# Recommendation Status Evaluation

Animal Services: Several recommendations implemented, some still in process

Multnomah County Auditor's Office
Jennifer McGuirk, County Auditor
August 2024

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What We Found

The Auditor's Office follows up on audit recommendations to support county government's accountability. Multnomah County Animal Services (Animal Services) implemented 8 of our recommendations and 7 are in process. We added a new recommendation that animals should be spayed and neutered prior to adoption.

What the Statuses Mean

- Implemented – Auditee has fully implemented, or auditee has resolved the issue to meet the recommendation's intent.
- In Process – Auditee has started implementation.
- Not Implemented – Auditee has not implemented, or does not intend to implement.

Status of Audit Recommendations
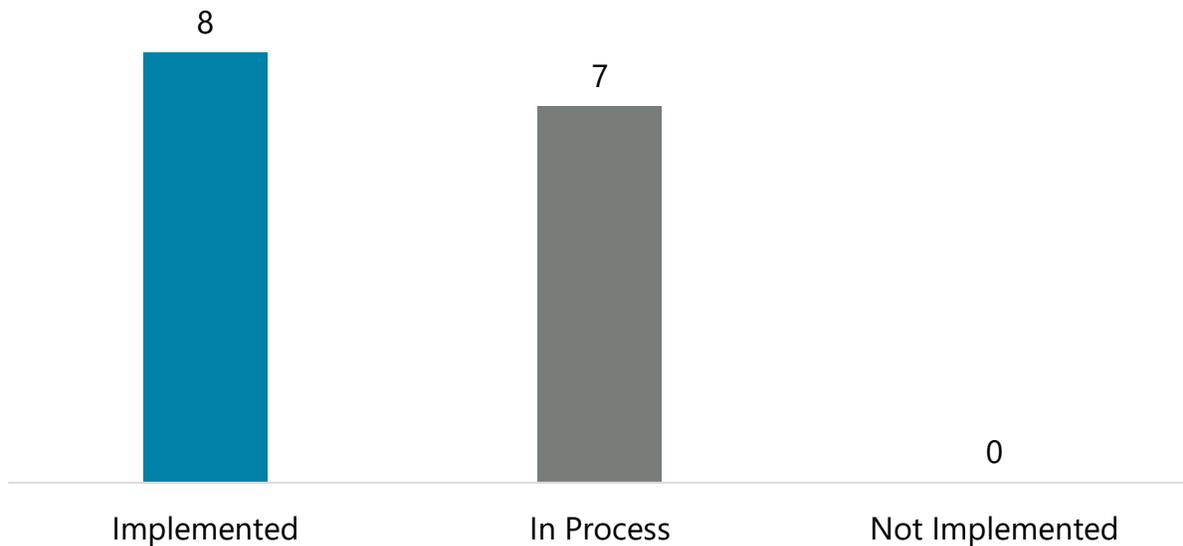
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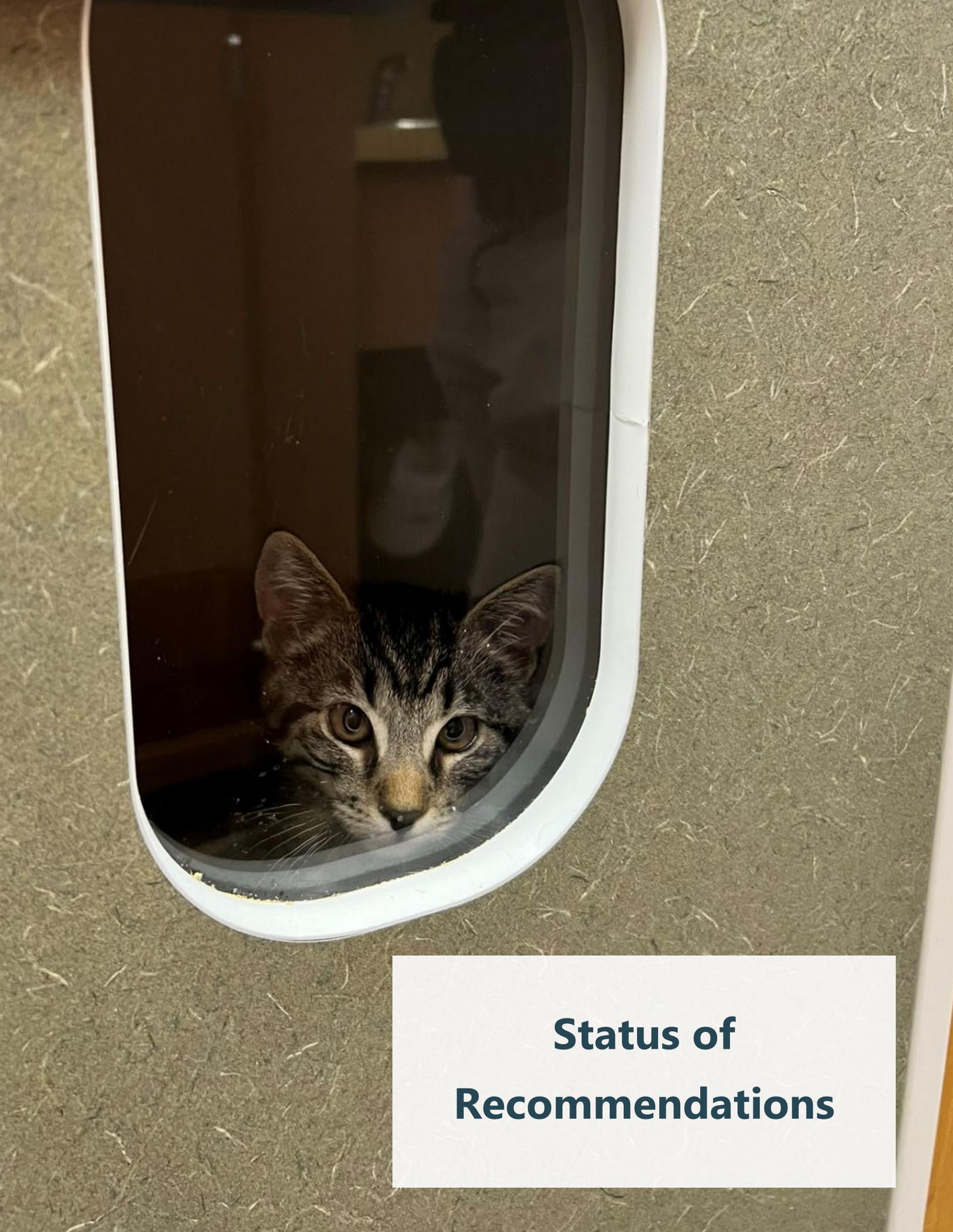
Status of Recommendations

