Investigation Report

Manatee County Public Safety Department
Animal Services Division Complaint

March 31, 2016
Investigation No. 21520100
MEMORANDUM

TO: Ed Hunzeker, County Administrator
FROM: Angelina “Angel” Colonneso, Clerk of the Circuit Court & Comptroller
DATE: March 31, 2016
RE: Investigation Report – Manatee County Animal Services Complaint

Per your request, the Internal Audit Department has completed an investigative review of allegations made by a former Animal Services Division employee regarding the Division’s operations. Attached is the final report summarizing the results of our investigation.

If you have any questions regarding this report, please contact me or Lori Stephens, Director of Internal Audit, at extension 4170.

Enclosures

cc: Robert Smith, Public Safety Department Director
    Mitchell Palmer, County Attorney
    Board of County Commissioners

"Pride in Service with a Vision to the Future"
Clerk of the Circuit Court – Clerk of Board of County Commissioners – County Comptroller – Auditor and Recorder
Manatee County Clerk of the Circuit Court
Internal Audit Department

Investigation Report
Manatee County Animal Services Complaint

March 31, 2016

TABLE OF CONTENTS

Introduction .................................................................................................................................................. 1

Summary of Findings.................................................................................................................................. 1-2

Background ................................................................................................................................................. 2-3

Discussion and Findings ........................................................................................................................... 3-13

Recommendations ...................................................................................................................................... 14

Exhibits ...................................................................................................................................................... A-H
Manatee County Clerk of the Circuit Court
Internal Audit Department

Final Report
Manatee County Animal Services Complaint

Introduction

In July 2015, Manatee County became aware of a social media posting in which the former Animal Services supervisor, Beth Lewis, who had formerly served as the Division’s shelter manager, alleged:

- Animal Services employees have been stealing time from the County by falsifying hours reported on their timesheets.
- The Animal Services shelter was consistently understaffed, partly due to management intentionally holding a vacant position open until a former (retired) employee could apply.
- Intake vaccinations were not being administered properly.
- A “project” dog that Beth Lewis had been working with was targeted for euthanasia by fellow employees.

On July 20, 2015, representatives of Manatee County administration requested the assistance of the Internal Audit Department to investigate and report on these allegations. A copy of the social media posting was obtained by Internal Audit (Exhibit A), and on July 22, 2015, Beth Lewis confirmed in an interview that she had written the complaint which was posted.

Summary of Findings

The information obtained during this investigative review partially supports the allegations made by the former Animal Services supervisor, Beth Lewis (referred to as the “former shelter manager”). Based on our review of documentation and interviews with Animal Services management and staff, we conclude:

- **Work hours were incorrectly reported on timesheets for several Animal Services employees during the time period examined.** (Pages 3-8) We identified a number of instances in which the work hours reported appear to have been overstated. We found other instances where reported hours may have been overstated one day, and then conversely understated another day; however, supporting documentation for these days was inconclusive. We were also unable to determine the extent of any possible overcompensation to employees due to a lack of definitive data with which to compare; Animal Services does not utilize a time clock or other type of system to capture and record employee work time. Factors contributing to the errors included:
  - Employees failed to record leave time on their timesheets.
  - Some employees relied on supervisors to record leave time on their timesheets. Testing found that supervisors had often input or adjusted hours on employee timesheets, especially when employees did not request leave ahead of time, such as calling in sick, or leaving early. Sometimes these entries were not made, or were incorrect.
  - Supervisors did not adequately monitor employee work time, review staff timesheets, and make necessary corrections.
  - An employee was authorized to work from home with no requirement to track work hours or to accurately report the time she had worked. According to interviews, she was told to leave her 8 hours “as is” on her timesheets.
o Employees “flexed” work time and/or traded shifts with coworkers and did not update their timesheets to reflect the actual days or hours worked.
  o Animal control officers did not correctly record call outs while on standby duty.

• **The Animal Services shelter appears to have been understaffed during the period Beth Lewis was employed by Animal Services, partly due to the Interim Animal Services Director holding a vacant position open for several months until a former employee was eligible to apply.** (Pages 8-10) Additional factors that also could have contributed to the shelter being understaffed included:
  o The shelter population had increased significantly.
  o A shelter employee was not able to perform shelter cleaning duties due to medical reasons, and at one point, was allowed to work from home.

• **Intake vaccinations were not always administered properly.** (Pages 11-12)
  o Vaccinations were not given to animals immediately upon entering the shelter, as industry standards recommend, and as stipulated in the Animal Services Standard Operating Procedures. Testing found that, on average, animals were being vaccinated within 36 hours of intake.
  o Protocols for administering premixed vaccines within an hour of mixing had not been strictly followed; however, at the time that this complaint was submitted to the County, the Veterinary Services staff had already addressed the issue and implemented new procedures to ensure compliance with the standards.

• **A “project” dog that the former shelter manager had been working with did not appear to have been targeted for euthanasia by fellow employees.** (Page 13) Protocols established for selecting animals for euthanasia appeared to have been followed with selecting this particular dog. Additionally, the former shelter manager, Beth Lewis, was one of the three staff members who approved that the dog be euthanized, as evidenced by her signature on the dog’s kennel/cage card. Ultimately, the dog was transferred to a local rescue organization.

**Background**

The Manatee County Animal Services Division’s mission is to maintain public health and safety through the enforcement of laws and ordinances related to animals; and to promote responsible pet ownership, promote adoptions, and reduce pet overpopulation. As part of the County’s Public Safety Department, Animal Services enforces the Manatee County Animal Ordinance (12-10) and Florida Laws relating to animals; provides an animal adoption program; picks up and shelters stray, sick, and/or injured animals; issues rabies licenses/certificates; investigates animal cruelty and neglect; and quarantines animals that have bitten someone. (Source: www.mymanatee.org)

Animal Services is currently led by the Animal Services Chief, who reports directly to the Public Safety Department Director. The Division’s operations include animal control, the animal shelter, volunteer services, and veterinary services. The Division is staffed by two Animal Services supervisors, one who oversees animal control operations, and one who oversees the shelter operations. There are two veterinary technicians, a volunteer specialist, and an administrative specialist. (Exhibit B-1) From August 2014 through September 2015, the Division was led by an Interim Animal Services Director, who was contracted through an outside employment agency, and reported to the County Administrator. In addition, there was an Interim Manager position, staffed by a County employee, who reported to the Interim Director. (Exhibit B-2)
In 2014, Matrix Consulting Group was retained by Manatee County to conduct an evaluation of the Animal Services Division. Their study included an analysis of shelter operations and staffing, as well as an assessment of best practices. The results of the study and recommendations were summarized in a report issued December 9, 2014.

**Discussion and Findings**

In an effort to determine the validity of the allegations, auditors obtained and reviewed documentation, conducted interviews with current and former Animal Services employees, performed observations, and researched industry standards and best practices. The results of our review are detailed in the following sections:

**Allegation #1 – Employees falsified timesheets.**

*Scope of testing: 12/01/2014 through 07/15/2015*

Administrative employees generally work during normal business hours (8:00 a.m. - 5:00 p.m.) Monday through Friday. Shelter staff, who are responsible for the care of the animals, work varied schedules seven days a week, including holidays. Animal Control officers are scheduled to work five days a week during business hours Monday through Saturday. Officers are also assigned standby duty, on a rotating basis, to cover emergency call outs that occur outside of normal operating hours. During the testing period, veterinary technicians (vet techs) generally worked during normal business hours Monday through Friday, but the Division has since expanded those hours to include Saturday as well.

All County positions are classified as either “exempt” or “non-exempt” from the provisions of the Fair Labor Standards Act (FLSA). This classification is determined by the County Human Resources Department, in consultation with the County Attorney’s Office. Whereas exempt employees are expected to work whatever hours are necessary to accomplish the duties and responsibilities of their positions, and are provided some latitude in their work schedules, non-exempt employees are required to truthfully and accurately record their actual hours worked each day. (Exhibits C-1, C-2) Within the Animal Services Division, only the Interim Animal Services Manager position was classified as exempt. All other Animals Services positions have been classified as non-exempt.

Currently, the County utilizes an electronic time keeping system (WorkForce) in which employees are required to input their hours worked each day and any leave time taken. Every two-week payroll period, employees submit their timesheets electronically to supervisors for approval. Supervisors are responsible for reviewing, correcting, and approving the timesheets. This timekeeping system is not a time clock, and employees and supervisors are responsible for ensuring the information reported is accurate. Due to the unique circumstances and operating environments throughout the various County departments and divisions, there is no standard within the County for how supervisors should track employee time. Our survey of other departments within the County found various methods being used including work schedules, desk calendars, electronic calendars, emails, and sign-in/sign-out sheets. We did find one County department, the Convention and Visitors Bureau, which utilizes a time clock system; however, the time clock is only used by temporary, part-time event staff, who do not access WorkForce.

In order to evaluate whether employee time was recorded correctly, we obtained timesheet reports from WorkForce for the 28 individuals who were identified as working for Animal Services during the audit period. This included 14 employees who worked in the animal shelter, 7 animal control officers,
and 7 other employees who served in various other capacities, such as vet techs, volunteer coordinator, management, and administrative support.

We identified 3,284 days in which employees recorded work hours on their timesheets during the testing period; however, we did not individually review all 3,284 timesheet entries. The Division does not use any type of mechanism or system to track employee work hours (ex. time clock), so there is no specific record of the time worked with which to compare to what was recorded in WorkForce. Employees are expected to follow the “honor system” when recording their time in WorkForce and supervisors are responsible for monitoring that time. Our examination of supporting documentation that was available found that each Animal Services supervisor utilized different methods to track employee time, and the records maintained were very limited. We used both manual and automated (ACL) data analysis techniques to evaluate the documentation and records provided, and in each instance where a discrepancy was found, we performed a detailed analysis to determine if the time entry appeared to be correct. The following support was considered in our analysis:

**Key Card Data:**
Key card door and front gate entry swipe records were evaluated to establish whether an employee had been at the work site on a particular day. Using data analytics software (ACL), all 3,284 work days recorded in WorkForce were compared to employee card swipe data for those days. Any days where an employee had no card swipes, but recorded regular work hours, were identified for further analysis. In addition, instances where employees had key card swipes, but did not record any regular hours in WorkForce, were also identified for review.

The key card data did have its limitations, as we discovered that employees could potentially enter or exit the facilities and move about without necessarily swiping their key cards during the day. We found that not every entry/exit point required a key card for access, and some work areas, such as the front counter, were not always locked or restricted. In addition, employees were also able to access restricted areas using “visitor” key cards, which would not identify the employee who accessed a particular area on a given day or time.

**Chameleon Activity Logs:**
Animal control officers are required to make an entry into the Division’s computer system, Chameleon, whenever they are dispatched on a call. Daily activity log reports, which include the details and times of the calls for each animal control officer, can be generated from the system. These logs were used in our analysis to help corroborate the hours recorded by the animal control officers.

**Computer System Log In Information:**
We obtained records of computer log in activity on the County’s Active Directory system. This data indicates the date and time an employee logged on to a County computer, which would support that the employee was physically at a work site at that time. Unfortunately, these records were not complete for the entire audit period, as the system overwrites older data as its memory fills up. When available, the records of computer activity were used to corroborate the work hours reported by employees.

The WorkForce timekeeping system also saves the date and time when an employee makes an entry into the system. This information was also used in our analysis to corroborate hours worked and to identify who made entries and/or changes to hours reported in WorkForce.
Sign-in Sheets:
During a portion of the time Beth Lewis was supervisor, she required shelter employees to sign in and out each day. We compared the entries on the available sign-in sheets to the time reported in WorkForce.

