



A Report  
to the  
Board of  
Supervisors

*Maricopa County  
Internal Audit  
Department*

**Ross L. Tate**  
County Auditor

Limited Scope Review

# Pet Licensing

*Performance Review of  
Animal Care & Control's  
Pet Licensing Activity*

July ■ 2006

Executive Summary .....	1
Introduction .....	2
Detailed Information .....	5
Department Response .....	16

The **County Auditor** is appointed by the Board of Supervisors. The mission of the Internal Audit Department is to provide objective, accurate, and meaningful information about County operations so the Board of Supervisors can make informed decisions to better serve County citizens.

***The mission of Maricopa County is to provide regional leadership and fiscally responsible, necessary public services so that residents can enjoy living in a healthy and safe community.***

### Audit Team Members

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Many of our reports can be found in electronic format at:  
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July 31, 2006

Don Stapley, Chairman, Board of Supervisors  
Fulton Brock, Supervisor, District I  
Andrew Kunasek, Supervisor, District III  
Max Wilson, Supervisor, District IV  
Mary Rose Wilcox, Supervisor, District V

We have completed our review of the Maricopa County Animal Care and Control's Pet Licensing activity. This audit was performed in accordance with the annual audit plan approved by the Board of Supervisors. The specific activity reviewed was selected through a risk-assessment process.

Report highlights include:

- Pet Licensing recently has shown improvement in service quality and performance measures
- Recent license fee increases should increase revenue but may not result in full cost recovery
- Nine of ten MFR Performance Measures were certified as accurate

Within this report you will find an executive summary, specific information on the activity reviewed, and Animal Care and Control's responses to our recommendations. We reviewed this information with Animal Care and Control, and appreciate the excellent cooperation provided by management and staff. If you have any questions or wish to discuss the information presented in this report, please contact Eve Murillo at 506-7245.

Sincerely,

A handwritten signature in cursive script that reads "Ross L. Tate".

Ross L. Tate  
County Auditor

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# Table of Contents

<b>Executive Summary . . . . .</b>	<b>1</b>
<b>Introduction . . . . .</b>	<b>2</b>
<b>Detailed Information . . . . .</b>	<b>5</b>
<b>Alignment of Performance Measures . . . . .</b>	<b>5</b>
<b>Licensing Requirements and Guidelines . . . . .</b>	<b>8</b>
<b>License Fee Structure . . . . .</b>	<b>9</b>
<b>Performance Measure Certification . . . . .</b>	<b>10</b>
<b>Department Response . . . . .</b>	<b>15</b>

# Executive Summary

## **Alignment of Performance Measures (Page 5)**

Organizational and operational changes negatively impacted Pet Licensing revenues, service quality, and performance outcomes from FY 2002 to FY 2005. However, reestablishing the licensing function in-house reversed this trend and resulted in a 2005 Showcase in Excellence award from the Arizona Quality Alliance. With the completion of this changeover in FY 2006, Pet Licensing should review and document its action plan, evaluate and align its objectives, and evaluate the relevance of its performance measures.

## **Licensing Requirements and Guidelines (Page 8)**

Animal Care and Control's (ACC) policy of voluntary cat vaccinations and licensing complies with Arizona statutory requirements. However, national animal care and control associations advocate rabies vaccinations and licensing for cats as well as dogs. Additionally, State rules require proof of vaccination for cats as well as dogs entering Arizona. ACC should consider raising public awareness of current cat-related rabies threats.

## **License Fee Structure (Page 9)**

Although license fees were recently increased, the new pricing structure may not achieve a full cost recovery for services provided. ACC should consider performing a fee impact analysis to determine impact of changes upon licensing revenue and compliance, and alerting cities of any inconsistency with the new fee structure.

## **Performance Measure Certification (Page 10)**

Our review of ten Pet Licensing performance measures (three of which are key measures), developed for the Managing for Results program, found that the department's data collection procedures are reliable and Pet Licensing accurately reports its Key Results Measures, except for the cost-per-cat license measure. The measure is not accurate and the department was not able to provide cost data to support the reported efficiency results. The department needs to utilize a reliable source for cost data and develop written procedures for collecting and reporting the data.

# Introduction

## Department Mission, Vision, and Goals

We completed a review of the Pet Licensing activity in Animal Care and Control (ACC). ACC’s mission as stated in its strategic plan is “to promote the health, safety, and welfare of people and pets in Maricopa County.” The vision of the department is to strive to “reduce the dangers and nuisances caused by irresponsible pet ownership and to protect pets from abuse, neglect, and homelessness.”