Recommendations Implemented

Recommendation #1: Establish a policy that provides parameters for when it is safe to re-home animals.

Animal Services adopted a Policy for Placement Eligibility and Pathway in December 2023. The policy describes the behaviors and health factors that determine whether an animal is eligible for adoption, foster, or transfer to a partner organization. When we reviewed documentation on dogs with a bite history over a year period, we found that the policy is being followed. We focused our review on dogs because, while cat bites can be serious, there are far more deaths resulting from dog bites than from cat bites nationwide. Dogs that were euthanized had more severe bite incidents and/or multiple bite incidents. Dogs that were transferred to a partner organization or fostered had medical and/or behavioral issues and did not have severe or multiple bite incidents. Dogs that were adopted following a bite incident had a minor bite incident and/or the bite was provoked.

Recommendation #2: The new animal database should include mandatory fields that must be completed for every animal.

Animal Services worked with their database provider, ShelterBuddy, to include mandatory fields when adding a new animal to their database.

Recommendation #3: Conduct manual checks to ensure that there is not conflicting information in the animal records.

Animal Services created a process to check for errors.

Recommendation #4: Ensure that all euthanized animals are recorded in both the drug logs and the animal records database.

Animal Services has established a procedure for reconciling the euthanasia drug logs and their animal records database, ShelterBuddy. When we compared the drug logs to the database over a six-month period, we found only four errors out of 232 animals, and that the reconciliation process identified and corrected these errors.

Recommendation #5: The new animal database should produce reports that are accessible online by the public.

Animal Services worked with the Multnomah County web team to have found animals that are entered into ShelterBuddy automatically posted to the Animal Services website.

