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OFFICE OF THE INDEPENDENT INSPECTOR GENERAL
PATRICK M. BLANCHARD
INSPECTOR GENERAL

69 West Washington Street
Suite 1160
Chicago, Illinois 60602
PHONE (312) 603-0350
FAX (312) 603-9948

August 21, 2015

Honorable Toni Preckwinkle
and Members of the Board of Commissioners
of Cook County, Illinois
118 North Clark Street
Chicago, Illinois 60602

Re: OIIG Summary Report No. IIG15-0027 (Operational Review of the Department of Animal and Rabies Control)

Dear President Preckwinkle and Members of the Board of Commissioners:

This letter is written in accordance with Section 2-289(c)(2) of the Office of the Independent Inspector General (OIIG) Ordinance, Cook County, Ill., Ordinances No. 07-0-52 (2007) (OIIG Ordinance) in connection with an OIIG initiated operational review of the Cook County Department of Animal and Rabies Control (Animal Control or department). The following is a summary of the review:

Investigation Number:	IIG15-0027
Subject:	Operational Review
Disposition:	Recommendations for corrective action are offered.

Summary

In this operational review, this office analyzed the administration, operations, budget, programs, office practices and policies of Animal Control. We also conducted interviews of current and former employees and interested third parties, desk audits and a review of best practices adopted by other jurisdictions in the United States.

Included in this review was an audit conducted by the Drug Enforcement Agency (DEA) of controlled substances in the custody of Animal Control. Interviews were conducted with officials from Animal Welfare League (AWL-Cook County vendor for sheltering and care of animals), Chicago Animal Care and Control (CACC), Chicago Animal Shelter Alliance (CASA), PAWS (non-profit), Illinois Lost Dog (non-profit), Chicago Bar Association Animal Law Committee as well as other organizations. Additional interviews included law enforcement officials from the Cook County Forest Preserve District (FPD) and the Sheriff's Police Department. Members of the Rolling Meadows Police Department, LaGrange Park Police Department and the Chicago Heights Police Department Animal Control and the Skokie Environmental Health Department were also interviewed.

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Importantly, we found the department administration and staff, especially senior staff members, to be extremely cooperative and professional during the course of this review. Senior staff met with OIIG investigators on numerous occasions and offered their complete support in this endeavor.

This review resulted in the identification of numerous conditions and practices existing within Animal Control that reflect an efficiently operated department run by dedicated staff to support its important mission. While this report addresses effective practices employed by the department, its central purpose is to communicate those findings that support recommendations for improved efficiency and effectiveness in the operation of the department. This review was comprehensive in scope and, as outlined below, includes recommendations involving Animal Control's dispatch function, animal control officer protocols, improved technology and shoring-up compliance with policies addressing overtime and compensatory time. However, a central theme to the recommendations that follow involve our belief that the department has an opportunity to expand its leadership role in working with other organizations and municipalities to eliminate barriers that currently exist to reuniting lost animals with their families and the over reliance on euthanasia to manage the volume of domestic animals being housed in shelters.

Background

Cook County holds a population of approximately 5,246,456 individuals that reside within 1,635 square miles.[1] The American Veterinary Medical Association estimates that 31.2% of households in the United States possess pets. Consequently, based upon the U.S. Census Bureau 2010 census for Cook County, it is estimated there are approximately 1,636,894 households within Cook County that possess pets.

Within Cook County, there are two major governmental animal control agencies: Chicago Animal Care and Control (CACC) and the department. Some municipalities within Cook County also have their own animal control agencies or some semblance of one. Additionally, the Chicago Animal Welfare Alliance (CASA) exists as a coalition of approximately 14 shelters and rescues whose mission is to reduce, and eventually eliminate, needless euthanasia of companion animals and to encourage cooperation to find homes for adoptable animals. There are numerous other non-profit organizations that are involved with sheltering, care, and adoption of animals and locating lost pets. Approximately 50,000 animals enter Chicago and surrounding area shelters each year.

