

# **Miami-Dade County**

## **Office of the Inspector General**



## **Final Report**

### **Appendix B**

#### **Animal Services Department's Supplemental Materials**

*This response has been redacted by the OIG in accordance with §§281.301 and 119.071(3)(a), Fla. Stat., which make security system information confidential.*

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**OIG Review of the Animal Services Department's Shelter Operations**

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**IG14-39  
June 26, 2017**

## A. Security and Safety of Animals

The OIG evaluated kennel security due to allegations that animals frequently "escaped" and are "missing" at Medley shelter (OIG pg. 10)

Comparative Analysis does not support observation and related observations

Lost/Escaped/Missing Pets Comparison			
Agency	2015 Annual Lost/Escaped/Missing	2015 Annual Dog & Cat Intake	Lost/Escaped/Missing as Percentage (from highest occurrence to least)
1. Clay County	35	2,830	0.0123
2. Putnam County	10	1,453	0.0068
3. Collier County	15	4,440	0.0033
4. Citrus County *	14	4,352	0.0032
5. ASD	50**	29,095***	0.0017

\*Fiscal Year 2014-15

\*\*Data Reflected in OIG Tables 2a and 2b

\*\*\*Data Reflected in OIG Table 1

- Missing/escaped/lost in care is a data point/occurrence in sheltering
- Asilomar tracks missing and escaped
- ASD much smaller percentage than other shelters with smaller populations
- Transparency Act includes this data point
- Failure to evaluate ASD data in context (i.e. 28 escaped/ 22 missing out of 29,095) and failure to recognize this activity as an occurrence in animal sheltering demonstrates that all findings related to "frequently missing" not supported

Not consistently tracking and inputting into Chameleon (OIG pg. 11)

**Processes, training, and procedures exist as demonstrated by:**

- Shelter Standards
- Best Practices
- Existing Procedures
- Clarification of Supporting Materials
- Reliance on Baseless Allegations Provided to the OIG

**Animals are consistently tracked and reconciled in Chameleon (ASD)**

1. Kennel History Report demonstrates consistent tracking of animal movement
2. Kennel Inventory Reports demonstrate:
  - Written process
  - Twice daily reconciliation (provided in Department Response - Exhibit 2)
    - In the statement that "...ASD should be ensuring that any inventory with a missing animal is updated and reconciled by the end of the day", the OIG presumes incorrectly that ASD does not reconcile by end of day
  - Department-wide knowledge of process reflective of training
3. Kennel Staff meeting minutes demonstrate training and procedures (provided in Department Response - Exhibit 5)

**Written policy and process does exist for tracking animals (ASD)**

4. Inventory SOP (aka Canine Sanitation) includes written process (provided in Department Response - Exhibit 2)
5. Duties and Checklist sheets include written process (provided in Department Response - Exhibit 3)
6. The OIG report calls for written procedures and reaches the conclusion that failure to update kennel changes results in missing animals,

however, as shown by ASD written procedures this is an inaccurate observation and finding

7. The comparative data also does not support OIG observation as ASD actually has a very low occurrence of missing animals
8. The OIG states that ASD does not reconcile missing animals at the end of the year in calculating save rate. ASD reconciles daily and figures are tabulated at the end of the year and continually
9. The OIG also states that no documentation of missing animals is done. The documentation is completed daily and is documented in each animal record and a report can be generated when/if needed

[REDACTED]

Procedures and practices are in place as demonstrated by:

- Expert Input
- Reliance on Baseless Allegations Provided to the OIG
- Existing Procedures
- Best Practices

[REDACTED]

10.Guidelines for Animal Care regarding latches

11.Kennel manufacturer expert input

[REDACTED]

12.None of case examples 1-5 can be attributed to [REDACTED]

- Anastasha - *inconclusive as to reason as admitted by the OIG*
- Paco - *during cleaning*
- Kong/Gucci "loose dog" - *false allegation – [REDACTED]*
- Freddy/Samson - *during cleaning*
- Luna/Clay - *latch issue and during cleaning*

13.Dogs escaped at old facility due to old infrastructure, climbing, foul play (loose dog during visit)

[REDACTED]


16.OIG observation in OIG exhibit 3 occurred during move-in period when this item, already known to ASD, was being addressed

**OIG Exhibits do not clearly support findings (ASD)**

17.OIG Exhibit 1 – demonstrates interior non-public area and cleaning

18.OIG Exhibit 2 – inconclusive as to date, time and reason of occurrence.

