

Internal Audit Report

Animal Shelter Live Release Review

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Auditor's Opinion

July 19, 2019

Internal Audit has completed Animal Shelter Live Release Review. We conducted this engagement as a special request from Management.

The audit objectives were to:

- Review and confirm the accuracy of the Asilomar Live Release Rate
- Determine compliance with established policies and procedures related to Shelter Data and the Live Release Rate
- Compare processes for shelter data and Live Release Rates to best practices and identify any opportunities for improvement

To these ends, Internal Audit:

- Met with management to confirm their desired engagement outcomes
- Mapped live release rate related processes and evaluated the internal control environment. Internal controls consist of all the measures taken by management to:
 - Protect its resources against accidental loss, waste, fraud, and inefficiency;
 - Ensure the completeness, accuracy, timeliness, and reliability of accounting and operating data;
 - Ensure compliance with federal, state, and local laws; regulations; and internal policies and procedures;
 - o Promote efficient and effective operations; and,
 - Monitor the achievement of management's goals and objectives.
- Identified and evaluated risks
- Performed the fieldwork steps necessary to gather sufficient evidence upon which to base our conclusions related to the engagement objectives

It is our opinion, based upon the results of our engagement procedures, that the reported Live Release Rates are accurate, the Shelter complied with policies and procedures related to its data and its euthanasia procedures, and the Shelter is effectively applying best practices.

We have detailed some areas for improvement in the audit review section below. Our findings follow the same numbering scheme (ISS.##) as for recommendations listed in the management letter issued under separate cover dated July 19, 2019. Any numbers missing from the sequences in this report are included in the referenced management letter.

Wayne C. Sommer Internal Audit Manager, CPA, CGMA

Audit Profile

Audit Team

Wayne Sommer – Manager, CPA, CGMA Michelle Crawford – CIA, CFE, MS Accounting Sheree Van Buren – CIA

Audit Background

City Management requested Internal Audit review the Live Release Rates for the Animal Shelter. The Animal Shelter calculates the Live Release Rate in accordance with the Asilomar Accords.

Scope

Our engagement scope included Shelter data related to the Live Release Rate from January 1, 2010 through December 31, 2018. This allowed us to examine trends related to Shelter practices before and after the arrival of the current Shelter Manager, Jenee Shipman.

Background

The Aurora Animal Shelter (AAS) is subject to the Pet Animal Care Facilities Act (PACFA) Program, a licensing and inspection program dedicated to protecting the health and well-being of pet animals in facilities throughout Colorado.¹

Animal shelter and rescue licensees (e.g. AAS) shall report to the Commissioner on a yearly basis the number of dogs, cats and other pet animals that are accepted into the animal shelter or foster home(s). Animal shelter and rescue licensees shall also report to the Commissioner on a yearly basis the number of dogs, cats or other pet animals that are returned to the owner, adopted to new owners, transferred to other licensed facilities, euthanized or died while at the facility. The reports shall be submitted on forms supplied by the Commissioner.²

The data collected and reported under PACFA essentially mirrors the data required to calculate the Asilomar Live Release rate. The exceptions are that Asilomar only requires the reporting of dogs and cats whereas PACFA data relates to all animals, wild and domestic, and the Asilomar data requires a breakdown of animal condition for euthanasia data.

A group of animal welfare industry leaders from across the nation created the Asilomar Accords in 2004. The accords were created "for the purpose of building bridges across varying philosophies, developing relationships and creating goals focused on significantly reducing the euthanasia of healthy and treatable companion animals in the United States."³

The accords created a uniform method for collecting and reporting shelter data across different organizations. The accords developed definitions to enable uniform and accurate collection, analysis and reporting of animal-sheltering data and statistics.⁴

Per the American Society for the Prevention of Cruelty to Animals (ASPCA):

The Asilomar Accords emphasize the importance of transparency for animal sheltering organizations. Using the development of community definitions for the condition of animals as they are admitted has encouraged the development of community coalitions focused on improving Live Release Rates at a community level. It is important to recognize that condition definitions only define a status at a specific point in time (generally at the time of admissions). The definitions do NOT define outcome. A healthy animal may be euthanized; an unhealthy/untreatable animal may be rehomed.

Because the condition definitions are community based, comparison at a regional or national level is problematic, as definitions will vary.

