

**Placer County Animal Services  
Report: Risk Assessment Summary from Site Visit,  
May 31- June 1, 2005**

**Site Visit #2 - Introduction Meeting:** Contractor met with Larry Anderson and was introduced to the pending contract veterinarian for shelter medical services.

Meeting Discussion covered the following topics:

Review of the Report: Risk Assessment Summary from Site Visit May 23-24, 2005, scheduling confirmation for pending day meetings scheduled with support groups, the evening rescue group meeting, and the North Lake Tahoe Site Visit scheduled for June 1st.

A separate report has been submitted outlining support and rescue group meetings from May 31, 2005.

**This report includes interaction with North Lake Tahoe staff and observation of operations on June 1, 2005 which resulted in the following five Areas with their respective Findings, Liabilities and Potential Recommendations/Solutions for Discussion listed in priority order:**

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

Tahoe Shelter Public and Shelter Safety (TS - PSS)

**TS - PSS Finding One:** Failure to inform/Dereliction of duty in a potentially dangerous situation.

The ACO on duty would not accompany the contractor during the walk through of the facility and did not orient the contractor to animal holding areas besides the indoor kennels and cat room. The contractor was not informed by the ACO that several Pit Bulls were loose and unsupervised in the outdoor exercise enclosure. The contractor came into contact with these loose dogs during her inspection and was able to escape an unprovoked attack by one of the dogs by retreating to the washing room and securing the door. The contractor did not have access to the contractor (County Incident Report filed [REDACTED]). When the ACO found the contractor secured in this room and was told about the aggressive behavior displayed by this dog, the ACO replied that it didn't surprise him. Later, the contractor was informed that the same Pit Bull had recently bitten a volunteer at the shelter and the ACO was aware of this documented bite incident.

**Liability:**

The Pit Bull being held at the shelter and involved in this incident meets the legal definition of a potentially dangerous dog:

Food & Ag 31602. Potentially Dangerous Dog Defined "Potentially dangerous dog" means any of the following:

(a) Any dog which, when unprovoked, on two separate occasions within the prior 36month period, engages in any behavior that requires a defensive action by any person to prevent bodily injury when the person and the dog are off the property of the owner or keeper of the dog.

(b) Any dog which, when unprovoked, bites a person causing a less severe injury than as defined in Section 31604 (Le. injury resulting in muscle tears or disfiguring lacerations).

The following action is required for a dog that meets the criteria for potentially dangerous:

Food & Ag Article 3. Disposition of Potentially Dangerous or Vicious Dogs 31642. Dog To Be Kept Under Control At All Times

A potentially dangerous dog, while on the owner's property, **shall, at all times, be kept indoors, or in a securely fenced yard from which the dog cannot escape, and into which children cannot trespass.** A potentially dangerous animal may be off the owner's premises only if it is restrained by a substantial leash, of appropriate length, and if it is under the control of a responsible adult. (Emphasis added by author)

The potential for County liability is high when unsupervised loose animals with a history of aggressive behavior and an unprovoked bite history are released into the unsecured outdoor exercise enclosure exposing staff, volunteers, and members of the public to a safety situation that could result in severe injury or even death.

**Recommendation:** Establish and provide training for staff on security precautions associated with public access to the outdoor exercise enclosure (see TS - PSS Finding Two, Recommendations). Upgrade supervision of officers and assure adherence to County Policies and Procedures. Follow County disciplinary action when staff's actions create a potentially dangerous situation for employees and the public.

**TS - PSS Finding Two:** Inappropriate security precautions associated with public access to the outdoor exercise enclosure (see TS - PSS Finding Two for description of contractor's encounter with a loose Pit Bull).

**Liability:** When the public is allowed unlimited, unsupervised access to the outdoor exercise enclosure it increases the potential for public confrontation with multiple dogs and risks of injury by tripping/falling, being knocked over by large dogs, and bite injuries.

**Recommendation:** Dogs should only be released into the outdoor exercise enclosure (excluding adoption interactions) when the shelter is not open to the public due to the potential safety liabilities when transferring dogs from indoor kennels to the outdoors and the opportunity for unsupervised public contact with the dogs in the outdoor enclosure.

The entrance to the bowl washing room should be locked and not accessible to the public during open hours of operation.

Whenever dogs are in the outdoor exercise area, the door should be locked and secured from the inside. A small window should be cut in the door at eye level to allow staff to view from the interior of the room which dogs are standing on the opposite side of the door prior to opening it.

