

Recommendations for improvement at IACC

September 29, 2008

After reviewing the results of the investigators' reports and recommendations as presented on 9/10/08, we respectfully submit the following detailed recommendations for the consideration of the IACC board and the city of Indianapolis.

Legal accountability and urgency of action

1. As independent investigations have substantiated claims of a pattern of mistreatment of animals in violation of Indianapolis ordinance, and IACC's operating requirements as defined by ordinance, the city should accept and acknowledge these violations and issue citations and/or take appropriately serious disciplinary action to responsible individuals at IACC. If individuals cannot be identified, then the kennel manger and supervisors should bear the disciplinary and/or legal consequences, as these violations all fell within their responsibility and represented failures within the kennel.
2. As examples of very questionable judgment in mixing parvo-positive animals with general kennel population, and leaving a tranquilized dog unattended until the dog died from unknown causes (rather than being transported directly to VCA per IACC policy F-024) have happened as recently as the week of September 22-26, the city must acknowledge that serious and immediate attention to the situation is required. It is no more tolerable for continued violations at IACC than at any other city divisions, and if necessary, IACC operations should be suspended until programs/systems can be implemented to ensure operation of IACC is within the standards established by Indianapolis ordinance.

Probationary period

1. As independent investigations have substantiated claims of the mistreatment of animals in direct and obvious violation of law and IACC policy, and as questions posed to IACC management at public board meetings regarding such incidents yielded false or misleading answers, IACC should be placed on a probationary period.
2. During this probationary period, members of the IACC Board, and/or their designated representative(s) can and will visit at random intervals at any time when the IACC building is staffed and be granted access to all areas of the facility and all logs and records. An IACC staff member may accompany the IACC Board member(s) or designated representative(s) to ensure safety and relevant staff privacy concerns are considered.
3. The probationary period will remain in effect until such time as the IACC Board votes that the probationary period is no longer necessary.
4. During the probationary period, a veterinarian or veterinary technician not employed by or under contract with the city should be regularly involved in inspection and oversight activities.
5. During the probationary period, a remotely accessible camera should be installed and active in the euthanasia room. The camera should be accessible via Internet to the IACC Board or their designated representative(s).

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Animal-centered focus

1. Policies and procedures need to be reviewed and revised to ensure that all IACC employees understand that the care of the animals is a top priority within IACC.
2. This animal-centered focus needs to be reflected in all policies and procedures and needs to be emphasized in all training.
3. The animal-centered focus also needs to be reflected in disciplinary actions, up to and including suspension and termination, taken against those who do not demonstrate these values in their work practices.

Training

1. All managers and staff need to receive classroom education covering all relevant policies and procedures of their job.
2. All employees should be required to pass a written test to ensure that all policies and procedures relevant to their job are understood.
3. Policies and procedures manuals should be available in several places around the facility to answer questions, should they arise and supervisors or managers be unavailable or unable to answer questions posed by staff or volunteers.
4. It is the responsibility of the department managers to ensure employee compliance and understanding of policies and procedures in their department. Failure to ensure employee compliance and understanding of policies and procedures, or to discipline employees who fail to learn or comply shall mandate disciplinary action, up to and including suspension and termination, against the relevant department manager.

Temperament testing

1. Temperament testing policies and procedures at IACC need to be overhauled. Because of lapses of care & treatment, dogs “fail” because they are hungry or not exercised sufficiently, or because the guidelines used fail to account for breed or age-specific behaviors (for instance, “mouthiness” being a common trait in puppies).
2. Local and national trainers and temperament testing experts should be consulted to select/build a temperament testing program that is effective and rational and can identify only dogs that represent a true hazard to the public.
3. Only staff and/or volunteers that have been thoroughly and expertly trained should be allowed to perform temperament testing.
4. The kennel manager shall provide a report to the board monthly that indicates the number of dogs euthanized due to being “failed” in temperament testing.

