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Summary

Purpose

The purpose of this review was to determine if the two proposals received by the City of Independence to manage the new animal shelter satisfied the City's obligations under the 2009 Intergovernmental Agreement with Jackson County. Moreover, the review sought to clarify the financial costs to the City in each proposal. Finally, the review benchmarked the levels of service in each proposal against national guidelines for shelter operations as well as the historical average of the current shelter. This report does not constitute a traditional performance review in that it does not seek to evaluate the quality or manner in which the shelter would operate, but rather is intended to provide an informative overview of the level of service each proposal would provide and if these levels would meet both the City's obligation and national guidelines. This report summarizes these findings.

Background

A March 2007 Feasibility Study that was commissioned through a cooperative agreement between the City of Independence and Jackson County found the City's current animal shelter to be "significantly undersized" for its intended purpose and further found it to be economical for the City and Jackson County to build a new, shared facility. In June 2009, the City and Jackson County entered into an Intergovernmental Agreement that required the County to issue special obligation bonds totaling \$5.3 million to fund the design, construction, and equipping of the new shelter. In return, the City was required to operate the shelter as well as assume any ongoing maintenance. Additionally, both field services and animal shelter services were to be provided to unincorporated Jackson County and Jackson

County parks at no cost. This agreement required the City to operate the shelter for a minimum 35 public hours each week. The shelter must be open six days per week, Monday-Saturday. Animals being provided to the County must be sheltered a minimum of six days. While the City's Health Department provided a proposal for continuing management of the shelter, an RFP was prepared to solicit proposals from private entities for management services. One respondent, Heartland SPCA, provided a proposal. Since their original proposal was submitted in January 2012, negotiations with the City have led to three revised proposals.

Findings in Brief

Upon review of both the Health Department and Heartland SPCA proposals, the following findings were made:

- Both proposals exceed the minimum 35 hours and six days per week that the Intergovernmental Agreement requires. The Health Department proposes operating 49 hours per week and six days per week. Heartland SPCA proposes operating 70 hours per week and seven days per week.
- The Health Department projects an annual animal intake of 5,000 animals. Heartland SPCA projects an annual animal intake of 4,200. Both of these estimates are below the National Animal Control Association's projected figures for a comparable human population. However, the five-year average intake of the current animal shelter is also below the NACA estimate. The Health Department proposal is closer to the five-year intake average for the current animal shelter.

- The Health Department projects higher annual revenues than Heartland SPCA. Both proposals exceed the five-year average revenues collected at the current animal shelter. Heartland SPCA proposes sharing some revenues with the City in the first contract year, but not thereafter.
- The Health Department proposes lower net non-revenue supported costs than does Heartland SPCA. This cost could increase in future years under the Heartland SPCA proposal if revenues are no longer shared with the City. The Heartland SPCA proposal also increases the City's financial obligation by limiting expenditures for utilities.
- Both proposals meet the national average for cost per animal, with the Heartland SPCA proposal exceeding this average. The Health Department proposes a cost per animal of \$182, while Heartland SPCA proposes \$325. The national guideline outlined in the feasibility study called for a cost per animal of \$150-\$250.
- The Heartland SPCA proposal exceeds national guidelines specific to kennel staffing only. The Health Department proposal falls below these guidelines. The Health Department proposes a kennel staff of 1.5 FTE and overall staff of 8.9 FTE. Heartland SPCA proposes a kennel staff of 9.5 FTE and an overall staff of 22 FTE. The National Animal

Control Association, using a formula prepared by the Humane Society of the United States, projects a kennel staff need of 8.8 FTE for a comparable human population, excluding contract services and volunteers. The Health Department proposes to contract for kennel cleaning services, and both proposals anticipate engaging volunteer services.

- The national guideline for animal to staff ratio of 300:1 to 600:1 is met by the Health Department (562:1) and exceeded by Heartland SPCA (191:1). This ratio was developed in the 2007 Feasibility Study.

Conclusion

Both proposals allow the City of Independence to fulfill its shelter management obligations under the terms of the Intergovernmental agreement with Jackson County.

The Heartland SPCA exceeds national guidelines for kennel staffing while the Health Department falls below this mark. These guidelines are for paid staff only and do not take in to account volunteers or private contractors. However, both proposals achieve the desired animal to staff ratio.