The purpose of dog and cat licensing activities is to provide licensing services to the people of Maricopa County so the spread of rabies can be controlled and citizens can recover lost pets. ACC has five goals, one of which specifically relates to Pet Licensing. This goal was established in fiscal year 2005: “By June 2006, increase the compliance rate for issuance of dog licenses by 2.5 percent from the FY 2004 level.”

## Performance Measures

Dog and cat licensing, specific activities within Pet Licensing, include the following FY 2006 performance measures:

<u>Efficiency</u>	Cost per cat license issued Cost per dog license issued
<u>Key Results</u>	Dog licenses issued as a percent of total County dog population Cat licenses issued as a percent of total County cat population
<u>Other Result</u>	Percentage of dog licenses issued within two weeks

## Scope & Methodology

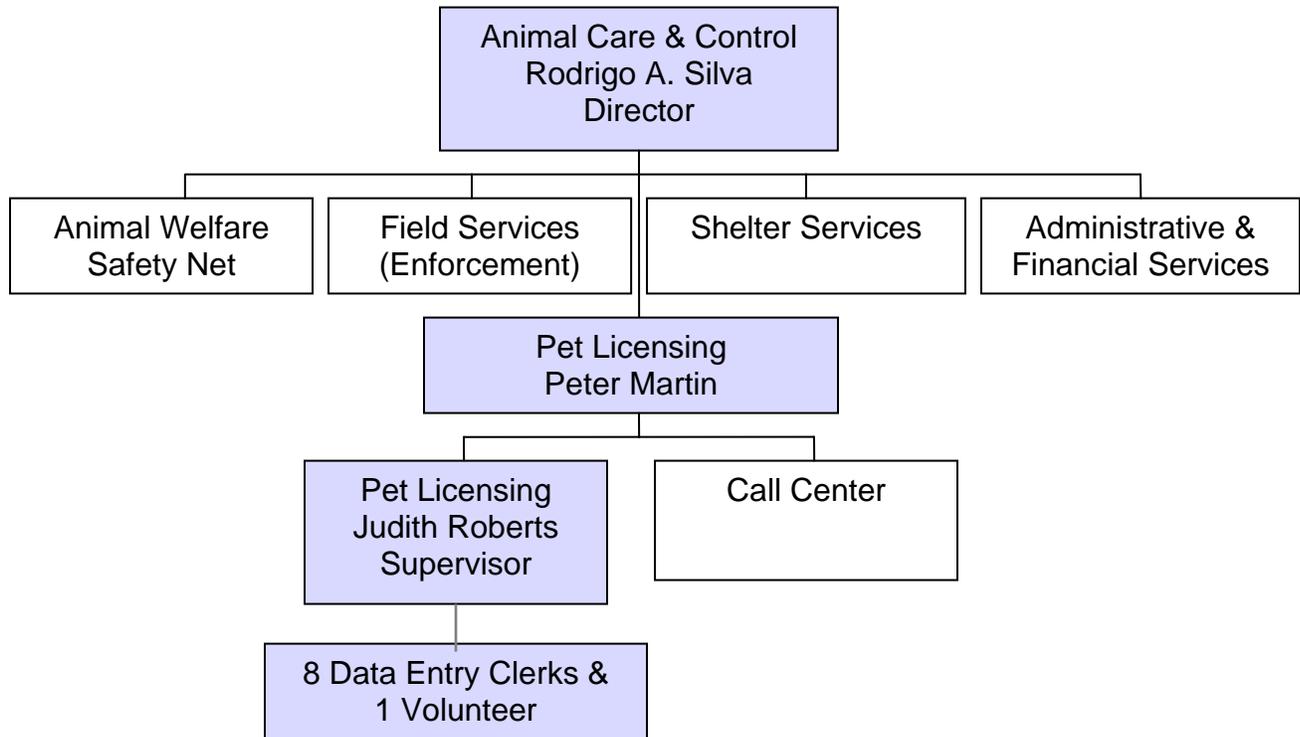
The objectives of this audit were to determine if Pet Licensing effectively:

- Meets its goals and purpose, identified in its Managing for Results (MFR) plan
- Performs activities in accordance with state statutes and other regulatory requirements
- Structures fees and other licensing charges to maximize revenue
- Provides accurate and relevant performance data to County management

We reviewed performance data for the period FY 2002 through FY 2006. This audit was performed in accordance with generally accepted government auditing standards.

## Organizational Structure

Pet Licensing has 10 employees, a Licensing Director, a Licensing Supervisor, and eight Data Entry Clerks, as shown below.