Recommendation #12: Provide a comprehensive enrichment program to all cats and dogs in every section of the shelter to ensure each animal receives daily social contact, mental stimulation, and physical activity.

Animal Services implemented an enrichment program, which includes:
- Music
- Species-specific toys that are rotated
- Scents that change daily
- Species-specific objects filled with food
- Playgroups
- Dog walks

Our remaining concern is related to enrichment documentation (see Recommendation #11).

Recommendation #13: Provide cats and dogs at the shelter for longer than 1 week with enrichment that increases as their length of stay increases.

Enrichment now begins when animals enter the shelter. Additionally, there is a rounds program where animals' needs are reviewed daily by a team of people. The enrichment program, combined with the daily rounds, meets the intention of this recommendation.

Recommendation #15: Institute a daily rounds program that includes, at a minimum, a rounds team involving people from different shelter units, daily decision-making that is clear and specific, and documentation of rounds' observations, decisions, and actions.

Animal Services implemented a daily rounds program. Staff from different shelter units meet daily to discuss animals with medical and/or behavioral needs. Healthy animals, who are likely to be adopted quickly, are usually not on the review list. The Association of Shelter Veterinarians' *Guidelines for Standards of Care in Animal Shelters* say that every animal should be reviewed daily. However, given the staff limitations, it is not realistic to spend staff time reviewing healthy, adoptable animals. Many staff on the daily rounds review team have important roles elsewhere in the shelter, and their time is best spent only reviewing animals with the greatest need.

Recommendations In Process

Recommendation #6: Document all behavioral concerns and discuss them with potential owners before adoption.

We observed some positive trends related to documenting behavioral concerns. We spoke with some staff who said that they received training about documenting their observations of animal behavior in ShelterBuddy and that adoption counselors disclose this information to those who want to adopt pets. Additionally, as part of their new enrichment program, staff document animal behavior during dog play groups.

We also found that there is room for improvement. A couple of staff mentioned being hesitant to enter information about an animal if they thought it could lead to the animal being euthanized. Also, some staff said they do not have enough time and access to computers to enter detailed information about animal behavior. Pet adopters echoed this sentiment. We sent a survey to people who adopted pets from Multnomah County Animal Services from March 1, 2023 through February 29, 2024. One of the questions was, "Did Animal Services staff tell you about any serious behavioral issues before adopting your pet?" Most people said their pet did not have serious behavioral issues. However, 39% of those who said that their pet had serious behavioral issues stated that no one from Animal Services told them about it before they adopted their pet.

Recommendation #7: Provide ongoing training to employees and volunteers on workplace safety issues, ranging from managing difficult conversations to workplace violence scenarios.

Animal Services is working with their department leadership on a new department-wide training initiative. While this has resulted in a delay of implementing this and related recommendations, management stated that making training improvements as part of the larger initiative will result in a more effective training program. As part of the department training initiative, management has identified required and optional

trainings for employee onboarding as well as ongoing trainings for each staff position. These trainings cover topics relevant to workplace safety issues.

Animal Services now has a security guard on duty seven days a week, and a couple of employees that we interviewed said that the guard's presence was helpful for workplace safety. They also felt staff would benefit from de-escalation training.

Recommendation #8: Provide shelter employees, particularly management employees, with training on County personnel rules, which require that the workplace be respectful, professional, safe, accepting of cultural differences, and free from inappropriate or abusive workplace behavior.

During an audit follow-up in 2018, we heard from multiple staff members who expressed concerns about their workplace. We did not hear similar concerns during this follow-up. Employees that we interviewed did not raise any concerns about workplace behaviors, and reported finding their workplace and managers to be respectful. However, we found that managers and employees have not completed many of the available trainings on fostering a respectful workplace.

We reviewed the training history of Animal Services employees for available trainings on county personnel rules, respectful workplace, and equity. We found that all managers have completed the required policy review for county employees, which includes reviewing the policies regarding harassment and discrimination. However, the county offers additional optional trainings for managers on workplace culture that could address the concerns we saw in our previous audit. Two managers have not taken the "Maintaining a Harassment Free Workplace" course, and no managers have taken the "Creating a Harassment Free Workplace for Managers and Supervisors" course. In addition, no managers have completed courses in the Department of Community Services' equity training series, and less than 15% of staff have completed a department equity training.

