OFFICE OF THE CITY AUDITOR

PERFORMANCE AUDIT

August 2017

Animal Health and Public Safety:

Community Vision and Improved Management Oversight Needed

CITY OF KANSAS CITY, MISSOURI

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August 30, 2017

Honorable Mayor and Members of the City Council:

This audit of the Animal Health and Public Safety Division (AHPS) was conducted at the direction of the City Council. Resolution 160680 directed us to examine the division's current practices and identify recommended practices with respect to operations and employee training. The audit focuses on the division's effectiveness in enforcing ordinances and achieving desired outcomes with respect to operations and employee training.

AHPS' focus on enforcement of animal-related code violations versus educating owners and resolving violations in the field is not always successful in achieving the desired outcome of improved animal welfare and public safety. Impounding animals puts them at risk of illness, stress, and abandonment; more than two-thirds of animals impounded in Kansas City for cruelty-neglect violations were not reclaimed by their owners. These owners are not educated on responsible pet ownership, yet could obtain another animal, which may continue the cycle of neglect. In some cases, such as lack of pet license violations, writing citations has failed to ensure compliance as pet owners can simply pay for citations without fixing the violation. Some cities are focusing their animal care and control efforts on educating owners about responsible pet ownership and connecting them with resources in order to resolve problems in the field.

AHPS and KC Pet Project (KCPP), which provides shelter services for the city, have a strained relationship, poor communication, and a lack of trust, which interferes with their ability to collaborate. A shared vision of how the city will protect the public and animals is needed to direct animal care and control activities of both organizations towards common goals. A shared vision developed through input and consensus from a broad range of stakeholders (AHPS, KCPP, councilmembers, animal welfare groups, etc.) would provide a framework for goals and serve as a benchmark of success. Stakeholders should consider incorporating the use of education and field resolution as an alternative strategy to some enforcement strategies that have not proved successful.

AHPS enforcement efforts are not consistently implemented. AHPS is not enforcing the city's dangerous dog registration and licensing requirements or consistently following up on some confirmed animal bite cases to ensure animals are quarantined. AHPS is not always conducting needed follow-up of cruelty-neglect complaints and violations or documenting investigations according to division policy. Management needs to address supervision of fieldwork and case documentation, inadequate division policies, and staff morale.

AHPS does not fully use or analyze the data it collects to manage or report its activities. Data analysis can be used to evaluate performance, allocate resources, and identify areas where policy changes and/or training is needed. New officer training and on-going training received by AHPS officers and supervisors covers most recommended topics, but management should ensure staff receives annual training.

We make recommendations to help ensure animal welfare and public safety by improving the working relationship between AHPS and KCPP; establishing a shared vision of animal care and control based on a consensus of city stakeholders; implementing policies and practices to consistently remediate animal code violations and document cases; analyzing performance data to provide accountability and assist in managing resources; and providing consistent and ongoing training.

The draft report was made available to the director of neighborhoods and housing services on August 4, 2017 for review and comment. His response is appended. We would like to thank the Animal Health and Public Safety staff for their assistance and cooperation during this audit. We would also like to thank Kevin D. Hearst, Sr., Animal Service Supervisor/Chief Cruelty Investigator, Animal Services and Enforcement. DeKalb County, Georgia for his expert review of case documentation. The audit team for this project was Terry Bray, Jonathan Lecuyer, and Sue Polys.

Douglas Jones
City Auditor

Animal Health and Public Safety Division: Community Vision and Improved Oversight Needed

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Introduction

Objectives

We conducted this performance audit of the Animal Health and Public Safety Division under the authority of Article II, Section 216 of the Charter of Kansas City, Missouri, and at the direction of the City Council. Resolution 160680 directed the city auditor to conduct an audit of the Animal Health and Public Safety Division's current practices and identification of recommended practices with respect to operations and employee training.

A performance audit provides "findings or conclusions based on an evaluation of sufficient, appropriate evidence against criteria. Performance audits provide objective analysis to assist management and those charged with governance and oversight in using the information to improve program performance and operations, reduce costs, facilitate decision making by parties with responsibility to oversee or initiate corrective action, and contribute to public accountability."[1]

This report is designed to answer the following question:

- Has the Animal Health and Public Safety Division implemented processes and provided training consistent with recommended practices?

Scope and Methodology

Our review focuses on the Animal Health and Public Safety's effectiveness in enforcing ordinances and achieving desired outcomes with respect to operations and employee training. We did not review KC Pet Project shelter operations. Our audit methods included:

- Reviewing state statues, city ordinances, and written department policies and procedures to identify Animal

[1] Comptroller General of the United States, *Government Auditing Standards* (Washington, DC: U.S. Government Printing Office, 2011), p. 17.

Health and Public Safety operational and training requirements.

- Comparing recommended animal care and control and management practices to AHPS division practices and policies to determine whether AHPS implemented recommended practices.

- Interviewing AHPS's manager, supervisors, and animal control officers and observing staff perform their duties to identify current practices and training.

- Interviewing councilmembers, Kansas City Pet Project staff and a board member, animal welfare advocates, and the city prosecutor to identify any concerns with regards to AHPS practices and training.

- Reviewing the outcome of animals impounded for cruelty-neglect between May 1, 2016 and November 14, 2016 to determine the number of pets returned to their owner.

- Engaging a subject expert to review five cases of animals impounded by AHPS for cruelty-neglect violations to determine whether there were equally effective alternatives to remediate violations.

- Comparing citations between June 1, 2016 to March 31, 2017 for failure to license a pet to database of pet licenses to determine whether pet owners obtained licenses following receipt of citation.

- Reviewing AHPS's documentation of dogs declared potentially dangerous or dangerous by the city to determine whether AHPS was ensuring their owners' compliance with city code registration and licensing requirements.

- Reviewing animal bite reports between January 1, 2017 and April 30, 2017 to determine whether animal control officers ensured the quarantine of identified animals.

- Reviewing judgmental samples of cruelty-neglect cases to determine whether animal control officers are performing follow-up to ensure remediation of cruelty-neglect violations and following division policies and procedures when documenting cases.

- Analyzing AHPS computer aided dispatch (CAD) call data between May 1, 2016 and March 31, 2017 to determine response times, call types, and call trends.

- Reviewing calculations of response times reported by AHPS to determine whether the calculations were accurate.

- Comparing time of calls for service received to current animal control officer (ACO) work shifts to determine whether ACO schedules match call volume.

- Reviewing AHPS citation data between May 1, 2016 and March 31, 2017 to calculate the number of citations by code violation and by animal control officer to determine what violations were enforced with citations and whether enforcement was consistent by officer.

- Comparing animal care and control recommended training topics to training received by the AHPS Division field staff and reviewing frequency of training to determine whether staff are receiving recommended training.

We assessed the reliability of call data by reviewing controls over data entry and comparing CAD system records against other source documents and databases. We assessed the reliability of citation data by comparing the data to source documents. We determined that both sets of data were reliable for the purposes of this report.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. No information was omitted from this report because it was deemed privileged or confidential.

In conducting our audit work, we identified some issues related to AHPS use of spray foam that needed immediate attention by management. We communicated this information to the director of neighborhoods and housing services in a separate memorandum.

Background

Animal Health and Public Safety Division (AHPS). AHPS is a division of the Neighborhoods and Housing Services Department performing animal care and control services for the city. The division is staffed by 16 animal control officers, 2 special investigators, 4 supervisors, an assistant division manager (vacant), and a division manager. The division responds to about 16,000 calls for service per year. Animal control officers respond to the following calls for service:

- Animals running at large
- Stray animals
- Neglect and cruelty of animals
- Injured animals
- Wildlife in homes
- Animal bites of humans

AHPS manages the city's contract with the private non-profit partner, Kansas City Pet Project (KCPP) that operates the city shelter.

KC Pet Project (KCPP). KCPP has a public-private partnership[2] with the city to run the city's shelter. KCPP's responsibilities include caring for animals impounded by AHPS and other animals found or relinquished in Kansas City, Missouri, improving animal adoption rates, fundraising to increase revenues available for the shelter operations, and leveraging additional human capital by enlisting volunteers.

[2] A public private partnership is a "contractual agreement between one or more governments/public agencies and one or more private sector or nonprofit partners for the purpose of supporting the delivery of public services or financing, designing, building, operating and/or maintaining a certain project." Alexandru V. Roman, Ph.D., Assistant Professor, California State University San Bernardino, "A Guide to Public-Private Partnerships (PPPs): What Public Procurement Specialists Need to Know," NIGP, the Institute for Public Procurement, 2015, p. 1.

Findings and Recommendations

Summary

The Animal Health and Public Safety Division's focus on enforcement of animal related code violations versus educating owners and resolving violations in the field is not always achieving the desired outcome of improved animal welfare and public safety. Impounding animals for cruelty-neglect violations frequently results in pet owners abandoning their pets. The owners do not learn responsible pet ownership, yet can obtain another animal and continue the cycle of neglect. AHPS's emphasis on writing citations for animal violations does not always achieve resolution of the violation. As is the case with violations for lack of pet license, the pet owners can simply pay for citations without remediating violations.

Other cities are focusing animal care and control practices on educating owners on responsible pet ownership and connecting them with resources in order to resolve problems in the field. Field resolution allows the animal to avoid the risks associated with impoundment and may provide better long-term outcomes.