## Background

Animal Care and Control (ACC), established in 1967, operates under Arizona Revised Statutes which give the Board of Supervisors power to set dog licensing fees and issue durable tags. Statutes stipulate that no dog shall be licensed without rabies vaccination certification.

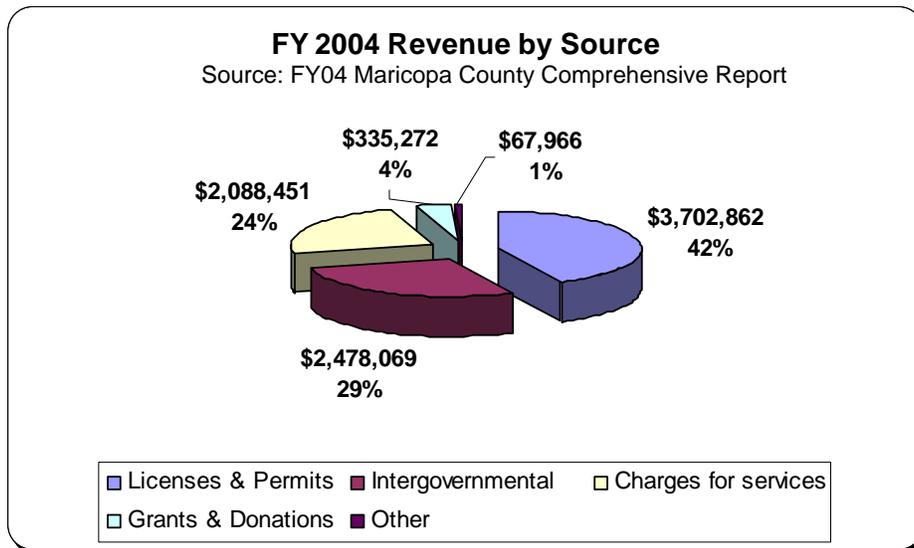
Pet Licensing experienced significant organizational and operational changes during the period under review. Within a 30 month period, from January 2002 to August 2004, the Pet Licensing program underwent three major operational changes. In January 2002, with demand outstripping resources, the pet licensing process was outsourced to a private firm. Eighteen months later, in September 2003, the contract with the private firm was terminated due to nonperformance. The process was then outsourced to Arizona Correctional Industries (ACI), Department of Corrections. Six months later the process was reestablished in-house in partnership with Chase Bank (formerly Bank One). The contract with ACI was terminated in September 2004 due to nonperformance. ACC also changed directors during this time period.

Given this unstable environment, performance objectives and measures were inconsistent and results were difficult to trend or benchmark, as explained in detail under the Issues section of this report.

## Financial Information

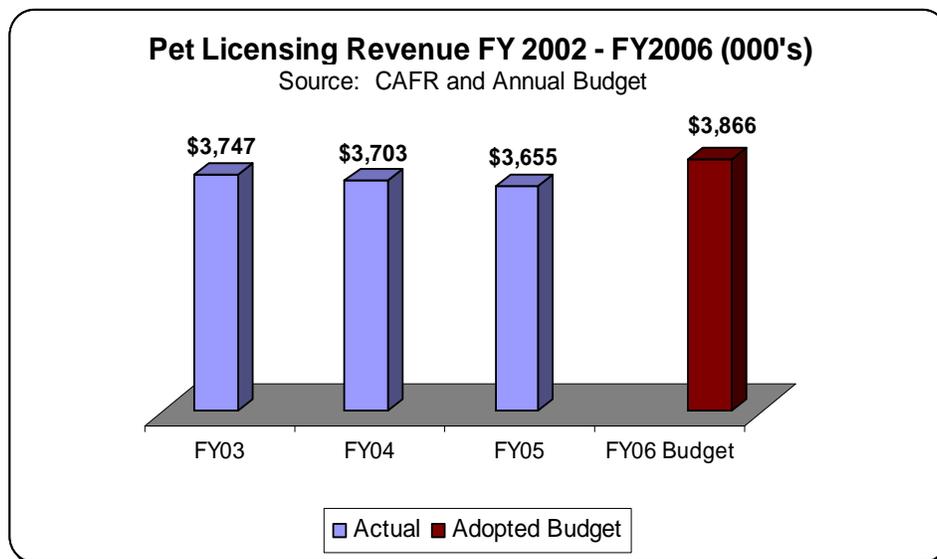
ACC has three primary sources of revenue – licensing fees, intergovernmental agreements for enforcement field services, and shelter and adoption services charges. In FY 2003 Pet Licensing fees constituted \$3.7 million, or 48 percent of the \$7.9 million ACC revenue, as shown below.