We understand that time for training is limited; however, staff and managers need to be provided opportunities to complete trainings that support a respectful and equitable

work environment. Department leadership recently hired an Equity Manager, who is responsible for improving employee access to trainings and has begun promoting equity trainings to employees.

Recommendation #9: Establish contingency housing to ensure that the shelter can accept all animals brought to it by County residents and Field Services' Animal Control Officers.

Animal Services staff significantly increased their foster home capacity, have held steady with the number of transfers to community partners, and there are some areas at the shelter that can be modified when they need additional housing.

However, this does not appear to have created enough capacity so that Animal Services is able to accept all animals. Animal Services' website states that it "is limiting shelter intake due to current limited staffing levels" and "only accepts sick or injured cats, and does not admit healthy adult cats." This appears to be a violation of Multnomah County Code 13.505, which states that Animal Services "shall operate, maintain or provide for an adequate facility to receive, care for and safely confine any animal." Some members of the public reported that Animal Services would not take stray cats they found, some of which were healthy, while others appeared unwell.

Recommendation #10: Implement a formal training program for new staff as well as ongoing training.

Management stated that full implementation of a training program has been delayed due to the wider Department of Community Services training initiative (see Recommendation #7). Animal Services has developed training plans for staff that were recently onboarded.

Several staff that we interviewed said there is an onboarding training for new staff in place, but mentioned a few areas for improvement including:

- more formal and thorough dog behavior training, as the current training is done externally via video and feels insufficient
- having onboarding training more spaced out, as staff receive a lot of training in their initial weeks on the job and may not be able to absorb all of the content effectively
- more ongoing refresher trainings

Recommendation #11: Maintain documentation of all enrichment provided, and track this information to ensure all animals receive enrichment consistently.

Animal Services created an enrichment program (see Recommendation #12), but management said they do not document enrichment because the large number of tasks would create a burdensome level of documentation. We understand management's concerns and do not want to create an onerous documentation requirement. However, there needs to be a mechanism for managers to keep track of gaps in enrichment tasks. Animal Services created laminated lists where staff can check off when they complete an enrichment task. This is a good system for tracking enrichment because it requires minimal staff time. However, we observed that not every enrichment activity was checked. When we asked management about it, they said that it was unclear if staff simply forgot to check the box or if the activity did not occur. This poses a problem because management does not have enough information to determine if they need additional staff to complete the work or if staff need to be reminded to check the box.

Recommendation #14: Comprehensively study total staffing needs, and advocate to the Board of County Commissioners for increased staffing as necessary to help protect the health of the animals in shelter care. This includes:

- Increasing staffing for cleaning and feeding to meet National Animal Care & Control Association guidelines.
- Ensuring adequate staffing to provide the shelter's animals with daily enrichment and consistently prompt behavioral health care.

At the request of Animal Services, the Board of County Commissioners approved 10 new full-time positions for the fiscal year 2024 budget.

We looked at staff and volunteer hours dedicated to cleaning and feeding for the months of May and June 2024. We found May to be, on average, adequately staffed to meet national guidelines, but when animal numbers increased in June, Animal Services did not have enough staff.

In May, Animal Services typically had more staffing hours than needed on Wednesdays, and was typically understaffed to meet the guidelines for Sundays, Mondays, and Tuesdays.

Animal Services did not fully staff their Animal Technician 1 positions, which are largely responsible for cleaning and feeding, until June. The number of animals in care typically increases beginning in the summer months, and even with the additional staffing Animal Services did not have enough staff to meet the guidelines. Animal Services was typically understaffed every day except for Wednesdays.

The Animal Technicians that we interviewed said that they generally have enough time to feed the animals and clean their housing, but mentioned challenges when understaffed.

See for enrichment.

New Audit Recommendation

Spay and neuter all eligible animals prior to adoption

This was not a recommendation from our previous audit, but it recently came to our attention that Animal Services is not spaying or neutering all animals before being adopted. In our previous audits, Animal Services was spaying and neutering animals prior to adoption. According to the Association of Shelter Veterinarians' *Guidelines for Standards of Care in Animal Shelters,* animal shelters should spay and neuter all pets before adoption. If a shelter is unable to do so, they must have a system to ensure the surgery is occurring soon after adoption.