The Health Department proposal anticipates higher revenue collections and thus lower net non-revenue supported costs of operating the shelter.

Background

Feasibility Study Findings

A March 2007 feasibility study found the present Independence animal shelter “not very well designed for its purpose” and recommended that the City of Independence and Jackson County engage in a joint venture to construct a new, larger facility. This study was received from “Shelter Planners of America” and conducted as part of a cooperative agreement with Jackson County. The study also provided details regarding site selection, design concepts, animal capacity, facility staffing, and operating budget. Additional considerations were provided regarding adoption and pet return issues, as well as euthanasia reduction strategies.

Intergovernmental Agreement with Jackson County

Following the review and consideration of this feasibility study, the City Council passed Ordinance No. 17332 in June 2009, authorizing the City to enter in to an intergovernmental agreement with Jackson County. Under the terms of this agreement, the City agreed to lease approximately 6.9 acres to the County for \$1.00. The County agreed to issue special obligation bonds during calendar year 2009 to fund the design, construction, and equipping of an animal shelter. The total cost to the County would not exceed \$5.3 million in bond proceeds (\$5.5 million inclusive of bond issuance costs). In return, the agreement held that the City was to administer and operate the animal shelter, as well as provide maintenance to the facility and facility grounds.

As part of the agreement, the City is tasked with providing animal control and shelter services within the City of Independence as well as “animal control services” and “sheltering services for the unincorporated areas of Jackson County and Jackson County parks”. The agreement stipulates the availability for which the City is to provide designated field services, patrol and enforcement services, and other requests for services to unincorporated Jackson County. Moreover, the agreement states that the City shall provide these services to the County at no cost during the term of bond repayment (maximum 30 years).

In terms of shelter operations, the agreement specifies that the shelter is to be open to the public a minimum of 35 hours per week, six days per week, Monday through Saturday. The City is to provide shelter space for a minimum of 6 days to small animals provided by the County and is to work toward a goal of being a “non-kill” shelter. All adoption fees, boarding fees, and other applicable fees collected at the shelter are to be retained by the City.

Finally, this agreement holds that the City is to offer animal control field services and sheltering to cities that, at the time the agreement was executed, had an agreement for similar services with Jackson County. These cities include Buckner, Greenwood, Levasy, Lone Jack, Sibley, and Unity Village. These cities would not be required to enter into an agreement with the City of Independence, but any revenue generated from these jurisdictions would be retained by the City of Independence. The table below provides a summary of key provisions found within the inter-governmental agreement.

Exhibit 1: Summary of Intergovernmental Agreement

Summary: Intergovernmental Agreement between the City of Independence & Jackson County for Construction & Operation of Animal Shelter Facility		
Activity	Jackson County	City of Independence
Land Acquisition	Lease 6.9 acres from City for life of agreement	
Financing of Design, Construction, and Equipping of Shelter	Max. \$5.3 million	
Facility Maintenance*		Includes grounds, routine maintenance, and replacement of all Facility components
Animal Control Field Services: Unincorporated Area*		Includes field services/patrolling, on-call services for unincorporated Jackson County and Jackson County Parks
Subagreements with Political Subdivisions		Must offer field services and sheltering at commercially reasonable fee to cities with current Jackson County agreements
Animal Control Field Services: Availability*		Routine Service 8:00 a.m.-5:00 p.m. Monday-Friday; Emergency On-Call Service 24 hr/7 day
Patrol & Enforcement Services*		To be provided in unincorporated areas of the County equivalent to one full-time Animal Control Officer during regular hours
Requests for Service*		All County animal control inquiries and requests for animal control services in unincorporated Jackson County
Hoofed Animal Control*		City to provide same-day pickup & board for stray hoofed animals as well as emergency calls and emergency veterinary care
Shelter Operation: Public Access*		Open to public six days per week, Monday-Saturday (Minimum 35 hours)
Shelter Operation: Services Provided*		Care for small animals being provided to the County for minimum six days, including food, shelter, and veterinary care
Shelter Operations: Fees Collected		All adoption, boarding, and applicable fees to be retained by the City
*Denotes services provided at no cost to the County during term of bond repayment (max 30 yrs)		

Request for Proposal for Animal Shelter Management Services

Following the execution of the inter-governmental agreement, the City prepared and issued a Request for Proposal (RFP) under the direction the City’s Purchasing Division and in accordance with the City’s Purchasing Manual. The RFP was issued on December 18th, 2011 with a response deadline and time of January 18th, 2012 at 2:00 p.m. The contract awarded would be for a period of one year with four, one-

year renewals. A number of submission requirements were outlined in the RFP, and the proposals were to be evaluated using a variety of criteria such as experience, cost, and implementation strategy. Finally, the RFP proposed various responsibilities for the City and the Contractor, which is summarized below. It should be noted, however, that because this was an RFP process and not a formal invitation to bid, these terms were non-binding and subject to negotiation.

