

REPORT

of the

TOPEKA ZOOLOGICAL PARK

in response to the

SPECIAL INSPECTION REPORT

of the

ASSOCIATION OF ZOOS AND AQUARIUMS

February 15, 2010

I. 2007 Accreditation Concerns not yet addressed

A. A formal education evaluation process was committed to in 2007 but has not been executed.

Topeka Zoo Response

In 2009, the Topeka Zoo, at the direction of the City Manager and in cooperation with the city's new Performance Management Coordinator, developed and adopted a strategic plan. This plan became effective in October 2009.

The Zoo strategic plan provides, in pertinent part, for continuing evaluation of our education plan including our goals, objectives, strategies, and action plans. Among the strategies established in our 2009-2011 Plan are to:

1. Diversify and expand the usage of Zoo programs and services;
2. Develop and maintain relations with Zoo stakeholders;
3. Develop and implement a three-year marketing plan; and
4. Establish an on-line registration system for Zoo education and related services.

Some of our action plans to implement these strategies include:

1. Enhancing and expanding the Zoo's on-site interpretation programs;
2. Developing comprehensive educational services for schools;
3. Expanding alliances with other youth-oriented institutions including our new Children's Discovery Center, and
4. Developing and implementing outreach methods for program expansion.

We have recently established a formal education program evaluation system and process to ensure that we have clearly defined expectations for existing and future programming against which our performance in the implementation of various activities can be tracked and measured against our target results.

Our formal education evaluation system and process methodology is based on the Logic Model approach in which baseline data is developed, in which education program goals, inputs/resources, projected activities, and projected targets are established, and in which the success of action steps are measured against target program outputs, effectiveness and timeliness expectations, and anticipated program outcomes.

We have recently initiated processes by which we link our baseline data including participant enrollment and program income with those goals, inputs/resources, projected activities, and targets. We will then track the impact of action plan implementation on a monthly basis and conduct a quarterly educational program review.

Among the tools we are utilizing in evaluating our education programs are those designed to measure program outputs, effectiveness, and outcomes including:

1. Program participant and program income data collection and analysis reports. These reports will enable measurement of improvement against baseline program participant and income data and program output targets.
2. Program work systems and processes data collection and analysis reports. These reports will enable measurement of improvement against baseline program system and process results and program effectiveness targets.
3. Program outcomes data collection and analysis reports. These reports will enable measurement of improvement against baseline opinion survey data and program satisfaction targets of various segments of our stakeholders or potential stakeholders including current participants, parents, instructors, support staff, and citizens.

Staff that was responsible for re-establishing the education evaluation system between 2007 and the present have only recently left their positions. The evaluation system protocol has only just been developed and adopted following the departure of those staff.

With the evaluation system's recent adoption, there has not been sufficient time to fully implement and utilize the complete range of evaluation tools nor to fully apply them with respect to all programs. However, we have utilized this new evaluation system and process with respect to one educational program, our Fun Club (on-site pre-school program), in early February, and plan to do so with respect to our Discovery Program (approved Kansas State Science Education Standards home school program) in late February.

For example, the goals of the Fun Club are to:

- Provide an interactive educational program for preschool children designed to foster awareness and knowledge of the animal world.

- Promote a learning environment for preschool children that will enhance the development of early childhood education skills including reading, art, and social development skills.

Following the Fun Club program, staff distributed a survey instrument to parents and to the instructor and recorded the oral responses of the pre-school participants to pre-set questions. Our plan is to track this information for this and all other education programs on a monthly basis and engage in a quarterly review in which the data will be compared against baseline data and program targets.

Examples of the logic model and survey instruments for each of these programs are attached as Exhibit #1 in the Appendix.

We expect to receive approval for the re-constituted Education Specialist II (Director of Education) position in late February and commence immediate recruitment for this position. One preferred qualification for this position will be an understanding of and experience in program evaluation. We anticipate filling the position on or before April 15.

Action Plan:

1. Logic Model methodology for program evaluation has been adopted and is being utilized.
2. A sample template has been developed encompassing the following:
 - a. Program Goals
 - b. Target Outcomes
 - c. Steps to Achieve the Outcome
 - d. Results Analysis and Action Plan
 - e. Person(s) Responsible
 - f. Time Frame
3. Logic Model methodology has been developed and data collected for one program in February 2010. The model shall be utilized in a second program later in February 2010.
4. A Logic Model shall be adopted and utilized in setting standards and evaluating all education programs on or before May, 2010.
5. Education and Community Relations program staff shall collect data daily, track and report the data monthly, and analyze the data quarterly beginning in May 2010.
6. Quarterly program reviews shall be conducted with the Education and Community Relations program staff and the Topeka Zoo management beginning in August 2010.