The Cook County animal control environment has been described as a maze consisting of a patchwork of animal control agencies and shelters where domestic animals can become easily lost in the system. There is no central repository for the collection and reporting to the public of information concerning the recovery of lost and missing domestic animals. The lack of a centralized repository is an obstacle for pet owners which complicates and hinders the reunification of pets with their owners. This is a contributing factor in shelters being

[1] U.S. Census Bureau 2010 census.

overcrowded resulting in tens of thousands of pets being euthanized annually.[2] The American Society for the Prevention of Cruelty to Animals (ASPCA) and the Humane Society of the United States (HSUS) both estimate that there are approximately 3,500 community animal shelters nationwide and that there is no national organization to monitor them.

National euthanasia statistics are difficult to pinpoint because animal care and control agencies are not uniformly required to keep statistics on the number of animals taken in, adopted, euthanized or reclaimed. Moreover, there is no national reporting structure that exists to require compiling national statistics on these figures. However, ASPCA estimates there are approximately 3.9 million dogs and 3.4 million cats that enter animal shelters nationwide every year. Of the dogs entering shelters, approximately 35% are adopted, 31% are euthanized and 26% who came in as strays are returned to their owner. In regard to the number of cats entering shelters, approximately 37% are adopted, 41% are euthanized and less than 5% of the cats classified as strays are returned to their owners.[3] The No Kill Advocacy Center claims that shelter killing is the leading cause of death for healthy dogs and cats in the United States.[4]

Cook County Department of Animal and Rabies Control

The mission of the department is to provide public health protection to the residents of Cook County and domestic animals. This is accomplished by maintaining a comprehensive rabies vaccination database, providing low cost community-based rabies and microchip clinics, implementation of vaccination protocols, quarantine processes for rabies observation and dangerous animals and performing zoonotic disease surveillance in conjunction with the Max McGraw Wildlife Foundation and the University of Illinois. Public education programs and legislative initiatives are also stressed. According to the Chicago Veterinary Medical Association, the department's administrator is instrumental in her public health leadership role by working diligently with doctors, academic and scientific research institutions, national, state, and regional veterinary associations, governmental bodies, media, elected officials and the public to provide clarity and concrete steps to safeguard both the human and animal populations.[5]

Operational Budget

The department has an operating budget of $4,095,046 for fiscal year (FY) 2015.[6] It currently has 22 full-time employees. There is an administrator, deputy director, accountant, two administrative assistants, 10 clerks, one animal control supervisor and six animal control officers (ACOs). All union employees, administrative staff and animal control officers are scheduled to work an eight hour day with an hour paid lunch from Monday through Friday. The office closes at 4:30 p.m. and remains closed on holidays and weekends. To accommodate after-hour calls for

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[2] Chicago Animal Shelter Alliance.
[3] ASPCA, HSUS and APPA.
[4] No Kill Advocacy Center.
[5] Letter from the President, Governmental Relations Committee Chair and Public Education and Media Relations Director of the Chicago Veterinary Medical Association, to the OIIG (July 23, 2015).
[6] The fiscal year for Animal Control begins December 1st and ends November 30th.

assistance from the public or other governmental agencies, Animal Control has contracted with a vendor which provides an answering service.

Animal Control is a Special Revenue Funds Unit of Government that is completely self-funded and derives its revenues from the sale of rabies tags and fees in accordance with Illinois law. *See* Animal Control Act, 510 ILCS 5/7 (2015). The majority of revenues come from the sale of rabies tags to veterinary hospitals, clinics, animal welfare and adoption agencies, shelters and the general public. The remaining funds are derived from fees associated with services provided such as transport and testing of animal specimens and fines collected for various animal control offenses. Animal Control deposits revenue with the Comptroller's Office. Animal Control deposited $3,410,000 in FY 2013, $3,495,000 in FY 2014 and $2,320,000 through June 25, 2015. According to statute, surplus funds must be maintained in a Special Revenue Funds account and the funds must be earmarked solely for animal control activity. A review of the budget for Animal Control for fiscal years 2013, 2014 and 2015 reveals that Animal Control appropriated the following dollar amounts for these fiscal years:

2013 Appropriation:	$3,411,065	
2014 Appropriation:	3,452,832	1.012% increase from 2013
2015 Appropriation:	4,095,046	20.010% increase from 2013

The department expended 88.92% ($3,033,245) of its appropriated funds in 2013 and 90.74% ($3,133,225) of its appropriated funds in 2014. The unencumbered amounts from 2013 and 2014 accrue to the growing surplus in the Animal Control fund balance. According to County financial statements, the balance of the Animal Control Special Revenue Funds Account was $8,010,573 as of the fiscal year ending November 30, 2014.

