



## **CITY OF KILLEEN**

### **ANIMAL SERVICES AUDIT Progress, Setbacks, and Opportunities Amidst Economic Headwinds**

Audit Report #24-01

#### **A Report to the City of Killeen Audit Committee**

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# EXECUTIVE SUMMARY



## AUDIT REPORT HIGHLIGHTS

### Why Was This Audit Conducted?

The City Auditor proposed this audit to the Audit Committee as part of an ongoing focus on the City's revenue streams.

The City Auditor appreciates the cooperation of the Animal Services Division management and staff on this audit.

## Killeen Animal Services Audit

Mayor and Council,

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

### Objectives

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The objectives of the audit were to: (1) assess the performance of the City's Intergovernmental Support Agreement with the United States to operate the Fort Cavazos Stray Animal Intake Facility; and (2) conduct follow-up on the City Auditor's prior audit of Animal Services in the areas of live release rates, pre-sterilization, and trap-neuter-return (TNR).

### Audit Results

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The City Auditor's audit of the Animal Services division found marked progress in several areas, countered by setbacks in others. The infusion of cash from the Intergovernmental Support Agreement with Fort Cavazos allowed Animal Services to address key long-standing deficiencies raised in a 2016 needs assessment. In addition, the Division has made significant strides to develop a comprehensive marketing strategy, utilizing both traditional and social media. However, the division's progress was off-set by a decline in live release rates, which fell to 66 percent in FY 2023, a factor of rising intake and static adoptions and rescues amidst rising economic inflation. Sterilization rates also declined, and the division's TNR program had largely stalled. Colony managers appeared to have opted out of the program, which needs a paradigm shift away from its compliance-oriented approach towards a best practice approach based on outreach and education. Despite the setbacks, there are opportunities for significant improvement. The purchase of the East Lake Veterinary Center brings with it additional kennel space and the potential for in-house vet clinic capabilities, which should sharply reduce or eliminate the need for space-based euthanasia and ensure that all adoptable animals are spayed or neutered before they are released for adoption.

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## INTRODUCTION

The City Auditor conducted this performance audit of the Killeen Animal Services pursuant to Article III, Chapter 40 of the City Charter, as Amended May 11, 2013, and in accordance with the City Auditor's Audit Plan approved by the Audit Committee on July 18, 2023.

The objectives of the audit were to: (1) assess the performance of the City's Intergovernmental Support Agreement with the United States to operate the Fort Cavazos Stray Animal Intake Facility; and (2) conduct follow-up on the City Auditor's prior audit of Animal Services in the areas of live release rates, pre-sterilization, and trap-neuter-return (TNR).

### Background

In FY 2023 Killeen Animal Services was designated a stand-alone division, reporting directly to the Assistant City Manager. This brought the operation nearly full circle from its time as a stand-alone unit in the early 2000s, reporting then to the now defunct Deputy City Manager position. In the intervening years, Animal Services existed as a division within various departments, most recently the Parks and Recreation Department. At the time of the last audit, Animal Services was under the Killeen Police Department.

The following events are relevant to discussions in the body of the report.

#### *Shelter Planners of America – Needs Assessment*

In 2016, the Killeen Police Department commissioned Shelter Planners of America to conduct a needs assessment for the department's Animal Services Unit. The study concluded that the structural deficiencies of the current facilities were such that either a new facility or wholesale renovation and expansion of the existing facility was necessary to meet the 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 study also concluded that staffing for the operation was less than that of other shelters with comparable animal intake and adoption rates. The study recommended a long-term goal of increasing staff to 31 full-time positions, including 9 animal control officers. At the time of the study, the Animal Services Unit had 18 full-time positions, including 7 animal control officers.

## *Intergovernmental Support Agreement*

In May 2022, Killeen City Council authorized the City Manager to enter into an intergovernmental support agreement (IGSA) with the United States to operate the Fort Cavazos Stray Animal Intake Facility (shelter). Under the agreement, Fort Cavazos outsourced the operation of its shelter to the City of Killeen. The City bills Fort Cavazos monthly for the services provided. In addition to reimbursing the City for personnel and equipment costs required to operate the Fort Cavazos facility, the United States agreed to provide the City funds for additional staffing, equipment, and upgrades at the Killeen shelter.



## *Veterinary Services*

In January 2021, City Council authorized the City Manager to contract with Aztec Pet Hospital for spay/neuter surgery and other veterinary services, not to exceed \$90,000. The purpose of the contract was to facilitate Animal Services in achieving its goal of 100 percent pre-sterilization, i.e., spaying/neutering all adoptable animals before they are released for adoption. Due to workload issues related to the vet clinic's capacity at the time, Animal Services chose to rebid for its veterinary services.

In November 2021, City Council authorized the City Manager to contract with Texas Humane Heroes for spay/neuter and other veterinary services not to exceed \$97,500 annually. Texas Humane Heroes is a private, non-profit animal adoption center and veterinarian clinic headquartered in Leander, Texas. At the time of the contract, Texas Humane Heroes maintained a second location in Killeen on Clear Creek Road, and this was the primary location used by Killeen Animal Services. In January 2023, the Texas Humane Heroes board of directors voted to close the Killeen location due to chronic operational losses. The impact of the Killeen closure on Animal Services was twofold: (1) it increased the roundtrip transport time for spay/neuter trips from 30 minutes to two hours, and (2) it decreased the number of spay/neuter cases Texas Humane Heroes was able to handle.

### *East Lake Veterinary Clinic*

In May 2023, City Council approved Resolution No. 23-085R, authorizing the purchase of the East Lake Veterinary Center located at 3518 East Rancier. Animal Services plans to use the former veterinary clinic as its adoption center and is currently seeking to bring a full-time licensed veterinarian onboard. A portion of the main facility can then be used for quarantine purposes, which will allow Animal Services to shut down its dilapidated quarantine building. As noted in Resolution 23-085R, the Department of State Health Services had repeatedly cited the substandard condition of the quarantine facility as a cause for concern that could result in closure of the facility if not addressed.



### *Trap-Neuter-Return Ordinance and Amendments*

Trap-Neuter-Return (TNR) refers to a nonlethal population control practice dating back to the mid-20<sup>th</sup> century, as an alternative to the catch-and-kill approach. Under a TNR program, free roaming cats are trapped, spayed/neutered, vaccinated for rabies by a licensed veterinarian, then returned to the trap location.<sup>1</sup> The goal is to maintain the integrity of a cat colony while systematically spaying/neutering its members, thereby reducing the population over time.