- B. A major concern in the 2007 inspection was the provision of behavioral welfare for primates. While fire hose hammocks were installed, climbing structures and resting platforms have not been installed as described below and are two years beyond the written commitment made to the accreditation Commission.**

Topeka Zoo Response

This concern came as news to staff at the Topeka Zoo. Current Zoo staff have advised the Interim Director that they were told by management previously employed by the Topeka Zoo that hammocks were considered sufficiently responsive to this concern.

Since the receipt of the Special Inspection Report and recognizing the urgency and importance of this concern, Topeka Zoo staff have already taken actions to:

1. Design the climbing structures for the gorilla holding units.
2. Construct the climbing structures for the gorillas.
3. Plan for installation of the climbing structures when the gorillas are not within the indoor unit.

Please note:

As we understand AZA guidelines, the gorillas are not to be outdoors when a combination of the air temperature and the wind chill factor make the temperature feel like 40 degrees F. or lower on a consistent basis.

In this case one of the gorillas, a 41 year old female named Tiffany, suffers from a spinal condition that, as we understand AZA guidelines, adds another 5 degrees to the consistent temperature level in which exposure to the outdoors is proscribed.

Kansas weather is notoriously unpredictable but it is unlikely that these platforms will be able to be installed before the end of March. We are poised to commence installation and will do so immediately upon the weather consistently reaching 45 degrees. Our installation goal is April 15.

4. Design the orangutan platforms for holding units 2, 3, 4, and 6. (There will not be platforms in unit 1 as it is utilized as an immobilization and recovery unit. Removable hammocks are being utilized in unit 1. In

addition, there will not be a platform in unit 5 as it is utilized as the alley way for transfer from the holding unit to the outdoor unit.)

5. Order replacement poles for orangutan resting platforms and prepare to construct upon delivery.
6. Plan construction of platforms in orangutan holding units 2 and 6 when the outdoor air temperature is consistently at or above 40 degrees F.
7. Plan construction of platforms in units 3 and 4 six days after construction of the platforms in the first two units.
8. Establish a target construction completion date of on or before May 1, 2010.

Action Plan:

1. Continue construction of gorilla climbing structures.
2. Install gorilla climbing structures as soon as outside temperatures consistently feel like 45 degrees, including wind chill factor (permitting the gorillas to go outdoors and allowing workers to install the climbing structures and resting platforms.)
3. Install the three climbing structures in gorilla holding units 2, 3, and 4 on or before April 15, 2010. (The dimensions for the platforms are as follows:, 4'x 5', 2.5' x 5', and 4'x7').
4. Continue design of orangutan platforms and take delivery of the ordered replacement poles and supplies for the towers in the outdoor exhibit.
5. Repair towers in the yard.
6. Complete installation of gorilla climbing structures on or before April 15, 2010.
7. Complete installation of orangutan resting structures on or before May 1, 2010.

(Please see attached pictures sent under separate cover as well as the attached drawings and other description of the design and planned installation identified as Exhibit #2 in the Appendix.)

II. Animal health/husbandry/veterinary care

A. Veterinary Services

1. **On a temporary basis, part-time veterinary coverage appears to be sufficient. However, animal collection numbers and composition warrant a full-time veterinarian and veterinary technician.**

Topeka Zoo Response

The Topeka Zoo agrees with the observation that the animal collection numbers and composition warrant a full-time veterinarian and a full-time veterinary technician.

We are actively recruiting for a veterinarian including through the American Association of Zoo Veterinarians. The position is currently posted on the AAZV and City of Topeka websites. We have received at least one expression of interest to date.

We plan to re-establish the position of veterinary technician and recruit for this position. Prior to February 11 there was no authorized full-time equivalency position available nor was funding for a full-time veterinary technician position funded within the current budget. However, following the February 11 reorganization of the management structure, as more fully described below, a full-time equivalency position has become available. In addition savings generated from the abolished positions will permit the immediate filling of this position. We expect to advertise this position shortly.

Action Plan:

1. Veterinarian position recruitment is currently underway.
2. Recruitment of Veterinary Technician position is to commence on or before March 1, 2010.
3. Recruitment will continue until the Veterinarian and Veterinary Technician positions are filled.
4. Applications will be reviewed and candidates screened for interviews on a rolling basis.
5. Interviews will begin for both positions on or before March 29, 2010.
6. Offers of employment will be extended on or before April 5, 2010.
7. New Veterinarian and new Veterinary Technician will commence work at the Topeka Zoo on or before May 3, 2010.

II. Animal health/husbandry/veterinary care

A. Veterinary Services

2. **These animal health support facilities meet or exceed AZA standards and, with appropriate staffing, will enhance animal health services.**

Topeka Zoo Response

The Topeka Zoo agrees with the observation. See II.A.1. Action Plan above regarding anticipated action steps to effect appropriate staffing.