Calendars:
Some management staff used desk calendars to document when employees were off or left early. We obtained any available calendars and compared them to the time reported in WorkForce.

Emails:
Email records obtained for several Animal Services employees were used to corroborate hours worked or to identify other potential instances where time was incorrectly recorded.

Based on our analysis, we identified 380 instances of potentially irregular timekeeping entries during the testing period. Each instance was examined in detail to determine whether the hours recorded on the employees’ timesheets appeared to be correct. After further review, we found that approximately 45% (170) appeared to have been reported incorrectly. The results of our examination are as follows:

REPORTED WORK HOURS WERE OVERSTATED (27 instances)
It appears that employee work hours were incorrectly overstated on the timesheets and those employees may have been overcompensated.

- Employees reported regular hours worked (full day), but documentation supports that the employees did not work at all on those days. (10) In all of these instances, the employees did not have any key card door swipes in any Animal Services facility, nor was there activity on any County computer system, or any other support to indicate that the employee worked on that day. In addition, documentation, such as notes on calendars, sign-in sheet comments, and emails, was found to support the employee did not work that day. Examples included employees who were out sick for the day or took the day off, and included animal control officers and shelter workers.

- Employees reported regular hours worked but documentation supports that the employees worked fewer hours than were reported. (13) These instances were identified through notes on calendars, sign-in sheets, and emails, which indicated that the employees had left early or were otherwise away from work, but no deduction in hours worked or use of vacation or sick leave was reflected on the timesheets for those days. In all of these instances, we evaluated key card door swipe data and system log in activity to further corroborate that the employees had not been on the premises during those times. Employees involved included animal control officers, a shelter worker, a dispatcher, the administrative specialist, and the former shelter manager.

- Employee hours were incorrectly reported on timesheets by supervisors. (4) In these instances, the time recorded in WorkForce did not agree with supporting sign-in sheets, and a review of WorkForce logs indicated that the time had been incorrectly changed by one of the Animal Services supervisors, not the employees. All instances involved shelter worker timesheets.

The employees involved in the above instances, who are still employed with Manatee County, were interviewed regarding the above findings, and none denied that their time may have been incorrectly reported. Many cited a lack of training on how to enter time off in the WorkForce system and stated that they relied on management to record their leave for them. Typically time off should be requested
through the WorkForce system by the employee submitting a leave request either before the time off occurs, or after, in the case of unscheduled sick leave. Upon supervisor approval, the leave automatically posts to the employee’s timesheet. If the leave is not requested through WorkForce, employees still have the ability to correctly report work hours and leave time on timesheets when they are submitted to supervisors for approval.

We reviewed vacation and sick leave reported during the period 1/1/13 through 2/12/16 for the employees interviewed and found that 50% of the time when leave was recorded, it was entered directly into WorkForce by supervisors, rather than being requested or entered by the employees. It appears that the percentage of recorded leave that was entered by supervisors varied by employee, with a higher percentage of animal control officers relying on the supervisor for input, as opposed to the shelter staff. There also appeared to be a correlation between employees who relied heavily on supervisors to enter their leave and the number of errors found. Of the instances identified where recorded leave was incorrect, most of the mistakes involved employees whose supervisors had entered their leave more than 60% of the time. Such a culture of reliance on management to enter leave time without a strong time tracking system promotes an environment where time reporting errors are more likely to occur.

Subsequent to our testing, management issued a memorandum and email to Animal Services personnel stating that all time off requests must be received through WorkForce.

**INCONCLUSIVE - REPORTED WORK HOURS MAY HAVE BEEN OVERSTATED (58 instances)**

We found instances where it appears that employee work hours may have been incorrectly overstated on the timesheets; however, the documentation is inconclusive. We are unable to determine whether the employees were incorrectly compensated.

- **Employees reported regular hours worked, but no documentation was found to support that the employee worked at all on those days. (40)** In these instances, employees recorded work hours; however, there were no key card door swipes, no computer or log in activity, or any other evidence to support that the employees worked that day. While there was no specific evidence found to indicate the employee was off for the day, it would be unusual for an employee to have worked a full day without leaving some type of record/evidence of working. Employees involved included animal control officers, shelter workers, a dispatcher, and the administrative specialist.

- **Employees recorded regular hours worked, but only limited documentation was found to support that the employee worked the time recorded. (18)** In these instances, employees reported working at least an 8-hour day, but documentation was very light to support that the full day was worked. For example, there was a single WorkForce entry for the day, but no key card door swipes or other computer activity. Employees included an animal control officer, dispatcher, and shelter workers.

We also found one employee, a shelter worker, who had a number of instances where only limited evidence was found to support that she worked those days, but recorded at least 8 regular hours on her timesheet. Most of these occurred during a time when the Interim Director allowed her to work from home due to a medical condition. In these instances, she had no door swipes and only sporadic emails and computer log in activity throughout the day. Since the work was performed at home, there was no way to determine if the hours reported were appropriate. According to the employee, her supervisors did not require her to document or submit anything that supported her time while working at home. She stated that she was told to leave her 8 hours “as is” for each day.
INCONCLUSIVE - REPORTED WORK HOURS MAY HAVE BEEN UNDERSTATED (51 instances)
We found instances where it appears that employee work hours may have been incorrectly understated on the timesheets; however, the documentation is inconclusive. We are unable to determine whether the employees were incorrectly compensated.

- **Employees appear to have worked but did not record regular hours worked, or recorded fewer work hours, than what was supported with documentation. (27)** In the majority of these instances we found employees had multiple key card door swipes throughout the day along with other evidence that supports the employees were working, such as active directory log in activity and WorkForce entries.

- **Employees had no regular hours but it appears they came into the facility. (24)** In these instances, employees had one, or a limited number of door swipes on days when they did not report any regular hours worked. It does not appear that the employees worked throughout the day, but may have stopped by the facility for a brief period of time. It is unknown what the employees did on these occasions or how long they were actually there. Employees involved included animal control officers and shelter workers.

Based on our interviews with Animal Services staff and management, it was not unusual, especially with animal control officers, for employees to trade shifts but not record the actual hours worked on the timesheets. It appears that the instances identified may represent days or times when employees traded shifts or “flexed” their work schedules; however, without documentation to support such schedule changes, we cannot determine if any of these days offset. Additionally, during this time, all of the Division’s employees were classified as “non-exempt,” and therefore, were required to accurately record their actual time worked each day. Employees involved included animal control officers, shelter workers, a dispatcher, and the former shelter manager.

REPORTED WORK HOURS WERE INCORRECT – FLEXING WORK HOURS (34 instances)
We found additional instances where it appears that employees may have been “flexing” their work hours between different days but were not recording the actual hours worked on their timesheets. It does not appear that these employees were incorrectly compensated.

- **Employees worked fewer hours than what was recorded on the timesheets, but appear to have made up the time on another day.** In these instances, the time recorded for a particular day appeared incorrect, as fewer hours were worked than were recorded; however, we also found days subsequent to, or preceding, that day where it appears more hours were worked than were recorded.

STANDBY PAY/CALL OUTS
The Division’s animal control officers are assigned on-call standby duty to handle emergency calls during non-business hours. For the Animal Control Division, the standby period covers 5:00pm to 8:00am Monday through Saturday, and all day (8 a.m. to 8 a.m.) Sunday and holidays. According to County policy, when an employee is called out during the standby period, he/she is to be paid a minimum of 2 hours for the first call out, regardless of the time spent responding. They are to be paid for the actual hours worked on subsequent call outs during the same standby period. (Exhibit C-3) According to Animal Services policies, all call outs are to be logged into the Chameleon System.
In a separate analysis, we reviewed the standby and call out hours recorded for each animal control officer during the testing period and found instances of the following:

- Officers did not apply the call out minimum policy correctly. For example, officers intentionally did not apply the call out minimum to the first call of the standby period, as required, and instead applied it to the shortest call out. This typically occurred when the first call out was two (2) hours or more, which would have eliminated the employee’s opportunity to benefit from the first call out minimum policy. According to the Enforcement Supervisor, prior management had instructed staff that they could choose the call out to which they wanted the call out minimum applied.

  Subsequent to our testing, management issued a memorandum and email to all Animal Services officers indicating that the Division had not been accurately following the County's standby and call out policy, and clarifying the proper coding of call outs in WorkForce.

- Call outs reported in WorkForce were not always supported with a corresponding log entry in the Chameleon system.

- An officer worked five (5) hours at an adoption event and recorded regular hours on his timesheet, while he was also on standby status and receiving standby pay. According to County policy, employees are not entitled to standby pay when they are scheduled to work, as standby hours must be outside the scheduled (regular or modified-schedule) workday. (Exhibit C-3)

  It appears that employee work hours were incorrectly overstated on the timesheets.

  It appears that additional employee work hours may also have been incorrectly recorded on the timesheets and either overstated or understated; however, the documentation is inconclusive. We are unable to determine whether those employees were incorrectly compensated.

  It appears that employees have been “flexing” their work hours between different days, and/or trading shifts with coworkers, but not recording the actual days or hours worked on their timesheets.

  It appears that animal control officers have not been recording standby call outs correctly.

  Allegation #2 – The Animal Services shelter was understaffed, partly due to management intentionally holding a vacant position open until a former employee (retired) could apply.

Scope of testing: 12/01/2014 through 07/15/2015

The Animal Services shelter in Palmetto includes 50 dog adoption kennels and 30 dog impound kennels, 5 of which are designated as quarantine kennels. When the shelter population warrants it, most of the kennels can be split into an inside and outside kennel, increasing the capacity from 80 up to 150 dogs.

During the testing period, the shelter had an indoor free range cat room and separate intake and isolation areas. Based on the Association of Shelter Veterinarians’ (ASV) recommendation to allow 18 square feet of space per cat, the shelter could ideally accommodate approximately 40 cats. (Exhibit D-1) The Downtown Meowtown Adoption Center (DTMT), which included 9 cat enclosure areas, was also open during our testing period, and according to the guidelines, could also accommodate approximately 40 cats.
Based on kennel statistics obtained from the Animals Services Chameleon database, there was an average of 155 cat and 207 dog intakes per month during the period examined, and an average of 97 cats and 120 dogs remained at Animal Services at the end of each month.

<table>
<thead>
<tr>
<th>Shelter Population Statistics</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. of Days</td>
</tr>
<tr>
<td>Dec-14</td>
</tr>
<tr>
<td>Jan-15</td>
</tr>
<tr>
<td>Feb-15</td>
</tr>
<tr>
<td>Mar-15</td>
</tr>
<tr>
<td>Apr-15</td>
</tr>
<tr>
<td>May-15</td>
</tr>
<tr>
<td>Jun-15</td>
</tr>
<tr>
<td>Jul-15*</td>
</tr>
<tr>
<td>Totals</td>
</tr>
</tbody>
</table>

*-7/1/2015-7/15/2015

Average: 155 97 207 120

Avg During Beth Lewis tenure Apr-Jul 2015: 193 136 225 146

According to the ASV, the National Animal Control Association (NACA) and the Humane Society of the United States (HSUS) recommend a minimum of 15 minutes of care time per day for feeding and cleaning each animal housed in the shelter. (Exhibit D-2)

Dogs - Based on these guidelines, the minimum number of hours needed to care for 120 dogs is 30 hours each day. This indicates the shelter would need to allocate 3.75 full-time positions each day to feed and clean the dog kennels. (30 hrs / 8 hr day = 3.75 FTE)

Cats - The number of cats reported above includes those being housed at both the Palmetto and DTMT locations. We were unable to find a Chameleon report that identified the cats being kept per location; however, based on the ASV’s guidelines, it appears that the Palmetto shelter would need to allocate 1.25 full-time positions each day to clean and care for 40 cats. (10 hrs / 8 hr day = 1.25 FTE). During this time, the DTMT was staffed entirely by volunteers, so Animal Services staffing would not have been necessary at that location. (Currently, the DTMT facility is staffed by one full-time Animal Services employee).