Permanent signage on the exit door to the outdoor exercise enclosure should read, "No public access without staff assistance."

**TS - PSS Finding Three:** Potentially dangerous animals running loose in kennel area and bowl washing room when being relocated to the outdoor exercise enclosure during hours the shelter is open to the public.

**Liability:**

The County may be potentially liable for injuries to people on county property especially if County employees are shown to be negligent.

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**Recommendation:** Improve safety training and supervision of ACOs while working in the dog kennels at the shelter. The following procedures should be added to the section of humane handling of dogs during relocation from the kennel area:

- No dog shall be relocated within the shelter (including dogs transferred from kennels to the outside exercise enclosure) without being placed on a leash, rope, Rabies pole, in a carrier/transport cage, or gurney (if ill or injured) and will be moved individually.
- Dogs in quarantine, isolation, documented history of aggressive behavior, exhibiting aggression towards animals or people, or have been involved in an unprovoked bite should not be removed from their kennel (except during daily kennel cleaning when they are transferred to a nearby secured kennel utilizing appropriate restraint - i.e., leash, Rabies pole) and should not have access to the outdoor exercise enclosure.
- Dogs will not be allowed to run loose in the kennel aisles agitating dogs secured in kennels.

Supervision at the shelter must enforce these safety procedures at all times when dogs are being handled at the shelter.

**TS- PSS Finding Four:** Shelter animals are being adopted/placed that are not behaviorally assessed and/or have proven pre-existing behavior problems that may pose a public safety risk.

**Liability:**

Animals that are not behavior assessed, do not pass official Placer County Behavior Assessment procedures, or exhibit aggressive behavior (unprovoked attempted bite or successful bite) while impounded or as indicated in historical documentation, and are adopted out to the public, transferred to other shelters or rescue groups for adoption to the public pose a potential liability to the County if those animals attack, injure, maul, or kill someone.

**Recommendation:**

The ACO whom I spoke with during the assessment told me that he was not qualified to make behavior determinations on impounded animals, and also stated that all animals were adopted from the Tahoe Shelter due to their attempt to achieve "No-Kill" status, even if they posed a public safety threat (i.e. biting history, feral status etc.).

The County must uniformly train all employees involved with the adoption process the official Behavior Assessment procedure. In addition to training, the County must develop detailed Policies and Procedures for the interpretation of behavioral assessments on impounded animals performed by staff, limiting the degree of subjectivity among evaluators, when determining final dispositions of animals.

Animals with a bite history, attempted bites or similar behavior resulting in a public safety concern, should be considered unadoptable and not be adopted or transferred, such animals should be humanely euthanized. County Counsel should develop a waiver for Animal Services when animals are adopted/transferred that may exhibit behavior problems, but are not assessed to pose serious public safety concerns.

**TS - PSS Finding Five:** Feral cats are housed collectively with socialized cats that are directly accessible to the public in the cat room. There is no signage on the cage to differentiate ferals from those that are adoptable.

**Liability:**

When feral and non-feral cats are housed in the same room and not properly identified, it increases the potential that the public and/or volunteers may try physically to interact with these animals which could result in injury.

When feral cats are housed in cages in a shelter, it creates a highly stressful environment for these animals. In addition, when these animals are housed in a room that would be classified as a high traffic area, such as the cat adoption room, they become more stressed which can cause reduced appetite, lowered immunity and therefore susceptibility to infectious diseases, and increased acts of aggression towards handlers. It is the responsibility of shelter staff to accommodate impounded animals in humane circumstances that reflect each species and groups (i.e., feral cats) characteristics and needs.

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:**

Ideally, feral cats should be housed separately from adoptable cats in order to lower their stress levels by decreasing their interaction with people and to lower the potential for staff and public injury and infectious disease outbreaks in the general population. If this is not possible, moveable, professional signage that can be placed on feral cat cages should be available in cat holding rooms with the following information:

- Caution: Feral (non-domesticated) Cat
- Do not attempt to put your fingers in this cage
- Do not attempt to handle this cat

In addition, small stickers should be available that can be affixed to feral cat impound cards on cages that are either pre-printed with the words "Feral Cat" or staff can write the words "Feral Cat" directly on the sticker.

**TS - PSS Finding Six:** The door leading to the cat room had the following signage, "Please open door slowly, sometimes cats are out of their kennels."

