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May 23, 2014

Mr. John Tracogna, Chief Executive Officer
The Toronto Zoo
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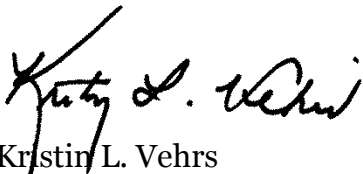
Dear Mr. Tracogna:

At the request of the Toronto Zoo, the Association of Zoos & Aquariums (AZA) is pleased to provide the attached document explaining our accreditation process, standards, and enforcement methods, and noting some of the similarities and differences between our program and that of the Global Federation of Sanctuaries (GFAS).

AZA is proud of our program, which is celebrating its 40th year, having issued our first accreditation credential in 1974. Much has changed over the years, but the underlying mission of the program has not—to promote great animal care in AZA-accredited institutions.

I hope you find this document informative and useful. Please do not hesitate to contact me or Denny Lewis, Vice President of Accreditation Programs, if you have any questions.

Sincerely,



Kristin L. Vehrs
Executive Director

cc: Robin Hale, Chief Operating Officer, Toronto Zoo
Jim Maddy, President & CEO, AZA
Jackie Ogden, PhD, Chair of the Board, AZA
Jim Anderson, Chair, AZA Accreditation Commission
Denny Lewis, Vice President, Accreditation Programs, AZA

Encl. [The Accrediting Process of the Association of Zoos & Aquariums]

The Accreditation Process of The Association of Zoos & Aquariums

Introduction

The Association of Zoos and Aquariums (AZA) was asked by the Toronto Zoo to prepare a document demonstrating that our “standards of [animal] care meet or exceed the standards of care adopted by the Global Federation of Animal Sanctuaries (GFAS)”, and to submit proof that we enforce our standards. In an effort to be responsive to the request from the Toronto Zoo, we reached out to GFAS and familiarized ourselves with their accreditation process and operations. We were impressed with what we learned. They have developed a thoughtful process to improve animal welfare at sanctuaries. AZA and GFAS share similar goals, but the missions and overall operations of sanctuaries and zoos/aquariums are very different. For AZA and GFAS, this has resulted in different considerations and accrediting processes. Regardless of these differences, we believe both are strong programs for the communities we serve.

On the surface, the most obvious differences between zoos and sanctuaries are:

- **Breeding:** managed breeding of animals for conservation purposes required at zoos/aquariums, versus no breeding permitted at most sanctuaries;
- **Mission:** the primary mission of zoos/aquariums is to exhibit wildlife and educate the public about conservation; for sanctuaries, it is to provide a final home for displaced wildlife;
- **Visitor/public presence:** zoos/aquariums have a steady and high level of attendance by members of the public; many sanctuaries don’t allow visitors, or limit that number by appointment;
- **Funding/revenue:** zoos/aquariums tend to have strong and numerous funding streams, whereas sanctuaries depend primarily on grants and donations, sources that are less predictable;
- **Staffing:** zoos/aquariums have a large number of degreed and experienced professional staff—the number of which depends on the size and nature of the collection—and in some cases, utilize a number of volunteers; sanctuaries most often have a small number of trained professional staff who oversee a large number of volunteers;
- **Goals for future growth:** zoos/aquariums are striving to grow (to increase efforts in conservation and education, research, and participation in ex-situ and in-situ conservation projects to save species); the ultimate goal of sanctuaries is to provide a home for displaced animals, and to help put into

place laws and regulations that will eventually result in a lessening need for sanctuaries to exist.

These core differences necessitate a differing approach to delivering and operating a successful accreditation program. AZA has the strongest and best accreditation program for zoological parks and aquariums in the United States. We are the originators of accreditation for zoological parks, and first began accrediting zoos in 1974. We have been researching and refining our program for 40 years, and we are recognized within the U.S. and many parts of the world as the “gold standard”. Among those prominent and internationally known institutions that rely on our accreditation process to be thorough, challenging, and meaningful, are Smithsonian’s National Zoological Park, the San Diego Zoo, the San Diego Wildlife Safari Park, the Wildlife Conservation Society’s Bronx Zoo, Disney’s Animal Kingdom, the Monterey Bay Aquarium, the Audubon Zoo in New Orleans, and the Shedd Aquarium in Chicago, just to name a few. Outside of the U.S., AZA’s accreditation program is recognized internationally as being the model to emulate, and a number of top quality institutions located outside of the U.S. have incorporated our standards as basic tenets in their day-to-day operations, and achieved AZA accreditation as a result. Among these are the Fundacion Temaiken in Argentina, Ocean Park in Hong Kong, Africam Safari Park in Mexico, and the Calgary Zoo and Vancouver Aquarium in Canada. In addition, at their request, we continue to assist other countries considering development of accreditation programs for their own zoological parks and aquariums, including Europe, Japan, and most recently, Malaysia.