¹ <u>https://www.colorado.gov/pacific/aginspection/pacfa</u>

² <u>https://docs.google.com/forms/d/e/1FAIpQLSeWYdqYPKRuPgd04AFvAsIGw1DxZm1V8NN5loG9iwK_2_NJMQ/viewform</u>

³ "The Asilomar Accords" Preface and Guiding Principles, <u>https://www.shelteranimalscount.org/docs/default-</u>

source/DataResources/2004aaccords5.pdf?sfvrsn=31c1ff76_0
⁴ Ibid.

For the purpose of calculating the Asilomar Live Release Rate, the definition of what is "unhealthy/untreatable" directly impacts the calculation. Owner Requested Euthanasia Outcomes for animals initially defined upon Admission as "unhealthy/untreatable" are not included in the calculation of an Asilomar Live Release Rate."⁵

The Aurora Animal Shelter follows the Asilomar definitions, which, include:

- *Healthy:* The term "healthy" means and includes all dogs and cats eight weeks of age or older that, at or subsequent to the time the animal is taken into possession, have manifested no sign of a behavioral or temperamental characteristic that could pose a health or safety risk or otherwise make the animal unsuitable for placement as a pet, and have manifested no sign of disease, injury, a congenital or hereditary condition that adversely affects the health of the animal or that is likely to adversely affect the animal's health in the future.
- **Treatable:** The term "treatable" means and includes all dogs and cats who are "rehabilitatable" and all dogs and cats who are "manageable."
- **Unhealthy and Untreatable:** The term "unhealthy and untreatable" means and includes all dogs and cats who, at or subsequent to the time they are taken into possession,

(1) have a behavioral or temperamental characteristic that poses a health or safety risk or otherwise makes the animal unsuitable for placement as a pet, and are not likely to become "healthy" or "treatable" even if provided the care typically provided to pets by reasonable and caring pet owners/guardians in the community; or

(2) are suffering from a disease, injury, or congenital or hereditary condition that adversely affects the animal's health or is likely to adversely affect the animal's health in the future, and are not likely to become "healthy" or "treatable" even if provided the care typically provided to pets by reasonable and caring pet owners/guardians in the community; or

(3) are under the age of eight weeks and are not likely to become "healthy" or "treatable," even if provided the care typically provided to pets by reasonable and caring pet owners/guardians in the community.⁶

Asilomar Annual Live Release Rate

The Annual Live Release Rate is calculated by dividing total live outcomes (adoptions, outgoing transfers, and returns to owner/guardian) by total outcomes (total live outcomes plus euthanasia not including owner/guardian requested euthanasia or died/lost in shelter/care).⁷

⁵ National Federation of Humane Societies, "What is Your Rate?" <u>http://www.aspcapro.org/sites/pro/files/What%20is%20your%20Rate%2010_2013.pdf</u>

⁶ "The Asilomar Accords" Preface and Guiding Principles, <u>https://www.shelteranimalscount.org/docs/default-source/DataResources/2004aaccords5.pdf?sfvrsn=31c1ff76_0</u>

⁷ "The Asilomar Accords", Annual Live Release Rate Formulas, <u>https://www.shelteranimalscount.org/docs/default-source/DataResources/2004aaccords5.pdf?sfvrsn=31c1ff76_0</u>

The Live Release Rate is valuable information, but is not the only measure for how well Animal Shelters operate. According to the National Federation of Humane Societies (NFHS), "The Asilomar Live Release Rate tells us what percentage of animals with an outcome left the facility with a Live Outcome (adoption, return to owner, etc.) The Asilomar Live Release Rate does NOT tell us how Outcomes (All or Live) relate to Intake. Overall, the Asilomar Live Release Rate does not provide insight regarding the Intake of an animal sheltering organization. Many animals may be admitted, and sheltered for a long period of time, and their status will not be reflected by this outcome focused measurement."

