



OFFICE OF THE COMPTROLLER  
CITY OF ST. LOUIS



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July 28, 2015

Melba R. Moore, MS, CPHA, Acting Director/Commissioner of Health  
Department of Health  
Animal Care & Control  
1520 Market Street, Suite 4351  
St. Louis, MO 63130

RE: Animal Care & Control (Project #2015-PR02)

Dear Ms. Moore:

Internal Audit has completed a review of Animal Care & Control. Enclosed is the report of our review covering the period July 1, 2013 through June 30, 2014. A description of the scope of the work is included in the report.

Fieldwork was completed on March 16, 2015. Management responses to the observations and recommendations noted in this report were received on July 21, 2015 and have been incorporated in the report.

This review was made under authorization contained in Section 2, Article XV of the Charter, City of St. Louis, as revised; and has been conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*.

If you have any questions, please contact the Internal Audit Section at (314) 657-3490.

Respectfully,

Mohammad H. Adil, CPA, CGMA  
Internal Audit Supervisor

Enclosure

CC: Jeanine Arrighi, Health Program Manager II  
Diedra Weaver, Health Program Manager  
Sarah Frei, City Veterinarian



# CITY OF ST. LOUIS

**DEPARTMENT OF HEALTH**

**ANIMAL CARE & CONTROL**

**PROCESS REVIEW**

**JULY 1, 2013 THROUGH JUNE 30, 2014**

**INTERNAL AUDIT PROJECT #2015-PR02**

**DATE ISSUED: JULY 28, 2015**

**Prepared By:  
The Internal Audit Section**



# CITY OF ST. LOUIS

**HONORABLE DARLENE GREEN, COMPTROLLER**

**CITY OF ST. LOUIS  
DEPARTMENT OF HEALTH  
ANIMAL CARE & CONTROL  
PROCESS REVIEW  
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**SUMMARY**

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**Background**

Animal Care & Control (ACC) is a division of the Health Department. ACC is responsible for the enforcement of animal related City of St. Louis ordinances. It provides rabies registration, licensing services, and outreach and education service regarding pet safety and ownership. ACC also operates an Animal Shelter and adoption program for stray and rescued animals.

**Purpose**

The purpose of this review was to determine if ACC effectively and efficiently managed risks to ensure:

- Compliance with applicable laws, regulations, policies and procedures.
- Safeguarding of assets.
- Reliability and integrity of financial and operational information.
- Economic and efficient use of resources.

**Scope and Methodology**

The scope of the review covered the period July 1, 2013 through June 30, 2014. The review was confined to evaluating internal controls related to the objectives noted above. The review procedures included:

- Inquiries of management and staff.
- Analytical review of financial performance.
- Observations of relevant processes.
- Reviews of processes and transactions for compliance with applicable laws, regulations, policies and procedures.
- Limited tests of internal controls and related transactions.
- Comparison of processes against best practices.
- Follow-ups on any prior observations.
- Other procedures as considered necessary.

**Conclusion**

The ACC could do more to effectively and efficiently manage risks within its operations.

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**SUMMARY**

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**Current Observations**

We noted the following observations and opportunities for improvement:

1. Service Call Priority Protocol
2. Handling of Surrender Receipts
3. Compliance with Procurement Procedures
4. Safety of ACC Officers
5. Animal Intake Safety

These observations are discussed in more detail in the *Detailed Observations and Recommendations* section of this report.

**Management Response**

An exit conference was conducted with ACC on July 20, 2015. In attendance from ACC were:

- Melba R. Moore, MS, CPHA, Acting Director/Commissioner of Health
- Jeanine Arrighi, Health Program Manager II
- Diedra Weaver, Health Program Manager
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- Jill Speicher, ACC Supervisor
- Sarah Frei, City Veterinarian
- Joan McCray, Fiscal Operations

Internal Audit was represented by:

- Mohammad Adil, Internal Audit Supervisor
- Abdullahi Abdi, Auditor

The report observations and recommendations were discussed in detail at the exit conference.

Management of ACC subsequently provided written responses to the Internal Audit on July 21, 2015, which have been incorporated in this report.

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**DETAILED OBSERVATIONS AND RECOMMENDATIONS**

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**1. Service Call Priority Protocol**

ACC uses a formalized written “Prioritizing Request for Service Protocol” in the dispatch of ACC officers when a service call is received either by ACC or the Citizen Service Bureau (CSB). Dispatch of an ACC officer is prioritized into a four tiered protocol depending upon the severity of the reported incident as follows:

- Priority 1 – ACC Officer dispatched immediately.
- Priority 2 – ACC Officer dispatched as soon as possible by possibly de-prioritizing any activity of lower priority level.
- Priority 3 – ACC Officer dispatched within 1 hour or responds same day.
- Priority 4 – ACC Officer dispatched within projected completion timeframe.

