Animal Care Services: Phase Two

Audit found all core ACS functions understaffed, and recommends City to: a) work on possible improvements now, b) review resources and maximize revenues, and c) align them with priorities in forthcoming strategic plan.
Highlights: Animal Care Services Review

With an annual budget of $5 million, Animal Care Services (ACS) cares for 8,000 animals per year, providing a vital role in the community. Stakeholders agree ACS can improve its operations and services provided to animals. To make improvements now and in moving forward, ACS and the City need to take a three-prong approach to address the 186 recommendations in the City Auditor’s Office two-part report.

1. Implement Standard Operating Procedures to Improve Core Functions

Animal care tasks are performed inconsistently, so ACS needs to immediately implement standard operating procedures and training in all areas, such as:
- Daily animal feeding and cleaning
- Veterinary services
- Adoption procedures

2. Develop a Shared Vision and Strategic Plan to Guide and Set Priorities

Service priorities are not aligned with stakeholders’ expectations, so ACS needs to develop a shared vision and strategic plan to guide ACS and address the most critical issues affecting day-to-day operations. The strategy should address high-priority issues and long-term objectives, including:
- Operating agreement with spcaLA to define key roles, such as responsibilities in adoption programs
- Protocol to develop a plan for each animal to expedite needed services and movement through the shelter to the best outcome
- Process for working with rescue groups to more quickly identify and move animals into placement
- Enhanced foster program and robust volunteer program with dedicated coordinators in each program

3. Review Resources and Maximize Revenue to Align with Priorities

A lack of resources, including limited staffing levels, has resulted in ACS operating beyond its capacity. Once a vision and strategy are established, the appropriate resources should be aligned with service goals and objectives. The following areas were identified to have limited staffing:

- VETERINARY SERVICES: The Medical Team’s staffing level cannot keep up with its significant workload.
  - Animals to Vet per Day:
    - Other Shelters: 170
    - ACS: 235

- ANIMAL CARE: Staffing levels do not allow for minimum care requirements - including properly feeding animals and cleaning their housing - to be met.
  - Time Spent on Feeding and Cleaning per Animal:
    - Min. Requirement: 15 minutes
    - ACS: 6 minutes

- RE-HOMING ANIMALS: ACS has less staff for adoptions when compared to other shelters.
  - Animals to Adoption Staff Member per Year:
    - Other Shelters: 1,923
    - ACS: 2,716

- ANIMAL CONTROL: Response times to high priority calls are above the 20 minute ACS goal, likely due to staffing levels and/or scheduling.

- VOLUNTEER PROGRAM: ACS lacks a robust volunteer program to provide needed support in almost all shelter functions.

- CITATIONS: Limited collection efforts of outstanding citations issued by ACS resulted in almost $1 million in uncollected fines since 2009.

- ANIMAL LICENSES: Even though ACS had a license compliance rate comparable to other shelters, an increase of 8% could generate an additional $262,000 each year.

- CONTRACT RATES: Outdated contract rates did not allow ACS to recover costs for animal care services provided to neighboring cities.

ACS Management’s Response

Management has taken steps to address the 186 recommendations from both Phase 1 and 2. A one-time allocation of $50,000 was approved by the City Council to assist with addressing the recommendations. ACS will be using these funds to hire a consultant to work with the ACS staff, the newly formed Mayor’s Shelter Task Force, and other key stakeholders to create a vision and strategic plan.

For the full report, please visit: CityAuditorLauraDoud.com
Long Beach City Auditor’s Office
Website: CityAuditorLauraDoud.com | Telephone: 562-570-6751
Like us at facebook.com/LongBeachCityAuditor | Follow us on Twitter @LBCityAuditor
CITY AUDITOR’S FRAUD HOTLINE 1-888-FRAUD-07
# Table of Contents

**Executive Summary** ................................................................................................................. 1

**Issues & Recommendations** ................................................................. 3

**Shelter Staffing Shortages** .................................................................................................. 3

  - **Finding #1** The Volunteer Program is not maximized to assist ACS service delivery. .............................................................................................................. 4

  - **Finding #2** There are not enough Animal Care Attendants to meet the minimum care requirements needed to properly feed the animals or clean their housing. .............................................................................................................. 5

  - **Finding #3** There are not enough Animal Control Officers to meet basic coverage requirements. .............................................................................................................. 7

  - **Finding #4** ACS is below the peer average for veterinary staff per animal. .......... 9

  - **Finding #5** ACS is below the peer average for staff dedicated to life-saving programs. .............................................................................................................. 10

**Organizational Culture** ....................................................................................................12

  - **Finding #6** ACS staff morale is low, as employees cited overall job dissatisfaction, poor communication, and insufficient time and resources. .............................................................................................................. 12

**Other Areas Reviewed** ....................................................................................................13

  - **Finding #7** ACS is not fully recovering the cost for services that it provides to neighboring contract cities. .............................................................................................................. 14

  - **Finding #8** Almost $1 million in citations have not been collected since 2009. .... 15

  - **Finding #9** The animal license compliance rate is comparable to those of benchmarked cities, but increasing the number of licensed animals would improve ACS’ cost recovery. .............................................................................................................. 15

  - **Finding #10** Vaccination and pet license data are not entered timely in the Chameleon system. .............................................................................................................. 17

  - **Finding #11** It is unclear if the License Canvassing Program is effective. .... 17

**Background** ......................................................................................................................... 19

**Objective, Scope, and Methodology** ..................................................................................... 20

**Management Response** ...................................................................................................... 21
Executive Summary

Background

The Animal Care Services Bureau (ACS), under the Department of Parks, Recreation, and Marine (PRM), provides animal sheltering, pet licensing, and law enforcement field services throughout Long Beach and four surrounding cities: Cerritos, Seal Beach, Los Alamitos and Signal Hill.

ACS is an open intake shelter, as no animals under its jurisdiction can be turned away. The shelter impounds approximately 8,000 live animals each year. For fiscal year 2018 (FY18), ACS has an operating budget of approximately $5 million, which includes funding for a staff of 51.2 full-time equivalents (FTEs).

The City Auditor’s Office (CAO) completed a two-part review of ACS at the request of Mayor Robert Garcia. The review was centered around ACS operations and the extent to which policies and procedures are effective when compared to industry standards and best practices.

