

# Staff Report

## April 2026

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### Focused Review:

Processes and Procedures  
Used for Domestic  
Agricultural Animal  
Seizure Cases.

- Department of Agriculture,  
Poultry & Animal Health
- Office of Animal Welfare

**153<sup>rd</sup> General Assembly, 2<sup>nd</sup> Session**

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*Respectfully submitted to the  
Joint Legislative Oversight and Sunset Committee*

Authored by: Division of Legislative Services



JOINT LEGISLATIVE OVERSIGHT  
& SUNSET COMMITTEE

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## Department of Agriculture Office of Animal Welfare

### Focused Review: Processes and Procedures Used for Domestic Agricultural Animal-Seizure Cases.

This focused review examined the structure, processes, and statutory framework governing domestic agricultural animal welfare enforcement, highlighting how the Department of Agriculture and Office of Animal Welfare interact.

The review found that while both agencies perform important roles in responding to animal welfare concerns involving domestic agricultural animals, high staff turnover and differences in statutory authority, documentation practices, and data systems create challenges for coordinating domestic agricultural animal welfare enforcement cases.

***“High staff turnover and differences in statutory authority, documentation practices, and data systems create challenges for coordinating domestic agricultural animal welfare enforcement cases.”***

Key issues identified during the review include:

- Divided statutory responsibilities between agencies involved in domestic agricultural animal welfare cases.
- Differences in written procedures governing investigations and enforcement actions.
- Record-keeping systems are not standardized, as DDA discontinued use of the system used by OAW and other statewide law-enforcement agencies, limiting information-sharing and creating communication challenges and safety risks when cases occur outside DDA’s operating hours.
- DDA’s public reporting is limited compared to OAW, and DDA does not maintain vendor procedures, reducing overall transparency.
- Limited formal coordination mechanisms, including the absence of a memorandum of understanding between the agencies.
- Staffing and training challenges that may affect investigative capacity and case continuity.

**The report identifies opportunities to improve interagency coordination, documentation practices, and statutory clarity, which could enhance transparency and consistency in the handling of domestic agricultural animal welfare cases.**

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**Special thanks: We appreciate the support of the Delaware Office of Animal Welfare and Department of Agriculture staff in preparing this report.**

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## I. About This Report

This staff report, prepared by the Division of Legislative Services (“DLS”), provides a focused review of the processes and procedures used for animal welfare cases involving domestic agricultural animals, specifically imminent danger and seizure, used by the Delaware Department of Agriculture (“DDA”), Poultry & Animal Health and relevant information from the Office of Animal Welfare (“OAW”) under the Delaware Department of Health and Human Services (“DHSS”), Division of Public Health (“DPH”). The Joint Legislative Oversight and Sunset Committee (“JLOSC” or “Committee”) selected this topic and assigned it to the Division of Legislative Services staff on May 9, 2024.<sup>1</sup>

JLOSC is a bipartisan 10-member legislative body which performs periodic legislative review of the performance and activities of state entities designed to increase accountability and improvement. The primary purpose of any JLOSC review is to assess genuine public need and performance of the entity under review. JLOSC performs its duties with support provided by the dedicated and objective staff of DLS. DLS serves as an independent and confidential reference bureau for the General Assembly and supplies many services, including staff support for JLOSC.

JLOSC staff completes focused reviews as assigned by majority vote of JLOSC members. A focused review contrasts with the broader evaluation of a full review and evaluates a component within an entity, such as a specific statute, policy, rule, regulation, or program related to the entity. The Committee and its staff define the scope of a focused review, guiding the research process. Once the research is completed, a staff report is prepared for JLOSC members, summarizing the research, findings, conclusions, and recommendations.

JLOSC staff prepared this report following research conducted in line with an agreed-upon project scope. The focused review adhered to national evaluation standards, requiring thorough planning and execution to gather sufficient evidence supporting the findings and conclusions based on the review’s objectives and scope. Staff believe the evidence obtained provides a reasonable basis for their findings and conclusions. Additionally, the Objectives, Scope, Methodology section discusses the fieldwork procedures used while conducting the research and developing this report.

This staff report may contain recommendations for JLOSC to review and discuss. Committee members are not obligated to adopt the staff’s recommendations and may modify or reject them, or propose new ones. Final recommendations are determined during public meetings and adopted with an affirmative vote from 7 members. Once JLOSC adopts recommendations, the review progresses to the implementation phase, which may involve drafting legislation.

### Next Steps

JLOSC will hold a public meeting to receive an overview of the staff report and accept public comment on the scope of the review.<sup>2</sup> Following this, the Committee will determine the appropriate next steps, which may include adopting recommendations or scheduling additional meetings for further discussion.<sup>3</sup>

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<sup>1</sup> Review topic inspired by legislator correspondence requesting a review of OAW, based on recent seizures in the legislator’s district and the language in Title 16, Chapter 30F, which assigns enforcement of animal-welfare cases involving domestic agricultural animals to DDA.

<sup>2</sup> Public meeting notices found on the Committee’s website and the State of Delaware’s Public Meeting Calendar.

<sup>3</sup> 29 Del. C. § 10214.

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## II. Objective, Scope, Methodology

### Objective

To evaluate the processes and procedures used for animal welfare cases involving domestic agricultural animals, specifically imminent danger and seizure.

### Scope

This focused review examined the processes and procedures used by DDA in cases involving imminent danger and the seizure of domestic agricultural animals, as outlined in Title 16, Chapter 30F, for the period of January 2021 through March 2025. Information related to livestock-at-large cases was also reviewed, as these incidents involve animal welfare concerns and may result in the seizure of domestic agricultural animals. Because OAW assists DDA in these matters, the review additionally considered related information, including staffing, training materials, procedures, and communications between the 2 agencies.<sup>4</sup>

### Methodology

This review relied on documentation and information provided by DDA and OAW. In several instances, data supplied by DDA lacked consistent identifiers linking complaints, investigations, seizure cases, and associated expenditures. The scope of the review focused primarily on procedures, documentation practices, and interagency coordination rather than attempting to reconstruct the full outcomes of individual cases. The review did not independently verify the accuracy of all agency records and did not assess the disposition of specific enforcement actions. Fieldwork consisted of reviewing publicly available information, analyzing data sets provided by the agencies, and conducting agency site visits.

