

Animal Legal and Veterinary Medical Consulting
P.O. Box 262001
San Diego, CA 92196
(858) 831-1955

Placer County Animal Services
Report: Risk Assessment Summary from Site Visit,
May 23-24, 2005

Orientation Meeting with: Richard Burton, M.D., James Gandley, D.D.S., Brad Banner, and Larry Anderson

Meeting Discussion covered the following topics:

Reviewed the assessment Master schedule, distribution of Document Review by Dr. Mangiamele, discussion of Manual of Policy and Procedure, request for site visit by subcontractor, Ken Beauregard, on law enforcement/firearms assessment and Baton Training, shelter statistics, scheduling volunteer and rescue group meetings for the second site visit.

Interaction with staff and observation of operations resulted in the following Four Areas which contain Findings, Liabilities and Potential Recommendations/Solutions for Discussion listed in priority order:

Animal Health and Welfare, Occupational Safety and Health in the Shelter, Shelter Supervision, and Animal Identification

Animal Health and Welfare (AHW)

AHW Finding One: Placer County Animal Services does not currently have a full or part-time veterinarian on staff which has resulted in a reduced level of medical care for ill animals. It was observed that when animals are identified as ill, and the decision to transport these animals to private veterinary hospitals is made, it does not occur in a timely manner.

Liability:

Penal Code 597.1 (a)

Every owner, driver, or keeper of any animal who permits the animal to be in any building, enclosure, lane, street, square, or lot of any city, county, city and county, or judicial district without proper care and attention is guilty of a misdemeanor.

Title 16. CCR. 2032 Care to be Provided in a Competent and Humane Manner
The delivery of veterinary care shall be provided in a competent and humane manner. All aspects of veterinary medicine shall be performed in a manner consistent with current veterinary medical practice in this state.

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Recommendation: Hire a full-time California licensed veterinarian, and hire a full-time Registered Veterinary Technician (RVT). An RVT can be utilized to augment medical care provided by a veterinarian as indicated:

Bus & Prof. Code 4840. Animal Health Care Services Approved

(b) Registered veterinary technicians may perform animal health care services on those animals impounded by a state, county, city, or city and county agency pursuant to the direct order, written order or telephonic order of a veterinarian licensed or authorized to practice in this state.

In addition, the current premise permit registered to Placer County Animal Services is on record to expire in 2006, but is registered under Dr. Ann Lesch-Hollis who is no longer employed by the County resulting in the permit becoming void. Once a veterinarian is hired, the permit can be reactivated through a transfer (\$10 fee for printing the new permit that must be displayed at the shelter) if the veterinarian agrees to sign for the permit. Until that time, veterinary medicine can not be practiced at Placer County without a current premise permit. Therefore, even a veterinarian volunteering at the shelter would be unable to diagnose and/or treat animals without first agreeing to sign for the premise permit.

Business & Professions Code Sec. 4853 (b)

"Premises" for the purpose of this chapter shall include a building, kennel, mobile unit, or vehicle. Mobile units and vehicles shall be exempted from independent registration with the board when they are operated from a building or facility which is the licensee manager's principal place of business and the building is registered with the board, and the registration identifies and declares the use of the mobile unit or vehicle.

AHW Finding Two: ACTs are acting as unregistered assistants when administering medications (anthelmintics for deworming, vaccine) and performing screening tests for diseases (parvovirus, heartworm, FeLV/FIV) and based on the results of those tests, making a diagnosis.

Liability:

Bus & Prof. Code 4840.2 Animal Health Care Services Forbidden

Registered veterinary technicians and unregistered assistants shall not perform the following health care services:

- (a) Surgery.
- (b) Diagnosis and prognosis of animal diseases.
- (c) Prescribing of drugs, medicine and appliances.

B&P 4825.1. "Diagnosis," "Animal," "Food Animal," "Livestock" Defined
(a) "Diagnosis" means the act or process of identifying or determining the health status of an animal through examination and the opinion derived from that examination.

Recommendation: It can be argued that these laboratory tests are generally being conducted on animals at the time they have completed the holding period and are legally categorized as County property and the County becomes the owner of these animals. An owner is allowed to practice veterinary medicine on their pet as indicated in: B&P 4827. Exemptions to Practice Veterinary Medicine Nothing in this practice prohibits any person from: (a) Practicing veterinary medicine as a bona fide owner of one's own animals.

However, this would be a tough debate with community animal welfare interests and could be eliminated if a veterinarian and/or licensed veterinary technician were hired by the County.

AHW Finding Three: Dogs that present or become ill at the shelter are housed in the main kennels and not isolated. Standard kennel operations provide procedures for cleaning and disinfecting kennels that house ill animals, isolation of those animals, and preventive measures taken by animal care staff when handling ill animals. There are no standard operating procedures outlining procedures to reduce the spread of disease and limit disease exposure for healthy dogs.

Liability:

Penal Code 597.1 (a)

Every owner, driver, or keeper of any animal who permits the animal to be in any building, enclosure, lane, street, square, or lot of any city, county, city and county, or judicial district without proper care and attention is guilty of a misdemeanor.

Recommendation: Develop Policy and Procedure for dogs requiring medical treatment and isolation that include either establishing a dog isolation area, or if ill animals must be housed in the main kennels, reduce exposure to healthy animals.