The amounts allocated for employee costs in FY 2013, 2014 and 2015 are summarized below:

Year	Employee Costs Allocation	% of Total Allocation
2013	$1,589,787	46.6
2014	1,584,795	45.9
2015	1,627,120	39.7

In addition to payroll related expenses, Animal Control allocated the following significant amounts to other purposes:

Purpose	2013	2014	2015
Special/Coop Programs	$840,000	$880,000	$ 960,000
Institutional Supplies	87,300	110,000	100,000
Cook County Administration	480,000	431,000	351,000
Reimburse Designated Fund	152,000	50,000	50,000

Professional Services	70,000	80,000	595,000
Vehicle Purchase	-0-	-0-	215,000

Special/Cooperative Program funds are allocated to the University of Illinois Pathology Program, which performs disease surveillance and any requested necropsies and rabies testing of specimens, and to the Max McGraw Wildlife Foundation Surveillance Project contract for the study of wildlife in Cook County. Animal Control awarded a contract to the University of Illinois in the amount of $95,000 per year for fiscal years 2015 – 2017 while the Max McGraw contract is a five year contract for $204,000 per year. The Max McGraw Wildlife Foundation Surveillance Project was initiated by the previous administrator and is being continued. Reportedly, the information gained from such a longitudinal study is extremely valuable scientific information that provides researchers information regarding the habits and movements of mainly rabies carrying animals and predators such as coyotes. The danger in failing to track these animals is the potential that they may have contact with people and can transmit rabies and other zoonotic diseases. The continued study and tracking of these animals assists Animal Control and other agencies with their management and the mitigation of public health threats. The remainder of the funding is reserved for various special programs as they arise. For instance, such funds may be required for incidents involving horse or cow injuries, animal abuse or for the impoundment of animals requiring extraordinary care. The reimbursements to veterinarians for the spay/neuter program also is charged to this budget line. For FY 2015, spay/neuter reimbursement amounted to $216,360.

Staffing

As previously noted, Animal Control currently employs 22 full-time staff, including 13 clerical office support staff who are substantially involved in the processing of rabies tags and rabies tag data.

The rabies tag data system is an archaic and manually intensive computer program named Passport. The Passport system does not allow outside entities (all of the customers) the ability to electronically upload rabies tag data to the department; therefore, the data must be entered manually by the staff. The majority of the data is submitted to the office from animal hospitals and clinics, shelters, rescue and adoption groups and from the low cost rabies clinics. According to staff, approximately 67% of the information is submitted by the largest customers electronically via different media. The largest users of the rabies tags (Chicago Animal Control, PAWS, AWL, etc.) submit their data to Animal Control using another archaic program named ACE. Once the data is received through ACE, staff at Animal Control then must manually adjust the data so it is compatible with Passport before it can be uploaded. This process is very inefficient and requires a great deal of time. The remainder of the tags must be input manually into the database by office staff. Due to the volume of rabies data requiring uploading and manual entry, compensatory overtime is automatically authorized for the clerks as well as other staff.

Technology

During the course of this review, the Cook County Bureau of Technology ("BOT") indicated that the mainframe computer based Passport program is archaic and inefficient and will soon be unsupportable due to lack of programmers able to write code. A web based program would allow rabies tag data to be entered electronically by animal hospitals, shelters and other users. Significant efficiencies could be achieved to allow the department to allocate its resources away from the current labor intensive system for managing rabies tag information. Remote access could be provided to those who require it in a safe and secure manner. Migrating the rabies tag data system to an easily accessible and secure web based environment where the tag data could be uploaded through a secure web portal on the Animal Control website would be a relatively easy project for BOT – one that was recently completed for the Medical Examiner's Office and another nearing completion with the Board of Review.