<sup>1</sup> Free roaming cats for the purposes of this report refers to outdoor cats, either feral or abandoned, who live in a loose-knit community.

In 2009, the City introduced TNR provisions into its Animal Ordinance (Chapter 6), which allowed for the practice of TNR amongst the City's free roaming cat caregivers. The ordinance imposed several administrative compliance elements for cat colony managers. Each colony manager was required to apply for a permit, register each colony, and submit reports annually on the number of cats per colony, the number of cats sterilized and vaccinated, and the veterinary clinic used.

In October 2020, the Parks and Recreation Department working with the City's Animal Advisory Committee amended the City's TNR provisions. The amendments added significant verbiage to the ordinance and imposed additional requirements, including defining colony managers' duties for weekends, holidays, and vacations spent away from their colonies; prohibiting colonies within a half mile of schools, churches or playgrounds; and requiring that colony managers make every effort to remove kittens from a colony before eight weeks of age for adoption through Animal Services or an approved non-profit animal welfare organization.

Finally, in April 2023, the City Manager's Office working with the Animal Advisory Committee again amended Chapter 6's TNR provisions. The amendments eliminated much of the verbiage from the prior amendment, including the above-mentioned requirements. However, the amendment added new requirements, including the need for colony managers to renew annually their colony manager permits. In addition, the ordinance imposed size limits on residential cat colonies, restricting those colonies to six or fewer free roaming cats.

### **Prior Audits**

The City Auditor conducted an audit of Killeen Animal Services in 2018. That audit found that the shelter had made progress in several areas, including its live release rate and physical improvements to its facility. However, the shelter was relying mainly on adoption contracts to enforce the city's spay-neuter ordinance, rather than ensuring shelter animals were spayed or neutered before they were adopted out. In addition, the shelter underutilized social media and lacked a comprehensive marketing strategy for promoting shelter activities. Finally, the shelter had done little to promote and facilitate the TNR provisions of the city's Animal Ordinance enacted in 2009.

## **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. Those standards also require that we, as internal auditors, meet the criteria for independence. We believe that we met those independence standards, and that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

## FINDINGS AND RECOMMENDATIONS

### **The City Auditor's audit of Animal Services found areas of progress, countered by setbacks, and bolstered by opportunities.**

Animal Services' performance since the last audit was marked by significant progress in some areas. The Intergovernmental Support Agreement with Fort Cavazos provided much-needed resources to Animal Services' perennially under-funded operation. As of September 30, 2023, Animal Services had received \$1.2 million in payments, effectively doubling the Animal Services prior year's budget. This allowed the City to hire additional staff, purchase additional vehicles, and provide physical improvements to the main facility. In addition, Animal Services has vastly improved its marketing strategy, including both traditional and social media, as well as community outreach through adoption and vaccination campaigns. Despite these improvements, the shelter did incur setbacks. Its live release rate fell to 66 percent in FY 2023 from a high of 85 percent in FY 2021. The decline was attributed to rising intake, coupled with stagnant adoptions and rescues fueled by worsening economic conditions, a trend that was mirrored in shelters across the country. Also on the decline was Animal Services pre-sterilization rate, which fell to 28 percent of adoptions in FY 2023. The decline was attributed in large part to the closure of Texas Humane Heroes' Killeen clinic, which handled the bulk of the shelter's spay-neuter workload. Further, Animal Services TNR efforts have largely stalled, with colony managers appearing to have opted out of the program. The program needs to shift away from its compliance oriented approach towards an approach more in line with best practices that focuses on outreach and education. These setbacks notwithstanding, the purchase of the East Lake Veterinary Center in May 2023 brought with it opportunities for improvement. The additional kennel space for adoptable animals should sharply reduce, if not eliminate the need for space-based euthanasia, and the potential for an in-house veterinary clinic should ensure that all adoptable animals are spayed or neutered on-site before they are released for adoption.

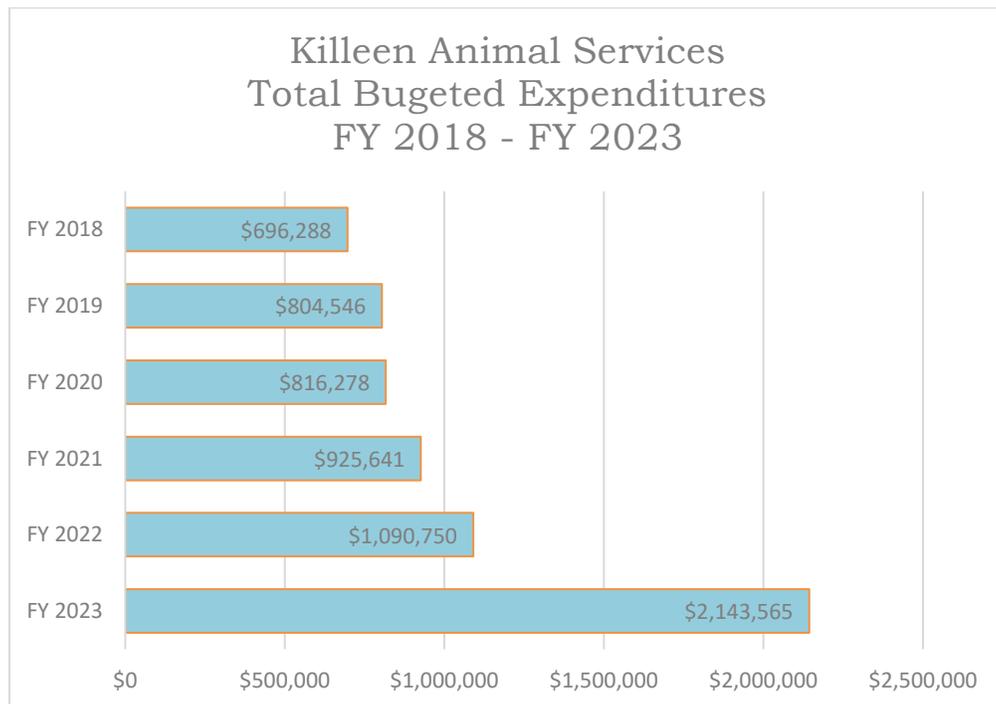
## Progress

Killeen Animal Services has made notable progress since the last audit in several key areas, including increased staffing, capital and other improvements, increased usage of social media and traditional media, and establishment of long-term goals for 100 percent spay/neuter of all adoptable cats and dogs.

