Animal Services:

Important issues still need to be resolved

July 2018



Multnomah County Auditor's Office

Steve March, Multnomah County Auditor



Office of Multnomah County Auditor

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Date: June 19, 2018

To: Deborah Kafoury, Chair; Marissa Madrigal, COO; Kim Peoples, DCS Director; Jackie Rose, Animal Services Division Director; Commissioners Meieran, Smith, Vega Pederson, & Stegmann; Sheriff Reese; District Attorney Underhill

From: Steve March, County Auditor

Re: Animal Services Follow-up Audit

In accordance with our audit schedule, we conducted a follow-up audit on Animal Services operations. We completed our original audit in February of 2016, not long after Director Rose took the helm. In the last two years Director Rose has made a number of changes; however work remains to be done to meet best practices and standards for animal care and positive service to the public.

During the audit we considered many aspects of Animal Services operations while focusing on the findings and recommendations found in the last audit (that audit may be found at: https://multco.us/auditor/animal-services). Significant improvements were made to the layout of the shelter and to provide animal control officers access to criminal background information for fieldwork. On the other hand, data tracking problems, limited behavioral documentation for some animals being released, inconsistent animal enrichment, and barriers to reuniting people and their pets all remain as areas of concern. In addition, many of the recommendations from previous audit remain only partially completed or not completed.

We appreciate the cooperation of the Department of Community Services and the Animal Services Division management and staff. The audit work was conducted by the same audit staff who did the original audit, Nicole Dewees and Jennifer McGuirk. C: Jenny Madkour, County Attorney

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Report Highlights

What We Found

After a thorough review of Animal Services, we are concerned about:

- A lack of consistent animal enrichment that appeared related to staffing choices.
- Barriers that make it difficult for people to be reunited with their pets.
- Limited documentation about decisions to release animals with known behavioral problems.
- Poor data tracking.

We are *pleased* to see:

- Significant improvements to the layout of the shelter.
- Access to criminal background information by animal control officers.

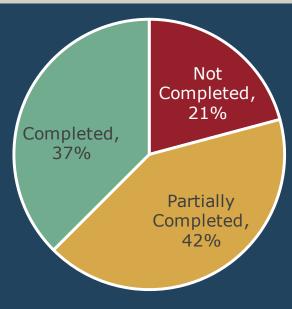
Why We Did This Audit

This report is a follow up to the audit that we issued in March 2016. Due to the large number of findings we identified last time, we decided to conduct a follow-up two years later.

What We Recommend

Animal Services management should implement the recommendations completely.

While many of our recommendations have been implemented, there are still some important issues that need to be resolved.



Source: Auditor's Office

There have been many physical improvements to the animal shelter.



Our original audit stated concerns about interactions of different species. The new separate entrances may help alleviate some of these issues.



Previously, some of the cats were in small kennels, which increased the likelihood of stress and illness. Now all of the cats in the adoption area have larger, double-sided cages. There is also a new enclosed outdoor area for feral cats.



There is a new meet-andgreet room and a separate adoption counseling room, giving the public more privacy while making this important decision.



During our last audit, we saw different species held in the same rooms, which can increase stress and illness exposure. Now there is a separate room for small pets.



Animal Services added swamp coolers in the dog areas, which helps address our previous concerns about high temperatures in the summer.

Photo Source: Auditor's Office

Animal Services needs to assess staffing and more clearly prioritize basic care.

What is happening?

We found that Animal Services:

- Was understaffed for cleaning and feeding animals 66% of the time in FY2017, when compared to the national standard.
- Has not provided daily enrichment to all shelter animals.

Daily enrichment for dogs and cats should include:

- Social contact with people,
- · Mental stimulation, and
- Physical activity.