In accordance with statute, ACC places all revenues in special revenue funds. The two primary fund categories are Animal Control (revenues from licensing and adoption services) and Animal Control Field Services (revenues from enforcement services).



Note: 2004 most recent CAFR information available

Pet Licensing revenue has remained relatively stable over the past five fiscal years, trending from \$3.5 million to \$3.7 million as shown below.



# Issue 1 Alignment of Performance Measures

## Summary

Organizational and operational changes negatively impacted Pet Licensing revenues, service quality, and performance outcomes from FY 2002 to FY 2005. However, reestablishing the licensing function in-house reversed this trend and resulted in a 2005 Showcase in Excellence award from the Arizona Quality Alliance. With the completion of this changeover in FY 2006, Pet Licensing should review and document its action plan, evaluate and align its objectives, and evaluate the relevance of its performance measures.

## Effects of Operational Approach on Performance Results

In FY 2005 Pet Licensing focused its efforts on reestablishing the licensing process in-house after two unsuccessful outsourcing attempts (Pet Data in FY 2003, Arizona Department of Corrections in FY 2004). In June 2005, Pet Licensing implemented a new software system that integrates its Pet Licensing database with two primary service vendors:

- Chase Bank – provides front-end payment and data entry processing
- Sourcecorp – provides printing and distribution handling of license renewals

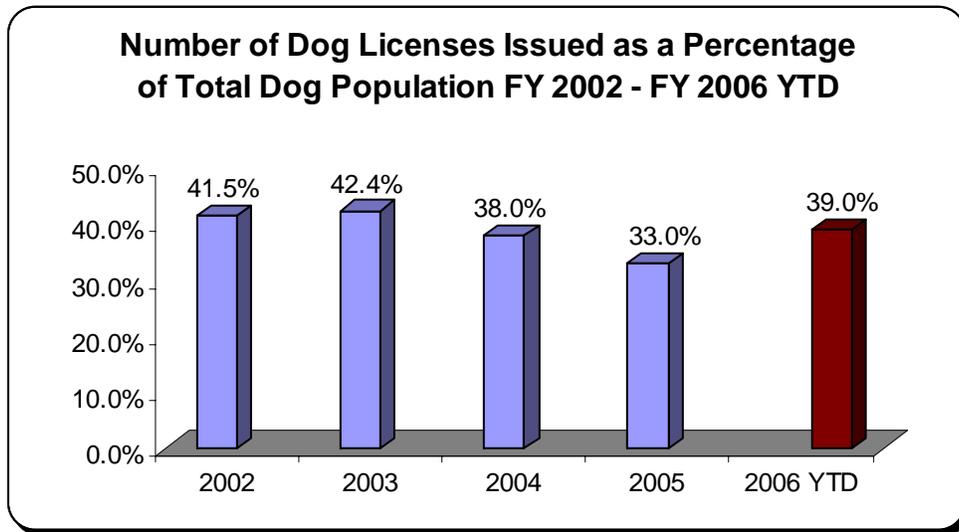
By outsourcing these two system functions, Pet Licensing has been able to maintain a level of data quality and control standards that were unachievable when the entire service was outsourced. ACC statistics show data quality has improved accordingly:

- Customer call volume for licensing status issues has steadily declined from 4,300 calls in May 2004 to 1,700 in April 2005
- License renewal turnaround time improved from an average turnaround of 17 days in FY 2003 to 5 days in Aug 2004 and 2 days in April 2005.
- Random error rates declined from 1.64 percent in June 2004 to .01 percent in May 2005

