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October 6, 2022

TO: Marcia Mayeda, Director Department of Animal Care and Control

Greg Hellmold, Chief Greg Helenned

FROM: Greg Hellmold, Chief Office of County Investigations

SUBJECT: DEPARTMENT OF ANIMAL CARE AND CONTROL – IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED REVIEW (REPORT #IOR-2018-14735) - FIRST FOLLOW-UP REVIEW

We completed a follow-up review of the Department of Animal Care and Control (DACC or Department) Improvement Opportunities Report dated June 11, 2019 (Report #IOR-2018-17435). As summarized in Table 1, DACC fully implemented three, and partially implemented two recommendations to enhance oversight of their Enforcement Services. DACC needs to implement the two outstanding recommendations to strengthen controls and monitoring over DACC's Enforcement Services' policies, procedures, and practices.

RECOMMENDATION IMPLEMENTATION STATUS					
		<u>o</u>	UTSTANDING REC	OMMENDATIONS	
PRIORITY	TOTAL	FULLY	PARTIALLY	NOT	
RANKINGS	RECOS	IMPLEMENTED	IMPLEMENTED	IMPLEMENTED	
PRIORITY 1	2	1	1	0	
PRIORITY 2	3	2	1	0	
PRIORITY 3	0	0	0	0	
TOTAL	5	3	2	0	
				2	

Table 1 - Results of First Follow-up Review

For details of our review and the Department's corrective actions, see Attachment. We will perform a second follow-up review and report back on the two outstanding recommendations in accordance with our standard procedures.

We thank DACC management and staff for their cooperation and assistance during our review. If you have any questions, please contact me at (213) 893-0243 or <u>ghellmold@auditor.lacounty.gov</u>, or your staff may contact Acting Supervising Investigator Graciela Soto at <u>gsoto@auditor.lacounty.gov</u>.

GH:TT:GLS:gls Attachment

c: Arlene Barrera, Auditor-Controller Audit Committee Audit Division

REPORT #F1-2018-14735

LOS ANGELES COUNTY AUDITOR-CONTROLLER

Robert G. Campbell ASSISTANT AUDITOR-CONTROLLER Greg Hellmold DIVISION CHIEF

OFFICE OF COUNTY INVESTIGATIONS

Report #F1-2018-14735

DEPARTMENT OF ANIMAL CARE AND CONTROL IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED REVIEW (REPORT #IOR-2018-14735) – FIRST FOLLOW-UP REVIEW

RECOMMENDATION A-C COMMENTS Priority 1 – Department of Animal Care and Control **Recommendation Status: Implemented** (DACC or Department) management explore opportunities to implement enhanced supervision DACC management informed us that ACOs techniques and oversight, such as a routine process assigned to canvassing activities no longer perform for reviewing and reconciling at least a sample of in-person canvassing and recently began relying Global Positioning System (GPS) data and primarily on phone calls and e-mail correspondence for canvassing activities. As a result, they no longer productivity outcomes. Nothing this in recommendation is intended to limit DACC's use DACC or personal vehicles for canvassing. flexibility in offering its employees the full range of ACOs manually document their daily activity via County approved flexible work options and canvass cards to provide an independent record of schedules that management determines support the their canvassing efforts (phone calls and e-mails). Department's mission, goals, and objectives. Telephone canvassing is conducted via Amazon Connect, a cloud-based contact center provided by Original Issue/Impact: Field Supervision - DACC Amazon Web Services, which logs the date, time, Animal Control Officers' (ACO) field activity was not and duration of each call. ACOs also regularly contact constituents via e-mail and such e-mails are regularly or effectively monitored by Enforcement Services supervisors. For example, DACC fleet memorialized via Outlook. vehicles are equipped with GPS tracking devices, but management did not review the GPS data or DACC management indicated they conduct regular reconcile it with field activity reported by staff. spot-checks and guarterly reviews of calls and e-mails completed by ACOs that conduct canvassing activities to verify ACO work performance, but do not The absence of regular monitoring impairs management oversight of field personnel, and may formally document such reviews. Specifically, DACC prevent the timely detection and resolution of issues management compare and reconcile the daily involving employee productivity, accountability, and activity recorded on ACO canvass cards to the adherence to policies, work schedules and generated Amazon Connect audit reports to verify assignments. Lax or loosely enforced performance ACO daily work-product. DACC management measures may not provide sufficient assurance that indicated their new canvassing procedures continue DACC employees are making the most productive to evolve and once they formally establish their use of County time and resources. virtual canvassing procedures, DACC management will include a formal documented review process.