AHPS and KC Pet Project (KCPP) are partners in delivering the city's animal care and control but a tense relationship, poor communication, and a lack of trust interfere with their ability to collaborate. The tension between the two partners is common between the sheltering function and the animal control function due to differing focuses. However, the interconnectedness of AHPS and KCPP's work requires the two to collaborate effectively with a common vision for the city's animal care and control.

AHPS, KCPP, and other stakeholders need to create a shared vision for animal care and control in Kansas City. To ensure animal welfare and public safety the shared vision should provide a framework for goals and serve as a benchmark of success. Stakeholders should consider incorporating the use of education and field resolution as a strategy, as other cities have, as an alternative to some enforcement strategies that have not proved successful.

The AHPS enforcement efforts are not consistent. AHPS is not enforcing the city's dangerous dog registration and licensing requirements or consistently following up on some confirmed animal bite cases to ensure animals are quarantined. AHPS is not always conducting needed follow-up of cruelty-neglect complaints and violations. Animal control officers (ACOs) are not consistently documenting investigations according to division policy. The division should address inconsistencies in enforcement and documentation through improved management and policy.

AHPS management has additional opportunities to analyze response times, call volume, and citation data that can be used to evaluate performance, allocate resources, and identify areas where policy changes and/or training is needed.

New ACO training and on-going training received by AHPS animal control officers and supervisors covers most recommended topics, but management should ensure animal control officers and supervisors receive annual training.

City and Stakeholders Should Determine Collaborative Vision for Animal Care and Control

The Animal Health and Public Safety Division (AHPS) focuses on enforcement of animal related code violations but the enforcement does not always achieve the desired outcome of pet owners' compliance of the city's animal code and ultimately animal welfare and public safety. Impounding animals for cruelty-neglect violations frequently results in the pet owner abandoning the animal rather than the owner learning how to care properly for their pet. Additionally, AHPS's emphasis on writing citations for animal code violations does not always achieve code compliance as pet owners can sometimes simply pay for a citation without remediating the violations.

Other cities are focusing animal care and control practices on trying to educate owners on responsible pet ownership and connect them with resources in order to resolve problems in the field. Field resolution allows the animal to avoid the risks associated with impoundment and can provide more long-term outcomes.

AHPS and KC Pet Project (KCPP) are partners in delivering the city's animal care and control but a tense relationship, poor

communication, and a lack of trust interferes with their ability to collaborate. AHPS, KCPP, and other stakeholders need to create a shared vision for animal care and control in Kansas City. The vision should provide a framework for goals and serve as a benchmark of success. Stakeholders should consider incorporating the use of education and field resolution, as other cities have, as an alternative to some enforcement strategies that have not proved successful.

AHPS's Mission Focused on Enforcement

Kansas City's AHPS Division currently focuses on enforcement rather than education or field resolution of animal code violations. While AHPS does not have a formal mission statement, the division manager describes the mission as "to improve the overall delivery of animal health through the enforcement of ordinances." AHPS made writing citations, which is an enforcement method, a priority in how it carries out its mission. Since at least 2012, animal control officers have been expected, as a measure of their performance, to issue a minimum of 25 summonses (citations) per month.[3] Additionally, AHPS policy requires animal control officers to check every dog or cat owner they respond to for current city pet licenses. For every violation observed, the officer must issue a summons to the owner. Exceptions to the policy must be approved by a supervisor.[4]

Animal control officers also tend to impound animals as an enforcement strategy for cruelty-neglect violations. According to AHPS policy, animal control officers have discretion in some situations to resolve violations (lack of food, water, shelter, etc.) through educating citizens and giving them time to remediate violations.[5] However, AHPS supervisors stated that external pressures have influenced impounds to occur more frequently than education. Supervisors said AHPS tends to err on the side of what they consider is best for the animals, which is seizing the animal from the owner, rather than attempting to gain compliance through pet owner education.

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[3] *Animal Health & Public Safety Divisional Procedure*, "#P-1, Quantity of Work Performance Standards for Animal Control Officers," revised April 4, 2012, p.1.
[4] *Animal Health & Public Safety Divisional Procedure*, "#G-1, Conducting License Checks," revised January 8, 2015, p.1.
[5] *Animal Health & Public Safety Divisional Procedure*, "#G-2, Cruelty Investigations," August 30, 2016, pp.1, 3.

Animal Cruelty-Neglect

Neglect of an animal is a pet owner's failure:

- to provide adequate food, water, shelter, health care, and grooming to prevent dangerous matting;
- to provide freedom from continuous chaining; unsanitary conditions; debris, junk, or dangerous protuberances; or
- to prevent animals from being tangled or injured by a restraint.

Abuse of an animal is a person:

- beating, tormenting, teasing, overloading, overworking, cruelly ill-treating or otherwise abusing an animal.

Source: Code of Ordinances, Kansas City, Missouri, Sec. 14-16 (a) and (b).

To determine whether AHPS could have opportunities to resolve some violations in the field rather than impounding, we asked a subject expert[6] to review the documentation for five cases where AHPS impounded the animal for a cruelty-neglect violation and the animals were returned to their owners on the same or next day after impoundment. We asked him whether there were alternatives to impounding that would be more or equally effective for those cases.[7]

His review found that in three cases the officers did have alternatives to impoundment. For example, one of the cases he reviewed showed pictures of a healthy looking dog in a shaded backyard. The animal control officer's report stated that the temperature was 81 degrees; the dog could not enter its shelter because the door was closed, and two water bowls contained dirty water. Our expert said that the equally effective alternative to impounding was to place the dog in an adequately shaded location preventing possible dehydration, leave information concerning the violation and the remedy, schedule a follow-up visit before shift end to make contact with owner, and notify the supervisor of these actions. He said the officer could also attempt to leave a message with a neighbor. In general, he said if it is possible to secure the animal without impounding it, it would be better to leave the animal and return later to educate the owner.

[6] Kevin D. Hearst Sr., Animal Service Supervisor/Chief Cruelty Investigator, Animal Services and Enforcement. DeKalb County, Georgia.

[7] We did not ask the subject expert to determine whether the animal control officer followed city code in impounding the animal.

Impounds and Citations Are Not Always Effective in Resolving Code Violations

Impounding animals for cruelty-neglect violations and writing citations for lack of pet licenses does not always have the intended outcome of resolving a code violation. Impounding animals for cruelty-neglect violations has risks and does not always ensure future compliance. Shelters expose impounded animals to contagious illnesses due to close proximity to other animals. Animals at the shelter also experience stress due to the noisy environment, separation from their owners, and unfamiliar surroundings. Less than a third of the animals impounded by AHPS for cruelty-neglect, between May 1, 2016 and November 14, 2016 were reclaimed by their owners. Some owners do not reclaim their animals because they cannot afford to pay the impound fees or citations. If an owner cited for cruelty-neglect simply were to replace the impounded animal with another animal or owns other animals, the cruelty-negligent behaviors may never be addressed or corrected.

Kansas City pet owners found guilty of not licensing their pets frequently do not obtain a pet license. NACA guidelines recommend and city code requires dogs and cats to be licensed.[8] A license helps ensure pets are up-to-date on their rabies vaccine, provides proof of ownership, and helps reunite lost pets with their owners – minimizing the number of animals unnecessarily impounded.

In our review of 155 pet owners who were found guilty of not licensing their pets in Kansas City, Missouri, between June 2016 and March 2017, only about half of owners obtained licenses following the citation.

Education and Field Resolution Is Emerging Practice in Animal Care and Control

Animal care and control practices implemented in other municipalities have focused on achieving compliance of animal laws through education and connecting people with resources. Some municipalities have developed programs to educate citizens on responsible pet ownership and given animal control officers tools and resources to resolve problems in the field. (See Exhibit 1.)

[8] Code of Ordinances, Kansas City, Missouri, Sec. 14.20.

Exhibit 1. Municipalities Focusing Animal Control Efforts on Education and Providing Resources

Municipality	Animal Care and Control Practices
Santa Cruz County, CA	Believing that many people do not care about getting animal citations, animal care and control provides education and resources to residents. Preventative patrols of officers and volunteers go door-to-door. They provide free resources like flea prevention, leashes, pet toys, and food, which are given out to residents. The division has established a designated squad that can be called in to fix a fence to prevent an animal escaping a yard.
Austin, TX	The city's animal control function focuses on connecting people with information and resources. Officers write warning tickets with a window to comply while sharing information and helping families obtain resources. Officers are given tools and equipment to do things like fix a hole in a fence. Officers build trust with the public and are seen as resources. Using data, they identify zip codes with high numbers of strays and deliver tags and microchips to those areas. Officers make strong efforts to find the owner of loose dogs, rather than impounding, reducing the animals' risks and reducing the city's costs.
San Antonio, TX	"Comprehensive Neighborhood Sweeps Initiative" (CNSI): Data is used to identify areas of high concentration of stray animals and bite cases. Volunteers and animal control officers go door-to-door with information about responsible pet ownership and information about free or low cost licensing, vaccinations, and pet sterilization from city partners. Following the sweeps, the department begins picking up strays and issuing citations in the area.

Source: Todd Stosuy, Field Services Manager, Santa Cruz County Animal Shelter and NACA Board member, "Beyond Animal Control: Daily Community Education and Proactive Community Animal Control," National G2Z Summit, September 2015; Maria Alvarado of PawEdu and April Moore and Lee Ann Shenefiel, Austin Animal Center, Maddie's Fund, "Lifesaving Animal Control Policies," American Pets Alive! Conference, 2016, http://www.maddiesfund.org/lifesaving-animal-control-policies.htm?p=topic36; Lisa Norwood, "Embracing Innovation in Animal Control," NACA News, January/February 2013.