Based on the average population during the testing period, the Division would have required, in total, approximately 5 full-time positions to care for all of the animals at the Palmetto facility each day. During the period that Beth Lewis was shelter manager (3/25/15 – 7/15/15), kennel statistics indicate the shelter population had increased to an average of 146 dogs and 136 cats. A shelter population of this size would require approximately 6.7 full-time positions each day to care for the animals at the Palmetto facility.
During the testing period, the shelter staffing levels provided for a supervisor (shelter manager) and eight (8) animal care specialist positions. Each day one of the staff members was assigned to work in vet services, while the other employees were assigned to clean, feed, and care for the animals, as well as manage the front counter (reception area).

Based on an interview with the Interim Director and a review of his emails, it was confirmed that one of the animal care specialist positions was held open so that a former employee could apply for the position. This individual, who had previously retired from the County, was not yet eligible for re-employment due to Florida Retirement System (FRS) restrictions. It appears that the position was held open for approximately four months, leaving the shelter operations with an unfilled position during this period. The employee, who was interviewed along with 6 other applicants, was deemed to be the most qualified and was ultimately re-hired by the County. He began working at the shelter on July 13, 2015.

Also during this time, a member of the shelter staff was not always able to perform cleaning duties or animal care, due to a medical issue, and was frequently assigned to work at the front counter. From June 17, 2015, until July 5, 2015, the employee was put on bed rest and not able to come in to the shelter at all. During this period, the employee was provided remote access to email and permitted to work from home by the Interim Director. While the shelter appears to have utilized two temporary employees for several days during this time, this situation also appears to have left the shelter short-staffed. It was also noted that while it is within a Director’s discretion to authorize an employee to complete certain projects from home due to extenuating circumstances, the Manatee County Personnel Policy, Rules and Procedures Manual requires approval from the Human Resources Director prior to work being done. (Exhibit C-4) The Interim Director did not request or obtain this approval.

During her tenure, Beth Lewis created and used daily rosters to assign duties to the shelter staff. Rosters were located for 59 of the days during the period examined. A review of these daily rosters revealed that during those days, there was an average of only 4.4 employees available each day for shelter cleaning and feeding, and on some days there were as few as 3.2 employees available. In addition, we found that on those days, the shelter never had the recommended minimum number of staff (6.7 FTE) available to care for the average number of animals maintained at the shelter.

In their 2014 report, Matrix Consulting identified staffing needs at the shelter. It was recommended that Animal Services add a Veterinarian or additional vet technician position to ensure adequate staffing allocation. The report stated that “the animal care staffing is tight and one additional position could easily be warranted to provide more adequate animal care and cleaning of the shelter. However, due to other changes that are recommended, the time spent by these individuals supporting the Vet Tech and others should be reduced.” (Exhibit E-1) In June 2015, a second vet tech position was added to the Animal Services staff.

It appears that the Animal Services shelter was understaffed during the period Beth Lewis was employed by Animal Services, partly due to the Interim Director holding a position open so a former employee could apply.

It also appears that other factors may have contributed to the understaffing during this same time, including a significant increase in the shelter population, and a shelter worker who was unable to perform any cleaning or animal care due to medical issues.
**Allegation #3 – Intake vaccinations were not administered properly.**

**Scope of testing: 12/01/2014 through 07/15/2015**

Part I - Animals were not given intake vaccinations when they entered the shelter.

The Animal Services Standard Operating Procedures and industry standards all indicate that intake vaccinations are crucial to the health of the shelter’s animal population and should be given immediately upon entering the shelter. Industry standards also recognize that protocols vary for each individual shelter. (Exhibit F) Animal Services Shelter Procedures indicate that a vet tech is responsible for intake vaccines and exams, medical documentation, testing and evaluating, medicating, and treating animals for medical conditions. (Exhibit G) According to the Animal Services’ vet tech, it is daily protocol to first evaluate the current population of animals at the shelter and provide the required medications for the day. Once this task has been completed, the vet tech then processes the animals needing intake vaccinations.

Based on the Kennel Stats report obtained from the Animals Services Chameleon database, there were 2,692 animals listed in the kennel inventory during the testing period. A statistical sample of 128 animals was randomly selected from this report, which resulted in 135 animal intakes during the period (some animals came into the shelter more than once during the testing period). In reviewing those 135 intakes, it was determined that 38 were not eligible to receive vaccinations immediately upon arrival to the shelter due to a variety of circumstances including aggressive behavior and bite cases, nursing puppies/kittens and mothers, and sick animals. An additional 11 did not receive vaccinations as they were either returned to their owner or transferred to a rescue organization prior to being vaccinated.

Of the 86 animals identified which should have been vaccinated on intake, testing found that only 50% of them received the vaccinations within 24 hours of arrival to the facility and 74% were vaccinated within 48 hours. On average, the animals were vaccinated within 36 hours of intake. The results of our testing are depicted in the following chart.

<table>
<thead>
<tr>
<th>Time to Vaccinate</th>
<th>Animals Vaccinated</th>
<th>Percentage</th>
<th>Cumulative Totals</th>
<th>Animals Vaccinated</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 2 hrs</td>
<td>13</td>
<td>15.12%</td>
<td></td>
<td>13</td>
<td>15.12%</td>
</tr>
<tr>
<td>Less than 4 hrs</td>
<td>11</td>
<td>12.79%</td>
<td></td>
<td>24</td>
<td>27.91%</td>
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<tr>
<td>Less than 8 hrs</td>
<td>4</td>
<td>4.65%</td>
<td></td>
<td>28</td>
<td>32.56%</td>
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<tr>
<td>Less than 12 hrs</td>
<td>-</td>
<td>0.00%</td>
<td></td>
<td>28</td>
<td>32.56%</td>
</tr>
<tr>
<td>Less than 24 hrs</td>
<td>15</td>
<td>17.44%</td>
<td></td>
<td>43</td>
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</tr>
<tr>
<td>Less than 48 hrs</td>
<td>21</td>
<td>24.42%</td>
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<td>64</td>
<td>74.42%</td>
</tr>
<tr>
<td>Over 48 hours</td>
<td>22</td>
<td>25.58%</td>
<td></td>
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<tr>
<td>Total</td>
<td>86</td>
<td>100.00%</td>
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</table>

**Average time to vaccinate - 36 hours**
A review of the 2014 Matrix Report also indicated that “the recommended vaccinations required at intake are not always conducted during intake. It may be the next day, or in some cases several days, before intake vaccinations are conducted due to staffing levels.” In addition, the report states that “the current allocation of a single veterinarian technician for MCAS is insufficient to provide the needed services and care for animals in a timely manner all the time.” (Exhibit E-2) A second veterinarian technician was hired and began employment with Animal Services on June 30, 2015.

While industry standards provide some leeway in regards to individualized shelter protocols, it appears that intake vaccinations were not being given to animals immediately upon entering the shelter.

Part 2 – Vet Services was improperly pre-mixing vaccines used at intake.

In June 2015, former shelter manager Beth Lewis found that animal vaccines were being drawn up (reconstituted) and stored in the refrigerator prior to being used. She and the vet tech had differing views on the shelf life of the vaccines once they had been mixed. At that time, Ms. Lewis believed the vaccines had a shelf life of only 10 minutes after being reconstituted, while the vet tech believed they were good for 24 hours.

In an effort to determine the appropriate shelf life of the pre-mixed vaccines, Beth Lewis, Bill Hutchison (Interim Director), and the vet tech reached out to various sources for further clarification. All three of them received different responses. According to the University of Florida’s Maddie’s Shelter Medicine Program, based out of their College of Veterinary Medicine, a reconstituted vaccine should be administered to an animal within 30 minutes. According to the County’s contract veterinarian, vaccines should be used immediately, within 15-20 minutes. The vaccine’s manufacturer, Merck Animal Health, referenced the 2011 Vaccination Guidelines established by the American Animal Hospital Association (AAHA), which state that a reconstituted vaccine should be administered within 1 hour. The AAHA standard seemed to support Animal Services’ Intake Exam Procedures which also required that reconstituted vaccines be used within an hour of mixing and stored in the refrigerator during that time. (Exhibit H)

Upon learning of the error in protocol, Veterinary Services staff was instructed to prepare only the vaccines needed at the time they were to be administered to an animal, and to dispose of any excess that was not used. An observation of the Veterinary Services refrigerators was completed by auditors on November 5, 2015, and no pre-mixed vaccines were observed. We did note, however, that while the Animal Services’ Standard Operating Procedures are in line with the 2011 AAHA Vaccination Guidelines which provide that reconstituted vaccines be given within one hour of mixing, the procedures do not address the practice of disposing of unused vaccines within one hour.

It appears that the protocols for reconstituting and administering vaccines within an hour were not strictly followed at the time of the reported incident. However, it appears that at the time this complaint was submitted to the County, the Veterinary Services staff had already addressed the issue and implemented new procedures to ensure compliance with the standards.
**Allegation #4 – Former shelter manager’s “project” dog was targeted for euthanasia by other employees.**

The protocol for selecting animals for euthanasia, under the leadership of Bill Hutchison, was to utilize a team/committee approach. Each week, senior staff members, including the Interim Director, Interim Division Manager, former Shelter Manager, Enforcement Supervisor, Vet Tech, and Administrative Specialist would meet to discuss the Division’s operations. During this meeting, animals were sometimes considered for euthanasia. The animals were discussed on a case-by-case basis, with consideration given to shelter capacity, unsuccessful placement with rescue groups, and behavioral issues (vicious, bite, and/or aggressive dogs). The selection process required at least three of the attending senior staff members to agree that the animal should be euthanized. This approval was documented with the three signatures on the appropriate animal’s kennel/cage card.

During her employment with Animal Services, Beth Lewis introduced a “Project Dog” program to the shelter, wherein employees would essentially “adopt” a dog and spend time with that dog in order to aid in the dog’s socialization while in the shelter. Beth Lewis had been personally working with a dog named Bella as part of this program. On May 5, 2015, Bella was selected for euthanasia through the process noted above. Based on a review of information contained in the Chameleon database, a review of documentation, and interviews conducted with current and former staff, including Beth Lewis, we noted the following:

- **2/26/2015** - Bella arrived at the shelter as part of a bite call.
- **3/24/2015** - Bella received a behavioral assessment from a dog trainer who stated that she appeared very fearful and recommended she go to a rescue group or very experienced dog handler.
- **3/30/2015** - Beth Lewis noted on Bella’s records that she was very fearful, growls.
- **3/31/2015** - Bella was networked to local rescues.
- **4/2/2015** - Beth Lewis noted on Bella’s records that she go to a rescue only.
- **4/7/2015** - A note in Bella’s records stated that Bella tried to bite a staff member.
- **4/21/2015** - A note in Bella’s records stated that Bella tried to bite another staff member.
- **4/21/2015** - Staff reached out to the rescues again. Six rescues were contacted; all passed.
- **5/2/2015** - An adoption event was held. Bella was not adopted.
- **5/5/2015** – A meeting was held with management and senior staff members to discuss the kennel inventory and consider animals for euthanasia. Bella, among others dogs, was selected for euthanasia. As required, Bella’s kennel/cage card was signed by three of the attending senior staff members, one of whom was Beth Lewis.
- **5/7/2015** - Bella was transferred out to a rescue group.