In an analysis of CSB service requests from January 2014 to June 2014, we noted that the service request priority protocol used by CSB’s CityWorks software did not align with the ACC’s four tiered service call protocol. All service calls with different priorities were coded as either priority one (1) or priority four (4) calls. In fact out of 582 service calls received, 573 (99.5) calls were coded as priority 4 calls and the remaining nine (9) were coded as priority one (1) calls.

Management was aware of the service call prioritization inconsistencies between ACC and CSB, and attributed them to the revision of the ACC written call prioritization over the years.

Lack of prioritization consistency may cause poor response time and service quality resulting in a heightened threat to the safety and well-being of humans and animals.

**Recommendation**

Internal Audit recommends that ACC rectify the inconsistency and periodically monitor to ensure their service call prioritization protocol is aligned with CSB-CityWorks software priority protocol.

***Management Response***

*The priority level set at CSB is, to our understanding, a level set for internal use at CSB, and has no correlation to the dispatching priority levels set by ACC for ACC use, nor does ACC have control over the use of CSB's internal processes. It is understandable that having two "priority levels," with both sets using numbers may cause confusion. The Department of Health will adjust the terminology in our dispatching protocol to A, B, C, D or Immediate, Escalated, Same Day, Normal or*

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*something similar, just not numbers. This protocol is adjusted depending upon shelter status, and can be changed from week to week depending upon current shelter capacity. We can put this in place immediately. We will schedule another meeting with CSB by August 3, 2015 to address this and other animal control feedback we are receiving from the TNR Task Force.*

**2. Handling of Surrender Receipts**

The Animal Shelter charges a surrender fee to pet owners who surrender their pets to the Shelter. When payment is received, a sequentially numbered receipt is provided to the pet owner.

All surrender transactions should be recorded in the Receipts Log book. At the end of the day funds collected should be reconciled to the Receipts Log book and deposited in a locked transport bag and transported over to ACC Administrative Office.

However, we noted that a reconciliation was not performed of the surrender fees to the Receipts Log book and the monies transported to the Administrative Office as follows:

- The receipt number was not recorded in the Receipts Log book.
- No log was maintained of the monies deposited into the transport bag.

It is critical to maintain accurate record keeping to prevent or detect potential misappropriation. By not recording the receipt number in the Receipt Log book or logging deposits, it is difficult to properly reconcile to ensure all receipts have been properly recorded, accounted for and deposited.

**Recommendation**

Internal Audit recommends that management establish and implement a policy requiring the documenting of the receipt number in the Receipt Log Book and the logging of deposits.

***Management Response***

*Since 3/5/15 we have been in full compliance with the Shelter Transactions and Deposits Protocol. Part of the problem was a duplicate receipt book that has since been replaced with a triplicate receipt book, so now the white copy goes with the customer, the yellow copy goes with the deposit, and the pink copy stays in the receipt*

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*book. The issue of documenting the receipt number and logging the deposits was resolved by adding a column in the log book for receipt number and courier initials (for cash bag pick-up). The courier will also initial a logbook at 1520 Market Street upon delivery.*

**3. Compliance with Procurement Procedures**

The Animal Shelter did not comply with ACC's documented procurement procedures for receiving supplies. In our review of the Shelter's procurement procedures, we noted:

- The Shelter did not have a Departmental "Supply Log Book" for receiving packages.
- The packing slips were not signed and dated by the receiving person as written confirmation of review of the items received.
- The packing slips were not noted with "matched or did not match" with purchase order and requisition form".
- The requisition and purchase orders, packing slips, and invoices were not all provided to the City Veterinarian for payment approval.

The City Veterinarian was not aware of the written policy and procedures in place by ACC for the purchasing of supplies.

Not following written policies and procedures increases the risk that supplies may be misappropriated.

**Recommendation**

Internal Audit recommends that the ACC management:

- Provide documented policies and procedures to applicable personnel.
- Train applicable personnel on policies and procedures.
- Periodically monitor to ensure policies and procedures are followed.

***Management Response***

*The missing procedure is now in place: employees are saving packing slips and checking off that the items were received and writing "matches PO" on the packing slip. The "package log book" is contained in the shelter's fiscal binder. The*

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*Procedure for Supplies Received and Payment Processing document is available to all employees at the shelter and all are in compliance with it. Purchasing has been centralized through the Environmental Health Services Manager.*

**4. Safety of ACC Officers**

Based on interviews and a ride-along with an ACC Officer, we noted concerns related to the safety. ACC Officers do not appear to have adequate protection from property owners or animals.

The National Animal Care & Control Association's Personnel Training and Safety Guidelines state that animal care and control personnel should be offered adequate protective gear that provides protection from dangers and threats to their personal safety that they may encounter in their daily duties. Among others, adequate protective gear consists of portable radios, bite sticks, chemical deterrent spray and ballistic vests.