**Liability:** Unsupervised/unattended animals that are not properly confined at the shelter have the potential to:

- Cause injury to people entering the room if the animal is startled, feels threatened, is fearful, or is handled inhumanely by inexperienced members of the public,
- Become injured or lost in the shelter due to inappropriate safety precautions in a room versus a secure animal enclosure.

**Recommendation:**

No cats housed at the Tahoe Shelter should be allowed to roam in the facility without being properly supervised or restrained (either in the proper cage, carrier) by employees or trained volunteers. When cats are removed from their cages to be placed in the group housing glassed in area of the cat room, they should not intermittently be allowed to roam freely in the main holding area of the cat room.

**TS - PSS Finding Seven:** Inappropriate procedures for performing owner requested euthanasia:

- Euthanasia is occasionally performed on the floor of the lobby of the shelter
- The pet owner is allowed to be present to observe the euthanasia procedure,
- The pet owner may be asked to assist shelter staff in restraining the animal for the euthanasia procedure,
- The shelter does not have pre-euthanasia injectable anesthetics to be used in the euthanasia procedure.

**Liability:**

- The floor of the front lobby is not suitable for the euthanasia procedure due to:
  - Inappropriate equipment (table, clippers, restraint devices) may result in injury to the technicians and handlers,
  - Inappropriate environment (cleanliness, lighting, noise, temperature) may result in injury to the technicians and handlers,
  - Staff, volunteers, and the public may enter this area during the procedure and distract the technicians which may result in injury as well as disturb non-employees that inadvertently entered the room,
  - Pharmaceuticals (controlled substance) and medical equipment (needles and syringes) not secured from the public.

- Members of the public, including pet owners, should not be present during the euthanasia procedure due to:
  - The possibility of reflex reactions exhibited by the animals which can be emotionally disturbing and unexpected by pet owners,
  - The possibility of release of excrement by euthanized animals which may be emotionally disturbing and unexpected by pet owners, or cause a potential for injury to members of the public due to slippage to those who are wearing inappropriate footwear,
  - If the animal were to bite anyone before or during the euthanasia procedure, state law requires that the animal be quarantined 10 days or be rabies tested by the County Public Health Laboratory,
  - Once an animal has been delivered to animal control where a procedure is being performed on the animal that requires restraint, only County staff should handle the animal (not the pet owner). The County assumes responsibility for containment of the animal and is potentially liable for any injury inflicted by the animal, particularly to the pet owner while it is in the County's charge.
  - In certain circumstances in order to perform humane euthanasia it may require the injection of pre-anesthetic euthanasia drugs. Lack of availability or use of these pharmaceuticals when indicated may constitute the procedure as inhumane.

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.

**Recommendation:**

- Animals should be euthanized in a designated room (with proper lighting, safety precautions, equipment, security of pharmaceuticals, and controlled substance logs) that is non-accessible to the public.
- Members of the public should not be allowed to be present in the room where the euthanasia procedure is performed.
- Only County staff should be allowed to restrain animals undergoing the euthanasia procedure.
- All County euthanasia technicians should be trained and certified in humane euthanasia procedures, including the proper use of pre-euthanasia anesthetics (including maintenance of controlled substance logs when indicated) and should have them available for use when necessary.

**TS - PSS Finding Eight:** Relinquished/impounded exotic animals, birds, or pocket pets are occasionally housed in the front lobby of the shelter.

**Liability:** The front lobby isn't designed to safely and securely house animals which may result in:

- Members of the public gaining access to animals when staff isn't present in the lobby which could result in escape, public injury or inhumane handling and injury to animals,
- Potential for zoonotic disease (diseases transmitted between animals to humans) transmission (e.g., salmonellosis, psittacosis from reptiles and birds respectively),
- Potential for animals to escape out the entrance of the facility,
- Inappropriate caging, temperature and lighting environments for species with special needs.

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:** Relinquished/impounded animals should not be housed in the front lobby of the shelter. All animals should be placed in species specific appropriate caging with appropriate temperature and lighting controls that propagates a low stress environment. If they can not be placed in an appropriate area of the shelter that is accessible to the public, staff will photograph the animals and post the pictures in the shelter lobby throughout the legal holding period. Members of the public who are interested in adopting these animals will be escorted to the exotic animal holding area and supervised while interacting with these animals.