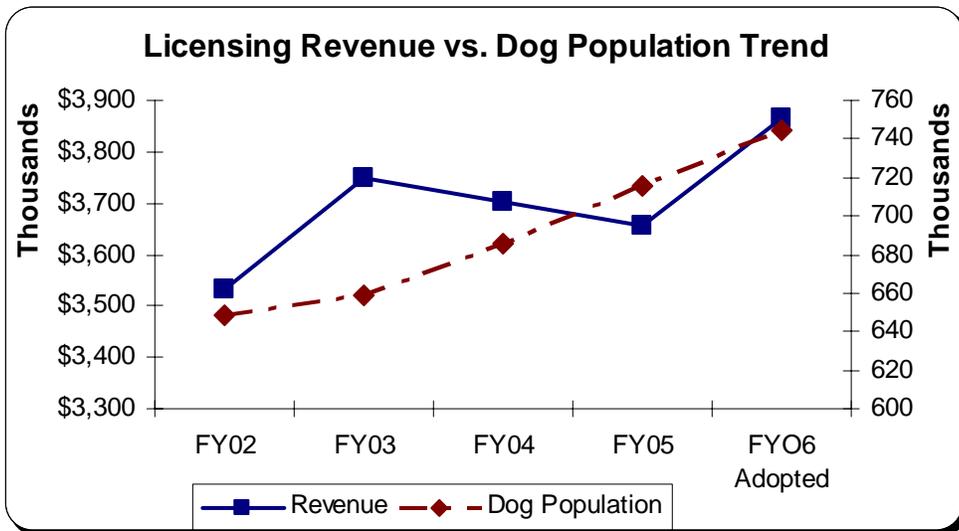
Pet Licensing Provider Changes (FY 2002 – FY 2006)				
FY 2002	FY 2003	FY 2004	FY 2005	FY 2006
	<b>Pet Data</b>  2/02 – 9/03			
		<b>Dept of Corrections</b>  9/03– 9/04		
			<b>In-house</b>  4/04 – present	

With the focus in FY 2005 on system implementation and data integrity issues, Pet Licensing was unable to make substantial progress on key performance results, or to align performance measures with department goals and objectives. For example, the number of dog tags issued, a key revenue driver, declined from FY 2003 to FY 2005. The number of tags issued as a percent of the County dog population declined from a high of 42 percent in FY 2003 to 33 percent in FY 2005.

Pet Licensing has reversed this downward trend in the current fiscal year as a result of license renewal process improvements. The FY 2006 year-to-date rate is 39 percent.



This trend reversal after ACC reestablished licensing operations in FY05 is also illustrated below, where the County dog population trend is compared to licensing revenue.



## **Benchmarking**

Our research of other benchmark counties did not show consistency in performance measures and, therefore, comparisons could not be made. However, Pima County measures licenses issued on a per capita basis, and reported a rate of .113 pet licenses per capita in FY 2005. For comparison, Maricopa County's FY 2005 pet license issuance rate was .067 per capita. If the people-to-pet ratio is consistent between our counties, this would indicate Pima County licenses almost twice as many pets per capita as ACC.

## **Recommendations**

With improvements in Pet Licensing operations in FY 2006, ACC should consider developing:

- A.** Performance measures that address the two specific Pet Licensing stated objectives of controlling rabies and returning lost pets.
- B.** Customer surveys that align with department objectives.
- C.** Plans for reviewing benchmarks and trend analysis, and working with other animal care & control agencies in the region to identify benchmarking performance measures, specifically a standard approach for defining licensing compliance rates.

# Issue 2 Licensing Requirements & Guidelines

## Summary

Animal Care and Control's (ACC) policy of voluntary cat vaccinations and licensing complies with Arizona statutory requirements. However, national animal care and control associations advocate rabies vaccinations and licensing for cats as well as dogs. Additionally, State rules require proof of vaccination for cats as well as dogs entering Arizona. ACC should consider raising public awareness of current cat-related rabies threats.

## Animal Care and Control Guidelines

Authoritative sources, such as The National Association of State Public Veterinarians (NASPVA) and the Humane Society of the United States (HSUS), recommend that cat vaccinations be required, in addition to dog vaccinations and "local governments should initiate and maintain effective programs to ensure vaccinations of all dogs, cats, and ferrets." NASPVA recommendations are endorsed by the Center for Disease Control, National Animal Control Association (NACA), and American Veterinary Association (AVMA). Additionally, in Arizona Administrative Code, R3-2-616 (Health Requirements Governing Admission of Animals) states "a dog or cat shall be accompanied by a health certificate that documents the animal is currently vaccinated against rabies according to the requirements of the NASPVA Compendium of Animals Rabies Control."

In Maricopa County, licensing of cats is voluntary and less than one percent of cats are licensed.

## Benchmark Counties

We surveyed five Western counties considered Maricopa County peers. Four of the five counties require cats to be licensed and vaccinated for rabies. These are:

- Multnomah County, Oregon
- Los Angeles County (required in unincorporated areas, and in several incorporated areas)
- King County, Washington
- Clark County, Nevada (require veterinarians to issue vaccination tags)

San Diego County does not require cat vaccinations except in the city of Coronado.

## Recommendations

ACC should consider:

- A. Educating the public about current cat-related rabies threats to raise awareness about the potential health risks of unvaccinated cats spreading rabies.
- B. Discontinuing cat licensing activity as a key MFR measure since it is only voluntary (compliance is less than 1%).