### *Staffing*

As noted in the Introduction, the needs assessment conducted in 2016 found that the City shelter was understaffed compared to a benchmark analysis of similar-sized operations. At the time of the study, the Police Department's Animal Services Unit had 18 full-time positions, including 7 animal control officers. The study recommended implementing a long-term staffing goal of 31 full-time positions, including 9 animal control officers. As of FY 2022, total full-time positions had reached 23, although total animal control officer positions had fallen to 5.

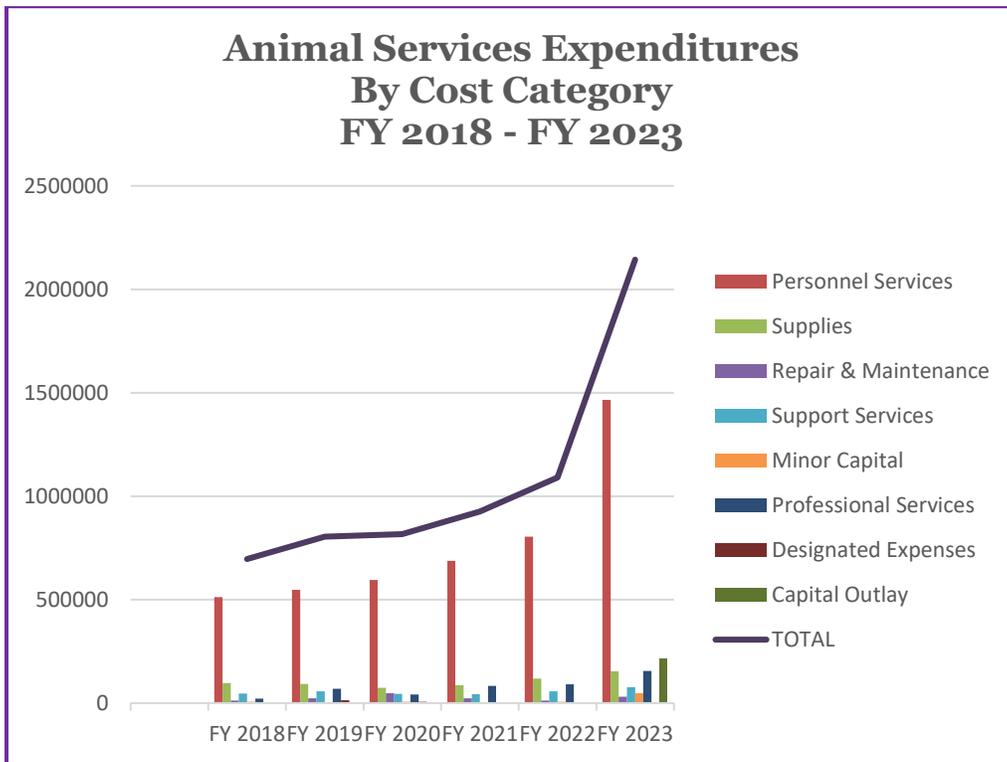
Under the first year of the City's IGSA with Fort Cavazos, the federal government paid the City approximately \$1.2 million, effectively doubling Animal Services' FY 2022 budget and more than tripling its FY 2018 budget.



Source: Annual Budget Reports

Of the \$1.2 million, approximately \$660,000 was allocated for personnel, nearly doubling the \$800,000 budgeted in FY 2022. The additional funding allowed Animal Services to add four more animal control officer positions, including two senior officer positions bringing the total to nine. Other new positions created included assistant vet technician and assistant program coordinator. In total, the additional funding from the IGSA brought staffing to 30 positions, including the 9 animal control officer positions. This essentially brought the shelter in line with Shelter Planners of America’s long-term staffing goal for the Killeen Animal Shelter.

A more granular look at the impact of IGSA funding on the Animal Services budget is shown in the graph below. As previously mentioned, the most dramatic increase was in the personnel category. Also notable, however, was the increase in capital outlays.



Source: Annual Budgets

## Capital and Other Improvements

In FY 2020, Animal Services purchased commercial grade washer and dryer units and a commercial grade dishwasher. At the time of the last audit, Animal Services was using a household washer and dryer system and staff were hand washing bowls and utensils. The needs assessment had cited the residential grade washer-dryer as an operational deficiency, ill-equipped to help prevent the spread of disease, such as the canine parvovirus.



Also in FY 2020, Animal Services added a row of 12 holding or “temp” kennels, which are used to house dogs while their kennels are cleaned. The temp kennels improve overall efficiency of operations by allowing staff to clean multiple kennels at a time. The temp kennels also free-up staff who would otherwise have to stay with the dogs, in the yard while their kennels are cleaned.



In FY 2023, City Council authorized the purchase of 4 additional animal control vehicles for the additional animal control officer positions. The vehicles are currently on back order, due to supply-chain issues. Fleet Services management anticipates the new trucks will arrive between May and July 2024.

Finally, in FY 2023, Animal Services installed a shade canopy over the dog play yards, paid for with funds from the Animal Services Petco grant award. While the grant is to be used primarily for spay/neuter purposes, the grant does give shelter management discretion to use the funds for other needs-based requirements, including capital improvements. Animal Services had previously listed this item as a planned improvement in both the FY 2021 and FY 2022 budgets.



## Social Media

Animal Services use of social media to promote adoptions, volunteering, fostering and other shelter activity has improved dramatically since the last audit. At that time, Animal Services' use of social media was minimal, consisting primarily of periodic posts to the Police Department's Facebook page. Further, coordination with the Communications Department was virtually non-existent, and the unit did not have a comprehensive strategic approach to promoting the shelter.

Animal Services began developing a more strategic approach in FY 2020, when it created a full-time program coordinator position. In FY 2021, Animal Services implemented a monthly calendar of events to promote shelter activity in coordination with the Communications Department. At the time of this audit, Animal Services had implemented a multi-pronged marketing strategy that included Facebook, Instagram, the City website, local television, and on-location events for adoptions and vaccinations.



