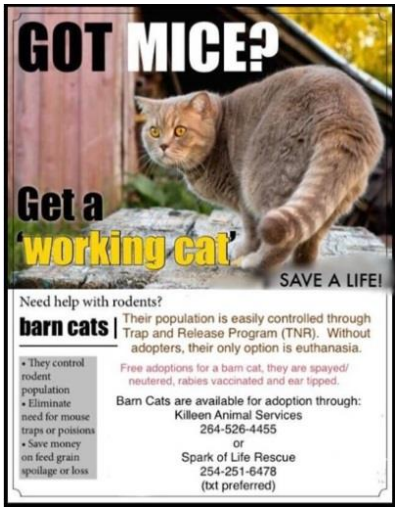
[7] The canine parvovirus infection is a highly contagious viral illness that affects either the intestines or the heart, and is usually found in puppies between six weeks and six months old. The intestinal form is characterized by vomiting, diarrhea, weight loss and lack of appetite. The cardiac form attacks the heart muscles of fetuses and very young puppies, often leading to death.

- **Air Purifiers**: Air purifiers use ionization technology to reduce, among other things airborne viruses and bacteria that can lead to the spread of respiratory infections and other airborne illnesses. By preventing or reducing the spread of disease the purifiers have the added benefit of potential cost savings in the form of reduced medical expenses. The previous manager had purchased air purifiers in 2017, but failed to implement them properly. Manufacturers recommend that in a kennel setting purifiers should be mounted as high as possible, preferably hung from the ceiling. The Facilities Manager confirmed that the project is underway.

- **Commercial Dishwasher**: In addition to a commercial grade washer/dryer, interim management also plans to purchase a commercial dishwasher to replace its manual dishwashing process. According to Veterinary Practice News, many animal shelters use commercial dishwashers, which attain temperatures of up to 180 degrees, and are of considerable value in controlling disease transmission.

- **Multi-Compartment Cat Cages**: As noted in the 2017 Needs Assessment, Animal Services' single compartment cat cages do not align with best practices, which call for multi-compartment "condo" type cat cages to allow for separation of food and the elimination of waste. Interim management indicated plans to address this issue within the fiscal year.

- **Feral Cat Placement as Barn Cats**: Under interim management leadership, Animal Services has made a concerted effort to reach out to non-profits with "Barn Cat" programs to find placement for dozens of feral cats as barn cats that might otherwise have been euthanized. The staff's efforts have been a contributing factor in Animal Service's ability to increase its live release rate. The number of feral cats euthanized during the first eight months of FY 2018 showed a significant decline from FY 2016 and FY 2017.



Additional Management Improvements Required

Despite the improvements implemented or put in motion by the interim management team, policy and operational challenges remain that may undercut Animal Services' ability to sustain its current live release rate. These challenges are discussed below under the general categories of *Intake* and *Outcome*.

Intake

The Animal Services Unit, in its 2017-2018 Business Plan states that it will strive to increase its live release rate "by promoting adoption events and working with rescues to move as many animals as possible out of the shelter and into loving homes." Adoption is an important part of increasing live release rates, but it is only part of the equation.

The Humane Society estimates that there are approximately 70,000 puppies and kittens born each day in the U.S., compared to about 10,000 humans born each day. In addition, there are an estimated 60 to 100 million feral cats roaming the countryside. There are simply not enough humans in households, or humans with barns for the nation's animal shelters to adopt their way to "no-kill" status. A comprehensive strategy for increasing live release rates must focus not only on adoptions, but also on reducing intake. As previously mentioned, the most effective method for reducing animal intake is through proactive spay-neuter programs, be it pre-sterilization for shelter animals, or TNR programs for feral cat colonies. In both areas, Animal Services has opportunities for improvement.

<u>Spay-Neuter Agreements</u>
Animal Services follows State law, which allows for the conditional release of unaltered cats and dogs under an adoption contract. The agreement requires the new owner to provide proof of sterilization within a specified timeframe. The adoption contracts are expedient, allowing Animal Services to move cats and dogs from cages and kennels into homes relatively quickly.