Phase One

For the Phase One Review, the CAO hired JVR Shelter Strategies (JVR), an animal shelter management consulting firm, to review shelter operations, including animal intake, veterinary services, and programs designed for positive animal outcomes. The Phase One report was released in December 2017 and included 173 wide-ranging, comprehensive recommendations on day-to-day shelter operations and management, as well as long-term planning strategies.

A key overarching recommendation of Phase One is the need for ACS to develop a clear, shared vision and strategic plan. JVR concluded that stakeholder expectations and ACS’ capacity are not aligned. ACS attempts to provide service levels beyond what staffing and resources would allow, affecting the overall quality and effectiveness of services.

In addition, JVR found that ACS had limited standard operating procedures, leading to inconsistent decision-making and conflicting shelter practices. The consultant concluded that a cohesive management approach is needed. Phase One recommendations resulted in the establishment of the Mayor's Shelter Task Force, and a one-time allocation of $50,000 to assist with addressing the recommendations.

Phase Two

Completed by the CAO, the Phase Two Audit focused on ACS staffing levels and included an assessment of key revenue generating operations. As part of Phase Two, to identify standards and best practices, the CAO conducted a benchmark analysis comparing ACS to seven municipal animal shelters. Phase Two confirmed that ACS, when compared to industry standards and/or other
municipal shelters, is understaffed in certain core functions involving basic animal care, veterinary care, public safety, and programs aimed at moving animals out of the shelter, like adoptions and rescue placements. Inadequate staffing resources at ACS have likely grown over time, as ACS shifted away from providing primarily “animal control” services to expanding “life-saving” programs but with minimal funding for additional staff resources to support this expansion. Once a vision and strategy are established, the appropriate resources should be aligned with service goals, priorities and objectives.

Phase Two also found that more effective management of revenue-generating operations could allow for much needed additional funding, and that low morale among staff is potentially impacting organizational goals. By taking different approaches, ACS could maximize licensing and citations revenues, as well as recover costs for services provided to neighboring cities. In addition, to augment existing shelter funding, PRM management should also seek alternative approaches to maximize and utilize new resources and outside support.

Both phases of the review underscored the need for ACS to immediately implement many of Phase One’s short-term recommendations. These recommendations would improve shelter management and operations, regardless of whether additional resources are provided. The City’s budget forecasts for the coming years project deficits requiring Citywide budgetary cuts, including to PRM, in which ACS is housed. Many of the recommendations provided in both reports are not dependent on additional funding or staffing resources.

In conclusion, to ensure animals receive the proper level of care and to increase live release rates, PRM Management must streamline processes and implement industry standards and best practices as recommended in both phases of this review. Implementing these comprehensive audit recommendations could address many of the issues and concerns raised by ACS personnel that have affected low employee morale and job dissatisfaction.

We want to thank the ACS staff for their assistance, patience, and cooperation during this audit.
Issues & Recommendations

To gain an understanding of how ACS compares to other municipal shelters, we assessed several key statistics summarized in Figure 1 below. ACS has made noteworthy strides in the past five years in improving live-release rates. However, when compared to eight other municipal shelters, ACS is slightly below average for live animal outcomes, with a live-release rate of 72%, compared to the benchmark average of 75%.

![Figure 1. Municipal Animal Shelter Comparison 2016](image)

It should be acknowledged that this benchmarking comparison has its limitations, as there can be wide variation among these municipal agencies with respect to the services provided, staffing and management approaches, as well as budget allocations. Shelters could service animal and human populations with different needs; enforce different, city-specific animal related laws; incur different shelter maintenance costs; and perform tasks that other shelters do not, such as answering citizen calls for service in-house, rather than outsourcing that duty to another department.

The analysis in this report can provide ACS and City management with information to support future strategic planning processes and decision-making surrounding resource allocations and programmatic priorities.

Shelter Staffing Shortages

More recently, ACS has shifted its model from providing animal control services as it was originally established, to providing animal care and placing greater emphasis on life-saving programs. As a result, programming has expanded to provide these services, yet minimal funding for additional staff has been added, leading to inevitable challenges for ACS. Based on a staffing analysis of core shelter functions, at a minimum 12 additional staff are needed in various shelter roles.

Due to current Citywide budget constraints, it is unlikely that ACS will be able to hire the additional staff to fill the shortages highlighted in this report. First, the City needs to consider shifting ACS resources to meet new priorities as determined by the planned strategic planning process.
Secondly, the City should commit to building a robust volunteer program that could help augment current staff and alleviate staffing shortages, while fostering a stronger, collaborative relationship with the community.

**Finding #1**  
*The Volunteer Program is not maximized to assist ACS service delivery.*

A well-established volunteer program can effectively integrate and utilize volunteers in core ACS functions to help augment existing ACS personnel and allow them to focus on higher-order tasks. Experts have found that an organization is more likely to secure higher levels of volunteer engagement when the volunteer program is well-managed, and when volunteers are provided with opportunities to assume meaningful responsibilities and to make valuable contributions.

Currently, the ACS volunteer program is not effective in maximizing the volunteer potential of Long Beach residents to provide needed support in the care of animals. Figure 2 shows that ACS, when compared to six peer shelters, ranks last in the use of volunteers.\(^1\)

### Figure 2. Volunteer Hours Comparison 2016

<table>
<thead>
<tr>
<th>Shelter</th>
<th>Volunteer Hours Worked</th>
<th>Full Time Employee Equivalent of Volunteer Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sacramento</td>
<td>97,147</td>
<td>46.7</td>
</tr>
<tr>
<td>San Francisco</td>
<td>27,241</td>
<td>13.1</td>
</tr>
<tr>
<td>San Jose</td>
<td>19,200</td>
<td>9.2</td>
</tr>
<tr>
<td>Denver</td>
<td>16,025</td>
<td>7.7</td>
</tr>
<tr>
<td>Rancho Cucamonga</td>
<td>12,000</td>
<td>5.8</td>
</tr>
<tr>
<td>Riverside: San Jacinto</td>
<td>7,470</td>
<td>3.6</td>
</tr>
<tr>
<td>Long Beach</td>
<td>6,094</td>
<td>2.9</td>
</tr>
</tbody>
</table>

ACS volunteer logs indicated that 2016 total ACS volunteer hours were 6,094, almost 16 times fewer than Sacramento’s total volunteer hours (97,147). If these volunteer hours were converted to employee hours, this comparison is equivalent to ACS and Sacramento having 2.9 FTEs and 46.7 FTEs, respectively. While not included in the volunteer hours shown above, it was observed that the Society for the Prevention and Cruelty of Animals’ (spcaLA) volunteers assist with some ACS duties, particularly showing adoptable ACS animals.