A suggested method for accomplishing this would be by moving all ill animals to one end of the kennels leaving an empty kennel in between the healthy and ill population. During hosing and sanitizing of kennels, ACT staff shall clean kennels housing healthy dogs first and kennels with ill animals last. All ACTs entering kennels with ill dogs will wear knee high rubber boots. A boot wash containing a bleach solution (1 :32 dilution) or other disinfecting solution (quaternary ammonias) will be set up at the doorway of the kennels with ill animals whenever ACTs enter the kennel for cleaning, feeding, or dispensing medication. After completing the cleaning of kennels with ill dogs, the ACA will clean and disinfect their rubber boots and store them in the kennel area for use only when contacting the kennels of ill animals.

Regarding cleaning and sanitation, there is no official procedure that specifies the dilution of bleach and water that is used on the kennels. The ACT Supervisor needs to establish specific concentrations of cleaning solutions, add these requirements to the Manual of Procedures, train ACT staff and trustees on the proper dilutions, and monitor staff to make sure his/her directives are being followed.

AHW Finding Four: Some cooling units for the animal compartments on ACO trucks do not function properly and the trucks continue to be dispatched to the field and carry animals during the approaching summer season of hot weather.

Liability:

Penal Code 597.1 (a)

Every owner, driver, or keeper of any animal who permits the animal to be in any building, enclosure, lane, street, square, or lot of any city, county, city and county, or judicial district without proper care and attention is guilty of a misdemeanor.

Recommendation:

Expedite the repair of all cooling units on ACO trucks. Take ACO trucks in need of repair, out of service until repaired. Trucks with faulty cooling units should not be dispatched into the field to collect animals. If the County garage does not repair specialty items like the cooling units, then the distributor of the units should be contacted in order to identify options for repair. If the units can not be repaired, they should be replaced.

Especially during the summer months when ambient temperatures can exceed 100 degrees, it is imperative that the animal compartments of the ACO vehicles are properly ventilated. If the cooling systems are not functioning properly, the County

takes the risk that animals may experience heat exhaustion or stroke which could result in animal suffering and death. All animals under the care of the Department must be treated humanely. In addition, some of the animals collected in the field may be personal property/owned animals and if their health is put at risk or they die due to negligence, this would become not only a public relations risk, but a potential legal liability for the County.

AHW Finding Five: Floors in the cat holding rooms have numerous areas of damage, uneven surfaces and other irregularities.

Liability:

The irregularities in the floor's surface may cause employees to injure themselves during their daily cleaning rotations moving back and forth through these rooms. The numerous damaged areas make it impossible for staff to completely clean and sanitize the floor which increases the opportunity for harboring of bacteria and risk of spread of disease to animals housed at the facility and the transmission of zoonotic diseases to staff and the public.

Recommendation: Floors should be resurfaced so that they are smooth, impervious, and easily cleaned.

AHW Finding Six: The shelter can take additional measures to decrease the spread of disease throughout the shelter.

Liability:

The shelter houses owned animals associated with legal cases, those awaiting redemption, and quarantine animals that must be maintained in good health. Every opportunity to prevent the spread of disease should be implemented.

Recommendation: One additional preventive measure to decrease the spread of disease would be to install wall mounted hand sanitizer dispensers throughout the animal holding areas and corridors. These sanitizers should be for the use of the staff and the public.

Staff should utilize the commercial dishwasher in the Isolation Cleaning Room for all bowl washing rather than hand washing bowls from cat holding areas in the sink along with litter pans.

ACT staff should follow written protocols as developed by the ACT Supervisor for designated concentrations of cleaning solutions for floors and in spray bottles for cages.

When wiping down cages after cleaning spray is sprayed on walls, staff should either use individual towels for each cage, or disposable paper towels.

AHW Finding Seven: The stray dog side is locked and inaccessible to the public on a regular basis, unless a citizen finds an ACT and asks to walk through this holding area.

Liability:

Owners looking for lost pets may not know that there is an additional holding area (the stray section) where their lost pet may be housed in the shelter. ACT staff may also not be available at the time an owner comes to the shelter, the owner may be embarrassed or emotionally stressed over the loss of their pet and not seek assistance from staff.

Recommendation: The stray dog section should be unlocked and available to the public for viewing animals during public hours. Stray animals should not be removed from kennels for interacts or for exercise in other outdoor holding pens because they are not yet County property.

In addition to increasing the opportunity to reunite lost pets with their owners, unlocking the stray area provides an opportunity for people interested in adopting animals from the shelter a chance to see the stray animals and the information on their cage cards will indicate when the interested party can return to the shelter in order to adopt these animals. It is another opportunity to increase dog adoptions from the shelter.

Occupational Safety and Health in the Shelter (OSHS)

OSHS Finding One: The shelter does not have Material Safety Data Sheets (MSDS) on any pharmaceuticals, laboratory solutions, cleaning agents, or other products that staff utilizes on a daily basis.

Liability:

California Code or Regulations Title 8, Section 5194. Hazard Communication.
(h) Employee Information and Training.

- 1) Employers shall provide employees with effective information and training on hazardous substances in their work area at the time of their initial assignment, and whenever a new hazard is introduced into their work.
- 2) Information and training shall consist of at least the following topics:
 - c. Employees shall be informed of the location and availability of the written hazard communication program, including the list(s) of hazardous substances and **material safety data sheets** required by this section.
 - e. Employees shall be trained in the physical and health hazards of the substances in the work area, and the measures they can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous substances, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
 - f. Employees shall be trained in the details of the hazard communication program developed by the employer, including an explanation of the labeling system and the **material safety data sheet**, and how employees can obtain and use the appropriate hazard information.