However, that expediency comes at a significant cost in time and resources devoted to contract compliance. Contract violations are frequent and flagrant, and have drawn resources from Animal Services, Municipal Court, and the City Attorney's Office into a continuous cycle of phone calls, citations, court summonses, and court appearances. Animal Control Officers alone spend hundreds of hours

collectively each year just writing citations. This does not include the hours spent adjudicating the violations by the Clerk of the Court, the Assistant Clerk of the Court, the Assistant City Attorney-Prosecutor, the City Marshal, and the Municipal Court Judge.

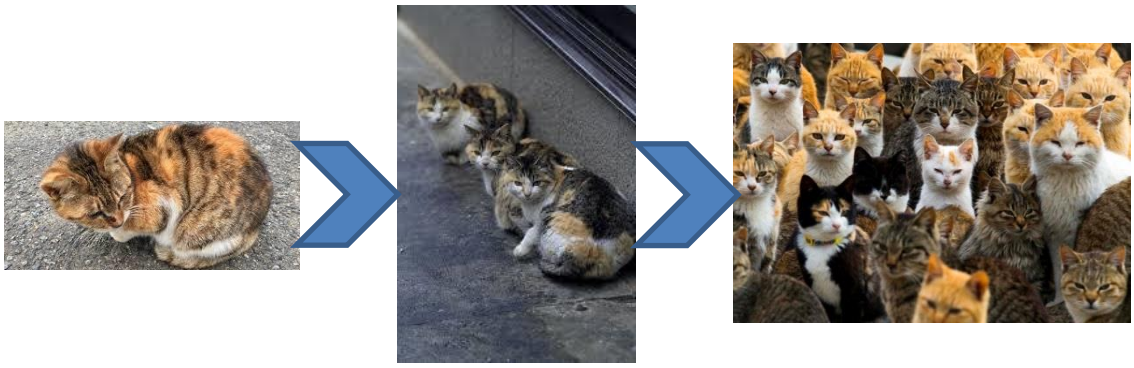
From 2010 through 2017, Municipal Court processed over 5,000 failure-to-sterilize violations, averaging about 600 per year, for a contract failure rate of about 30 percent, based on adoption data. Violations peaked at over 800 in 2015, a year in which total contract violations (failure to sterilize, vaccinate, and microchip) accounted for 40 percent of the Municipal Court's docket caseload. On average about 20 percent of the docket caseload is devoted to contract violation issues. In total, Municipal Court processed over 14,000 contract violations from 2010 through 2017. Each violation represents a phone call that must be made; a citation that must be written, recorded and mailed; an arraignment letter that must be typed by the Clerk of the Court and mailed; a hearing that must be scheduled; and in some instances, a court trial that must be held.

More important than the diversion of scarce resources, however, is the fact that the administratively burdensome compliance process may fail to achieve the main purpose of the contracts, i.e., to ensure compliance with the State's spay/neuter law. Animal Services staff acknowledged that some pet owners have indicated they did not intend to spay or neuter their newly adopted pet, even when provided with vouchers to cover the cost of surgery. A local veterinarian confirmed at least one instance where a pet owner used a voucher to cover a rabies vaccination, but declined to have his dog sterilized.

Common objections a pet owner may have to sterilization, according to the Humane Society, include the mistaken belief that it alters the pet's personality, or that it is better to allow a female pet one litter before spaying, also a mistaken belief. Others may have a financial incentive. An unaltered female Blue Nose Pitbull, for example, could mean thousands of dollars in puppy sales to a would-be pet owner. Under such circumstances, court fines would not serve as a serious deterrent.

