



Angelina “Angel” Colonnese

CLERK OF THE CIRCUIT COURT AND COMPTROLLER OF MANATEE COUNTY

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MEMORANDUM

To: Robert Smith, Public Safety Department Director

From: Angelina “Angel” Colonnese, Clerk of the Circuit Court and Comptroller

Date: May 25, 2018

Subject: Animal Services Investigation Follow-up

The Internal Audit Department has completed an investigative follow-up to the Public Safety Department Animal Services Division Complaint Report issued March 31, 2016. The objective of our follow-up was to review and test areas identified in the original investigation where improvements were needed, and to ensure that appropriate corrective actions have been implemented. The scope of our follow-up testing included the six-month period ending March 31, 2017.

In our original investigative review, we found that employee work hours had not been correctly reported on timesheets, and animal intake vaccinations were not always administered timely. Several recommendations were made to improve the Division’s timekeeping and vaccination procedures. These included the following:

- Consider implementation of a time tracking system to ensure employees accurately account for their work time;
- Require employees to submit leave requests through WorkForce for proper approval and documentation;
- Ensure accurate work time is recorded on timesheets, including hours worked when trading shifts or flexing work time;
- Adhere to County policies for reporting standby time and call outs;
- Evaluate and update animal intake protocols to improve the time with which animals are vaccinated; and
- Update the Division’s Standard Operating Procedures (SOP) to require timely disposal of reconstituted vaccines, if not used.

We are pleased with the corrective actions taken by the Animal Services Division since the original investigation. Our testing identified improvements in the following areas:

Recording Hours in WorkForce

In the original investigation we found that some employees relied heavily on supervisors to enter their leave time on timesheets. This appears to have led to some of the time recording errors identified. Management has since issued a memorandum requiring all leave to be requested and approved through the

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WorkForce system; exceptions are made in certain circumstances, such as sick time or FMLA, where a supervisor may enter the leave.

Our follow-up testing found 90% compliance with the new policies.

Reporting Call Outs and Standby Time

In the original investigation we found that Animal Control Officers did not always record standby and call out hours according to County policies. Management subsequently issued memorandums to staff to provide additional clarification and guidance.

Our follow-up testing found that all of the call outs and standby hours reported during the testing period were properly recorded and supported.

Intake Vaccination Procedures

In the original investigation we found that vaccinations were not always given to animals immediately upon entering the shelter, as industry standards recommend, and as stipulated in the Animal Services SOP. On average, animals were vaccinated within 36 hours of intake; 50% were vaccinated within 24 hours, and 74% within 48 hours. Management has since updated its SOP to require that vaccinations be given “as soon as possible after the animal arrives.”

Our follow-up testing found that improvements have been made in vaccination times. On average, animals were vaccinated within 33 hours of entering the facility; 67% were vaccinated within 24 hours, and 76% within 48 hours. Subsequent to our testing, Management has also assigned additional staff to ensure that intake vaccinations are performed 7 days per week; this should further improve the timeliness with which the vaccinations are given.

In the original investigation we also found that while the Veterinary Services staff had updated its practices to ensure timely disposal (within one hour of mixing) of unused, reconstituted (drawn up/mixed) vaccines, the Division’s policies had not been updated to specifically reflect the one-hour time limit.

Management has since updated the Division’s Intake Examinations/Vaccinations Procedure (13.4.06) to require disposal of unused reconstituted vaccines within one hour of mixing.

The follow-up testing did identify areas which still require Management's attention. During the exit meeting on May 7, 2018, your Management staff, together with the Internal Audit Department, discussed the areas where further improvements are needed.

Tracking, Reporting, and Monitoring Time

In the original investigation we found a number of instances where Animal Services employees had incorrectly reported work hours on their timesheets. In some instances the work hours appeared to have been overstated, while in other instances the hours appeared to have been "flexed" from one day to the next without being properly recorded on the timesheets. However, due to a lack of supporting documentation and definitive, comparative data, we were unable to determine the extent of any possible over/under-compensation to the employees.