Currently, there is only one part-time staff member dedicated to managing the ACS volunteer program. The Phase One report concluded that a full-time Volunteer Coordinator is needed to effectively develop and coordinate a large, well-functioning program. Shelters that reported having one or more full-time staff members dedicated to their volunteer programs also had higher levels of volunteer engagement.

ACS’ limited use of volunteers can partially be attributed to limited staffing to run the program, but lack of structure and volunteer requirements are likely

---

\(^1\) San Diego Central Shelter did not provide information related to volunteer hours.
contributing factors. Currently, ACS does not schedule volunteers according to
designated shifts or require minimum volunteer hours. ACS also limits the
volunteers’ roles primarily to cleaning, socializing, and occasionally helping with
off-site events.

According to our review of best practices, volunteers should not be limited to
assisting with minor duties, but rather used in all functions that are legally allowed.
The benchmarked shelters provided more opportunities for volunteers and better
structure around the volunteer program. Examples include:

- San Francisco requires volunteers to commit to a minimum two-hour shift per
week for at least six months. Volunteers work in almost any role in the shelter
including administrative duties (filing, organizing supplies, data entry, etc.), and
veterinary support (holding animals during procedures, medicating animals,
and helping with general duties).

- San Jose requires a minimum commitment of three hours per week for at least
four months. Like San Francisco, volunteers are assigned to various roles,
such as assisting with license administration (opening mail, filing, and data
entry) and veterinary clinic administrative and assistant duties (cleaning and
prepping instruments, assisting pre-and post-surgery, and restocking).

Recommendations:

1.1 Phase One provided many recommendations regarding the development
of a volunteer program, some of which include dedicating one full-time
employee to volunteer program management, recruitment and training.

Finding #2 There are not enough Animal Care Attendants to meet the minimum care
requirements needed to properly feed the animals or clean their housing.

The National Animal Care and Control Association (NACA) and the Humane
Society of the United States (HSUS) recommend a minimum of 15 minutes of care
time per day for feeding and cleaning each animal housed in a shelter. Based on
this requirement, ACS is understaffed by 58%, making it difficult for staff to meet
the 15 minutes of recommended care.

ACS Animal Care Attendants (ACA) are responsible for the daily care and
processing of animals upon intake. These duties consist of cleaning kennels,
providing the animals with bedding, food and water, and performing intake duties
such as deworming, administering vaccinations, entering information in the
Chameleon system, and placing animals in a kennel. At the time of the audit, the
Animal Care team was made up of two full-time and six part-time ACA positions.

As shown in Figure 3, the number of animals coming into and staying at the shelter
can fluctuate throughout the year. In calendar year (CY) 2016, daily averages show

---

2 NACA and HSUS’ 15 mins. of minimum care is based on 9 mins. for cleaning and 6 mins. for feeding per animal.
3 Chameleon is an integrated shelter case management system that provides shelter management, licensing, field
operations, cashiering, and veterinary record keeping.
ACS experienced the highest levels of daily intake between the months of April and August, and anywhere between 136 to 317 animals in the shelter at any given time.

Figure 3.
Daily Average Animal Intake & Population
CY 2016

After deducting the time reserved to perform intake duties, we estimated that with current staffing levels, animals are receiving approximately 6 minutes of care on average per day throughout the year. When the daily population of animals exceeds a shelter staff’s ability to provide care, service ineffectiveness and problems are inevitable. Lapses in care can have adverse effects on the health and well-being of animals, increase the risk of disease, and add considerable stress on shelter staff.

An additional eight full-time ACAs (or 12 part-time) are needed to provide the recommended level of care. An additional eight full-time ACAs (or 12 part-time) are needed to provide the recommended level of care. 4 Staffing should be coordinated and deployed to reflect service needs throughout the year (as shown in Figure 3) to make the most effective use of available staff time and resources. The difference in recommended care time and the ACS staffing time provided is shown in Figure 4.

4 The use of volunteers was not included in this analysis. While volunteers may assist with these duties, they are not formally scheduled and staff indicated that volunteers cannot be relied on to perform these tasks daily. Factoring in the use of volunteers would increase the care time provided to animals.
Finding #3  **There are not enough Animal Control Officers to meet basic coverage requirements.**

Animal Control Officers (ACO) are responsible for enforcing City ordinances and state laws that apply to animals, retrieving and transporting stray, sick, injured and deceased animals, and responding to citizen calls related to animal concerns or complaints. Although there is not a universally-accepted method for determining the number of ACOs needed in any given jurisdiction, NACA provides a model that is commonly used. The model provides a method for calculating staffing needs to ensure constant coverage for each desired officer position. Based on NACA’s field officer staffing model, an additional 4.1 full-time ACOs are needed to have an adequate number of staff to provide full patrol coverage.\(^5\)

Field services are provided by ACOs 24 hours per day, seven days per week, throughout Long Beach, Cerritos, Seal Beach, Los Alamitos, and Signal Hill. The service area, shown in Figure 5, is divided into five “beats.” Ideally, ACS would like to schedule at least one ACO per beat per work shift: morning, afternoon, and graveyard. During the audit, ACS had 11 full-time and two part-time ACO positions.

---

\(^5\) This does not include coverage of the graveyard shift. An additional 1.6 officer would be needed to cover the graveyard shift every day of the year. ACS Management has indicated it would like to move to an “on-call” shift instead of staffing a full-time officer from the hours of 11:00 pm-7:30 am.
In our assessment of a two-week schedule, we noted the following deficiencies related to coverage of services areas:

- One ACO covers two beats – East Long Beach and Cerritos, Los Alamitos, and Seal Beach – on Saturday and Sunday mornings.

- North and West Long Beach beats are covered by one ACO on Monday and Tuesday afternoons.

- No ACO is assigned to South Long Beach on Mondays and Fridays.

**Responding to Citizen Calls for Service**

When citizen calls for service are received by ACS, they are input into the Chameleon system and classified as one of six priority levels. Each priority level has a Bureau-set time goal for an ACO to respond to the scene of the call. Priority 1 ("human at risk") and Priority 2 ("animal at risk") calls are the most critical, and have a 20-minute response time goal. The audit’s assessment of available call data shows that understaffing may be attributing to delays in responding to citizen calls for service.