Per the National Federation of Humane Societies (NFHS), "There are many other data indicators which will better help an organization understand or evaluate their shelter operations and improvement toward decreasing risk for shelter animals. Some examples of indicators to watch are:

- Admissions
- Adoptions
- Return to Owner (RTO)
- Euthanasia
- Length of Stay

Careful examination of data can help an organization identify specific populations of animals who are most at risk within the shelter and aid in the timely development of strategies to mitigate the identified risk. Data from the communities an organization serves is yet another potential source of important information when evaluating shelter programs and impact."⁸

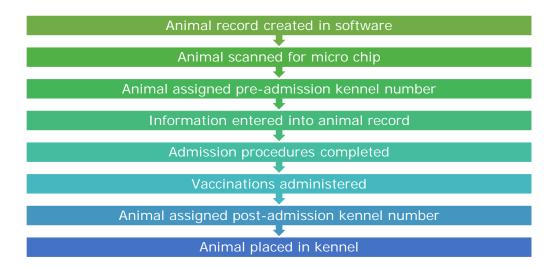
Internal Audit Observations

Intake

As part of our procedures, Internal Audit observed the process employed when an animal arrives to the Aurora Animal Shelter. The shelter is an open admissions shelter, taking animals and breeds of all kinds and from all jurisdictions regardless of condition. Upon arrival, front desk staff creates an animal record within the Chameleon system⁹. The below graphic is a high-level illustration of the process.

⁸ National Federation of Humane Societies, "What is Your Rate?"

http://www.aspcapro.org/sites/pro/files/What%20is%20your%20Rate%2010_2013.pdf



Chameleon produces inventory reports twice daily. A shelter attendant/supervisor conducts a morning inventory and an evening inventory, counting all animals in the shelter. The intake is a uniform process for all animals received. Internal Audit did not identify any instances of non-compliance with the Shelter's standard operating procedures (SOPs) during the intake walkthrough.

Euthanasia

To gain an understanding of the euthanasia procedures, Internal Audit flowcharted the euthanasia steps and observed a procedure. The Animal Shelter has SOPs in place for the following activities, each containing a set of controls. Internal Audit included a graphic in Appendix A.

- Marking an animal for euthanasia
- Confirming animal identity prior to euthanasia
- Creating the pre-euthanasia solution
- Administering/logging the pre-euthanasia solution
- Administering/logging fatal plus¹⁰
- Performing the euthanasia procedures as a technician/holder

Once the Shelter Manager, supervisor, or staff qualified to mark an animal for euthanasia has deemed an animal unadoptable, the animal is properly marked within the Chameleon system according to the Asilomar definitions described in the background section above¹¹. A daily pre-euthanasia report lists the animals marked for euthanasia. Only supervisors can verify the daily pre-euthanasia list. The supervisors review each animal on the list to ensure it is properly marked for euthanasia within Chameleon and there is an initial from a qualified staff member. The verifying supervisor will print his/her signature on the final page, confirming they have verified the accuracy of the list.

¹⁰ Fatal-Plus is a leading drug in the area of animal euthanasia, and is appropriate for all species (no species restrictions) because of its favorable syringability. <u>http://www.vortechpharm.com/index.php/fag/</u>

¹¹ Qualified Staff: Only the Lead Shelter Assistant, Animal Services Assistant, the Veterinarian, and the Animal Shelter Manager can mark an animal for euthanasia within Chameleon. They hold the necessary certifications and trainings to make this determination.

The Veterinary Technician (technician) will obtain the pre-euthanasia list from the Shelter Manager and perform an additional review of the report, verifying that a qualified staff member has initialed by each animal, and that the verifying supervisor has signed the final page.

A euthanasia procedure requires the presence of a technician, one who administers the solutions, and a holder, one who holds and comforts the animal. The technician performs multiple verifications of the animal from viewing the Chameleon record, animal type and weight, observing the picture in chameleon, visually inspecting the animal, verifying the animal tag and ID number, kennel number, and reading the "marked for euthanasia" memos from the qualified staff member on the treatment screen. These procedures also include verifying there is no indication of a potential owner or adopter.