Priority Ranking: Recommendations are ranked from Priority 1 to 3 based on the potential seriousness and likelihood of negative impact on the Agency's operations if corrective action is not taken.

LOS ANGELES COUNTY AUDITOR-CONTROLLER

	RECOMMENDATION	A-C COMMENTS
2	Priority 1 – DACC management:	Recommendation Status: Partially Implemented
	 a) Consider revising DACC Policy HR200 to clarify the requirement that staff account for their work- related vehicle use by either: i. Using a County/DACC fleet vehicle, when 	DACC stated since ACOs now rely primarily on phone calls and e-mail for canvassing activities, they do not currently use personal or DACC vehicles for
	 available and appropriate; or ii. Submitting a mileage claim via the Mileage Authorization and Reimbursement System (MARS) for any business use of their personal vehicle, no less frequently than once per month; 	canvassing. Accordingly, they considered updating DACC Policy HR200 but ultimately did not since they believe County policy adequately addresses fleet and mileage claim requirements as DACC Policy HR200 states, "any employee who is authorized to use his own personal vehicle to carry out his
	 Remind staff of the requirements of DACC Policy HR200 by distributing the policy to impacted staff and document staff received and acknowledged the policy; 	assigned duties will complete the County Mileage Claim report on a monthly basis." DACC indicated DACC Policy HR200 requires staff to submit timely mileage claims via MARS.
	 c) Conduct periodic reviews, on a sample basis, to ensure compliance with policies for DACC vehicle usage and the submission of reimbursement claims. 	DACC management reminded staff of the requirements of DACC Policy HR200 by sending an e-mail to all supervisors on June 3, 2019, and staff on June 4, 2019. As of February 2022, 11 ACOs are
	Original Issue/Impact: Personal Vehicle Usage and Mileage Claims: ACOs did not consistently report use of their personal vehicles when conducting County business, as required by DACC Policy HR200.	assigned to the Canvassing Unit, and DACC provided signed acknowledgments confirming each of the 11 employees received the policy. This recommendation remains partially implemented
	The lack of documentation of employee vehicle usage while performing County work impairs management oversight of field staff, and may result in employees incurring unreimbursed costs for carrying out their assigned duties.	since DACC does not document periodic reviews of mileage claims. DACC management reported they are creating formal procedures for documenting periodic reviews of mileage claims by individuals independent of the claims approval process, and plan to fully implement this recommendation by October 2022.
3	Priority 2 – DACC management consider developing more robust qualitative and quantitative performance measures that take into account various work performance factors, as well as various social, economic, demographic, and population density data that may impact staff's ability to meet performance targets.	Recommendation Status: Partially Implemented DACC management indicated that they have not yet established formal ACO performance measures for virtual canvassing activities. Prior canvassing was measured by in-person interactions, while virtual canvassing will be measured by various metrics depending on ACO assignments (e.g., calls made, e-
	Original Issue/Impact: Performance Measures – We noted significant variances between the number of site visits completed by different employees	mails sent, etc.).
	assigned to field canvassing duties, and no evidence that supervisors followed-up on the variances. We also found anecdotal evidence that some employees	DACC management reported that new canvassing procedures continue to evolve and once finalized, DACC will establish formal ACO performance measures. leveraging Amazon Connect reports and
	slow their pace of work or stop working once they meet established performance targets. Staff also indicated that some neighborhoods are preferred	canvass cards to verify staff activity (e.g., calls made, e-mails sent, etc.). While DACC management could not provide a projected implementation date, they