II. Animal health/husbandry/veterinary care

A. Veterinary Services

3. **Our team did not find specific examples of veterinary care that did not meet professional standards. There was evidence of the need for improved communication regarding identification of cases and communication between veterinary and management staff. It was also apparent from a review of the records as well as from staff interviews that mechanical issues with the water supply may have contributed to hyperthermia and death of the hippo in 2006. Previous official reports had denied this possibility.**

Topeka Zoo Response

The Topeka Zoo is pleased that the Special Inspection Team's findings, based on the cases they reviewed, did not include examples of veterinary care that did not meet professional standards. We are not pleased with the finding of a need to improve communication between veterinary and management staff. We are, however, compelled to agree with such finding.

Present Zoo management believes that a significant reason for communication problems in case identification and lack of care and timeliness in reporting of such problems was related to the multiplicity of staff involved.

It should be noted that neither the Zoo Director, the Director of Animal Collection (the senior manager responsible for animal care), nor the Veterinarian employed at the Topeka Zoo at the time of the hippo's death in 2006, are employed with the Topeka Zoo today.

We have abolished the position of Director of Animal Collection in the recent reorganization. The Animal Collection Director's sole direct report, the position of Animal Care Manager, has been merged with that of another abolished position, i.e., Operations Manager, thereby reducing organizational friction and/or isolation. As noted above, the Veterinarian position is expected to be filled with a new full-time hire on or before May 3, 2010. Similarly, the Zoo Director position is currently under recruitment, including posting on the web-site of the Association of Zoos and Aquariums (AZA). We expect to fill the Zoo Director position on or before May 3, 2010.

At that point one manager shall oversee the Animal Care and Facilities functions and one manager shall oversee the Veterinary Services functions. Both shall have clear, unambiguous authority for their assigned duties and responsibilities and shall be held accountable by, and shall report to, the Zoo Director. Serving as further assurance of clear, effective communication, there will be a Registrar, also reporting to the Zoo Director. This position will receive all written and electronic communication between these managers and will be responsible for ensuring that the Director is notified of communication breakdown and lack of follow through.

In addition, the Topeka Zoo, in conjunction with the City of Topeka's Performance Management Coordinator, is in the process of undertaking a thorough review and revision of its standard operating procedures. As the Performance Management Coordinator is on the City Manager's staff and is presently serving as the Interim Zoo Director, the City is confident that these protocols shall be implemented as described in the action plan set forth below.

Included in the planned Topeka Zoo SOP review and revision is the adoption of new animal care case management protocols that, when fully trained upon and implemented, shall improve communication between veterinary and management staff and ensure compliance with the protocols.

Compliance with this 2010 Accreditation Standard shall be assured through written and electronic documentation requirements as described in the Action Plan below as well as through the efforts of the staff that shall be named to perform the duties of the new singularly-focused position of Registrar. The position description, which is in the process of being drafted, shall be clearly accountable for ensuring compliance with the revised standard operating procedures.

This position has been proposed to the city Human Resources Department and the appropriate range within the City's civil service system is being assessed. When approved, it shall be filled through an in-house competitive selection. As proposed the position shall be a direct report of, and solely accountable to, the Zoo Director.

The Registrar shall be included on all communications between veterinary and management staff related to animal health issues. The Registrar shall be responsible for alerting the Director to lack of follow through by management and veterinary staff with respect to animal health issues. The Registrar shall also be the recorder at all Keeper meetings which are described below.

The position of Registrar shall help eliminate intimidation of staff for reporting animal welfare concerns, offer a cross-training opportunity for zookeeper staff to broaden their knowledge and understanding of zoo operations, and ensure a single point of accountability for institutional compliance with AZA communication and responsiveness standards on the part of veterinary and management staff.

Protocols shall also be developed to ensure that a mechanism is provided through which animal welfare issues can be reported with confidence that such concerns shall be addressed as required by AZA Accreditation Standards:

“The institution must develop a clear process for identifying, communicating, and addressing animal welfare concerns within the institution in a timely manner.” (2010 Accreditation Standards and Related Policies; 1.5.8).

This new process shall also help address the expressed concern regarding lack of management responsiveness to staff’s animal welfare concerns as described below and repeated under II. B. 5. below. The new process consists of the following:

1. There shall be a form created that shall be entitled “*Topeka Zoo Concern*” and shall consist of an original and a “no carbon” duplicate copy.
2. The form shall be available at one location, easily accessible to all staff, on the Topeka Zoo grounds.
3. Both the original and the duplicate copy of the form shall be sequentially numbered.
4. Staff shall be trained to utilize such form to:
 - a. Alert management to operational problems of which management may not be aware;
 - b. Make recommendations to management concerning special recognition for co-workers, and
 - c. Express concern to management about animal welfare concerns.