Taken in restricted area by unauthorized person

19.OIG Exhibit 3 – Transition move in period. Cages are appropriately secured per industry standards with latch and as further supported by manufacturer. 

ASD does not have a report or log to track [pet] injuries or conduct reviews after incidents (OIG pg. 13)

**Process, procedures, logs and reports for tracking and reviewing injuries exist. ASD applies and documents preventative measures to avoid incidents as demonstrated by:**

- Best Practices and Standards
- Existing Procedures
- Expert Input
- Clarification of Supporting Materials
- Reliance on Baseless Allegations Provided to the OIG

**ASD consistently tracks shelter pet injuries, identifies behavior concerns to prevent incidents and has multiple logs/reports to track injuries contrary to the OIG Draft Report (ASD)**

20. Vet Checklist – used by technicians and kennel attendants to log shelter pet injuries occurring inside the shelter for veterinarians to review daily
21. Daily Rounds - serve to track injuries occurring inside the shelter continually
22. Medical History screen - captures notations used to make animal management decisions such as relocation for behavior and is used to review injuries occurring inside the shelter (provided in Department Response - Exhibit 7)
23. Requirement to identify medical issues included in Canine Sanitation SOP
24. OIG Comment - “ASD staff acknowledged that they have no tracking system in place...” is concerning as noted by the four (4) examples above
25. ASD also evaluates animals in shelter as follows:
  - Treatment Veterinarian
  - Rounds Veterinarian
  - Animal Care Specialists
  - Veterinary Technicians

## Miscellaneous Observations

All animal records should include photo, aggressive animals should be photographed through cage (OIG pg. 15)

26. This observation is not a best practice

- Photography SOP
- Notes “unable to photograph”
- Best interest
- Paco absence of picture (behavior, fearful, anti-anxiety)

## Breed Identification - Kong (OIG pg. 62)

27. Accurate identification of mixed breed dogs is unreliable

- UF article on breed identification supports ASD’s position (provided in Department Response – Exhibit 6)

## OIG case examples

Case example 1 - Anastasha

- Dog fighting allegation incongruent with internet video
- Lucky – unknown cause of being loose
- Information provided concern – witness not interviewed
- No other review conducted is not accurate
  - “ok to ER”
  - “last night he escaped from his kennel”
- Case example 1 inconclusive as to all related findings – maybe the cause was kennel infrastructure or foul play?



### Case example 2 – Paco

- Escaped during morning cleaning
- [REDACTED]
- No picture due to condition
  - Please note condition on OIG draft report page 59 – FERAL
- Cleaning procedure protocols

### Case example 3 – Kong/Gucci

- False allegation
- Self-reported and investigated by MDPD
- OIG observation notes open issue due to discrepancy
  - Brown and white versus tan and white
- For purposes of providing a clearer description of Bulldog versus Pointer
- Confusion regarding breed is not supported factually
- This case example is perpetuating inaccurate claims and ignores ASD's swift and immediate actions

### Case example 4 – Freddy/Samson

- The OIG's observations are not supported by guidelines for separating fighting dogs. Review of the video by a pet professional provides additional insight of the incident

### Case example 5 – Luna/Clay

- Person was not alone as the OIG states was the "appearance"
- C and D were connected rooms
- Kennel latch issue
- Luna/Clay also demonstrated appropriate separation procedures by employee

## Summary for Security and Safety of Animals

The OIG states the incidents reported result from:

### Lack of Physical Inventory Procedures

- ASD has demonstrated that numerous procedures are in place and that the basis for this observation is substantially flawed

### Inadequate Documentation

- ASD has demonstrated proactive documentation of pet behavior, documents incidents regularly and uses the information to make subsequent pet management decisions

Insufficient Training regarding animal fights - the OIG noted three (3) animal fights in its report