It should be noted that the majority of pet owners cited will ultimately comply with the terms of their adoption contract. However, even a relatively small number of unaltered animals could have a significant impact on the local animal population. Just one lost or abandoned

unaltered female cat could potentially result in dozens, even hundreds of cats being added to the free-roaming cat population.[8]



It is little wonder then that local government shelters are eschewing the use of contracts as a compliance tool and adopting the best practice of pre-sterilization. At present the Williamson County Animal Shelter, El Paso Animal Services, Waco Animal Services, and most recently the Harker Heights Pet Adoption Center are among local government shelters that have adopted the practice of pre-sterilization, whereby all dogs, cats, puppies, and kittens are spayed or neutered **before** they are released for adoption.

Pre-Sterilization

The American Society for the Prevention of Cruelty to Animals (ASPCA), the National Animal Care & Control Association (NACA), and the Texas Animal Control Association (TACA) all recommend pre-sterilization of adoptable animals as a best practice. The greatest long-term benefit to this more proactive approach would be a reduction in intake, which in turn would lead to a decline in euthanasia rates, based on historical data. As previously mentioned, such proactive spay-neuter programs enacted over the past two decades in the State of Maine have been so successful that the State's shelters now take in at-risk animals from overcrowded shelters in other states. In the short-term, the City would reap the more immediate benefits of pre-sterilization, specifically, freeing up the time and resources in Animal Services, the City Attorney's Office, and Municipal Court staff currently dedicated to contract compliance. Finally, in addition to the reduction in intake, and relief from the administrative burden of contract compliance, pre-sterilization is a public safety issue.

[8] A female free-roaming cat has an average of 1.4 litters per year, with an average of 3.5 live births.

According to the American Veterinary Medical Association, one of the most common factors associated with reported dog attacks on humans is the unaltered status of the dogs involved.

The City Auditor recognizes that implementing a policy of pre-sterilization will be challenging for Animal Services, especially with regard to puppies and kittens. It will require time and effort to build up a reliable network of foster caregivers to take in puppies and kittens that are not old enough for spay/neuter surgery. In the interim, at a minimum, Animal Services should develop a pre-sterilization plan for adult dogs and cats to be achieved within a reasonable timeframe.

TNR Program

In 2009, the City of Killeen amended its Code of Ordinances, Chapter 6 to include a section on controlling the City's feral cat population by making lawful the practice of TNR. The City was years ahead of many local governments, some of which are only now enacting such legislation. However, nearly 10 years after enactment, the City has relatively little to show for its legislative efforts other than a handful of registered cat colony managers, representing what Animal Services staff and non-profit groups both agree are a small fraction of the City's community cat caregivers.

The main problem lay in the fact that the City never followed through on its legislation to fully develop a viable TNR program in partnership with local non-profit organizations. It should be noted that Animal Services, under Staff Services interim management has begun reaching out to some local non-profit groups to find homes for feral cats as barn cats, which is a positive step. For the most part, however, Animal Services has yet to develop and implement a proactive approach to feral cat colonies designed to educate the community on the practice and benefits of TNR, and to create the cooperative environment necessary for a TNR program to succeed.

Indeed, visitors to the City's Animal Services website would not be aware that the City even endorses the practice of TNR unless they were to "drill down" and scroll through the City's Code of Ordinances. The website makes no mention of feral cats, makes no mention of TNR, provides no links for caregivers seeking information on where to find training on trapping feral cats, provides no information on veterinarians who provide low-cost spay-neuter services for feral cats, and provides no information on how and why colony managers should register with Animal Services.

By contrast, El Paso Animal Services and the Williamson County Animal Shelter both devote entire webpages to the subject on their respective websites that provide useful information for community cat caregivers. The City of El Paso has gone a step further by partnering with Sun City Cats, a regional TNR advocacy group that works as a liaison between community cat caregivers and the city shelter. These agencies, El Paso Animal Services in particular provide useful models for Killeen's Animal Services Unit in developing a viable TNR program.