# Issue 3 License Fee Structure

## Summary

Although license fees were recently increased, the new pricing structure may not achieve a full cost recovery for services provided. ACC should consider performing a fee impact analysis to determine impact of changes upon licensing revenue and compliance, and alerting cities of any inconsistency with the new fee structure.

## Recent License Fee Increases

In December 2005 ACC revised the pet license fee structure by:

- Increasing fees for altered (spayed and neutered) dogs from \$10 to \$12
- Increasing fees for unaltered dogs from \$25 to \$40
- Introducing a 50 percent fee discount for seniors

Although these fee levels are not consistent with the full cost recovery fee structure recommended by an April 2005 Deloitte & Touche, LLP study, ACC concluded that the new pricing structure was acceptable to citizens and would not reduce compliance rates. Conducting further activity trend analyses and projections would assist the department in determining the impact of fee changes on revenues and expenditures, and improve management decision-making. Additionally, analyzing the fee structure against the department’s strategic goals would further improve management decision-making.

## Benchmarks

The survey of five benchmark counties showed that for counties with centralized licensing functions, Maricopa County has the lowest fee structure for altered dogs. See below.

<b>Comparison of License Fees</b>				
	<b>Maricopa AZ</b>	<b>King WA</b>	<b>Los Angeles CA</b>	<b>Multnomah OR</b>
<b>Altered dogs</b>	<b>\$12</b>	<b>\$20</b>	<b>\$15</b>	<b>\$18</b>
<b>Unaltered dogs</b>	<b>\$40</b>	<b>\$60 + \$25 voucher</b>	<b>\$30</b>	<b>\$30</b>

## Recommendations

ACC should consider:

- Performing fee impact analysis to determine impact of changes upon licensing revenue and compliance.
- Alerting cities of any inconsistencies with the new ACC fee structure.

# Issue 4 Performance Measure Certification

## Summary

Our review of ten Pet Licensing performance measures (three of which are key measures), developed for the Managing for Results program, found that the department's data collection procedures are reliable and Pet Licensing accurately reports its Key Results Measures, except for the cost-per-cat license measure. The measure is not accurate and the department was not able to provide cost data to support the reported efficiency results. The department needs to utilize a reliable source for cost data and develop written procedures for collecting and reporting the data.

## Results Summary Table

Animal Care and Control Performance Measures Summary Table	Certified	Certified with Qualifications	Not Certified
1. Percent of dog licenses issued within two weeks (after receipt of renewal)	✓		
2. Percent of dog licenses issued	✓		
3. Number of dog licenses issued	✓		
4. Number of dog licenses issued within two weeks	✓		
5. Population of dogs in Maricopa County	✓		
6. Cost per dog license issued	✓		
7. Percent of cat licenses issued	✓		
8. Number of cat licenses issued	✓		
9. Population of cats in Maricopa County	✓		
10. Cost per cat license issued			✓

## County Policy Requirements

Maricopa County Board of Supervisors Policy B6001 (4.D Evaluating Results) requires the Internal Audit Department to review County departments' strategic plans and performance measures. The policy also requires that a report of the results be issued. The following information defines the results categories that are used in the certification process.

### Definitions

Certified: The reported performance measurement is accurate (+/-5%) and adequate procedures are in place for collecting/reporting performance data.

Certified with Qualifications: The reported performance measurement is accurate (+/-5%) but adequate procedures are not in place for collecting and reporting performance data.

Not Certified:

- 1) Actual performance is not within five percent of reported performance and/or the error rate of tested documents is greater than five percent.
- 2) Actual performance measurement data could not be verified due to inadequate procedures or insufficient documentation. This rating is used when there is a deviation from the department's definition, preventing the auditor from accurately determining the performance measure result.
- 3) Actual performance measurement data was accurately calculated but not consistently posted to the public database.

### Measure Testing

Key Measure #1: **Percent of dog licenses issued within two weeks (after receipt of renewal)**

Results: **Certified**

Measure #1	FY03	FY04	FY05 Qtr 1	FY05 Qtr 2	FY05 Qtr 3	FY05 Qtr 4	FY05 TOTAL
Reported	--	--	64.2%	66.8%	82.5%	81.5%	74.9%
Actual	--	--	--	--	--	81.5%	--

The measure is accurate and adequate written procedures are in place for collecting and reporting data.

Key Measure #2: Percent of dog licenses issued

Results: Certified

Measure #2	FY03	FY04	FY05 Qtr 1	FY05 Qtr 2	FY05 Qtr 3	FY05 Qtr 4	FY05 TOTAL
Reported	--	--	7.8%	6.5%	8.7%	10.1%	33%
Actual	--	--	--	--	--	10.1%	--

The measure is accurate and adequate written procedures are in place for collecting and reporting data.