1. The inconclusive case of Anastasha where no staff are present
2. The case of Freddy and Samson in which the OIG's observations failed to acknowledge correct industry practices and demonstrated incorrect dog behavior observations
3. The case of Luna and Clay where an employee only working one week is assisted by an employee who immediately separated the animals. The OIG makes no observations as to the difficulty of disengaging dogs in a fight

The OIG relies on case examples 1-5 to support observations, however, as demonstrated:

- Case example 1 is inconclusive regarding all of the findings
- Case example 2 is an escaped dog and is not related to fighting or training. The lack of a picture is consistent with best practices and department SOP for fearful/aggressive dogs
- Case example 3 is a baseless allegation and was immediately addressed. In addition, it does not involve a dog fight and, again, is consistent with best practices in photography of animals and department SOP for fearful/aggressive dogs

- Case example 4 demonstrates use of industry recommendations for breaking up a dog fight and did not have to do with unlocked/unlatched kennel
- Case example 5 showed that an employee immediately separated dogs

## B. Animal Welfare

The OIG found that there was no adequate mechanism for tracking animal exercise (OIG pg. 17)

Procedures, policy and practice are in place as demonstrated by:

- Expert Input
- Best Practices

**To track animal walking, ASD is utilizing the whiteboard method (ASD)**

28. Animals are walked and participate in playgroups daily

29. There is no definition of wholesome exercise and this will be further researched

30. Fifteen minutes per day and CAO position

31. Written procedures are in place in walking SOP



The OIG states that incidents (skin irritations) occurred when cleaning procedures were not sufficiently followed (OIG pg. 19)

**Practice in place does not support this observation as demonstrated by:**

- Reliance on Baseless Allegations Provided to the OIG
- Expert Input

**The incidents could not be concluded as occurring from cleaning procedures but, instead was suspected to be a result of the facility infrastructure at the Medley facility (ASD)**

- 32.As provided to the OIG in ASD’s response, the issue resulted from porous flooring
- 33.ASD consulted with multiple industry experts on the use of all cleaning solutions prior to their use
- 34.The characterization of a significant cutback is inaccurate as there were minor occurrences and after the changes there were no further noticeable concerns

### Summary for Animal Welfare

- ASD has written procedures for dog exercise and will detail the requirements further as recommended
- The issues with skin irritations were addressed immediately, not concluded to be the result of cleaning procedures and resulted from baseless allegations

## C. Save Rate

### Asilomar Accords Methodology

- In 2004, “Animal Welfare Leaders” gathered in California
- “Save the lives of healthy, treatable... animals”
- Parties to the Accords
- Update on Results

Formulas	
	2015 Calendar Year
OIG recommended Rate (Asilomar)	91.23
ASD Save Rate (Outcome)	90.03

ASD supports using the Accords methodology

In reporting save rate, ASD only reports percentages... practice is contrary to the Accords (OIG pg. 22)

Policy and procedures for Accords were never adopted by ASD and instead another save rate policy was pursued as demonstrated by:

- Expert Input
- Best Practices
- Clarification of Supporting Materials

#### ASD is not a party to the Accords (ASD)

35. ASD complies with Shelter Transparency Act

36. OIG states only percentages reported, however, ASD documents show otherwise

37. Board adopted “no kill” program not “asilomar program” which conflicts with no kill “guiding principles”

38. Disclaimer statement used since mid-2015

39. “While the increases seem laudable...”

Euthanized Pets						
	2010	2011	2012	2013	2014	2015
Euthanized	18,886	13,756	11,153	6,888	5,140	2,521

The OIG indicates there are "...numerous data entry errors and instances where figures were not clearly identified" (OIG pg. 23)

**Policies, procedures and practices refute findings as demonstrated by:**

- Shelter Standards and Best Practices
- Existing Procedures
- Clarification of Supporting Materials