Recommendation: Obtain MSDS for all pharmaceuticals, laboratory reagents, cleaning solutions and other potentially hazardous products used in the shelter. Locate the product manufacturer by contacting the warehouse or distributor of these products (found by reviewing prior shipping receipts or invoices for the County) and request a hard copy of the appropriate MSDS. Many large scale distributors will have the MSDS for products they sell on hand and be able to fax or mail the MSDS directly to the County. Once this information is collected, it should be organized with a Table of Contents in an MSDS notebook. Copies of the notebook should be made and permanently placed in the medical trailer, euthanasia room and animal holding area.

All staff should be formally trained and made part of the department's Injury Illness Prevention (IIP) Program. Employees need to know what an MSDS is, how it can be used (for treatment/management in the event of an exposure to these chemicals), and where the notebooks are located throughout the facility. As additional hazardous products are introduced and used by the department, the MSDS should be added to each of the notebooks in the shelter.

An employee should be assigned this project as well as maintenance of the MSDS program. Creating the original notebook will be fairly labor intensive.

OSHS Finding Two: During the assessment there were numerous concerns regarding employee injury and safety. These observations are specifically identified below as OSHA Finding Three - Seven. The liability listed below, generally blankets these injury and safety issues.

Liability:

CCR, Title 8, Section 3202, Injury and Illness Prevention Program

a) Effective July 1, 1991, every employer shall establish, implement and maintain an effective Injury and Illness Prevention Program (IIP Program).

The IIP Program consists of eight elements:

Responsibility, Compliance, Communication, Hazard Assessment, Accident/Exposure Investigation, Hazard Correction, Training and Instruction, and Recordkeeping.

Every California employer must establish, implement and maintain a written Injury and Illness Prevention (IIP) Program and a copy must be maintained at each worksite.

Exception No. 4: Local governmental entities (any county, city, city and county, or district, or any public or quasi-public corporation or public agency therein, including any public entity, other than a state agency, that is a member of, or created by, a joint powers agreement) are not required to keep records concerning the steps taken to implement and maintain the Program.

This program has provisions designed to encourage employees to inform the employer of hazards at the worksite without fear of reprisal, requires scheduling of inspections to identify unsafe conditions, procedures to investigate occupational injury and correct unsafe work conditions. At the shelter many of these will be related to animal handling, dog and cat bites and scratches, building hazards in need of repair, and equipment malfunctions. In the field, these hazards would also include animal handling, vehicle and equipment malfunctions, and communication issues.

Attachments to this report include:

§3203. Injury and Illness Prevention Program (in its entirety), and Injury and Illness Prevention Model Program for Non-High Hazard Employers

Recommendation: Develop an IIL Program and select an IIP Program Administrator.

OSHS Finding Three: There is no posted Fire or Emergency Evacuation Plan in any region of the shelter.

Liability:

CCR, Title 8, Section 3215. Means of Egress

- b) In every building or structure of such size, arrangement, or occupancy that a fire may not itself provide adequate warning to occupants, fire alarm facilities or procedures, including an evacuation plan, shall be provided where necessary to warn occupants of the existence of fire so that they may escape or to facilitate the orderly conduct of fire exit drills.
- d) Whenever the building is occupied, exit paths shall be lighted so that they may be easily recognized and all exit and directional signs shall be clearly visible. Artificial lighting sufficient to enable objects to be seen and egress made under emergency conditions shall be provided when natural lighting is inadequate.

§3220. Emergency Action Plan.

a) Scope and Application. This section applies to all emergency action plans. The emergency action plan shall be in writing, except as provided in the last sentence of subsection (e)(3) of this section, and shall cover those designated actions employers and employees must take to ensure employee safety from fire and other emergencies.

(e) Training

3) The employer shall review with each employee upon initial assignment those parts of the plan which the employee must know to protect the employee in the event of an emergency. The written plan shall be kept at the workplace and made available for employee review. For those employers with 10 or fewer employees the plan may be communicated orally to employees and the employer need not maintain a written plan. (§3220. Emergency Action Plan, in its entirety, is an attachment to this report).

Recommendation:

Develop an emergency action plan for both shelters and incorporate this into the Human Resource employee introduction packet for staff as they join Placer County Animal Services. Utilize staff meetings for animal care, field, and clerical to review the newly developed program.

Per OSHS Finding Two Recommendation, have the employee chosen as the liP Program Administrator develop or work with County Facility Services to develop a general layout diagram of both facilities and an emergency exit path to be posted in key locations at the Auburn and North Lake Tahoe shelters.

OSHS Finding Four: Communication Deficiencies Potentially Resulting in Staff Safety Issues

ACT staff often work independently in secluded areas of the shelter with potentially dangerous animals, under wet conditions where they could slip and fall, and in a building that is need of repair to the floors and ceiling which could directly and indirectly injure employees.

The ACT Supervisor identified at least one ACO Truck that does not have a functioning radio that is used by ACT staff to transport animals and/or perform other off-site duties.

The public announcement (PA) system does not function in the back of the shelter in the parking lot.