Therefore, rather than submit an analysis of another organization’s process and standards—a process that is intended for a very different community beyond zoos and aquariums, and in which we are *not* experts—we intend to compare and contrast our different approaches, and speak of the strength of our own process, our own standards, our own organization, and the community we have served since AZA’s inception in 1924, and in which we *are* experts—the world of zoos and aquariums.

The History of AZA’s Accreditation Program

The American Association of Zoological Parks and Aquariums, (known currently as the Association of Zoos & Aquariums--AZA) was formed in 1924 for two primary reasons: (1) to bring zoos and aquariums together in a collective effort to save species; and (2) to work as a group to improve animal housing and care in zoos and aquariums throughout the U.S. Although much progress was made over subsequent years in advancing more uniformed animal husbandry practices within the zoo and aquarium community, it was clear to the AZA Board of Directors by the

late 1960s that a more effective means of encouraging greater strides in this area was called for. The concept of accreditation began to be discussed.

In 1971, AZA appointed a committee to research and develop standards of animal care for zoos and aquariums, based on commonly accepted best practices at the time. It was agreed that much variation in quality continued to exist throughout the zoological community, and that standards were needed as a clear target for which all institutions should strive to improve animal care and overall operations. A thorough and fair system of evaluation would also be needed as a means of measuring how successful—or not—institutions were in reaching those standards.

Accreditation was already a known and recognized tool used at that time primarily to measure the quality of educational institutions, hospital facilities, and manufacturing operations. Deciding this was the model to follow, the committee developed the original accreditation process to measure institutions against the initial core standards it had researched and identified. The first institution was accredited in 1974.

Quality Not Quantity. For the first ten years, accreditation was a voluntary process, and not required for membership in AZA. However, AZA's Board noticed that the overarching goal of the program—to raise standards of housing and care in zoos and aquariums across the nation—was not being achieved at the rate originally envisioned. Many institutions simply elected not to undergo the accreditation process. So in 1985, after much consideration of the realistic consequences, AZA made the bold decision to place the importance of *quality* ahead of *quantity*, and made accreditation a mandatory requirement for AZA membership. This decision saw the number of AZA members drop dramatically from approximately 350, to 87 by the end of 1985. The decision to make accreditation mandatory despite the expected loss of membership was easy *only* in the knowledge that it was *the right thing to do* for the animals entrusted to our care. AZA's willingness to take that bold step 30 years ago subsequently spurred a rise in animal husbandry and care among all serious zoological parks and aquariums as they began striving to reach the standards now *required* by AZA. And we believe just as strongly today that assuring high standards of animal management and husbandry is paramount to the overall welfare of living creatures, *and good conscience permits no higher priority*. Today, the number of AZA-accredited members stands at 224.

History and Overview of GFAS. According to its website, GFAS was founded in 2007 to serve the sanctuary community in a number of ways, including to help struggling sanctuaries recover, to assist with placement of animals in need, and to develop standards and a thorough process for evaluating facilities in light of those standards. The founding of GFAS is a truly positive thing for the world of

sanctuaries which had struggled for years to develop a strong accreditation program, without success. GFAS's program has two levels: *accreditation* for those sanctuaries that are judged as meeting GFAS standards, and *verification* for those sanctuaries that meet *only* the standards related to animal welfare. After several years of preparation, GFAS issued its first credentials in 2012. As of today, GFAS has issued 44 accreditations and 80 verifications in the U.S., and outside the U.S. 5 accreditations and 24 verifications. Unlike AZA, GFAS is not a membership-based organization. The sanctuaries do not pay dues or participate in professional development activities or networking gatherings organized by GFAS. GFAS is funded by the support of foundations and public charities, as well as individual donors, and is primarily focused on credentialing, helping to place animals, and financial assistance. Because the sanctuary community generally struggles to balance the high expense of providing good animal care versus the relative unpredictability of fundraising and donations (typically a key source of income), GFAS provides funding (via grants) for sanctuaries wishing to undergo its accreditation program. To help GFAS keep its own expenses low, it retains a small staff and utilizes volunteers and interns.