(Having the form available for multi-purpose reporting is intended to eliminate any latent staff concerns about being seen accessing such form and will hopefully make staff feel more inclined to use it.)

5. Staff shall also be trained that any staff member who takes a form, for whatever purpose, shall be required to return the original form, even if unused, to a locked box, accessible by only one staff member, the Registrar. Staff will also be trained to retain the duplicate copy for use if management fails to provide a timely response to the expressed concern. Such box shall be placed at a location on the Topeka Zoo grounds, easily accessible for staff, but inaccessible to the general public.
6. In order to ensure anonymity and also to prevent any concern from being intentionally disregarded by management, up to and

including the Zoo Director, the protocols shall establish, and staff shall be trained, that if there is not a demonstrable response to the expressed concern within 5 days of receipt by the Registrar, staff expressing the concern shall take their numbered duplicate copy to a designated staff member of the city Human Resources Department and a designated staff person in the City Attorney's office.

7. The protocol shall provide that such human resources and legal staff shall bring the matter to the attention of the City Manager and Deputy City Manager.

By establishing the position of Registrar, filling the position with a Zookeeper who will have clear and unambiguous responsibility for receiving any such concerns and reporting them to management, and establishing protocols that provide a fail-safe system through the human resources and legal departments to ensure awareness of concerns at the highest management level of the organization, we will ensure management accountability for responding to any and all animal health issues. In so doing, we expect to put such fears of retaliation to rest.

Finally, it should be noted that with the February 11 management reorganization and the filling of the Zoo Director, Veterinarian, and Veterinary Technician positions, the Topeka Zoo is poised to embark on a new era of collaboration, communication, and cooperation.

Action Plan:

1. Continue review and revision of communication protocols for veterinary and management staff begun with the appointment of an Animal Care Response Team in developing a response to this Special Inspection Report.
2. Complete development of the position of Registrar
3. Obtain approval of city Human Resources Department on or before March 1, 2010.
4. Establish internal application deadline for Registrar vacancy of March 15, 2010.
5. Conduct interviews with Topeka Zoo staff for Registrar position on or before March 29, 2010.
6. Adopt new communication protocols on or before April 19, 2010.
7. Train on the new communication protocols on or before April 26, 2010.
8. Implement the new protocols on or before April 30, 2010.

II. Animal health/husbandry/animal care

B. Animal management/husbandry

1. The Zoological Department management structure appears to be unbalanced for the demands of progressive collection management.

Topeka Zoo Response

The Topeka Zoo agrees with the observation that the Topeka Zoo management structure is unbalanced.

Accordingly, the Topeka Zoo has been reorganized, effective February 11, 2010. This is graphically displayed on the attached organization chart entitled “Topeka Zoo Department—February 11, 2010” which is Exhibit #3 in the Appendix along with the organization chart that was previously in effect.

In summary, the reorganization:

1. Reduces the number of the direct reports of the Zoo Director from 5 to 4;
2. Integrates the management of Animal Care and Facilities to improve communication and cooperation;
3. Reduces the number of direct reports of the Animal Care and Facilities Manager from 16 to 4;
4. Creates a middle management level in the integrated animal care and facilities division that provides a more reasonable span of control for the division manager as well as permits promotional opportunities for staff growth and development;
5. Establishes the position of Registrar (as noted above in II.A.3) to encourage cross-training, professional growth, and improve communication, and ensure timely response in complying with new protocols.
6. Re-establishes a full-time management position in the re-named Education and Community Relations Division (these responsibilities had been assumed by the previous Zoo Director on a part-time basis)
7. Integrates the education, community relations, admissions, and special events program functions and staff in a single division;
8. Clarifies clerical support for the education and community relations division and the animal care and facilities division;
9. Establishes the possibility of creating two part-time positions dedicated to volunteer coordination and community outreach if funding permits.
10. Permits the establishment of sufficient FTEs and funding to fill the new director of education position and a new veterinary technician position as well as the reclassification of one maintenance worker and one zookeeper as supervisors and one zookeeper as registrar.

Action Plan:

1. Reorganization became effective on February 11, 2010.
2. Registrar position shall be authorized on or before March 1, 2010.
3. The new Supervisor I reclassifications shall be authorized on or before April 1, 2010.
4. Recruitment for the new Education Specialist II (Director of Education) position will begin on or before March 1 and shall be filled on or before May 15, 2010.
5. The Zoo Director position shall be filled on or before May 3, 2010.
6. The full-time Veterinarian position shall be filled on or before May 3, 2010.
7. The full-time Veterinary Technician position shall be filled on or before May 3, 2010.