Recommendation: Establish safety/communication lines with ACTs by mandating they wear radios or walkie-talkies while working in the shelter and/or transporting animals in ACO trucks or County vehicles. Ideally, ACT staff should not be working alone in areas such as Quarantine.

ACO Trucks should not be in service if they do not have a functioning radio. All Animal Control staff must have a communication "life line" to dispatch or Supervisor whenever off-site and driving a County vehicle.

Work with County Facility Service and request the PA system be extended to include the back parking lot area of the shelter.

OSHS Finding Five: Animal Handling in the Quarantine Area

In the quarantine area, staff explained that during daily cleaning and disinfecting of this area, dogs are removed from their kennels and allowed to roam in the main corridor of the room.

During my original walk through of this area, I noted there was not a Rabies control pole in this room which contains dogs that have a known history of biting or aggression that staff is handling. Each ACT I questioned about placing a Rabies pole in this room stated that it should be in the room, but it was around somewhere in the shelter.

Staff also explained that animals in quarantine (those impounded for 10 day Rabies observation, protective custody animals, personal property, animals involved in pending animal abuse/cruelty investigations) are routinely led into the outdoor exercise areas.

Recommendation:

No dog, whether in quarantine, stray, or adoptable kennels should be allowed to roam freely in any area of the shelter. Whenever an animal is removed from an enclosure it should be either restrained on a leash by staff or placed in a holding cage or kennel.

The ACT is put at risk because they are hosing the kennel with the kennel door open and their back to the animal, unable to monitor the animal's activity and with little to no protection from a possible attack by this animal. In addition, the other dogs in holding kennels are approached at the front of their kennel by the free roaming dog, exacerbating the stress of these animals, agitating each dog (making him/her more difficult to handle when the ACT cleans their enclosure), increasing the potential for fighting through the fencing, and nose to nose contact enhancing the opportunity for disease transmission.

Dogs in quarantine should be placed in an empty kennel while their permanent enclosure is being cleaned. If there are more animals in quarantine than there is available kennel space, then a "spill over" quarantine area needs to be identified in the stray kennel section. These cages should be at the end of the stray kennels closest to the quarantine room with one empty kennel between this section and the stray section. Each kennel should have appropriate signage on kennel gates that states these are quarantined animals are potentially dangerous and kennel gates should remain locked at all times.

A Rabies pole in good working condition should be permanently placed in the quarantine area and all staff should be made aware of its location. If an emergency (dog attack, attack on staff) should arise, there will not be time to locate this protective equipment if it is not in the room.

Animals that are in quarantine for rabies should not be moved from their enclosures because they are in quarantine to be isolated and to limit their exposure to other animals and people. They should not be led through the shelter and into outdoor holding areas that can not be effectively disinfected.

Dogs that are housed in quarantine for protective custody, personal property, pending animal cruelty/abuse cases, should not be rotated outside into the exercise pens unsupervised because the back of the shelter is not secured. The rolling gate is not locked and any member of the public can enter and exit the back area through the gate and take an animal or an animal could break out of an enclosure and escape through the rolling gate when it remains open to allow vehicles to pass through. The County would have a tremendous liability in this situation where a possibly dangerous animal was removed or escaped from a County facility due to negligence in security resulting in future public safety issues and concerns.

OSHS Finding Six: Guillotine Doors between Kennels do not function.

Currently, at the initiation of kennel cleaning and sanitation either inmates (with the least amount of animal handling experience) or ACTs are placing three dogs on a leash, walking them out to the back of the shelter and placing them in the Blue Kennels which are not locked or secured. Generally, the most rambunctious or noisiest dogs are removed from the kennel area during cleaning. Each time an animal is removed from an enclosure, it increases the potential for staff injury or animal escape. Compounding this situation is the fact that this cleaning occurs at a time when the shelter is not open to the public and staff pays the least attention to security (Blue Kennels are not locked and the rolling gate is not locked) increasing the opportunity for losing animals through escape or theft. As kennel cleaning continues, the remaining dogs are each moved into the clean, neighboring kennel by being placed on a leash and handled by staff.

Recommendation:

If the guillotine doors functioned, dogs could be coaxed through the guillotine door with minimal handling and secured by sliding the door closed during the cleaning process instead of walking each dog individually on leash to a clean, neighboring enclosure. This would decrease the potential for employee injury, would save time in the daily kennel cleaning process, and lower the stress for the animals that are not leash trained or not easily handled.

Department of Facility Services should be called out to the shelter to assess the cost for repair of all guillotine doors in the kennels. A timely repair schedule should be developed and implemented. The Kennel Supervisor should communicate with Facility Services to make sure they stay on schedule. During repairs, ACT staff should be made available to assist in moving dogs out of kennels while guillotine doors are being repaired.

If kennels are full, requiring that some animals be moved to the Blue Kennels during daily kennel cleaning, move only one dog and transfer dogs to clean kennels by using the operational guillotine doors. Secure the Blue Kennels by using the padlocks whenever a dog is placed in them.

OSHS Finding Seven: Perform euthanasia only in the room specified for that procedure.

I observed staff performing euthanasia in several areas besides the euthanasia room including: the feral cat holding area and was told that earlier that week a citizen brought in a possible Parvo puppy in dying condition that staff took to the RFA room and euthanized.