Another, albeit lesser problem lay in the ordinance's bureaucratic, compliance provisions that may deter citizens who might otherwise register. Registrants must provide annual reports as to the number of cats per colony, the number of cats sterilized and vaccinated, and the location of veterinary clinics used. In addition, registrants must show proof of sterilization for at least 50 percent of the unaltered cats in each colony. Animal Services staff acknowledged that the reports provide no real value, and can be easily falsified. Since the program's performance can be more effectively measured by changes in intake levels for feral cats and kittens, management should seek Council approval for an amended Ordinance that eliminates these reporting requirements.

Outcome

Outcome refers to the final disposition of animals passing through Animal Services' facilities, and could be either positive or negative. Positive outcomes include lost pets returned to their owners, animals adopted, or animals transferred to rescue groups. Negative outcomes include animals that die in custody due to injury or illness, unadoptable animals euthanized due to behavioral issues, and adoptable animals euthanized due to lack of space. While it is not stated as such, one can infer from Animal Services mission elements that a goal is to maximize positive outcomes, in order to minimize negative outcomes, in particular the euthanasia of adoptable animals.

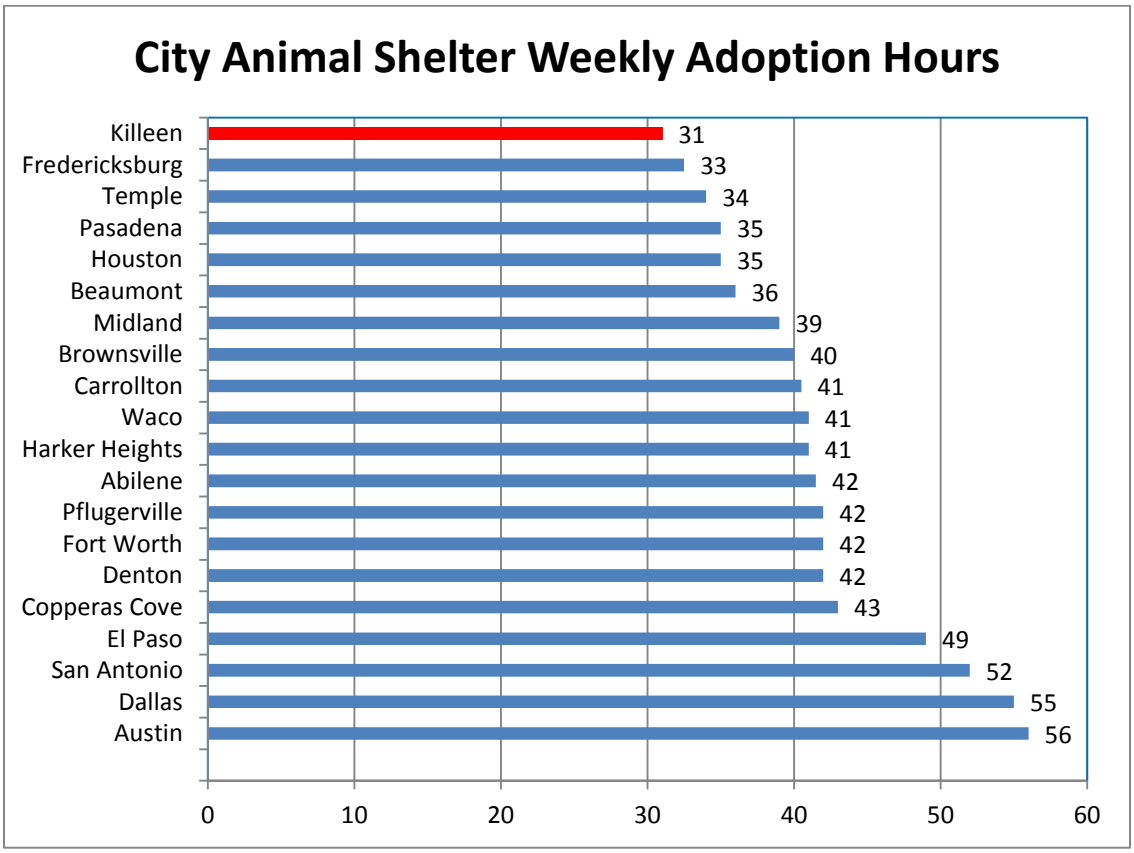
<u>Comprehensive Marketing Strategy</u>
The Humane Society Best Practices Guide defines marketing as "using strategies and tactics that help you build relationships with supporters and fulfill your mission." Much of what Animal Services currently does to increase positive outcomes involves the basic elements of marketing, e.g., offering free adoptions, showcasing the "Pet of Week," partnering with the local PetSmart store to showcase adoptable animals, uploading photos of animals to the Animal Services website,