Output Measure #3: Number of dog licenses issued

Results: Certified

Measure #3	FY03	FY04	FY05 Qtr 1	FY05 Qtr 2	FY05 Qtr 3	FY05 Qtr 4	FY05 TOTAL
Reported	--	--	55,895	46,242	62,020	72,035	236,192
Actual	--	--	--	--	--	72,035	--

The measure is accurate and adequate written procedures are in place for collecting and reporting data.

Output Measure #4: Number of dog licenses issued within two weeks

Results: Certified

Measure #4	FY03	FY04	FY05 Qtr 1	FY05 Qtr 2	FY05 Qtr 3	FY05 Qtr 4	FY05 TOTAL
Reported	--	--	35,880	30,875	51,145	58,960	176,860
Actual	--	--	--	--	--	58,933	--

The measure is accurate and adequate written procedures are in place for collecting and reporting data.

Demand Measure #5: Population of dogs in Maricopa County

Results: **Certified**

Measure #5	FY03	FY04	FY05 Qtr 1	FY05 Qtr 2	FY05 Qtr 3	FY05 Qtr 4	FY05 TOTAL
Reported	--	--	715,940	715,940	715,940	715,940	715,940
Actual	--	--	--	--	--	715,940	--

The measure is accurate and adequate written procedures are in place for collecting and reporting data.

Efficiency Measure #6: Cost per dog license issued

Results: **Certified**

Measure #6	FY03	FY04	FY05 Qtr 1	FY05 Qtr 2	FY05 Qtr 3	FY05 Qtr 4	FY05 TOTAL
Reported	--	--	--	--	--	--	\$2.99
Actual	--	--	--	--	--	--	\$3.09

The measure is accurate (within 5%) and adequate written procedures are in place for collecting and reporting data.

Key Measure #7: Percent of cat licenses issued

Results: **Certified**

Measure #7	FY03	FY04	FY05 Qtr 1	FY05 Qtr 2	FY05 Qtr 3	FY05 Qtr 4	FY05 TOTAL
Reported	--	--	.1154%	.0913%	.0826%	.0759%	.3652%
Actual	--	--	--	--	--	.0758%	--

The measure is accurate and adequate written procedures are in place for collecting and reporting data.

Output Measure #8: Number of cat licenses issued

Results: **Certified**

Measure #8	FY03	FY04	FY05 Qtr 1	FY05 Qtr 2	FY05 Qtr 3	FY05 Qtr 4	FY05 TOTAL
Reported	--	--	910	720	651	598	2,879
Actual	--	--	--	--	--	598	--

The measure is accurate and adequate written procedures are in place for collecting and reporting data.

Demand Measure #9: Population of cats in Maricopa County

Results: **Certified**

Measure #9	FY03	FY04	FY05 Qtr 1	FY05 Qtr 2	FY05 Qtr 3	FY05 Qtr 4	FY05 TOTAL
Reported	--	--	788,287	788,287	788,287	788,287	788,287
Actual	--	--	--	--	--	788,287	--

The measure is accurate and adequate written procedures are in place for collecting and reporting data.

Efficiency Measure #10: Cost per cat license issued

Results: **Not Certified**

Measure #10	FY03	FY04	FY05 Qtr 1	FY05 Qtr 2	FY05 Qtr 3	FY05 Qtr 4	FY05 TOTAL
Reported	--	--	--	--	--	--	\$10.19
Actual	--	--	--	--	--	--	\$4.65

The measure is not accurate. The department was not able to provide cost data to support the reported measure. The department needs to utilize a reliable source for cost data (e.g., ADVANTAGE) and develop written procedures for collecting and reporting the data.

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# Department Response

**AUDIT RESPONSE  
ANIMAL CARE & CONTROL - JULY 24, 2006**

**Issue #1:**

**Alignment of Performance Measures.**

**Response:** Concur. MCACC modified the activity name and purpose statement to reflect the department's objectives. The activity name has been changed to "Dog Licensing Activity". The new purpose statement is: "The purpose of the Dog Licensing Activity is to provide mandated licensing services so that dogs in compliance with the mandates are issued a tag within two weeks or less."

**Recommendation A:** Performance measures that address the two specific Pet Licensing stated objectives of controlling rabies and returning lost pets.

**Response:** Concur – Completed. MCACC modified the activity name and purpose statement to reflect the Department's objectives as indicated above: licensing compliance and the issue of tags within two weeks or less.