Recommendation:

Euthanasia should only be performed in the designated euthanasia room. When controlled substances like euthanasia solution and pre-euthanasia anesthetics are taken out of the room in loaded syringes there is an increased risk of accidental injection of staff and abuse of the drug (inmates may be working in these areas and have access to controlled drugs like ketamine). In addition, controlled substance logs remain in the euthanasia room and should be completed directly after performing the procedure.

When performing euthanasia in an area not designated for the procedure, the following problems may be encountered by staff:

- The room may not have the proper table for safe animal restraint,
- Inappropriate lighting to efficiently and comfortably perform the procedure,
- Poor availability to equipment (clippers to remove hair and better visualize veins, restraint equipment, protective gear like gloves),
- Staff would not have the ability to redose if the calculated dose is not properly delivered (malfunction of syringe, vein is blown) and would have to return to the euthanasia room to retrieve additional solution,

- Increases the opportunity that controlled substance logs will not be completed accurately or timely,
- In a room other than a secured euthanasia room, during or after administration of pre-euthanasia anesthetics or euthanasia solution animals may escape the handler (i.e. the feral cat room ceiling has sections missing where cats gain access and can travel throughout the building). If these compromised animals are not located in a timely manner it places them at risk for injury, or if they have received the euthanasia injection they may be injured or suffer prior to death.
- Depending on the time of day the procedure is performed, staff may encounter or put the public at risk (citizens may enter the room or observe through windows the procedure being performed) if not performing the procedure in the secured euthanasia room.
- Once the procedure is completed, staff will have to remove the body from the room and carry it to the dead animal cooler which may result in encountering members of the public.

Euthanasia of feral cats using this procedure will require transporting feral cats from their current holding area to the euthanasia room. This can be facilitated safely by utilizing a modified "feral cat den" that is placed in the stainless steel cage. These dens can be secured with the cat in them, lifted out of the cage and safely carried to the euthanasia room. Each den has circular openings in strategic locations that will allow for a pole syringe to pass and inject a feral cat with an appropriate dose of a pre-euthanasia anesthetic which will allow for safe handling of the animal when it is removed from the den for final intravenous or intracardiac injection of euthanasia solution and confirmation of death. (Sacramento County Animal Control currently uses the feral cat den and should be contacted for manufacturer/distributor information.)

The euthanasia section of the Manual of Policy and Procedures needs to be re-written to reflect these recommendations and staff need to be trained to perform this procedure only in the designated euthanasia room.

Shelter Supervision (SS)

SS Finding One: There is no designated Acting ACT Supervisor (or Lead) when ACT Supervisor is not on site or during the weekends.



There was no designated supervision of trustees/inmates or ROP students.

Liability:

ACT staff is working unsupervised and are unable to make decisions in a timely manner because they are waiting to receive direction from the ACT Supervisor. This results in delayed care for ill animals, extends the time for small and large project completion, results in varying levels of compliance with policies and procedures, and increases the potential for problems/violations by trustees.

Recommendation:

Due to the increased responsibility the ACT Supervisor currently has (acting Field Supervisor and supervision of clerical staff) a system must be put in place that assigns an ACT as the Acting Supervisor or Lead (title dependent on job description restrictions) when the ACT Supervisor is not on site, unavailable, and during the weekends. This employee will be given the authority to make decisions in acute situations and gather information for further assessment by the Supervisor in chronic situations (those not requiring immediate attention.) Therefore, the ACT or ACT(s) chosen to periodically assume this responsibility will receive additional training by the ACT Supervisor. The maximum number of hours or occasions that an ACT will act as a Lead must be in compliance with job description restrictions.

Acute situations should include, but not be limited to:

- Monitor staff to assure that all safety procedures are being followed and be proactive in addressing unsafe working conditions,
- Euthanasia of animals in dying condition,
- Making recommendations for ill animals to be transported to a veterinarian and arranging for the transport,
- Addressing any feeding issues (purchasing food if necessary) to make sure animals are fed species and age specific diets,
- Be available to assist ACTs, ACOs, or clerical staff with unusual animal handling problems,
- Understand and follow County policy to assist animal welfare and rescue groups with transferring animals in situations requiring immediate attention,
- Follow County policy when dealing with irate or difficult citizens and know the chain of command for assistance and facilitation if necessary,
- Supervising trustees and ROP students, and
- Upon finishing his/her shift, confirming that all animals are properly housed, feed, cared for, and secured in compliance with County policies and procedures.

The ACT Supervisor needs to improve the supervision of the trustees and ROP students or designate an ACT each day that will directly supervise the inmates and ROPs. The supervisor should delegate tasks and monitor the completion of those tasks, including the humane handling of animals. An ACT should be working with trustees when they are handling animals (Le., moving dogs and cleaning kennels, handling large animals) and/or continually checking on them during these hours of cleaning. In addition, there should be a standardized training program for the trustees and ROP students on humane animal handling, prevention of disease transmission, zoonotic diseases, and safety.

Also, the ACT Supervisor mentioned seminars he would be attending on behalf of Placer County that would take him to other parts of the state for several days in a row. I recommend that an ACT Lead be chosen and provided training on the topics discussed above, in advance of the ACT Supervisor's absence.


Off-site training and attending seminars should not conflict with the required day-to-day shelter and field operations. In addition, attending external training programs should be a reward reserved for staff that are receiving outstanding employee performance reports and achieving goals established by Administration.