Through a review of emails and interviews conducted with the management and senior staff members involved, it was confirmed that during this time, the atmosphere at the shelter was very tense, and it appears that relations were strained among the employees. However, it appears that Bella was selected for euthanasia based on a number of factors considered for all euthanasia cases, including the high population of animals at the shelter during that time, Bella’s documented behavioral issues, the length of time Bella had already been in the shelter, and the unsuccessful attempts to have Bella placed with a rescue group. Furthermore, Beth Lewis was one of the three staff members who signed off on the kennel/cage card, approving Bella for euthanasia.

**It does not appear that Beth Lewis’s “project” dog was targeted for euthanasia by other employees.**
Recommendations

Based on the results of this investigative review, the following recommendations are provided:

1. Consideration should be given for implementing some type of time tracking system for the Animal Services Division to ensure staff and supervisors accurately account for their work time.

2. Employees should submit all leave requests through WorkForce for proper approval and documentation.

3. Animal Services staff should input accurate work time into their electronic timesheets prior to submitting them for approval. This includes reporting actual hours worked when trading shifts with other employees or flexing work time.

4. Supervisors should track employee leave time and review that information prior to approving any timesheets, to ensure the time has been recorded correctly. Any corrections should be communicated with employees immediately.

5. Employees should adhere to County policies relating to the reporting of standby time and call outs.

6. Intake protocols should be evaluated and updated, if necessary, to improve the time with which animals are vaccinated.

7. The Animal Services’ Standard Operating Procedures should be updated to include the requirement to dispose of reconstituted vaccines within an hour of mixing, if not used.

We appreciate the efforts and timeliness by the Animal Services Division in addressing the issues raised during this investigative review and look forward to improved monitoring controls and accountability for the Division.

Lori Stephens, CPA, CFE
Director of Internal Audit

INVESTIGATIVE TEAM:

Bobbie Windham, CIA, CFE
Deputy Director of Internal Audit

Glen Riley, CPA
Senior Internal Auditor
Exhibit A

Complaint
WHY WAS BETH LEWIS FIRED? Read the following unedited email from Beth to find out. These allegations should be investigated.

It has been a difficult few days for myself, my family, the community and most of all for the animals. I have seen many articles, news reports and face book postings which state truths and non-truths. It is enough to make a person's head spin.

These are the facts of my tenure as shelter manager at Manatee County Animal Services. During my interview Bill Hutchison stated "We need someone to come in here and make changes." I stated that I will not be the token shelter manager but will fight for what is the right thing to do. He agreed but I quickly learned that this is not what he wanted. I was under minded on every decision. The first time I completed the timesheets, it was apparent that time was being stolen from the county by the employees. I was told by Joel Richmond that "we go by the honor system here." It was not honorable to forget that you called in sick a day then put on your time sheet that you had worked that day. It is not honorable to leave half day for personal reasons and still put that you worked a complete shift. So one of the first items which I initiated was for the employees in which I was responsible for signing their timesheets were to sign in and out every day, including myself. I had employees go to other supervisor's to complain, go to HR to complain and go to Mr. Hutchison to complain. At one point Bill told me that I cannot asked them to sign in and out. Something I thought would be so simple for accountability and to protect the county turned into over a month long battle.

There were many days that I only had two employees to clean the entire shelter. With the shelter double capacity, this was an impossible task to complete. I would spend anywhere from 2-4 hours a day cleaning just to make sure the animals were taken care of then work on my supervisor duties. I had one vacant position since the day I started and one employee which was having a difficult pregnancy which meant she was out of work quite frequently and when she was there, she could not complete any cleaning duties. Bill would not let me filled this position because he felt he did a former employee injustice and he wanted this position held until this employee could come back. This employee is to come back this week. Four months later.

I inquired on why animals were not given intake vaccinations when they entered the shelter. The response given to me was that they have tried it before and it was just too much work. Too much work? I thought that was what we were there for. Was it too much work for the vet tech to come in on her day off, take her assistant, get paid time and a half to take a dog named Mo to Humane Society Tampa to have the dog's leg amputated and then complain about just sitting around all day? Why did it take three people to deliver one cat to downtown meowtown when the shelter was struggling to clean the kennels on a daily basis? Every time I questioned these issues, I was outcast more. I noticed that in vet services they were pre-mixing in DHPP and the FVRCP intake vaccinations. When I inquired to Sarah concerning this, she stated that they were good for 24 hours after they were mixed. Knowing that this was not true, I sent this question to Maddie's Shelter Medicine for their response. They stated that after they are mix it is only good for 20 minutes. Now I knew part of the reason of these animals were getting sick, the vaccinations they were given were bad. This did not go over very well.

I truly realized who I was dealing with when I was confronted by the hate of my fellow employees. I was working with a dog to assist this dog in becoming an adoptable pet. This dog was shut down, shaking in the corner and no one could go near her. She was going to be my first "Project Dog" a program which I created and introduced at Hillsborough Pet Resource Center. Within weeks, this dog was walking all around the shelter with no leash right by my side. She was very fearful of men and many of the male
volunteers assisted working with her to continue her progress. Everyone saw my commitment to this dog. This dog never bit anyone though she did snap when men ignored her warning signs of wide eyed, low grow, backing up. Two supervisor employees recommended her to be euthanized. There were many other dogs which had not shown improvement and had shown aggression. I quickly realized that this dog was targeted because of me. Wow, these are the people I was working with. Through much controversy the dog was rescued. I was written up and told not to interact with the “crazies and I hope you learned your lesson”, I did. I did everything I was told and complied, for about two weeks. I had to make a choice. Do I give in or do I go down with a fight?

A dog named Padi came in for a bite case, I saw the devotion from the family, the co-workers who were around him on a daily basis, how well trained and the great temperament this dog had. I spent time with this dog on a daily basis and also gave the family a phone number of a person which could guide them. Nothing else. We work for the citizens of Manatee County. Are we not to assist? If your child had a brain tumor and you knew the person which could lead you in the right direction, wouldn’t you want that information?

I admire Bill Hutchison. He is a very intelligent man that has visions for the future. He has been fighting health issues and very over worked. I have had conversations with him and the next day he would ask why I did something when it was something we spoke of the day before about. I thank him for the opportunity but when I first began he told me that in 2011 he moved to announce that Manatee County was to be the first NO KILL shelter in the state of Florida. He told me he made a mistake that he needed to calm the community down at that time and he did not realize the consequences. These words still echo in my head. Was that why he hired me…to calm the community down or to make a change. I will probably never know or work in the animal care field anymore but I have my head high knowing I gave it the good fight.

Sincerely,
Beth Lewis

From Support No Kill Manatee County TO FILE A COMPLAINT about the Manatee County Shelter, click on this link:
http://cac.mymanatee.org/etra kit/CRM.aspx

Like Comment Share

Kathy Monzingo Moreno, Elizabeth Davis, Mary Prisament Lupi and 201 others like this.

222 shares

Betsi Tidd Siddall Can you send this to the local newspapers?
4 · July 18 at 10:31am

Support No Kill Manatee County Betsi Tidd Siddall I believe Media will be involved. The Bradenton Herald is not exactly impartial.
3 · July 18 at 5:09pm
Exhibit B

Animal Services Division
Organizational Charts
Exhibit C

Manatee County
Personnel Policy, Rules, and Procedures
IV. PAY, HOURS OF WORK AND WORKWEEK

A. General Policies

1. Due to the variety of services provided by County departments, certain employees may be required to work varying days and hours. Department directors schedule work that is necessary and beneficial for the efficient operation of the County. It is the responsibility of the department director to manage overtime within budgetary constraints. Pursuant to 29 C.F.R. § 553.23, by accepting employment with the County, all overtime-eligible employees agree that the County may elect to provide compensatory time in lieu of payment of overtime work in cash pursuant to its compensatory time policies. Employees may also be required, at the discretion of the County, to use compensatory time in lieu of vacation pay when requesting vacation time off.

2. Non-Exempt Employees
   a. For purposes of this Policy, all employees not considered exempt will be considered non-exempt, and therefore subject to the minimum wage and maximum hour provisions of the Fair Labor Standards Act (FLSA). Non-exempt employees are eligible to earn overtime (including premium pay differential when applicable) or compensatory time at one and one-half (1 ½) times their hourly rate.
   b. Whenever a non-exempt employee becomes promoted or reclassified to an FLSA-exempt position, the employee shall have any accrued compensatory time paid to him/her at their rate of pay of the non-exempt position they held immediately prior to their promotion.

3. Exempt Employees:
   a. For purposes of this Policy, exempt employees are expected to work whatever hours are necessary to accomplish assigned duties and responsibilities. However, it is recognized that because exempt employees are often required to work irregular and/or extended hours, it is appropriate that they be provided a certain latitude in occasionally being away from their place of work during normal work hours. It is the responsibility of the immediate supervisor or the department director to determine if the absences are inappropriate.
   b. Exempt employees are not eligible to be awarded compensatory time or premium pay differential.
   c. Department directors may suggest the exemption of certain job classifications from the provisions of the Fair Labor Standards Act (FLSA). However, the final determination is made and executed by the Human Resources Director, in consultation with the County Attorney’s Office.
of the employer during the employee's normal working hours on days when he or she is working constitutes hours worked except for worker compensation visits (see also section VII.B.8.a. of this Manual).

7. **Furlough** - Notwithstanding any other provision of these policies to the contrary, where the County Administrator (County Attorney for employees of that Office) determines that current budgetary conditions require a reduction in the overall hours employees work in order to remain within the authorized budget, the operational hours of any one or more office, service or function of the County may be reduced for one or more weeks, days or hours, either consecutively or sporadically. Such periods of reduction may be either by complete closure or operation with a less than full staff as deemed necessary. Employees working within such offices, services or functions will be placed on unpaid furlough during such periods, and hours spent on furlough shall not count as hours worked for any purpose. Pursuant to 29 C.F.R. § 541.710(b), the County Administrator (County Attorney for employees of that Office) is authorized to deduct hours spent on any furlough from any employee being compensated on a salary basis if budgetary constraints require the deduction.