Data quality control

1. All access to Chameleon software should be through individually assigned access codes.
2. All information added or changed on an animal's record(s) in Chameleon should contain the initials of the person making the change and the date (e.g. JQD – 09/17/08)
3. It shall be the responsibility of the kennel manager to monitor and ensure compliance with all kennel-related activities being properly recorded in Chameleon.
4. Records within Chameleon should be available for inspection at any time by the IACC Board or designated representatives to ensure compliance.

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Access to emergency veterinary care by ACO's

1. Animals in obvious trauma (bleeding, broken bones, unable to stand or more) need immediate access to veterinary care or euthanasia, if required.
2. After hour emergency euthanasias should be performed at an emergency veterinary facility only, not by IACC employees in the field.
3. Supervisor approval should not be required when urgent medical care is required.
4. Access to emergency veterinary care should be available 24 hours a day, 7 days a week.
5. Animals in need of emergency medical care should be transported to an emergency veterinary facility within 1 hour of pickup by an officer in the field.
6. No ill or injured animal requiring emergency care should be returned to IACC, but should only go to an emergency veterinary facility for treatment or euthanasia, as deemed appropriate by attending veterinarian.
7. A veterinarian or veterinary technician should be available for consultation by phone if necessary to determine the degree of urgency of care required when an ACO is uncertain.
8. Necessary notes in Chameleon or on a log (as necessary) should be made to ensure that the animal receives very timely care upon return to IACC, or early the next day, if animal is impounded after hours.
9. Failure by an ACO to properly identify animals known to need medical care would result in disciplinary action, including suspension and dismissal.

Proper evaluation and vaccination on every animal at intake

1. Every animal must be examined within 12 hours of intake by the kennel manager, veterinarian or veterinary technician, or specially trained kennel staff member and the animal's weight and description (and preferably photograph) should be entered into Chameleon. The examination should visually look for injuries or nasal discharge, or signs of fur loss, or serious fur matting, fleas, and should ensure that the animal can stand and walk in an upright and balanced manner.
2. Every animal must be given all vaccinations, at the time of evaluation, as outlined in vaccination policy. Records of the vaccination, including the serial number, manufacturer and expiration date must be noted in Chameleon.
3. Every animal must be given a Capstar or proven effective topical flea medication such as Revolution, Frontline or Advantage, and only a medication appropriate for their weight and species, unless otherwise directed by a veterinarian.
4. If during the examination, serious injuries or illness are noted, they should be assessed to determine the urgency of treatment required. Consultation should be made as necessary with a veterinarian if there is uncertainty about the urgency of treatment required.
5. It is the responsibility of the kennel manager to ensure compliance.

Timeliness of treatment for serious injuries or illness

1. Upon the recommendation of a veterinarian, animals requiring euthanasia to end irremediable suffering should be euthanized immediately. No more than 1 hour must elapse. The time and details of the diagnosis must be recorded in Chameleon.
2. It is the responsibility of the kennel manager to ensure that no animal suffers for more than 1 hour upon veterinarian recommendation of euthanasia. If an animal is not euthanized within 1

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hour of the veterinarian recommendation, the responsible staff member(s) should be subject to discipline, including suspension and dismissal.

3. Attending veterinarian shall keep records of any animals recommended for euthanasia, including the animal's IACC ID, the date/time the animal was seen and the reason for euthanasia. Copy of records shall be submitted monthly and kept on file by the kennel manager and made available for inspection at any time upon request of the IACC Board or designated representatives.

Diagnosis and treatment of injury/illness

1. Animals that are ill or injured should be diagnosed by a veterinarian and treated the same day. This consultation can occur in person, by e-mail or over the phone and the treatment can be done by the veterinarian, veterinary technician, or specially trained IACC staff.
2. Dispensing or use of prescription drugs must occur only under the orders and/or supervision of a veterinarian, and the veterinarian must record such orders.
3. Only veterinarians, veterinary technicians, or specially trained staff shall give prescription or injectable medications, and only when ordered by a veterinarian. Improper use of drugs or syringes can lead to injury, infection or even death.
4. Prescription medications and syringes should be kept in a location controlled by the kennel manager, and the dispensing of such items must be recorded on the animal's record in Chameleon.
5. It is the responsibility of the kennel manager to ensure compliance.