SS Finding Two: Lack of Follow Through and Accountability in the Animal Care Division with Short and Long Term Tasks, Issues, and Requests to Administration

Liability:

Numerous examples were exhibited to me during my site visit where the ACT Supervisor and ACT staff discussed situations with me that required action or follow through on their part, completion of a task, or solving a long term problem. My observations were that staff tended to half heartedly make a single attempt to rectify a situation or problem. If that attempt was unsuccessful, they discontinued pursuing the solution, did not identify alternate solutions, and/or continued to work in a substandard fashion without resolving the issue or problem.

Daily issues that should be top priority (i.e., transporting animals to private veterinary hospitals for medical care) started out as a top concern but were not prioritized in order to complete the task. I believe this is due to ACT staff waiting for Supervisor or manager approval to complete tasks that are not specifically in their routine daily work schedule.



Supervisory staff must be able to problem solve, communicate, motivate and take charge of staff, and successfully obtain resolution to problems through administration when necessary.

Examples of situations I observed that required attention, that were not resolved in a timely manner or were not resolved at all:

- See OSHS Finding Four: Communication Deficiencies Potentially Resulting in Staff Safety Issues
- Ill Animals Requiring Veterinary Care at a Private Hospital
- On May 24th, animals approved for veterinary care at a private hospital were not transported in a timely manner,
 - ACT arrived at the hospital over 1.5 hours after communicating to the hospital that the animals would be taken immediately,
 - The hospital is approximately a ten minute drive from the shelter.
 - Upon arrival, the veterinarian had already scheduled surgery and could not examine the animals until later in the day,
 - This created a negative public relations issue with this veterinarian and his staff that Animal Control does not deliver animals requiring medical care as promised, in a timely manner. Hospital staff may also conclude that Animal Control doesn't prioritize the need for animals to receive medical care.
 - As a result, the animals did not receive medical care for an additional day due to the animal care staff's lack of attention to the matter,
- ACT Supervisor/ACTs did not contact the hospital to check on the status of the animals that were to be picked up and returned to the shelter for housing overnight.
 - At 4: 15 p.m., I encouraged ACT staff to contact the hospital to check on the status of the animals. Staff said they would wait for the hospital to call them. After continued encouragement by me, an ACT called the hospital and was informed the animals would be ready at 4:45 p.m.
 - ACT staff became concerned that their shift would be over and someone now would have to work overtime to pick up the animals.

They attempted to solve the problem on their own by discussing having the swing shift ACO pick up the animals, but the ACO was not particularly cooperative. It was decided that one ACT would stay overtime and go with the ACO (due to an oversized animal carrier that needed lifting) to pick up the animals and rehouse them at the shelter.

- This entire scenario could have been minimized [REDACTED] would have made sure the animals were transported immediately to the private veterinary hospital. Staff could have waited for the doctor to examine the animals and immediately returned them to the shelter. The animals would have started their medication/treatments immediately rather than waiting another entire day.
- Cooling Units on ACO Vehicles In Need of Repair
- The ACT Supervisor pointed out to me a number of vehicles that did not have properly functioning cooling units for the animal compartments.
- I inquired if the vehicles were out of service and the Supervisor said no they still were used in the field.
- I asked why the units had not been repaired and was told that there was a controversy on the County garage versus the unit manufacturer providing repair service.
- I asked what he was doing to resolve it and his answer was that he had tried but wasn't getting anywhere with it. He added as a solution, that two new vehicles were scheduled to be delivered to Animal Control that had properly functioning cooling units. But of those two vehicles, one will be assigned to the North Lake Tahoe shelter. Therefore, this does not completely solve the vehicle cooling unit issue at the Auburn shelter.
- The result is that the units are still not functioning on several trucks, there is no concrete plan or schedule to have them repaired, and field officers continue to use the trucks as the weather gets warmer which will place animals impounded in the field in danger for heat exhaustion and stroke. These are violations that officers cite citizens for in the field (animals in poorly ventilated vehicles, unattended in parked vehicles) yet, they are out of compliance.

This lack of direction by the ACT Supervisor causes situations at the facility that can result over time in chronic problems involving safety, animal care, and public relations.

Recommendation:

Reduce the current level of responsibility for the ACT Supervisor. He should not be in charge of the animal care staff, field staff and clerks. Whatever division he is assigned to must receive his full attention and commitment. He must be available for staff, not just to answer their phone calls, but to problem solve, supervise staff in assignments and make sure tasks/projects are completed in a timely manner. The ACT Supervisor should also work directly with staff, assist them on the floor as necessary and as a result be able to be proactive regarding replacing/adding equipment, scheduling, and staff support.

If the County provides training for improving supervisory skills and management, the ACT Supervisor should be enrolled.

Animal Identification (AI)

AI Finding One: Shelter animals do not wear external identification while housed at the shelter.

Liability:

When animals are unidentified or misidentified, there is the potential that a variety of situations of mistaken euthanasia and associated liability may arise:

- Euthanasia of owned animals,
- Euthanasia of personal property,
- Euthanasia of evidence animals,
- Euthanasia of quarantine animals

In addition, at Placer Animal Services, security of the facility and the animals is lax. Many of the animal enclosures (cages and kennels) are not padlocked during hours that the facility is open to the public, and the back rolling gate is not padlocked from early morning to shelter closing hours. This increases the opportunity that animals may escape their enclosures and the facility, or be stolen from the facility. In either event, if the animals were wearing Animal Service identification (tab bands or chain collars with tags) there is an increased possibility that the animals will be identified by the public and returned to the shelter or in the case of stolen property, be recovered by law enforcement.