As shown in Figure 6, ACS does not always meet response time goals, as the response times for 58% of Priority 1 and 65% of Priority 2 calls were above the ACS 20-minute threshold (average response times were 29 minutes and 40 minutes respectively). Delayed response to calls may increase the likelihood of human or animal-related emergencies that are hazardous to citizens or to other animals.
We could not identify any industry standard for an appropriate response time goal or threshold. Assuming the response time goals set by ACS are reasonable and the process for responding to calls is efficient, these results demonstrate a lack of adequate staffing, based on the volume of work, to meet the ACS expectation.

Finding #4  
**ACS is below the peer average for veterinary staff per animal.**

We were unable to identify an industry standard staffing model used to assess veterinary shelter staffing levels, mainly because of the varying onsite services offered at shelters. However, the *Guidelines for Standards of Care in Animal Shelters* by the Association of Shelter Veterinarians states that “adequate staffing must be available to ensure that each critical point of service (e.g. vaccination or medical evaluation, spay/neuter surgery, or a physical move to adoption) is delivered promptly. Delays resulting in even one or two additional days of care may result in crowding and poor animal welfare in facilities that operate near maximum capacity.”

ACS maintains on-site veterinary services with a Medical Team made up of two part-time veterinaries, two full-time registered veterinary technicians, and two part-time veterinary technician assistants. The Team is responsible for veterinary care at the shelter, including examination and triage of sick and injured animals, surgeries, vaccinations, administration of medication, and administrative duties.

A benchmark survey of seven peer shelters provided best practices and insight into appropriate or comparable staffing levels. As shown in Figure 7, benchmark results found that ACS has one of the higher ratios of animals to medical staff when...
compared to peer shelters. This suggests that ACS has a smaller veterinary staff than most peer shelters when compared to each shelter’s daily animal population.

**Finding #5**

**ACS is below the peer average for staff dedicated to life-saving programs.**

ACS’ Rehoming Team is responsible for coordinating adoptions, rescue and foster care, behavioral treatment, and animal enrichment – all considered life-saving functions. Another function of the re-homing team is coordinating the volunteer program which we analyzed separately from these core life-saving duties. The Team is currently comprised of one full-time and three part-time staff members.

Like the Medical Team staffing analysis, we compared ACS staffing for re-homing functions to the same seven peer shelters. As shown in Figure 8 below, benchmark results found that ACS has the 2nd highest ratio of incoming animals to rehoming...
staff, suggesting that ACS has fewer staff than peer shelters for functions related to re-homing and rehabilitation of animals. While the San Jose shelter has a larger animal to staff ratio, it also has over three times the volunteers (as shown previously in Figure 2) that could be assisting paid staff with rehoming efforts.

**Figure 8.**
**ACS Rehoming Team Staff Comparison with Peer Shelters:**
*Annual Animal Intake Per Staff*

![Graph showing annual animal intake per staff for various cities including San Jose, Long Beach, Riverside: San Jacinto, San Diego: Central, Sacramento, Denver, Rancho Cucamonga, and San Francisco.]

Currently, ACS does not have a foster program and, based on the consultant’s recommendations from Phase 1, it is likely unfeasible to run a full-functioning foster program at current staff levels.

When staff dedicated to key life-saving functions is limited, it hinders a shelter’s ability to find homes for animals in a timely manner or divert them out of the shelter. As the *Guidelines for Standards of Care in Animal Shelters* states, delays in behavioral evaluations, transfer to rescue, or movement to adoptions can have a detrimental effect on an animal’s health. Increasing the time animals spend waiting in the shelter contributes to further crowding, exposure to disease, elevated levels of stress, and reduced welfare.

**Staffing Recommendations:**

*Given our findings in this area, we are calling attention to these specific recommendations from Phase One:*

1. **City stakeholders must determine what kind of shelter it wants ACS to be and then ensure the Bureau has the resources and/or operations necessary to produce desired outcomes. This includes not only reviewing and increasing staffing levels accordingly, but also operating according to sound business practices.**

2. **Implement pathway planning and developing relationships with medical foster groups to move animals out of the shelter as quickly as possible.**
New Phase Two recommendation:

2.3 Analyze Chameleon calls for service data by day, time of day and beat, and compare it to the current beat “patrol” structure and ACO scheduling. Beats and scheduling should be aligned with call volume and time to ensure optimal coverage and better response times.

Organizational Culture

During the preliminary stages of the audit, the CAO audit team noted that ACS employee morale appeared to be low and, therefore, our Office conducted an employee satisfaction survey to verify our observation and to glean any insight for our audit.

Finding #6 ACS staff morale is low, as employees cited overall job dissatisfaction, poor communication, and insufficient time and resources.

Out of 58 ACS employees, nearly four out of five (78%) responded to the survey comprised of 83 questions that measured employee perceptions and satisfaction across four key categories. Figure 9 indicates low staff morale among ACS personnel, as 58% of respondents were dissatisfied with their jobs.

Employees cited poor communication, feelings of being overworked and treated unfairly, and a lack of buy-in with overall shelter goals and vision. Low morale can impact organizational goals, result in low productivity, and increase employee turnover, which can be alarming given that the animal sheltering environment inherently carries a high risk of employee burnout.

Figure 10 on the next page shows the highest and lowest scoring questions for each category surveyed.
Figure 10.
Examples of High and Low Scoring Employee Survey Responses

Recommendations:

3.1 Examine the current culture at ACS and determine the areas in greatest need of improvement to increase employee morale. Focus on finding ways to increase employee satisfaction and engagement such as: recognition programs, advanced training, and providing quality feedback.

3.2 Implement Phase One recommendations to develop a strategic plan that can provide a clear vision and direction for the organization, and to establish standard operating procedures to guide day-to-day operations and management.

Other Areas Reviewed

Supplementing the review completed by the consultant in Phase One and our assessment of staffing levels in Phase Two, we assessed key ACS revenue sources to identify areas for improvement. Overall, it was determined that better management oversight is needed to maximize license and citations revenues, as well as to recover the costs for services provided to neighboring cities.
Finding #7  **ACS is not fully recovering the cost for services that it provides to neighboring contract cities.**

For the past 25 years, ACS has provided various services, including sheltering, impounding, and responding to calls for service to the cities of Cerritos, Los Alamitos, Seal Beach, and Signal Hill. Annual contracts with these cities establish parameters surrounding the services ACS provides and a compensation schedule based on a “Total Cost Allocation Model”, which allows the cities to pay their respective share of ACS’ total budget. Figure 11 shows the FY 2017 contract amounts for each City totaling $644,578, as well as the percentage of services ACS provides to each when compared to ACS total volume of work.