If the appropriate caging/housing conditions can not be maintained at the shelter, then these animals should be housed off-site at a private veterinary hospital that contracts with the shelter or transported to a rescue organization registered with the County that is qualified to care for that species. Any animal that is currently in the legal holding period and is off-site will have a photograph displayed in the lobby of the shelter for public viewing.

**TS - PSS Finding Nine:** Physical conditions in the dog kennels that require attention:

- Kennel flooring was damaged which exacerbates the possibility for employee or public injury and enhances the accumulation of bacteria despite cleaning efforts,
- Many kennel cage doors are not locked during open hours to the public,
- Kennel cage doors have clear plastic envelopes containing medications for impounded animals which are accessible to the public,

- No leashes, ropes, or Rabies pole is permanently located in the kennel area.

**Liability:**

- Damaged flooring harbors bacteria and is difficult to effectively clean and sanitize resulting in increased opportunity for disease transmission.
- Unlocked Kennel doors increase the risk of citizens entering kennels and interacting with animals of uncertain disposition (possibly aggressive) and increases the possibility of animals being stolen from the facility, or escaping.
- Allowing the public access to medication on kennel doors increases the possibility of ingestion of drugs and resultant side effects (including mild illness and even death in situations of people with allergic reactions to certain medications i.e., Penicillin) and liability to the County.
- When appropriate restraint items are not located directly in areas that house animals, it increases the probability that staff will not be able to take appropriate safety precautions protecting the public, volunteers, or fellow staff in handling animals if a problematic situation would arise.

**Recommendation:**

- Recommended flooring for animal holding areas includes troweled epoxy resin flooring over concrete. This is a long- term flooring surface that is durable, but can also be easily patched if necessary. In the non-animal areas (lobby) the flooring of choice is also the epoxy resin coating over concrete or stained concrete.
- All animal enclosures should be locked whenever the facility is open to the public.
- All medications should be stored in an employee only access area and properly labeled. Any controlled substances should be properly secured and logged. Medications should not be accessible to the public or to volunteers.
- A collection of restraint devices (leashes, ropes and a Rabies pole) should be permanently placed, visible, and easily accessible in the kennel area.

**TS - PSS Finding Ten:** Information collected on owner relinquished animals is not readily accessible to potential adopters.

**Liability:** Historical information on relinquished pets that's not shared with potential adopters may result in issues of public safety:

- If a dog is not good with children and is placed in a household with young children there is a potential for injury to the child,
- If a dog does not get along with other dogs or with cats and is placed in a multi-pet household there is a potential for injury to the animals as well as members of the household who may find themselves in-between the animals during an altercation.

- Animals with unannounced pre-existing problems, may be returned to the shelter post-adoption increasing the possibility that the animal will not be adopted a second time and could be euthanized.

**Recommendation:** Both shelters should use a County approved owner relinquishment form which should be readily available for review (placed in a protective plastic sleeve attached to the cage door with the cage card) by potential adopters.

**TS - PSS Finding Eleven:** General appearance of the shelter needs improvement and clutter needs to be removed.

- Directly outside of the shelter there are two government issued chairs that are rusting.
- The front lobby has a carpet runner that is covered in hair and dirt.
- There is not adequate signage to direct the public through accessible areas of the facility and to prevent them from entering non-accessible areas of the shelter.

**Liability:**

- Old or worn out items like chairs may cause injury to staff or the public if they attempt to use them.
- Relinquished animals are brought to the shelter and placed on the entry carpet runner while they complete the impound process at which time, the runner may become wet or soiled. This can result in a safety hazard where individuals may slip and fall, and dirty floor coverings promote disease transmission to shelter animals as well as may spread zoonotic diseases to staff and the public.
- Without appropriate signage, members of the public may enter areas of the shelter that house aggressive animals posing a safety risk and may gain access to pharmaceuticals/medical supplies.

**Recommendation:**

The poor condition of the building and inanimate objects it contains not only contribute to the public's first impression of the department's professionalism, but may result in public safety concerns.

- The rusted chairs directly outside the entrance to the facility should be removed and replaced by chairs that are appropriate for remaining outdoors and are secured to the facility.
- The worn and dirty carpet runner needs to be cleaned or preferably replaced with a vinyl, non-carpeted entry floor mat which is easily hosed down and soaked in disinfectant per daily cleaning protocols.