Animal Services' has had fewer veterinary staff in recent years and has been unable to spay and neuter all animals before adoption. They began giving vouchers to pet adopters that could be used to have their pet spayed or neutered at participating community vet clinics. Animal Services does not follow up with pet owners to make sure they have spayed or neutered their pets. Animal Services is expected to increase vet hours this year, but it will still be well below vet hours in 2021 and earlier.

To determine how well the voucher process is working, we sent a survey to people who adopted pets from Multnomah County Animal Services from March 1, 2023 through February 29, 2024. We asked if people's pets had been spayed or neutered at the time of adoption. Only 48% said yes. Of those who adopted an unaltered animal, 68% said they used the voucher to have their pet spayed or neutered. Some pet owners experienced difficulties with the voucher, such as long waiting lists, which may have contributed to a lower spay and neuter rate. Additionally, some said that they did not receive a voucher.

We recommend that Animal Services spay and neuter all eligible animals prior to adoption by March 1, 2025.

Objectives, Scope, & Methodology

The objectives of this evaluation were to determine the status of recommendations from the 2016 Audit of Multnomah County Animal Services and the 2018 report *Animal Services: Important issues still need to be resolved*.

Auditors evaluated the status of recommendations based on interviews, documentation, and visits to the Multnomah County Animal Shelter.

Updating the Status of a Recommendation

During each audit our office conducts, we develop recommendations intended to improve government operations, particularly with regard to effectiveness, transparency, accountability, and equity. Our goal for evaluating the status of recommendations is to help ensure management implements these recommendations for improvement.

We recognize that after we publish an evaluation on the status of recommendations, management may fully implement a recommendation that we reported was in process or not implemented. Management can then provide evidence to the Auditor demonstrating why the recommendation's status should be changed in the Auditor's future reporting. The final decision on whether to change any recommendation's status rests with the Auditor.

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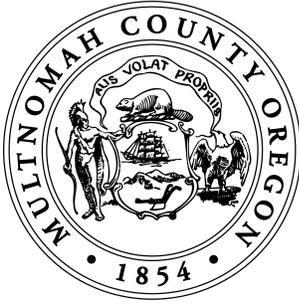
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August 16, 2024

Jennifer McGuirk, MPA, CIA
Multnomah County Auditor
501 SE Hawthorne Blvd., Room 601 Portland, OR 97214

Dear Auditor McGuirk,

I would like to thank the Multnomah County Auditor's Office for performing an assessment of the progress that Multnomah County Animal Services (MCAS) has made on audit recommendations from your office in 2016 and 2018. We appreciate the cooperation and communication from your staff to complete a comprehensive review. This timely assessment provides us an opportunity to see how far MCAS has come in a short amount of time.

We value your office's insights and are committed to continuous process improvement. We agree that all the action items that you identified in your last audit are either completed or in progress, and we have no disagreements on the status of each item. As the Chair, I have championed the Animal Services Strategic Plan, completed in September of 2023, as a way of comprehensively addressing all outstanding audit items and aligning with best practices. I am pleased to report that the plan is approximately 64% completed and that we continue to make regular and significant progress.

The overall assessment highlights that MCAS is well on its way to implementing the audit recommendations, especially in the area of enrichment, but we need to continue to focus on completing all the tasks. To that end, we would like to address a few of the items that are "in progress" below.

Recommendation #6: *Document all behavioral concerns and discuss them with potential owners before adoption.* Regarding the question of disclosure of behavior issues in the adoptions counseling process, MCAS trains its staff to disclose all information we know about an animal at the time of adoption counseling or before transfer to another agency or a foster home.

In reviewing the results of the auditor's survey, it is important to consider each animal's circumstances and length of time in our possession, and what we may learn during that stay.

MCAS's average length of stay is nine days and our minimum hold time per Multnomah County Code is 72 hours for animals that have no ID. Many animals are in care for a short amount of time and are in a new and stressful environment. Research shows it generally takes 3 weeks for an animal to settle in and their true personality to show.[1] Due to the length of time in our care and the animal's reaction to the new environment, any behavioral issues may not have been displayed while in our care. Additionally, many animals show different behavior in the home setting versus the behavior they demonstrate in a shelter environment.