Overview of AZA. In the zoo and aquarium community, where sources of revenue are typically more numerous and reliable, membership in an association of similar institutions is critical to ensuring continued professional development, and offers unlimited networking opportunities to collaborate on solving animal health and welfare issues. It also promotes collaborative efforts to save species and their habitats, to expand collective knowledge, to move the profession and its practices always forward, to be represented in State and Federal issues affecting animals, and to grow and improve. As an organization, AZA has a staff of 31 and, in addition to its focus on accreditation, is heavily involved in:

- Providing professional development: over the years, AZA's many training opportunities have included such offerings as webinars and on-site training, work sessions at conferences, week-long on-site courses, and a degree program offered through a nationally accredited university;
- Saving species and habitat restoration: through approximately 600 managed programs, including 350 Species Survival Plans, through special focus efforts in which especially vulnerable species are identified for additional funding and support, through collaborative field work, financial donations and on-the-ground staff (note: collectively, AZA-accredited institutions provide in excess of \$160 million in contributions of staff and funding for in-situ conservation each year), and through grants provided by the AZA Conservation Endowment Fund;
- Conservation education: at the core of every AZA-accredited zoo and aquarium is the public engagement in significant conservation education

programs. Over the past 10 years, AZA-accredited zoos and aquariums have trained more than 400,000 teachers with award-winning, proven science curricula. In addition, AZA organizations educate more than 12 million students every year in the classroom or in the field;

- Legislation and government affairs representation on issues that affect animal care and welfare, including getting the message out that “exotic animals do not make good pets”—a position shared by both AZA and GFAS;
- The expert work and influence of AZA’s many committees, among them the Animal Health Committee, the Animal Welfare Committee, the Aquarium Affairs Committee, the Conservation Education Committee, the Safety Committee, and the Wildlife Conservation and Management Committee, to name a few.

Goal of Accreditation

The primary goal of any accreditation program is to spur improvement in the operation and facilities of those seeking accreditation as they strive to reach established standards. A secondary goal is serving as a public assurance that the recognized standards of a professional community are being met and maintained. This further aids the credentialed organization in seeking grants and funding, as well as permitting, and supporting community outreach.

Both AZA’s and GFAS’s accreditation programs share these same goals. The communities we serve—zoological parks/aquariums (AZA), and sanctuaries (GFAS)—have distinctly different missions and visions, and the two accreditation programs have differing approaches as a result. Because our programs and the communities we serve are very different, the two processes do not lend themselves to a point-by-point comparison, nor do we believe we should attempt to interpret their mission or standards. What we *do* believe is that, in the end, both programs produce similar results within our respective communities—better operations, better facilities, better places for wildlife. Both are good programs for the fields they represent. GFAS would not attempt, nor be qualified, to accredit a zoo under its sanctuary-based accreditation program; and AZA would not attempt, nor would it be qualified, to accredit a sanctuary under its zoo/aquarium accreditation program.

The stated goals of AZA’s accreditation program include:

- The establishment of standards and the continuous assessment of those standards (including confirmation of each institution’s incorporation and maintenance of those standards);
- Promoting the development of superior facilities
- Publication of professional information highlighting current practices,

- documenting trends, and raising professional expectations; and
- Helping to encourage and mentor non-accredited institutions to aspire to accreditation status—thereby improving their facilities and, ultimately, the quality of life for the animals housed there

GFAS's goals are quite similar, and are summed up by their mission to “help sanctuaries help animals”. This includes the creation of standards, and the validation of sanctuaries that are meeting these standards; to promote collaboration and mentoring; and to lobby for an end to the practices that result in displaced animals.

Staying Current

AZA's accrediting process is itself a living entity that changes and improves as the science of zoology and animal care makes new and exciting discoveries. New standards are introduced as new information comes to light, and existing standards are revised as research and new discoveries dictate. In the last ten years, AZA has introduced 41 new standards, and 110 revisions have been made to existing standards.