- The following professional signage should be obtained and placed in the shelter:
  - Entrance to the facility indicating clerical, animal relinquishment, stray and adoptable animals
  - Entrance to the Dog Kennels (indicating stray and adoptable animals)
  - Entrance to the Cat Room (indicating stray and adoptable animals)
  - No public entry to the bowl washing room on both sides of the door
  - No public entry on the exit door to the outdoor exercise enclosure

Tahoe Shelter Animal Health and Welfare (TS - AHW)

**TS - AHW Finding One:** The Tahoe Shelter does not currently have a full or part-time veterinarian, registered veterinary technician, or animal care staff at the Tahoe location. This results in a reduced level of medical care, behavior observations and assessments, standardized cleaning, sanitation, recognition of disease and isolation for ill animals.

**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.

**Recommendation:** Due to the low number of animals that are impounded on a daily basis to the Tahoe Shelter, it is reasonable to require that all ill animals be transported to a private veterinary hospital that contracts with the County for initial medical care rather than hire a full or part-time veterinarian. The issue of timely disease recognition, transport to a veterinary hospital, and follow up medical care (i.e. administration of prescribed medications, wound care etc.) becomes questionable when staff (veterinary technicians, animal care) is not specifically designated as responsible for these procedures. Hiring preferably a registered veterinary technician (RVT) who would also perform animal care duties (cleaning, sanitation, and feeding) would provide continuity to these tasks, improved accountability, and quality care to impounded animals and could readily report observations and take direction from the Auburn Shelter veterinarian.

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.

**TS • AHW Finding Two:** It was unclear whether or not ACOs at the Tahoe facility were performing screening tests on shelter animals for diseases (parvovirus, heartworm, FeLV/FIV as is the case in Auburn) and based on the results of those tests, making a diagnosis. It was also unclear if ACOs were administering medications (anthelmintics for deworming, vaccine) routinely to animals and acting as unregistered assistants.

**Liability:** Report: Risk Assessment Summary from Site Visit, May 23- 24, 2005 regarding laws associated with RVTs and unregistered assistants practicing veterinary medicine.

**Recommendation:** See, Report: Risk Assessment Summary from Site Visit, May 23- 24, 2005 AHW Finding Two regarding issues of the practice of veterinary medicine.

It was clear that the animal care and animal screening practices are not consistent between the two shelters. The County must develop Policies and Procedures in this area that are followed at both locations.

**TS - AHW Finding Three:** Procedures for cleaning/sanitation are not consistently followed at the Tahoe Shelter. Dogs that present or become ill at the shelter are generally housed in the main kennels and occasionally are isolated in the small enclosures of the bowl washing room.

**Liability:**

Standard kennel operations should 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 that are being consistently followed at the Tahoe Shelter which outline procedures to reduce the spread of disease and limit disease exposure for healthy dogs.

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 moving dogs to the isolation holding area in the bowl washing room, or if ill animals must be housed in the main kennels, reduce exposure to healthy animals (see Report: Risk Assessment Summary from Site Visit, May 23- 24, 2005 AHW Finding Three, Recommendations).

I was told [REDACTED] that the officers who clean the kennels have their own methods (i.e. varying disinfectant dilutions, solution contact times, etc.) and don't appear to follow a standardized procedure. Auburn and Tahoe are both inconsistent in preparing disinfectant dilutions. Placer County Animal Services should have Policies and Procedures that are followed consistently at both facilities.

**TS - AHW Finding Four:** Controlled substance safe contains expired medications (non-controlled substances - i.e., Acepromazine tablets, expiration 2002) that were prescribed by local veterinarians for specific animals that no longer reside at the shelter and are being used on animals currently impounded at the facility.

**Liability:** Shelter staff is illegally practicing veterinary medicine when they utilize prescribed medication for previously impounded animals in order to treat currently impounded animals without the order of a licensed veterinarian.

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.

**Recommendation:** All medications prescribed by local veterinarians for specific animals should only be administered to the animal identified on the prescription label. Any excess medication must be properly disposed of and not stored at the shelter for future use on other animals.

Tahoe Shelter - Occupational Safety and Health in the Shelter (TS - OSHS)  
**TS - 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 work collaboratively with the Auburn shelter employee assigned this project as well as maintenance of the MSDS and IIP programs. Creating the original notebook will be fairly labor intensive.

**TS - OSHA Finding Two:** During the assessment there were numerous concerns regarding employee injury and safety. These observations are specifically identified below as OSHA Finding Three - Four. The liability listed below, generally covers 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.

