OFFICE OF THE INSPECTOR GENERAL
MONTGOMERY COUNTY MARYLAND

MEGAN DAVEY LIMARZI, ESQ.
INSPECTOR GENERAL

Review of the Office of Animal Services

OIG Publication # 27-6

November 5, 2026

51 MONROE STREET, SUITE 600 | ROCKVILLE, MARYLAND 20850
240 777 8240 | MONTGOMERYCOUNTYMD.GOV/OIG

EXECUTIVE SUMMARY

The Office of Animal Services' Montgomery County Animal Services and Adoption Center (ASAC) is the County's only open-admissions municipal shelter, providing care and shelter for homeless, abused, and neglected animals. Recognizing that other regulatory entities routinely evaluate ASAC's veterinary operations and handling of controlled substances, we chose to review ASAC's tracking of donations and adherence to training requirements. The community actively supports ASAC through monetary and in-kind donations, with monetary donations of $35,498 in FY25 and $101,981 in FY26. We found that ASAC staff generally follow established procedures for receiving monetary donations, though we noted that there is no formal process for staff to request that donated funds be used for a particular matter. We also found that ASAC does not track in-kind donations. Additionally, our review revealed that some ASAC divisions did not have written training requirements and were not consistently maintaining records or verifying compliance with training requirements.

OBJECTIVES

Through this review we sought to (1) evaluate OAS's process for accepting, tracking, and safeguarding in-kind and cash donations, and (2) determine whether individuals have completed all required training in accordance with OAS policies.

SCOPE AND STANDARDS

Our review was conducted from June through September 2026 and was conducted in accordance with the Association of Inspectors General, *Principles and Standards for Offices of Inspectors General, Quality Standards for Inspections, Evaluations, and Reviews (July 2024)*.

RESULTS

OAS could not provide evidence that all required training had been completed for all applicable personnel.

RECOMMENDATIONS

We recommend that OAS implement formal written policies mandating that all training requirements are documented and that records of completed training are retained.

TABLE OF CONTENTS

Executive Summary i

Background 3

Findings and Recommendations 6

OIG Comments to Chief Administrative Officer Response 8

APPENDIX A: CHIEF ADMINISTRATIVE OFFICER (CAO) RESPONSE 9

APPENDIX B: RECOMMENDATION STATUS AND FOLLOW UP 11

BACKGROUND

The Montgomery County Animal Services and Adoption Center (ASAC), operated by the Office of Animal Services (OAS), is a 49,000-square-foot facility situated on seven acres. The facility includes animal shelter and quarantine areas, a veterinary suite, an adoption center, outdoor fenced exercise areas and walking trails. It also serves as a quarantine facility for animals suspected of zoonotic diseases and provides forensic exams on animals that are evidence in crimes. Staff and volunteers provide stray, lost, surrendered, abused and neglected animals, including dogs, cats, rabbits, reptiles, birds, and wildlife, with daily support, veterinary treatment, and mental and physical enrichment. In fiscal year (FY) 2025, over 7,000 animals received services at the facility. ASAC also reunites lost pets with their owners, places animals in foster and permanent homes, offers spay and neuter assistance, vaccination clinics, education programs, and community outreach.

ASAC is licensed by the Maryland Board of Veterinary Medical Examiners (Board), the U.S. Drug Enforcement Administration (DEA), and the Maryland Department of Health's Office of Controlled Substances Administration (Health Department). OCSA and the Board conduct periodic inspections of ASAC evaluating various operational practices such as veterinary protocols and the storage and administration of controlled substances. ASAC's veterinarians hold licenses from the Board, DEA, and the Health Department, while its veterinary technicians are licensed by the Board.