posting updates to the department's Facebook page, and most recently, extending available adoption hours on Thursdays.

However, Animal Services' approach tends to be somewhat reactive in nature driven primarily in response to periods of high occupancy at the shelter. This is understandable given that Animal Services has neither the staff nor the budget for a full-time marketing coordinator. In order to compensate for its lack of resources in this area, Animal Services needs to be more proactive in reaching out to the City's Communications Department for assistance in developing and implementing a more comprehensive and proactive approach to marketing its services and activities.

Extended Hours Pilot

For example, Animal Services in September launched an extended-hours campaign to help alleviate overcrowded conditions at the shelter. Adoption hours on Thursdays were extended from 4:00pm to 7:00pm. This is a positive step in the right direction, given that Animal Services ranked among the least available in terms of overall adoption hours, as shown in the chart below.



In addition, its 11:00am to 4:00pm weekday adoption window ranked among the narrowest, based on a review of animal shelter operations selected from regions across the State. As shown in the following chart, most agencies remain open at least until 5:00pm on weekdays, with many staying open until 6:00pm or 7:00pm.

City	Animal Shelter Weekday Adoption Hours
Copperas Cove	9:00AM - 5:00PM
Fredericksburg	9:30AM - 4:00PM
Midland	9:30AM - 5:30PM
Temple	10:00AM - 4:00PM
Carrollton	10:00AM - 5:00PM
Denton	10:00AM - 5:00PM
Beaumont	10:00AM - 5:30PM
El Paso	10:00AM - 6:00PM
Abilene	10:30AM - 6:00PM
Killeen	11:00AM - 4:00PM
Pasadena	11:00AM - 5:00PM
Pflugerville	11:00AM - 6:00PM
Waco	11:00AM - 6:00PM
Austin	11:00AM - 7:00PM
Dallas	11:00AM - 7:00PM
San Antonio	11:00AM - 7:00PM
Houston	Noon - 5:00PM
Ft Worth	Noon - 6:00PM
Brownsville	1:00PM - 7:00PM
Harker Heights	1:00PM - 7:00PM

By closing at 4:00pm, Animal Services loses out on potential adoptions from the City's working class, or at least those who work a traditional 9-to-5 work week. Agencies with extended hours that were contacted all indicated that the 4:00pm-to-6:00pm time slot was by far their busiest time of day with regard to adoptions.

Animal Services reported that the Thursday extended hours were a moderate success, resulting in some additional foot traffic. However, Animal Services did not coordinate with the Communications Department on the launching of the pilot program. As a result, there was no mention of the extended hours on the City website, on the Animal Services website, or on the City's Facebook page. The Police Department did post an update on Animal Services' extended hours to its own Facebook page on Thursday, September 6, 2018.

The Communications Department highlighted animal adoptions in its September 12, 2018, broadcast of "Good News Killeen," but because the Department had not been notified of the extended-hours pilot, that information was not included in the broadcast. The Communications

Department did, on its own initiative, subsequently include a segment on the shelter's extended-hours pilot in its October 10, 2018, broadcast of "Good News Killeen." A proactive marketing strategy would dictate the need to coordinate such events in advance with the Communications Department to ensure maximum outreach to the shelter's intended audience.