Exhibit 2: Summary of Request for Proposal Terms and Conditions

Summary of Animal Shelter and Administration Responsibilities		
Scope of Service	City	Contractor
Animal Care		Provide all medical care, housing, and food to animals in shelter, including various intake and release services
Adoptions		Provide outreach to find secure homes for all healthy and treatable animals
Euthanasia		Provide humane euthanasia (as necessary)
Facility Maintenance	Provide existing equipment, maintain shelter access (i.e., snow and ice removal), maintain/clean Animal Services offices at shelter	Responsible for all improvements and repairs to shelter, daily maintenance of shelter and grounds, and maintenance of surgical room and misc. equipment
Utilities		Responsible for all utilities, including incinerator
Emergency Planning	Provide leadership in emergency planning	Provide procedures for shelter evacuation in event of disaster as well as emergency sheltering services, if needed
Staffing	Provide all Animal Services staff for City and City Contracts	Must provide adequate staff to operate the facility; responsible for volunteers
Security	Provide building entrance card scanners	
Administration	Provide Petpoint software	
Communication	Meet on Quarterly basis	Meet on Quarterly basis
Record Keeping		Maintain records indicating kinds and number of creatures in custody, location found, reason for confinement, and final disposition
Financial Reports		Maintain complete financial records

Upon reaching the deadline to submit an RFP, the City had received only one proposal, provided by Heartland SPCA. The RFP Evaluation Committee met once to review the proposal but did not make a recommendation. Since that time, the City has worked with representatives of Heartland SPCA to

negotiate the proposed cost. Additionally, the City has developed a proposed cost of operating the facility. The proposed Fiscal Year 2012-13 Budget currently assumes management of the shelter by the City.

Scope and Methodology

In response to the City Council's directive to review the two proposals to manage the new animal shelter, the City Management Analyst has developed a scope focusing on the following questions:

1. Does each proposal satisfy the requirements outlined in the Intergovernmental Agreement with Jackson County?
2. What is the estimated annual animal intake in each proposal?
3. What is the estimated annual revenue to be collected in each proposal?
4. What are the total operating expenses in each proposal? What are the net non-revenue supported costs in each proposal? What are the financial obligations to the City of Independence in each proposal?
5. What are the staffing levels in each proposal?
6. How do these proposals compare when benchmarked against national industry standards as well as historical averages for the present animal shelter?

To address these questions, the City Management Analyst has compared each proposal to see how they respond to the questions above. The Intergovernmental Agreement with Jackson County provides the City's requirements for managing the new shelter. National benchmark data was developed to evaluate each proposal using the guidelines provided in the feasibility study as well as guidelines provide by the National Animal Control Association. Finally, historical comparisons to the current animal shelter were developed by compiling data for Fiscal Year 2007-2008 through Fiscal Year 2011-2012. To gain a more thorough understanding of each proposal, the City Management Analyst interviewed Courtney Thomas, CEO of Heartland SPCA, Larry Jones, Director of the Independence Health Department, Robert Heacock, City Manager of Independence, and John Mays, Executive Director of the National Animal Control Association.

Findings

Both proposals satisfy the requirements outlined in the Intergovernmental Agreement.

Both the Health Department and Heartland SPCA proposals exceed the Intergovernmental Agreement requirement to operate a minimum six days per week with 35 public hours, Monday through Saturday. Additionally, each proposal provides care for animals being provided to the County for a minimum of six days. Both proposals also exceed the operating hours of the current animal shelter. The table below compares the proposals to the minimum intergovernmental agreement requirements and current animal shelter.¹

¹ Public Hours refers to the time period when the shelter is open to the general public for a variety of services. Actual adoption hours vary by day.