Source: City's Facebook Page

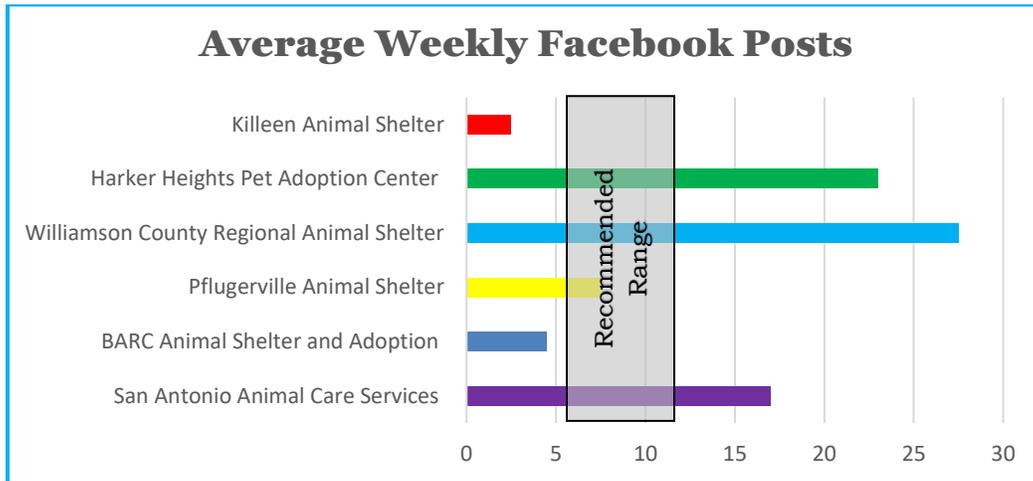
Animal Services has made significant progress in expanding its use of Facebook to promote shelter activities; however, unlike many other local government shelters, it does not have its own dedicated Facebook page. Instead, Animal Services utilizes the City’s main Facebook page. While Facebook is only one of several social media platforms, it remains the dominant platform, with nearly a billion more users than Instagram.

The frequency of posts is much improved from the shelter’s utilization of the Police Department’s Facebook page noted in the last audit. However, its utilization is less than that of shelters with their own Facebook pages.



Source: Various Shelter Facebook Pages

We reviewed the City’s main Facebook page for several two-week periods to determine the average weekly number of Facebook posts related to Animal Services. We also reviewed Facebook activity over two-week periods for shelters with dedicated Facebook pages, including Williamson County, Harker Heights, Pflugerville, Houston and San Antonio.



Source: Various Shelter Facebook Pages

The City of Killeen’s main Facebook page averaged 2.5 posts per week related to Animal Services activity. As shown in the chart above this utilization rate was lower than that of other shelters reviewed, all of which had their own Facebook pages. There is no standard-setting body governing the optimum utilization of social media platforms. However, Maddie’s Fund, a national animal welfare grant-funding and research organization recommends a frequency range of 6-to-11 Facebook posts per week for shelters.

Both Animal Services and the Communications Department have discussed setting up a dedicated Facebook page for the shelter. Among the issues to be resolved are the resources required and whether content should be managed by Animal Services staff or Communications staff detailed to Animal Services.

*Pre-Sterilization*

At the time of the last audit, Animal Services relied primarily on its adoption contracts to ensure compliance with the spay/neuter provisions of the City’s Code of Ordinances. As discussed in the prior audit, that strategy proved ineffective. In FY 2020, Animal Services adopted a long-term goal of 100 percent pre-sterilization, i.e., getting

all adoptable dogs and cats spayed or neutered before they are released for adoption.

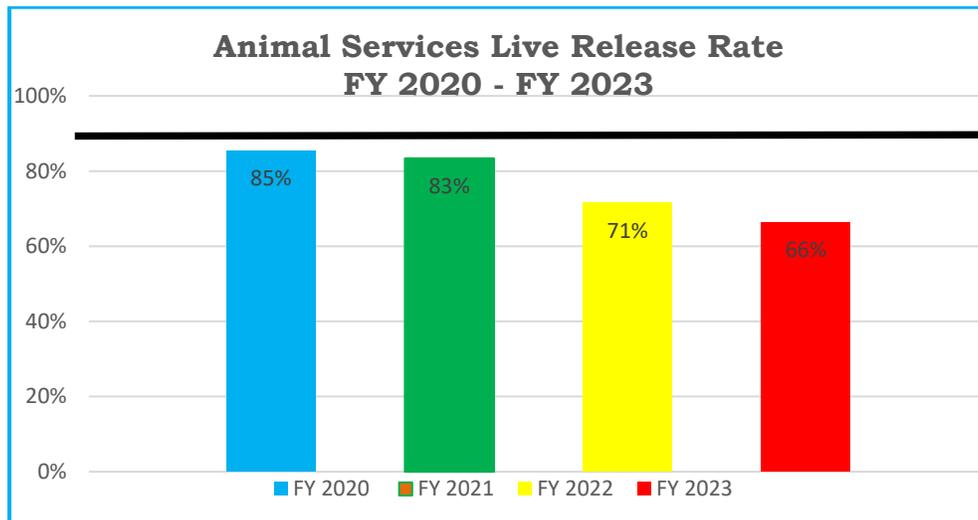
Towards that end, in FY 2021, Animal Services entered into veterinary services contracts with local veterinary clinics for spay and neuter services, first with Aztec Pet Hospital, then with Texas Humane Heroes. In addition, they established incremental goals towards achieving 100 percent pre-sterilization. Animal Services has experienced some setbacks in its pre-sterilization efforts, as will be discussed in the next section. However, the establishment of pre-sterilization as a strategic goal nonetheless represents a positive step by Animal Services.

### Setbacks

Despite the progress afforded by the City’s IGSA with Fort Cavazos, Animal Services experienced setbacks in several key areas during the review period. This included a significant decline in its live release rates and a decline in its pre-sterilization efforts. In addition, Animal Services’ efforts to engage free roaming cat caregivers through the City’s TNR ordinance provisions have largely stalled.