These programs address situations where the owner lacks knowledge about caring for their animal and responsible pet ownership or lacks the resources to care for pets. Enforcement is still a necessary tool and having animal laws and enforcement processes in place can help solve animal problems when voluntary compliance does not work as well as act as a deterrent.[9]

NACA supports animal care and control professionals education of pet owners in their role of protecting the public and animals. NACA's code of conduct states, "animal care and control professionals must exercise a consistent and wise use of discretion, based on professional animal control competence, to preserve good relationships and retain the confidence of the

[9] Stephen Aronson, *Animal Control Management, A New Look at Public Responsibility*, Purdue University Press, 2010, p.252.

public. When difficulty in choosing between conflicting courses of action arises, it is important to remember that education or advice, rather than enforcement action or arrest, (which may be correct in appropriate circumstances), can be a more effective means of achieving a desired outcome."[10]

AHPS and KC Pet Project Need to Work Together

AHPS and KCPP are partners in delivering the city's animal care and control but a tense relationship, poor communication, and a lack of trust, interfere with their ability to collaborate. Tension between a municipality's sheltering function and animal control function are common due to the shelter's focus on animal welfare and field services' emphasis on public safety and enforcement. However, the interconnectedness of AHPS's and KCPP's work requires the two to collaborate effectively.

Differing views of animal care and control has contributed to a tense public-private partnership. AHPS's focus is public safety and animal health through enforcement of city ordinances. The city's shelter operator, KC Pet Project, focuses on animal welfare, saving the lives of healthy and treatable pets. These differing views on animal care and control have created tension between AHPS and KC Pet Project. KC Pet Project has questioned the AHPS manager's decision to have a dog euthanized that he declared dangerous. KCPP staff has testified in municipal court against the interests of the city in an animal enforcement case. AHPS management was unreceptive to a request from the KC Pet Project board president to reconsider the use of impoundment in certain situations.

Although the tension between AHPS's enforcement function and KC Pet Project's sheltering function is not unique to Kansas City, the conflict has negatively affected the partners' communication, trust, and ability to collaborate.

AHPS's and KC Pet Project's relationship lacks productive communication and trust. Although AHPS and KCPP are public-private partners in providing the city's animal care and control services, their communication is frequently unproductive. Communication, which requires problem solving, plays out in strings of emails between senior management of AHPS and KCPP and tends to result in unsatisfactory outcomes for one or both organizations. Regular communication of partners is recommended for successful public-private

[10] *Code of Conduct*, NACA Guidelines, National Animal Care and Control Association, p. 3.

partnerships. Regular communication should assist partners in recognizing common interests and help ensure productive decision-making and better outcomes. [11]

AHPS's and KCPP's relationship lacks mutual trust. Some AHPS staff believe KCPP wants to take over the animal control field services from city staff and are afraid of losing their jobs. KCPP management acknowledges they would like to run field services. Because KCPP has questioned AHPS's enforcement decisions, AHPS management, with input from the city prosecutor, no longer gives KCPP access to investigation records. As a result, KCPP staff only hears animal owners' side of the story when they come to reclaim their impounded pet. If owners complain that AHPS treated them unfairly, KCPP sometimes questions AHPS enforcement decisions. Trust between public-private partners is critical to a lasting and successful partnership. Both parties must trust the other's commitment to the success of the relationship.

AHPS's and KCPP's strained relationship could have a negative effect on animal welfare, public safety, and organization productivity. Poor communication between AHPS and KCPP could have serious consequences to animal welfare and public safety if the two are ineffective when communicating decisions about euthanizing animals, releasing impounded animals to owners with animal cruelty-neglect violations, or treating injured animals. The tense relationship also affects employee morale. Animal control officers report low morale from feeling scrutinized by KCPP management and worry about being reported to their manager. Low morale can result in low productivity, absenteeism, and turnover.

Kansas City's animal welfare community is aware of the tension between the two organizations and the tension has been highlighted in the media. In our interviews with animal welfare advocates, several advocates said AHPS and KCPP do not get along and believe the conflict is impacting the city's ability to provide animal care and control. A local news station ran a story with the two partners blaming one another for mistakenly releasing a dangerous dog.

Because AHPS's and KC Pet Project's roles are interdependent, the partnership requires a collaborative working relationship. Success of AHPS enforcement/public

[11] Mary Beth Corrigan, Jack Hambene, William Hunut III, Rachelle L. Levitt, John Stainback, Richard Ward, Nicole Witenstein, "Ten Principles for Successful Public/Private Partnerships," Washington, D.C.: *ULI-the Urban Land Institute*, 2005.

safety activities rely on KC Pet Project's actions. KCPP cares for animals impounded by AHPS; serves as the face of the city in interactions with citizens who reclaim their impounded pets; and when necessary, euthanizes animals deemed dangerous by AHPS. The city benefits from leveraging KCPP's expertise and financial resources to implement a no-kill shelter, which reduces the need for euthanasia of healthy pets.

To run the shelter successfully, KC Pet Project must rely on the city to provide timely and accurate information about animal health/injuries and ownership of impounded animals to ensure proper health care and facilitate reunification with owners. Because KC Pet Project is the face of the city in interactions with citizens, KC Pet Project needs the city to follow a consistent and fair enforcement process so that KCPP can seamlessly provide good customer service to owners and educate them about responsible pet ownership. Additionally, AHPS needs to communicate decisions clearly to KCPP about when impounded animals can and cannot be released to their owners.

To be successful in their partnership, AHPS and KCPP must understand each other's objectives and accept that they are legitimate. The leaders of both organizations must be willing to work together to resolve conflicts and meet the other's needs. Meeting regularly to discuss key initiatives, resolve conflicts, and identity potential areas of collaboration should improve AHPS and KC Pet Project's relationship. Because of the communication issues and lack of trust on both sides, the meetings should be mediated by an outside party skilled in meeting facilitation and conflict resolution.

To improve the working relationship between AHPS and KC Pet Project, the director of neighborhoods and housing services should require regular meetings between AHPS and KC Pet Project leadership, facilitated by an outside party skilled in meeting facilitation and conflict resolution, to discuss key initiatives, resolve conflicts, and identify potential areas of collaboration.

Shared Vision of Animal Care and Control Is Needed

AHPS, KCPP, and other stakeholders need to create a shared vision for animal care and control in Kansas City, as the current focus on enforcement strategies is not necessarily achieving desired outcomes and AHPS and KCPP, the two major stakeholders, do not share the same vision. A shared vision

will help determine what direction they want to see the city go to ensure animal welfare and public safety. Stakeholders (AHPS management and field staff, City Council members, KCPP, animal welfare groups, etc.) should develop, through consensus, a shared vision of the future for animal care and control. Including all stakeholders in the process should help establish buy in and help each to see what their individual roles are. The vision should provide a framework for goals, serve as a benchmark of success, and include a strategy for implementation. Stakeholders should consider incorporating the use of education and field resolution as a strategy, as other cities have, as an alternative to some enforcement strategies.

To help ensure the city achieves desired animal welfare and public safety outcomes, the director of neighborhoods and housing services should establish a process for stakeholders to develop the city's vision for animal care and control.

Enforcement Efforts Not Consistently Implemented

The AHPS division is not enforcing the city's dangerous dog registration and licensing requirement and is not consistently following up on some confirmed bite cases to ensure animals are quarantined. Cruelty-neglect cases are not always receiving needed follow-up by the division and follow-up is not always required to ensure violations are fixed.

ACOs are not consistently documenting investigations according to division policy, which can affect animal and public safety. Management needs to address case follow-up, documentation, and morale.

Dangerous Dog Ordinance Not Enforced

The AHPS is not enforcing dangerous dog registration and licensing requirements. The National Animal Care and Control Association recommends municipalities have ordinances to address dangerous dogs in an effort to protect the community, which the city does. The supervisor of animal health and public safety may declare a dog dangerous[12] or potentially

[12] Dangerous dog means a dog that: (1) Has inflicted severe injury on a human being without provocation on public or private property; or, (2) Has killed a domestic animal, or other animal protected under federal, state or local rules without provocation while off the owner, keeper or harborer's property; or, (3) Has been previously found to be potentially dangerous, the owner or keeper received notice of such and the dog again

dangerous.[13] City code requires registration and licensing of dogs declared potentially dangerous or dangerous.[14] A certificate of registration for a potentially dangerous or dangerous dog requires an enclosure to confine the dog, warning signs on the property, a microchip, and a surety bond or liability insurance.[15] To obtain a license for the dog, the owner pays an annual fee.[16] Any potentially dangerous dog or dangerous dog, for which a license and certificate of registration, or renewal has not been obtained by its owner or the owner fails to follow the provisions of the declaration is subject to impoundment.[17]

Our review of AHPS's documentation of potentially dangerous and dangerous dog declarations shows that since 2011, 16 of 19 owners of potentially dangerous or dangerous dogs who kept their dogs never obtained the license or certification required by city code. Three owners met the licensing and certification requirements the first year of the declaration, but have not maintained their certification and license in subsequent years. As far as AHPS knows, the dogs are still in the city.

AHPS management said they send out renewal notices and do some follow-up visits to owners of potentially dangerous and dangerous dogs but the division does not document the notices and follow-ups. The division manager said that owners rarely comply with all of the requirements. He said AHPS will follow up if they continue to receive complaints on the dog.