### Fieldwork Completed

- Reviewed relevant websites, public documents, and news articles.
- Reviewed related legislation and regulations.
- Reviewed information supplied by DDA staff, including:
  - Staff organizational chart for employees handling animal-welfare matters.
  - Systems used to log and track animal-welfare complaints.
  - Methods used to communicate with OAW.
  - Spreadsheets of animal-welfare concern calls and investigations:
    - SharePoint data 2016-2021.<sup>5</sup>
    - Livestock complaint log 2023-2024.
    - US Herds incident log 2024-2025.
  - Statement of CAD use 2021 to 2023.
  - Spreadsheet of animal-welfare enforcement actions, including seizures.

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<sup>4</sup> This information covered a period of January 2021 – October 2024. Due to scheduling conflicts information requested from DDA for the same period was not obtained until April 2025 and covered a longer period.

<sup>5</sup> This analysis relies solely on data within the review period, which in this case includes only the 2021 spreadsheet entries.

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- Written procedures for:
    - Livestock Neglect or Cruelty Investigation Process.
    - Livestock at Large Response Process.
  - Animal-welfare record-retention schedule.
  - New-hire training related to animal-welfare cases.
  - List of approved animal-sheltering vendors.
  - Copies of animal boarding facility provider agreements/memorandums of understanding (“MOU”).<sup>6</sup>
  - Sheltering care rates.
  - Department funds budgeted for impounded-animal care (FY 2021–2024).
  - Department funds spent on impounded-animal care (FY 2021–2024).
  - Funds recovered from owners/custodians (FY 2021–2024), including proceeds from sales or auctions.
  - Sample vendor invoice.
  - Sample communication sent to owners or custodians.
  - PDF of animal welfare vouchers (FY 2021–2024) included information such merchandise and paid amounts, dates, vendor information, descriptions.<sup>7</sup>
  - Site visit to DDA office and interviewed staff.
  - Site visits to all OAW offices and conducted staff interviews.
  - Reviewed information supplied by OAW staff, including:
    - Staff organizational chart.
    - Methods used to communicate with DDA.
    - Log of all interactions with DDA January 2021 – October 2024.
    - CAD information and note examples.
    - Animal control officer training information, including staff information and turnover rates.
    - Brandywine Valley signed contract 2024.
    - Internal OAW Delaware Animal Services policy manual.

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<sup>6</sup> These documents were provided in response to JLOSC staff’s request for signed animal-sheltering contracts. Eleven files were submitted, each titled as an “animal boarding facility provider agreement” and file names labeled as an MOU. DDA’s written neglect and cruelty policy states that an MOU is to be established with the designated sheltering location.

<sup>7</sup> JLOSC staff converted PDF into Excel format.

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### III. Review Background

Delaware’s animal welfare enforcement system has undergone significant restructuring over the past decade, driven by legislative reforms and recommendations from a legislative task force. This effort began in 2010 with the transfer of dog-control responsibilities from the Department of Natural Resources and Environmental Control (“DNREC”) to the counties. Under this structure, enforcement was carried out by nonprofit Societies for the Prevention of Cruelty to Animals (“SPCAs”) and county governments. However, this decentralized approach resulted in limited oversight, non-uniform training, uneven service quality, varying levels of expertise, and inconsistent enforcement practices. These challenges—along with concerns raised by policymakers and animal welfare advocates—led to the creation of the State Animal Welfare Task Force in 2012, which recommended establishing a unified, professionalized statewide enforcement model.<sup>8</sup>

Building on these recommendations, legislative reforms beginning in 2014 clarified the respective roles of OAW and DDA, centralized primary enforcement authority under OAW, standardized training requirements, and reassigned key responsibilities such as dog control, dangerous-dog management, and stray-livestock response. These changes led to the establishment of OAW in 2014 and the launch of Delaware Animal Services in 2015, creating a more coordinated statewide system in which OAW oversees companion-animal welfare while DDA retains authority over domesticated agricultural animals.<sup>9</sup>

Concerns regarding training and qualifications were a central focus of the task force’s work. Members of the public raised issues about the lack of standardized training and certification for animal control officers and animal cruelty agents, many of whom were performing law-enforcement functions such as executing warrants, issuing citations, and seizing evidence. In response, the task force recommended that OAW develop and implement statewide training and certification requirements.<sup>10</sup> The intent was to enhance safety for the public, officers, and animals; reduce risks associated with inadequately trained personnel; and promote greater consistency across agencies.

Today, these reforms are reflected in a standardized training program delivered through Wilmington University. The program is approximately five weeks in length, and all individuals serving as animal welfare officers under both OAW and DDA are required to complete the training and obtain certification.<sup>11</sup>

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<sup>8</sup> Senate Concurrent Resolution 44, 146<sup>th</sup> General Assembly, passed June 2012.

<sup>9</sup> [3 Del. C. § 101\(8\)](#).

<sup>10</sup> House Bill 311 as amended by House Amendment 1, 147<sup>th</sup> General Assembly, signed July 2014.

<sup>11</sup> [16 Del. C. § 139](#).

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## IV. Investigation and Enforcement Processes

During this review, OAW provided JLOSC staff with a comprehensive 34-page internal manual detailing its processes and procedures, including staff responsibilities and workflows for animal welfare cases, such as animals at large. In contrast, DDA provided limited documentation, consisting of a 4-page neglect and cruelty policy, a 3-page livestock at large policy, and a 1-page records retention policy.

To better understand DDA's approach to livestock welfare and livestock at large cases, the 2 relevant policies are summarized below:

### DDA Livestock Neglect or Cruelty Investigation Process

**1. Complaint Received:** Complaints regarding livestock neglect or cruelty may be submitted by phone or email from the public, other agencies, or staff. Anonymous reports are accepted. Basic details—such as the type and number of animals, location, and potential owner—are collected and entered into the case management system.

**2. Complaint Review and Assignment:** Each complaint is reviewed and prioritized based on factors such as severity, available evidence, and environmental conditions. It is then assigned to an investigator or inspector for follow-up.

**3. Initial Investigation:** The investigator attempts to contact the animal owner and assess the reported conditions. Entry onto private property is permitted only with owner consent or a search warrant. Observations may also be made from public areas or neighboring properties with permission. During the assessment, investigators evaluate shelter, access to food and water, property hazards, and the need for veterinary care.

**4. Case Determination:** After the investigation, the complaint is classified as either of the following:

- **Unfounded**, resulting in case closure.
- **Founded**, requiring corrective action or enforcement.

**5. Corrective Action (conditions can be improved):** If DDA determines from the investigation that conditions are inadequate but fixable, the owner may receive a correction notice outlining required improvements and a deadline for compliance. Investigators may offer education and resources to support corrective efforts. A follow-up inspection is conducted to confirm compliance.