II. **Animal health/husbandry/veterinary care**

B. Animal management/husbandry

2. **Seemingly arbitrary discipline or transfers from one work unit to another over the years has created a mix of experience/knowledge levels in staff with the same classifications. This is not considered to be a best practice in either general personnel management or zoo management.**

Topeka Zoo Response

The Topeka Zoo agrees with the observation and is currently working with the City of Topeka Human Resources Department to craft clear and consistent expectations for staff and managers, develop, implement, and document regular training on those expectations, and develop, implement, and regularly evaluate the personal improvement plans of all staff.

We are confident that implementation of the foregoing clear, professional expectations and training and evaluation protocols, coupled with the hiring of a new Zoo Director, Veterinarian, and Education Director, arbitrary and inconsistent discipline shall be abolished and transfers shall be utilized for staff professional growth and development rather than as a means of avoiding management responsibility for directly addressing staff performance.

Action Plan:

1. Complete new Personal Improvement Plans for all staff, in cooperation with the Human Resources Department, on or before March 12, 2010.
2. Develop a staff training plan on or before April 15, 2010.

3. Implement first training module on or before May 3, 2010.

II Animal health/husbandry/animal care

B. Animal management/husbandry

- 3. The exhibit planning process does not appear to routinely engage keepers in the design of facilities that they ultimately have to use in day to day management of the collection. An end result has been a need for retroactive “fixes” (as in the new cougar exhibit’s lounging shelves). Progressive zoos use exhibit planning as a professional development opportunity for staff at all levels and recognize the need for all exhibit users to have input in the design.**

Topeka Zoo Response

The Topeka Zoo agrees with the observation that staff involvement in the exhibit design process has been sporadic with less than optimum results. The following standard operating procedure for exhibit design and development has been adopted by the Topeka Zoo and shall be adhered to with respect to all design of all exhibits from and after its effective adoption date of February 8, 2010:

1. The Topeka Zoo shall hold an all staff training session on exhibit design that will be conducted by consultants from the AZA Professional Development School prior to undertaking any new exhibit development.
2. The Topeka Zoo shall consult with a minimum of five (5) AZA accredited facilities to gather best practices for the species and its needs for safety, exhibit design, and its impact on visitor experience when considering and identifying new species for display at the zoo.
3. The Topeka Zoo shall follow the AZA husbandry guidelines for species.
4. The Topeka Zoo shall develop a detailed construction budget and provide it to all Topeka Zoo staff, the friends of the Zoo, and the City Director of Finance prior to proposing the capital improvement to the City Manager.
5. The Topeka Zoo, in partnership with a qualified architect, will conduct a charette to ensure the review of a conceptual plan for the project in advance of making a recommendation to the City Manager.

Action Plan:

1. The new standard operating procedure for involvement of staff in the exhibit design process was adopted and is effective as of February 8, 2010.

III. Animal health/husbandry/animal care

B. Animal management/husbandry

4. Aging infrastructure of exhibits continues to be ignored while new exhibits get fast tracked with mediocre quality. A capital maintenance plan should be in place as well as a master plan for capital development, recognizing that a mix of both is needed.

Topeka Zoo Response

The Topeka Zoo agrees with the observation that it needs to develop, adopt, and implement a capital maintenance plan and that maintenance of existing exhibits should be balanced with the development of new exhibits.

In cooperation with the Friends of the Zoo (FOTZ), the Topeka Zoo has begun the planning process for the development of a capital maintenance plan.

We have conceptualized a three phase plan to meet the Topeka Zoo's short and long term needs. We shall form a working committee composed of members of the FOTZ board of directors, the FOTZ Executive Director, the Zoo's project engineer from the city Public Works Department, the city's Forestry Division, and Zoo staff to identify projects, prioritize the projects identified, establish funding targets, identify funding sources, and consider the develop of a "Renew the Zoo" capital maintenance campaign as well as a long range endowment development campaign.

The City of Topeka is on a calendar year budget cycle. Though the 2010 budget is already established, the recent personnel changes may provide the opportunity to identify and take action on several small projects this fiscal year. In cooperation with FOTZ we have already tentatively identified a six-project draft Phase 1 of a capital maintenance plan that would require modest funding of \$39,245. Larger and more complex projects in a later Phase 2 and Phase 3 will require funding from the 2011 budget. Again, the recent personnel changes may permit reallocation of resources that, even with reduced overall city funding for 2011, may allow implementation for some Phase 2 projects, especially with the assistance of our important community support partner.

Action Plan:

1. Capital Maintenance Plan Committee formed on or before April 1, 2010.
2. Capital maintenance projects identified on or before May 1, 2010.
3. 2010-2011 Capital Maintenance Plan presented to the new Zoo Director with funding targets established on or before June 1, 2010.
4. City Manager proposed 2011 budget submitted on or about July 1, 2010.