8. **Electronic Timekeeping** – In recognition of the limitations which may be inherent in the electronic timekeeping systems the County may now or in the future use, including limitations on the delineation of actual lunch or break schedules, employees who are unable to enter the actual chronological times for such events shall not be subject to discipline for falsifying records. **FLSA non-exempt employees must, however, ensure that their actual hours worked each day are truthfully and accurately recorded in any such system to ensure proper payment of wages due, including overtime and premium pay.**

9. **Pay Class/Annual Base Salary Calculations** – Annual base salaries shall be calculated based upon the pay class and full time equivalent assigned to the position. Positions assigned to pay class 300 or 400 are calculated on 2080 hours. Positions assigned to pay class 324 are calculated on 2288 hours. Positions assigned to pay class 903 are calculated on 3328 hours.
6. Standby Status

a. Exempt employees are ineligible for standby pay.

b. Employees who are not otherwise informed that they have been scheduled to work and who are placed on standby status (instructed to be available but otherwise able to use the time effectively for personal purposes) may remain at home, or they may leave word how (pager, cell phone, etc.) and where they can be reached, but they must do one or the other. These employees receive straight time pay (compensatory time not allowed) for hours designated as standby assignment, with maximum accruable hours of three (3) in a 24 hour period. **Standby hours must be outside the scheduled (regular or modified-schedule) workday,** and may not be assigned to or worked by employees who do not work their regularly-scheduled shift immediately prior to standby assignment, or who are unable to respond, due to illness. Employees who receive advanced notice of a requirement to report for duty, even where such work is to be performed outside of a regular schedule, are not eligible for standby pay. Since assigned standby hours can vary according to circumstances, guidelines will be used to award compensation as shown below. (Note: No other proration methods are authorized):

   - Less than five (5) hours of standby status is ineligible for standby pay
   - One (1) hour of straight time pay for 5 up to 9 hours of standby status
   - One and one-half (1.5) hours of straight pay for 9 up to 12 hours of standby status
   - Two (2) hours of straight pay for 12 up to 16 hours of standby status
   - Two and one half (2.5) hours straight pay for 16 up to 20 hours of standby status
   - Three (3) hours of straight pay for 20 up to 24 hours of standby status

c. If employees on standby status are required to report for duty, they are paid for hours worked, with a minimum of two (2) hours for the first “call out” regardless of time spent responding. Thereafter, employees shall only be paid for the actual hours worked on subsequent “call outs” during the standby period. Call-out hours are eligible for premium pay differentials and count as hours worked towards overtime. In addition to the call-out hours, employees are also compensated for standby status as reflected under Section IV.C.6.b.

d. Employees placed on standby assignments must always be reachable by a pre-designated means of communication and able to arrive at the work location within the time established by the department director or designee. As employees are compensated for standby assignments, they must refrain from drinking, taking medications or engaging in any other conduct which would prevent being ready for duty. Further, if they are unavailable when called in, they will be subject to disciplinary action and will not be paid any standby pay for that assigned period.

e. Standby assignments should be distributed equitably among qualified employees, consistent with operational needs.
B. Allocation of Work Hours, Workweek and Work Period

1. The workweek starts at 12:00 a.m. on Saturday and ends at midnight the following Friday. The normal full-time work schedule includes forty (40) hours during the workweek. These hours should not be construed as either a fixed minimum or maximum. Work hours that exceed a normal workweek may be required. Except as provided herein or as determined by the department director, in conjunction with the County Administrator (County Attorney for employees of that office) and payroll, normal hours are Monday through Friday, 8:00 a.m. to 5:00 p.m.

2. Lunch periods- Bona fide meal periods (employee is completely relieved from duty for the purpose of eating regular meals) are not work time and are unpaid. The time scheduling and length of lunch periods are coordinated between the employee and the supervisor, according to that organization's needs. (Note: There is no federal or State of Florida law requiring meal breaks in industries or offices, with the exception that minors 17 years of age or younger shall not be permitted to work for more than 4 hours continuously without at least 30 minutes for a meal period.)

3. Break (rest periods) - Breaks (usually not more than 15 minutes each) may be permitted by supervisors when the work requirements allow them, and must be allowed for nursing mothers to express milk for up to one year after birth. Break periods are considered to be rest periods and must fall within working hours (work is performed immediately preceding and following the break period) and may not be accumulated for additional time away from work. (Note: There is no federal or State of Florida law requiring rest periods, but if they are offered, they must be counted as hours worked.)

4. Flextime is the generic term for flexible scheduling programs - work schedules that permit flexible starting and quitting times within limits set by management. Flextime requires employees to work a standard number of hours within a given time period (usually forty (40) hours during a five-day work week). Each County department has the option to use flextime, if it can be adapted to better meet that organization's unique needs. However, each County department or division which elects to permit flextime must, with the assistance of the Human Resources Director, adopt a flextime procedure which will be published to the department’s employees and which will be uniformly applied within that department or division.

5. Work-at-Home Program - The Manatee County Board of County Commissioners does not recognize a "work-at-home" program. There may be times when certain projects could be performed by employees who are at home due to extenuating circumstances. Any such projects must be authorized by the department director and approved by the Human Resources Director (County Attorney for employees of that office) prior to work being done. If a project is approved to be completed at home, the project must be familiar to the employee concerned and have definite parameters for measuring time necessary to perform the work. The employee will only be compensated for the standardized hours recognized for completion of the project. County equipment is not to be used outside the regular workplace, unless authorized by the department director and approved by the Human Resources Director (County Attorney for employees of that office). All hours worked at home must be reported.

6. Medical Attention - In accordance with 29 C.F.R., § 785.43, time spent by an employee in waiting for and receiving non-elective medical attention on the premises or at the direction
Exhibit D

Association of Shelter Veterinarians
Group Housing

The purpose of group housing in shelters is to provide animals with healthy social contact and companionship with other animals in order to enhance their welfare. In the context of this document, group housing refers to playgroups as well as group housing two or more animals in the same primary enclosure. Group housing requires appropriate facilities and careful selection and monitoring of animals by trained staff. This form of social contact is not appropriate for all individuals.

1. Risks and Benefits of Group Housing

There are both risks and benefits to group housing. Inappropriately used group housing creates physical risks of infectious disease exposure and injury or death from fighting. It also creates stress, fear, and anxiety in some members of the group. Group housing makes monitoring of individual animals more difficult, resulting in failure to detect problems or inadequate access to necessities like food and water for some animals. Staff safety may also be compromised when animals are housed in groups as it is generally more difficult to manage more than one animal in an enclosure. However, appropriately planned groupings for housing or play can be acceptable, and may even be desirable, when tailored to individual animals (Griffin 2002, 2006; Gourkow 2001; Kessler 1999b; Martens 1996; Overall 1997; Rochlitz 1998). Benefits of group housing include opportunities for positive interaction with other animals including play, companionship, physical connection, and socialization. Group housing can be used to provide a more enriched and varied environment.

2. Facilities

Essential physical features of a facility to support planned group housing include adequate size of the primary enclosure; multiple feeding stations and resting areas; and adequate space for urination and defecation. Adequate size of group housing is imperative to allow animals to maintain adequate social distances. For group housing of cats, a variety of elevated resting perches and hiding places must be provided to increase the size and complexity of the living space (Dowling 2003; Griffin 2006; Overall 1997; Rochlitz 1998). A minimum of 18 square feet per cat has been recommended for group housing (Kessler 1999b). Although no minimum has been recommended for dogs, for all species the size should be large enough to allow animals to express a variety of normal behaviors. (See section on Facilities for more information on primary enclosures.) Sufficient resources (e.g., food, water, bedding, litterboxes, toys) must be provided to prevent competition or resource guarding and ensure access by all animals.

3. Selection

Both group housing and playgroups require careful selection and monitoring of animals by staff or volunteers trained to recognize subtle signs of stress and prevent negative interactions (e.g., guarding food or other resources). Selection considerations include separation by age, behavioral assessment prior to grouping, and prevention of infectious disease through screening, vaccination and parasite control. Random grouping of animals in shelters is an unacceptable practice. Animals must not be housed in the same enclosure simply because they arrived on the same day or because individual kennel space is insufficient. Unrelated or unfamiliar animals must not be combined in groups or pairs until after a health and behavior evaluation is performed; animals should be appropriately matched for age, sex, health, and behavioral compatibility. Unfamiliar animals should not be placed in group housing until sufficient time has been given to respond to core vaccines. Intact animals of breeding age should not be group housed (Hickman 1994). If group housing is utilized short-term for intact animals, they must be separated by gender. Sexually mature dogs and cats should be spayed/neutered and allowed sufficient recovery time prior to group housing.

Animals who are not socialized to other animals as well as those who actively bully other animals must...
Population Management

Population management describes an active process of planning, ongoing daily evaluation, and response to changing conditions as an organization cares for multiple animals. Effective population management requires a plan for intentionally managing each animal’s shelter stay that takes into consideration the organization’s ability to provide care that meets the recommendations outlined in this document. The capacity to provide humane care depends on the number and condition of animals admitted and their duration of stay; the size and condition of the facility; staffing levels and training; and other factors as well as the number of available enclosures. There are many ways to maintain a population within an organization’s capacity for care whether in a shelter or home-based rescue organization. Active population management is one of the foundations of shelter animal health and well-being (Hurley 2004a), and must be based on an appreciation that capacity to provide humane care has limits for every organization, just as it does in private homes. When a population is not managed within an organization’s capacity for care, other standards of care become difficult or impossible to maintain.

1. Capacity for Care

Every sheltering organization has a maximum capacity for care, and the population in their care must not exceed that level. Factors that determine capacity for care include: the number of appropriate housing units; staffing for programs or services; staff training; average length of stay; and the total number of reclaims, adoptions, transfers, release, or other outcomes. Many factors can alter the capacity for care. For example, loss of animal care staff, or malfunctioning enclosures, can temporarily decrease the capacity for care until such time as new persons are hired and appropriately trained, or enclosures are repaired or replaced. Operating beyond an organization’s capacity for care is an unacceptable practice.

Maximum housing capacity must be based on the number of animals who can be adequately housed within available primary enclosures. (See section on Facilities and section on Group Housing for information on adequate housing.) Ideally, shelters should maintain their populations below maximum housing capacity to allow for daily intake as well as more flexibility when choosing appropriate enclosures for each animal. Maximum housing capacity must not be exceeded. Even though enclosures may be available, it may be necessary to leave some empty due to other constraints on capacity for care (e.g., staffing levels and opportunities for enrichment).

The National Animal Control Association (NACA) and the Humane Society of the United States (HSUS 2010) recommend a minimum of 15 minutes of care time per day for feeding and cleaning each animal housed in the shelter (9 minutes for cleaning and 6 minutes for feeding) (HSUS 2010; NACA 2009b). For example, if 40 animals are present, a minimum of 10 hours of care would be required for basic care (40 animals @ 15 minutes/animal = 10 hours). Ability to provide services such as medical and behavioral evaluation or treatment, adoption, spay/neuter or euthanasia can be similarly evaluated based on average time for service (Newbury 2009a, 2009b). Staffing or volunteer work hours must be sufficient to ensure that the basic needs of animals in the shelter are met each day.

Length of stay has a dramatic effect on the experience and needs of animals in shelter care. The type of care and enrichment provided to sheltered animals must be appropriate to the length of stay (Patronek 2001). Average or median length of stay is also a key factor contributing to the number of animals present in the shelter each day, which in turn affects the ability to provide adequate care. For example, if an average of 5 cats per day enter the shelter and each stays an average of 5 days, the average daily population would be 25 cats. If the average length of stay rises to 10 days with no change in the average intake, then the average daily population would double to 50 cats.

Capacity to provide humane care has limits for every organization, just as it does in private homes.
Exhibit E

Matrix Consulting Group
Evaluation report of Animal Services
It should be noted that the animal care staffing is tight and one additional position could easily be warranted (under existing operational practices) to provide more adequate animal care and cleaning of the shelter. However, due to the other changes that are recommended, the time spent by these individuals supporting the Vet Tech and others should be reduced. So an additional position is not recommended at this time until MCAS can realize the impact that will be achieved from the other staffing changes.

The only additional personnel change being recommended at this time is the filling of the MCAS dispatcher position at the appropriate level. Currently the dispatcher position is filled with an Animal Control Officer. This position does not need the skills, experience and background of an Animal Control Officer to complete the assigned duties. Additionally, a position of this nature is typically classified at a lower level than an Animal Control Officer. Having an ACO assigned to this position, reduced the number of individuals in the field to handle fieldwork, calls for service, and proactive efforts. No additional positions are recommended for ACO. The existing complement is sufficient to handle the existing workloads that the County has experienced in recent years. MCAS should fill the dispatcher position at the classified level with an individual who is not an ACO.