Social Media

Social media encompasses a broad and rapidly changing landscape of social media platforms too numerous to cite here. However, Facebook with its billions of users is the dominant social media platform for the moment. Currently, Killeen's Animal Services Unit remains one of the few local government shelters without its own Facebook page.

The lack of its own social media outlet is mitigated to some extent by Animal Services' use of the Police Department's Facebook page, as well as the City's Facebook page, which reaches an even larger audience in terms of the number of "shares" garnered by its posts.[9] In addition, Animal Services staff makes use of Facebook pages of non-profit groups to post updates and alerts when the shelter is at or near capacity, although it must compete for attention with other local shelters on these pages.

As with the failure to coordinate with the Communications Department on its extended-hours pilot, the under-utilization of social media reflects the need for a more proactive marketing strategy on the part of Animal Services, preferably in coordination with the Communications Department.

That being said, the City Auditor does not recommend creating a Facebook page just for the sake of having a Facebook page. As previously mentioned, Facebook is a social media platform; it is not a substitution for a marketing strategy, which should focus not on a specific platform, but rather on how social media is to be used to promote the agency's activities. This includes, but is not limited to: (1) what content should be included; (2) who is responsible for monitoring and updating the content; (3) how often; (4) how do you ensure consistency in the quality and accuracy of content; and (5) how do you prevent or respond to inappropriate or misleading content.

Further, while Facebook is the dominant platform at the moment, marketing research indicates that Millennials are abandoning Facebook in droves in search of "hipper" platforms, such as Instagram and YouTube. [10] The post-Millennial generation will in all likelihood have even less use for the now dominant social media platform. Animal Services should develop a comprehensive marketing strategy in coordination with the Communications Department that focuses on managing message content and delivery, which can then be adapted to the appropriate social media platform.

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[9] PC Magazine defines social "sharing" as sending photos, videos, product recommendations and website links to friends with social networking accounts.

[10] Demographers William Strauss and Neil Howe are credited with coining the term "Millennial Generation," which refers to the children of "Baby Boomers" and "Gen Xers" born between 1982 and 2004.

Promotional Activities

Animal Services under Staff Services interim management has made a concerted effort to increase adoptions through promotional activities, including free adoptions, pet of week designation, extended adoption hours, and participation at events, such as the City's 2018 Celebrate Killeen Festival. In addition, the shelter has coordinated with volunteers to host holiday events at the shelter, which include displays of artwork created by children from the Boys and Girls Club of Central Texas.[11]

There is no one-size-fits-all approach to marketing animal shelters. What may work well for one shelter, in a particular demographic may not work for another. However, certain activities have proven successful for other shelters at raising awareness, engaging the public,

[11] Photo of Halloween tree provided courtesy of Killeen Animal Alliance.

and raising funds that Animal Services should consider. These other promotional activities include: (1) kennel sponsorships; (2) children read aloud programs; and (3) adoption biographies.

Kennel Sponsorships: Kennel sponsorship programs have been adopted by both governmental and non-profit shelters, as a means for raising funds, and engaging the community as a stakeholder in the operation. The sponsorships offer a more personalized approach to fundraising, in which individuals or organizations can donate funds to the animal shelter in exchange for a personalized plaque placed on a designated kennel, as shown in the photo to the right from the Muskegon Humane Society. Sponsorships usually range anywhere from $100 to $1,000, depending on the length of time the plaque will hang on the kennel or cage. The sponsorships have the potential to raise thousands of dollars.

Children Read Aloud to Shelter Animals: Shelter reading programs gained national notoriety when the Humane Society of Missouri launched its "Shelter Buddies Reading Program" in early 2016. The program was highlighted in "USA Today" and picked by other national media outlets in conjunction with "National Read Across America Day."