Animal handling

1. Under no circumstances must an animal be struck, choked, kicked or handled with excessive (defined as more than the minimum force reasonably required for safe handling) force.
2. Staff should be trained in species and breed-appropriate minimum-force handling techniques.
3. Use of abusive force that causes injury or undue distress, screaming or thrashing to an animal shall mandate immediate disciplinary action, with a required suspension or dismissal.
4. Anyone witnessing excessive or abusive treatment of animals must report it immediately to a supervisor, manager or administrator immediately. Anyone failing to report such mistreatment will be subject to disciplinary action, including suspension and dismissal.

Control sticks and other devices

1. Animal handling procedures and policies should be reviewed and revised, and training conducted as required to ensure that control poles or other devices are used only when appropriate for the species and size of animal, for movement of animals short distances, (no more than 5 feet) and never used for walking the animal.
2. Control sticks and claw or tong devices are never to be used on cats, as they are unsafe for use on cats.
3. Using control sticks in an excessive manner to cause distress to an animal shall mandate immediate disciplinary action, with a required suspension or dismissal.

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Euthanasia

1. Prior to euthanasia, all animals (regardless of age) must be sedated using a SQ (subcutaneous) or IM (intramuscular) injection. Only comatose animals are excluded from this policy.
2. All animals are to be euthanized by IV injection only post pre-sedation.
3. Due to the difficult nature of giving euthanasia drugs via intravenous injection, all animals must be sedated prior to euthanasia..
4. Once sedation is applied, no animal should be removed from their cage until the sedative has taken effect. If there is no obvious effect within 10 minutes, an additional sedative dose should be applied.
5. In addition to the legally mandated requirements for recording the use and administration of controlled euthanasia and sedation drugs, any animal that is not sedated or not euthanized via IV injection must be noted in Chameleon, along with the reason.
6. Because euthanasia is an involved process, it should be done only by veterinarians, veterinary technicians, or those who are trained to properly administer IV injections properly.
7. Per existing policies, animal death must be confirmed by three methods: using a stethoscope to ensure no heart beat, observing and listening with a stethoscope to ensure there is no respiration and checking to ensure there is no pupil or reflex response.
8. Per existing policies, only one animal at a time should be allowed in the euthanasia room.
9. Dead animals should be removed from the euthanasia room before a live animal is brought in.
10. If death does not occur within 5 minutes after administration of euthanasia solution, an additional dose must be given.
11. Any animal showing signs of conscious distress (as opposed to unconscious reactions to the drugs) must be immediately be re-sedated and no further attempts to euthanize or handle the animal shall be made until the animal is no longer showing signs of conscious distress.
12. After being euthanized, animals must be placed in the freezer until the bodies are removed.
13. It is the responsibility of the kennel manager to ensure compliance.

In-Kennel (non-euthanasia) deaths

1. Although a few in-kennel deaths may be unavoidable, most can be avoided. To determine areas of weakness and improvement, the kennel manager shall file a report for each in-kennel death. The report should include all information from Chameleon, as well as copies of cleaning & feeding log from the cage, records of any medications administered and any veterinarian records pertaining to the animal.
2. These reports should be presented in their entirety at least monthly to the IACC Board or their designated representatives.
3. Failure to provide such report in the case of each in-kennel death shall mandate disciplinary action, including suspension and termination.

Rabies testing

1. Axes, saws or equipment that causes the splattering of spraying of blood and bodily fluids should not be used during the removal of the heads of animals for rabies testing. The use of sharp knives or scalpels and surgical techniques are strongly recommended.
2. Staff must wear protective clothing and face protection while removing the head.

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3. Staff performing head removal must receive a prophylactic rabies vaccination at least 2 weeks prior to beginning this task.
4. Removed heads should be refrigerated (not frozen) until transport to the appropriate testing agency is affected.
5. Staff who will be performing the removal of heads must be trained by a veterinarian or veterinary technician in safe techniques for head removal and handling of the head and carcass.
6. It is the responsibility of the kennel manager to ensure proper training and compliance.