**6. Emergency Veterinary Care (animal in immediate danger):** When DDA determines from the investigation that an animal is in imminent danger or suffering from a serious untreated injury or illness, the owner may be ordered to obtain emergency veterinary care within a specified timeframe.

**7. Search Warrant and Seizure (severe conditions or owner fails to comply):** If the owner cannot be reached, fails to comply with corrective orders, or the animal's condition requires urgent intervention, DDA investigators may obtain a search warrant and remove the animals by contacting and coordinating with OAW. An OAW animal control officer corroborates the on-site conditions to determine whether seizure is necessary, after which the DDA investigator provides the evidence needed for the warrant. Before the warrant is requested or executed,

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DDA investigators must secure appropriate livestock housing, and an MOU must be established with the sheltering provider at approved reimbursement rates.

**8. Seized Animal Care:** Seized animals are transported to a facility for veterinary evaluation and care. Upon intake, animals are identified, photographed, examined by a veterinarian within 24 hours, and housed appropriately, with all necessary medical and supportive care provided; deceased animals undergo necropsy, and poultry are tested for respiratory diseases. Animals are then sheltered for 15 days at the owner's expense, and the owner must continue paying each 15-day estimate sent by regular and certified mail to retain ownership.<sup>12</sup> If the owner defaults at any point, the animals become property of the state, after which rehabilitated animals may be sold, adopted, or ownership transferred.

### **DDA Livestock at Large Response Process**<sup>13</sup>

**1. Complaint Received:** Complaints that livestock are running at large may be submitted by phone or email from the public, other agencies, or staff. Information collected includes the location of the animal, whether the owner is known, and contact details for the reporting party. Complaints are documented in the USAHerds system.

**2. Complaint Review and Assignment:** Each complaint is reviewed and prioritized based on potential safety risks—such as danger to motorists, property damage, or risk to the animal. The case is then assigned to an investigator or agricultural inspector for response.<sup>14</sup>

**3. On-Scene Response:** Investigators or agricultural inspectors respond to the reported location to confirm that the animals are at large and attempt to safely contain or capture them. Assistance from OAW or other agencies may be requested when needed.

**4. Determine Ownership:** Investigators attempt to determine whether the animals' owner is known. Repeated incidents may result in warnings followed by civil penalties.

- If the owner is known, investigators attempt to contact them.
- If the owner is present, education or warnings may be issued depending on prior incidents.
- If the owner is not present, investigators may secure the animals when possible and leave a contact notice.

**5. Temporary Removal of Animals:** If the animals cannot be safely contained or pose a public safety risk, they may be removed for safekeeping.<sup>15</sup> Animals may be transported to a

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<sup>12</sup> [16 Del. C. § 3035F\(c\)](#).

<sup>13</sup> This policy does not reference Title 3, Chapter 77, which governs stray livestock, and it omits several Title 3 requirements. Some of the omitted requirements are that livestock ownership cannot transfer until at least 7 days after an animal is found running at large, the statutory exceptions for animals under the control of a driver, and the liability limitations for owners who earn at least 25% of their income from agricultural production.

<sup>14</sup> Agricultural inspectors may be called in to help capture animals and are dispatched to urgent situations when an investigator is unavailable.

<sup>15</sup> Animals may be removed only when they are running at large on public highways or on property other than the owner's and cannot be removed from the owner's premises—even if they are not properly contained.

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sheltering facility.<sup>16</sup> Upon intake, animals are documented and publicly posted to help identify the owner.

**6. Unidentified Owner:** If no owner can be identified after reasonable attempts:

- Animals may be transferred to First State Animal Care and SPCA.
- When appropriate, animals may be adopted through the shelter.
- If adoption is not suitable (e.g., commercial livestock), animals may be transferred or sold through auction.<sup>17</sup>

## **DDA Processes Compared to Relevant Statutes and Regulations**

JLOSC staff compared the 2 written DDA policies with the relevant statutes and regulations. Livestock at large matters fall under Title 3, Chapter 77 and animal welfare provisions under Title 16, Chapter 30F. In addition, DHSS maintains regulations governing animals held in shelters and the certification of animal welfare officers under Sections 4501 and 4502 of Title 16 of the Delaware Administrative Code. Although Title 3, Chapter 77 authorizes DDA to promulgate regulations for the administration and enforcement of livestock at large, regulations have not been adopted, resulting in limited formal guidance for implementation.<sup>18</sup>

In contrast to the lack of regulatory structure, DDA has statutory authority to issue civil penalties ranging from \$50 to \$1,000 for livestock running at large—but only after a hearing is held.<sup>19</sup> This framework differs from typical civil-penalty structures in Delaware, where agencies issue penalties administratively and provide an opportunity for appeal. Requiring DDA to establish the basis for a penalty through a hearing prior to issuance creates inefficiencies and, in practice, has limited the agency’s ability to impose penalties.

Statutory inconsistencies also emerge when comparing impoundment and disposition authorities. Under Title 3, Chapter 77, DDA may impound and dispose of stray livestock; however, these provisions do not address livestock involved in animal welfare cases under the OAW’s authority in Title 16, Chapter 30F. While Title 16 references placement with an appropriate shelter, it is unclear whether the shelters contemplated under this framework are the same shelters that DDA uses, and Title 16 is silent on disposal, creating ambiguity in how welfare related cases should be handled.<sup>20</sup>

Differences are further evident in sheltering oversight and care requirements. Title 3 authorizes DDA to impound livestock in a humane and adequate shelter, with the State Veterinarian responsible for determining appropriate care and setting daily costs.<sup>21</sup> By comparison, OAW, operating under Title 16, has established protocols for investigations, shelter standards, and annual inspections.<sup>22</sup> However, OAW’s regulations do not clearly

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<sup>16</sup> The written policy directs staff to contact First State Animal Care and SPCA for all sheltering services and does not provide guidance for securing any other sheltering options.

<sup>17</sup> The written policy identifies Dill’s Livestock Auction as the auction house that DDA uses.