Dangerous dogs that are not adequately supervised and controlled may pose a threat to people and other animals. The registration and licensing requirements on dangerous dog owners imposed by the city help ensure public safety.

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aggressively bites, attacks, or endangers the safety of human beings or domestic animals without provocation. Code of Ordinances, Sec. 14-1.

[13] Potentially dangerous dog means a dog when unprovoked: (1) Inflicts bites on a human being or domestic animal or other animal protected under federal, state or local rules, either on public or private property; or, (2) Chases or approaches a person upon a street or a public grounds in a menacing fashion or apparent attitude or attack, a dog with a known propensity, tendency, or disposition to attack without provocation, to cause injury or otherwise threaten the safety of humans, domestic animals, or other animals protected under federal, state or local rules; or, (3) An offspring, older than eight weeks, later born to a dog found to be a dangerous dog. Code of Ordinances, Sec. 14-1.

[14] Code of Ordinances, Sec. 14-29(a)(1) and (4).

[15] Code of Ordinances, Sec. 14-29(a)(2).

[16] Code of Ordinances, Sec. 14-29(a)(4).

[17] Code of Ordinances, Sec. 14-29(b)(12) and (13).

In order to ensure public safety, the director of neighborhoods and housing services should ensure that owners of dogs declared potentially dangerous and dangerous have complied with city code.

Bite Quarantines Not Always Enforced

AHPS is not consistently following up on human bite cases to ensure quarantine of the animal. NACA guidelines state that a strict rabies quarantine of rabies-suspect animals be mandatory and enforceable.[18] According to city code, any dog, cat, or ferret that bites a human must be quarantined for 10 days for observation of signs of rabies.[19] AHPS supervisors stated that ACOs are to continue trying through day 10 to quarantine the animal. AHPS policy says that in the event that an owner of a bite animal fails to cooperate in getting the animal confined, warrants for their arrest may be issued.

We identified 12 bite cases between January 1, 2017 and April 30, 2017 where the animal control officer confirmed a dog bite occurred and the dog owner's name or address was known, but the animal control officers did not ensure the dog was quarantined. There was no documented decision by the officer or management not to pursue further action. In only one of these 12 bite cases, the animal control officers confirmed the dog had been vaccinated for rabies. In all of the cases, the ACO tried at least once to contact the owner according to case documentation. In two of the bite cases, the officer documented a second attempt and in another case attempted a third time to quarantine the dog. The circumstances the ACOs encountered while trying to quarantine the dog or confirm the quarantine included the officers did not make contact with the owner or see the dog; the owners were uncooperative with the quarantine; or the owner planned to quarantine the dog at their own vet but the ACO did not document that they confirmed the quarantine.

Quarantining and observing animals for 10 days following a bite is important because there is no way to test for rabies in live animals. The observation is to ensure no signs of rabies develop. "Rabies-infected animal can only transmit the disease after clinical signs have developed and once these signs have developed, the animal will die within 10 days."[20] The

[18] *Rabies Vaccinations Guideline*, NACA Guidelines, p. 63.
[19] Code of Ordinances, Sec. 14-42.
[20] "Rabies Facts and Prevention Tips," American Humane, https://www.americanhumane.org/fact-sheet/rabies-facts-prevention-tips/, accessed 7/5/17.

quarantine period helps individuals bitten avoid painful post-exposure rabies vaccinations if not needed. We found no documentation that AHPS notified the bite victim in these 12 cases that the dog was not quarantined.

In order to ensure public health, the director of neighborhoods and housing services should ensure dogs that have bitten a human are quarantined as required by city code.

Cruelty-Neglect Cases Do Not Always Receive Needed Follow-up

AHPS practice does not require animal control officers to make a follow-up visit to investigate a cruelty-neglect complaint if the officer is not able to view the animal and talk to the owner on the first visit. AHPS does not always require rechecks when needed to ensure impounded animals do not return to the same cruelty-neglect. In cases where the animal control officers do not impound animals for cruelty-neglect violations but instead allow the animal to remain at the home and give owners time to fix violations, ACOs are not consistently performing rechecks to ensure owners have fixed the violations.

Animal control officers do not follow-up on cruelty-neglect complaints when the officer does not observe the animal and no contact is made with the owner. As recommended by NACA, city code prohibits animal cruelty-neglect.[21] AHPS policy states that complaints in which there is any possibility that the animal is in danger or is suffering, abandoned or dead from mistreatment must be investigated promptly. If the owner is not at home and the animal has not been observed, an officer will post a notice to the door of the residence informing the owner to contact the office within 24 hours.[22]

According to the AHPS division manager, despite what the policy says, officers do not follow up on cruelty-neglect calls if they do not hear back from the owner after 24 hours. He said they do not have adequate staffing to revisit these properties and only do so if they receive another complaint.

According to our subject matter expert, the officers should make a second attempt to see the animal and make contact with the owner.

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[21] Code of Ordinances, Sec. 14-16.

[22] *Animal Health & Public Safety Divisional Procedure*, "#G-2, Cruelty Investigations," August 30, 2016, p.1-2.

Follow-up of cruelty-neglect complaints by officers when the animal is not seen is important and especially critical in complaints of animal abandonment. An animal may be abandoned in the house where the officer cannot see it and if it is abandoned the owner would not be home.

To ensure the welfare of animals, the director of neighborhoods and housing services should require follow-up on cruelty-neglect complaints when the animal has not been observed.

AHPS does not always require rechecks when needed to ensure animals do not return to the same cruelty-neglect. According to AHPS's policy addressing communication between AHPS and KCPP, officers can choose whether AHPS staff must recheck a property to ensure violations have been abated before the animal can be released to its owner. AHPS's policy is not clear on what violations would or would not require a recheck. We found that violations that resulted in impound were very similar for cases that officers required a recheck and cases where officers did not require a recheck.

We reviewed a sample of cruelty-neglect impound cases, some that required rechecks and some that did not. In the cases that the ACOs did require rechecks, the violations included no shelter, lack of medical care, unsanitary conditions, and one for temperature below freezing and no water. The violations in the cases that the ACOs did not require rechecks were very similar including violations for no shelter, lack of medical care, and unsanitary conditions. In the cases in our sample, if the owners did not fix the violations before the animals return home, there is no positive outcome to balance the impoundment risks (illness, stress, euthanasia) to the animal. In addition, the improved welfare that may have been achieved by impounding the animal is lost if the animal just returns to the same conditions.

To ensure the welfare of animals that are impounded for cruelty-neglect violations, the director of neighborhoods and housing services should ensure cruelty-neglect violations are resolved before returning impounded animals to their owners.

In some cases when the ACOs leave the animal with the owner rather than impound, they do not recheck to confirm animal owners fixed violations. If an officer observes a violation of adequate care, (lack of shelter, lack of water, entanglement, etc.) and the owner is present, it is up to the discretion of the officer to allow the owner more time to

correct the situation or seize the animal and bring charges. If the owner is not present, and violations observed do not cause an imminent danger to the health of the animal, the officer may leave the animal and give the owner a notice that clearly lists the violations that must be resolved and states the ACO will recheck for compliance within the next 24 hours.[23]

We reviewed a sample of 25 cases, investigated by 10 different ACOs, where officers documented that they observed cruelty-neglect violations, but did not impound the animal. Eight of the officers did not perform the required recheck on 12 of the cases. When the recheck is not performed, there is no assurance that the owner has followed through and fixed the cruelty-neglect violation.

To ensure the welfare of animals, the director of neighborhoods and housing services should ensure cruelty-neglect violations have been resolved when the animal is not impounded.

Investigations Not Adequately Documented

ACOs are not documenting investigations according to division policy. AHPS management directs officers to fill out investigation reports after all impounds and investigations. Management stated that every call answered by an ACO is considered an investigation with the exception of wildlife calls and stray animal calls that do not involve cruelty. On cruelty-neglect calls, officers are to complete the investigation report and the cruelty checklist. The report should document the date and a description of the incident and animal. The policy requires the ACO to take photographs of every animal, all the injuries, the property and living conditions, all violations, and absence of violations.[24]

We reviewed 26 cruelty-neglect cases to determine whether officers were documenting cases according to AHPS policy and management directive. In most of the cases, the officers did not complete a required investigative report or cruelty checklist and did not include many of the required photographs. (See Exhibit 2.)

[23] *Animal Health & Public Safety Divisional Procedure*, "#G-2, Cruelty Investigations," August 30, 2016, p. 3.
[24] *Animal Health & Public Safety Divisional Procedure*, "#G-2, Cruelty Investigations," August 30, 2016, pp. 2-3.

Exhibit 2. Documentation Completed in Cruelty-Neglect Cases, May 1, 2016 to November 13, 2016

Documentation	Yes	No	NA
Investigation report	10	16	0
Cruelty checklist	8	14	4
Photographs of the animal	12	9	5
Photographs of the property and/or living conditions	12	14	0
Violation photos	8	6	12

Source: Cruelty-neglect case files.

We brought the lack of investigation documentation to the attention of management at the end of February 2017. We reviewed an additional sample of AHPS cases from April 2017 and found continued documentation problems.

AHPS division policies do not clearly state all documentation requirements. AHPS policies do not address the current expectation that all investigations require a completed investigation report. Instead, a supervisor sent the directive in the form of an email to all ACOs and special investigators. By including documentation requirements in the division's written policies, signed by the division manager, ACOs are assured it is the approved policy; ACOs can locate the policy more easily; and it helps ensure that as new officers are introduced to the division they receive the policy.