As Animal Services did during our initial audit, it has continued to rely on volunteers to provide enrichment. But volunteers were not allowed to work with all animals. For example, they did not work with some animals in adoption areas, nor with animals in the shelter's intake areas, where animals initially stay at the shelter. This means that to provide daily enrichment to all shelter animals, Animal Services needs to prioritize giving staff time to work with animals.

During our visits to the shelter, we saw volunteers in the adoption areas. But they did not consistently track which animals they interacted with. This meant that it was not clear whether all animals that volunteers could work with received consistent enrichment.

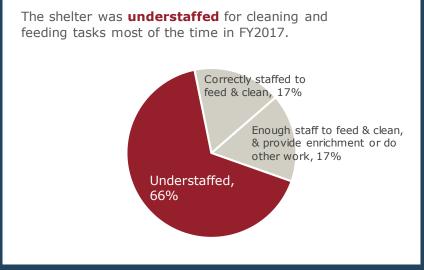
Why does this matter?

When shelter animals do not receive daily enrichment, they are more likely to experience long-term stress, which can lead to:

- · Serious medical issues, and/or
- Behavior problems that can make animals less safe in our community.

There is an opportunity to improve staffing for cleaning and feeding tasks.

On most days in FY2017, the animal shelter did not meet the national staffing standard for feeding animals and cleaning their enclosures. This was nearly identical to what we found in our initial audit. The standard is intended to ensure shelters meet minimum care requirements.



Source: Auditor's Office analysis

Animal Services needs to assess staffing and more clearly prioritize basic care (continued).

What is causing this?

During our initial audit, we compared Animal Services' staffing for cleaning and feeding to the national standard for this work. At that time, we found Animal Services did not have sufficient staffing for these tasks. We recommended that Animal Services comprehensively study total staffing needs as a first step toward ensuring sufficient staffing for feeding and cleaning, and for providing animals with behavioral care.

Animal Services has yet to undertake the staffing study we recommended. But since our initial audit, Animal Services has undergone staffing changes. For example, Animal Services requested funding for two additional Animal Care Techs in its FY2017 budget, and the Board approved this request. The Techs could have helped Animal Services get closer to the cleaning/feeding standard. About a month into FY2017, the Board approved Animal Services' proposal to convert these positions into Care Specialists responsible for behavioral evaluations and animal training.

Animal Services management told us that their vision for staffing will lead to improved care. But during this follow-up, it did not appear that this vision had translated into practice. Shelter experts advise shelters to first cover the basics, such as sufficiently staffing cleaning and feeding, as well as providing consistent enrichment.

There is an opportunity to improve communication among staff members around providing basics, like toys.



As we found in our initial audit, Animal Services seemed to do a good job providing animals with environmental enrichment. For example, housing included comfortable resting places and the shelter provided many animals with items for speciestypical behaviors. Cats consistently had scratching posts and toys, and many dogs had toys.

But on multiple occasions, we found dogs, like the one at left, who did not have a toy. Chewing toys like kongs provide dogs with the opportunity to chew and to work a food acquisition puzzle, which provides good mental stimulation. Management told us that some dogs may have plans that dictate when they have toys. But when we asked staff why certain dogs did not have toys, the staff members did not know. This suggested that if there are plans, not all staff working with animals are aware of them.

Photo Source: Auditor's Office

There are barriers that make it difficult for people to be reunited with their pets.

What is happening?

- 1. When Animal Services finds lost animals, staff post information on the website so that owners can find their pets. However, important information was often missing. We looked at the found reports posted by Animal Services' staff during January through March 2018 and found that:
 - 25% did not have a picture,
 - 18% did not have a found location, and
 - 18% did not include the sex.
- 2. State law and County policy state that stray animals must be held for a minimum of 72 hours so that their owners have time to reclaim them. During a five month time period, we found **8** stray animals that were not held for the required 72 hours.
- 3. The public often wait for a long time to speak with Animal Services staff on the phone. Workday morning wait times can be over 6 minutes and the summer months are particularly bad.

Why does this matter?