<sup>18</sup> [3 Del. C. § 7707.](#)

<sup>19</sup> [3 Del. C. § 7701\(b\).](#)

<sup>20</sup> [16 Del. C. § 3001F.](#)

<sup>21</sup> [3 Del. C. § 7702\(a\).](#)

<sup>22</sup> [16 Del. C. § 3008F.](#)

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reference DDA, and livestock are only minimally addressed under euthanasia protocols.<sup>23</sup> Documentation reviewed by JLOSC staff, including DDA shelter MOUs, did not include provisions for inspections or ongoing State Veterinarian approval, highlighting a potential gap in oversight.<sup>24</sup>

Shelter cost recovery processes also differ between statutory frameworks. Title 3 allows DDA to recover reasonable costs for the care of impounded livestock but does not establish a defined enforcement mechanism or payment timeline. In contrast, Title 16 requires payment of care fees within 15 days in OAW cases.<sup>25</sup> DDA provided a sample care invoice that applies a 30-day payment deadline in practice, further demonstrating inconsistency between statutory authority and operational procedures.<sup>26</sup>

Finally, while Title 3 permits the disposal of unclaimed stray livestock through transfer of ownership or public auction—and DDA has utilized both methods—it is unclear whether authority under Title 3 extends to livestock seized in animal welfare cases.<sup>27</sup> This uncertainty reflects broader statutory overlap and fragmentation, as Title 3 provides DDA with livestock at large enforcement authority, while Title 16 provides OAW animal welfare authority.<sup>28</sup> Additionally, animal cruelty statutes reference impoundment provisions under Title 16, further complicating the applicability of Title 3 disposal provisions in welfare related cases for domestic agricultural animals.<sup>29</sup>

### **DDA-Collected Impound Fees**

During the review period, DDA reported receiving \$7,059 from the sale of impounded animals across 10 dates. The transactions cannot be matched to specific cases, however, because the reported dates do not align with the seizure records provided and do not include case number identifiers or animal-type information.

Similarly, DDA reported collecting \$28,331 in payments from owners or custodians of impounded animals between October 2021 and August 2022. Again, the absence of case numbers and animal-type details prevents the payments from being linked to the corresponding seizure data.

It is unclear whether the reported revenue—from both animal sales and care-related payments—pertains to livestock at large cases, animal welfare cases, or a combination of both.

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<sup>23</sup> [16 DE Admin. Code 4501.](#)

<sup>24</sup> The MOU agreements included a provision requiring organizations to obtain prior written approval from DDA before constructing new infrastructure to house animals received from DDA, with the organization bearing full cost if approval was not obtained in advance. Each agreement contained an official approval section with DDA employee signatures—typically the State Veterinarian and the DDA Secretary. Some contracts, however, were signed by a Department Manager instead of the Secretary or included no signatures at all.

<sup>25</sup> [16 Del. C. § 3035F\(c\).](#) Last updated by Senate Bill No. 109, 152<sup>nd</sup> General Assembly, enacted August 2023.

<sup>26</sup> DDA provided a sample care invoice from May 2021 but did not supply a more recent example reflecting the statutory change enacted in August 2023 that reduced the payment period from 30 days to 15 days.

<sup>27</sup> [3 Del. C. § 7704.](#)

<sup>28</sup> [16 Del. C. § 3035F.](#)

<sup>29</sup> [11 Del. C. § 1325\(e\).](#)

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## DDA-Approved Vendors

DDA provided a list of 10 approved vendors for animal sheltering services.<sup>30</sup> DDA did not provide policies or documentation explaining how DDA solicits vendors or how the agency identifies or addresses potential conflicts of interest.<sup>31</sup> Moreover, no statutes or regulations specific to DDA outline the process for selecting, compensating, inspecting, or monitoring livestock sheltering vendors.<sup>32</sup>

By comparison, OAW provided both its current shelter contract with Brandywine Valley and information indicating that the agency recently completed a request-for-proposal (“RFP”) process and is finalizing a new agreement. JLOSC staff readily located the associated RFP documentation through the Delaware bids and contracts website maintained by the Office of Management and Budget (“OMB”), Government Support Services, by searching the vendor’s name within the awarded vendors database.<sup>33</sup>

In contrast, similar searches for DDA sheltering vendors yielded no results. Based on the information provided, it is unclear whether DDA utilizes a formal RFP process for procuring animal sheltering services, and documentation was not provided to indicate that a process is in place.

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<sup>30</sup> MOUs were provided for each vendor; however, they did not specify the types of animals the vendor was authorized to shelter.

<sup>31</sup> DDA’s written neglect and cruelty policy requires an MOU with the designated sheltering location, while the Department’s livestock at large policy identifies First State Animal Care and SPCA as the sole sheltering provider and Dill’s Livestock Auction as the sole auction provider.

<sup>32</sup> In November 2023, the Public Integrity Commission issued letters of reprimand, finding violations of state law occurred by allowing a DDA employee to engage in a vendor agreement with the DDA and by creating an appearance of impropriety by contracting with a DDA employee for work unrelated to the employee’s job duties.

<sup>33</sup> Awarded vendors found at <https://mmp.delaware.gov/Vendor>.

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## V. Complaint Volume, Tracking, and Communication

DDA reported responding to 284 welfare concerns and 318 livestock at large concerns, and 20 concerns involving both during the review period of January 2021 through March 2025.<sup>34</sup> Of these concerns, 15 of 304 animal welfare concerns were reported with seizures with DDA seizing a total of 806 domestic agricultural animals.

DDA explained that its animal welfare process for domestic agricultural animals generally begins with the receipt of a complaint, followed by an on-site investigation conducted by an investigator or other DDA staff. Based on the findings, DDA may issue corrective actions and conduct follow-up visits to confirm compliance. If corrective actions are not completed—or if conditions are sufficiently severe that corrective measures are not appropriate—DDA refers the case to OAW for enforcement.

OAW serves as the State’s primary animal welfare law enforcement authority, while DDA does not operate with traditional law enforcement powers. However, statutory language in Title 16, Chapter 30F introduces some ambiguity, as it states that “the Department of Agriculture shall have the power to investigate, search, seize and issue criminal summons when investigating and enforcing animal cruelty laws.”<sup>35</sup>

In certain situations, DDA may also request assistance from the Delaware State Police. In practice, state police generally defer to OAW as the specialized agency for animal abuse cases and typically respond only when there is an immediate safety risk. Additionally, because OAW officers are unarmed, State Police support is required if the situation escalates.

From January 2021 through October 2024, OAW reported that it manages all enforcement actions, including warrants issued through Justice of the Peace Court, coordination with the Attorney General’s Office, and evidence submission through Evidence.com. During this period, OAW reported responding to 49 DDA-related cases, assisting with 36 additional cases, and issuing 10 warrants. DDA stated that it did not have responsive records for JLOSC staff’s request for a similar log or records of OAW interactions during the review period.