Animal Control recorded 22,764 entries in its Chameleon system in 2014.[7] These entries ranged from administrative updates such as reporting in for work, going to lunch, fueling vehicles, to conducting stray patrol, transporting an animal, assisting law enforcement and other field activities. Only 6,638 entries required an ACO to respond to an animal related incident. There were 262 entries related directly to stray patrol that ranged from impoundment (105) to issuance of citations/warnings, unable to find/capture animal, returning animal to owner and other categories (157).

Rabies Clinics, Bite Investigations and Spay/Neuter

Animal Control conducted 40 low cost rabies vaccination clinics in 2014 where 4,399 animals were vaccinated and 247 animals received microchips. Collectively, the department sold 421,229 rabies tags (both 1-year and 3-year rabies tags) to animal shelters, clinics and veterinarians. The department conducted 26 dog bite investigations during 2013 and 2014.

The department also offers a $40 rebate for all Cook County pet owners who spay/neuter their pets at veterinary hospitals participating in the program. Animal Control reported that 3,472 animals (2,208 dogs and 1,266 cats) were spayed and neutered during February and March of 2015; subsequently, $216,360 was rebated to Cook County pet owners who participated in the program. The department provides the highest spay/neuter rebates of any organization in Illinois.

Animal Control Officers

The ACOs who have assigned take home government vehicles conduct stray patrols in the unincorporated areas of Cook County and the Cook County FPD. The department has

[7] The Chameleon system is an integrated shelter software case management system used by animal care facilities and animal control agencies. It was developed to help manage and track all the data at any animal care facility.

reported that a total of 267 stray animals were impounded with the Animal Welfare League in 2013 and 2014. We have learned that the work day for the animal control officers commences when they depart their residences while their work day ends when they arrive at their residences notwithstanding the amount of time required to commute to their assigned work areas.

Contracted Shelters

Animal Control does not operate an animal shelter. Consequently, the department contracts the sheltering and care of animals impounded with the Animal Welfare League – a not-for-profit organization located in Chicago Ridge, Illinois. The most recent contract was awarded in the amount of $22,000 for the period of October 1, 2014 through September 30, 2015. Efforts have been initiated to establish a second contract with an animal shelter that will minimally satisfy the Cook County Animal and Rabies Control Ordinance which requires one shelter north of I-290 and one south of I-290. Cook County Code, section 10-9(a), Stray animals.

OIIG Findings and Conclusions

The operational review included both an internal and external examination of the department and resulted in the identification of various issues that form the basis for our findings and recommendations outlined below. The major findings include:

- The review revealed four areas in which there was non-compliance with a policy, regulation, ordinance or Collective Bargaining Agreement:
  - Non-compliance with the Cook County Supplemental Policy regarding overtime/compensatory time;
  - Non-compliance with the Controlled Substance Act and DEA's reporting requirements;[8]
  - Non-compliance with the Animal Control Ordinance regarding the establishment of two animal shelters;
  - Non-compliance with the Collective Bargaining Agreement regarding working during lunch break;

- The department is currently operating with antiquated software used to upload and maintain the rabies data information collected from the various animal hospitals and animal shelters. The antiquated software is a major factor leading to over staffing of clerks and the staff working overtime;

- The review exposed a lack of professionalism regarding the intake and dispatch of incoming calls for assistance and complaints. The current practice of dispatching calls is also inefficient and ineffective;

[8] The DEA's final report is currently pending.

- The department has failed to conduct annual employee performance evaluations and has failed to document the imposition of progressive discipline. Measuring the effective performance of employees is a commitment to development of employees and program effectiveness and should be undertaken in the future;

- There are inadequate internal controls and oversight for the monitoring of overtime;

- The Animal Control website fails to provide guidance to pet owners whose domestic animals are lost or missing and there is no central repository for the collection and reporting of information concerning lost and missing domestic animals;

- We believe there should be a second veterinarian hired on either a part-time or contract basis to support the rabies clinics. Additionally, part-time staff should be hired to support the low cost rabies clinics as well. The current practice of relying upon the administrator to provide veterinary services and using clerical and administrative staff to conduct the rabies clinics is inefficient.