In 2023, OAS received a pro-bono operational consult from Maddie's Million Pet Challenge.[1] The main objectives of the consult were to identify ways to reduce shelter intake and the length of stay for shelter pets, which included improving program efficiencies and population management. The resulting report provided a list of recommended action steps, most of which OAS has implemented. ASAC is currently working collaboratively with the Best Friends Animal Society [2] Shelter Veterinarian team, who are experts in shelter management and shelter medicine, to develop clear protocols, standing orders, and processes that will help OAS to work more efficiently and effectively.

Given that ASAC is subject to regulatory inspections regarding their handling of controlled substances, as well as the recent evaluation of shelter operations by external entities, we

[1] MMPC is a partnership between Team Shelter USA, the University of Florida, the University of California at Davis, and Open Door Veterinary Collective. MMPC is funded by Maddie's Fund, a non-profit foundation, whose mission is to revolutionize the status and well-being of companion animals.
[2] ASAC is a network partner of Best Friends Animal Society, a nonprofit organization dedicated to saving shelter animals.

decided to focus our review on the receipt and tracking of donations and adherence to training requirements for staff and volunteers.

Donations

While it has always been permissible for OAS to receive donations, until recently it was prohibited from proactively seeking donations. An Executive Order issued in August 2024 lifted that restriction and allowed OAS to begin soliciting donations. OAS launched an online donation portal in FY2025. As a result, monetary donations increased significantly. In FY24, OAS received $19,868, while in FY25 and FY26, OAS received monetary donations in the amount of $35,498 and $101,981, respectively. In addition to monetary donations, a significant amount of new and used items, considered in-kind donations, are also received. The types of items donated vary widely and include food, leashes, collars, harnesses, toys, animal beds, litter, crates, cat towers, bird cages, and fish tanks.

In June 2026, after the initiation of this review, OAS implemented a donations policy that established standards for how public contributions are accepted, managed, and used. The policy creates designated donation categories, such as animal enrichment, medical expenses beyond routine care, and capital improvements, allowing a donor to direct their contribution to a specific purpose. The donor can also choose an unrestricted option that allows OAS to allocate the funds where they believe it is most needed. An 'In-Kind Directive', which also became effective in June 2026, outlines the types of items that may be accepted as in-kind donations.

Training Requirements

ASAC's Standards of Care[3] requires that animals receive daily care, mental and physical enrichment, health and wellness checks, and that all staff and volunteers handling animals are trained. The OAS positions that include direct animal-handling responsibilities are animal care attendants, adoption counselors, the foster coordinator, animal behaviorists, staff veterinarians, registered veterinary technicians, veterinary assistants, and volunteers. Training requirements and record keeping practices vary by position and division.

Objectives, Scope and Methodology

Through this review, we sought to (1) evaluate OAS's process for accepting, tracking and safeguarding in-kind and cash donations, and (2) determine whether individuals have completed all required training in accordance with OAS policies.

[3] *MSASAC Standards of Care,* Revised January 2019.

For the first objective, we conducted interviews and walkthroughs to gain an understanding of the monetary and in-kind donation processes. We reviewed records for both monetary and in-kind donations for FY25 and FY26, applicable laws and regulations, and policies and procedures.

For the second objective, we interviewed OAS staff and reviewed the training requirements and records for volunteers and employees[4] who work directly with animals. Using OIG's sampling methodology, we randomly selected 21 of 491 volunteers to determine whether they had completed the training. We chose to test training records for all 28 non-supervisory employees across the three animal-care divisions.[5]

Our review was conducted between June and September of 2026 in accordance with the Association of Inspectors General, *Principles and Standards for Offices of Inspector General, Quality Standards for Inspections, Evaluations, and Reviews* (July 2024).

[4] We reviewed the training requirements of non-supervisory employees only.
[5] Training requirement compliance for Finance and Administration staff and Animal Services Officers, who handle domestic animal control issues, including picking up strays, investigating bite incidents, enforcing animal cruelty and neglect ordinances, were not reviewed.