MCAS staff review all information documented in animal records at time of adoption with the adoptee. This includes any medical notes, information related to stray or surrender profile and observed behaviors and interactions demonstrated during the pet's time in the shelter. This information is provided and available to all people who have adopted animals.

Recommendation #9: *Establish contingency housing to ensure that the shelter can accept all animals brought to it by County residents and Field Services' Animal Control Officers.*

Thank you for your concern about the capacity needs of the shelter. While space at the shelter is limited, MCAS has a solid system in place to manage capacity if and when the shelter is close to capacity, including working with our transfer partners to find additional available space. In terms of the quotes taken from the website, the Auditor refers to a 2022 news blog post about temporary changes that were made to limit intake regarding pandemic staffing issues. The blog post referred to by the Auditor is out of date and does not match current practice. We appreciate that you pointed it out and as a result we removed it so as not to create confusion.

To clarify, the county code does not require MCAS to take healthy stray cats into care. Section MCC 13.505 should be read with the understanding that the language is referencing impoundments. That section of the code speaks specifically to impoundment and the critical section reads, "The director shall operate, maintain or provide for an adequate facility to receive, care for and safely confine any animal delivered to the director's custody under the provisions of this chapter…for the conduct of necessary business concerning impounded animals." Subsection (B) further explains which animals are subject to impoundment: "Any animal may be impounded and held at the facility when it is subject of a violation of this chapter, when an animal requires protective custody and care because of mistreatment or neglect by its owner or keeper or when otherwise ordered impounded by a court, a hearings officer, or the director." Therefore, under this reading of the code, MCAS is not required to accept all animals that are brought to the shelter.

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[1] https://www.giveshelter.org/news/rule-of-three)

Recommendation #11: *Maintain documentation of all enrichment provided, and track this information to ensure all animals receive enrichment consistently.*

The report noted that while the tracking system is good from the efficiency perspective, there is some improvement needed in tracking and monitoring. MCAS Leadership will review this process as a part of its quality improvement program and address any process deficiencies that are identified.

New Recommendation: *Spay and neuter all eligible animals prior to adoption.*

MCAS supports the recommendation to spay and neuter all eligible animals. The current challenges to accomplishing this goal reside in the national shortage of veterinarians and certified veterinary technicians, and the physical limitations of the current shelter building. In a recent study[2] surveyed 143 animal sheltering organizations, 74% responded that they were short staffed for veterinarians and 91% reported having a backlog in spay and neuter surgeries.

While MCAS was able to hire a second veterinarian, we still face challenges in hiring certified veterinary technicians to support their work. MCAS began the spay and neuter voucher program to address this challenge, but this national shortage has impacted the ability for all community spay and neuter services providers to serve customers on a timely basis.

MCAS is committed to working to improve both internal capacity for surgery and to understand how we can make the voucher system more effective, including adding a pre-adoption surgery component to the voucher program. This element is in development with providers in the new contract cycle.

I again want to thank you for this thoughtful review and your continued collaboration. The MCAS team continues to make strides to complete all recommendations, and I appreciate your confirmation of their progress in this status evaluation.

Sincerely,

Jessica Vega Pederson

Jessica Vega Pederson
Multnomah County Chair

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[2] Susanne Kogut, Meredith L. Montgomery, Julie K. Levy et al. "The nonprofit veterinarian shortage: who will care for the pets most in need?", 02 February 2024, PREPRINT (Version 1) available at Research Square [https://doi.org/10.21203/rs.3.rs-3915925/v1]le

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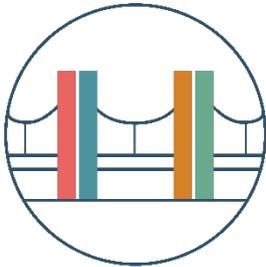
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**Multnomah County
Auditor's Office**

Date: August 20, 2024

To: Jessica Vega Pederson, Multnomah County Chair
        Serena Cruz, Multnomah County Chief Operating Officer

From: Jennifer McGuirk, Multnomah County Auditor

RE: COO's response to my office's follow-up hotline report and Chair's response to my
        office's evaluation of the status of audit recommendations, both regarding Animal
        Services

Dear Chair Vega Pederson and COO Cruz,

This memorandum resolves an area in the COO's recent response letter that could raise
questions about my office's role, and corrects an inaccuracy in the Chair's recent response letter.
There are also two areas where I think that the Board of County Commissioners needs to set
policy. I am noting those here and have CCed the Commissioners.