**Figure 11.**

<table>
<thead>
<tr>
<th>City</th>
<th>Contract Value</th>
<th>% of Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cerritos</td>
<td>$319,806</td>
<td>9.2%</td>
</tr>
<tr>
<td>Los Alamitos</td>
<td>$88,464</td>
<td>2.4%</td>
</tr>
<tr>
<td>Seal Beach</td>
<td>$158,190</td>
<td>4.4%</td>
</tr>
<tr>
<td>Signal Hill</td>
<td>$78,118</td>
<td>2.3%</td>
</tr>
</tbody>
</table>

To review ACS’ cost allocation model, we asked management to provide supporting documentation for current contract values. Management provided the spreadsheet used to calculate contract values, but could not provide the Chameleon reports to support the allocation amounts derived. Retaining documentation that supports contract values is important in case the contract is challenged in the future.

Analysis of the cost allocation model found that, at a minimum, an additional $70,000 could be recovered from these cities each year. This forfeited amount could cover the cost of at least one full-time employee. Contract values were understated because the existing cost allocation formula did not utilize proportionate share of field services, citizen calls for service response, or administrative costs.  

Additionally, all four contracts specify a 2% contract increase based on the Consumer Price Index that we believe is not appropriate for the nature of the services provided. To ensure that the City is not inadvertently subsidizing the services provided to the contract cities, any cost increase should be based on actual cost of services provided to the contract cities.

**Recommendations:**

4.1 To fully recover costs, revise the formula used to calculate contract values to include proportionate share of field services and administrative costs. Update contract service costs to reflect changes in services provided each year.

---

ACS Management was informed of these issues during the audit and has since updated contracts with all four cities to recover costs for services provided.
4.2 Maintain documentation in a manner that supports accurate contract values.

**Finding #8**  
*Almost $1 million in citations have not been collected since 2009.*

Per the Long Beach Municipal Code, ACS can issue administrative citations to the public for animal-related violations including, but not limited to, expired or no pet license, dog off leash, and spay/neuter violations. Citations are considered a ‘civil penalty’ and the related fines are defined in the City’s Fee Schedule.

Our assessment of available citation information found that ACS had collected 13% of total outstanding citation dollars, leaving almost $938,000 in uncollected revenue since 2009. This can partially be attributed to limited collection efforts performed on unpaid citations. ACS sends delinquent notices at 30, 60, 90, and 120 days past due, but does not send delinquent accounts to collections.

While the Department of Financial Management (FM) has a Billing and Collections Division that can be utilized, ACS management stated that the Bureau does not forward delinquent citations to FM due to limited staffing to gather the information FM needs to perform collection efforts. After 4 years, a citation reaches its statute of limitations and can no longer be collected. Therefore, of the $1 million in uncollected citations, only those issued after 2014 or $362,463 can still be collected.

**Recommendations:**

5.1 Utilize FM or an external collection agency to collect unpaid administrative citations.

5.2 Use Chameleon to monitor and track the payment of administrative citations. After implementing further collection efforts, determine if the additional revenue received offsets the cost.

**Finding #9**  
*The animal license compliance rate is comparable to those of benchmarked cities, but increasing the number of licensed animals would improve ACS’ cost recovery.*

ACS’ main revenue source is animal license fees, which totaled almost $1 million in FY17. Animal licenses are required by law for all dogs in Long Beach and contract cities, and for all cats in Long Beach. License fees are set by each jurisdiction and enforced by ACOs and License Canvassers. Licensing laws are purposed towards protecting the public’s health and incentivizing responsible pet ownership.

Based on our estimate of the City’s population, approximately 21% of dogs and...
4% of Long Beach cats are licensed.\textsuperscript{9} As shown in Figure 12 below, the City’s pet license rate is at least comparable or slightly above peer shelters.

Throughout the industry, license compliance is a constant issue and it is understood that 100% compliance is unrealistic. However, if ACS were to increase compliance from 21% to 29%, an additional $262,000 in license revenues could be collected each year. Below are examples of best practice methods that ACS could employ to potentially increase license compliance rates:

- Send email notification of upcoming license renewals.
- Offer auto-renewal of license.
- Offer a pet amnesty month in which owners who license their pets are not penalized or fined.
- Require external veterinarians to submit vaccination data which can alert ACS to the need for new licenses.
- Place inserts with City utility bills to inform residents of license and vaccinations requirements.

**Recommendations:**

6.1 Work towards increasing the license compliance rate by at least 8% by expanding collection and public outreach efforts.

6.2 Require Long Beach veterinarians to submit vaccination information to the City monthly per the Long Beach Municipal Code.

\textsuperscript{9} The American Veterinary Medical Foundation uses a formula to estimate the pet population in each community. This formula uses pet ownership statistics such as percentage of households owning a dog/cat, average number of dogs/cats owned per household, and the number of households in the community.
Finding #10  
**Vaccination and pet license data are not entered timely in the Chameleon system.**

The audit found six months of vaccination records from outside vets and 255 pet license payments of $7,100, were unprocessed and backlogged.

License fees are remitted to ACS through the mail or over the counter and placed in a safe until they can be processed by Bureau staff. Various staff members indicated that license paperwork is consistently backlogged for weeks or months at any given time, due to limited staffing for processing. When a visual inspection was conducted during the audit, 255 license payments received in the mail had not been deposited. These represented approximately $7,100 in unprocessed license revenue.

In addition, we observed up to six months of vaccination records received from outside veterinarians that had not been entered into the Chameleon system. Per City Administrative Regulation (AR) 21-1, all monies exceeding $100 are required to be processed within 24 hours of receipt. This has been an ongoing issue noted in CAO audits previously conducted in 2011 and 2014. Delays in processing licenses are detrimental to effective and efficient operations. Without having current data, ACS may not have current contact information for owners of lost pets or updated vaccination information.