**Recommendation:** MCAS should fill the dispatcher position at the appropriate level rather than with an individual classified as an Animal Control Officer.
suitable medical care is available, MCAS is limited to what can be provided on-site since it is only staffed with one vet technician who relies on support from animal care staff or volunteers to supplement what she can provide. All medical care that must be provided by a veterinarian is handled off-site. This involves extensive staff time (approximately 1 to 2 hours per day per trip to the veterinarians office) to transport animals to and from the veterinarian’s office.

(b) Intake Program.

MCAS has a well-defined and comprehensive protocol for the processing of animals as they are admitted to the shelter. However, due to staffing and time constraints, these protocols are not always followed with the specified time period and animals are not comprehensively assessed and treated immediately upon intake. In fact, the recommended vaccinations required at intake are not always conducted during intake. It may be the next day, or in some cases several days, before intake vaccinations are conducted due to staffing levels. This creates a significant risk for problems to develop regarding management of disease and maintaining healthy animals. These issues can be addressed through the following staffing changes at MCAS.

(c) Staffing Changes.

After review of the staffing requirements at MCAS, an alternative approach for the provision of medical care should be considered. The current allocation of a single veterinarian technician for MCAS is insufficient to provide the needed services and care for animals in a timely manner all the time. While MCAS has performed well under existing limitations (limited staffing and poor facilities), there is an opportunity to provide
Exhibit F

Various Industry Standards
Intake Vaccinations
Preventive Recommendations

Vaccinations
Vaccination recommendations for the shelter environment differ from those recommended for animals in a home. Most often, previous vaccination status of shelter animals is unknown. The most prudent approach, therefore, is to consider each animal entering the facility as unvaccinated.

Vaccination in the shelter setting will not prevent outbreaks of disease. Early vaccination, meaning the moment the animal arrives, or as close to arrival as possible, gives the animal an advantage in the race between immunity and disease. If the animal was exposed to the disease before coming into the shelter for vaccination, he may still break with disease. In some cases, however, vaccination may lessen the intensity or duration of disease. Also, some animals will not respond to vaccination in a protective manner. For those individuals, no degree of vaccination will prevent disease.

Vaccines not to use:
Using too many vaccines can have a detrimental effect. Too many antigens administered at once can overwhelm the immune system and lessen the strength of the immune response. The more vaccines used increases the likelihood of an adverse vaccine reaction.

Rule out vaccinations for diseases that are self-limiting or treatable. In the shelter setting, the Lyme vaccine, giardia vaccine, corona, leptospirosis, Chlamyphila (C. felis), ringworm (m. canis), FeLV and FIP vaccinations may be wasted money. Many of these vaccinations are of so little added benefit that they are not worth the cost of administration.

Lyme – Effective tick preventive is the best Lyme disease preventive. This vaccine has a high rate of vaccine-associated illness. It is not fully protective and will cause false positive when screening for Lyme disease.

Giardia – This vaccine is expensive and may be considered for limited times during disease outbreak. Most shelter animals are not at great risk for exposure.

Corona – This infection is considered to be protective against parvovirus and is certainly the lesser of two evils. Also, the vaccine is not terribly protective.

Leptospirosis – Vaccinations for leptospirosis are of limited efficacy and are available for only a small number of the strains that exist. Rodent control and not allowing shelter animals to drink standing water outdoors will provide greater protection against Lepto than the vaccine.

Chlamyphila – Because signs of disease associated with C. felis infection are comparatively mild and respond favorably to treatment, and because adverse events associated with use of C. felis vaccines are of greater concern than adverse events associated with use of many other products, routine vaccination against C. psittaci infection is not recommended.

Ringworm – The m. canis vaccine is no longer being produced because it had a tendency to cause the disease symptoms to disappear, but not eliminate the carrier status of the cat. There may be some vaccines still available through...
tained. Differences in vaccine costs become considerable when multiplied by thousands of doses. Therefore, only those antigens in which a clear benefit against common and serious shelter diseases is indicated should be used. Adopters should be encouraged to discuss an individually tailored vaccination program with their own veterinarian following adoption.

Core vaccines in shelter environments

Feline parvovirus, FHV-1, and FCV should be considered as core vaccines. All other vaccines should be considered as noncore or not generally recommended vaccines (Table 3).

Modified-live vs killed agent vaccines in shelter environments

In most cases and when available, modified-live agent products should be used. The greatest benefit of modified-live agent vaccines in shelter environments is rapid onset of protection, an important factor when exposure is likely to occur soon after admission. In addition, live agent vaccines are better able to overcome MDA in young kittens than are inactivated agent vaccines, thus helping to protect the most vulnerable and most adoptable shelter subpopulation.39

Modified-live agent vaccines for respiratory tract pathogens may cause mild clinical signs of disease, leading to vaccine-induced disease resulting in euthanasia. Fortunately, most shelters do not euthanize all cats with clinical signs of URD. However, even in shelters that must euthanize cats with clinical signs of URD (caused by natural infection or, erroneously, by vaccination), the overall rate of euthanasia may not be affected, as these shelters generally have overwhelming numbers of healthy, adoptable cats. The population may still benefit from decreased disease in adopted cats and, consequently, improved public perception and increased numbers of adoptions.

Intranasal vs injectable vaccination in shelters and other multiple-cat environments

In addition to inducing local immunity, IN vaccination for FHV-1/FCV has the advantage of a rapid onset of protection.3,4,5 Results of 1 study indicate that cats receiving 1 dose of FHV-1/FCV/FPV vaccine administered IN had significantly less severe clinical disease than unvaccinated control cats when challenged with virulent FHV-1 4 or 6 days after vaccination. Because of the likelihood of early viral exposure, FHV-1/FCV vaccines for IN administration may be advantageous in shelters and other environments with endemic infections. Such vaccines may cause mild clinical signs of disease, creating the same concerns for vaccine-induced disease resulting in euthanasia as previously described. However, results of 1 shelter study indicate that there was no difference in the incidence of sneezing within 7 days after vaccination when cats were given vaccines administered via injection and IN, compared with those given a vaccine via injection only.

Timing of vaccinations

When possible, vaccination prior to shelter admission is ideal (eg, for owner-surrendered cats or for those returning from foster care). In almost all other cases, cats entering a shelter should be vaccinated immediately on admission. A delay of even 1 or 2 days compromises a vaccine's ability to induce protection.

It is increasingly common for shelters to hold cats for months or even years. Cats entering a long-term care facility (or any cat for which a long-term shelter stay is anticipated) should be vaccinated for rabies, depending on local regulations, as well as core vaccines at the time of admission. Noncore vaccines should be considered as for pets, depending on risk profile. In the event a cat resides in the facility for a sufficiently long period to justify booster vaccination, it is recommended that the same schedule for revaccination be followed as is recommended for pets. There is no indication for more frequent vaccination in a long-term shelter facility with a stable population.

Patient considerations

General health—Most kittens and cats should be vaccinated regardless of physical condition. If the cat's immune system is so weakened that a modified-live agent vaccine will induce disease, exposure to the wide variety of infectious pathogens present in most shelters will likely result in death of the cat. In general, if a cat cannot be safely vaccinated, it cannot safely remain in an animal shelter. Injured or ill cats should then be revaccinated when healthy (no earlier than 2 weeks later).

Kittens—Remaining in foster care in clean homes is preferable for kittens younger than 8 weeks of age. Interference from MDA and immature immune systems negatively impacts the ability of vaccines to induce a protective immune response, and kittens placed in shelters are at high risk of disease. If kittens younger than 8 weeks of age must be kept in shelters, they should be kept quarantined in areas isolated from the general population. In rare and unusual circumstances (eg, when challenge dose is high and exposure is not avoidable), FHV-1 and FCV vaccines may be administered IN or via injection to kittens younger than 6 weeks old. Additionally, some facilities may administer 1 or 2 drops of vaccine IN rather than administering the entire dose to each kitten. However, unless specifically stated on the label, manufacturers have not evaluated the safety and efficacy of these vaccines when used in this manner and such practices have not been independently evaluated. Vaccine-induced URD and other adverse events may be encountered, especially in kittens with little or no MDA. Nonetheless, in environments with endemic URD in which the risk of serious disease is high, the benefits of vaccinating in this manner may outweigh the risks.

Injectable or IN vaccination with a modified-live FPV vaccine may potentially cause cerebellar hypoplasia if given to kittens prior to 4 weeks of age.31 Kittens in high-risk shelters should therefore be vaccinated with a modified-live FPV vaccine via injection no sooner than 4 weeks of age. Vaccination should be repeated every 2 to 4 weeks until 16 weeks of age. The shorter end of the intervalvaccination interval and early age of first vaccination are appropriate when infectious
### Table 3—Summary of vaccination of cats in shelter environments.

<table>
<thead>
<tr>
<th>Vaccine</th>
<th>Kittens (&lt; 16 weeks old)</th>
<th>Adult and adolescent (&gt; 16 weeks old)</th>
<th>Comments</th>
</tr>
</thead>
</table>
| Panleukopenia virus (FPV) | Administer a single dose at the time of admission as early as 4 to 6 weeks of age, then every 2 to 4 weeks until 16 weeks of age if still in the facility. The earlier recommended age (4 weeks) and short end of the interval (2 weeks) should be used in high-risk environments or during outbreaks. | Administer a single dose at the time of admission; repeat in 3 to 4 weeks (or at an interval of no less than 2 weeks) if still in the facility. | Core:  
- MLV preparations are preferable.  
- Usually administered in combination with modified-live FHV-1 and FCV vaccine.  
- Use of FPV vaccines for IN administration is generally not recommended in shelter environments.  
- Postvaccinal sneezing, more commonly seen following IN administration of vaccine, may be impossible to distinguish from active infection. |
| FHV-1 and FCV            | Administer a single dose at the time of admission and as early as 4 to 6 weeks of age, then every 2 to 4 weeks until 16 weeks of age if still in the facility. The earlier recommended age (4 weeks) and short end of the interval (2 weeks) should be used in high-risk environments or during outbreaks. | Administer a single dose at the time of admission; repeat in 3 to 4 weeks (or at an interval of no less than 2 weeks) if still in the facility. | Core:  
- Usually administered in combination with modified-live FPV vaccine except when bivalent FHV-1 and FCV combined vaccines for IN administration are chosen.  
- Use of MLV vaccines for IN administration may be preferable when rapid onset (48 hours) of immunity is important.  
- NOTE: Postvaccinal sneezing, more commonly seen following IN administration of vaccine, may be impossible to distinguish from active infection. |
| Rabies virus             | If the shelter administers Rabies virus vaccine, a single dose should be administered to kittens > 12 weeks of age at the time of discharge from the facility, and the adopters should be advised that a booster vaccination in 1 year is indicated. Long-term shelters or sanctuaries may consider vaccination against rabies at the time of admission. | If the shelter administers Rabies virus vaccine, a single dose should be administered at the time of discharge from the facility, and the adopters should be advised that a booster vaccination in 1 year is indicated. Long-term shelters or sanctuaries may consider vaccination against rabies at the time of admission. | Recommended at discharge:  
- Cats maintained in most indoor shelters are at low risk of infection; therefore, Rabies virus vaccination is not generally recommended at the time of admission.  
- If Rabies virus vaccine is administered, a single dose of either the recombinant or a 1-year Rabies virus vaccine is recommended at the time of discharge; a booster is recommended 1 year later.  
- State or local statutes apply. |
| C felis                  | If used, administer the initial dose at the time of admission and as early as 9 weeks of age; a second dose is administered 3 to 4 weeks later if still in the facility. | If used, administer the initial dose at the time of admission; a second dose is administered 3 to 4 weeks later if still in the facility. | Noncore:  
- Vaccination may be considered as part of a control regime in facilities in which disease caused by C felis infection has been confirmed. |
| B bronchiseptica         | If used, administer a single dose IN at the time of admission. | If used, administer a single dose IN at the time of admission. | Noncore:  
- Vaccination may be considered when cats are likely to be at specific risk of acquiring infection.  
- NOTE: Postvaccinal sneezing or coughing can be impossible to distinguish from active infection. |
| FeLV                     | Not generally recommended | Not generally recommended | Not generally recommended |
| FIV                      | Not generally recommended | Not generally recommended | Not generally recommended |
| G lamblia                | Not generally recommended | Not generally recommended | Not generally recommended |
| FIP (FCoV)               | Not generally recommended | Not generally recommended | Not generally recommended |