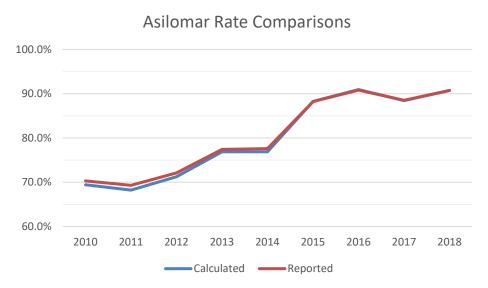
Only certified technicians, the Shelter Manager, and the Veterinarian know the code to the safe containing the solutions for euthanasia. Once they perform all verifications, the technician will unlock the safe to obtain the pre-euthanasia solution (sedation) and the Fatal-Plus. The technician will draw up the proper sedation dosage according to the animal's weight. All holders receive training on proper restraint holds that aid the comfort of the animal but also help the technician access the necessary veins. As a best practice and in accordance with shelter procedures, the technician will administer the sedation intramuscularly. Once there are no reflexes (complete sedation), the technician will draw up the dose of Fatal-Plus based on the animals' weight and administer the drug intravenously. After the technician and the holder have confirmed the animal is no longer conscious, the technician will confirm death using the heart stick method. This is in accordance with shelter procedures and best practices.

The technician will log all final notes within Chameleon, including documenting the amount of drugs administered, writing the final euthanasia memo, dating and initialing each entry, and marking "EUTH" in the outcome field of Chameleon. The holder will properly discard of the animal in accordance with the SOP, then clean and sanitize the procedure room.

Internal Audit did not identify any instances of non-compliance with the SOPs during our observation. The Drug Enforcement Agency (DEA) inspects the shelter drug logs on a random and infrequent basis. Internal Audit reviewed the results of the two inspections performed in the last five years. There were no noted issues. We identified some minor areas where the shelter can make improvements to the overall procedures and have noted them in the Issue Details section of this report.

Asilomar Live Release Rate Recalculations

We acquired a Chameleon system data download of all records from January 1, 2010 to December 31, 2018. We performed procedures to verify the data population was complete. Using the data, we recalculated the reported Live Release Rates for the years 2010 through 2018. We did not find any material differences between the reported rates and our recalculations. The chart below shows the Asilomar Live Release Rates for AAS; we adjusted the chart's Y-axis to highlight the differences between the reported data and our recalculation. The rate and its reporting accuracy have been steadily improving over time.



Based upon our testwork, we are satisfied that the reported Asilomar Live Release Rates are accurate as presented.

The Asilomar Live Release Rate is an outcome measure. According to Roger Haston, Ph. D. (former Executive Director, Animal Assistance Foundation), there are problems with outcome data.¹²

- 1. Outcome data is the result of a system.
- 2. Understanding causality is difficult because outcome data are often the cumulative effect of multiple variables.
- 3. Variance in the outcome data is hard to interpret, however asking the right questions as to why the data has variance is critical.¹³

¹² Beyond Labels: Understanding the True Impacts of Live Release Rate and Intake Policies; Haston, Roger, PhD, Animal Assistance Foundation

He further states that live release rates are a critical metric, but they have their weaknesses.¹⁴

- 1. It only looks at one aspect of animal welfare
 - a. Adoption is the preferred objective¹⁵; however, live outcomes for animals with no prospect of quality of life can be self-defeating.
- 2. A metric that is the outcome of division (one number divided by another) loses all information about scale. For example,
 - a. 9 animals adopted from 10 intakes is a 90% live release rate
 - b. 90,000 animals adopted from 110,00 intakes is an 81% live release rate
- 3. Achieving a high live release rate is not necessarily a measure of a successful operation. It can work against animal welfare as defined by the Five Freedoms if used in isolation. Animals that are severely ill may be kept alive, but in pain and suffering. Animals that have extensive lengths of stay may spend significant time in small quarters without sufficient exercise producing fear and distress. The Five Freedoms of animal welfare (as espoused by the ASPCA) are:
 - a. Freedom from hunger or thirst
 - b. Freedom from discomfort
 - c. Freedom from pain, injury, or disease
 - d. Freedom to express (most) normal behavior
 - e. Freedom from fear and distress
- 4. It is highly dependent on the input population. Limited intake shelters can take in only the healthiest and most preferred animals thus reducing the number of euthanasia and increasing adoption rates. AAS is an open admission shelter that must take in every animal regardless of health condition or breed. Poor health animals and unwanted breeds can be maintained but at significant cost and perhaps not to the ultimate benefit of the animal.