Recommendation:

All animals impounded into the shelter must wear external identification (neckbands or chain collar and tag) and the tag number must be recorded on the respective cage card and in the computerized animal inventory system. Additional safeguards

against animal identification error such as taking digital photographs of animals and incorporating those pictures onto the cage card are excellent ancillary programs that will be more fully explored during the Site Visit for Week Three (May 31-June 1, 2005).

The department should develop protocols that establish:

- Selection of a tag manufacturer for dogs and tab bands for cats,
- The numbering and/or color code system (distinguishing quarantine from personal property from stray impounds) for external identification,
- Determine who will order tags from the manufacturer and who will maintain the inventory of chain collars and tags,
- Where the tags will be located (pending discussion of relocating the impound area to a permanent indoor or sheltered area at the back of the shelter.)
- Who will be placing external identification on impounded animals,
- Methods for sanitizing and recycling tag numbers into the system so tags can be reused,
- Procedures for retagging animals who have lost or destroyed their tags during the impound period,
- Incorporating external identification confirmation procedures in the euthanasia process, and
- Monitoring impounded animal to make sure they are wearing external identification.

AI Finding Two: A daily inventory of the animals and shelter "walk through" is not currently conducted.

Liability:

Without daily monitoring of animal counts, it delays staff's ability to discover if animals are missing due to escape or have been stolen from the facility. In addition, performing daily inventories also forces staff to physically walk through the entire facility first thing in the morning not only to count animals, but to make observations of each animal. When this doesn't occur, it could jeopardize expeditious care of animals and result in liability to the County for lost or stolen animals.

Recommendation:

Every morning, an accurate daily inventory should be performed by the ACT Supervisor or appointed Lead which itemizes every animal housed at the shelter. This should include generating a daily computerized inventory based on impound

and final disposition entries and a physical walk through and count of animals in each holding area. These two inventories should both reflect the same total daily animal inventory numbers. Any discrepancy should be researched and resolved prior to euthanasia, transport of animals for spay/neuter surgery, or redemptions for that day.

Examples of the importance of staff's early morning daily observations and resultant action that could improve animal care and proactively expedite operations include:

Observation

Identifying animals showing signs of illness

Identifying animals that have died overnight in the kennels

Identifying animals that may have escaped

Identifying animals that have been stolen

Action

Animals can be isolated faster, prevent spread of disease, and can be examined and treated more expeditiously.

Remove the body and investigate the cause of death (Le. infectious disease) and take action if necessary to isolate and prevent further spread of disease.

Begin searching for the animal, alert shelter and field staff of the animal's description. Identify method of escape and take measures preventing escape of other animals in similar holding situations.

Report stolen animals that are part of personal property, animal abuse/cruelty investigations, or under quarantine to a Supervisor. Investigate the method used to steal the animal and take measures preventing other animals in similar holding situations from being stolen.

QUICK FIX ITEMS

(Site Visit May 23-24, 2005)

Animal Health and Welfare (AHW)

- Amend the food orders placed by the department to include canned dog and puppy, and canned cat and kitten products. Allow the ACT Supervisor to regularly place canned product orders with the routine dry food orders.
 - ACT staff stated that they do feed canned products to animals in special circumstances, but purchase food on their own time and with their own money.
 - Canned products are necessary in a shelter environment for the following reasons:
 - Nutritional needs for puppies/kittens, aged animals, to stimulate appetite in ill animals, and for administering medication.
- Microchip scanners
 - There is no scanner in the euthanasia room and animals are not scanned prior to being euthanized. Animals must be scanned prior to euthanasia and this should be incorporated in the appropriate section of the Manual of Policy & Procedure.
Food & Ag Code 31108. Dogs: Impound Holding Period and Food and Ag Code 31752. Cats: Impound Holding Period
(c) During the holding period required by this section and prior to the adoption or **euthanasia of a dog (cat) impounded** pursuant to this division, a public or private shelter **shall scan the dog (cat) for a microchip** that identifies the owner of that dog (cat) and shall make reasonable efforts to contact the owner and notify him or her that his or her dog (cat) is impounded and is available for redemption.
(emphasis added by author)
 - Staff complained about current scanner not consistently scanning all microchips. Contact and program information for leading microchip and scanner manufacturers are listed below in order to replace the current scanner and for consideration of microchip implantation at the time of adoption.
 - AVID (800) 336-2843 (see attachment for additional information provided by the AVID sales representative)
 - The first scanner is free; each additional scanner is \$99.

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- Microchips cost \$5.25/microchip sold in boxes of 25, if over 1000 microchips are ordered in one year, the price per microchip is reduced to \$4.95/microchip.
- If the shelter performs the registration for the adopter, the charge is \$5. If the pet owner registers their pet through AVID, the charge is \$15.
- AVID stated that most shelters add \$20 to the adoption fee to cover the cost of the microchip and registration (shelter price is \$10.25) which allows a small surplus which can be ear marked to purchase scanners for ACO trucks.
- Home Again ((800) 521-5767 - Placer local sales representative, Lenaya Quinn (530) 320-0752
 - The shelter may be able to negotiate for one free scanner; each additional scanner is \$250.
 - Microchips cost \$5.95/microchip when purchasing 1500 microchips annually
 - Registration fee is \$5 through the shelter at 50 registrations/mailling, or can be performed on-line by shelter clerical staff. If the pet owner registers their pet through Home Again, the charge is \$6.25.
- Contact County Facility Services to repair the missing sections of ceiling in the Feral Cat Room (see OSHS Finding Seven, Recommendation section).
- Research and contact the manufacturer of Feral Cat Dens to be used in the Feral Cat Room. (see section OSHS Finding Seven, Recommendation: final paragraph regarding euthanasia of feral cats)