The animal shelter is located in Troutdale, many miles from the population center of Multnomah County. In fact, a bus ride from the opposite side of the County could take several hours. Because of this, the other means of locating your pet (internet and phone) should be as streamlined as possible. In addition, when animals are held for less than 72 hours, the reduced time can make it more difficult for owners to pick them up.

What is causing this?

Animal Services staff incorrectly calculated the hold times.

Incorrect hold times and missing information can make it challenging to find your lost pet.



Animal Services only held this stray cat for 48 hours, despite the law requiring a 72-hour hold. This would make it difficult for many owners to find their pet. He was one of the 8 animals not held for the minimum time.



This is a found report from Animal Services' website. It does not contain a picture or an address, making it very difficult to know if this is your lost pet.

Animal Services needs to clarify how it decides an animal is safe.

What is happening?

Multiple staff were concerned that the shelter had adopted out unsafe dogs.

We reviewed notes for a sample of animals, including many who had been on Shelter Review during a recent five-month period. Shelter Review is a process to evaluate animals who may pose a risk to people or other animals, or who have a serious medical issue.

For animals with medical issues, we saw detailed medical histories that provided reasoning for why an animal was euthanized or not. But for animals with behavioral issues, we saw a lack of detailed notes. The reasons for decisions were not easy to determine.

The lack of information may be a reason that we found dogs who exhibited similar behaviors but had different outcomes.

Why does this matter?

Daily behavioral notes for animals and documenting the reasons for decisions would support transparency and consistency.

Criteria for determining animal outcomes can help safeguard against biases in decision-making, and help guard against decision fatigue, which affects the quality of decisions. For public shelters, criteria could help balance the pressure to have a high live release rate with the duty to protect public safety.

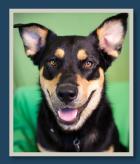
We found some different outcomes for animals with bite histories. Animal Services needs to better document the why behind these decisions.



- Bit a person while trying to bite another animal.
- Euthanized.



- Bit different people on several occasions.
- Euthanized.



- Nipped a child, drawing blood, multiple times.
- Adopted from the shelter.



- Bit dog trainer.
- Returned to shelter.
- Adopted from the shelter.
- Bit new owner.
- Returned.
- Transferred to rescue.

Animal Services needs to clarify how it decides an animal is safe (continued).

What is causing this?

Shelter dogs did not seem to get sufficient daily social interaction with people, physical activity, or mental stimulation. This lack of daily enrichment can affect adoptability. The lack of interaction may be a reason for the limited behavioral notes we found.

Animal Services may be giving greater weight to the results of behavior assessments than to staff observations in the shelter. Recent peer-reviewed research suggests enrichment activities should be given greater focus.

There is an opportunity to improve the disclosure process that helps keep people and pets safe.

One of the recommendations from our initial audit was for Animal Services to disclose all behavioral issues about animals prior to their adoption. Based on disclosure waivers Animal Services has adopters sign and adoption counseling we observed, it seemed like Animal Services was disclosing the information it had about animals.

We found that animal descriptions online and at kennels could be rather generic because they were based on templates. This means that people tend to start the process to adopt an animal before finding out that the animal has behavioral issues.

During one of our shelter visits, we met a senior man who was looking for an easy-going dog to be a companion. He met the dog shown here, who was described as enjoying walks, being with his people, and playing fetch. During the adoption interview, the man learned about the dog's

frequent attempts to bite other dogs and people, and that the dog could not be in a fenced backyard, but would always need to be on a leash held by someone very strong when outside. The man decided not to adopt the dog because it didn't seem like a good match.

If Animal Services posted this information at animal kennels or had it available to potential adopters when they first meet an animal, it could save time by helping people and pets be matched appropriately earlier in the process.



Photo Source: Animal Services

The performance tracking database contains some errors.

What is happening?