*If adult cats were ill or otherwise compromised at the time of initial vaccination, consider repeating the vaccine a single time when the cat is in good health (no sooner than 2 weeks after the initial vaccine). For example, prior to confinement in environments where B bronchiseptica infection is confirmed by culture from an unusually high percentage of cats with URD, where dogs on the same premises have confirmed B bronchiseptica-induced kennel cough, or when characteristic bronchopneumonia is diagnosed by necropsy. Vaccinated animals can shed B bronchiseptica for several weeks and, in some cases, up to a year after vaccination and may spread the organism to other cats and possibly other susceptible species. In facilities where cats are group-housed, such as in some shelters and foster homes, FeLV vaccination is recommended; the protocol recommended for the general cat population should then be followed.  
See Table 2 for remainder of key.
to veterinarians. There are, however, a few states and provinces with reported court decisions addressing the application of the doctrine of informed consent to veterinary practice in some fashion. Additionally, there are a few states and provinces where the veterinary practice act and/or implementing regulations incorporate either the doctrine of informed consent or elements of it, and the American Association of Veterinary State Boards has developed a model practice act that recommends to states the incorporation of the requirement to obtain informed consent by board regulation. However, within the US there remains ongoing debate about whether informed consent law should be applied to veterinary practice. This is not the case with Canada, where the incorporation into veterinary practice is readily accepted, either by regulation or convention. Some within the veterinary community advocate forgoing use of the term “informed consent” for other terms while incorporating risk communication elements in an analogous manner. The intent here is not to advocate for or against the doctrine of informed consent or its particulars. Rather, it is to acknowledge that allegations of a failure to obtain consent or informed consent, historically common in physician medical malpractice litigation, are not uncommon in complaints against veterinarians as well. Therefore, it is prudent to understand the issue and to understand that one of the best deterrents to an informed consent lawsuit (or other legal action for that matter) is effective communication with clients.

Documentation of Consent

Documentation of consent discussions is always helpful if there is ever need to defend a veterinarian’s actions. Such documentation could include a note in the chart that such a discussion took place (with or without co-signature by the client); a note in the chart that in addition to discussion, a specific client handout was given; or use of a consent form signed by the client. Although defense lawyers like more documentation, the task for practitioners is to determine the method that best suits their practice and level of risk tolerance.

Where consent forms are used, the more general the language used, the less helpful the documentation may prove in court; conversely, the more specific the language, the more helpful to the defense of a case. However, the practitioner should have a medically or scientifically defensible basis for making any representations in a consent document. If precise numbers cannot be justified, then more general statements are preferable.

Medical Record Documentation (AAHA Accreditation Standards)

At the time of vaccine administration, the following information should be recorded in the patient’s permanent medical record:

- Vaccines recommended for this patient
- Date of vaccine administration
- Identity (name, initials, or code) of the person administering the vaccine
- Vaccine name, lot or serial number, expiration date, and manufacturer of vaccines actually administered
- Site and route of vaccine administration
- Any concurrent medications/therapy
- Future recommended vaccinations

AEs should be recorded in a manner that will alert all staff members during future visits. Consent should be documented in the medical record to demonstrate that relevant information was provided to the client and that the client authorized the procedure.

Part II: Vaccination of Shelter-Housed Dogs

The AAHA Canine Vaccination Task Force developed vaccination guidelines to facilitate the efforts of individuals responsible for purchasing vaccines, administering vaccines, and/or developing vaccination policy for shelter-housed dogs. The objective of writing vaccination guidelines for shelter-housed dogs is to provide essential recommendations to reduce, or eliminate when possible, the risk of infectious disease outbreak or illness in shelter animals. The Task Force recognizes that unique staffing and cost constraints may preclude the ability of all animal shelters to implement these Guidelines fully. However, the guidance provided in this section is intended to provide a basis for developing and implementing a rational vaccination program for animal shelters because these dogs are at particularly high risk of exposure to infectious disease.

The time and effort dedicated to controlling infectious diseases among shelter-housed dogs is only one of many variables in the complex shelter medicine and husbandry equation. The recommendations provided here attempt to address shelter-unique issues as they pertain to rational selection and use of vaccines. Other important factors, such as population density, ventilation, sanitation, staff training, etc., must be taken into consideration when implementing an infectious disease control plan.

Definition of a Shelter Environment

As used in the context of the Canine Vaccination Guidelines, an animal shelter is a holding facility for homeless animals, usually awaiting adoption, rescue, or reclaim by owners. In general, animal shelters are predominantly characterized as a random source population of dogs, as well as other animal species with a largely unknown health and vaccine history, high population turnover,
and significant potential for relatively high levels of infectious disease risk.

Within this broad definition, however, there is wide variation. The term “shelter” encompasses situations ranging from sanctuaries that possess a stable population to facilities that admit dozens or even hundreds of animals per day to rescue and foster homes that care for multiple litters or individuals at any given time. As the appropriate vaccine strategy varies with each individual pet, there is no one-size-fits-all strategy for vaccinating shelter animals. Shelters should interpret these Guidelines in light of the infectious disease risk and turnover rate within their own populations.

Special Considerations of a Shelter Vaccination Program

The relatively high likelihood of disease exposure in most shelters and the potentially devastating consequences of infection necessitate a clearly defined shelter vaccination program with exacting requirements. It is necessary to define not only what vaccines are appropriate, but also when vaccines should be administered with respect to shelter entry, which animals are candidates for vaccination, and how and by whom vaccines should be administered, including record keeping and documentation of AEs. For vaccines that offer significant protection against common and severe infectious diseases, the appropriate vaccination program may be one that is more aggressive than is generally indicated in private practice. Such a program may include, for example, vaccinating dogs at the short end of the suggested intervals or at a relatively early age.

With the use of vaccines at shorter intervals or in an expanded population, it is also important to minimize the vaccines given to those that are clearly indicated by the immediate and significant disease risks. Vaccines are often administered to stray dogs not legally belonging to the shelter and may be given by lay staff under indirect veterinary supervision. These considerations make it even more crucial to develop a vaccine program that minimizes the risk of vaccine-induced adverse reactions. Furthermore, cost differences that are trivial for one individual become significant when multiplied by thousands of doses. Therefore, only those vaccines that demonstrate a clear benefit against common and significant shelter diseases should be used. Adopters should be encouraged to discuss an individually tailored vaccination program with their own veterinarian after adoption.

Vaccination Guidelines for Shelters

Core Vaccines for Shelter-Housed Dogs

Vaccines for shelter use are categorized for pet dogs, as core and noncore (optional) (Table 2). A number of other vaccines discussed in the following are not recommended. Although the Task Force acknowledges that variable shelter circumstances make it impractical to provide universally applicable recommendations, those vaccines categorized as core are essential vaccines that should be administered to all dogs at the time of entry (CDV, CPV-2, CAV-2, IN Bb + CPiV) or at the time of release (RV).51,74–77

It is recommended that all dogs be vaccinated for rabies before release from a shelter. If a long-term stay is anticipated or for shelters where virtually all dogs will be adopted, rabies vaccine should be administered on intake with the other core vaccines. The earliest age at which rabies vaccine should be given is 12 wk, and it is recommended that it be given at a site on the body different than where the CDV, CPV-2, CAV-2 vaccines are administered. At open-intake shelters, rabies vaccine should be administered at the time of release. Although ideally vaccines should be given at least 2 wk apart to avoid vaccine interference, the public health benefit of ensuring rabies vaccination before release is considered to outweigh the small risk of interference in this case. If state or local requirements prevent issuance of a rabies certificate for vaccines administered at the shelter (e.g., due to lack of veterinary supervision), vaccination for the purpose of legal recognition and licensing should be repeated at the owner’s veterinarian 2–4 wk later. Unless a certificate documenting previous rabies vaccination is available, it should be assumed that previous vaccination has not been received, and revaccination 1 yr later will be required.69

Noncore Vaccines for Shelter-Housed Dogs

The CIV vaccine may be recommended (noncore) in selected shelters located within endemic communities or in shelters that transport dogs to or from communities considered to be endemic for canine influenza. This is a killed vaccine that requires two doses be given at least 2 wk apart. Immunity is expected 1 wk after the second dose. Therefore, even in shelters located within endemic communities, the benefit of this vaccine will be limited if exposure cannot be prevented before onset of protection or in dogs unlikely to stay long enough to receive the full series of vaccines.78–79

Vaccines Not Recommended for Use in the Shelter Environment

The vaccines listed in the not recommended category are for diseases that do not represent a significant threat to the population of dogs residing in shelters, would not provide protection because there is inadequate time for immunity to develop, or that have limited efficacy against clinical disease. Among the various canine vaccines licensed for use within the US, the following vaccines are not recommended for routine use in shelter-housed dogs:
immunizations while in the care of the shelter. All medical information should be provided in written form with the animal at the time of transfer or adoption.

2. Considerations on Intake
Each animal’s individual health status should be evaluated and monitored beginning at intake and regularly thereafter (AAFP 2004; UC Davis 2009). This allows any problems or changes that develop during an animal’s stay to be recognized, distinguished from pre-existing conditions, and addressed.

A medical history, if available, should be obtained from the owner at the time of surrender. Any available information should be solicited when stray animals are impounded as well. Ideally, this information should be obtained by interview, although written questionnaires are acceptable. Each animal should receive a health evaluation at intake to check for signs of infectious disease and/or problems that require immediate attention (UC Davis 2009). Intake evaluations should be documented in the medical record. Every attempt should be made to locate an animal’s owner, including careful screening for identification and microchips at the time of intake. Intake health evaluation should therefore include scanning multiple times for a microchip using a universal scanner. Research has shown that the likelihood of detecting microchips increases with repeating the scan procedure multiple times (Lord 2008). (See subsections below for information on vaccination and other intake treatments.)

Separation of animals entering shelters is essential for proper maintenance of health and welfare. Beginning at intake, animals should be separated by species and age as well as by their physical and behavioral health status. Young animals (puppies and kittens under 20 weeks [5 months] of age) are more susceptible to disease and so should be provided with greater protection from possible exposure, which can be more easily accomplished when they are separated from the general population. Starting from the time of intake and continuing throughout their stay, healthy animals should not be housed or handled with animals who have signs of illness. (See section on Behavioral Health and Well-being for more information on intake procedures.)

3. Vaccinations
Vaccines are vital lifesaving tools that must be used as part of a preventive shelter healthcare program. Vaccination protocols used for individual pets in homes are not adequate in most population settings. Strategies must be specifically tailored for shelters because of the higher likelihood of exposure to infectious disease, the likelihood that many animals entering the shelter are not immune (Fischer 2007) and the potentially life-threatening consequences of infection. Some vaccines prevent infection whereas others lessen the severity of clinical signs (Peterson 2008). Panels of experts (AAFP 2006; AAHA 2006) agree that protocols must be customized for each facility, recognizing that no universal protocol will apply to every shelter situation.