Standards are written and/or revised by the sitting Accreditation Commission, consisting of 15 experts appointed by the AZA Board of Directors to oversee AZA's accreditation process. These are leaders in the profession with many years of training and experience in zoo/aquarium operations, animal management and husbandry, and veterinary medicine (see “Accreditation Commission”, page 13, for additional information about the Accreditation Commission). Anyone can suggest adding a new standard or revising an existing one, including the public. The suggestion is received and carefully evaluated in light of current scientific knowledge, research and husbandry, commonly accepted best practice, and overall scope of AZA's accreditation program. Most often, suggestions for standards come from one or more of AZA's 24 committees, (such as the Animal Welfare Committee, the Animal Health Committee, etc.) and AZA's Taxon Advisory Groups (TAGs). In addition to that, the members of the Accreditation Commission continuously review the standards and make suggestions for updates and revisions. Once a new standard or a revision is approved by the Accreditation Commission, it is then reviewed in final form by the AZA Board of Directors and must be approved by that body before becoming official.

As a result of this updating process, AZA's standards are issued on an annual basis each Fall, and all AZA-accredited institutions are responsible for ensuring that new and/or revisions to standards are incorporated when issued. AZA identifies new standards by listing changes at the front of the annual booklet “Standards and

Related Policies” (available for download in PDF format at: <https://www.aza.org/uploadedFiles/Accreditation/AZA-Accreditation-Standards.pdf>).

An example of the continuous enhancement of AZA standards is the new standard just approved for the 2015 edition that requires staff and/or volunteers to receive proper training before handling education animals. In addition to that, there are currently five additional changes (including two more new standards) pending for the consideration of the AZA Board.

Along with the continuous review and revision of the standards, the AZA Accreditation Commission convenes for several consecutive days once every five years for the sole purpose of reviewing the existing standards, policies, and process *as a whole*, to ensure continuity, clarity, and consistency with the latest research and science in all areas covered by the accreditation process.

Performance Standards

Primarily, AZA standards are *performance* standards (i.e., measuring the level of achievement considered acceptable to fulfill a performance characteristic, and choice in method for meeting the goal). This differs from *engineering* standards, where exact and precisely measured steps are required to fulfill an engineering characteristic, with little or no variation in method for meeting the goal.

Many sanctuaries house a single type (taxon) of animal, and while there are some multi-taxa sanctuaries, the number of species at those facilities is usually significantly lower than what you would find at a typical zoological park or aquarium. For example, of the 124 sanctuaries either accredited or verified by GFAS at present, 113 are focused on one or two key taxa. In the world of zoos and aquariums, where so many variables exist, the use of performance standards versus engineering standards allows greater flexibility in applying each standard to the great variety of species typically found in a modern zoo or aquarium. Even the smallest AZA-accredited zoos typically average close to 100 species, each with differing needs. A single performance standard can be applied to all—within each institution’s specific parameters and challenges, and according to the needs of each species.

In contrast, because most sanctuaries focus on one or two key taxa, GFAS includes many engineering-based standards and issues a separate set of standards for each species. But in zoological parks, the variety of species is so great, that it would be impractical to attempt this same approach. Therefore, AZA uses a combination approach to achieve the same result:

- **the general accreditation standards**
- **the Animal Care Manuals:** ACMs are science-based engineering style recommendations compiled by TAGs for maintaining a variety of taxa, and include guidelines for areas such as habitat, holding, nutrition, enrichment, breeding, socialization, and psychological welfare, among other things; see “Animal Care Manuals & Related Policies”, page 8 below, for more information
- **the official AZA policies:** these are policies relating to and/or referenced within the standards themselves (for example, accreditation standards require that AZA’s Acquisition & Disposition Policy be incorporated—at minimum—into every institution’s A&D Policy)

We strongly believe that *all* of our standards, ACMs, and related policies are ultimately aimed at animal welfare. Obvious in this are those covered under the headings of Animal Care, Welfare, & Management; Veterinary Care; Conservation; Research; Staff; Physical Facilities, and Safety/Security. Perhaps less obvious are those contained under the headings of Finance, Support Organization, Governing Authority, and Education/Interpretation, yet we strongly believe that these, too, are important to animal welfare as they are an integral part of the overall whole and failure in one of these areas could, ultimately, lead to a shortage, oversight, or malfunction that could trickle down and have an adverse effect on animal welfare.