#### *Live Release Rates*

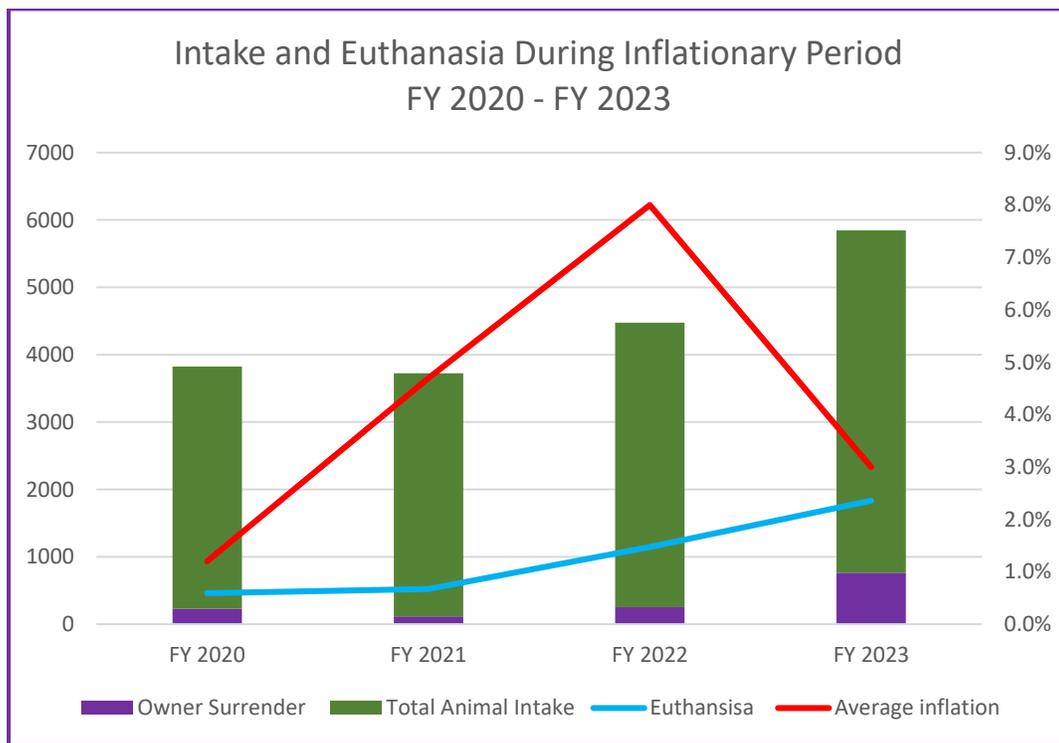
As shown in the chart below, Animal Services’ live release rate during the review period declined from a high of 85 percent in FY 2020 to 66 percent through FY 2023. The black line at the 90 percent mark denotes the live-release rate threshold at which a shelter is considered a “No-Kill” shelter.



Source: Animal Services Activity Reports

The decline in the live release rate was driven primarily by an increase in the euthanasia rate, which in turn was driven by an increase in animal intake coupled with stagnant live releases (adoptions, return to owners, and transfers out to rescue groups). Both the increases in animal intake and the flat-lining of live releases appeared to be driven in large part by post-pandemic economic conditions, specifically, once-in-a-generation inflation, which peaked at 9 percent in June 2022.

The chart below shows intake and euthanasia rates rising steadily along with cost-of-living increases reflected through rising inflation. The rise in intake appears to be driven in part by the increase in owner surrenders.

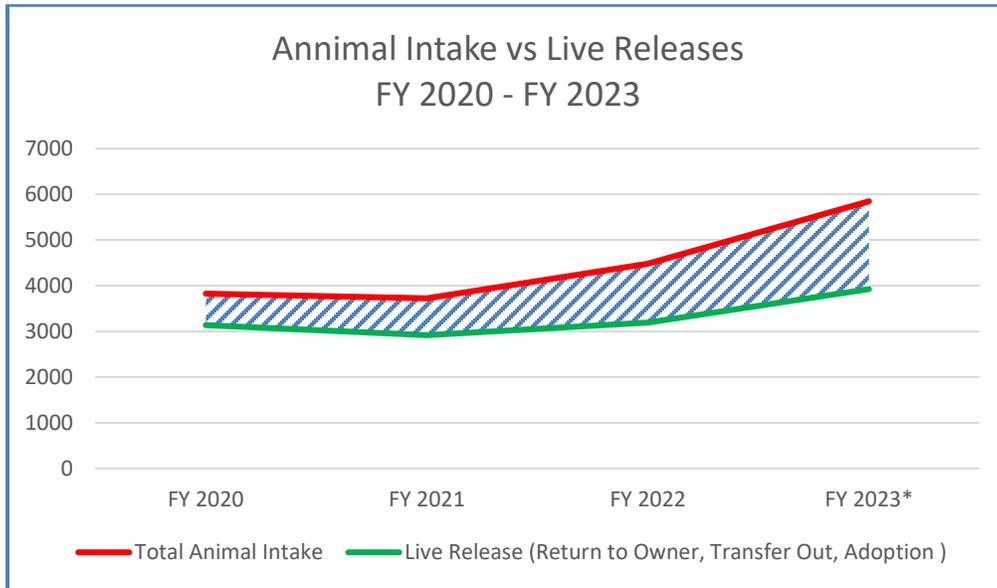


Source: Animal Services Activity Reports

It should be noted that the dip in the inflation rate in FY 2023 does not mean that consumer prices dropped. It simply means that prices increased at a slower pace. According to Moody's Analytics, American households in 2023 are spending on average approximately \$8,500 more per year than they were pre-inflation.