II. Animal health/husbandry/veterinary care

B. Animal management/husbandry

5. **Many staff expressed concerns that while the Animal Supervisor passes on comments to other managers, the other managers do not consider these comments or take action on them. (2010 Accreditation Standards and Related Policies; 1.5.8.) “The institution must develop a clear process for identifying, communicating, and addressing animal welfare concerns within the institution in a timely manner.”**

Topeka Zoo Response

The Topeka Zoo agrees with the observation and, as noted above in our response to II. A. 3., the reorganization of the Topeka Zoo abolishes several managerial positions and creates the position of Registrar, directly reporting to the Director to ensure communication between management and veterinary staff concerning animal health issues, and regulatory compliance and reporting. It is also expected that the Registrar shall help eliminate any actual or perceived fear on the part of staff in reporting animal welfare issues through implementation of new protocols for reporting animal health issues that also eliminate the potential for management to ignore the reporting of any such issues. This concern shall be addressed through the following protocols (this protocol is also shown at II. A. 3. above):.

1. There shall be a form created that shall be entitled “*Topeka Zoo Concern*” and shall consist of an original and a “no carbon” copy.
2. Copies of the form shall be available at one location, easily accessible to all staff, on the Topeka Zoo grounds.
3. Both the original and the copy of the form shall be sequentially numbered.
4. Staff shall be trained to utilize such form to:
 - a. Alert management to operational problems of which management may not be aware;
 - b. Make recommendations to management concerning special recognition for co-workers, and
 - c. Express concern to management about animal welfare concerns.

(Having the form available for multi-purpose reporting is intended to eliminate any latent staff concerns about being seen accessing

such form and will hopefully make staff feel more inclined to use it.)

5. Staff shall also be trained that any staff member who takes a form, for whatever purpose, shall be required to return the original form, even if unused, to a locked box, accessible by only one staff member, the Registrar. Such box shall be placed at a location on the Topeka Zoo grounds, easily accessible for staff, but inaccessible to the general public.
6. In order to ensure anonymity, but also to prevent any concern from being intentionally disregarded by management, up to and including the Zoo Director, the protocols will establish, and staff shall be trained, that if there is not a demonstrable response to the expressed concern within 5 days of receipt by the Registrar, staff making the complaint shall take their numbered copy of such form to a designated staff member of the city Human Resources Department and a designated staff person in the City Attorney's office.
7. The protocol will provide that such human resources and legal staff shall bring the matter to the attention of the City Manager and Deputy City Manager.

By establishing the position of Registrar, filling the position with a Zookeeper who will have clear and unambiguous responsibility for receiving any such concerns and reporting them to management, and by establishing protocols that provide a fail-safe system through the human resources and legal departments to ensure awareness of concerns at the highest management level of the organization, we will ensure management accountability for responding to any and all animal health issues. In so doing, we expect to put such fears of retaliation to rest.

Action Plan

1. Continue review and revision of communication protocols for veterinary and management staff.
2. Complete development of the position of Registrar.
3. Obtain city Human Resources Department approval for creating the position of Registrar on or before March 1, 2010.
4. Establish internal application deadline for Registrar of March 15, 2010.
5. Conduct interviews with Topeka Zoo staff for Registrar position on or before March 29, 2010.
6. Interview zookeeper staff and fill Registrar position on or before March 12, 2010.
7. Formalize and adopt the protocols as described above on or before April 30, 2010.

IV. Safety and Security

- A. “An employee committee should be appointed to implement the risk management plan, identify areas of potential risk, and review previous incidents...” (2010 Accreditation Standards and Related Policies; 11.4 Risk Management).**

Topeka Zoo Response

The Topeka Zoo is committed to the safety and security of its animal collection, staff, and guests while at the same time regretfully concurring with the observation and acknowledging its failure to adequately and concretely document such commitment so as to provide sufficient, tangible evidence of its serious and ongoing commitment.

With the recent personnel changes previously described, staff that was responsible for the organization and management of the previous safety committee are no longer employed at the Topeka Zoo.

We have recently reconstituted the dormant safety committee as the Safety and Security Committee including the adoption of provisions for the composition of the members of the Committee, the terms of its members, the responsibilities of its members, its annual meeting schedule, and protocols for the development and retention of documents including emergency drills, escape drills, and Committee records.

The newly reconstituted Safety and Security Committee had its first 2010 meeting on January 28, 2010 and adopted the following provisions to ensure its active continuity for 2010 and beyond as follows:

1. An employee committee, the Safety and Security Committee has been appointed by the Interim Zoo Director with the following responsibilities:
 - a. Develop and/or revise the risk management plan.
 - b. Implement the risk management plan.
 - c. Identify areas of potential risk
 - d. Communicate the identified areas to the Zoo Director and the City Attorney’s office.
 - e. Review and identify lessons learned from all drills and exercises.
 - f. Debrief all incidents involving safety or security issues to determine whether corrective action should be taken to prevent future similar incidents and/or whether training or other preventive action should be undertaken.