The program touts three major goals: (1) encourage empathy and compassion in children; (2) help comfort shy, fearful dogs and ease their anxiety; and (3) get shelter dogs adopted more quickly. According to the Shelter Buddies Reading Program guide, the program increases animals' chances for adoption through positive interactions with the readers that in turn makes the animals more willing to approach the front of the kennel and interact with potential adopters.

Adoption Biographies: Adoption biographies serve to improve an animal's chance for adoption by highlighting the animal's backstory and its individual personality traits, e.g., playful, shy, sweet, good on a

leash, likes belly rubs, good with children and other animals, knows how to shake hands and sit, etc. Both the Williamson County Animal Shelter and Texas Humane Heroes provide adoption biographies on their respective websites. The individualized biographies are in line with the current best practice trend in non-profit shelters toward downplaying breed labels, and focusing more on an animal's individual qualities as an animal companion. Animal Services already provides a brief bio when highlighting its Pet of Week. This would simply take it a step further by providing adoption biographies for all of its adoptable animals.

Conclusion

Animal Services has shown marked improvement under Staff Services Division's interim management. Under its brief tenure, live-release rates have increased and remained cumulatively above 90 percent. Further, a number of projects have been initiated that should improve the overall efficiency and effectiveness of the operation, once fully implemented. These include the purchase of a commercial grade washer and dryer, purchase and installation of a new kennel cleaning system, purchase of a commercial grade dishwasher, purchase of multi-compartment cat cages, and reinstallation of air purifiers. Finally, Animal Services staff has made a concerted effort to reach out to local non-profit groups with "Barn Cat" programs to find homes for feral cats that would otherwise have been euthanized.

However, in order to ensure that the gains it has made are sustainable in the long-term, Animal Services needs to take a more strategic approach to managing shelter operations that focuses on reducing intake, as well as increasing positive outcomes. Reducing intake will require proactive spay/neuter policies and practices, specifically, pre-sterilization for all shelter animals. This will have the added benefit of freeing up resources in Animal Services, the City Attorney's Office, and Municipal Court currently dedicated to adoption contract non-compliance issues. Reducing intake will also require a more proactive approach to feral cats by partnering with non-profits and community cat caregivers to develop and implement a more robust TNR program to help stabilize and reduce the City's feral cat population. Increasing positive outcomes will require a more proactive approach to marketing Animal Services, in coordination with the Communications Department to ensure that Animal Services harnesses both traditional and social media to the greatest extent possible for its adoption promotion activities.

Recommendation:

The City Auditor recommends the Executive Director to:

1. Continue implementing improvements identified in this report and provide an update to the City Auditor on the status of the projects as of December 31, 2018.

2. Develop and implement a plan to spay/neuter, vaccinate, and microchip all adoptable animals before they are released by the shelter, thereby negating the need for adoption contract compliance.

3. Coordinate with the Communications Department on developing a marketing strategy for Animal Services that employs the use of traditional and social media towards achieving its operational goals.

4. Coordinate with the Communications Department on revamping the Animal Services City webpage to include information on feral cat colonies and TNR, including links to non-profit agencies offering guidance and training.

5. Consider submitting to City Council for consideration an amended City Ordinance, Chapter 6, Division 5, Section 6-130 "Proper Management and Sterilization," which eliminates reporting requirements for feral cat colony managers.

6. Revise the Kennel Statistics Report to include separate intake data on feral cats and kittens for the purpose of measuring TNR program effectiveness.

7. Develop a plan, in consultation with other local government shelters and non-profit agencies on implementing a viable TNR program.

OTHER MATTERS

Use of Pre-Euthanasia Drugs

Texas state law requires the administration of sodium pentobarbital for euthanasia of shelter animals. Animal Services does not administer pre-euthanasia drugs when using the intraperitoneal (IP) method of delivery, nor is it required to. However, both the Humane Society and the American Veterinary Medical Association recommend the use of pre-euthanasia drugs when using the IP method on "wild or fractious" animals to relieve any undue pain and anxiety on the part of the animal, as well as to ensure the safety of staff involved in the process. At least one local veterinary doctor has expressed a willingness to work with Animal Services to administer pre-euthanasia drugs when appropriate. Management should take this matter under advisement.