FINDINGS AND RECOMMENDATIONS

OAS implemented a comprehensive donation policy in June 2026, after the initiation of this review. As the policy was only recently adopted, we were unable to assess OAS's compliance. Notably, the policy requires OAS to publish an annual report that details all donations received and provide a comprehensive summary of how funds were expended. We learned that the policy does not include a process that permits employees to request that donated funds be used for a particular matter. As frontline staff often have a unique insight into daily operations and needs, we believe OAS should consider implementing a formal process that allows employees to request that donated funds be designated for a specific purpose.

We found that OAS staff appear to follow the written procedures for receiving monetary donations at ASAC and that such procedures comply with applicable County policies. Although OAS does not track in-kind donations, we learned that County policy only requires that in-kind donations be tracked if the value of the item(s) is $10,000 or more or has an estimated lifespan of more than one year. OAS staff told us they do not recall receiving any in-kind donations that met this criterion. We believe it would be prudent for OAS to require tracking of in-kind donations that exceed a lower dollar threshold (e.g., individual items valued at $100 or more).

ASAC recently streamlined its volunteer onboarding by creating a user-friendly online process which includes automated training modules. Additionally, ASAC removed previously perceived barriers to volunteering by eliminating required housekeeping shifts and lowering the monthly time commitment. As a result, the number of active volunteers has grown from only a handful of dog walkers in 2021 to nearly 500 volunteers, including 200–250 dog walkers.

OAS tracks all completed volunteer trainings electronically through its volunteer management software. All 21 volunteers whose training records we reviewed completed the training required for their specific roles.

Although training requirements for employees vary depending on position and/or OAS division, all staff who handle animals are required to complete a Fear Free[6] online course. We found that 26 of the 28 employees had documentation showing they met this requirement. We also found that some divisions lacked written training requirements, did not consistently maintain training records, or had incomplete records.

[6] The Fear Free Shelter Program is a free online training designed for all shelter and rescue personnel. It aims to reduce fear, anxiety, stress, and frustration in shelter animals through evidence-based handling and communication techniques. The program includes four required modules, each ending with an exam.

Finding: OAS could not provide evidence that all required training was completed for all applicable personnel.

Across the organization, training requirements vary considerably between divisions, particularly in courses required, documentation of completion, and retention of records. Several positions hold state-mandated licensing requirements, while others rely on internal training processes—some formalized, others longstanding but undocumented.

The Veterinary Services Division includes licensed Veterinarians and Registered Veterinary Technicians, all of whom must maintain active state licenses and complete required continuing education for renewal. In contrast, the division's four Veterinary Assistants are not subject to state licensure, and their training process is informal. For the past decade, new assistants have been required to complete a one-month shadowing period with an experienced staff member, overseen closely by the Chief Veterinarian. Although this is a long-standing practice, this informal training does not have written requirements, expectations, or required documentation of completion.

Apart from Pet Placement Services employees, the Community Outreach Division does not have written training requirements but advised that staff are required to complete the Fear Free Shelter Course. OAS was able to provide certificates of completion for two of these three division employees.

Training expectations within Pet Placement Services are partially documented. Adoption Counselors are required to complete a written training checklist; however, records of these completed checklists were not retained. The Foster Coordinator position does not have any written training requirements.

In 2024, the Shelter Services Division implemented formal written training requirements to include a completion checklist covering multiple subject areas and responsibilities. Of the 16 employees in the division, these 2024 requirements applied to six that were hired after the date of implementation. We determined that five of these six employees had the training checklist in their files and none were fully completed. Additionally, Maryland regulations require shelters to maintain written records demonstrating that relevant staff have been trained in sanitation protocols. Four of the sixteen Shelter Services Division staff lacked documentation confirming completion of this required training

Recommendation:

We recommend that OAS implement formal written policies mandating that all training requirements are documented and that records of completed training are retained.

OIG Comments to Chief Administrative Officer's Response

The County Chief Administrative Officer's response to our report is included in its entirety in Appendix A. The response indicates concurrence with the OIG's recommendation.