- 1. When animals are euthanized, it must be recorded in both the database that tracks animals and the logs that track euthanasia drugs. During a five month time period, Animal Services euthanized 185 animals and 11 of them were not recorded in both places.
- 2. Animal Services incorrectly gave several people more than one citation for the same issue.
- 3. Information on adoption kennels does not always match what is in their data tracking system.

Why does this matter?

- An important measure of Animal Services' success is the live release rate, which measures the percentage of animals admitted to the shelter that were not euthanized. All euthanized animals must be included in the animal tracking database to be accurately included in the live release rate calculation. In addition, euthanasia drugs are powerful and their usage must be closely monitored.
- 2. The public deserve to receive accurate citations.
- 3. Animals may appear to be available for adoption, when they are actually on a stray hold.

What is causing this?

There were no processes in place to check for these kinds of errors.

Animals Services staff have made errors tracking euthanized animals.

According to the drug logs, Animal Services staff euthanized this cat named Ashley, but it was not recorded in their database. She was one of 11 animals who were not recorded correctly, out of a total of 185 euthanized animals.

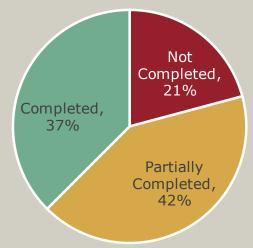
An important measure of Animal Services' success is the live release rate, which calculates the percentage of animals that are not euthanized. Without accurate data, decision makers and the public will not know if Animal Services is meeting its goals.



Photo Source: Animal Services

Status of Recommendations

While many of our recommendations have been implemented, there are still many important issues that need to be resolved.



Recommendations to the Board of County Commissioners

Recommendation	Status
Support Animal Services in getting access to criminal background information.	Completed
Provide Animal Services with the funding to increase staffing as needed to meet minimum national standards for providing care to shelter animals. Auditor's note: Animal Services requested funding for two additional Animal Care Techs in its FY2017 budget, and the Board approved this request. For more information, see our section called <i>Animal Services needs to assess staffing and more clearly prioritize basic care.</i>	Completed
Establish a policy that provides parameters for when it is safe to re-home animals. Auditor's note: Instead of the Board, Animal Services appeared to take some action on this. For more information, see our section called <i>Animal Services needs to clarify how it decides an animal is safe.</i>	Partially Completed

Recommendations to Multnomah County Animal Services Management

Record keeping and data quality

Recommendation	Status
The new animal database should include mandatory fields that must be completed for every animal.	Partially Completed
Conduct manual checks to ensure that there is not conflicting information in the animal records.	Partially Completed
Ensure that all euthanized animals are recorded in both the drug logs and the animal records database.	Not Completed

Recommendations to Animal Services Management, continued

Record keeping and data quality, continued

Recommendation	Status	
The new animal database should produce reports that are accessible online by the public. Auditor's note: After our initial audit, Animal Services purchased a new database system called Shelter Buddy. It appeared that Shelter Buddy did not include functionality for providing online access to the public.	Not Completed	
Health and Safety of People		
Clearly document what information is disclosed about an animal at the animal's adoption or transfer.	Completed	
Document all behavioral concerns and discuss them with potential owners before adoption. Auditor's note: We found behavioral notes to be limited. But Animal Services' employees seemed to discuss concerns they knew about with potential owners.	Partially Completed	
Provide ongoing training to employees and volunteers on workplace safety issues, ranging from managing difficult conversations to workplace violence scenarios. Auditor's note: The majority of Animal Services employees took an active shooter training, as well as training in first aid and disaster preparedness. These kinds of trainings need to be provided on a regular, ongoing basis. A schedule could be documented in a staff training plan, which Animal Services needs to develop.	Partially Completed	
Provide shelter employees, particularly management employees, with training on County personnel rules, which require that the workplace be respectful, professional, safe, accepting of cultural differences, and free from inappropriate or abusive workplace behavior. Auditor's note: The Animal Services director provided a training to employees on professional workplace behaviors. But Animal Services' management employees need training on personnel rules. For example, from FY2016 through the first half of FY2018, few MCAS managers took training that supports compliance with County policies for harassment and discrimination-free workplaces, per SAP data. Also, Animal Services still needs to develop a staff training plan. Multiple staff members expressed concerns with us about management, and we shared these with the Chief Operating Officer.	Partially Completed	
Health and safety of animals in the shelter		
Evaluate existing operating procedures and ensure that employees know how to access and use them. Auditor's note: Animal Services seems to have ensured employees know how to access procedures and use them. In that sense, the recommendation has been completed. But, Animal Services needs to ensure policies and procedures are practiced consistently. There was at least one instance in which an employee did not follow the employee/volunteer adoption policy.	Completed	