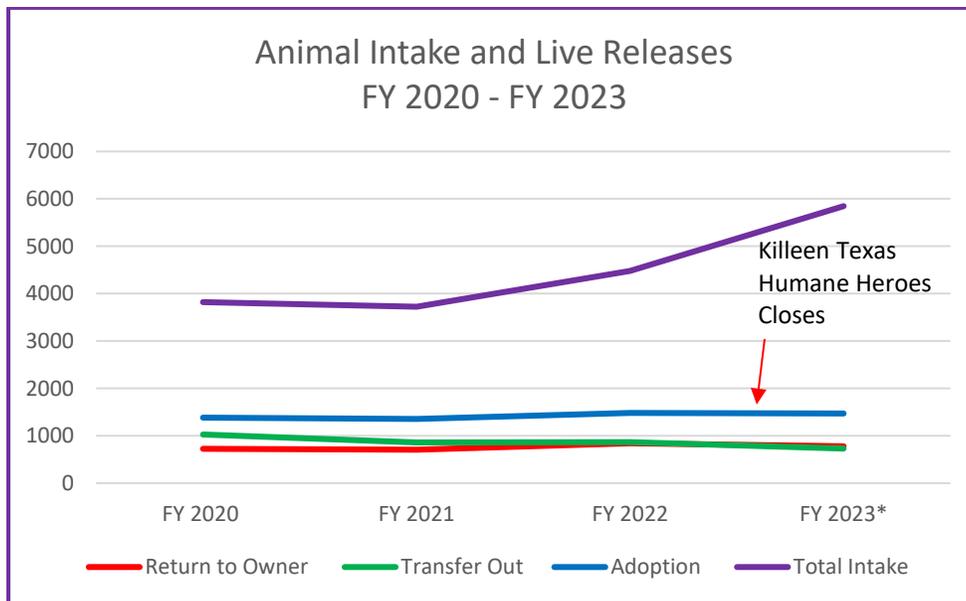
The widening gap between intake and live releases more than doubled during the review period. Animal Services took in nearly 700 more

than it released in FY 2020. As of the end of FY 2023, the excess of intake over live releases had grown to over 1900.



Source: Animal Services Activity Reports

A more granular look at live releases in the chart below, shows a significant drop in transfers out to rescue groups, which declined by nearly 300, from 1027 in FY 2020 to 730 in FY 2023. It was that decline coupled with relatively static return-to-owner and adoption numbers that kept live releases down as intake numbers increased in FY 2022 and FY 2023.



Source: Animal Services Activity Reports

The decline in rescue transfers was hastened by the closure of the Killeen Texas Humane Heroes in early 2023, which was a consistent and reliable source for rescue transfers, according to staff. While the Leander location continues to take rescues, its capacity is limited by the same economic factors affecting the Killeen shelter.

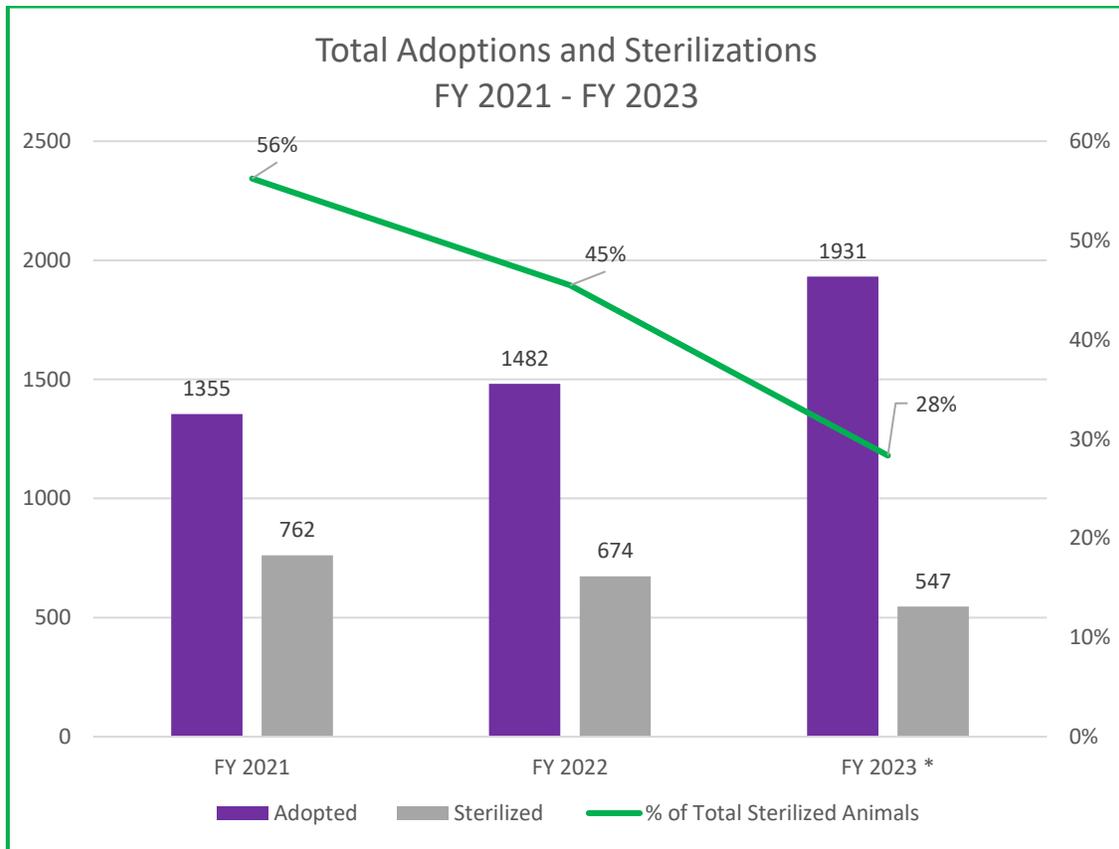
Correlation, of course does not necessarily equate to causation regarding the impact of national economic trends on the shelter. However, we noted anecdotal evidence of similar trends in shelters across the country, suggesting there is a clear causal link between worsening economic conditions and rising euthanasia rates due to increased animal intake.

- In Atlanta, Georgia, the head the rescue organization, PAWS Atlanta noted that it had become evident that pet owners are facing financial struggles due to rising costs and inflation, resulting in an increase in owner surrenders.
- In Riverside County, California, euthanasia rates for healthy animals more than doubled, from 6 percent in 2021 to 15 percent in 2022 due to increases in animal intake, according to a Scripps News investigation.
- In Munster, Indiana, the shelter director of Humane Indiana noted a two-to-threefold increase in owner surrenders mostly related to the spike in the cost of housing and household goods.
- In Langlade County, Wisconsin, a member of the board of directors of the Wisconsin Humane Society noted that economic stress from rising costs were causing some pet owners to give up their dogs and cats.
- In Boise, Idaho, the public relations manager for the Idaho Humane Society noted a steady increase in the number of pets surrendered due to increased housing costs.
- In Cincinnati, Ohio, the community engagement manager for Cincinnati Animal Care noted that shelters that had not euthanized for space in the past were now doing so. The vice-president of the ASPCA echoed those remarks saying that shelters are having to make decisions around euthanasia that they have not had to make in some time.