VIEWS OF RESPONSIBLE OFFICIALS

The Chief of Police, the Commander of the Staff Services Division, and the Executive Director of the Community Services Department agreed with the findings and recommendations in the report. In addition, input from the interim Animal Services Manager and Animal Services staff is reflected throughout this report.

APPENDIX A

OBJECTIVES, SCOPE AND METHODOLOGY

Objectives

The objective of the audit was to assess select Animal Services policies and practices as they compare to best practices recommended by national and state organizations, and adopted by other local government animal shelters.

Scope and Methodology

The audit focused on, but was not limited to shelter operations during the period of FY 2014 through mid-June FY 2018.

To address the audit objectives, the City Auditor:

- Met with the Interim Animal Services Manager, Field Supervisor, and select Animal Control Officers and Animal Control Assistants, the Clerk of the Court, Assistant City Attorney-Prosecutor, and Municipal Court Judge.

- Obtained and analyzed Kennel Statistics Reports from Animal Services, and workload data on adoption contract violations from the Clerk of the Court.

- Researched and identified best practices recommended by the National Animal Care & Control Association (NACA), Texas Animal Control Association (TACA), and the American Society for the Prevention of Cruelty to Animals.

- Conducted research on the history of spay/neuter laws, TNR programs, and the "No-Kill" movement.

- Visited or contacted local animal shelters, veterinarians, and non-profit organizations, including the Williamson County Regional Animal Shelter, Harker Heights Pet Adoption Center, El Paso Animal Shelter, Lampasas Animal Shelter, Kathy's Kitties, Texas Vets for Pets, East Lake Veterinary Center, Killeen Animal Alliance, Assisi Animal Refuge, and Spark of Life.

Statement of Compliance with Audit 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 RESPONSE

CITY OF KILLEEN - CITY AUDITOR
Animal Services Unit Audit

Rec No.	Recommendation	Lead Department	Agree/Partially Agree/Do Not Agree/Comment	Estimated Implementation Date
1.	Continue implementing improvements identified in this report and provide an update to the City Auditor on the status of the projects as of December 31, 2018.	Police Department/Community Services	Agree	December 2018
2.	Develop and implement a plan to spay/neuter, vaccinate, and microchip all adoptable animals before they are released by the shelter, thereby negating the need for adoption contract compliance.	Police Department/Community Services	Agree	TBD[12]

[12] The City Auditor did not request from the Police Department an estimated time of completion for the audit recommendations, due to the City's planned transfer of Animal Services from the Police Department to Community Services.

Rec No.	Recommendation	Lead Department	Agree/Partially Agree/Do Not Agree/Comment	Estimated Implementation Date
3.	Coordinate with the Communications Department on developing a marketing strategy for Animal Services that employs the use of traditional and social media towards achieving its operational goals.	Police Department/Community Services	Agree	TBD
4.	Coordinate with Information Technology and Communications on revamping the Animal Services City webpage to include information on feral cat colonies and TNR, including links to non-profit agencies offering guidance and training.	Police Department/Community Services	Agree	TBD
5.	Consider submitting to City Council for consideration an amended City Ordinance, Chapter 6, Division 5, Section 6-130 "Proper Management and Sterilization," which eliminates reporting requirements for feral cat colony managers.	Police Department/Community Services	Agree	TBD

Rec No.	Recommendation	Lead Department	Agree/Partially Agree/Do Not Agree/Comment	Estimated Implementation Date
6.	Revise the Kennel Statistics Report to include separate intake data on feral cats and kittens for the purpose of measuring TNR program effectiveness.	Police Department/Community Services	Agree	TBD
7.	Develop a plan, in consultation with other local government shelters and non-profit agencies on implementing a viable TNR program.	Police Department/Community Services	Agree	TBD