**ASD terminology is consistent contrary to OIG Draft Report (ASD)**

40. ASD correctly reports and identifies save rate – as demonstrated at June 12, 2012 PSHAC meeting contrary to OIG interpretation of supporting materials
41. All other reference to this data by the OIG are inaccurate as it was correctly reported repeatedly
42. Terminology varies from shelter to shelter (ASD Exhibit 9 – Tallahassee)
43. ASD use of “transfers” and “transports” purposely recognizes rescue-related programs distinctly for measuring and performance purposes
44. “Animals impounded” are only referred to by ASD as Intake (i.e. shelter intake) for data purposes, in line with shelter standards. “Pets handled” is a term used in describing intake in layman’s terms for narrative purposes in Business Plans
45. Presentation in Texas including foster information does not affect or undermine validity of data or save rate, yet, the report references this as a data entry error
46. Reporting of the save rate is accurate and consistent with industry terminology and consistent from year-to-year
47. Data for reporting is derived from the same source. Business plans used fiscal year data and categories for budget purposes



Inaccuracies result from limitations in Chameleon and inconsistencies... can result when gathering data (OIG pgs. 23-24)

**Procedures protect from inaccurate calculations as supported by:**

- Existing Procedures Incorrectly Referenced
- Clarification of Supporting Materials
- Expert Input

**ASD agrees with the limitation issues, however (as recognized by the OIG), Chameleon is designed to capture data in separate screens depending on activity and/or service provided (ASD)**

48. Case example 8 (OIG pgs. 71-73) demonstrates no error in data captured for save rate calculations or intake statistics

- SOP in place for correct procedure
- Information is extracted from various fields – but not for save rate calculations
- This is an oversight of not updating a field in a record

49. Due to the limitations of Chameleon certain records cannot be corrected, however, the case examples do not support the OIG's observations regarding errors diminishing the reliability of data

- Case example 8 – Nala
- Case example 9 – 60 cats
- Case example 10 – Boofy (Chameleon note)
- Case example 11 – Orange Tabby
- Case example 12 – Did not affect save rate

The OIG identifies "...returned to owner on the same date as an entry of euthanized" as inconsistent or conflicting/affecting the accuracy of data (OIG pg. 24)

**Policies and procedures show these are correct entries as demonstrated by:**

- Shelter Industry Standards
- Clarification of Supporting Materials
- Reliance on Baseless Allegations Provided to the OIG

**Returned to owner on the same date as euthanized is not "inaccurate" or "conflicting" (ASD)**

50. The outcomes of RTO are accurate – the owner was reunited with his pets at the shelter
51. It is a constituent's right to have their pets returned and consistent with owner requested euthanasia policy and best practices
52. ASD is concerned that the OIG received baseless allegations regarding this case

The OIG identifies “...an entry of active in the kennel after an entry of euthanized” as undermining the integrity of the data (OIG pg. 25)

Policies and procedures show these are correct entries as demonstrated by:

- Clarification of Supporting Materials
- Shelter Standards and Best Practices

Data is not undermined because the fields identified by the OIG as pets being euthanized are not associated or used for determining outcome or collecting save rates (ASD)

53.The OIG repeatedly refers to the incorrect screens to identify the actual outcome – i.e. “an entry of adopted after an entry of euthanized” is not an accurate representation of the activity (Tag/Link screens do not affect save rate calculations)

KENNEL SCREEN: This screen is used for save rate calculations and was correctly captured here.

The screenshot shows a software interface for kennel management. The 'Outcome Information' section is circled in red, showing an adoption record.

Type	Subtype	Cond	Date	Time	Weight	Dose	Dose2	Bottle	Bottle 2	By	Receipt No
ADOPTION	SHELTER	NORMAL	08/19/14	12:23	.00	.00	.00			YH	

54.ASD has found that the majority of the 127 records did not impact the calculation of save rate data incorrectly

The OIG states that the use of one term to record different events creates a conflict in the records and leads to unreliable data (OIG pg. 25)

**Procedures refute this point as demonstrated by:**

- Clarification of Supporting Materials
- Existing Procedures Incorrectly Referenced

**Review of records is difficult as the OIG's review does not clearly indicate what the conflicting entries are, however, "euthanized on the same day" as entries indicating denied is not a conflict (ASD)**

55.ASD cannot identify how the OIG concludes that "the void was not entered to indicate denial..." or used for some form of data entry error

56."Denial" is not a conflict with "void" as "denial" is not a term within the Chameleon database

57.Data is not made unreliable as the examples indicate both pets were correctly impounded (intake) and outcomed and correctly counted against the save rate