*Pre-sterilization*

In FY 2020, Animal Services adopted a long-term goal of pre-sterilization for all adoptable cats and dogs. Those efforts began in earnest in FY 2021, in conjunction with Animal Services' first contract for veterinary services. The plan was to increase pre-sterilization rates incrementally, beginning with 30 percent in FY 2021. The chart below shows that while Animal Services outperformed its FY 2021 goal by 26%, its sterilization activity declined steadily over the period, eventually falling below the original goal in FY 2023.

The chart below shows Animal Services' spay/neuter activity, both in the terms of numbers sterilized and as a percentage of total adoptions.



Source: Animal Services Activity Reports

The reason for the decline in sterilizations was more an issue of access and capacity than funding, according to staff. Animal Services still had over \$100,000 in Petco grant funding available at the end of FY 2023. However, because the City shelter lacks its own in-house veterinary clinic, it must compete with the public for veterinary services from

local vet clinics. Animal Services' efforts to mitigate the problem through contracts have been mixed.

The greatest impact to the shelter's sterilization efforts came in early 2023 when the Killeen location for Texas Humane Heroes shuttered its doors. This not only reduced the number of sterilizations performed, but also increased the roundtrip commute time for staff fourfold, from 30 minutes to 2 hours. Animal Services has used other local vet clinics to help fill the gap left by Texas Humane Heroes, but the ultimate solution lies in Animal Services developing its own in-house veterinary capability.

### *Trap-Neuter-Return*

In the prior audit, the City Auditor noted that Animal Services, then under the Police Department had done relatively little in the decade since the TNR ordinance was passed to promote and facilitate the practice of TNR as the preferred method of population control for the City's free roaming cat population. The City website made no mention of free roaming cats or TNR. Animal Services had only a handful of registrants on file. The audit cautioned that the registration and reporting requirements in the ordinance could be acting as a deterrent to would be participants and recommended revisiting the compliance-oriented approach to TNR.

Now, as the City approaches the 15-year mark since it enacted its TNR ordinance, still relatively little has been done to promote and facilitate TNR. There is still no mention of free roaming cats or TNR on the City's Animal Services webpage, and few, if any public service announcements on the City's main Facebook page. Further, the compliance-oriented approach reflected in the Code of Ordinances has if anything grown more restrictive, with the addition of residential colony size limits and annual renewal of colony permits added to the ordinance. Alley Cat Allies, a national non-profit that has worked with local governments, including some in Texas to establish TNR programs, cautions that the compliance-oriented approach characterized by registration and permit requirements is a path to failure.

Not surprisingly, Animal Services staff acknowledged that they had no permits on file at the time of the audit, even though management had in December 2021 identified at least 12 known colony managers active in Killeen. Further, Municipal Court had no record of TNR-related compliance violations since enactment of the amended ordinance in

April 2023, indicating that the ordinance provisions were not being actively enforced.

### *Paradigm Shift*

The City has several options going forward with regard to its TNR ordinance: (1) Do nothing and leave an ordinance in place that appears to be neither followed nor fully enforced; (2) expend significant time and resources to bring the City's errant colony managers into compliance to include the seizure and euthanasia of illegal cat colonies; or (3) move away from the current compliance-oriented approach and adopt an approach more in line with best practices that takes a minimalist approach towards TNR ordinances and focuses instead on outreach and education.

### *Minimalist Approach*

Under the minimalist approach advocated by Alley Cat Allies and adopted by other local governments, including El Paso and Harker Heights local ordinances are used primarily to carve out exemptions for TNR cats from abandonment and at-large provisions in the local government's animal ordinance. For example, the following are exemption carve-outs from the El Paso Code of Ordinances:

*7.08.020 – Abandonment-Reporting violations. It is unlawful for any person to abandon any animal in the city. ... The release of an ear tipped cat at the location where it was trapped does not constitute abandonment with the meaning of this chapter.*

*7.12.010 – Running at large prohibited. ... The prohibition against an animal running at large shall not apply to... an tipped cat indicating that it has been processed through the trap-neuter-return protocol.*

Similarly, the Governor of Texas signed into law in June 2023, House Bill No. 3660 aka the "T-N-R is not abandonment law," which simply carves out an exemption for TNR cats from the abandonment provisions of the State's animal cruelty law.

Neither these local governments nor the State impose registration, permitting, or reporting requirements in their legislation. The City of Arlington does not even reference TNR in its Animal Ordinance. Instead, the city authorized its TNR program through a simple resolution in passed in 2013. Similarly, the City of Florence makes no reference to TNR in its Code of Ordinances. The Board of Directors for

the Williamson County Regional Animal Shelter authorized its TNR program. These government entities rely primarily on outreach and education to inform residents of the benefits of their respective Trap-Neuter-Return programs. Some webpages, such as the Williamson County Regional Animal shelter offer tips on trapping. The City of Florence simply provides links to other organizations for more information on TNR.



The benefits of an outreach and education approach is that it targets the entire community, not just a select few colony managers, who are already aware of the benefits of TNR. The average resident, for

example, may not be aware that putting out too much food for a single stray cat could eventually lead to an accidental colony.

### *Free Roaming vs Free Reign*

It should be noted that free roaming does mean free reign. The minimalist approach to TNR ordinances does not include an exemption carve-out for public nuisance violations. Free roaming cats deemed a public nuisance, regardless of their TNR status should be handled in accordance with the public nuisance provisions of Chapter 6, Section 6-37 – *Nuisances; abatement*.

### **Opportunities**

In 2016, the Police Department commissioned Shelter Planners of America to conduct a needs assessment for its Animal Services Unit. The needs assessment concluded that the City would need to either fully renovate and expand its current facility or acquire a new facility to meet current design standards. The study estimated the cost of a new facility at \$10 million in 2016 dollars.



In May 2023, City Council authorized the purchase of the East Lake Veterinary Center at 3518 Rancier Ave for \$1.7 million. In August 2023, Animal Services took possession of the property, which will serve as the City’s adoption center. In addition, the City is currently

recruiting a full-time veterinarian for an in-house clinic. While the purchase of the pre-existing clinic falls short of the needs assessment recommendation for a single full-service location, it nevertheless creates opportunities for Animal Services in terms of expanded capacity and in-house veterinary clinic capabilities.

### *Space-Based Euthanasia*

As previously noted, euthanasia rates increased steadily during the review period. This included space-based euthanasia for dogs, which peaked in FY 2023 at 394 dogs euthanized due to lack of space.