In summary, Dr. Haston states: ¹⁶

- Live Release Rate is a critical metric, but is not a sufficient measure of success. Shelters need counter balancing metrics like Length of Stay.
- Increasing Live Release Rates can cause a significant increase in length of stay, cost, and denial of service (ex. Due to insufficient capacity.)
- The optimal Live Release Rate for a shelter is highly dependent on the intake population and is unique for each community and situation.
- Shelter decisions greatly affect those around them. Changing an intake policy by limiting types of animals can have a very negative effect on other shelters in the community.¹⁷
- Animal welfare is much more than a Live Release Rate; shelters must measure their success on the sum total of all the factors that contribute to an animal's welfare.

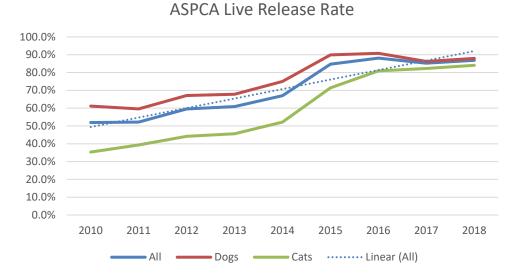
¹⁴ Ibid.

¹⁵ "Adoption is the best outcome for animals in welfare organizations because a home environment is most conducive to accommodating the five freedoms, which guide the creation of best practices." Page 1, **Adoption Best Practices**, Association for Animal Welfare Advancement.

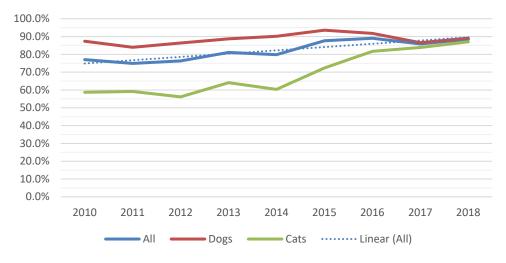
¹⁶ Haston, Roger, PhD.

¹⁷ Jan McHugh-Smith, President and CEO of the Humane Society of the Pikes Peak Region and formerly CEO of the Humane Society of Boulder Valley shared a story from when she was heading the Boulder Valley shelter. She stated that when Aurora passed its restricted breed ordinance, the next day they had people lined up and around the block to deposit their dogs there.

Other related measures include the ASPCA Live Release Rate and the ASPCA Save Rate. The ASPCA Live Release Rate tells us live outcomes as a percentage of the animals admitted. It does not tell us how Live Outcomes compare to All Outcomes. The ASPCA Save Rate tells us what percentage of animals admitted were not euthanized. It does not tell us what percentage of animals admitted had or will have a Live Outcome. ¹⁸ We present these rates for AAS below. Both rates have shown obvious improvement for all reported animals since 2010.



ASPCA Save Rate



¹⁸ National Federation of Humane Societies, "What is Your Rate?"

Beyond the Live Release Rates

We compared the results from Aurora Animal Shelter practices to best or leading practices from the American Society for the Prevention of Cruelty to Animals (ASPCA), the National Federation of Humane Societies (NFHS), the Asilomar Accords, and other experts in the field. We measured the results in the trend data that follows. The objective was to identify trends that are signs of an effective shelter operation in accordance with best or leading practices.

The ASPCA "expects animal sheltering organizations to make every effort to find adoption or placement options for the animals in their care, while also recognizing that **shelters require discretion to make the best decisions for those animals and the community in which they live, particularly in cases involving severe behavior or medical issues or dogs deemed dangerous under applicable law**. Specific minimum standards for the care of animals in shelters vary significantly among jurisdictions that have enacted them."¹⁹ (Emphasis added.)

The AAS has made efforts over the last five years to increase adoptions (such as establishing the Everyday Adoption Center) by expanding relationships with neighboring communities and other organizations. The charts that follow below show the positive impact of these efforts on the number of adoptions that occur through AAS. The live release rates provide valuable information, but they are not the only measures for how well Animal Shelters are operating. According to the National Federation of Humane Societies (NFHS):

The Asilomar Live Release Rate tells us what percentage of animals with an outcome left the facility with a Live Outcome (adoption, return to owner, etc.) The Asilomar Live Release Rate does NOT tell us how Outcomes (All or Live) relate to Intake. Overall, the Asilomar Live Release Rate does not provide insight regarding the Intake of an animal sheltering organization. Many animals may be admitted, and sheltered for a long period of time, and their status will not be reflected by this outcome focused measurement.²⁰

Per the NFHS²¹, there are many other data indicators that will better help an organization understand or evaluate their shelter operations and improve toward decreasing risk for shelter animals. The cited data indicators are in **bold** below followed by comments relating them to AAS operations.