The OIG cites errors were created by improper use of terms to report some animal outcomes for dogs transported to a Canadian rescue and that this affects the accuracy of data (OIG pg. 25)

**Policy in place does not support this as demonstrated by:**

- Shelter Standards
- Information Provided Incorrectly Referenced

**The classification of pets are correctly reflected (ASD)**

58.The dogs were processed as adoptions

59.The individual did not present paperwork meeting the definitions for a rescue group

60.This did not affect the save rate incorrectly

61.The Canadian individual did not qualify as a rescue group as per local rules

### Miscellaneous Observations

OIG conducted an analysis of 193 records (OIG pg. 26)

62.This information was not provided to ASD

Scanning of forms is inconsistent (OIG pg. 27)

63.Scanning of forms does not affect save rate or reliability of data

- Not staffed or equipped at Medley facility
- Functioning now as noted in Department Response

## OIG case examples

### Case example 9 – 60 cats

- As demonstrated the cats were correctly outcomed in line with industry standard and practice
- The case example is conjecture, speculative and a concern regarding the information provided by the source:

*“The complainant emphasized that ASD knew that, due to the condition of the cats at intake, the cats would be euthanized, and yet the outcome affected the save rate positively.”*

- The cats were confiscated

### Case example 10 – Boofy demonstrates limitations with Chameleon

- The OIG Draft Report does not recognize the employee note that the dog was an owner requested euthanasia. The inability to correct the initial entry in Chameleon was the problem as recognized by the employee

### Case example 12 - Psycho and Tyson

- This case example is correctly identified by the OIG as an issue with striking through the euthanasia log but does not inaccurately impact the save rate

## Summary for Save Rate

ASD is appreciative that the OIG found that:

- There is no intentional skewing of data
- Parameters for capturing data to calculate save rate are correct
- ASD did not deliberately falsify or manipulate data in Chameleon

However, the OIG observations regarding transparency and data reliability are incorrectly based on the:

- Misunderstanding of industry terminology
  - ASD has clearly shown that there is no inconsistency with terms and that these items do not impact the save rate
- Do not recognize repeated and consistent reporting of the save rate in line with best practices and County policy
  - ASD supports use of Asilomar Accords, however, all conclusions drawn from references to the Accords in the OIG Draft Report are not relevant as ASD was never a party to the Accords
  - The OIG references the frustration of animal advocates, however, does not identify which issues they allegedly complained about, ASD has clarified known issues that have been falsely misrepresented by advocates
- The classification of “errors” in Tag/Link records as do not conflict with save rate data
- Use of many examples that do not affect the save rate
  - ASD has overwhelmingly demonstrated that the majority of issues identified by the OIG as errors were indeed correct and/or do not affect the save rate
- These conclusions refute the OIG observations regarding save rate inaccuracies

## D. Records Reconciliation

The OIG correctly states that ASD does not reconcile the number of animals disposed (OIG pg. 31)

**Policies, procedures and practice do not support this observation as demonstrated by:**

- Shelter Industry Practice and Standards
- Clarification of Supporting Materials
- Reliance on Baseless Allegations Provided to the OIG

**While the OIG observation is accurate, it is not a common practice in animal sheltering (ASD)**

64. These observations and recommendations originate from the baseless allegation that ASD was incinerating animals while alive
65. The practice of reconciling disposed animals was researched with shelter industry experts who indicated it would be an additional resource and deemed of little practical benefit
66. More than one small animal can be placed in the same disposal bag creating additional reconciliation concerns
67. Disposal of animals from the field are also included in disposal activity on an ad-hoc basis



The OIG indicates that in three samples, the drug dosage in Chameleon does not match the Euthanasia Log (OIG pg. 30)

**Policies and procedures in the use of Chameleon limit the ability to do this as demonstrated by:**

- Supporting Materials
- Shelter Standards

**ASD policy and Chameleon procedures do not allow for the drug dosage to be modified (ASD)**

68. As recognized by the OIG – euthanasia entries are made prior to the actual euthanasia

69. The OIG does not recognize the basis for the policy and procedure conflict

70. The recorded dosage in Chameleon is an estimate in line with the policy of recording euthanasias prior to the actual procedure