Recommendations to Animal Services Management, continued

Recommendation	Status
Develop and implement standard operating procedures for areas that lack them.	Completed
Maintain documentation of all training.	Completed
Remediate the cooling issues in all dog kennels as soon as possible.	Completed
Provide for separation of animal species throughout each animal's shelter stay.	Completed
Continue to improve housing for individual cats by compartmentalizing housing and increasing each housing unit's space.	
Auditor's note: Cats in the Cattery and in the Feral room were in housing that met our recommendation, as were many cats in the Intake areas and in Isolation, a room for cats under medical care. While the shelter still uses some single kennels that do not meet our recommendation in its Intake and Isolation areas, we recognize that space constraints likely make it impossible for Animal Services to meet this recommendation at the current shelter facility.	Completed
Establish contingency housing to ensure that the shelter can accept all animals brought to it by County residents and Field Services' Animal Control Officers.	Partially Completed
Remediate the health and safety issues that Risk Management identified in its Safety Site Visit report as soon as possible.	Partially
Auditor's note: Animal Services needs to correct remaining issues from the Safety Site Visit report.	Completed
Implement a formal training program for new staff as well as ongoing training.	
Auditor's note: Since our initial audit, it appeared that a greater number of staff were receiving training. For example, in 2016 many employees received training on animal handling. But newer staff have not received this training. One reason appeared to be that management still needs a formal training program for new staff, as well as ongoing training for all paid staff and volunteers. A schedule could be documented in a staff training plan, which Animal Services needs to develop.	Partially Completed
Regular training on animal handling and behavior help keep people and animals safe, and could have helped prevent about 30% of recent reported injuries, according to incident report forms.	
Maintain documentation of all enrichment provided, and track this information to ensure all animals receive enrichment consistently.	
Auditor's note: The system to document and track enrichment can be simple, such as the kennel-side white boards Cattery volunteers used. But volunteers need to consistently document providing enrichment, so that it is easy to know which animals have received enrichment that day and which have not.	Partially Completed

Recommendations to Animal Services Management, continued

Recommendation	Status
Provide a comprehensive enrichment program to all cats and dogs in every section of the shelter to ensure each animal receives daily social contact, mental stimulation, and physical activity.	Not Completed
 Comprehensively study total staffing needs, and advocate to the Board of County Commissioners for increased staffing as necessary to help protect the health of the animals in shelter care, including: Increasing staffing for cleaning and feeding to meet National Animal Care & Control Association guidelines. Ensuring adequate staffing to provide the shelter's animals with daily enrichment and consistently prompt behavioral health care. 	Not Completed
 Institute a daily rounds program that includes, at a minimum, A rounds team involving people from different shelter units, Daily decision-making that is clear and specific, and Documentation of rounds' observations, decisions, and actions. 	Not Completed

Scope & Methodology

In 2016, our office issued two audit reports on Animal Services; one report was focused on financial concerns, and the other was focused on other operations. This follow-up audit focused on the operational audit to independently evaluate the status of recommendations related to data integrity and health and safety. Our initial audit included a recommendation related to planning documents. Given our follow-up areas of focus, we did not assess the status of this recommendation.