Complete and accurate case documentation is critical to Animal Health and Public Safety's effectiveness. Documentation of investigations, even when officers determine there are no violations, demonstrate that the city has done its due diligence in protecting animals and people. Well-documented cases also provide a roadmap for the next officer called to the same address. Descriptions of the animals present, the animals' environments, descriptions and names of persons the officers spoke to, and the information conveyed are all relevant to how officers handle a subsequent call to the same property. If an officer sees from previous case documentation that the owner has already been warned for a violation, the next officer may want to progress to a higher level of enforcement. Investigative notes can also alert the next officer to be cautious of safety issues like an aggressive animal or owner. Case documentation is also necessary for the city to prove violations in court.[25]

[25] The city prosecutor who handles animal related violations said she is satisfied with the case documentation she reviews for cases involving citations. The animal control officer has the discretion to

In order to ensure investigations are adequately documented, the director of neighborhoods and housing services should ensure Animal Health and Public Safety policies and procedures contain all documentation requirements for each case type.

Consequences from Lack of Case Follow-up and Inadequate Documentation

AHPS's lack of case follow-up and poor documentation have negative consequences to the health and safety of animals, result in wasted staff time, bring criticism on the division and city, and lower employee morale. The case described below illustrates the consequences to some abandoned dogs when an investigation did not have proper follow-up and was poorly documented. (See Exhibit 3.)

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decide which cases to write citations on and therefore determines on which cases the prosecutor will see documentation.

Exhibit 3. Consequences of Lack of Investigative Follow-up and Inadequate Documentation

Investigation Date	Description of Investigation
First complaint	Two officers (one was in training) responded to a complaint of an abandoned dog. The officers noted in their investigative report that they could hear dogs barking inside. They documented that they were unable to make contact and left a notice at the residence. There is no documentation that the officers returned to the residence to check on the dogs inside the house that were possibly abandoned.
18 days later	One of the officers from the first visit answered a complaint to the same property regarding five dogs that were allegedly abandoned in the home with no food or water. The officer wrote in his investigative report that he was unable to make contact with the owner and left a notice. He stated that he heard "some canine inside." The officer said he would recheck the residence in three days. There is no case documentation that he rechecked the property and his activity report does not show the officer revisiting the address in three days.
54 days later	A third officer answered a complaint to the same property regarding abandoned dogs. He did not complete the required investigative report. The only documentation from the officer is his closure of the case in PetPoint with the result from the drop down menu "Unable to Make Contact/Left Notice."
13 days later	City Auditor's Office brought the complaints to the attention of the AHPS division manager out of concern that dogs may be abandoned and suffering in the house without appropriate action being taken by animal control officers. Two AHPS supervisors and a fourth animal control officer visit the property. Dogs are heard barking in the house and there is a strong smell of urine at the front door. The supervisor spoke to a neighbor and confirmed that the dogs' owner stops by the house every day but does not live there. AHPS initiated a warrant to enter the house and check on the welfare of the dogs inside.
1 day later	The fourth officer reached the property owner by phone and tried to convince her to show him the dogs and the inside of the house to check their welfare. The owner was uncooperative. She stated that a previous inspector already saw the dogs a few months ago and knew they were okay. The fourth officer continued to recheck the house until a warrant was obtained.
7 days later	AHPS officers and supervisors served the warrant at the residence. Four unsocialized dogs are taken from extremely unsanitary conditions inside the home and impounded to KC Pet Project.

Source: AHPS case documentation, AHPS management, and auditor observation.

The officers that did not follow up on the complaints contributed to the length of time the animals were exposed to unhealthy conditions. If the officers had followed up on the first complaint, the dogs could have been removed three months earlier. The third officer's lack of documentation made it difficult to know whether there was any validity to the owner's claim that she had already let an officer check the welfare of

the dogs. The three officers who did an incomplete investigation wasted city resources as the fourth officer and two supervisors had to return to the house and redo the investigation.

These poorly investigated and documented cases are the types that the media reports, which results in lower public opinion of the city. Finally, the morale of the officers that do follow division policies and procedures, follow up on their cases, and complete required documentation is lowered because the inadequate investigations done by other officers reflect poorly on them.

Management Needs to Address Case Follow-up, Documentation, and Morale

Management's supervision of field activities is not sufficient to ensure proper follow-up and documentation. When asked what quality assurance they perform on animal control officers' fieldwork, some supervisors said they try to observe their officers in the field unannounced once or twice a week; however, there is no documentation to support this. Some ACOs we spoke to said they rarely or never see some of the supervisors or the division manager in the field supervising or observing an officer's work. By reviewing officers work in the field, supervisors should be able to help ensure ACOs are impounding animals when the benefit to the impound outweighs the risks to the animal and correctly identifying and following through on situations that require it.

Although supervisors said that they review investigation forms, intake forms, and activity sheets submitted by the officers, the large number of missing reports and insufficient documentation show that management is not adequately reviewing officer documentation. One supervisor told us he does not need to check the quality of his officers' reports because they are seasoned staff. Supervisors should regularly review documentation completed by officers, including experienced officers, to help ensure officers that lack the experience are correctly trained and experienced officers do not become lax in their documentation.

According to some AHPS staff, there are serious problems with employee morale resulting from lack of proactive management and unprofessional behavior of some officers and supervisors. Some staff state there is favoritism toward officers by some supervisors, which is why supervisors have not addressed poor

performance. Requiring animal control officers, special investigators, and supervisors to sign a code of conduct should set the division's expectations for professional behavior and influence employee performance and clarify management expectations. The National Animal Care and Control Association's code of conduct emphasizes officers' actions should be above reproach in using their authority and discretion. It states that officers' duties should be performed impartially and with reasonable discretion; officers should preserve good relationships with the public and treat colleagues with respect and consideration.

In order to improve officer and supervisor performance and ensure accountability the director of neighborhoods and housing services should ensure that:

- Supervisors regularly conduct field reviews of the ACOs assigned to them and regularly review the ACOs' case documentation.
- All staff reads and signs a code of conduct and is held accountable for that conduct.

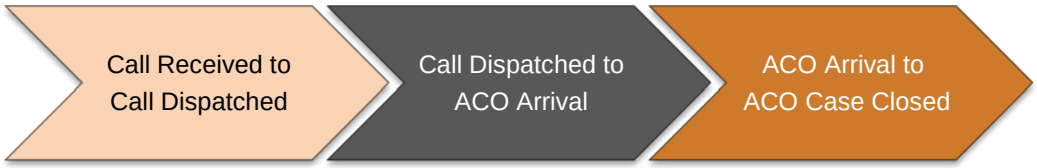
Ongoing Analysis of Data Can Inform Management Decisions

Analysis of AHPS data can help evaluate timeliness of ACO's response to calls for service, assess staff scheduling in relation to call volumes, and identify enforcement patterns.

Tracking Response to Calls for Service Provides Accountability

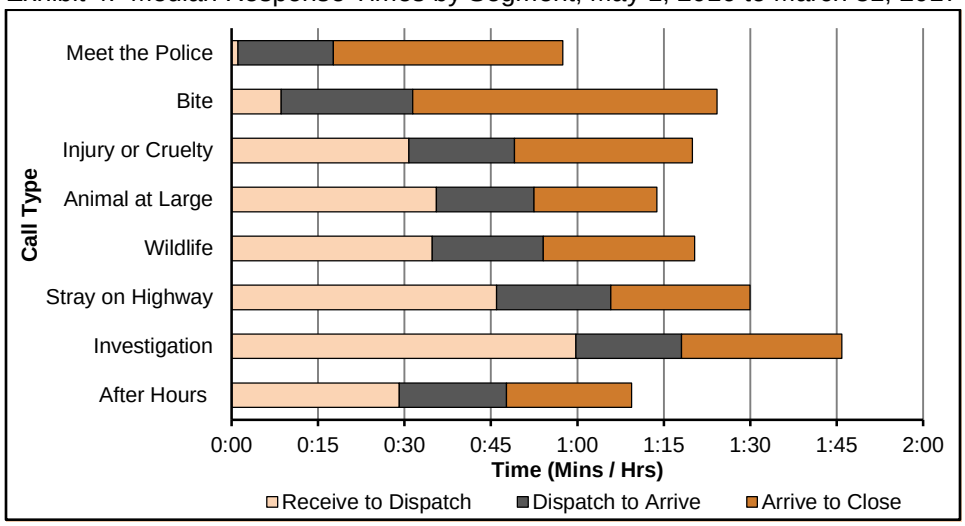
AHPS should analyze all segments of response time to determine whether arrivals follow their call prioritization and to assess responsiveness from citizens' perspective. In order for the response time data to be most useful, AHPS management should work with KCPD to ensure calls that come directly to KCPD are categorized by call type; response times are calculated from complete datasets; and calls without arrival times are excluded from the calculation.

AHPS only reports one of three segments of response time. AHPS should analyze each segment of a call in order to evaluate the timeliness of the response. The response to a call for service has several segments including:



Analyzing the segments allows management to determine whether ACOs are arriving on the scene in accordance with their prioritization.[26] AHPS only reports response time from dispatch of the call to the ACO's arrival on the scene which does not reflect the responsiveness from the caller's perspective or the amount of time an ACO spent on a call. We used AHPS's response time data provided by KCPD to break response time out by its segments.[27] (See Exhibit 4.) AHPS segment analysis shows ACO arrival at the scene roughly following dispatch priorities. ACOs arrive at the scene on a call to meet the police the fastest, which is their highest responsiveness priority. The median time to dispatch a bite case is 8 minutes and it then takes an additional 22 minutes for the ACO to arrive on scene after being dispatched. Additional analysis of time spent on calls can be used to assess whether ACOs are allocating their time in a manner that supports division goals and desired outcomes.