Differences in communication and recordkeeping practices between the 2 agencies were observed, particularly in how complaints and case information are documented and shared. OAW, like law enforcement agencies statewide, uses a Computer-Aided Dispatch (“CAD”) system that provides structured case documentation, address histories, and investigative notes. This system enables officers to identify repeat calls and access relevant case information prior to responding.

In contrast, DDA has relied on multiple systems over time—including SharePoint, CAD, spreadsheets, and USAHerds—to log complaints and investigations. DDA discontinued CAD use in 2023 when the DDA investigator who was using CAD resigned. Except for CAD, these

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<sup>34</sup> DDA explained that the logs show a gap between 2021 and 2023 because, during that period, DDA was using the CAD system and “do not have a way to log cases through this system.”

<sup>35</sup> [16 Del. C. § 3031F\(f\)](#).

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other DDA systems are not accessible to or shared with law enforcement agencies or OAW. In addition, no memorandum of understanding (“MOU”) exists between DDA and OAW to standardize information-sharing or align documentation practices.

As a result, OAW officers may respond to DDA-initiated cases without access to complete case information. This occurs in the context of differing operational schedules, as DDA does not operate on a 24-hour basis, while OAW and other law enforcement agencies provide continuous coverage. Livestock at large incidents and agricultural animal welfare calls occur outside of DDA’s normal business hours with OAW and other law enforcement agencies responding to incidents without direct access to DDA case records.

Related to the CAD system, field communication protocols—particularly the use of radios—are integrated into OAW operations and support real-time coordination and officer safety during responses.<sup>36</sup> OAW animal welfare officers use radios to confirm their status when dispatched; if an officer does not check in, additional personnel are deployed following unsuccessful contact attempts. These procedures, including the use of radios, are incorporated into OAW’s animal control officer training, discussed in greater detail in the Staffing, Training, and Turnover section of this report. During interviews with JLOSC staff, DDA personnel stated that investigators communicate with their supervisor, the State Veterinarian, by cellular phone while in the field. This method may limit communication in areas with weak or unreliable cellular service. DDA policies do not include formal safety communication protocols for responding to calls.

Both agencies maintain record-retention schedules, but the schedules differ, further underscoring the need for an MOU to align processes—particularly for cases that may result in animal seizures and subsequent legal action.

DDA provided several datasets illustrating its different complaint-logging practices.<sup>37</sup>

- SharePoint records covering 2016–2021 included 1,269 entries. Data from 2021 were used which referenced 72 welfare concerns and 60 livestock at large cases, but the data lacked owner information, consistent location details, and clarity on which cases resulted in seizures; some entries were marked as duplicates without explanation.
- Excel spreadsheet covering 2023–2024 contained 344 total entries, including 131 welfare cases, 171 livestock at large cases, and 18 cases involving both. However, complaint descriptions were inconsistently labeled, entered manually, and occasionally misspelled, and the dataset did not include information on final case outcomes.

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<sup>36</sup> Following enactment of legislation establishing OAW, OAW reported providing safety-related recommendations and operational support to DDA, including offering access to its CAD system (which DDA used briefly before discontinuing), advising the use of CAD-compatible radios, and recommending on-scene communication protocols; DDA did not establish an MOU with OAW for the provision of recommendations or operational support, and OAW reported that DDA personnel do not use radios to communicate with OAW staff.

<sup>37</sup> This information is reported as received and JLOSC staff did not observe the actual systems from which the data was extracted. It is unknown if additional entry fields exist in these systems or if information is stored in other places. Additional information was provided on the functionality of USAHerds, but it is unknown if DDA is using the system to its full potential.

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- USAHerds data covering 2024–2025 included 177 cases, including 81 involving welfare concerns and 87 livestock at large cases, and 2 cases involving both but lacked owner information, seizure details, and comprehensive case notes.

For additional context, DDA provided the following information regarding various complaint-logging practices:

- October 2016–September 2021: DDA logged animal-welfare cases in SharePoint, including notes, case communication records, and staff assignments.
- October 2021–2022: SharePoint retired, DDA switched to the CAD system, which is also used by OAW and law enforcement to record cases, keep notes, and case communications.<sup>38</sup>
- 2023–June 2024: After the Investigator II person who was trained on and used the CAD system left the agency, DDA recorded cases and notes in a shared spreadsheet in Microsoft Teams.<sup>39</sup>
- June 2024–present: DDA began using USAHerds (Animal Health Emergency Reporting Diagnostic System) by Acclaim Systems to store complaints, case communications, photos, and enforcement actions.<sup>40</sup>

## DDA Public Reports

DDA did post livestock at large enforcement actions on its public website, but the last entries—covering July through August 2018—were removed around December 2019, and no additional enforcement activity has been reported online since. Although DDA reported issuing 1 civil penalty in April 2021 for \$5,000, the penalty was not collected, and no public posting of this citation was found on the agency’s website. Public reporting of civil penalties for livestock at large is not required by statute, and it is unclear why DDA engaged in this practice prior to 2021. In contrast, animal welfare enforcement actions were not found to have been publicly reported, and DDA does not publish an annual report containing this information. OAW does publish an annual report with various performance measures and service call information.

DDA does maintain a website, although it is sparse. The poultry and animal health section has information for reporting livestock at large or welfare concerns under only the “Contact Us” section, but in-depth information or policies are not available. The public can contact DDA only during business hours; concerns needing immediate attention that occur after hours, weekends, and holidays are directed to OAW. In contrast, OAW’s website has information explaining animal cruelty, explains their shelter facilities, provides for records requests, and has an online reporting form for nonemergency animal control violations.

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<sup>38</sup> Single DDA investigator primarily used CAD system.

<sup>39</sup> Position was vacant for long stretch of time.

<sup>40</sup> OAW does not have access to USAHerds. DDA stated this will be the system their agency will use for the foreseeable future.

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## VI. Staffing, Training, and Turnover

DDA reports in its organizational chart that several positions contribute to domestic agricultural animal welfare work:

- (1) State Veterinarian – oversight of the livestock welfare program.<sup>41</sup>
- (1) Deputy State Veterinarian – oversight of the animal welfare program.
- (1) Administrative Specialist II – takes phone calls about complaints.
- (2) Investigator II – primary case investigator.
- (2) Agricultural Inspector – may serve as investigator when Investigator II positions are vacant and assist with collecting animals found at large or under seizure.