To determine recommendations' status we:

- Studied current best practices for animal shelters and laws and regulations pertaining to Animal Services.
- Interviewed Animal Services' employees, volunteers, and community partners.
- Analyzed budgets, training, and scheduling information.
- Visited the shelter on numerous occasions to observe operations and monitor the status of animals.
- Went on a ride-along with an Animal Control Officer.
- Analyzed hundreds of animal records.

Our audit work involved assessing data from different systems:

- We analyzed Animal Services' program data in Shelter Buddy, a cloud-based system
 designed for animal shelters and rescues. To assess the reliability of the data elements
 needed to answer the engagement objectives, we performed electronic testing of required
 data elements and interviewed agency officials knowledgeable about the data. The results
 of our electronic testing showed that data elements contained some incorrect and missing
 data. Therefore, we determined that the data were partially reliable for the purposes of
 this report.
- We analyzed various financial and human resources data for time periods between July 1, 2014 through January 2018 from SAP, the County's enterprise resource planning system.
 Based on the annual review of SAP datasets by the County's external auditor, our office has determined that the data were sufficiently reliable for the purposes of this report.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings, and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Audit Staff

Nicole Dewees, CIA, MBA, Senior Management Auditor Jennifer McGuirk, CIA, MPA, Senior Management Auditor



Department of Community Services

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To: Steve March, County Auditor

Cc: Deborah Kafoury, Multnomah County Chair

Marissa Madrigal, Chief Operating Officer

Kimberly Melton, Chief of Staff

Jackie Rose, Animal Services Director Jamie Waltz, DCS Deputy Director

From: Kim Peoples, Department of Community Services Director

Date: June 15, 2018

Subject: Multnomah County Animal Services Audit

Dear Auditor March,

Attached, please find the Department of Community Services' (DCS) response to the Multnomah County Animal Services Audit, "Animal Services: Important issues still need to be resolved."

We appreciate the work of you and your staff and all that went into producing this audit of DCS's Multnomah County Animal Services Division (MCAS). This follow up audit, to the first audit completed in February 2016, shows that we have made, or are in the process of making progress on almost 80% of the recommendations. That audit took place during a time of considerable transition for MCAS and we are pleased with the progress we are making toward improving the operations and functions. Improvements continue to be made within available resources and constraints. Thank you for recognizing the positive work that we have done to date.

We will continue to work to ensure that the Chair and the Board have the data they need to weigh county-wide priorities. We will also continue our work towards achieving industry benchmarks for animal care.

I am available to answer any questions that you may have.

Thank you.

Kim E. Peoples

Director



Department of Community Services

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TO:

Steve March, County Auditor

CC:

Deborah Kafoury, Multnomah County Chair Marissa Madrigal, Chief Operating Officer

Kimberly Melton, Chief of Staff Jamie Waltz, DCS Deputy Director Jackie Rose, Animal Services Director

FROM:

Kim Peoples, Department of Community Services Director

DATE:

June 15, 2018

SUBJECT:

Multnomah County Animal Services Audit Response

Please accept this letter as Management's response to the Department of Community Services (DCS), Multnomah County Animal Services (MCAS) Two-Year Follow-Up Audit conducted by your office during the fall/winter of 2017/2018. Thank you for the comprehensive reassessment of our services and the suggestions provided for ways to continue to improve our services. Since the time of the initial Audit Report in 2016, MCAS has been diligently working to address the issues identified and we are very pleased that your Audit Team found that seventy-nine percent of the original issues had been resolved or are currently being addressed by the division.

With regard to the audit recommendations:

Response to Recommendations

1. Record Keeping and Data Quality

MCAS is highly committed to maintaining complete and comprehensive service records and strives to ensure that all documentation is thorough and accurate at all times. To this end, MCAS has developed a two-prong approach for continuous improvement in this area: 1) utilization of a comprehensive data management system; and 2) staff training and supervision regarding record documentation.