Animal Care Manuals & Related Policies

As explained above, AZA’s standards are performance based—meaning they are written in a way that allows flexibility in how an institution goes about meeting a standard. Unlike GFAS, where engineering specifications are often contained in the standard itself, AZA’s performance based standards state the goals, and rely on our Animal Care Manuals (ACMs) and our related policies for the specifics.

ACMs. One of the first standards contained in the section on Animal Care, Welfare, & Management requires institutions to tailor their animal care programs, protocols, and exhibits in accordance with the ACM for that species (1.2.1). ACMs are detailed manuals created by experts within the Taxon Advisory Group (TAG) for each species. The ACMs contain recommendations for every aspect of caring for a species, including specifications for ambient environment (holding, exhibit), habitat design, transport, social environment, nutrition, enrichment, veterinary care, behavioral management, psychological welfare, reproduction, and more. When inspecting an institution, should an inspection team have a concern about any aspect of an animal’s environment and care, the appropriate ACM can be consulted to document the need, and to direct action moving forward. ACMs are monitored

by the authoring TAG so that they remain up-to-date based on current scientific information. In cases where an ACM is still in progress and not fully available, consultation with the TAG itself is utilized.

Related Policies. Incorporated into the accreditation process in a similar way are AZA's related policies. These include such documents as Animal Contact With The General Public, AZA Program Animal Policy, Apes in Media and Commercial Performances, AZA Acquisition & Disposition Policy, and the AZA Code of Professional Ethics, to name a few. AZA's process requires all institutions to sign a document agreeing to abide by all AZA policies as a condition of accreditation, and often these policies are referred to in the standards themselves. Should an institution fail to adhere to any AZA policies, the matter would result in a special inspection, or would be referred to AZA's other oversight committee—the Ethics Board. In either case, following a thorough review, the situation would be addressed in a number of ways depending upon the conclusion reached: (1) appropriate corrective measures taken by the institution and verified by AZA, (2) loss of AZA membership and accreditation, or (3) dismissal of the case if determined untrue, or for lack of evidence.

Differences In Scope

As already noted, there are basic differences in the mission and scope of modern zoos/aquariums, and a typical sanctuary; the most obvious of those being the issue of exhibition, a continuous public presence, and breeding for conservation purposes. AZA's accreditation program is designed to include things specific to the operations of zoos and aquariums. The fact that GFAS's accreditation program does not cover these things would be expected, and does not lessen the value of that program, which is not designed to accredit zoos and aquariums.

Some examples of things that AZA's accreditation program covers that the GFAS program does not, include:

- guidelines for use of education program animals
- temporary exhibits
- the need for an Institutional Collection Plan (ICP) to ensure that the many species housed at the institution represent the mission of the institution
- conservation action, including alliances, participation through staff and/or resources, participation in recovery projects of endangered and threatened species both nationally and internationally, conservation education for public awareness, green practices, measurement of conservation impact, and more
- an education program that includes goals and objectives, and collaboration with museums, institutions of higher learning, and other conservation organizations

- an education program that stresses conservation and how visitors can help
- an educator with professional training on staff
- regular evaluation of publications, and graphics
- requiring that only the trained zoological professionals make decisions affecting the animals
- requiring that lines of communication between the institution and its governing authority be open and clear
- requiring that accreditation standards be reviewed by leadership annually
- requiring that volunteers be regularly trained and evaluated
- requiring a formal agreement between the institution and its support organization (if an SO exists)
- requiring that the institution have insurance that covers potential injury to visitors, staff, and volunteers
- requiring sufficient funding and a written plan in place for preventative maintenance, capital improvements, and major repairs/renovations
- requiring that alarms be in place for security, life support, and other safety alerts, and that they be checked regularly
- safety and maintenance issues regarding public spaces and walkways
- TB testing for staff
- an automated emergency defibrillator on grounds, and staff training
- free-ranging animals on grounds
- safety in wet environments
- exit and emergency signage
- public barriers
- requirement of a written risk management plan, including risk assessments of dangerous animals
- management of venomous animals
- protocols for handling attacks by animals on staff or visitors
- requirement for 24-hour security personnel and/or surveillance systems
- training of security personnel
- requirements for dive safety
- visitor accessibility (handicapped)
- visitor amenities, including food, drink, and restrooms
- common conveniences, including parking, gift shops, maps, directional signage, etc.
- overall aesthetics