Exhibit 3: Comparison of Proposed Shelter Operating Days and Hours

Comparison of Proposed Shelter Operating Days and Hours			
Agency	Public Hours Open	Days Open	Days Boarded
Intergovernmental Agreement	35 hrs. (min)	6 days (min)	6 days (Min.)
Current Independence Shelter	35 hrs.	5 days	N/A
Health Department Proposal	49 hrs.	6 days	Will Meet
Heartland SPCA Proposal	70 hrs.	7 days	Will Meet

Both proposals estimate animal intake below NACA guidelines, with the Health Department proposal trending closer to the existing shelter's five-year average.

Both the Health Department and Heartland SPCA estimate annual animal intake below guidelines provided by the National Animal Control Association (NACA). NACA, using a formula developed by the Humane Society of the United States, calculates the incoming animal population per year to be seven percent of the human population. Using 2010 U.S. Census Bureau estimates, the population to be served by the new animal shelter is assumed to be 138,135.² However, the five-year average for the current animal shelter has typically been lower than the NACA estimate.³ The Health Department estimated the annual animal intake to be approximately 1,000 animals more than was served in calendar year 2011 and closer to the five-year average of the existing shelter. Heartland SPCA's estimate is approximately 15% below the five-year average. Their estimate is based on the 2011 shelter intake of approximately 4,000 animals plus an additional 200 animals from unincorporated Jackson County.⁴ While unincorporated Jackson County represents a nearly 1/5th population increase to the present service area, neither proposal assumes a corresponding 1/5th increase in service demand from that population.

Exhibit 4: Estimated Annual Animal Intake

Estimated Annual Animal Intake	
Agency	Annual Animal Intake
NACA Assumption*	9,669
Current Independence Shelter**	4,931
Health Department	5,000
Heartland SPCA	4,200
*NACA estimates the incoming animal population to be 7% of the human population per year	
**Five-Year Average	

² The new animal shelter will serve both the City of Independence, as well as unincorporated Jackson County. The 2010 Census provides a population for Independence of 116,830 and a population for unincorporated Jackson County of 21,305.

³ Five-Year Average based on actual intakes from Fiscal Year 2007-08 through Fiscal Year 2010-11 as well as budgeted intakes Fiscal Year 2011-12.

⁴ According to Courtney Thomas, CEO of Heartland SPCA, Wayside Waifs had an intake of 174 animals from unincorporated Jackson County in 2011.

The Health Department projects higher net revenues than Heartland SPCA. Both estimates exceed the current animal shelter five-year average revenue. Heartland SPCA proposes sharing some revenues with the City in the first year of the contract, but not in subsequent years.

The Health Department projects revenue totaling \$603,000 while Heartland SPCA projects net non-City contract revenue of \$407,193. When revenue from the management contract with the City is included, Heartland SPCA projects revenues of \$1,365,228.43. The Health Department assumes a live release rate of 90%, or 4,500 total animals. Heartland SPCA assumes a live release rate of 92%, or 3,780 animals. Revenues consist of impounding charges for various animals, feeding and care during each day of impoundment, and adoption fees.⁵ Additionally, revenues are collected for micro-chipping of animals. Revenues will also be generated from merchandise sales at the shelter. In the first year of the Heartland SPCA proposal, the City would retain \$107,000 in adoption fee revenues and Heartland SPCA would retain all revenues in excess of that amount.⁶ All revenues would be retained by Heartland SPCA in subsequent years. Moreover, Heartland SPCA proposes remitting all shelter intake revenue to the City in the first year of the contract, a projected \$19,094, though this would be subject to further negotiation for future years. Both the Health Department and Heartland SPCA revenue estimates exceed the five-year average for the current animal shelter, as illustrated in the table below.

Exhibit 5: Animal Shelter Estimated Revenue

Animal Shelter Revenue Overview	
Source	Total Revenue
Current Independence Shelter*	\$ 122,899
Health Department	\$ 603,000
Heartland SPCA (Non-City)	\$ 407,193
*Five-Year Average	

The Health Department proposes an operating budget of \$910,035 while Heartland SPCA proposes a base contract management fee of \$958,035, with potential additional expenses to the City. The Heartland SPCA will also increase the City’s net obligation in future years if revenues are no longer shared.