**Recommendations:**

7.1 Enter license and vaccination data timely, within 48 hours, and deposit payments in adherence to AR 21.1.

7.2 As stated in Phase One, consider outsourcing the processing and collection of animal licenses.

Finding #11  
**It is unclear if the License Canvassing Program is effective.**

A component of the animal license program is door-to-door canvassing with the intended purposes of enforcing pet license laws, and verifying that vaccine requirements are met. The Canvassing Team is comprised of one full-time and six part-time staff members who are tasked with going door-to-door to locate unlicensed pets and to educate the public on the benefits of pet licensing.

Inadequate record-keeping makes it difficult to justify continuation of ACS license canvassing efforts.

The canvassing program as it currently operates is inadequately managed and information is not available to assess the success of the program. ACS should determine whether continuing the canvassing adds value, and meets the purpose and goals of the licensing program. The following issues were noted by our audit surrounding the canvassing program:

- Locations for daily door-to-door canvassing are, at times, selected at random instead of focusing on areas of low compliance.

- The canvassing program does not have specific goals, such as targeted numbers of new licenses or residents to visit per week or month.

- Recorded data related to canvassing activities was unclear, inconsistent
and incomplete, making it impossible to track or determine program effectiveness.

- Reports are not available or used to analyze canvassing activity for a designated time period or to gauge the additional revenue generated by the program.

While the canvassing program might add value by bringing in additional license revenue, ACS management cannot quantify or measure the benefits of canvassing activities. Of the peer shelters surveyed, five of the seven do not perform regular canvassing efforts to find unlicensed animals. Many agencies noted that the cost outweighed the benefits of a canvassing program.

**Recommendations:**

8.1 Determine if license canvassing is cost beneficial, which includes the consideration of shifting canvassing staff positions to other shelter service areas or functions that are prioritized or may add more value.

**If ACS chooses to continue the canvassing program:**

8.2 Create performance goals.

8.3 Implement a systematic process of selecting locations to canvass. This could include low compliance areas or areas that are densely populated.

8.4 Utilize Chameleon to track canvassing in a way that will allow reports to be generated and reviewed to assess the effectiveness of the program.
Background

Animal Care Services (ACS) is a Bureau within the Department of Parks, Recreation, and Marine and is responsible for providing sheltering and veterinary services for lost or homeless animals, pet licensing, responding to animal-related emergencies, and enforcing laws pertaining to animals and their care. ACS’ stated vision is to become California’s safest large city for people and animals through a proactive strategy of community engagement and enforcement activities.

For the past 16 years, ACS has partnered with the Society for the Prevention of Cruelty of Animals, Los Angeles (spcaLA) to jointly deliver adoption services to Long Beach and four contract cities: Cerritos, Seal Beach, Signal Hill, and Los Alamitos. Both ACS and spcaLA are housed on the same campus at the P.D. Pitchford Companion Animal Village; however, they maintain separate leadership and identities.

ACS staff serve an estimated 295,000 dogs and cats per year with an annual budget of $5 million. ACS has continued to improve overall live outcomes for Village animals. Figure 13 below shows ACS’ live release rates from 2001-2017.

In January 2017, the Mayor requested that the City Auditor’s Office (CAO) initiate a review of ACS operations with the purpose of finding ways to build on the impressive gains made in recent years. The CAO initiated the review in April 2017 and released the Phase One report in December 2017, which included 173 recommendations on day-to-day shelter operations and management, as well as long-term planning strategies. This Phase Two report concludes our audit of ACS operations.
Objective, Scope, and Methodology

The objective of Phase Two of the Animal Care Audit was to assess ACS staffing levels and management of key shelter resources. The audit scope covers current shelter operations, and encompasses shelter data from CY 2016. To achieve this objective, we:

- Conducted site visits and interviewed ACS staff and management to understand key processes and controls related to the audit objective;
- Benchmarked seven comparable animal care agencies to identify best practices related to staffing, resource allocation, and performance standards. These agencies were the City of Rancho Cucamonga, Riverside County’s San Jacinto Shelter, City of Sacramento, San Diego County’s Central Shelter, City of San Francisco, City of San Jose, and City of Denver;
- Analyzed current staffing levels for kennel care, medical care, rehoming, and field operations in accordance with industry best practices to determine if they appropriately meet the demands of the shelter;
- Conducted a survey of all ACS staff to examine the organization’s current culture and employee morale;
- Reviewed procedures surrounding the processing of license and vaccination paperwork;
- Assessed the City’s compliance rate of licensed dogs and cats;
- Quantified the amount of uncollected administrative citations;
- Reviewed the controls and outcomes of the canvassing program to determine program effectiveness;
- Reviewed ACS’ agreements with the four contracting cities for content, terms, and requirements;
- Evaluated the appropriateness of the cost allocation methodology for services provided to the contracting cities; and
- Verified the accuracy of payments received by the contracting cities for services performed.

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.
Management Response
Date: August 6, 2018
To: Patrick H. West, City Manager
From: Gerardo Mouet, Director of Parks, Recreation and Marine
For: Laura L. Doud, City Auditor
Subject: Animal Care Services Review – Phase Two

The Department of Parks, Recreation and Marine (PRM) would like to thank the City Auditor and staff for their time and effort in conducting a review of the Animal Care Services Bureau’s (ACS) staffing and revenue-generating operations. We truly appreciate the dedicated staff from the Auditor’s Office for taking the time to understand the ACS operation, and for conducting the review in a professional, productive, and collaborative manner.

PRM agrees with the recommendations contained within Phase Two and has attached a response and action plan to address each item. Both Phase One and Two have given PRM an opportunity to assess its strengths and prepare action plans to improve in areas we agree need more focused attention.

We are excited to report on some of the progress already being made on Phase One recommendations, which will help PRM address some of the items contained in Phase Two. One of the more significant findings in Phase One was the need to develop a shared vision and strategic plan for ACS. The development of such plan will help guide PRM with addressing many of the recommendations from both reports. Just last month, the Mayor seated an Animal Care Visioning Task Force to help define that vision for the shelter. Additionally, both reviews provide a great platform from which to launch the development of an ACS Strategic Plan, slated to commence later this calendar year.

Once again, PRM appreciates the City Auditor’s efforts to help improve our services to the community. The entire PRM team takes great pride in our four-time, nationally recognized "Gold Medal" programs, services, and facilities. With an incredibly dedicated and focused ACS team, we are confident that these recommendations will help improve not only operational efficiency and effectiveness, but also our ability to provide positive outcomes for our shelter guests.

Should you have any questions, please feel free to contact me at 570-3170.