Some of the things we share include:

- general requirements for modern enclosure design and complexity of environment
- securing animal areas to prevent egress (exhibits, holding areas, night houses, etc.)
- appropriate groupings size and socialization

- size of overall living space
- protection from detrimental environmental conditions (weather, sunlight/heat, cold, ventilation, lighting, etc.)
- reporting and addressing welfare concerns
- water quality
- animal transport
- enrichment
- nutrition
- quarantine
- staff training on zoonotic diseases
- staff training in handling toxic materials and fire extinguishers
- requirements for perimeter fencing
- record-keeping
- pest control
- preventative medicine program
- animal food preparation and storage
- oversight of browse materials
- adequate number of trained staff to care for the animals
- communication between the CEO/Director and staff be open and clear
- written emergency procedures and drills
- good housekeeping (clutter, drainage, extension cords, etc.)
- alarms in place for fire, and that they be checked regularly
- safe and organized service areas

Accrediting Process

The Importance of Confidentiality In An Accrediting Process. An accrediting body must be capable of acting without bias, and must be trusted to take appropriate action whenever standards are not being met. To do otherwise eliminates the credential's credibility, and defeats the purpose of the process itself (see "Enforcement", page 14). To thoroughly investigate an organization, a degree of confidentiality must be established between the accrediting body and the organization being evaluated. This is necessary so as to gain access to private and protected information regarding financial assets, debts, salaries, and other legally protected data. It is also important to establish a "safe" environment in which discussion can flow freely when conducting interviews with employees, volunteers, former staff, and/or members of the public who wish to share information—positive or negative—with the accrediting body. By extending confidentiality, an accrediting body can more accurately get at the truth of a matter so that a correct and informed decision can be made, and appropriate action taken. AZA holds a responsibility to the public, and to every institution that undergoes AZA accreditation, to maintain

the integrity of the process. The Accreditation Commission is tasked with maintaining that trust, and with fairly evaluating each situation before rendering a decision. This is why a body of 15 consider the outcome—to assure that oversight is strong and integrity upheld.

Inspection Teams. In a typical year, approximately 160 inspectors will participate in accreditation reviews. Inspectors are voluntary and must meet specific criteria to qualify for service. In order to qualify an inspector must have the support of his or her institution to participate, and must have a minimum of 5 years of experience at a top level within the field (zoo/aquarium operations and administration; animal management and husbandry; and veterinary medicine). Inspectors must also be active in the profession and employed at (or retired from) an AZA-accredited facility. They must also have taken sufficient training offered by AZA. Inspection team chairs receive additional training.

The average size of a typical inspection team is three individuals with expertise in the following areas: zoo/aquarium operations, animal management and husbandry, and veterinary medicine. For especially large institutions, the addition of a fourth inspector is required, and for institutions holding elephants, a fourth inspector who is recognized as an elephant expert is added automatically. The team spends 2 to 5 days on-site at the institution (depending on the size of the institution). During that time they inspect all exhibits and animal holding areas, veterinary services and facilities, buildings and service areas, review records, interview staff and members of the governing authority, and all public areas and amenities. At night, the team discusses issues noted and compiles a list of concerns to be presented to the institution at the conclusion of the inspection. After the inspection is over, the team spends weeks preparing the official report, which is then submitted directly to AZA.

Overall Process. AZA reviews an average of 55 cases a year. The number of man-hours given each case does vary, depending on the complexity of the institution and the concerns that may be identified. An average case is estimated as receiving approximately 100 total man-hours to evaluate, including time spent by inspectors to prepare, inspect, and compose the report; the Accreditation Commission's time to study, evaluate, and interview each case, and staff time to process, prepare, and coordinate each case and its materials.