These role descriptions differ from the submitted written policies governing livestock neglect or cruelty investigations, which state that when the investigator position is vacant, OAW may be asked to conduct the initial assessment on DDA’s behalf. The written livestock at large policy also states that agricultural inspectors will be dispatched for urgent calls when the investigator is out of the office or responding to another incident. Since DDA’s complaint logs do not identify which employee responded to each call, it is not possible to determine which staff conducted field investigations.

JLOSC staff could confirm that only DDA Investigator II staff have documented completion of OAW’s animal control officer training. Other DDA personnel—including the State Veterinarian, Deputy State Veterinarian, and Agricultural Inspectors—have not completed this training, despite being involved in field responses and enforcement-related activities, or overseeing these responsibilities.<sup>42</sup> High turnover among DDA investigators further exacerbates this issue, leaving veterinarians and agricultural inspectors as the most consistent personnel, even though they are not certified animal control officers. This practice conflicts with the original intent of Delaware’s standardized training requirement, which was created after the public expressed serious concern about untrained officers performing law-enforcement or law-enforcement-like duties.

Both DDA and OAW experience significant turnover in investigative positions. Over the past 5 years, 2020 through 2025, OAW has trained 5 DDA investigators for their 2 investigator positions. OAW’s turnover is also substantial: in a 3-year period, 2022 through 2025, OAW trained and certified 60 officers who subsequently left the agency.<sup>43</sup> Many new OAW hires depart within a year—sometimes within months—often for positions with similar pay but fewer physical, emotional, and safety demands. High turnover also creates risks for case continuity, including the potential for cases to be weakened or dismissed in court if the original investigator is no longer available to testify.

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<sup>41</sup> DDA’s organizational chart references an “animal welfare program,” which is established under 16 Del. C. § 3031F, and a separate “livestock welfare program,” which does not appear in statute.

<sup>42</sup> This observation is based on a comparison of available training records. OAW supervisors have completed the animal control officer training, and best practices indicate that supervisors should complete the training to ensure a full understanding of the work being supervised or, if necessary, to assume those duties in the event of staff turnover.

<sup>43</sup> During this period, the agency had 34 total positions, 7 of which were classified as casual-seasonal.

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OAW's investigative roles are uniquely demanding. Investigators work evenings, weekends, and on-call shifts; handle dangerous or potentially rabid animals; respond to emotionally charged situations; and conduct physically strenuous work such as seizing large numbers of animals from hazardous environments. Despite these responsibilities—and the fact that OAW investigators are the only state personnel authorized to enforce criminal animal-cruelty statutes, write and serve search warrants, and make arrests—they do not receive hazard pay and their compensation is equivalent to investigator positions in other state agencies that do not carry comparable risks or workloads. Limited advancement opportunities further hinder recruitment and retention.

These realities make the animal control officer training critical. DDA investigators and OAW officers do not have identical schedules or caseloads, but the demand on DDA investigators is comparable to the demand on OAW officers.

Standardized training for animal-control officers was established following the recommendations of the 2012 State Animal Welfare Task Force, which sought to improve public and officer safety, reduce risks associated with inadequately trained personnel, and ensure consistent enforcement across agencies. Today, the statewide training program consists of approximately 160 hours over five weeks, delivered through Wilmington University in the state's first Animal Control Officers Academy, and covers investigative procedures, animal handling, and legal requirements. Attendees are certified at the completion of the program.

All individuals performing animal-welfare enforcement duties for OAW or DDA are required to complete this certification.<sup>44</sup> By statute, DHSS regulates this training and mandates 8 hours of annual continuing education.<sup>45</sup> However, as previously noted, some DDA staff involved in investigations—including veterinarians who supervise the program and may respond in the field—have not completed training. It is also unclear whether any DDA personnel fulfill the continuing-education requirement.<sup>46</sup>

Inconsistent training completion and the assignment of investigative responsibilities—including supervisory oversight—to staff without documented training within DDA do not align with the intent of Delaware's standardized training framework and present operational challenges. In addition, ongoing turnover across both agencies affects continuity within Delaware's animal-welfare enforcement system and contributes to operational challenges and risks.

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<sup>44</sup> [16 Del. C. § 3031F\(d\)](#).

<sup>45</sup> [16 Del. C. § 122\(3\)bb](#), [16 DE Admin. Code 4502](#).

<sup>46</sup> OAW offers 28-hour blocks of continuing education each fall and winter, covering topics such as courtroom procedures, mental health, report writing, and various areas of animal-welfare practice. Outside organizations also participate, providing training on issues including animal fighting and cruelty.

## VII. Financial Reporting

DDA reported that it historically and currently does not have funds budgeted for the care of impounded animals. DDA maintains a fee schedule for impound, daily boarding, and physical examination fees; the agency provided the following information:

Impound Fee: \$25.00 per animal

Boarding Reimbursement & Physical Examination Fees (\$)						
Service	Horse	Cattle (adult)	Pig or calf <200 lb	Sheep/Goat	Camelid	Poultry
Boarding Per Day	15/d	15/d	10/d	10/d	10/d	5/d
Physical Examination	50	50	50	50	50	25/cost covers up to 5 birds

DDA provided additional financial data in a PDF titled *Final Vouchers Animal Welfare FY21–FY24* which JLOSC staff converted into an Excel spreadsheet for analysis. After removing 112 entries with zero-dollar voucher amounts and 5 voided entries, 120 voucher lines remained with values in both the “Merchandise Amount” and “Total Voucher Paid” fields. These entries showed a total of \$289,085 in vouchers paid compared to \$264,255 in merchandise amounts—a discrepancy of \$24,830 for which an explanation was not provided. Voucher descriptions covered a wide range of services, including carcass disposal, boarding and impound fees, veterinary and lab services, transportation, and supplies; however, descriptions were inconsistent, with at least 16 different variations used to describe boarding-related services. Boarding and impound-related transactions represented the majority of spending.

Enforcement-related data showed similar inconsistencies. DDA reported issuing 21 notices to seek veterinary care, 48 improvement notices, and one civil penalty of \$5,000 for livestock at large in April 2021, which was not collected. An additional list of 34 citations totaling \$5,670 was provided, but the purpose of these citations cannot be determined from the data, and 7 entries lacked dollar amounts, noting only that the individual was “summoned to court.”