In response, Management issued a memorandum to its employees requiring staff to enter the facility each day through the administrative wing and swipe their respective employee badge (key card) before entering the building. Upon completion of a shift, each staff member was required to exit through the administrative wing and swipe their badge. We tested all 30 of the Division's employees for compliance with this policy by comparing the days worked, as recorded in WorkForce, to the key card swipes each day (2,586 days). We further evaluated the accuracy of the reported hours on a weekly basis, allowing for a variance of +/- 2.5% (1 hour of a 40 hour workweek). Our testing identified the following:

- Of the 498 weeks tested, 245 (49%) had reportable differences between the hours recorded in WorkForce and the corresponding key card swipe hours. More than half of these differences (142 weeks) represented weeks in which an employee's swipe hours were greater than the hours recorded in WorkForce (potential underpayment of wages). Conversely, 103 weeks had swipe hours which were less than the hours recorded in WorkForce (potential overpayment of wages). However, due to a lack of other corroborating data or supporting documentation (see Records Retention Finding on page 4), we were unable to determine the extent of any possible over/under-compensation to employees.
- 12 days were identified where a full work day was recorded on an employee's WorkForce timesheet, but the employee had no key card swipe activity, or other evidence of working that day. According to staff, it is possible that they may have been working off-site on those days or simply forgot their employee badge; however there was no other corroborating data or documentation (see Records Retention Finding on page 4) to support this.
- Instances were identified where employees were paid for more holidays than what was allowed. According to the County's Holiday Pay Procedures, employees were entitled to 2 paid holidays for Christmas and 1 paid holiday for New Year's. We found where an employee was paid for 5 holidays during this time, and another was paid for 4. This resulted in 3 days of overcompensation to the employees. (Both employees no longer work for the County.)

Records Retention (new finding)

During our follow-up testing, we found that supporting documents, such as shelter staff work schedules and desk calendars have not been retained by the Division, as required by State record retention schedules. According to management, these records are used to provide checks and balances when approving employee timesheets, and are discarded at the end of each month. In the original investigation, these documents *were* retained by the Division, and used by auditors as support to verify the work hours reported on timesheets. Subsequent to that investigation, management decided to no longer maintain these records. According to the County's Records Division Manager, these documents would be considered "attendance and leave records," and as such, must be retained for 3 fiscal years, in accordance with the State of Florida General Records Schedule GS1-SL For State and Local Government Agencies (Attendance and Leave Records-Item #116).

Based on the results of our testing, and subsequent to our analysis, Management has revised the Division's Time Keeping procedure (7.2) and no longer requires employees to swipe in and out each day for time tracking purposes. According to the policy, employees are now required to check in with their respective supervisors at the start of each day; this will be documented by supervisors on a standard form. This new policy also requires supervisors approving time off requests to place this information on an appropriate Outlook Calendar for tracking and scheduling purposes. According to management, the Division's Administrative Specialist will audit the time keeping each month as a cross check to ensure the procedures are being followed as accurately as possible.

In addition, Management will immediately begin retaining all records related to leave and attendance for a minimum of 3 years, to ensure compliance with the State records retention requirements.

We would further recommend that Management consult with County Administration, the County Attorney's Office, and/or the Human Resources Department to determine whether any action should be taken regarding staff's unsupported work days (12 days), or whether to pursue repayment of the extra Holiday pay received by former employees (3 days).

We would like to thank you and your staff for the attention given to the findings identified in the original investigation, and for the assistance given to the Internal Audit staff.

AMC/LJS/GR

cc: Board of County Commissioners
Ed Hunzeker, County Administrator
Dan Schlandt, Deputy County Administrator
Cheri Coryea, Deputy County Administrator
Mitchell Palmer, County Attorney
Dan Wolfson, Chief Financial Officer, Clerk of the Circuit Court