Occupational Safety and Health in the Shelter (OSHS)

- Spray bottles used throughout the shelter for cleaning cages and other daily spot cleaning, currently do not have a label indicating the contents of the liquid mixture.
 - Either use water repellent markers or buy labels to be applied to all spray bottles.
 - Indicate the content of the bottle and at what concentration

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- Train staff in refilling the spray bottles with the same concentration of bleach to water (1 :32 dilution) and monitor that it is being done consistently. Current concentrations may be too low to be an effective bactericide.
- An additional refrigerator should be purchased for the ACT trailer.
 - Staff is storing food for human consumption in the refrigerator that is also used for storage of animal vaccine and laboratory test reagents.
 - Further discussion of relocating the impound area (Week Three, Site Visit Two) will also include relocation of the refrigerator to store vaccine and other pharmaceuticals needed for the impound process.
- The dead animal cooler (including barrels and floors) is currently being cleaned twice per month. This room needs to be thoroughly cleaned on a weekly basis, especially in the busy summer months. The door to the cooler should also have a padlock placed on it.

Safety

- Permanently place a Rabies Pole in the quarantine area (see section OSHS Finding Four, Recommendation)
- Order squeeze cages (staff indicated they use the ACES catalog) for safe and humane handling of feral cats and wildlife when administering preeuthanasia anesthetics.
- Order plexiglass shields that contain small openings for the insertion of jab sticks when approaching cats in cages that are difficult to handle and require tranquilization.

Security

- Purchase key locks for all holding cages for animals impounded into the shelter.
 - Amend the Policy & Procedure Manual to require all animals be secured while housed at the shelter.
 - ACT Supervisor shall monitor on a daily basis that all cages and holding pens are secured, including the Blue Kennels used for impounds.
- The rolling gate into the back of the facility should have a chain and padlock that is secured at all times.
 - Located directly through the currently unlocked rolling gate is an easily accessible RFA room containing a variety of knives and

cutting instruments, the unlocked dead animal cooler, various supplies for animal care, holding cages, and fighting cocks that are part of an illegal animal fighting investigation.

- Future consideration for an electronic gate to be installed in place of the manual rolling gate.
- ACOs will need to unlock and lock the rolling gate upon their departure and arrival into the facility.
- Trappers will not be allowed access through the rolling gate without checking in with either the clerical staff or the ACT Supervisor.
 - Trappers will be registered with the department (name, address, phone number, other pertinent business information).
 - Trappers will identify themselves and sign in with the shelter when requesting to deposit dead animal carcasses in the dead animal cooler.
 - Trappers will identify how many and what species they are depositing in the cooler.
 - The department should consider a fee for the use of the cooler and sanitation charges for dead animal pick up.
- The RFA room (used for decapitation procedures and submission of samples to the County veterinarian for Rabies testing) is inadequately secured. The plywood sides do not fully come together, making it easily accessible despite the door being locked, there is a window directly over the decapitation table, and the cabinets contain a large number of knives and other cutting implements. This building needs to be repaired to be more secure or relocated to a more secure room within the shelter.

Public Relations

- Post a copy of the cage/impound cards of cats that are housed in isolation and out of view of the public in the entrance to the animal holding area.
- Develop appropriate signage at the entrance of the shelter that directs the public to the clerical area for purchasing licenses, assistance with a stray or owned drop off, euthanasia request, viewing adoptable animals, searching for lost pets.
 - Consider a different configuration of the entrance to fully utilize both front doors.

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- One doorway could be for administrative business (licensing, adoption paperwork) and the other could be set up as an animal relinquishment area with holding cages.
- The ACT Supervisor should make up a master list of short and long term clean up projects at the shelter (indoor and outdoor) and set up a schedule for completing each project by priority of improving shelter operations and pride in the facility presentation to the public.
 - Indoor areas to review:
 - Repair or remove the Animal Kiosk in the shelter hallway. Contact other agencies that use the kiosk and identify contacts for repairing the unit.
 - Outdoor areas to review:
 - Storage areas with accumulation of cages, supplies etc.
- ACT staff should be in full uniform
 - The ACT uniform should consist of a shirt and pants.
 - An embroidered patch should be incorporated onto the sleeve of the uniform indicating the ACT position and appropriate supervisor designation.
 - These actions will improve the level of respect the ACT staff will receive from the public at the shelter, from private veterinary hospitals when they deliver and pickup animals and when they are performing other duties on behalf of the County off-site of the shelter.
 - A uniform allowance should be considered, if possible.
 - Utilization of a uniform cleaning company should be considered in order to ensure staff has clean uniforms available due to the high probability of uniform staining throughout the average work day.

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Attachments

California Code of Regulations, Section 3220. Emergency Action Plan

California Code of Regulations, Section 3203. Injury and Illness Prevention Program

Injury and Illness Prevention Model Program for Non-High Hazard Employees

AVID Shelter Commitment Request for Scanner