• Admissions

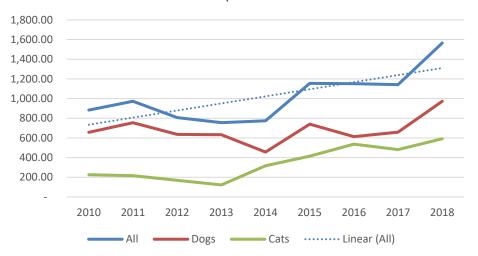
 Aurora Animal Shelter (AAS) is an open admission facility. They take in all animals brought to them, including the very sick and dangerous. They do not limit their intake to only those dogs that are considered more "adoptable" and thus improving their live release rates.

¹⁹ <u>https://www.aspca.org/about-us/aspca-policy-and-position-statements/position-statement-responsibilities-animal-shelters</u>, page 2 of 14.

²⁰ Ibid, National Federation of Humane Societies.

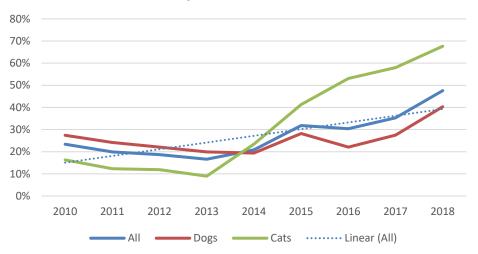
• Adoptions

 Adoption trend lines are up for AAS as shown in the chart below. The steady upward trend beginning in 2014 reflects their efforts to expand adoption opportunities to improve this trend. The sharp uptick in 2017 reflects the impact of the Every Day Adoption Center (EAC.)



AAS-Adoption Trends

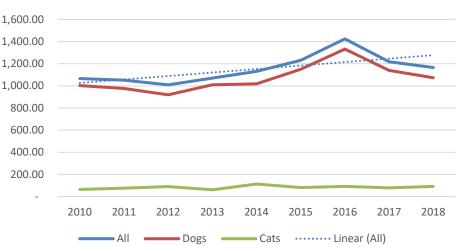
• Additionally, adoptions as a percentage of all intakes are up as well and have been trending upward since 2013.



AAS-Adoptions as a % of Intakes

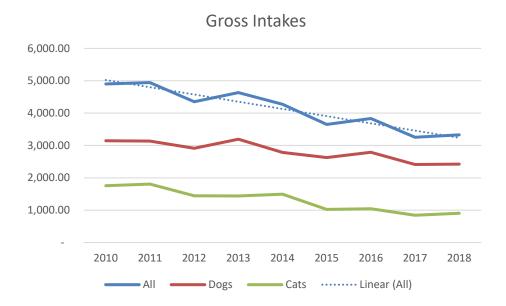
• RTO (return to owner)

• While the overall trend for the periods shown is upward, the trend in RTO since 2016 has been downward.



AAS-Return to Owner

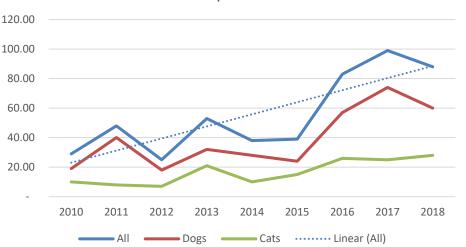
 This downward trend between 2016 and 2018 coincides with a general downward trend in intakes. The fewer animals taken in, the fewer animals to give back.



Animal Shelter Live Release Review

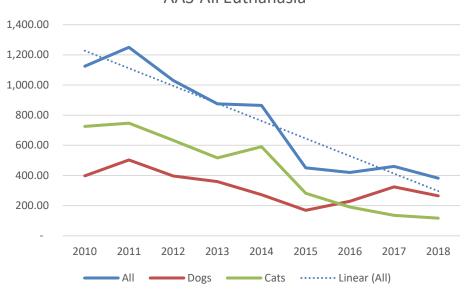
• Euthanasia

 Owner Requested Euthanasia has increased for both dogs and cats, but mostly for dogs hitting a high of 74 in 2017. According to Jenee Shipman, Shelter Manager, "Prior to 2015, we (AAS) did not waive fees for euthanasia requests and due to the high cost of our euthanasia fees people were forced to go somewhere else." Note that the sharp upward trend in this metric occurred in 2015 when fees could be waived for residents who could not afford them.