**Recommendation**

Internal Audit recommends that ACC management follow the National Animal Care & Control Association's Personnel Training and Safety Guidelines by providing ACC officers with:

- Bullet proof vests and body armor
- Non-lethal chemical deterrent such as pepper spray.

**Management Response**

*We support issuing protective equipment to the ACCOs and will go about a series of steps prior to doing so.*

**a. Policies**

*Management will finalize policies that address whether or not wearing bullet proof vests is required and if it is required at all times. (e.g.: Would it be required whenever the ACCO is on duty and in the field, or only at night? Would it be left to the ACCO's judgement?) Before issuing pepper spray and collapsible batons we will conduct further research with a City Counselor to determine whether MO statutes or City ordinances regulate the use of either and whether current City policy allows employees to*

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*carry them. (e.g.: If the equipment is issued by the City, does that override the City policy against carrying weapons on duty? If ACCOs can have it, should the rest of Environmental Health have it?)*  
*A very clear standard operating procedure will be in place that determines under what circumstances an officer can deploy the pepper spray or collapsible baton against an animal or person. A policy will be finalized including the repercussions for misuse of the equipment as well. When drafting these protocols and procedures, we will request input from the City Counselor's office who will be tasked with defending the City and the employee against potential lawsuits brought by the people impacted by the use of the equipment. Law enforcement should be consulted to explore the risk of an employee being arrested for using them.*

**b. Training:**

*Anyone who is issued body armor will be provided training in its proper use and care to ensure its effectiveness and longevity. To minimize misuse, accident, and liability, all employees who will carry pepper spray and collapsible batons will be trained in their appropriate use. Animals and people can be seriously injured or killed by these tools, so proper training and proper accountability are vital in order to minimize misuse. We will reach out to the Carpenters' Union, the St. Louis Metropolitan Police Department, and the National Animal Care and Control Association (NACA) to identify such training opportunities. Managers and Supervisors will attend workshops and conferences provided by industry best practice leaders, such as NACA.*

**c. Perception**

*It is important to consider the impact on perception and the community this change in visual appearance and our approach to animals and people this will have. We will work with public information officers to identify communications to the public regarding these changes.*

**d. Budget**

*This change will require budgetary requests or adjustments. We will research costs for this equipment and make necessary adjustments in budgets to accommodate these additional costs (e.g., ballistic vests can cost over \$1000 each). Training and materials for other protective*

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*equipment will be part of this research. Training and instructions will be in place not only for proper use, effectiveness, and longevity, but also to portray a realistic view of the capabilities and limitations these new tools offer. Expenses will include both travel and registration. All budgetary decisions will be established based upon the research of the State Statute and City Counselor opinion.*

***Plan of Action***

*We will research the costs of the equipment and the training, along with policy development and public information over the next three months to determine if it is feasible to make these changes during this fiscal year, or whether these requests would be phased in and requested in FY2017 budgets.*

**5. Animal Intake Safety**

It appears that the Animal Shelter lacks an adequate intake facility to quarantine and treat injured animals away from the general animal population and staff prior to admittance. The animals with broken limbs, open wounds, malnutrition, and dehydration are brought into an open space adjacent to the animal cages. Once admitted, the animal is taken to a cage where treatment is administered. The Shelter lacks surgical tables, surgical lamps, and instruments to monitor pets during treatment.

The lack of an adequate intake facility may:

- Delay the proper treatment of animals.
- Increase stress level of animals.
- Result in inconsistency in care.
- Expose staff to risk in handling of animals without proper accommodations.

**Recommendation**

Internal Audit recommends that ACC review the need to provide accommodation for the City Veterinarian in treating sick and injured animals through the acquisition of pre-procedure/treatment room isolated from the general animal population.

***Management Response***

*This recommendation requires multiple steps:*

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**a. *Previous Consideration***

*This issue has been researched previously, and since veterinary treatment of injured or sick animals is not our core business, it was determined that the appropriate approach is to contract with other vendors to provide any necessary complex medical treatment, surgery, or emergency services. Currently we have contracts with other facilities (Jefferson Animal Hospital and six other vendors) that allow our own Veterinarian and other contracted veterinarians to provide treatment to animals requiring additional procedures.*

**b. *Request for Emergency Services***

*We will soon be issuing a request for proposals to contract additional emergency veterinary services for after hours and weekend needs.*

**c. *Feasibility Study***

*Over the next six months we will conduct a feasibility study for shelter expansion by: i) Pricing the necessary equipment (surgery table, etc.); ii) Coordinating with Facilities Management to price building materials cost; iii) Discussing with the City asset manager the feasibility of modifying our lease to include an additional portion of the building; and iv) Considering presenting the findings of the feasibility study when the 2017 budget is being negotiated.*