Exhibit 4. Median Response Times by Segment, May 1, 2016 to March 31, 2017



Source: KCPD CAD data and City Auditor's Office analysis.

[26] Response time goals by case severity are established in prioritization by *Animal Health and Public Safety Divisional Procedure "#R-2*, Call-Taking/Dispatch/Cell Phone Protocol," August 3, 2010.

[27] In the following sections we discuss limitations of the CAD data we used in our May 1, 2016 to March 31, 2017 analysis.

In order to review AHPS responsiveness from citizen perspective and determine whether AHPS's responsiveness matches its prioritization and expectations, the director of neighborhoods and housing services should track response times to a call for service by each response time component.

Calls received directly by KCPD for animal related services are not categorized by call type. Most calls for animal related services are answered by 311. Call takers assign the call type and pass the call along to KCPD to dispatch an animal control officer by priority. (See Exhibit 5.) KCPD answers animal related calls during the hours that 311 is closed. Calls received directly by KCPD are coded as "808-Animal Incident" and dispatched by KCPD to on-duty animal control officers. Calls coded 808 are comprised of all call types. KCPD staff said calls received directly by KCPD are not categorized by call type per a management agreement with the city. Because 20 percent of AHPS calls are received directly by KCPD, those calls need to be coded with an accurate type in order to assign the correct priority and provide meaningful analysis of call by type.

Exhibit 5. KCPD Dispatch Priority by Animal Call Type

Call Type	Priority Level
A01 Meet the Police	11
A02 Bite	13
A03 Injury or Cruelty	20
A04 Animal at Large	20
A05 Wildlife	20
A06 Stray on the Highway	20
808 Calls Received after hours by KCPD	40
A10 Stray Confined	50
A11 Investigation	50
A12 Recheck	50
A13 Transport	50
A15 Animal Health Administration	50

Source: KCPD monthly report.

In order to make dispatch prioritization and analysis of response time by call type more accurate, the director of neighborhoods and housing services should work with KCPD so that phone calls answered after hours by KCPD are categorized with the same call types used for animal service calls received by 311.

Response times are calculated from an incomplete dataset. Between May 1, 2016 and March 31, 2017, KCPD used 10,842 records to calculate response time; however, there

were a total of 14,879 animal related calls responded to by ACOs during that period. AHPS reports the response time calculation provided by KCPD, which is based on the incomplete dataset. KCPD staff told us they did not know why the response dataset used for the response time calculation was incomplete. KCPD has recently changed dispatch systems and is working on determining what dispatch data it will be able to provide to AHPS.

In order to calculate response times from a complete dataset, the director of neighborhoods and housing services should analyze the completeness of dispatch data received from KCPD before relying on it for data analysis.

Response time calculations for dispatch to arrival include calls without an arrival time. KCPD included calls without an arrival time in the calculation, assuming the calls had a response time of zero. However, response time cannot be calculated if arrival time is unknown. By including calls without an arrival time, the median response times is reported as shorter than it actually is. For example, in September 2016, AHPS reported a median response time of 13.82 minutes from call dispatch to ACO arrival on the scene. The response time is actually17.33 minutes. AHPS reports this response time analysis publicly through KCStat.[28]

In order to provide accurate dispatch to arrival response times, the director of neighborhoods and housing services should work with KCPD to ensure the calculation of response time from dispatch to arrival does not include calls without an arrival time.

Call Demand Analysis Can Help Determine Staffing and Scheduling

Current scheduled staffing levels do not always match call volume. In order to use staffing resources when most needed, staffing levels should rise when there are more calls and decrease when there are fewer calls. Quantifying the average number of calls for service by time of day and day of week identifies the bulk of the daily workload for an ACO. The number of staff needed per average call is not a one to one ratio because staff has more duties than responding to calls for service, calls may take longer than the hour they are reported

[28] KCStat is a data-driven, public-facing initiative focused on improving the efficiency and effectiveness of city services. KCStat public meetings monitor the city's progress toward goals, as measured through established metrics and completion of strategic objectives.

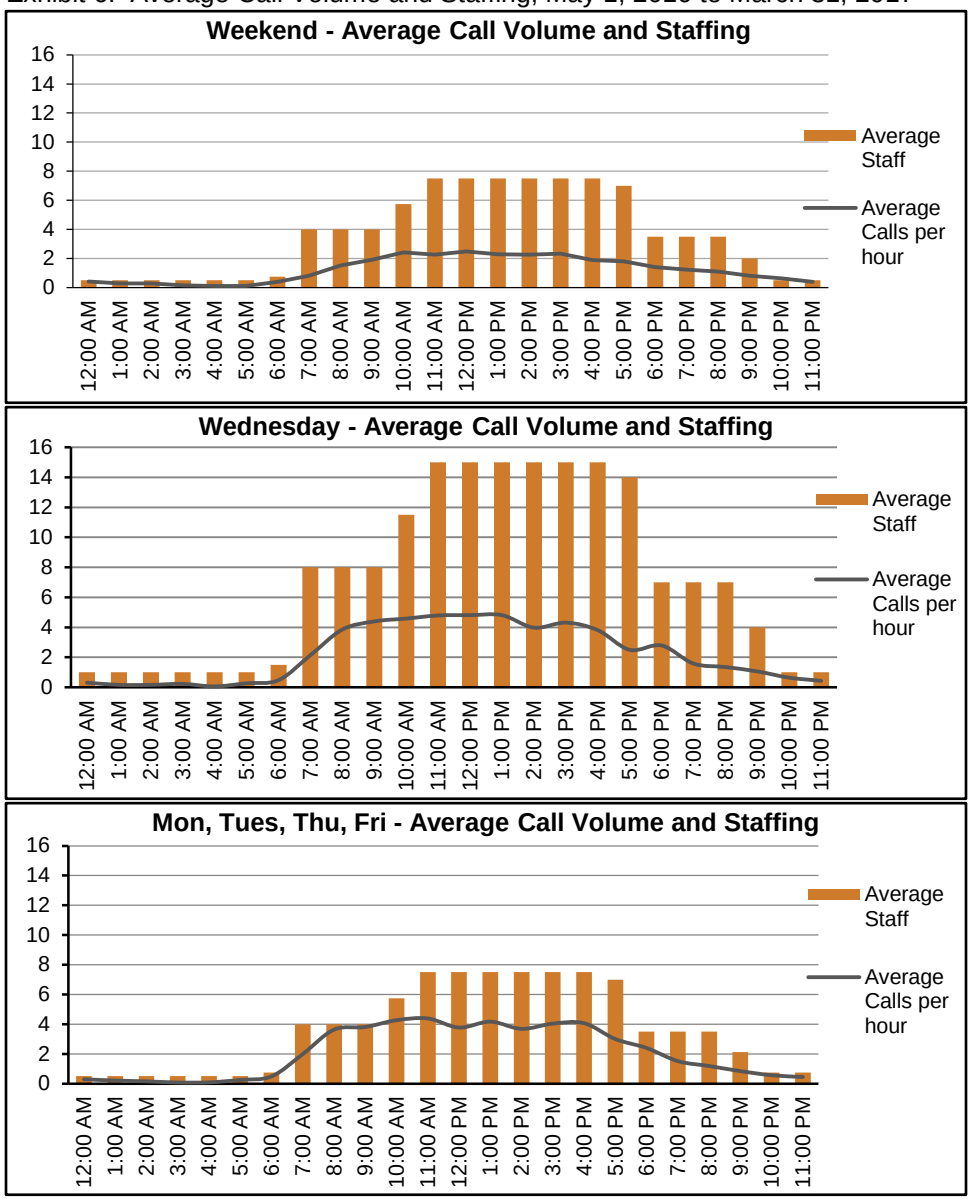
in, and community expectations for services provided may entail other non-call related work. After AHPS management determines their minimum staffing level needed per call, management can utilize the call volume analysis to ensure staff is efficiently scheduled to meet demand.

Currently, AHPS management attempts to spread their staffing throughout the week to meet call demands, however no analysis of call data has been completed. Our analysis of average call volume by time of day and day of week shows that there are times when the patterns of call volumes and staff may not reflect one another.

For example, staffing on Monday, Tuesday, Thursday, and Friday at the beginning of the day (8:00AM-10:00AM) is low compared to the middle of the day. Weekend staff level is the same as Monday, Tuesday, Thursday, and Friday, however the weekend receives half as many calls on average but has the same number of staff scheduled. On Wednesday, all staff work, yet the call volume is no different than other weekday averages. These times when call volume and staffing do not reflect one another provide opportunities for management to consider rescheduling staff to more efficiently use resources when responding to citizens' calls for service. (See Exhibit 6.)

In order to effectively use department resources and meet the demand of calls for service, the director of neighborhood and housing services should analyze average calls for service data to help determine appropriate staff scheduling.

Exhibit 6. Average Call Volume and Staffing, May 1, 2016 to March 31, 2017[29]



Source: CAD Data, AHPS Staff Schedule, and City Auditor's Office analysis.