The Health Department proposes an operating budget of \$910,035. The Heartland SPCA proposal seeks a base contract amount of \$958,035, with an overall budget of \$1,363,235. This fee limits utility expenses to \$45,000 with additional costs to be assumed by the City. The City’s three utilities expect expenses to total \$96,905. This represents a potential additional obligation of \$51,905. If realized, the difference in cost between the Health Department proposal and Heartland SPCA could equal \$119,614.

⁵ Animal shelter charges were authorized by Ordinance No. 12053 in July 1992 and revised by Ordinance No. 17516 in March 2010. Animal ID fees are governed by administrative policy.

⁶ The proposal to allow the City to retain \$107,000 in the first year of the contract was based upon the City’s actual Animal Shelter fee collections in Fiscal Year 2009-2010, in which \$107,220 was generated.

Exhibit 6: Comparison of Animal Shelter Services Expenditures

	Health Department	HSPCA (5/2/2012)	Comments
Personnel Services			
Salaries-Regular Employees	\$ 468,698	\$ 768,199	City: 8.9 FTE/HSPCA: 22 FTE
Sub-Total Personnel Services	\$ 468,698	\$ 768,199	
Other Services & Charges			
Mailing & Shipping	\$ 300	\$ 3,000	
Fees & Permits	\$ 50	\$ 1,850	State of Missouri License*
Maintenance-Buildings & Other	\$ 4,398	\$ 16,000	
Dues & Memberships	\$ 200	\$ 500	
Training & Education	\$ 2,600	\$ 3,800	
Shelter Cleaning Services	\$ 97,200	\$ 82,200	City: outsource; HSPA: in-house
Veterinary Services	\$ 9,000	\$ 62,336	City: on-call veterinarian; HSPCA: on-call veterinarian & outsourced laundry service
Electricity/Gas/Sewer	\$ 96,905	\$ 45,000	City: calculated by City Departments. HSPA: \$45,000 cap & City pays balance
Pest Control	\$ 480	\$ -	
Foster Program	\$ -	\$ 15,000	
Human Resources/Payroll	\$ -	\$ 12,000	
Legal Services	\$ -	\$ 3,500	
Accounting/Auditing	\$ -	\$ 4,000	
Employee Recruitment	\$ -	\$ 850	
Other Employee-Related Expenses	\$ -	\$ 14,900	
Sub-Total Other Services & Charges	\$ 211,133	\$ 264,936	
Supplies			
Office Supplies	\$ 2,000	\$ 9,800	
Office Maintenance & Equipment	\$ -	\$ 2,500	
Veterinary Supplies & Micro-Chips	\$ 136,899	\$ 195,000	
Animal Food & Supplies	\$ 41,796	\$ 62,000	HSPCA: \$10,000 expense for cat litter
Merchandise for Resale	\$ 50,000	\$ 52,500	
Volunteer-Related Expenses	\$ -	\$ 5,000	Volunteer ID's, Recognition Event
Software	\$ -	\$ 3,300	Volunteer Management Software
Sub-Total Supplies	\$ 230,695	\$ 330,100	
Total Animal Shelter Services	\$ 910,526	\$ 1,363,235	
Base Management Fee	\$ 910,526	\$ 958,035	
*Missouri Department of Agriculture indicates that an animal shelter managed by a political subdivision is not subject to an annual licensing fee. If a shelter is operated privately pursuant to an agreement with a political subdivision, there is a base fee of \$125 and a per capita fee of \$1.00 up to \$2,500 annually.			

As was previously discussed, Heartland SPCA proposes providing revenues to the City in year one of the contract. With potential additional costs to the City of \$51,905 and revenues remitted to the City of \$126,094 in year one of the contract, the net City obligation is projected to be \$883,846. If revenues are not shared with the City in subsequent years, this amount rises to \$1,009,940. The Health Department, in turn, proposes net non-revenue supported costs of \$307,526. The table below summarizes the net contract obligations in year one and subsequent renewal years.

Exhibit 7: Comparison of Net City Expenses

Comparison of Net City Expenses*				
Proposal (Year)	Base Management Fee	Additional City Expenses	City Retained Revenue	Net City Expenses
Heartland SPCA (Year One)	\$ 958,035	\$ 51,905	\$ 126,094	\$ 883,846
Heartland SPCA (Years 2-5)	\$ 958,035	\$ 51,905	\$ -	\$ 1,009,940
Health Department	\$ 910,526	\$ -	\$ 603,000	\$ 307,526
*Assumes contract conditions would remain constant, with no changes to expenses, revenues, or service levels.				