AAS-Owner Requested Euthanasia

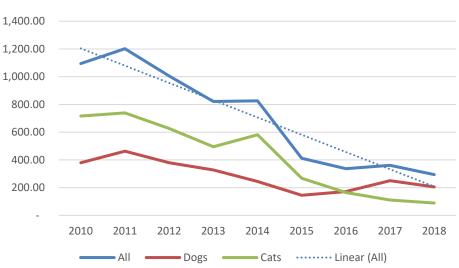
• In general, however, the trend line for all euthanasia has been downward since 2011.



AAS-All Euthanasia

Animal Shelter Live Release Review

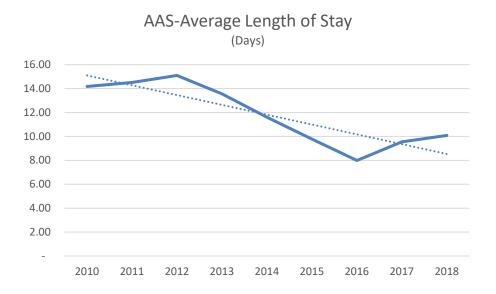
• The trend for Shelter Euthanasia (all Euthanasia net of Owner Requested Euthanasia) is down significantly since 2010.



AAS-Shelter Euthanasia

Length of Stay

• The average length of stay declined significantly between 2012 and 2016. It rose slightly in 2017 and remains relatively flat through 2018. Length of stay can reflect a growing population of difficult to adopt out animals.



Rate Manipulation Risks

When reviewing statistics for Animal Shelters, we must consider the risks of manipulating calculations to present the organization in a better light. We examined the AAS data related to some of these risks below.

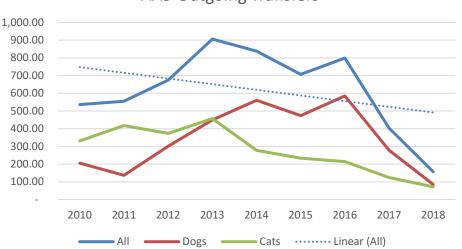
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2018-13NSAS

Risks of which to be aware²²:

- Using transfers to other shelters to increase live release rates
 - AAS: Outgoing transfers have declined significantly since 2013 (see our graph below)



AAS-Outgoing Transfers

- Using fosters to double count and increase the live release rates
 - The AAS does not include fosters in their rate calculations. Internal Audit recalculated the Asilomar Live Release Rates without including fosters and found no material difference between our calculations and the reported rates.
- How pregnant animals euthanized are accounted for (one or multiple)
 - According to Catherine Kirk, Inspection and Consumer Services Division, Colorado Department of Agriculture, "Euthanized pregnant animals are counted as one (the mother only) since any babies that may exist are not considered live intakes." AAS follows this practice.
- Bringing in other area's/shelters animals to increase live release rates
 - The AAS live release rate calculation does not include incoming transfers.
- Noncompliance of procedures for handling, using, and accounting for euthanasia drugs
 - AAS has satisfactorily passed its inspections by the Drug Enforcement Agency (DEA.)
- Noncompliance with overall euthanasia process
 - Our Internal Audit staff observed a euthanasia process and saw no evidence of non-compliance during the observation.
 - We did not conduct any further testwork in this area. We have no evidence, actual or anecdotal, that AAS is not compliant with their euthanasia processes.

²² Ibid, National Federation of Humane Societies.

To improve animal welfare, Dr. Roger Haston states that²³:

- Shelters have to recognize that they live in a system/community.
- What they do affects those around them.
- An organization's mission, vision, and values must be in context of the community.
- As shelters get better and better at what they do, they are faced with decisions and consequences that cannot be taken in isolation.
- Simplifying the world to a single attribute will ultimately drive organizations away from their intended mission.

²³ Beyond Labels: Understanding the True Impacts of Live Release Rate and Intake Policies; Haston, Roger, PhD.Page | 19Animal Shelter Live Release Review2018-13NSAS

Any numbers missing (ISS.XX) from the sequences in this report are included in the management letter.