OIG case examples

Case example 8 - Nala

- This case example is reflective of an oversight to strikethrough the Euthanasia log
- This example does not affect the save rate
- Technicians receive appropriate training as part of their euthanasia certification

## Summary for Records Reconciliation

- The need to create a reconciliation report while a seemingly logical recommendation, is not a common or best practice in sheltering
- ASD does see the merit in reconciling the Euthanasia Log with Chameleon. However, this should not be represented as an oversight as it is not a common or best practice and no such requirement exists
- Record keeping requirements for controlled substances are prescribed by federal and state law; the additional recommendation to update Chameleon is not possible as demonstrated in the report
- ASD will explore additional options for “drop-down” menu in Chameleon

## E. Tracking of Animals Transferred to Rescue Agencies

The OIG noted that "The Rescue Program is a vital part of ASD's ability to save an ever increasing shelter population due to the No Kill initiative." (OIG pg.33)

**ASD live release program data shows a higher amount of pets saved through non-rescue programs and that the no kill initiative has not increased the population as demonstrated by:**

- Clarification of Supporting Materials

**Shelter Intake is actually down for dogs and dropped from more than 20,000 in 2009 to approximately 14,000 in 2015 (ASD)**

71. Adoptions were almost 9,000 in 2015 while rescues were approximately 4,500
72. The OIG Draft Report does not recognize that the shelter-driven programs and policies have been the impetus in saving the most at-risk pets
73. Rescue incentives have been used to support groups rescuing the most at-risk pets

ASD has clearly not monitored or followed up on the requirements placed on organizations to report on a monthly basis (OIG pg. 37)

**Process is in place as demonstrated by:**

- Information Provided Describing Existing Procedures

**ASD undertook changes to Rescue Program in 2014 (ASD)**

74. ASD imposed reporting or disposition that was previously not in place

75. Periodic reporting and at the request of ASD are the requirement

76. We can ask for additional interpretation

77. We agree with expanding the amount for periodic reporting

## Miscellaneous Observations

Humane Society noted that they are not in the group communications sent by ASD to rescue groups (OIG pg. 37)

78.HSGM is included in group communications

- HSGM is a rescue organization and we will change their agreement to require reporting
- Transfer History
- “Outstanding facilities”:

UF Dean, Director, Veterinarians, ASPCA, PetSmart Charities President, Former Art Museum Director

Often the rescue organizations will take sick or special needs animals... (OIG pg. 33)

79.This OIG Comment does not recognize the shelter’s work in stabilizing pets and medical treatment of animals for rescue and all live release programs; ASD is not familiar with the basis for this determination

- Chief Veterinarian’s work
- SUN Program
- Rescue cherry picking
- Rescue attacks

OIG recommends a possible avenue for an agreement with Canadian group using Section 5-5(d) of the County Code (OIG pg. 34)

80.ASD agrees with the OIG and recognizes that the approach of using adoption contracts to save these animal was also an applicable approach within ASD’s resources

- Agreements do exist – adoption agreements
- “Rescue partners” is what they call themselves
- Affect save rate the same

## Summary for Tracking of Animals Transferred to Rescue Agencies

- The OIG's observations regarding an "ever-increasing shelter population" are inaccurate and form the basis for editorial content that should be eliminated
- The observations regarding the Canadian rescue, while completely logical, are not incorrect or cause inaccuracies as stated in the OIG Draft Report
- The standard for checking on the disposition of animals is periodic and as requested by ASD. The Department made these legislative changes to address historical practices and ensure that the checks are done – we agree to expand these checks, but note they are in line with the CAO's opinion
- ASD provided information addressing anecdotal and editorial comments regarding other organizations. ASD also provided comments from reputable industry leaders about the Doral facility. The editorialized comments should be eliminated; industry-leading, exceptional work by ASD should be recognized

## F. Security of Facilities and Controlled Substances

[REDACTED]

[REDACTED]