When proposed expenses are weighed against proposed revenues, Heartland SPCA proposes net non-revenue supported costs of \$956,042. If the City contract fee is included, Heartland SPCA indicates a slight profit of \$1,993 in the first year of the contract.

Both proposals meet the national average for cost per animal with the Heartland SPCA proposal exceeding this average.

Both the Health Department and Heartland SPCA proposals meet, at a minimum, the national average cost per animal of \$150 to \$250 as outlined in the March 2007 Feasibility Study. The Health Department proposes operating expenses of \$910,526. With 5,000 animals estimated to be taken in to the shelter, these equates to an average cost per animal of \$182. The Heartland SPCA proposal contains total operating expenses of \$1,363,235 and total animal intake of 4,200 with an average cost per animal of \$325. Both proposals exceed the current Independence animal shelter’s cost per animal of \$149.⁷

⁷Cost per animal for the current Independence animal shelter represents a five-year average based on actual intakes and expenditures from Fiscal Year 2007-08 through Fiscal Year 2010-11 as well as budgeted intakes and expenses Fiscal Year 2011-12. Additionally, this average includes field services operations as this function was previously budgeted with the shelter operations.

Exhibit 8: Average Cost Per Animal

Average Cost Per Animal	
Source	Cost Per Animal
Feasibility Study Recommendation*	\$150-\$250
Current Independence Shelter	\$ 149
Health Department	\$ 182
Heartland SPCA	\$ 325
*Figure provided in March 2007	

The Heartland SPCA proposal exceeds national kennel staffing guidelines for paid staff. The Health Department proposal falls below this guideline. Both proposals achieve national guidelines for shelter staffing needs.

The Heartland SPCA proposal provides for 9.5 FTE for kennel-only staff and 22 FTE overall. The Health Department proposal provides for 1.5 FTE kennel-only staff and an overall staff of 8.9 FTE. The National Animal Control Association (NACA), using a formula prepared by the Humane Society of the United States, calls for kennel-only staff 8.8 FTE per day to serve a population equivalent to that of Independence and unincorporated Jackson County (approximately 138,135 at the 2010 census). This figure does not include volunteer or contractor services. However, the Health Department proposal does anticipate contracting for kennel cleaning services. Moreover, both proposals seek to engage volunteer services as part of the management of the shelter.

Another consideration of staffing levels is the ratio of animals to staff. The Health Department proposal contains an animal to staff ratio of 562:1, while the Heartland SPCA proposal contains a ratio of 191:1. The feasibility study provided in March 2007 stated that the nationally accepted staffing level ratio is 300 animals to 1 staff person up to 600 animals to 1 staff person.

Conclusion

Both the Health Department and Heartland SPCA proposals to operate the new animal shelter allow the City of Independence to fulfill its obligations as outlined in the 2009 Intergovernmental Agreement with Jackson County. This agreement requires the City to provide shelter services to the public for 35 hours per week, six days a week, Monday through Saturday. The Health Department proposal operates 49 hours per week, six days a week, Monday through Saturday. The Heartland SPCA proposal operates the shelter 70 hours per week, seven days a week, Monday through Sunday. While both proposals project annual animal intake below estimates for a comparable human population as calculated by the National Animal Control Association, the Health Department proposal is closer to the five-year average intake at the current shelter. The Health Department proposal also estimates higher annual revenues, while both proposal estimate revenue above the five-year average of the current shelter. Heartland SPCA proposes sharing some revenues with the City in the first year of management, but does not presently propose this in subsequent years. The Health Department proposes net non-revenue supported costs that are lower than those of Heartland SPCA, and this difference would grow in subsequent years if revenues did not

continue to be shared with the City. This figure could also increase if utility expenses were capped, as the Heartland SPCA currently holds. Both proposals exceed the national average cost per animal guideline of \$150-250 per animal as identified in the 2007 Feasibility Study. Finally, the Heartland SPCA proposal exceeds the national guideline for kennel-only staff while the Health Department proposal falls below this mark. This guideline does not include contractor services, which the Health Department plans to utilize. This guideline also does not include volunteers, which both proposals seek to engage. The national guideline for an animal to staff ratio of 300:1 up to 600:1 is met by the Health Department (562:1) and exceeded by Heartland SPCA (191:1).