The OIG categorizes progress towards implementation into the following four statuses:

- Open Unresolved: No management response, inadequate response, or no agreement on corrective action plan.

- Open In Progress: Agreed on planned action, auditee is in the process of implementing stated actions, but no evidence of implementation has yet been provided to the OIG.

- Open Resolved: Auditee provided support to OIG indicating implementation was complete, OIG testing to ensure implementation.

- Closed: Recommendation has been implemented.

The following represents the status of the recommendation made in this report. The OIG will continue to monitor progress every ninety days towards implementing the County's actions to address the recommendation.

Recommendation Status:

1. Open Unresolved

APPENDIX A: CHIEF ADMINISTRATIVE OFFICER'S (CAO) RESPONSE

The Chief Administrative Officer provided the following response to our report:

OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

Richard S. Madaleno
Chief Administrative Officer

MEMORANDUM

November 4, 2026

TO: Megan Davey Limarzi, Inspector General

FROM: Richard S. Madaleno, Chief Administrative Officer

SUBJECT: Inspector General Confidential Draft Report: Response and Action Plan – Review of the Office of Animal Services (OIG Publication #27-6)

Thank you for the opportunity to respond to the issues identified in the report. The Animal Services and Adoption Center operated by the Office of Animal Services (OAS) is the County's only open-admissions municipal shelter and provides essential care, veterinary treatment, enrichment, and placement services for vulnerable animals. We appreciate the OIG's review and share its commitment to strong operational controls that support animal welfare and public trust.

We acknowledge opportunities to strengthen OAS's written training requirements, documentation practices, and record-retention controls. We agree that uniform requirements and reliable records are necessary to demonstrate compliance and are taking appropriate steps as noted below.

Recommendation: We recommend that OAS implement formal written policies mandating that all training requirements are documented and that records of completed training are retained.

Response. We concur with this recommendation. OAS will implement a written, role-based training policy and matrix for applicable employees and volunteers who handle animals. The policy will establish required training; applicable licensing, continuing education, and regulatory requirements; onboarding and checklist documentation; supervisory responsibilities; and record-retention requirements. By December 31, 2026, OAS will issue the policy, matrix, and standardized documentation requirements. By March 31, 2027, OAS will establish a centralized electronic training-record repository and standardized individual checklists; reconcile current records; and obtain evidence or require completion or re-completion of training, as appropriate, when evidence cannot be located. Beginning April 1, 2027, division supervisors will verify completion before closing required training items and conduct quarterly compliance reviews.

101 Monroe Street • Rockville, Maryland 20850
240-777-2550 • MD Relay 711 TTY • 240-777-2517 FAX
www.montgomerycountymd.gov

OAS management will review exceptions and corrective actions. The target date for full implementation is June 30, 2027.

Thank you for bringing these matters to our attention.

cc: Fariba Kassiri, Deputy Chief Administrative Officer, Office of the County Executive
Caroline Hairfield, Director, Office of Animal Services
Michele El-Gamil, Internal Audit Manager, Office of the County Executive

APPENDIX B: RECOMMENDATION STATUS AND FOLLOW UP

This Appendix provides a summary of the findings and recommendations presented in this report along with the OIG's assessment of the county's progress towards addressing the recommendations. The OIG categorizes progress towards implementation into the following 4 status groups:

- Open Unresolved: No management response, inadequate response, or no agreement on corrective action plan.
- Open In Progress: Agreed on planned action, auditee is in the process of implementing stated actions, but no evidence of implementation has yet been provided to the OIG.
- Open Resolved: Auditee provided support to OIG indicating implementation was complete, OIG testing to ensure implementation.
- Closed: Recommendation has been implemented.

Finding #	Finding	Recommendation	CAO Response	Status
1	OAS could not provide evidence that all required training had been completed for all applicable personnel.	We recommend that OAS implement formal written policies mandating that all training requirements are documented and that records of completed training are retained.	Concur. Full implementation date June 30, 2027.	Open Unresolved