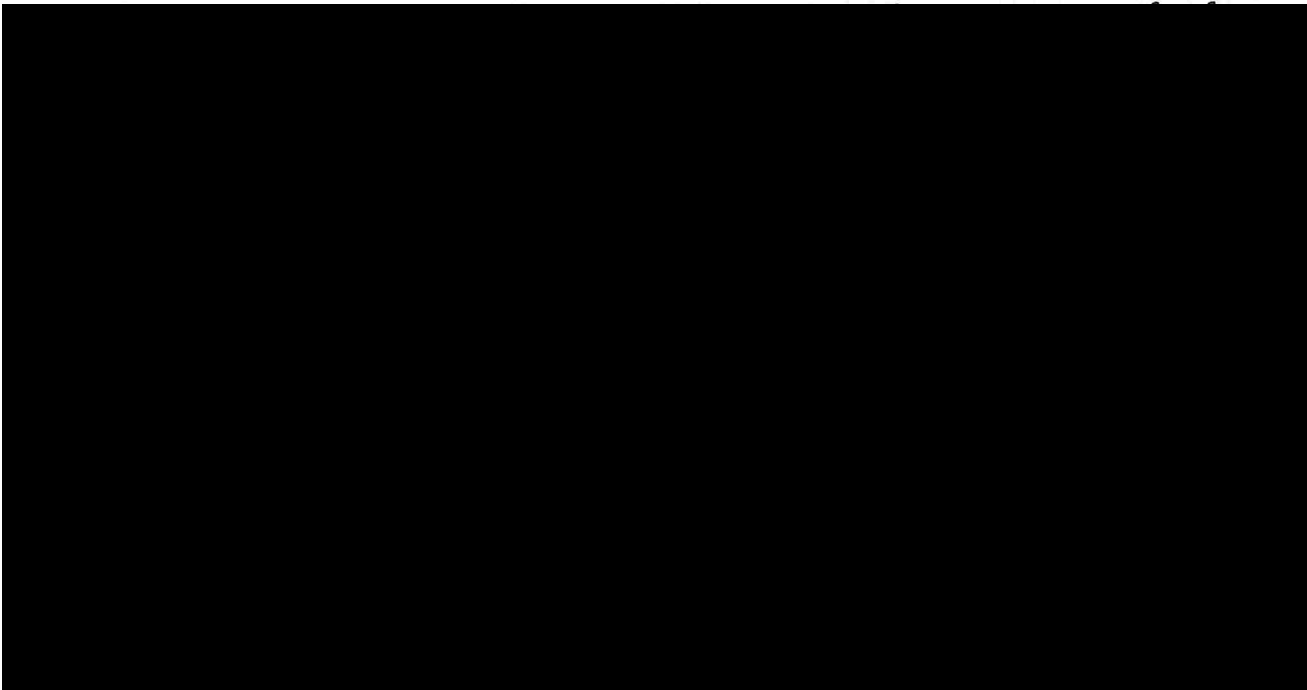
[REDACTED]

[REDACTED]

The OIG states that the door to the Diagnostic Room does not have a lock or other locking mechanism (OIG pg. 38)

Procedures in place for safety and security of people and pets as demonstrated by:

- Shelter Standards
- Expert Input





The OIG noted the lack of segregation of pharmacy duties and not performing inventory demand analysis at the Medley facility and that this continues at the new facility (OIG pg. 39)

**Procedures, policy and practice in place as demonstrated by:**

- Clarification of Supporting Materials

**The segregation of pharmacy duties was recognized by ASD as an issue at Medley and corrected prior to moving to the new facility.**

86. The hiring of additional personnel to include two (2) Inventory Clerks fully addressed the OIG's observations regarding the segregation of pharmacy duties

87. Drug logs are being kept as noted by the OIG

## Summary for Security of Facilities and Controlled Substances

- The pharmacy observations at the Medley facility were a function of the limitations of the old building and were clearly addressed both operationally and structurally at the Doral facility

- Physical inventories have been conducted since 2012
- The frequency of physical inventories conducted by ASD exceeds the DEA requirement

## G.ASD Staffing

The OIG notes that animals are kept offsite (Kennels/Medley) due to an ever-increasing animal population due to the No-Kill goal (OIG pg. 42)