- A major area of concern pertains to the ACOs and ACO Supervisor. ACOs are allowed to start and complete their workdays from their residences. This means that every day, the ACO's are commuting both to and from their residences to their work location on County time. In one particular instance, this amounts to approximately three hours per day. If traffic is heavy, causing the ACOs to arrive late to their residence, they are compensated with compensatory time. Also, the ACO Supervisor is a union member and is responsible for discipline and other duties involved in his supervision of the ACOs. This management structure creates a conflict regarding the reporting of policy violations and disciplining of ACOs who are also union members.

  The ACOs also lack regularly scheduled training. Additionally, ACOs supervision does not include the utilization of available Global Positioning System (GPS) technology to monitor the ACOs when they are in the field or when setting duty assignments. The department also utilizes the ACO Supervisor as an office courier for administrative purposes which detracts from his primary function. Importantly, it was noted that numerous comments were received from law enforcement agencies regarding the unavailability of ACOs outside of the department's normal working hours. Similar criticisms were noted in connection with the response times when Animal Control is called for assistance.

  We also believe that the lack of an intelligence-based statistical model in the deployment of the ACOs represents a significant vulnerability, particularly in connection with stray patrols. As it is now practiced, the department's strategy for stray patrol is best described as inefficient and lacking direction.

- As noted above, Animal Control operates with an archaic data system. In addition to the previously noted inefficiencies, the current systems are a contributing factor in the

lack of access to rabies tag information. The current system's functionality was the basis for repeated criticisms noted in this review by welfare agencies and organizations, animal shelters, law enforcement officials, as well as ACOs. While Animal Control officials referenced privacy concerns as the basis for strictly limiting access to the available data, we believe that a system of controlled access could be achieved to allow ACOs in the field, law enforcement officials (particularly after-hours) and animal welfare agencies access to critical information enabling them to aid in the identification and reunification of pets with their owners.

- The department has offered a business case proposal to construct a stand-alone facility on Forest Preserve grounds to be funded by the department. This proposal includes office space to house the department, as well as functional space to house animals impounded by the ACOs, Sheriff's officers and the FPD Police. The proposed facility would also have a capacity for rabies bite observation and impoundment of animals accepted through contractual arrangements with municipalities. The project includes a venue for educational programs for all ages regarding domestic animals, wildlife, conservation, veterinary medicine, public health, and other issues.

  The department's November 30, 2014 surplus balance in its Special Revenue Fund totaled $8,010,573. The investment cost estimates (building, equipment, infrastructure and furniture) ranged from $6,030,000 to $9,900,000. The proposal revealed no immediate budget impact to the County General Fund while annual revenue of $1,150,000 was forecast. However, we were unable to identify substantial support for the cost savings metrics. Moreover, we believe that certain estimates were exaggerated. For example, it was stated that the department spends $400,000 to private veterinarians for spay/neuter per year, when in fact, the actual numbers were significantly less. Similarly, the revenue projections for the self-performed spay/neuter surgeries would require an extraordinary number of procedures to be performed on an annual basis to achieve the projected goal. Finally, the proposal does not include a cost analyses of the increase in staff required to operate a shelter on a 24 hour – 365 day basis.

  We believe that the business case proposal for a new facility is unsound despite the fact that public access for veterinary services and educational purposes would be enhanced with a stand-alone facility. While there are obvious benefits to operating this facility, such as having access to the facility round the clock which is not currently available due to the department's location in a courthouse facility with restricted after-hours access. A new facility could also support a year round low cost rabies vaccination program and afford the potential to perform low cost spay/neuter procedures on-site as well. However, the lack of support or explanation for the

revenue projections, the lack of a cost analyses to address operational increases make the current proposal speculative.[9]

In addition to the major findings noted above, a number of additional issues were identified through interviews and analyses of data that are highlighted below:

- Animal Control's enforcement of the prohibition of the sale of commercially bred dogs, cats and rabbits in pet shops is reactive instead of proactive;
- The Petty Cash Fund was not reconciled appropriately (imprest basis);
- The AWL contract to provide for the sheltering and care of stray animals does not require it to post its statistics regarding strays, owner reunification, adoption and euthanasia;
- Dispatching does not adequately utilize the existing technology in an efficient and consistent manner;
- Law enforcement agencies are unaware of and/or lack knowledge of the Regional Catastrophic Planning Team Animal Services Plan;
- Animal Control microchip clinics lack an educational component regarding the registration process;
- Animal Control microchip clinics are limited in the number offered; and
- The Animal Control Ordinance does not provide for feral cat colony caretakers to take advantage of the low cost spay/neuter program.