In August 2017, after an extensive RFP selection process, MCAS tackled the first prong by replacing its outdated database system and launching a data management system known as Shelter Buddy. Shelter Buddy is a web-based system developed and managed by the Royal Society for the Prevention of Cruelty to Animals (RSPCA), a very large animal welfare agency in Australia and is currently utilized by over 500 animal welfare agencies worldwide.

In regards to the performance tracking data base errors, uncovered by this audit, MCAS took the issue seriously and immediately corrected the issue once it was identified. Overall, we are very pleased with the functionality of Shelter Buddy, and as we implement and get trained in this new technology, we will continue to improve our record keeping activities and conduct quality assurance and quality control.

The second prong of this continuous improvement project, staff training and supervision, is currently underway and will continue to be an ongoing area of training and attention for all work units. As the management team continues to be trained and becomes familiar with the wealth of administrative reports available in Shelter Buddy, they will continue to develop various tools and mechanisms to ensure timely, thorough and accurate documentation for all records. Additionally, formal and informal training has been, and will continue to be, provided to staff regarding effective record keeping.

Transparency and integrity are two of the values that the Department of Community Services embodies. In an effort to implement those values, MCAS will work towards creating better dashboarding and reporting to communicate the successes and opportunities of our work to our stakeholders and the community.

2. Health and Safety of People

The safety of our employees and the people that we serve is paramount to MCAS. This is evidenced by the numerous modifications made to the facility the past two years and the dedication of the MCAS management team to continually evaluate opportunities for improvements in this area.

Recently, the MCAS Safety Committee was restructured. This restructuring also included a renewed, collaborative relationship with the MCAS management team and Multnomah County Risk Management. MCAS will continue to explore opportunities for staff trainings regarding workplace safety issues and will continue to foster open communications about safety issues or concerns.

MCAS desires a culture of safety, trust and belonging. The Department of Community Services, through the sponsorship of the Director's Office, is implementing *Think* Yes for DCS and the Workforce Equity Strategic Plan. *Think* Yes for DCS is a program that builds a culture of service excellence. MCAS, as part of DCS, will be implementing this with all staff to give them tools to manage difficult conversations and situations. Additionally it creates a culture of support and a workplace that supports problem solving and excellent customer service.

3. Health and Safety of Animals in the Shelter

MCAS is extremely committed to ensuring that all animals that we serve receive the highest quality of care at all times, as evidenced by many of the recommendations

that have been completed, or are in the process of completion. MCAS has made (and continues to make) monumental changes to the facility to prioritize the health and safety of the animals. For the past two years, MCAS and Multnomah County Facilities and Property Management have been working collaboratively to address all identified physical issues. The final major renovation is the installation of new intake and adoption dog kennels. This work is on schedule to be completed by the end of the calendar year.

Lastly, MCAS remains fully committed to ensuring that all staff and volunteers receive the necessary training and resources needed to facilitate daily care and enrichment to all animals in our care. We acknowledge that some areas continue to need attention and improvement and we will be continuing to make improvements in these areas. Despite the fact that some issues still remain, we are incredibly proud of the progress that has been achieved over the past two years since the initial audit. Some of these improvements include, but are not limited to: the development of formalized animal assessment and evaluation processes; the implementation of temperament leveling systems for dogs and cats with corresponding training for volunteers; the creation of enhanced animal housing units leading to less stress and greater enrichment activities; the establishment of the Feline and Canine Care Specialist positions; the restructuring of the management team to provide greater supervision and support to the staff; and the development and/or revision of over 100 operational policies.

In closing, we greatly appreciate the feedback provided by the Audit Team and thank you for taking the time to reassess our services. I remain highly confident in Ms. Rose's leadership of MCAS and look forward to the ongoing improvements to be made by her management team and staff.

Sincerely,

Kim E. Peoples Director