2. The Committee shall be composed of at least one representative from each of the following: animal keepers, maintenance, guest services, management, Friends of the Zoo, and the Risk Manager of the City of Topeka.
3. The Committee membership shall not exceed twelve members.
4. All members shall serve one year during this first year of the Committee
5. Beginning in 2011, two members will rotate off the Committee and two new members will join. Those rotating off and those rotating on will represent the same constituent group.
6. Beginning in July 2011 and every six months thereafter, a similar rotation will occur with two members rotating off and two members rotating onto the Committee. (This will ensure an understanding that safety and security is everyone's responsibility).
7. Members will regularly rotate through responsibilities for agendas and minutes for each meeting according to a schedule. **(Please find the minutes from the January 28, 2010 meeting attached as Exhibit #4 in the Appendix.)**
8. Meetings will be held on the fourth Thursday of each month at 1:30 p.m. in the Gary Clarke Center.
9. The Committee shall designate a sub-committee of four of its members to plan and implement quarterly safety inspections utilizing the attached checklist.

Action Plan:

1. Continue implementation of the reconstituted and functioning Safety and Security Committee on an ongoing basis, as provided above.

B. Lack of drills, drill documentation, records, and training

“Emergency drills should be conducted at least once annually for each basic type of emergency...to determine if all staff is aware of the emergency as well as to identify potential areas that could cause problems in the handling of an emergency. These drills need to be recorded and evaluated to ensure that procedures are being followed, that staff training is effective and what is learned is used to correct and/or improve the emergency procedures. Records of these drills must be maintained and improvements in the procedures duly noted whenever such are identified”. (2010 Accreditation Standards and Related Policies; 11.2 *Emergency Procedures* 11.2.3.

Topeka Zoo Response

The Topeka Zoo agrees with the observation and acknowledges that general description of incidents in the file is not an effective proxy for documentation of procedures, training, and maintenance of records especially where such recordkeeping has been inconsistent, not comprehensive, not up to date, and unusable and/or unused for training staff to ensure lessons are learned and corrective action is taken.

In response to observations of the Special Inspection Team during its December 3-4, 2009 inspection, the Topeka Zoo has, since December 15, 2009, initiated the following:

1. Conducted an elephant attack drill.
2. Conducted a follow up debriefing of the drill at which minutes were taken and the record of the minutes filed. **Please see attached as Exhibit # 5.**
3. Established and implemented revisions to the Zoo Safety and Policy Handbook including:
 - a. The Emergency Policies—Notification in Emergencies and Crises (up dated the call-down list);
 - b. The Topeka Police Department Standard Operating Procedure regarding Topeka Zoo Animal Escape Procedures (in cooperation with the TPD); and
 - c. The Emergency Policies of the Topeka Zoo. **Please see attached as Exhibit # 6.**
4. Updated and distributed twenty (20) copies of the revised Zoo Safety and Policy Handbook to key locations throughout the Zoo and placed the Handbook on the Zoo's network for easy access and updating.
5. Established new protocols and a comprehensive schedule for regular escape and emergency drills and other staff training including:
 - a. CPR/first aid
 - b. Fire extinguisher training
 - c. Zoonosis
 - d. Electric fence training
 - e. Maintenance equipment safety
 - f. Food sanitation (human and animal)
 - g. Enrichment safety and controlled drug safety

Other steps to be taken are included in the Action Plan below along with a projected implementation schedule.

Action Plan:

1. Form staff teams to develop written and verbal drill scenarios on or before March 1, 2010.

2. Conduct a Tornado Drill (severe weather) on March 12, 2010.
3. Implement the new adopted Topeka Zoo drill schedule, which is effective immediately, to ensure that from and after the second quarter of 2010, the Topeka Zoo shall conduct escape and emergency drills on a quarterly basis with two (2) drills conducted per quarter:

Second Quarter: (April—June): (1) Injured Visitor; (2) Animal Escape

Third Quarter (July—September): (1) Elephant Drill, type TBD) and (2) Lost Child

Fourth Quarter (October-December): (1) Fire Drill; (2) Staff Injury

First Quarter (January-March): (1) Tornado Drill; (2) Animal Escape Drill

4. Establish the new protocols and the new training schedule for the other safety training on or before March 31, 2010.
5. Review and update the emergency call-down list by the Registrar on an as needed basis but not less than every six (6) months beginning July 1, 2010.
6. Establish and implement a work schedule that ensures the presence of a supervisor on grounds during weekends and holidays on or before March 31, 2010.
7. Conduct zoonosis training and enrichment safety and controlled drug safety training following the appointment of a full-time veterinarian on or before May 3, 2010.