Care & treatment logs

1. Every animal should have a log attached to their kennel/cage. The log will indicate the date, time and initials of every person who cleans, inspects or provides food/water for the animal.
2. Such logs must be retained on file for at least 6 months after the animal has left the facility and made available for inspection upon request by the IACC Board or designated representatives.
3. It is the responsibility of the kennel manager to ensure compliance and retention of the logs.

Food & water

1. All animals must be guaranteed adequate clean water at all times, except for short periods (no more than ½ hour) during cleaning or movement to a new cage or kennel.
2. All animals must be guaranteed nutritious, uncontaminated food of sufficient type for their breed and species and in sufficient quantities for their size at all times, except for short periods (no more than ½ hour) during cleaning or movement to a new cage or kennel.
3. All cats/kittens must be offered canned food. Dogs that are not eating dry food within 24 hours must be offered canned food as well. All food is to be removed and refilled daily if not eaten.
4. If an animal spills or contaminates their food or water, it should be noted on the care & treatment record affixed to their cage or kennel. An alternate type or location of food or water bowl should be used if an animal spills or contaminates their food or water (e.g. bowls affixed to the cage door, or supported by a stand or frame).
5. It is the responsibility of the kennel manager to ensure compliance.

Housing

1. All animals must be kept in appropriate size cages.
2. Cats must have a minimum cage size of 24" x 18", and 16" high to allow adequate room for litter box, bedding, food, water bowls and able to move freely around. Smaller cages are permitted for temporary housing – no more than 1 hour.
3. Cats must have a shelf or bag or box to hide in if severely stressed.
4. Dogs must be kept in a cage or kennel that is dry, clean, and free of feces and urine and provided with cloth bedding (such as a towel). Dogs need to be walked at least twice a day, preferably more. Dogs must be removed from cage/kennels while the cage/kennel is being washed, sanitized or power-washed.
1. It is the responsibility of the kennel manager to ensure compliance.

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Cleaning

2. Review and revise all cleaning policies and procedures. Procedures should make cleaning possible and practical and should ensure that cleaning procedures help control possible spread of disease and parasites.
3. To facilitate cleaning, adequate and ample cleaning supplies must be posted in stated and conspicuous locations in every kennel, along with instructions/procedures for cleaning.
4. A list of the cleaning supplies should be posted at each cleaning station to simplify replenishing supplies.
5. It is the job of all employees to clean a kennel when they see it needs to be cleaned.
6. Mops, brooms, scrapers, brushes, etc. must not be removed from the designated kennel. Such tools should be clearly labeled with the location where it is to reside.
7. The kennel manager and kennel supervisors shall check the cleaning supplies in each kennel at the beginning of each shift and replenish as necessary.
8. Have specifically trained people mix disinfectant chemicals and verify proper concentration of mixed disinfectant chemicals by visually comparing a freshly mixed sample known to be of proper concentration.
9. It is the responsibility of the kennel manager to ensure compliance.

Identification

1. All IACC employees below manager level should wear clothing that allows them to be readily identified as IACC employees, even from a distance.
2. All IACC employees at any level should wear a name tag identifying their name and job title. The name tag should be worn conspicuously and at all times while working.
3. The name tag should be worn at the location of a left breast pocket (regardless of whether or not there is a pocket on the shirt/top), unless it is physically impossible to do so, in which case it may be worn at the same location on the right side of a shirt/top.
4. Temporary name tags are to be available and used in the event a new employee does not yet have a name tag or employee loses or forgets a name tag.
5. Failing to wear a name tag shall mandate disciplinary action, including suspension and dismissal.

Respectfully submitted on September 29, 2008

***by Greg Brush
C.E.O., Feral Bureau of Indiana, Inc.***

On behalf of the 51 concerned citizens that collectively filed the grievance with the IACC advisory board on August 10, 2008.