**1. COO's response letter to my office's report titled [Hotline tip report follow up: Animal
Services should use donation funds for their intended purposes](#)**

The response letter included:
*Oregon Revised Statute 297.765, Policies and Procedures for Local Government Waste Hotlines,
requires the auditor's office to determine in writing whether activities are occurring that constitute
waste, inefficiency, or abuse. In the June 2023 Hotline Tip report, the auditor's office did not claim*

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to find fraud, waste, or abuse of government position; rather, staff states that MCAS made "inefficient use of resources." We believe that assertion is incorrect.

My response:

Based on strong evidence, we found inefficiency in June 2023 and reported on this accurately to the Board and to the public. This year we published a follow-up report, as is my office's standard practice to let the public know the status of recommendations we have issued to the county government.

As in all of our hotline work, my office carried out our duties appropriately for the case resulting in our June 2023 report and the follow-up report we issued this month. We conducted a high-quality investigation focused on the facts. We then engaged in a rigorous internal quality assurance process to ensure that our statements were backed by sufficient, appropriate evidence. Our determinations are not mere assertions.

The response letter also included:
Animal Services' use of restricted funds is consistent with Board Resolution 2015-024.

My response:

My office's report demonstrated that the restricted-use accounts are to be used to supplement and expand Animal Services work, not to pay for expenses that had been covered by the general fund, such as a staff salary or the spaying and neutering of animals in the shelter's care. We used evidence including Board Resolution 2015-024, the testimony given when it was adopted, and Animal Services' website descriptions for the funds, as well as reviewing governmental accounting standards and the accounting itself.

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Ultimately, the Board should clarify the policy for how the funds are to be used and ensure this is clear to current and potential donors. I ask the Board to take up the question as to whether this Board Resolution has been operationalized appropriately.

2. Chair's response letter to my office's report titled [Recommendation status evaluation - Animal Services: Several recommendations implemented, some still in process](#)

The response letter included the following with regard to Recommendation 9 Establish contingency housing to ensure that the shelter can accept all animals brought to it by County residents and Field Services' Animal Control Officers:

- *In terms of the quotes taken from the website, the Auditor refers to a 2022 news blog post about temporary changes that were made to limit intake regarding pandemic staffing issues. The blog post referred to by the Auditor is out of date and does not match current practice. We appreciate that you pointed it out and as a result we removed it so as not to create confusion.*
- *To clarify, the county code does not require MCAS to take healthy stray cats into care.*

My response:
Your response does not reference the correct source of the quotes from the Animal Services' website. The quotes we included related to this recommendation were from the current *Found a pet?* webpage on the Animal Services' website, not a 2022 blog. Additionally, Animal Services' *Rehoming* webpage also currently states the following:
Voluntary owner surrendered pets are not currently accepted at this time.

One of the quotes we included stated that Animal Services only accepts sick or injured cats, and does not admit healthy adult cats. We also noted in our report that members of the public reported that Animal Services would not take stray cats, some of whom appeared unwell. The

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evidence demonstrated to us that Animal Services is not always taking in sick cats, which is concerning, as Animal Services is the county's only public animal shelter.

In our 2016 audit and 2018 follow-up, Animal Services characterized itself as being an open door shelter that was obligated to take in all county animals brought to the shelter, per county code. A reason for recommendation 9 was that Animal Services was not taking in all animals that county residents needed to surrender due to circumstances that unfortunately meant keeping the animal with their person was not possible.

Animal Services' decision to limit intakes appears to mark a shift in county management's approach as the county's only public shelter. This may also be a reason for the different interpretation of county code than during my office's audits. I encourage the Board to clarify the county code with respect to Animal Services' obligations and the county policy it wants Animal Services to follow.

CC:
Sharon Meieran, Commissioner, District 1
Jesse Beason, Commissioner, District 2
Julia Brim-Edwards, Commissioner, District 3
Lori Stegmann, Commissioner, District 4

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