Analysis of Citation Data Identifies Patterns in Enforcement

AHPS management does not analyze citation data to identify patterns in enforcement activity. Differences in the enforcement rate by violation and ACO can help management determine where to focus education, how each officer is

[29] Staffing includes only ACOs on duty. Supervisors and special investigators are not included in these tables.

choosing to apply policies, and where AHPS might need policy changes and/or training. Management only analyzes citation data to determine whether ACOs have met the division's performance goal of issuing 25 citations per month.

Our citation analysis found significant differences in the frequency of citations by ACO. For example, ACO 11 wrote twice the number of citations as ACO 2. (See Exhibit 7.) The differences might help identify areas where ACOs are overlooking violations or found more effective ways to address violations.

Exhibit 7. Total Citations by Officer, May 1, 2016 to March 31, 2017

Animal Control Officer	Total Citations	Percent of Total
ACO 1	109	3.0
ACO 2	214	5.9
ACO 3	241	6.6
ACO 4	260	7.1
ACO 5	276	7.5
ACO 6	305	8.3
ACO 7	368	10.1
ACO 8	396	10.8
ACO 9	454	12.4
ACO 10	480	13.1
ACO 11	554	15.1
Total	3,657	100.0%

Source: Regional Justice Information Service data and City Auditor's Office analysis.

We also found significant differences in the types of violations written by ACOs. For example, ACO 9 wrote over 200 citations for inadequate animal care, which was 100 percent or more than 8 of the other officers. Some ACOs (9, 10, and 11) wrote more than triple the number of citations for not having a dog or cat license than other ACOs. ACO 7 wrote twice the number of citations for a dog or cat not wearing a license than most ACOs but wrote almost no citations for not having a license. (See Exhibit 8.) Management should determine the reasons for some of the differences. For example, management could determine whether the ACO who is writing many more inadequate animal care citations could use a lower level of enforcement like education that would be just as effective.

Exhibit 8. Citations by Officer and Violation Type, May 1, 2016 to March 31, 2017

Animal Control Officer	Inadequate Animal Care	Dog or Cat Not Licensed	Dog or Cat Not Wearing License
ACO 1	2	20	48
ACO 2	64	1	77
ACO 3	90	24	36
ACO 4	14	30	94
ACO 5	15	30	99
ACO 6	119	84	17
ACO 7	13	3	181
ACO 8	77	93	92
ACO 9	214	126	3
ACO 10	87	112	98
ACO 11	124	196	35
Total	608	411	647

Source: Regional Justice Information Service data and City Auditor's Office analysis.

In order to help identify patterns in citations that may require additional or different resources, policy changes, and/or training, the director of neighborhoods and housing services should analyze animal code citations by violation and animal control officer.

Training Covers Most Recommended Topics but Consistent Annual Training Needed

New officer training and on-going training received by AHPS officers and supervisors covers most recommended topics, but management should ensure staff receives annual training. AHPS's training for newly hired animal control officers covers administrative and operational functions, but does not cover an officer code of conduct. The National Animal Care and Control Association (NACA) guidelines recommend that animal care and control personnel receive comprehensive training in all aspects of their duties. A comprehensive and standardized training certification program should be developed for all personnel that includes basic and advanced skills. The training should, at a minimum, include an officer code of conduct and administrative and operational functions.[30]

[30] Personnel Training and Safety – Training Certification and Minimum Training Requirements, NACA Guidelines, National Animal Care and Control Association, p. 57.

AHPS provides new officers with a 14-week in house training where AHPS supervisors introduce new hires to city ordinances, division policies, and administrative and operational functions. In addition to the in-house training, five of the most recently hired officers completed a weeklong basic animal control officer certification course from a professional animal control training organization. KC Pet Project staff train new officers on animal handling. New officers also receive on-the-job training from current animal control officers.

We did not evaluate the quality of new hire training. Some current officers stated that the new hire training they completed was inadequate. They stated management was unprepared for their arrival and the training involved too much unstructured time that management planned for them to study ordinances without enough experience to understand what they would be doing and how the ordinances were important.

Current AHPS staff had training in many of NACA's recommended topics. To determine whether animal control officers are receiving training in the recommended topics we reviewed contents of training courses received by ACOs since 2010 and compared those to NACA's topics. We were able to verify most of the trainings by reviewing certificates of completion or sign-in sheets, but we gave some credit for training received based on management's assertion and documentation that the class was scheduled. All staff included in our review received training in animal behavior and handling and animal cruelty-neglect investigations, while most have received wildlife, officer safety, defensive driving training as well as training on how to use certain equipment, such as pepper spray or a bite stick safely. AHPS staff have not attended recommended training on some wellness and safety topics such as back safety and first aid. (See Exhibit 9.)

Exhibit 9. Recommended Training AHPS Staff Attended,[31] January 1, 2010 to February 2, 2017.

Training Topics Recommended By NACA	Percent Trained
Animal Behavior	100.0
Animal Handling Restraint	100.0
Cruelty Investigations	100.0
Officer Safety	95.2
Pepper Spray	95.2
Wildlife	90.5
Defensive Driving	85.7
Self Defense	85.7
Bite Stick	81.0
Chemical Immobilization	81.0
Personnel Protective Equipment	81.0
Zoonotic	81.0
Hazardous Materials	66.7
Scene Assessment	66.7
Nuisance Livestock	61.9
Tactical Operations Search Warrants, Hoarding Cases	57.1
Verbal Judo	47.6
CPR	38.1
Stress Management	38.1
Compassion Fatigue	33.3
Confined Space	33.3
Disaster Response	28.6
First Aid Animals	28.6
Vehicle & Equipment Maintenance, Safety	28.6
Micro Chip Scanner	28.6
AED	19.0
Distracted Driving	4.8
Back Safety	0.0
Ergonomics	0.0
First Aid Humans	0.0
Radio Usage	0.0

Source: Staff training certificates, sign-in sheets, and AHPS division manager.

Since 2014, most AHPS officers and supervisors received at least one 16 to 40 hour training class specific to animal care and control. Although staff received training specific to their core job duties in the last three years, some did not receive training each year in those core areas other than a safety related class. NACA guidelines state that animal care and control personnel should be provided both refresher courses and new and/or advanced topics regularly. Although it does not state required amounts of regular training, NACA believes

[31] The training analysis included animal control officers, supervisors, assistant division manager, and division manager that were employed with the division in January 2017.

that animal care and control professionals who pursue continuing education credits on a regular basis are more aware and better educated when it comes to utilizing current practices within the field. Providing annual training to AHPS staff would assist the division to reinforce policies and good work habits, provide opportunities to keep skills and knowledge current, and should improve job satisfaction.

When asked if there were ongoing or recurrent trainings to reinforce prior training, the division manager said he would like to meet with staff once a month for training or to go over new procedures but he is not consistent in doing this. He said it is difficult to get staff there without paying overtime and their response times are tied to responding to complaints.

AHPS staff we spoke to are unsatisfied with the amount of training they receive, although they believe it improved in the last few years after AHPS received complaints about officer performance.

To ensure AHPS animal control officers and supervisors have the skills necessary to perform their jobs using current practices, the director of neighborhoods and housing services should ensure ACOs and supervisors receive annual training consistent with their job duties.

Recommendations

1. The director of neighborhoods and housing services should require regular meetings between Animal Health and Public Safety and KC Pet Project leadership, facilitated by an outside party skilled in meeting facilitation and conflict resolution, to discuss key initiatives, resolve conflicts, and identify potential areas of collaboration.

2. The director of neighborhoods and housing services should establish a process for stakeholders to develop the city's vision for animal care and control.

3. The director of neighborhoods and housing services should ensure that owners of dogs declared potentially dangerous and dangerous have complied with city code.

4. The director of neighborhoods and housing services should ensure dogs that have bitten a human are quarantined as required by city code.

5. The director of neighborhoods and housing services should require follow-up on cruelty-neglect complaints when the animal has not been observed.

6. The director of neighborhoods and housing services should ensure cruelty-neglect violations are resolved before returning impounded animals to their owners.

7. The director of neighborhoods and housing services should ensure cruelty-neglect violations have been resolved when the animal is not impounded.

8. The director of neighborhoods and housing services should ensure Animal Health and Public Safety policies and procedures contain all documentation requirements for each case type.

9. The director of neighborhoods and housing services should ensure that supervisors regularly conduct field reviews of the animal control officers assigned to them and regularly review the officers' case documentation.

10. The director of neighborhoods and housing services should ensure that all Animal Health and Public Safety staff reads and signs a code of conduct and is held accountable for that conduct.

11. The director of neighborhoods and housing services should ensure the Animal Health and Public Safety Division tracks response times to a call for service by each response time component.

12. The director of neighborhoods and housing services should work with the Police Department so that phone calls answered after hours by the Police Department are categorized with the same call types used for animal service calls received by 311.

13. The director of neighborhoods and housing services should analyze the completeness of dispatch data received from the Police Department before relying on it for data analysis.

14. The director of neighborhoods and housing services should work with the Police Department to ensure the calculation of response time from dispatch to arrival does not include calls without an arrival time.

15. The director of neighborhoods and housing services should analyze average calls for service data to help determine appropriate staff scheduling.

16. The director of neighborhoods and housing services should analyze animal code citations by violation and animal control officer.

17. The director of neighborhoods and housing services should ensure animal control officers and supervisors receive annual training consistent with their job duties.