Efforts to match financial data to vendors and case records were also unsuccessful. While most vendors associated with boarding fees appeared in contract lists and had signed MOUs on file, 1 vendor did not, and the seized-animal log listed only shelter locations rather than vendor names. Payment records lacked case identifiers, and the seized-animal data did not indicate how much each shelter was paid. As a result, the information provided could not be reliably linked across complaint investigations, seizure records, payment data, or vendor logs. Overall, the data was inconsistent, incomplete, and not structured in a way that allows for comprehensive tracking of expenditures or enforcement actions.

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## VIII. Staff Findings and Recommendations

### **Staff Finding 1: Statutory responsibilities for domestic agricultural animal welfare are divided across agencies, creating operational complexity.**

OAW holds statewide enforcement authority for animal cruelty laws found in Title 11, Chapter 5, while DDA retains responsibility for domesticated agricultural animals covered in Title 3, Chapter 1. Many cases require coordination between the 2 agencies when investigations escalate to enforcement actions, including search warrants and animal seizures. The statutory framework does not clearly address all operational situations that arise when domestic agricultural animal welfare cases require enforcement by OAW. Additionally, statute modifications may be needed to effectively carry out duties such as enforcement of livestock at large and animal welfare cases. DDA and OAW may have unique or overlapping needs and should hold discussions about potential changes to clarify the law and therefore operations.

- **Staff Recommendation 1:** The General Assembly may wish to review and clarify statutory provisions governing domestic agricultural animal welfare enforcement to ensure that agency roles, enforcement authority, and responsibilities during seizure cases are clearly defined. DDA and OAW will convene discussions to clarify roles and evaluate whether statutory amendments are necessary to ensure agencies can effectively carry out their duties to enforce livestock at large and animal welfare cases. DDA and OAW will provide an update to JLOSC in January 2027.

### **Staff Finding 2: DDA maintains limited written procedures for animal welfare investigations compared to OAW. DDA does not maintain vendor procedures.**

DDA supplied only brief policy documents describing livestock neglect and livestock at large procedures. In contrast, OAW provided a detailed procedures manual outlining investigation workflows, enforcement protocols, and operational guidance. These differences in documentation may contribute to inconsistencies in case handling and coordination between the agencies. DDA also did not provide procedures or guidance for selecting or monitoring vendors used to shelter or auction livestock, including conflict-of-interest safeguards, and does not appear to use an RFP process comparable to OAW's.

- **Staff Recommendation 2:** DDA will consult with OAW to develop more comprehensive written procedures for domestic agricultural animal welfare investigations, ensuring consistent practices and improving coordination during joint investigations and enforcement actions. DDA will also establish a vendor policy that includes conflict-of-interest protocols, provides clear selection and monitoring processes, inspection and oversight of vendor performance, and incorporates an RFP process similar to OAW's. DDA will update JLOSC with its progress in January 2027.

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**Staff Finding 3: Record-keeping systems between the agencies are not standardized.**

DDA has used multiple systems over time—including SharePoint, CAD, spreadsheets, and USAHerds—to log complaints and investigations, and these systems, aside from Computer-Aided Dispatch (“CAD”), are not accessible or shared with law-enforcement agencies or OAW. In contrast, OAW, like law-enforcement agencies statewide, use a CAD system that provides structured case documentation, address histories, and investigative notes. Because DDA does not operate on a 24-hour basis, law-enforcement officers responding to DDA-initiated cases may have to do so without access to complete case information, creating potential safety risks. This challenge is compounded by limited communication between DDA and law-enforcement agencies on stray-livestock and animal welfare cases, which frequently occur outside DDA’s business hours. Related field communication protocols also differ: OAW uses radios to support real-time coordination and officer safety, including status checks and backup procedures, while DDA investigators reported using cellular phones to communicate with supervisors, and DDA policies do not include formal safety communication protocols for responding to calls.

- **Staff Recommendation 3:** DDA will coordinate with OAW to re-implement the CAD system and related radio equipment so that it is aligned with the system used by OAW and other statewide law-enforcement agencies, ensuring all parties always have access to the same information, including when DDA is outside its operating hours. CAD training is already incorporated into OAW’s animal welfare officer training program. DDA will also implement similar safety communication protocols for responding to calls. DDA will provide the status of this effort to JLOSC in January 2027.

**Staff Finding 4: No formal memorandum of understanding (“MOU”) exists between DDA and OAW to guide interagency coordination.**

Although the 2 agencies frequently work together on domestic agricultural animal welfare and livestock at large cases, no formal agreement defines communication protocols, information-sharing expectations, or documentation standards. As a result, agency coordination, consistency, and safety is at risk.

- **Staff Recommendation 4:** DDA will develop a formal MOU with OAW establishing procedures for information sharing, case coordination, and communication during domestic agricultural animal welfare and livestock at large investigations and enforcement actions. DDA will provide a progress update and share MOUs developed between DDA and OAW with JLOSC in January 2027.

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**Staff Finding 5: Data provided by DDA during the review lacked consistent identifiers needed to track cases from complaint to resolution.**

Several datasets provided by DDA—including complaint logs, seizure records, financial vouchers, and sheltering records—cannot be reliably linked due to missing case numbers, inconsistent descriptions, or incomplete information. These limitations reduced the ability to assess enforcement outcomes and program costs.

- **Staff Recommendation 5:** DDA will improve data-collection practices by standardizing data fields and requiring case number identifiers across complaint, enforcement, and financial records. Improved data structure will enhance transparency and allow better evaluation of program outcomes. DDA will coordinate with OAW to discuss best practices. DDA will update JLOSC with its progress in January 2027.

**Staff Finding 6: Training requirements are not consistently met for all DDA personnel involved in animal welfare investigations.**

State law requires individuals performing animal welfare enforcement duties to complete certified animal control officer training. DHSS regulations require annual continuing education after certification. While DDA investigators have completed the required training, other personnel involved in field responses or supervision—including veterinarians and agricultural inspectors—have not completed the certification program. It is unclear if DDA staff complete annual continuing education requirements. DDA training practices should align with OAW's model, in which all animal control officers and their supervisors complete the same initial certification and annual continuing education requirements.

- **Staff Recommendation 6:** DDA will coordinate with OAW to review staff training practices to ensure that personnel involved in domestic agricultural animal welfare investigations, field responses, or supervisory roles meet statutory training requirements and DHSS regulations, and receive required training, or limit enforcement and supervisor related duties to staff who have completed the required certification and annual continuing education. DDA will update JLOSC with its progress in January 2027.