The following attachments can be found in the attachment section for Report: Risk Assessment Summary from Site Visit, May 23-24, 2005:

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

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

**TS - OSHA 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.

(a) 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 to review the newly developed program.

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

ACO staff often work alone or in secluded areas of the shelter with potentially dangerous animals, handle animals without other staff members present, under wet conditions where they could slip and fall, and in a building that is need of repair to the floors which could directly and indirectly injure employees.

**Recommendation:** Establish safety/communication lines with ACOs in the lobby or in the field by mandating employees working in the rear of the shelter wear radios or walkie-talkies.

Tahoe Shelter - Shelter Supervision (TS - SS)

**TS -SS Finding One:** Due to the small size of the Tahoe Shelter, ACOs and clerical staff may find themselves alone in the facility for extended periods of time, including full eight hour shifts. It is imperative that staff at this facility be well trained, responsible, trustworthy and professional. 



During the site visit, the contractor had no contact with the Supervising ACO who had taken the day off and the second ACO assigned to duty that day was reportedly absent at an off-site meeting for the day.

**Liability:**

Employees that don't work together in the animal control environment and don't follow standardized Policies and Procedures have the potential to endanger or injure themselves, their colleagues and the public.

Members of the public who are unable to identify County staff either by recognizing the County uniform or by viewing a County identification badge worn by an employee, may take direction from non-County employees which could result in a public safety risk (non-employees may inappropriately give approval for entry into areas housing dangerous animals, slippery floors, or storage of pharmaceuticals, needles, and syringes) thereby creating potential liability for the County.

**Recommendation:**

Administrators/Supervisors of Animal Control need to improve the morale of staff regarding teamwork and support between both facilities. If efforts at this level fail, then the County should incorporate assistance from professional County facilitators.

The County should utilize annual Performance Appraisals on seasoned employees to determine whether or not:

- Additional training of standardized County Policies and Procedures is needed,
- Counseling is necessary to support employees who exhibit signs of "burn out" working in the stressful environment of animal control,
- Re-assignment to another facility is indicated,
- Progressive disciplinary action is indicated, or
- Termination of an employee is necessary for the protection of the employee and others he/she may contact.

All County staff should be in designated uniforms when on duty and/or wearing County identification so they can be readily identified by the public who may require assistance. This in combination with strong supervision can have a secondary benefit of raising professionalism and morale.

Tahoe Shelter - Animal Identification (TS - AI)

**TS - 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 the Tahoe shelter, 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 animals are moved within the facility without proper restraint which may result in injury to staff and the public. These circumstances increase 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 County 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

(See the section of this report outlining Information Technology Recommendations).

Development of Animal Identification Protocols is outlined in the Report: Risk Assessment Summary from Site Visit, May 23-24, 2005, Animal Identification Finding One Recommendations, page 15.

**TS - AI Finding Two:** Microchip scanners not found in the facility by the contractor.

- There does not appear to be an official impound area and there was no scanner identified by the contractor in the front lobby of the shelter for scanning animals upon impound.
- There does not appear to be an official euthanasia room and there was no scanner identified by the contractor in the bowl washing room where the ACO reported that some euthanasias are performed. It appears that animals are not scanned prior to being euthanized.

**Liability:**

Animals must be scanned prior to euthanasia pursuant to:

Food & Ag 31108. Dogs: Impound Holding Period and Food and Ag 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)

**Recommendation:** Microchip scanners must be kept at the shelter and each animal must be scanned at initial entry to the facility and at final disposition (adoption or euthanasia). It is important that official sites for impounding and performing euthanasia be established and that microchip scanners be located there and used at the Tahoe Shelter.

**TS - AI Finding Three:** Cat Cage Cards were not affixed to cat cages. In addition, empty cat cages that served as permanent housing for cats did not have signage indicating where cats were temporarily located (either placed in group housing/exercise area or interacting with potential adopters).

**Liability:** All cages housing animals must have cage cards affixed to the cage door that have matching animal impound numbers corresponding to external identification worn by the animals in order to prevent mistaken euthanasia.

**Recommendation:** Remove individual cat cage cards from the cork board in the cat room and affix cards to the cage doors of each respective cat. Utilize professional signage that indicates that cats are temporarily out of their permanent enclosures, but will soon be replaced (i.e., they have not received a final disposition).

**TS - AI Finding Five:** 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 ACO 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.