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	RECOMMENDATION over others because they require less effort to meet performance targets.	A-C COMMENTS confirmed their commitment to fully implementing this recommendation.
	Significant variances in performance between staff performing identical duties suggests that current performance measures may not be effective at monitoring or motivating optimal performance by field canvassing staff. More dynamic and robust performance standards can positively impact productivity and allow management to acknowledge high performing employees and to assist staff whose performance needs improvement.	
4	Priority 2 – DACC management consult with the Chief Information Office (CIO) on options for	Recommendation Status: Implemented
	 implementing information technology solutions to automate the collection of routine/transactional data and performance measures, improve staff productivity by reducing the time spent compiling manual documentation, and enhance the safety of field personnel. Original Issue/Impact: Technology Upgrades – We noted that ACOs reported spending a considerable amount of time each day manually documenting their fieldwork activity on canvass sheets, citations, and in various logs, which cannot 	DACC consulted with CIO and concurrently obtained services from a consultant to implement technology solutions. The consultant's assessment advised DACC to improve infrastructure around data collection to increase revenue from canvassing efforts. In January 2020, DACC staff began utilizing mobile devices, including credit card readers, via a pilot program recommended by the CIO. However, given ACOs no longer conduct in-person canvassing, the mobile devices were returned to DACC Information Technology.
	be readily reviewed, summarized, or analyzed for trends. In addition, field personnel are generally not equipped with mobile phones or other devices that could be used to automate the collection of such data.	As a direct result of consulting with CIO, and in lieu of conducting in-person canvassing, DACC implemented Amazon Connect, which ACOs utilize to contact constituents for canvassing purposes. Specifically, ACO calls are automatically documented via Amazon Connect, which records the
	Manually documenting fieldwork, citations, and canvassing activity without the benefit of an integrated information system is labor intensive, reducing the staff resources available for performing canvassing and enforcement activity. In addition, the lack of a central, electronic repository for information on employee performance and activity reduces opportunities for timely management oversight.	ACO's activity including: the total calls made, date and time in which a call was made, the phone number the ACO called, and duration of the call. Such information was previously manually written by ACOs while they conducted in-person canvassing activities with no method to verify interactions occurred. Now, DACC management can independently confirm ACO activity because there is an independent electronic record of such activity.
		DACC management indicated they plan to continue to work with the independent consultant to implement additional technological solutions.
5	Priority 2 – DACC management: a) Ensure that each employee's personnel file	Recommendation Status: Implemented
	contains acknowledgments for all DACC policies.	a) DACC management e-mailed a copy of the Department policy manual to all staff on

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RECOMMENDATION	A-C COMMENTS
 b) Remind DACC staff of Interpretive Manual Section (§) VI and DACC Policy HR190 prohibiting employees from combining their lunch break and 15-minute rest period. 	May 13, 2019, with instructions for staff to return a signed acknowledgment attesting they received and understand all DACC policies. We reviewed personnel files for 11 ACOs assigned to the Canvassing Unit and confirmed each
Original Issue/Impact: Policy and Procedure Acknowledgments – We noted that the Personnel Files for three (75%) of four ACOs did not include acknowledgment forms for all current DACC policies. For example, the ACOs told us they regularly combine their 30-minute lunch and two 15- minute breaks for a combined one-hour lunch period and were unaware of Interpretive Manual § VI and DACC Policy HR190 prohibiting this practice, despite DACC management's assertion that the policies were located on DACC's shared drive. We also noted missing acknowledgments for DACC policies HR200, VE100, and VE140.	personnel file contains a signed acknowledgment.
DACC management indicated that they became more diligent about tracking the completion of signed acknowledgments for policies issued after 2017. However, some of the personnel files we reviewed do not contain a complete set of acknowledgments for the current DACC policies issued prior to 2017.	
DACC's current practice of obtaining a formal acknowledgment from staff of policies and training they received, reinforces their importance and promotes compliance. However, the absence of a formal acknowledgment for some employees may impair management efforts to enforce policies and hold those staff accountable.	
Lunch and break periods are provided to reduce fatigue by providing employees opportunities to periodically stop working. This ensures that they are rested and able to effectively and efficiently perform their assigned duties. Breaks and lunch periods may also be described in the memoranda of understanding negotiated with various County bargaining units. When employees use their break periods and lunch in a manner inconsistent with County policy and MOU requirements, they may create liability and suffer impaired performance.	

We conducted our review in conformance with the International Standards for the Professional Practice of Internal Auditing. For more information on our auditing process, including recommendation priority rankings, the follow-up process, and management's responsibility for internal controls, visit <u>auditor.lacounty.gov/audit-process-information</u>.