Appendix A

Director of Neighborhoods and Housing Services' Response

CITY OF FOUNTAINS
HEART OF THE NATION
KANSAS CITY
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Neighborhoods and Housing Services Department

Office of Director

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RECEIVED
AUG 25 2017
CITY AUDITOR'S OFFICE

Date: August 25, 2017

To: Douglas Jones, City Auditor

From: John A. Wood, Director
Neighborhoods and Housing Services

Subject: Response to Performance Audit: *Animal Health and Safety: Community Vision and Improved Management Oversight Needed*

1. ***The director of neighborhoods and housing services should require regular meetings between Animal Health and Public Safety and KC Pet Project leadership, facilitated by an outside party skilled in meeting facilitation and conflict resolution, to discuss key initiatives, resolve conflicts, and identify potential areas of collaboration.***

Agree.

The neighborhoods and housing services department currently has a contract with "Center for Conflict Resolution". The director will expand their scope of services to include conducting quarterly meetings with Animal Health and Public Safety and KC Pet Project leadership to discuss key initiatives, resolve conflict, and identify potential areas of collaboration.

2. ***The director of neighborhoods and housing services should establish a process for stakeholders to develop the city's vision for animal care and control.***

Agree.

The director of neighborhoods and housing services will establish a process for stakeholders to develop the city's vision for animal care and control. In addition, residents from zip codes with the highest levels of AH&PS service calls will be invited to participate.

3. ***The director of neighborhoods and housing services should ensure that owners of dogs declared potentially dangerous and dangerous have complied with city code.***

Agree.

The director of neighborhoods and housing services will ensure compliance is met in the following manner. Dogs that have been declared potentially dangerous or dangerous will have to be kept at the Kansas City animal shelter until the owner complies with the city code.

4. ***The director of neighborhoods and housing services should ensure dogs that have bitten a human are quarantined as required by city code.***

Agree.

The director of neighborhoods and housing services will ensure dogs that have bitten a human are quarantined as required by city code. However, we also recognize that there are pet owners who do not want their animals quarantined and refuse to cooperate and hide their animals from staff etc. In these cases, staff have been making two to three inspections and proceed with daily citations to force compliance as recommended by our prosecutor. The law mandates a 10 day quarantine period. We will continue to issue citations for failure to quarantine to force compliance.

5. ***The director of neighborhoods and housing services should require follow-up on cruelty-neglect complaints when the animal has not been observed.***

Agree.

The director of neighborhoods and housing services will require follow-up on cruelty-neglect complaints when the animal has not been observed. Animal Control Officers will be required to leave a door hanger if animal was not observed during the initial investigation and follow-up within 24hours.

6. ***The director of neighborhoods and housing services should ensure cruelty-neglect violations are resolved before returning impounded animals to their owners.***

Agree.

The director of neighborhoods and housing services will ensure cruelty-neglect violations are resolved before returning impounded animals to their owners by working cooperatively with KC Pet Project (KCPP) staff to ensure that no animal is released to owner before violation(s) are abated. Animal Health and Public Safety (AH&PS) staff will continue to provide inspection forms to pet owners at time of investigation identifying violations to be corrected before animal is released to owner and conduct a re-inspection when notified by the pet owner that the identified violation(s) have been abated. AH&PS staff will continue to enter notes in the PetPoint computer system to alert KCPP staff that the violation(s) observed on the property have been abated and the animal should be released to the owner. AH&PS staff also recognize

that not all pet owners will reclaim their animals that have been impounded or notify them to conduct a follow-up inspection but rather go to the shelter to attempt to reclaim their animal. KCPP staff will be notified that animals impounded for cruelty-neglect should never be released if notes are not entered in PetPoint stating that a re-inspection has been conducted, violations abated, animal to be released to the owner etc. Additionally, staff will update AH&PS Procedure #G-27, Procedures for Communicating Case Information between Animal Health & Public Safety and KC Pet Project to reflect this change.

7. ***The director of neighborhoods and housing services should ensure cruelty-neglect violations have been resolved when the animal is not impounded.***

Agree.

The director of neighborhoods and housing services will ensure cruelty-neglect violations have been resolved when the animal is not impounded. Animal Control Officers will work with the pet owner to correct the violation(s) and conduct follow-up inspections when required. Animal Health and Public Safety staffs recognize that "best practice" calls for working with owners to correct violations in the field vs rescue. Arguably, one of the toughest judgement calls an officer makes on a daily basis is the decision on how and when to work with the owner in the field vs impound. From speaking with experts in the animal control field, there is honestly no unified agreement on where this line is drawn.

8. ***The director of neighborhoods and housing services should ensure Animal Health and Public Safety policies and procedures contain all documentation requirements for each case type.***

Agree.

The director of neighborhoods and housing services will ensure Animal Health and Public Safety policies and procedures contain all documentation requirements for each case type by updating the division's policies relating to case types with documentation requirements.

9. ***The director of neighborhoods and housing services should ensure that supervisors regularly conduct field reviews of the animal control officers assigned to them and regularly review the officers' case documentation.***

Agree.

The director of neighborhoods and housing services will ensure Animal Health and Public Safety supervisors conduct field reviews of the animal control officers assigned to them and regularly review the officers' case documentation by requiring that all field supervisors spend adequate time in the field with their assigned team members to make sure procedures are followed.

Then come back to the office to review the officer's report. The supervisors are currently responsible for reviewing and entering their assigned team members' investigation reports into the animal control server. They will continue to do so and continue to review case documentations in PetPoint relating to stray animal investigations. FY16/17, management reviewed two thousand four hundred and seventy eight (2,478) investigation reports as well as three hundred and fifty six (356) bite investigation reports. As of August 20, 2017, management has reviewed one thousand four hundred and eighty two (1,482) investigation reports as well as two hundred and seventy one (271) bite investigation reports.

10. The director of neighborhoods and housing services should ensure that all Animal Health and Public Safety staff reads and signs a code of conduct and is held accountable for that conduct.

Agree.

The director of neighborhoods and housing services department will ensure that all current and new staff reads and understands the National Animal Control Association (NACA) code of conduct. While staff has taken the city's mandated ethics training, attended customer service training and have trained under the AH&PS Professional Demeanor procedure #CS-1, not all have received NACA training because the Association reduced local trainings, which require additional resources. However, the department will modify training on NACA code of conduct by hosting sessions internally and will require all staff to attend and acknowledge comprehension of the code's requirements and expectations.

11. The director of neighborhoods and housing services should ensure the Animal Health and Public Safety Division tracks response times to a call for service by each response time component.

Agree.

The director of neighborhoods and housing services will ensure the Animal Health and Public Safety division tracks response times to a call for service by each response time component by working cooperatively with KCPD and the City Manager's staff to achieve this goal. Response times such as "dispatch to arrival" and "call dispatch to close" were tracked under the old KCPD computer automated dispatch system (CAD) but was unable to track "call received to dispatch". The new KCPD CAD system has ability to track "call received to dispatch" which we intend to do.

12. The director of neighborhoods and housing services should work with the Police Department so that phone calls answered after hours by the Police Department are categorized with the same call types used for animal service calls received by 311.

Agree

The director of neighborhoods and housing services is working with Police Department as well as staff from the City Manager's office that would be assisting AH&PS staff in creating reports from the data received from the new Police CAD system to ensure that phone calls answered after hours by the Police Department are categorized with the same call types used for animal service calls received by 311.

13. The director of neighborhoods and housing services should analyze the completeness of dispatch data received from the Police Department before relying on it for data analysis.

Agree.

The director of neighborhoods and housing services is working cooperatively with staff from the City Manager's office to analyze the completeness of dispatch data received from the Police Department before relying on it for data analysis.

14. The director of neighborhoods and housing services should work with the Police Department to ensure the calculation of response time from dispatch to arrival does not include calls without an arrival time.

Agree.

The director of neighborhoods and housing services is working cooperatively with staff from the City Manager's office to ensure the calculation of response time from dispatch to arrival does not include calls without an arrival time.

15. The director of neighborhoods and housing services should analyze average calls for service data to help determine appropriate staff scheduling.

Agree in Part.

The director of neighborhoods and housing services understands the need to analyze average calls for service data to help determine appropriate staff scheduling. Animal Health and Public Safety division (AH&PS) has seventeen full time Animal Control Officer Positions but currently have ten officers handling field operation.

Within the last year, they have had a thirty five percent (35%) turnover rate. They are in a perpetual mode of recruiting, interviewing, screening, hiring and training. This is a very costly endeavor for any organization and greatly impedes progress. Management has been in contact with the City Manager's office to work collaboratively on staffing level needs.

16. The director of neighborhoods and housing services should analyze animal code citations by violation and animal control officer.

Agree

The director of neighborhoods and housing services will analyze citations, review policy and modify as appropriate.

17. The director of neighborhoods and housing services should ensure animal control officers and supervisors receive annual training consistent with their job duties.

Agree.

The director of neighborhoods and housing services will ensure officers and supervisors receive annual training consistent with their job duties as funding allows. All officers and supervisors have currently received professional training and will continue to do so through National Animal Control and Care (NACA), National Animal Cruelty Investigations School (LETI) or Animal Control Training Services (ACTS). Since 2013, the department has expended Twenty Six Thousand Five Hundred and Sixty Eight dollars ($26,568) for staff training. Fifty one percent (51%) of the funding was through the Justice Assistance Grant (JAG).

cc: Troy M. Schulte, City Manager
Deletta Dean, Deputy Director, Neighborhoods and Housing Services
Patrick Egberuare, Manager, Animal Health and Public Safety