Shelter management estimates that the East Lake facility, which should be operational in early 2024 could provide from 16 to 26 new kennels for housing adoptable dogs. Management also estimates that the average turnaround time for adoptable animals ranges from 14 to 30 days, for an overall average of 22 days  $[(14+30)/2]$

Based on an estimated kennel turnover rate of about 17 dogs per kennel per year  $(365/22)$ , this would mean that additional kennel space at the adoption center would accommodate an additional 272 to 442 dogs per year. Assuming the current intake and adoption rates remain relatively steady going forward, this would sharply reduce, if not eliminate the need for space-based euthanasia.

### *Pre-sterilization*

When the first low-cost spay/neuter clinic opened in Los Angeles in 1971, euthanasia of dogs and cats in the nation's shelters had reached over 20 million annually. That number has now fallen to approximately 1.5 million. While still high, the dramatic decline nonetheless represents a vast improvement in animal welfare over the past half-century, and much of that decline can be attributed to the rise in spay/neuter programs nationally.

In FY 2021 Animal Services adopted a long-term goal of 100 percent pre-sterilization of all adoptable dogs and cats. Their efforts to date have met with only limited success, the result of having to compete with the public for scarce veterinary resources. However, Animal Services' plans for a veterinary-staffed adoption center if



brought to fruition should ensure achievement of this goal.

### *Trap-Neuter-Return*

The practice of TNR has gained in popularity both domestically and abroad since its inception in the mid-20<sup>th</sup> Century. Most recently, the State of Texas lent its support to TNR with passage of House Bill 3660 in June 2023. That said, several in-depth studies conducted in the past decade have questioned the efficacy of TNR as a means for population control, citing instances where cat populations increased rather than decreased. The critical factor cited in these studies was the need to achieve sterilization rates of over 70 percent in a specific location for TNR to be effective. This may require significant time and resources of the individuals who engage in the practice.

Toward that end, a key component of a successful TNR program is reliable access to low-cost spay-neuter services. Residents who make the effort to spay-neuter free roaming cats are more often than not individuals living on fixed incomes, or small non-profits reliant upon donations. The cost to spay/neuter and vaccinate free roaming cats could run into the hundreds, even thousands of dollars, annually. Even for those with the financial wherewithal there can be months-long wait-times at some local vet clinics who perform TNR services. At least one local vet clinic was not accepting any TNR cats at the time of our audit, due to limited resources.

For these reasons, the more successful TNR programs tend to be those where local government shelters with in-house veterinary clinics provide low-cost or no-cost TNR services for residents. Indeed, the Harker Heights Pet Adoption Center acknowledged that they would not have gone forward with their recently established TNR program had they not had an in-house veterinarian-staffed clinic.

Animal Services should consider adopting a similar approach in conjunction with its plans to establish an in-house veterinary clinic. Harker Heights offers spay/neuter services for TNR cats for a nominal \$20 fee for city residents. Both the Williamson County Regional Animal Shelter and El Paso Animal Services provide TNR services free of charge for residents. In addition to Petco, several non-profit grantor agencies, including Best Friends Animal Society and Maddie's Fund offer grants to help defray the cost of spay/neuter surgeries.

## **Recommendations:**

The City Auditor Recommends that the Director of Animal Services:

1. Work with the Executive Director of Communications and the Assistant City Manager to develop and implement a plan to launch a dedicated Facebook page for Animal Services.
2. Work with the Executive Director of Communications to develop and implement a social media campaign focusing on outreach and education on the benefits of TNR.
3. Work with the Assistant City Manager to revise Chapter 6 of the Code of Ordinances to align with best practices regarding the TNR provisions of the ordinance.
4. Develop a long-term goal in conjunction with the establishment of an in-house veterinary clinic to offer low-cost spay/neuter services for free roaming cats, with the caveat that priority should be given to pre-sterilization of adoptable animals.

## **OTHER MATTERS**

Animal Services maintains a single special revenue fund for both donated funds and its Petco grant funds. The funds are tracked separately, so they are not commingled. However, the Petco grant funds are marginally more restricted in use than the donated funds. Further, the grouping of grant funds and donated funds in the same special revenue fund is not consistent with how grant revenues are accounted for in other departments, such as the Police Department, where grant funds are maintained separate from the department's donated funds. To enhance transparency and consistency of operations across department lines, management should consider establishing a special revenue fund for Animal Services' grant funds.

## **VIEWS OF RESPONSIBLE OFFICIALS**

Copies of the draft report were provided to the Director of Animal Services, as well as the Fort Cavazos and Killeen Shelter Managers for review and comment. They agreed with the findings and recommendations. In addition, they provided input during the audit, which is reflected throughout the report.

## **OBJECTIVES, SCOPE AND METHODOLOGY**

### **Objectives**

The objectives of the audit were to: (1) assess the performance of the City's Intergovernmental Support Agreement with the United States to operate the Fort Cavazos Stray Animal Intake Facility; and (2) conduct follow-up on the City Auditor's prior audit of Animal Services in the areas of live release rates, pre-sterilization, and trap-neuter-return (TNR).

### **Scope and Methodology**

The scope of the audit focused primarily on Animal Services activity for FY 2020 through FY 2023.

To address the audit objectives, the City Auditor:

- Had discussions with the Director of Animal Services, the Killeen Shelter Manager, the Fort Cavazos Shelter Manager, the City Attorney, Assistant City Attorney-Prosecutor, Director of Williamson County Regional Animal Shelter, El Paso TNR Coordinator, Cat Colony Managers, Shelter Manager for the Harker Heights Pet Adoption Center, Shelter Manager for Lampasas Animal Shelter, and several TNR non-profit organizations.
- Obtained and analyzed Animal Services activity reports for FY 2020 through FY 2023.
- Conducted walkthroughs of the Killeen Animal Shelter and the Fort Cavazos Stray Animal Intake Facility.
- Conducted research on the impact of economic conditions on animal shelter activity nationwide.
- Conducted research on TNR best practices, and reviewed legislation in other Texas local governments, including Harker Heights, Williamson County, Florence, El Paso, Round Rock, and Arlington.

## **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. Those standards also require that we, as internal auditors, meet the criteria for independence. We believe that we met those independence standards, and that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.