**Staff Finding 7: Staff turnover affects investigative continuity and enforcement capacity.**

Both DDA and OAW experience turnover in investigative positions. Turnover can affect case continuity, training investments, and the ability to maintain experienced personnel in specialized animal welfare enforcement roles.

- **Staff Recommendation 7:** DDA and OAW should separately request compensation and classification reviews from the Delaware Department of Human Resources for investigator and key support roles. These reviews would help to determine whether current classification structures and pay ranges align with the complexity and legal requirements of animal welfare investigations, and whether these positions are compensated comparably to similar roles. The results of these reviews would then inform each agency's discussions with OMB and JFC during the budget process. DDA and OAW should provide updates to JLOSC in January 2027.

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**Staff Finding 8: DDA public reporting is limited, reducing transparency.**

Entities throughout the state publish annual activity reports that include basic caseload statistics, outcomes, and performance measures. DDA conducts enforcement and investigations that often result in the collection of fines, impounding of animals, and the sale or transfer of ownership of unclaimed stray livestock. Annual reporting that combines core metrics for legislators and the public is not required by statute, while other Title 3 boards who collect fines or fees have annual reporting requirements.

➤ **Staff Recommendation 8: Require an annual public report of complaint activity, outcomes, and timeliness.**

JLOSC may consider drafting legislation requiring DDA to submit an annual report to the Governor, General Assembly, and the Division of Legislative Services summarizing annual information such as:

- Total domestic agricultural animal welfare calls.
- Total livestock at large calls.
- Total number of seized animals, type of animal, and their final disposition.
- Total number of calls with OAW assistance.
- Total citations; including type, dollar amount, and status.
- Current vendors for sheltering services of domestic agricultural animals; include type of animals authorized to shelter.
- Total amount of sheltering fees paid to vendors.
- Total collected impound fees from owners.
- Current legislative and staffing needs.

JLOSC and DDA staff will work together to develop statutory revisions, incorporating technical corrections if appropriate.

**Staff Finding 9: Missing DDA regulations.**

Regulations have not been promulgated for the administration and enforcement of livestock at large cases.

- **Staff Recommendation 9:** DDA will review administration and enforcement of livestock at large needs and take the necessary regulatory procedural steps to create regulations. DDA will consult with OAW as needed and provide JLOSC with its progress in January 2027.

**Staff Finding 10: Holdover.**

Staff recommendations include action items that benefit from periodic progress updates. Beginning in January 2027, DDA and OAW should provide JLOSC with a status report. These updates would support JLOSC's future discussions regarding next steps, including whether legislative changes should be explored or whether the entity is ready for release from review.

- **Staff Recommendation 10: DDA and OAW status update in January 2027.** DDA will provide an update on all recommendations adopted by JLOSC in January 2027. OAW will provide an update that includes observations and assistance provided to DDA pertaining to adopted recommendations. JLOSC staff will provide the DDA and OAW with instructions on how to provide updates.



April 15, 2026

Joint Legislative Oversight & Sunset Committee  
Legislative Council, Division of Research  
411 Legislative Avenue  
Dover, DE 19901

Dear JLOSC Members and Division of Research Staff,

The Division of Public Health's Office of Animal Welfare (OAW) sincerely appreciates the work of the Joint Legislative Oversight and Sunset Committee (JLOSC) staff and the opportunity to participate in this focused review. We have reviewed the report findings and recommendations and offer the following comments on the recommendations that specifically involve the Office of Animal Welfare.

**Recommendation 1:** The General Assembly may wish to review and clarify statutory provisions governing domestic agricultural animal welfare enforcement to ensure that agency roles, enforcement authority, and responsibilities during seizure cases are clearly defined. DDA and OAW should convene discussions to clarify roles and evaluate whether statutory amendments are necessary to ensure agencies can effectively carry out their duties to enforce livestock at large and animal welfare cases. DDA and OAW will provide an update to JLOSC in January 2027.

**Agency response:** OAW looks forward to meeting with DDA to review current statutory language and determine if legislation is needed to better clarify roles and authority for effective enforcement of animal cruelty cases in Delaware.

**Recommendation 3:** DDA should coordinate with OAW to re-implement the CAD system and related radio equipment so that it is aligned with the system used by OAW and other statewide law-enforcement agencies, ensuring all parties always have access to the same information, including when DDA is outside its operating hours. CAD training is already incorporated into OAW's animal welfare officer training program. DDA should also implement similar safety communication protocols for responding to calls. DDA will provide the status of this effort to JLOSC in January 2027.

**Agency response:** OAW will work with DDA to re-establish use of the CAD system and radio by their investigator and provide the appropriate training.

**Recommendation 4:** DDA should develop a formal MOU with OAW establishing procedures for information sharing, case coordination, and communication during domestic agriculture animal welfare and livestock at large investigations and enforcement actions. DDA should provide progress and share MOUs developed between DDA and OAW with JLOSC in January 2027.

**Agency response:** OAW will coordinate with DDA to implement a formal MOU regarding sharing of resources and defining roles.

**Recommendation 7:** DDA and OAW should separately request compensation and classification reviews from the Delaware Department of Human Resources for investigator and key support roles. These reviews would help to determine whether current classification structures and pay ranges align with the complexity and legal requirements of animal welfare investigations, and whether these positions are compensated comparably to similar roles. The results of these reviews would then inform each agency's discussions with OMB and JFC during the budget process. DDA and OAW should provide updates to JLOSC in January 2027.

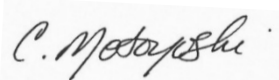
**Agency Response:** OAW agrees with this recommendation. We are currently in discussion with DHR about developing a new classification for investigators along with determining the appropriate pay scale to match the job demands.

**Recommendation 10: DDA and OAW status update in January 2027.** DDA will provide an update on all recommendations adopted by JLOSC in January 2027. OAW will provide an update that includes observations and assistance provided to DDA pertaining to adopted recommendations. JLOSC staff will provide the DDA and OAW with instructions on how to provide updates.

**Agency Response:** OAW looks forward to providing an update on observations and assistance provided to DDA in January 2027.

In summary, we respect the assessment by JLOSC and look forward to working with DDA to implement changes. Over the past ten years, OAW and DDA have worked together on many animal cruelty investigations with successful outcomes. As a result, numerous animal lives have been saved through this collaboration.

Respectfully submitted,



Christina Motoyoshi  
Executive Director

cc: Christen Linke Young, Cabinet Secretary, Department of Health and Social Services  
Steven Blessing, Director, Division of Public Health  
Tessa S. E. Quail, Deputy Director, Division of Public Health