**Target Completion Date:** July 1, 2006

**Benefits/Costs:** A truer representation of the activity, purpose and objectives of the department.

**Recommendation B:** Customer surveys that align with department objectives.

**Response:** Concur – in process. MCACC does not have a customer survey; however, the department is working with Maricopa County Research and Reporting in developing a customer satisfaction survey.

**Target Completion Date:** December 1, 2006

**Benefits/Costs:** Potential feedback to improve services to the community thereby increasing licensing compliance and revenue.

**Recommendation C:** Plans for reviewing benchmarks and trend analysis, and working with other County Animal Care & Control agencies in the region to identify benchmarking performance measures, specifically a standard approach for defining licensing compliance rates.

**Response:** Concur - completed. There are significant limitations related to the inexistence of national industry standards. At this time, there are no animal control activity and reporting standards within the industry. Although, the department requests data in specific formats from pre-determined benchmark agencies, the data is not always available with similar standards or format. In some instances, data is not available. Some agencies do not measure certain activities. The Department is working with HLP, Inc., which is the company that developed the animal care and control data base system Chameleon, to sponsor a meeting of animal control decision makers to set standards within the industry.

**Target Completion Date:** Completed – During June 2006, the Department approached HLP with plans to establish national standards. This will not be accomplished unless HLP agrees to sponsor a national meeting of decision makers and an agreement of what standards should be used is reached.

**Benefits/Costs:** A continuity of data enabling agencies to standardize performance measures for benchmarking and trend analysis.

**Issue #2:**  
**Licensing Requirements & Guidelines.**

**Response:** Concur. Mandatory cat licensing, if enacted, would create significant operational and financial burdens for the department and the County. Its benefits do not justify the significant cost of such a regulation. While regulating cats has been attempted in several parts of the country, its success is due to increased enforcement and monitoring. On average, mandatory cat licensing has compliance of 1% or less, except in jurisdictions that deploy costly and unpopular aggressive canvassing programs where compliance averages 14%. The cost of a mandatory licensing program would not be cost effective for the department and in addition, would not be received positively in the community. The data also reflects that, without an aggressive canvassing program, the cat licensing compliance rate would not be increased.

**Recommendation A:** Educating the public about current cat-related rabies threats.

**Response:** Concur - completed. MCACC continuously utilizes media and other resources to advise the public of cat diseases, including rabies and other cat-related topics.

**Target Completion Date:** Completed.

**Benefits/Costs:** Educating the community on rabies awareness in cats will increase rabies vaccinations and promote the health and safety of cats and people.

**Recommendation B:** Discontinuing cat-licensing activity as a key MFR measure since it is only voluntary (compliance is less than 1%).

**Response:** Concur – Completed

**Target Completion Date:** July 1, 2006.

**Benefits/Costs:** MCACC can better focus on mandated services and the performance measures relating to these services.

**Issue #3:**  
**License Fee Structure.**

Response: Concur.

**Recommendation A:** Consider performing fee impact analysis to determine impact of changes upon licensing revenue and compliance.

Response: Concur - Completed

Target Completion Date: Completed

**Benefits/Costs:** If necessary, the Department may recommend to the Board of Supervisors a new fee adjustment in FY 09. A new adjustment would allow the Department to continue full-cost recovery, ensuring the sound operation of the planned new facility. In addition, a fee adjustment would also allow the Department to contemplate the possibility of renovating the East Valley shelter or to build a West Valley Shelter.

**Recommendation B:** Review stated fees in city ordinances and alert cities and towns whether they are consistent with the new MCACC fee structure.

Response: Concur – Completed. MCACC issued a letter to all cities and towns notifying them of the fee changes and had a meeting prior to enacting the fee change to explain details and answer questions. The department cannot ensure that the city ordinances are changed as it is out of the scope of our authority. We will remind the cities again at our biannual meeting.

Target Completion Date: Completed

**Benefits/Costs:** Consistency between MCACC and the cities and towns will provide citizens with accurate, up-to-date information and decrease confusion.

**Issue #4:**  
**Performance Measure Certification.**

Response: Concur.

**Efficiency Measure #10:** Cost per cat license issued.

Response: Concur. The Cat Licensing Activity will not be a part of MFR.

Target Completion Date: July 1, 2006

**Benefits/Costs:** There is no societal or financial benefit to mandatory cat licensing since it would be cost prohibitive from an enforcement prospective.

Approved By :

Philip Zilka  
Department Head

6/29/06  
Date

Shelly Schaubach for  
Chief Officer Tom Manos

7/25/06  
Date

D. R. Sautt  
County Manager

7/25/06  
Date