Guiding principles for core vaccination in shelters, that are generally applicable to most shelters, are available (AAFP 2009; AAHA 2006). Within this framework, specific vaccination protocols should be tailored for each program with the supervision of a veterinarian, taking into consideration risks and benefits of the vaccines, diseases endemic to the area, potential for exposure, and available resources (Miller & Hurley 2004; Miller & Zawistowski 2004).

Because risk of disease exposure is often high in shelters, animals must be vaccinated at or prior to intake with core vaccines. Pregnancy and mild illness are not contraindications to administering core vaccines in most shelter settings because the risk from virulent pathogens in an unvaccinated animal would be far greater than the relatively low risk of problems posed by vaccination (AAFP 2009; AAHA 2006; Larson 2009). Core vaccines for shelters currently include feline viral rhinotracheitis, calicivirus, panleukopenia (FVRCP) for cats (AAFP 2006)
Exhibit G

Manatee County Animal Services
Shelter Operation Procedures
Purpose

The purpose of this policy is to establish the procedures for the shelter operation of the Animal Services Division.

Procedures

The animal services shelter shall be responsible for the maintenance and operation of the animal shelter and for the care of all impounded animals. This will include cleaning animal cages, feeding animals, caring for and providing treatment to sick and injured animals, euthanasia, and disposal of deceased animals and any other duty as needed.

Dress Code:

Animal Services Shelter Staff are expected to report for duty promptly at the assigned starting time in the designated uniform. Civilian clothes are not to be mixed with the prescribed uniform, unless on days specified by supervision. All staff shall be neat and clean in appearance to produce a positive public image. If applicable, facial hair shall be neatly trimmed or shall be clean shaven. Uniform inspections may be performed daily, if a uniform is unsatisfactory, the employee may be sent home to correct the problem.

Scheduling:

Animal Services shelter staff will work 5, 8 hour days on a rotating schedule. There will be three rotating shifts as follows for the Palmetto shelter: Monday-Friday 8am to 5pm and Tuesday-Saturday 8am to 5pm. The downtown adoption center will have the hours of Tue-Friday 9:30am to 6:30pm. Sunday and Holidays will be covered on a scheduled rotating basis. The schedule may be amended at any time to better reflect the needs of the division.

Shelter staff will begin duties at 8am and will be completed at 5pm when scheduled in Palmetto, and will begin duties at 9:30am and will be completed at 6:30pm. Lunch breaks in Palmetto will be between 11am-12pm and between 12pm-1pm, unless otherwise cleared by the supervisor. Staff is allotted one hour for lunch break unless otherwise notified an Animal Services Supervisor.

Should staff not receive a full hour for lunch break, or should it be necessary to work past an 8 hour day, the staff will be compensated with comp time or overtime at the Supervisors discretion. Staff will receive their daily duties from their supervisor. Such assignments will be posted prior to the beginning of each day’s shift. In the absence of the Animal Services Supervisor, it will be the responsibility of a senior staff or supervisor designee to assign daily duties.
Shelter personnel assigned Sunday and holiday duty shall ensure that all sheltered animals are cleaned and fed. All medications shall be administered by the designated lead person on all days that the Veterinary Technician is not scheduled to work. Sunday duty shall be from 0800 to 1700 and Holiday duty shall be from 0800-1100 hours. Any deviations from these hours must have prior approval by a Supervisor. Inability to stand assigned duty shall be reported to a Supervisor in a timely manner. The assigned lead person is responsible for security in all shelter buildings and the main gate of the Animal Services Complex. Any unusual or suspicious event that may be noted during Sundays or holidays shall be reported to management in a timely manner. Civilians, family members or other unauthorized personnel are not to be admitted to the Animal Services facility after hours, on Sundays, or on Holidays.

**Vet Tech Responsibilities:**

The animal services vet tech shall be responsible for intake vaccines, intake exams, medical documentation, testing and evaluating, medicating, and treating animals for medical conditions. The vet tech may also be charged with behavior evaluations when the supervisor deems it necessary. The vet tech will maintain control of all medical supplies, medications, and equipment. The vet tech will follow medical protocols set forth by the contracted medical director. The vet tech will maintain communication with the contracted vet/medical director and relay all information to shelter supervisor when protocols are updated or changed. Vet tech schedule will be Monday – Friday 8am to 5pm unless otherwise directed. The vet tech shall maintain documentation of all medical procedures or medicines of animals that are treated while at animal services. The vet tech will be responsible for accuracy of the daily vet routines and appropriate paperwork. This will include assisting animal services officers in loading the animals for transport to the vet for services. When vet tech is not available a shelter staff may be directed to assist in above mentioned duties.

**Equipment:**

Each shelter staff will be assigned a portable hand held radio and charger. The radio and charger will remain in the kennel office of the shelter unless in use during the business day. Each day when the shelter becomes open to the public, all shelter staff must have their radios on and with them. At the end of the shift each radio should be powered off and returned to its charging station. Radios and batteries shall be kept in operational condition and all problems shall be reported to a Supervisor in a timely manner.

**Customers:**

Staff will assist customers who enter the shelter to look for lost pets, who are looking to adopt, and who are there to make a complaint about an animal related problem. Good public relations shall be maintained by staff at all times. Any heated confrontations with citizens, swearing or other forms of objectionable behavior by staff will not be tolerated. Threatening or potentially volatile situations shall be reported to a Supervisor immediately. When necessary, intervention by a law enforcement agency shall be requested.

**Reporting Customer Interaction:**

Staff shall document all customer information and interest in the form of a memo on an animal. Such information will be generated in the Animal Memo Notes in the Chameleon Software program that Animal Services utilizes. All documented fields in the report will be complete and accurate. It is the responsibility of the staff that interacts with the customer to obtain all pertinent information required and to document the information. For each instance, the staff will document his/her actions in a MEMO/NOTES field in the Chameleon software program provided. These NOTES shall include the date of action, the person whom is interested or gave information along with their contact information and the status or outcome of the interaction, and the initials or name of the staff who is documenting.
Reporting Injury:

All staff shall immediately report any animal bite or injury obtained while working on the job or any bite or injury to a non-employee such as a customer or a volunteer. All incidents should be documented in an incident report through a supervisor. If a supervisor is not on site or available staff must call a supervisor to report the incident. A bite report must be filed for any bite or scratch from an animal that breaks the skin.

Animal Handling:

All animals must be handled in a safe and humane manner for both the animal and the handler. Any staff failing to properly handle animals will be subject to disciplinary action. Staff must be proficient in the safe and humane handling of domestic dogs and cats as well as wildlife.

Equipment:

All staff must become proficient in the use of animal related equipment including but not limited to: holding cages, slip leads, catch poles (control sticks), syringe poles, incinerator, snappy snares, water hoses, brooms, scrub brushes, pressure washers, squeegees, etc.

Euthanasia:

All shelter staff must possess certification through the state of Florida as a euthanasia technician, and will be required to perform animal euthanasia when necessary. If staff is not certified at time of hire they will be sent to the next available class to become certified and will not perform any euthanasia until certification is complete. Un-certified staff will still be responsible for assisting in holding animals for and bringing animals to the technician to be euthanatized.
Exhibit H

American Animal Hospital Association
Canine Vaccination Guidelines (2011)
against CAV-2, a virus that causes and contributes to canine infectious respiratory disease complex.  

**Vaccine Stability**

Because antigenic virus/bacteria in infectious vaccines is live, these products often inherently lack thermostability.  

To extend the stability of infectious vaccines during shipment and storage and to sustain vaccine efficacy, manufacturers typically prepare and sell infectious vaccines in a lyophilized (freeze-dried) state. Dehydrating the product into a “cake” significantly extends the shelf-life of perishable infectious vaccine antigens. Once diluent is added to the lyophilized product, the vaccine antigens quickly regain instability and may lose efficacy over time. Stability after reconstitution can vary among the various vaccine antigens in combination (multivalent) products (e.g., modified live virus [MLV] CDV + CPV-2 + CAV-2). It is recommended that infectious vaccines, after reconstitution, be administered within 1 hr. Reconstituted vaccine that is not administered within 1 hr should be discarded.

Once rehydrated, infectious vaccines are highly susceptible to chemical inactivation. For this reason, it is generally not recommended to cleanse the skin with alcohol before inoculation. Furthermore, syringes should never be washed and reused. Chemical residues in the syringe can easily inactivate the infectious vaccines. Infectious vaccines should be administered before the expiration date printed on the vial, as infectivity is lost over time.

It is important not to mix noninfectious vaccines with infectious vaccines in the same syringe, unless specified by the manufacturer, and even then, there may be advantages to administering a noninfectious vaccine in a different site on the animal from the infectious vaccine’s administration site.

**Multiple Dose Vials**

Infectious vaccines licensed for use in dogs are not commonly sold in multiple dose (also called “tank”) vials. For the same reasons outlined previously for noninfectious vaccines, use of multiple dose vials of infectious (parvovirus) vaccine is not generally recommended.

**Routes of Administration**

Infectious vaccines contain avirulent live virus or bacteria that are capable of infecting cells in much the same manner as the virulent virus or bacteria does during natural infection. Therefore, infectious vaccines may be administered by the IN route (e.g., Bb + canine parainfluenza virus [CPIV]) as well as by the parenteral route (SQ or IM). Vaccines intended for IN administration must never be administered parenterally. Furthermore, IN vaccines administered orally are quickly inactivated and will not immunize.

**Initial Vaccination**

One dose of infectious vaccine will prime, immunize, and boost the immune response, provided the MDA does not interfere with the vaccine antigen (virus or bacteria). Because it is not practical to establish the level of maternal antibody in every puppy presented for initial vaccination, it is recommended that puppies receive doses of infectious vaccine (e.g., CDV + CPV-2 + CAV-2) every 3–4 wk between 8 and 16 wk of age. The final dose administered at 14–16 wk of age should insure the puppy will receive at least one dose of vaccine at an age when the level of MDA is insufficient to prevent active (vaccine-induced) immunity. Administration of infectious vaccine to dogs <6 wk of age, even in the absence of MDA, is not recommended.

Because dogs older than 14–16 wk of age are not likely to have interfering levels of MDA, administration of a single initial dose of an infectious vaccine to an adult dog can be expected to induce a protective immune response. The administration of a single, initial dose of infectious vaccine to dogs >16 wk of age is considered protective and acceptable (Table 1). It is common practice, however, in the US and Canada, to administer two initial doses, 2 to 4 weeks apart, to adult dogs without a history of prior vaccination.

**Minimum Age at the Time of Initial Vaccination**

In practice, predicting the exact age at which a puppy will first respond to administration of an infectious vaccine is difficult. MDA is the most common reason early vaccination fails to immunize. Puppies that received colostrum from an immunized dam might not respond to vaccination until 12 wk of age. In contrast, orphan puppies and puppies that were denied colostrum might respond to initial vaccination much earlier. The minimum age recommended for initial vaccination with an infectious (core) vaccine is 6 wk. Even in the absence of MDA, administration of an infectious vaccine to any dog <6 wk of age may result in a suboptimal immune response due to age-related immunologic incompetency. In contrast, administration of an infectious vaccine labeled for IN administration (e.g., IN Bb + parainfluenza virus) may induce a protective, local (mucosal) immune response as early as 3–4 wk of age. MDA does not interfere with local immunity.

**Immunization in the Presence of Maternally Derived Antibody**

In general, MDA is more effective at interfering with infectious vaccines than noninfectious vaccines. Various mechanisms have been suggested, including rapid neutralization of infectious vaccine...