Attachment

cc: Tom Modica, Assistant City Manager
    Kevin Jackson, Deputy City Manager
    Rebecca Garner, Assistant to the City Manager
    Stephen Scott, Deputy Director/Business Operations Bureau Manager
    Ted Stevens, Animal Care Services Bureau Manager
# MANAGEMENT RESPONSE AND ACTION PLAN

The Department of Parks, Recreation, and Marine

Animal Care Services Review: Phase Two

## Phase One Recommendations: Specific recommendations from Phase One were included in this report based on results of our review.

<table>
<thead>
<tr>
<th>No.</th>
<th>Recommendation (new Phase 2 recommendations only)</th>
<th>Priority</th>
<th>Page #</th>
<th>Agree or Disagree</th>
<th>Responsible Party</th>
<th>Action Plan / Explanation for Disagreement</th>
<th>Target Date for Implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Phase One provided many recommendations regarding the development of a volunteer program, some of which include dedicating one full-time employee to volunteer program management, recruitment and training.</td>
<td>M</td>
<td>5</td>
<td>Agree</td>
<td>ACS</td>
<td>The Department will work through the annual budget process to identify resources to address volunteer and adoption services.</td>
<td>October 1, 2018</td>
</tr>
<tr>
<td>2.1</td>
<td>City stakeholders must determine what kind of shelter it wants ACS to be and then ensure the Bureau has the resources and/or operations necessary to produce desired outcomes. This includes not only reviewing and increasing staffing levels accordingly, but also operating according to sound business practices.</td>
<td>H</td>
<td>11</td>
<td>Agree</td>
<td>ACS</td>
<td>The Mayor has seated an ACS Visioning Task Force made up of 20 individuals that will be key stakeholders in assisting ACS with developing a new Mission and Vision.</td>
<td>Fall 2018</td>
</tr>
<tr>
<td>2.2</td>
<td>Implement pathway planning and developing relationships with medical foster groups to move animals out of the shelter as quickly as possible.</td>
<td>H</td>
<td>11</td>
<td>Agree</td>
<td>ACS</td>
<td>ACS has recently begun the process of implementing foster programs. In June/July 2018 ACS implemented a &quot;Foster the Fourth&quot; program to help alleviate shelter crowding during the 4th of July holiday. ACS has recently reassigned a current staff person, as well as identified a group of committed volunteers to expand on this program, which will include a medical foster program.</td>
<td>November 1, 2018</td>
</tr>
<tr>
<td>3.2</td>
<td>Implement Phase One recommendations to develop a strategic plan that can provide a clear vision and direction for the organization, and to establish standard operating procedures to guide day-to-day operations and management.</td>
<td>H</td>
<td>13</td>
<td>Agree</td>
<td>ACS</td>
<td>In FY 18, one-time funds in the amount of $50,000 was allocated by the City Council to help ACS in implementing the recommendations from Phase One of the Auditor's review. ACS will be using these funds to hire a consultant to work with ACS staff, the Mayor's ACS Visioning Task Force, and other key stakeholders to create a long-range strategic plan that will help guide day-to-day operations and create SOP's. ACS is in the process of securing a consultant to assist with this process and should begin later this calendar year.</td>
<td>First Quarter of FY19</td>
</tr>
<tr>
<td>7.2</td>
<td>As states in Phase One, consider outsourcing the processing and collection of animal licenses.</td>
<td>L</td>
<td>17</td>
<td>Agree</td>
<td>ACS</td>
<td>A RFP is being developed and is going through the review process with a target date to be released in Fall 2018.</td>
<td>Fall 2018</td>
</tr>
</tbody>
</table>