OIIG Recommendations

Animal Control works diligently to provide animal control services to the citizens of Cook County. We recognize that the department's primary mission is not centered upon lost and stray domestic animals as the public and others may believe but upon protecting the health of the public and domestic animals through vaccination, registration (rabies), legislation and surveillance (research). We believe that Animal Control has accomplished and continues to meet its mission focus by offering numerous low cost rabies clinics throughout the county, offering a spay/neutering rebate program, proposing legislation to address the feral cat population and supporting the Max McGraw Foundation Surveillance Program. Nonetheless, the operational review revealed several opportunities for improved service delivery and exposed vulnerabilities that require further consideration. We also believe that in spite of the department's accomplishments, Cook County continues to reflect a "patchwork" of animal shelters and organizations where domestic animals are brought and where barriers exist that hinder reunification. Moreover, because the municipalities incorporated in Cook County are

[9] Additionally, the construction of the facility anywhere within the County would not satisfy the ordinance requiring two impound facilities (one north and one south of Interstate 290). This requirement could still be satisfied by the continuation of the current contract with AWL or the proposed contract with Golf Rose Animal Hospital. However, regardless of the location of the proposed facility, it would be geographically distant and inconvenient to the majority of the Cook County metropolitan area. Before any further consideration of this business case is undertaken, further analysis is required.

responsible for animal control within their borders and due to the lack of a centralized authority to collect, assess and act upon available information, there will continue to be missed opportunities for reuniting lost animals with their families and over reliance on euthanasia to manage the high number of domestic animals being housed in shelters. However, this condition also presents a unique leadership opportunity for the department to provide a unified structure to address the patchwork of animal shelters and organizations. *See generally* Cook County Code, section 10-6(d)(authorizing the department to develop new programs to aid in the elimination of stray animals in the community).

Accordingly, and in light of the unique position the department stands in County government, we recommend the department take a leadership role working with agencies such as CASA,[10] Lost Dogs Illinois,[11] Pet Search and Rescue, Helping Lost Pets[12] and other animal organizations, as well as municipalities in addressing these issues. We believe that by implementing this recommendation, Cook County will take a significant leap forward in its ability to reunite lost animals with their owners, reduce reliance on euthanasia practices while improving efficiencies toward this shared goal.

In this regard, Animal Control and all its partners should adopt the paradigm that most lost pets do not need a new home; rather they simply need to go home. At the heart of this approach is the establishment of a clear and effective line of communication among stakeholders and consideration of the following:

(a) The department should include within its website guidance and direction to pet owners beginning their search for a lost, missing or stolen pet. This information should include a listing of public and private animal organizations including addresses, phone numbers and hyper-links where the owner could access the agencies' websites. Moreover, we believe that the website should include data concerning the number of animals impounded and outcome;
(b) The development of a centralized website available to the public where lost and found domestic animals can be posted along with descriptive data and photographs of the animal;

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[10] CASA membership consists of AWL, PAWS, Anti-Cruelty Society, Tree House Humane Society, Lovin' Life Rescue, One Tail at a Time, Chicago Animal Care and Control, Chicago Canine Rescue Foundation, Felines & Canines, Found Chicago, Harmony House and Lake Shore Animal Shelter.

[11] Lost Dogs Illinois is a NFP that provides free services to help families locate their missing dogs through the use of their network of volunteers statewide and its website: lostdogs@gmail.com.