C. Management practices give rise to specific safety concerns in the zoological collection.

- 2. The lack of objective performance evaluation and concurrent progressive discipline for critical errors fails to improve employees' capabilities and erodes important peer trust.**

Topeka Zoo Response

The Topeka Zoo agrees with the observation. Neither the Topeka Zoo staff nor its interim director is pleased with what has been the past inconsistent disciplinary practice of previous management. In early

February Topeka Zoo staff began surveying other zoos as part of the research needed to develop a more objective and effective disciplinary process for evaluating critical errors of staff.

Staff is compiling the responses and developing ideas for transmission to the city Human Resources Department for its review, analysis, and advice. Following the Zoo's submission of its proposed evaluation and disciplinary approach, we expect city Human Resources to compare and contrast our ideas with the existing practices currently applied throughout city government. After such a review and subsequent discussion, we expect to adopt revised clear, unambiguous, and reasonable objective criteria that shall be applied to all staff, thereby addressing the goals of improving staff capabilities, eliminating the fact or perception of favoritism, and re-establishing and enhancing trust.

In the interim period between February 15, 2010 and the date that the city Human Resources Department and the new Zoo Director are able to concur on a revised progressive discipline regime it shall not be the policy or the practice of the interim zoo director to transfer staff from one position in the organization to another for disciplinary reasons.

Action Plan

1. Submit a proposal for changes in the Topeka Zoo's policies and practices in performance evaluation and progressive discipline for critical errors to the city Human Resources Department on or before March 31, 2010.
2. Review of the Topeka Zoo's proposal on performance evaluation and progressive discipline completed by the city Human Resources Department on or before April 30, 2010.
3. Agree on changes in the disciplinary policies and practices at the Topeka Zoo after discussion between the city Human Resources Department and the new Zoo Director on or before June 15, 2010.
4. Adopt new disciplinary policies and practices for critical errors at the Topeka Zoo on or before July 1, 2010.

C. Management practices give rise to specific safety concerns in the zoological collection.

3. **Training procedures must reflect the level of responsibility undertaken when caring for potentially dangerous animals and adequate time and training content provided to staff. Personnel management methods do not appear to be in keeping with "best practices" to bring about top performance of employees.**

Topeka Zoo Response

The Topeka Zoo agrees with the observation that past and present training and performance evaluation practices of new employees and present employees transferring from one range to another have been inadequate in assuring the training has been effective.

The lack of adequate preparation prior to assuming significant levels of responsibility for potentially dangerous animals has been problematic, especially for transferring employees, since the reasons for the transfers have not always been for the purposes of cross-training, professional growth and development, or promotional opportunities but have been used by management to avoid initiating corrective action, providing supplemental training, or effecting progressive discipline.

During the period between February 15, 2010 and the date that the city Human Resources Department and the new Zoo Director are able to concur on revised minimum standards for training of new or transferring staff it shall not be the policy or the practice of the interim zoo director to transfer non-zookeeper staff to zookeeper positions nor to transfer zookeeper staff to different ranges on which they have not been trained. Finally, for both budgetary and organizational reasons, the interim zoo director shall not hire additional or replacement zookeepers during his tenure. Should positions become vacant between now and the arrival of a new Zoo Director, they shall remain vacant.

Action Plan

1. Submit a proposal for changes in the minimum standards for training of new transferring staff to the city Human Resources Department on or before March 31, 2010.
2. Review of the Topeka Zoo's proposal for changes in training standards completed by the city Human Resources Department on or before April 30, 2010.
3. Agree on changes in the training standards for new and transferring employees after discussion between the city Human Resources Department and the new Zoo Director on or before June 15, 2010.
4. Adopt new training standards for new and transferring employees at the Topeka Zoo on or before July 1, 2010.

V. Management (not previously mentioned)

- A. **Making misleading statements to staff and the public is unacceptable and damages the institution both internally and externally.**

Topeka Zoo Response

The Topeka Zoo agrees with above observation. Thanks to the observations made by the AZA Special Inspection Team and with the cooperation of Topeka Zoo staff and the staff of other City departments, we are confident that the actions we have taken and the plans we have outlined for near-term organizational, procedural, and personnel changes have established a solid foundation for a new leadership team at the Topeka Zoo to restore the trust and confidence of the citizens of the city of Topeka and of the Association of Zoos and Aquariums.

VI. Governance

- A. **With professional management in place, the Zoo can prosper under the current model of governance. There is also an opportunity to look objectively at the potential for a public/private partnership commonly seen among accredited institutions.**

Topeka Zoo Response

We appreciate the observation. If the City Manager so directs, the Performance Management Coordinator will, during the coming year, research other models of governance in the interest of ensuring the Topeka Zoo's continuing improvement and its awareness of best practices of governance of zoos that may have applicability for our zoo operations.