## Phase Two Recommendations

<table>
<thead>
<tr>
<th>No.</th>
<th>Recommendation (new Phase 2 recommendations only)</th>
<th>Priority</th>
<th>Page #</th>
<th>Agree or Disagree</th>
<th>Responsible Party</th>
<th>Action Plan / Explanation for Disagreement</th>
<th>Target Date for Implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.3</td>
<td>Analyze Chameleon calls-for-service data by day, time of day and beat, and compare it to the current beat &quot;patrol&quot; structure and ACO scheduling. Beats and scheduling should be aligned with call volume and time to ensure optimal coverage and better response times.</td>
<td>M</td>
<td>12</td>
<td>Agree</td>
<td>ACS</td>
<td>ACS Field Operations will work with the ACS Analyst to create reports to track call volume by day and time and review for potential operational changes.</td>
<td>September 1, 2018</td>
</tr>
<tr>
<td>No.</td>
<td>Recommendation (new Phase 2 recommendations only)</td>
<td>Priority</td>
<td>Page</td>
<td>Agree or Disagree</td>
<td>Responsible Party</td>
<td>Action Plan / Explanation for Disagreement</td>
<td>Target Date for Implementation</td>
</tr>
<tr>
<td>-----</td>
<td>--------------------------------------------------</td>
<td>----------</td>
<td>------</td>
<td>-------------------</td>
<td>-------------------</td>
<td>------------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>3.1</td>
<td>Examine the current culture at ACS and determine the areas in greatest need of improvement to increase employee morale. Focus on finding ways to increase employee satisfaction and engagement such as: recognition programs, advanced training, and providing quality feedback.</td>
<td>H</td>
<td>13</td>
<td>Agree</td>
<td>ACS</td>
<td>ACS is an inherently stressful work location. ACS has taken some steps towards improving the overall morale of staff, however, we agree that more can and should be done. One of the items identified in the previous review report outlined that ACS staff felt there needed to be clearly defined strategic objectives, as well as Mission and Vision statement. All ACS staff will have an opportunity to participate in the Mission, Vision and Strategic planning process and will be instrumental in making the process a success.</td>
<td>First Quarter of FY19</td>
</tr>
<tr>
<td>4.1</td>
<td>To fully recover costs, revise the formula used to calculate contract values to include proportionate share of field services and administrative costs. Update contract service costs to reflect changes in services provided each year.</td>
<td>H</td>
<td>14</td>
<td>Agree</td>
<td>ACS</td>
<td>Working closely with the City Auditor’s Office, ACS staff was able to develop an acceptable new method of fully recovering costs to provide services. This was implemented in the recent renewal of all four contracts.</td>
<td>June 1, 2018</td>
</tr>
<tr>
<td>4.2</td>
<td>Maintain documentation in a manner that supports accurate contract values.</td>
<td>H</td>
<td>15</td>
<td>Agree</td>
<td>ACS</td>
<td>All reports used to determine contract amounts have been saved along with the contract formula used. The ACS Analyst will be assigned to track ongoing performance.</td>
<td>June 1, 2018</td>
</tr>
<tr>
<td>5.1</td>
<td>Utilize FM or an external collection agency to collect unpaid administrative citations.</td>
<td>M</td>
<td>15</td>
<td>Agree</td>
<td>ACS</td>
<td>ACS Management will work with FM to determine what steps are needed to utilize their collection services and then identify staff to be assigned to this task.</td>
<td>September 1, 2018</td>
</tr>
<tr>
<td>5.2</td>
<td>Use Chameleon to monitor and track the payment of administrative citations. After implementing further collection efforts, determine if the additional revenue received offsets the cost.</td>
<td>M</td>
<td>15</td>
<td>Agree</td>
<td>ACS</td>
<td>Once recommendation 5.1 is completed, ACS management will review the collection efforts at a 6-month interval to determine if the benefits outweigh the cost, as recommended in the review.</td>
<td>April 1, 2019</td>
</tr>
<tr>
<td>6.1</td>
<td>Work towards increasing license compliance by 8% by expanding collection and public outreach efforts.</td>
<td>L</td>
<td>16</td>
<td>Agree</td>
<td>ACS</td>
<td>ACS will create an outreach and marketing campaign aimed at increasing awareness of licensing requirements through such potential avenues as utility billing and social media. The campaign will also focus on bringing awareness to the already existing licensing incentives, such as the fast track and free ride home programs. As has been done in the past by ACS, a Resolution will be brought to the City Council to recommend offering a one-month amnesty program to waive the late penalty for pet license renewals. Efforts will be made to outreach specifically to delinquent animal licensees to help increase compliance rates.</td>
<td>November 1, 2018</td>
</tr>
<tr>
<td>No.</td>
<td>Recommendation (new Phase 2 recommendations only)</td>
<td>Priority</td>
<td>Page #</td>
<td>Agree or Disagree</td>
<td>Responsible Party</td>
<td>Action Plan / Explanation for Disagreement</td>
<td>Target Date for Implementation</td>
</tr>
<tr>
<td>-----</td>
<td>-----------------------------------------------</td>
<td>----------</td>
<td>--------</td>
<td>-------------------</td>
<td>------------------</td>
<td>-------------------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>6.2</td>
<td>Require Long Beach veterinarians to submit vaccination information to the City on a monthly basis as per Long Beach Municipal Code.</td>
<td>L</td>
<td>16</td>
<td>Agree</td>
<td>ACS</td>
<td>ACS will identify all Veterinarian offices in Long Beach and send them a letter reminding them of this requirement (Title 6.12.150) and request all recent vaccination records be provided to ACS, if they have not already been sent.</td>
<td>September 1, 2018</td>
</tr>
<tr>
<td>7.1</td>
<td>Enter license and vaccination data timely, within 48 hours, and deposit payments in adherence to AR 21.1.</td>
<td>H</td>
<td>17</td>
<td>Agree</td>
<td>ACS</td>
<td>This issue is one of the reasons ACS is considering contracting out the licensing program. ACS will continue to do the very best that it can with the limited number of staff available. ACS receives thousands of pieces of mail every month, which includes license renewals and payments, rabies certificates, returned renewal envelopes and other miscellaneous items. Most clerks are part-time and have limited hours available. Due to staffing limitations, clerks must also answer phones while processing mail, which can make the task take longer. License renewal transactions and payments are given priority over other mail. The flow of mail can vary greatly depending on the time of year, creating times when staff may get behind. If, and when, the licensing program is contracted out, this issue will be fully resolved.</td>
<td>Fall 2018</td>
</tr>
<tr>
<td>8.1</td>
<td>Determine if license canvassing is cost beneficial, which includes the consideration of shifting canvassing staff positions to other shelter service areas or functions that are prioritized or may add more value.</td>
<td>H</td>
<td>17</td>
<td>Agree</td>
<td>ACS</td>
<td>ACS is in the process of considering contracting out all licensing functions. This recommendation will be implemented, if ACS cannot secure an outside firm to handle licensing.</td>
<td>TBD</td>
</tr>
</tbody>
</table>

If ACS chooses to continue the canvassing program

<table>
<thead>
<tr>
<th>No.</th>
<th>Recommendation (new Phase 2 recommendations only)</th>
<th>Priority</th>
<th>Page #</th>
<th>Agree or Disagree</th>
<th>Responsible Party</th>
<th>Action Plan / Explanation for Disagreement</th>
<th>Target Date for Implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.2</td>
<td>Create performance goals.</td>
<td>M</td>
<td>17</td>
<td>Agree</td>
<td>ACS</td>
<td>ACS is in the process of considering contracting out all licensing functions. This recommendation will be implemented, if ACS cannot secure an outside firm to handle licensing.</td>
<td>TBD</td>
</tr>
<tr>
<td>8.3</td>
<td>Implement a systematic process of selecting locations to canvass. This could include low compliance areas or areas that are densely populated.</td>
<td>M</td>
<td>17</td>
<td>Agree</td>
<td>ACS</td>
<td>ACS is in the process of considering contracting out all licensing functions. This recommendation will be implemented, if ACS cannot secure an outside firm to handle licensing.</td>
<td>TBD</td>
</tr>
<tr>
<td>8.4</td>
<td>Utilize Chameleon to track canvassing in a way that will allow reports to be generated and reviewed to assess the effectiveness of the program.</td>
<td>M</td>
<td>17</td>
<td>Agree</td>
<td>ACS</td>
<td>ACS is in the process of considering contracting out all licensing functions. This recommendation will be implemented, if ACS cannot secure an outside firm to handle licensing.</td>
<td>TBD</td>
</tr>
</tbody>
</table>
### Priority

**H** - High Priority - The recommendation pertains to a serious or materially significant audit finding or control weakness. Due to the seriousness or significance of the matter, immediate management attention and appropriate corrective action is warranted.

**M** - Medium Priority - The recommendation pertains to a moderately significant or potentially serious audit finding or control weakness. Reasonably prompt corrective action should be taken by management to address the matter. Recommendation should be implemented no later than six months.

**L** - Low Priority - The recommendation pertains to an audit finding or control weakness of relatively minor significance or concern. The timing of any corrective action is left to management's discretion.

**Yellow areas - to be completed by the department**