**Policies and procedures indicate inaccuracy in OIG observations as demonstrated by:**

- Reliance on Baseless Allegations Provided to the OIG
- Clarification of Supporting Materials
- Best Practices

**As demonstrated by intake data, the population has not increased but has dropped precipitously (ASD)**

88.ASD is not familiar with the basis for this claim but is concerned about the accuracy of the source

89.The intake data on page ten (10) of the OIG Draft Report shows a decrease for all pets from 35,513 in 2009 to 29,095 in 2015

91.Enrichment is part of Medley operations and a facility check will be done to assess infrastructure issues

## Miscellaneous Observations

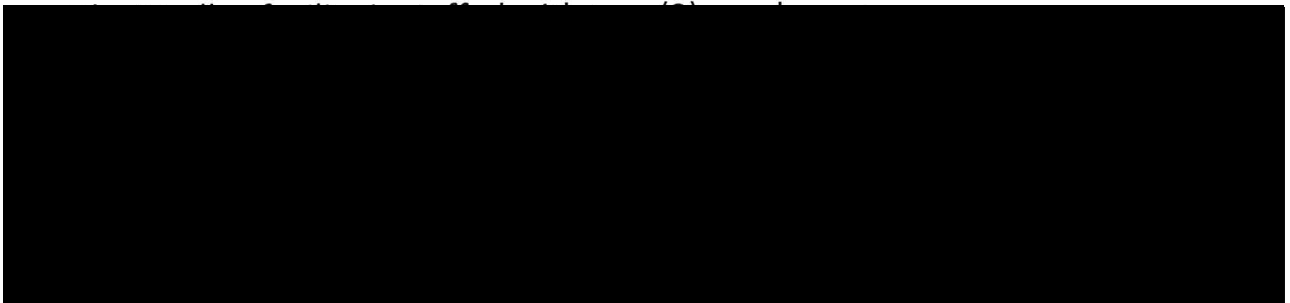
The OIG reviewed an allegation that ASD provided staff with monetary incentives for achieving certain outcomes (OIG pg. 42)

92. This was disproven, yet, remains in the OIG Draft Report

93. Incentive program was in line with grantee requirements

## Summary for ASD Staffing

- The OIG's observation regarding increasing populations is contrary to the data





## Summary Conclusion

1-While the OIG's recommendations are largely agreed to (15 out of 18) the majority of observations, findings and subjective comments have been demonstrated as inaccurate and/or not in accordance with industry standards and practice

2-The OIG cites certain thematic concerns with regard to: A. Animal Safety, C. Save Rate and D. Records Reconciliation sections in the OIG Draft Report. Each of these concerns is described in Attachment 1: *Index of ASD Responses to Observations and Findings in Sections A, C and D of OIG Draft Report*. A brief description of the information and numerical reference refuting the findings from today's Summary Presentation are included.

3-The information presented today combined with the Department's Response of January 13, 2017 merit the revision and withdrawal of the majority of the Draft Report. Findings are not logically supported by the observations, conclusions are not sufficiently supported, and there is non-pertinent subjectivity and commentary in specific observations.

<u>OIG Observation/Finding: Section C. Save Rate and D. Records Reconciliation</u>	<u>ASD Response &amp; Reference from Summary Response</u>	<u>Reference Number</u>
Inaccurate or incomplete record keeping	ASD is not a party to the Asilomar Accords	37
	The Asilomar Accords are not an industry requirement	37
	ASD has reported raw data to anyone requesting it	36
	ASD complies with Florida Shelter Transparency Act which unlike the Accords is a requirement	35
	OIG incorrectly interprets terminology and does not rely on save rate best practices	40, 42, 43, 44
	Save Rate terms consistent year-to-year	46, 59, 61
	Data for Save Rate is reliable and accurate	54, 57, 58, 59
	Lack of Documentation	Kennel screen "typos" do no affect save rate data
OIG confuses industry nomenclature, however data classification is accurate in determining outcome categories as used by ASD		50, 52, 55 57
Case examples 9, 10, 12 do not support this observation		
Lack of Reconciliation of Records	Records are reconciled real-time and recorded for record keeping and data purposes.	2, 3
	Recommended OIG reconciliation are not industry standards	64, 65, 66, 67