Issue Details

ISS.8 – Add contextual data to performance measures

The Animal Shelter currently only reports the Asilomar Live Release Rate as a measure to monitor their performance. Research has shown that there are data indicators that better help an organization understand or evaluate their shelter operations and improvement toward decreasing risk for shelter animals than just the Asilomar Live Release Rate.

According to the National Federation of Humane Societies (NFHS):

The Asilomar Live Release Rate tells us what percentage of animals with an outcome left the facility with a Live Outcome (adoption, return to owner, etc.) The Asilomar Live Release Rate does **NOT** tell us how Outcomes (All or Live) relate to Intake. Overall, the Asilomar Live Release Rate does not provide insight regarding the Intake of an animal sheltering organization. Many animals may be admitted, and sheltered for a long period of time, and their status will not be reflected by this outcome focused measurement. **Emphasis added**

Per the NFHS, other data indicators include adoption trends, including adoptions as a percentage of intakes, return to owner data, euthanasia trends, including owner requested euthanasia, total euthanasias, and shelter euthanasias (total less owner requested), and average length of stay trends. The Shelter may have ideas of other data to report. All of this data is currently available in the Chameleon system. This additional data provides a more holistic view of the Animal Shelter operations.

Recommendation

We recommend that the Animal Shelter report additional performance information in addition to the Asilomar Live Release Rate to Management to provide a more holistic view of shelter operations.

Management Response

Animal Services currently receives daily management reports regarding daily intakes, outcome, and records. The Shelter Supervisor and the Field Supervisor along with the Administrative Specialist have identified the following additional performance information to be tracked on going: Length of stay, monthly intake numbers and types, monthly outcome numbers and types, monthly completed evaluations, monthly surgeries completed, quarterly vaccination clinic statistics-i.e. number of people served, animals vaccinated.

Estimated Implementation Date: July 31, 2019 *Issue Contributor*: Carol Valentine, Brittany DeZutter, and Anthony Youngblood *Issue Final Approver*: Malcolm Hankins

ISS.1 – Dual Initials on Logs

There is a lack of consistency on the physical drug logs. During the euthanasia walkthrough, Internal Audit noted that not all 'drawn by initials' in the physical drug log books contained two sets of initials. Some of the entries only listed the initials of the technician; other entries listed the initials of both the technician and holder. Within the Logging Fatal-Plus stand operating procedures (SOP), the Technician enters the initials of the technician and holder into the "By" field within Chameleon. The physical logs should reflect the same practice as the SOP requirement.

Recommendation

We recommend that for each use of Pre-euthanasia (sedation) solution and Fatal-Plus that the Technician documents the initials of the technician and holder on the physical log books. The Logging Fatal Plus SOP should be updated to reflect this process.

Management Response

Authorized staff will attend training for a new Euthanasia policy and SOP that will reflect that for each use of Pre-euthanasia (sedation) solution and Fatal-Plus the Euthanasia Technician will document the initials of the technician and holder on the physical log books. The Logging Fatal Plus SOP was updated on May 1, 2019 to reflect this practice.

Estimated Implementation Date: July 31, 2019 *Issue Contributor*: Dr. Graciela Guzman *Issue Final Approver*: Malcolm Hankins

ISS.4 – Documentation of Live Release Rate Process

The Animal Shelter SOPs do not specifically name the Asilomar Accords as the method of live release calculation. The SOPs also do not document that a pregnant euthanasia counts as one euthanasia in the Live Release Rate. While the Asilomar Accords are a common standard and best practice among shelters in Colorado, all practices employed by the Animal Shelter should be supported by and documented in policies, procedures, and/or SOPs.

Recommendation

We recommend Management create an SOP that documents the Asilomar Accords as the guidance used for Live Release Rate calculations and that the SOP also addresses how to account for pregnant euthanized animals.

Management Response

The Shelter Supervisor along with the Shelter Veterinarian will create an SOP that documents the Asilomar Accords as the guidance used for Live Release Rate calculations. The SOP will also address how to account for pregnant euthanized animals.

Estimated Implementation Date: July 31, 2019 *Issue Contributor*: Dr. Graciela Guzman and Brittany DeZutter *Issue Final Approver*: Malcolm Hankins

Appendix A