[12] Pet Search and Rescue is a 501(c)(3) non-profit organization founded and operated by Mr. Jay Pennington in the San Antonio, Texas area. Pet Search and Rescue works with specialists in shelter/kennel management, wildlife rehabilitation, and spay/neuter/medical. Mr. Pennington is a software/database developer who designed the software for Pet Search and Rescue about 12 years ago. Pet Search and Rescue's website is www.sapets.com. Similarly, Mr. Rob Goddard, a software developer from Toronto, created Helping Lost Pets, a website designed to aid in the reunification of lost pets with owners. www.helpinglostpets.com. Both individuals believe their respective programs could serve as critical component to resolving these issues.

(c) The establishment of a dead animal registry whereby deceased animals found and presumed to be pets are scanned for a microchip. The microchip information would be maintained in the registry with a physical description of the pet, location where the animal was found and a photograph of the animal. This practice would enable owners to obtain this information and allow families who are looking for a lost pet an opportunity for closure;
(d) Development of a central repository system (microchip registration numbers and rabies tags numbers) available to law enforcement and animal shelters; and
(e) The proposed partnership with CASA and other stakeholders should involve the development of methods to deal with the impoundment and holding times of biters and dangerous dog investigations to free up valuable shelter space for other animals.

We also recommend that Animal Control coordinate with CASA and other animal welfare agencies in cost sharing of various programs of mutual interest such as rabies clinics, microchip clinics, spay/neuter and trap/neuter/release programs as well as others.

We recommend that the department remediate the areas determined to be in non-compliance with a policy, regulation, ordinance and the CBA, specifically the Cook County Supplemental Policy as it pertains to overtime/compensatory time, overtime eligibility, the Controlled Substance Act regarding the violations cited by the DEA, the Animal Control Ordinance as it pertains to the establishment of a viable second animal control shelter and, the Collective Bargaining Agreement regarding allowing employees to earn compensatory time during their paid lunch hours. Additionally, the department should consider the establishment of more than two locations for the sheltering of animals in Cook County to address accessibility issues.

We also believe that, should Animal Control continue contracting out for sheltering and care of animals, it should conduct its own inspection protocol of each contractor's facility and not to solely rely upon the Department of Agriculture for this function. Moreover, the inspection results should be made public and posted on the department's website.

As outlined above, the department's dispatch functionality is limited. Animal Control should negotiate an inter-governmental agreement for its dispatching function and deployment of the ACOs by the Cook County Sheriff's Police communication center for all dispatching and after- hours calls.[13] The deployment of the ACOs for stray patrol should involve an intelligence-based analytical model of the complaints, request for assistance received and needs of the community and not left to the discretion and judgment of the ACOs. The Sheriff's Office has successfully established the capacity to develop this form of intelligence based analytics and put it into practice.

[13] The Cook County Sheriff's Police Communication Center received national accreditation from the Commission on Accreditation for Law Enforcement Agencies, Inc., and has maintained that status since July 2003.

The department should undertake a study for the most beneficial use and effective management of the $8,000,000 in surplus funds and future surpluses generated from ongoing operations of Animal Control. As discussed above, the proposed business case for a new Animal Control facility requires further analysis and, following such an in-depth study, may or may not stand as the most beneficial use of the surplus in light of alternative uses. While the advantages to establishing such a facility are apparent, the costs associated with its maintenance must be realistically assessed and balanced against its advantages and alternatives.

The rabies tag database must be modernized. A web based system will permit veterinarians and animal hospitals that sell rabies tags to enter registration data directly at the point of sale instead of sending the rabies data to the department to have it entered manually. The department, along with the Bureau of Technology, should migrate the rabies database to a secure web based system. By increasing the automation of the rabies tag data entry and database maintenance, Animal Control should be able to realign the workforce and mitigate employee overtime. Additionally, restricted access to the rabies database should be allowed to law enforcement agencies and animal shelters.

The department should carefully consider expanding microchip clinics and make them free to the public with the intended goal of increasing the number of pets being reunited with their owners. It should be noted there are organizations that provide grant funding for various domestic animal initiatives and free microchip registration services.[14]

We believe the department should consider including in future contracts with animal shelters contractual language requiring the practice of posting photographs of strays and appropriate information about the strays on their websites with the goal of reuniting pets with their owners. As with the department, these agencies should revamp their web pages to include guidance and direction for pet owners beginning a search for a lost or stolen pet.

Cook County has established advisory boards to assist certain agencies such as the Juvenile Temporary Detention Center and Medical Examiner's Office. In a similar manner, we believe that the establishment of an advisory board to serve Animal Control in developing strategies could enhance the department. *Contra* Cook County Code, Administrative Regulations to the Cook County Animal and Rabies Control Ordinance, Part IV. Animal Control Through the Formation of a Community Department of Animal Control, 3. Animal Control Advisory Committee, p. 44 (supporting an advisory board for community activities alone).

Additional recommendations include:

(a) The Petty Cash Fund must be maintained on an imprest basis. Overages/shortages must be documented, reported and immediately resolved;
(b) The ACO's must begin and end their day of work from their areas of assigned responsibility and not from their residences and receive greater supervision:

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[14] Best Friends Animal Society and Found Animals Foundation

(c) The ACO work schedules should be adjusted (days of week and hours) for improved coverage and reflective of the needs of the County. If necessary, additional ACOs should be retained to provide the necessary coverage;
(d) The ACOs should have computer access to the rabies and microchip databases from their government vehicles and routine inspections of the ACOs vehicles and equipment should be conducted;
(e) The position of Animal Control Supervisor should not be a unionized position or the department should realign its management structure to enable appropriate oversight of the ACOs. Moreover, the ACO Supervisor should not be tasked with the provision of courier services;
(f) The department's management must hold their employees accountable and implement progressive discipline and establish internal controls for improved monitoring and scrutiny of overtime/compensatory time. Annual employee performance evaluations should be conducted:
(g) The department should consider hiring another veterinarian on a part-time or contractual basis to provide support and relief to the Administrator who is the only veterinarian on staff to support the rabies clinics. Consideration should also be given to retaining part-time support for the clinics rather than Animal Control staff;
(h) In-service training should to be routinely scheduled for the ACOs;
(i) The department should liaison with the area police academies and explore the possibility of conducting a training segment for police cadets. The department should engage in a permanent schedule of on-site training programing that meets the needs of municipal police departments throughout Cook County regarding animal control issues;
(j) The department should conduct a survey of the needs of municipal police departments and affirmatively engage their representatives to foster a working relationship;
(k) CCDARC should reconsider the practice of offering the spay/neuter rebate program to County residents who can afford the cost of the service and concentrate increasing program participation in the economically disadvantaged areas of Cook County. Auto-renewal email notifications and other features that make the licensing process more convenient and faster should also be implemented;
(l) Animal Control should also negotiate an inter-governmental agreement with the Sheriff's Police Department and the FPD Police Department for expenses these agencies incur for the sheltering, care and feeding of domestic animals they impound at the cost to these agencies;
(m) The department should designate a telephone hotline and website and advertise its availability to afford citizens the opportunity to file complaints concerning the sale of commercially bred dogs, cats and rabbits in pet shops and other information pertaining to animal abuse;
(n) In a similar way that we recommend the department take a leadership role in addressing County-wide reunification efforts, we also believe that a leadership opportunity exists in connection with the prohibition of the sale of commercially bred dogs, cats and rabbits.

We hope this information proves helpful. Finally, in accordance with Section 2-285(e) of the OIIG Ordinance, we respectfully request notification within 30 days of any action taken in response to these recommendations. Thank you for your consideration to these issues. Please do not hesitate to contact me if you have any questions.

Very truly yours,

Patrick M. Blanchard
Independent Inspector General

cc: Dr. Donna Alexander, Administrator, Cook County Animal and Rabies Control
Ms. Tasha Green Cruzat, Chief of Staff, Office of the President
Hon. Thomas J. Dart, Cook County Sheriff
Ms. Laura Lechowicz Felicione, Special Assistant to the President
Ms. Martha Martinez, Chief Administrative Officer
Mr. Arnold Randall, General Superintendent, Cook County Forest Preserve District
Mr. John Roberts, Chief of Police, Forest Preserve District of Cook County
Ms. Zelda Whittler, Cook County Undersheriff