Upon receiving the list of concerns at the conclusion of the inspection, each institution is required to address the concerns and to submit a report with hard documentation showing that this has been done. The Accreditation Commission reviews this report and then interviews the senior management of the institution in person before making a decision as to whether accreditation can be granted, or not. A key principal in making this decision is how the institution appears *at the time of*

the inspection and review. While future plans are important, the Accreditation Commission must believe the institution is meeting standards at that time for accreditation to be granted. If the Commission believes that the institution is close, and can meet standards within one year, it may table the institution and allow it to be reconsidered under the same application at the end of one year and after a follow-up inspection occurs. If the Commission believes the institution does not meet standards and cannot do so within one year, it is denied and must wait at least one year before submitting a new application. Once accreditation is granted, it can be rescinded by the Accreditation Commission at any time if standards are not maintained. The Commission may conduct a special inspection if it believes it has reasonable evidence that standards are not being met (see “Enforcement/Special Inspections”, page 14).

Accreditation Commission: The Accreditation Commission, itself, consists of 12 voting Commissioners, and 3 non-voting Commission Advisors. These individuals serve two consecutive 3-year terms, and are appointed by the incoming Chair of the AZA Board of Directors as terms expire. These are senior leaders in their field, considered as experts by the profession. At present, the Commission has approximately *430 years* of collective experience among them, which they use in overseeing AZA’s accreditation process. Although the majority of decisions are unanimous, of the twelve voting, at least 8 must agree for a motion to pass. This assures that, when decisions are made, there is no single individual who drives the process. All voices are heard, all issues are weighed carefully, and decisions are based on policy, consistency, and the state of the institution *at the time of inspection and review.*

Tabling. The Commission may table an institution’s application if it determines that certain conditions must be met or additional information submitted before the institution can be considered as meeting accreditation standards. In addition, the Commission must believe that the institution is capable of meeting those standards within one year, and a follow-up inspection is required at the end of that year. When an *accredited* institution is tabled, it remains accredited during the period of tabling, although tabling indicates that concerns exist. At the end of the year, and after a follow-up inspection has occurred, the institution returns for a second hearing with the Commission. At that time the Commission must act to accredit or deny (continuing to table is *not* an option). If granted accreditation, the year of tabling is deducted from the institution’s subsequent accreditation cycle to ensure that an inspection occurs every five years. On average, the Commission tables 3 institutions a year (there have been 30 tablings in the last ten years, 4 of which were denied at the end of the year of tabling).

Enforcement

Any accreditation program, no matter the field, requires a strong enforcement policy, including being certain that standards are being met at the time accreditation is granted. If we fail to enforce our standards, they become—in effect—meaningless. At present, AZA has 224 accredited institutions. However, not every institution that applies for accreditation achieves it, nor is every institution that achieves it able to keep it. Since AZA first began accrediting institutions in 1974, there have been 62 denials issued. Only 12 of those were later successfully accredited.

Once accredited, institutions must continue to maintain standards throughout the period of accreditation and, if they do not, punitive action must occur. Under AZA's program, there are a number of methods used to achieve this.

Special Inspections. Special inspections are required whenever AZA receives evidence that standards are not being met. The purpose of the inspection is to determine whether this is true and, if so, to affect change or to remove accreditation. In the last ten years, 12 special inspections have taken place.

Once AZA has determined that sufficient evidence exists to justify an investigation, the institution is contacted and informed that a special inspection is being scheduled. We do not share the reasons for the inspection with the institution so as to prevent a concern from being rectified before our information can be verified by inspectors. In one case that occurred within the last several years, upon being informed that a special inspection was being scheduled, the institution actually *resigned* its accreditation rather than undergo the inspection. AZA believes this may have been done in the hope that AZA might “reconsider” performing the inspection rather than lose a member. But our procedures are strong and we are consistent in following them. We would prefer to lose a member than to compromise our standards and our process of enforcing them. We “accepted” the resignation of that institution.

But not all special inspections result in accreditation being rescinded. Sometimes these inspections show no evidence of compromised standards. And other times they serve as a “wake up” call and the issues are corrected quickly and thoroughly. In the case of the latter, the Commission continues to monitor the institution via progress reports until the institution's next regularly scheduled accreditation review occurs (see “Progress Reports”, page 16).

Denials. In the last ten years there have been 26 institutions denied—an average of 2 a year. Many were denied during the standard accreditation process. Others

received accreditation and later had that accreditation rescinded for failure to maintain AZA standards. In addition to the example above in which the institution surrendered its accreditation to avoid a special inspection, following are five more examples of cases in the last ten years where accreditation was denied:

- Case 1: the institution failed to maintain animal care, staffing, and facility standards (specifically, 1.5.1, 1.5.7, 1.5.8, 7.3, 10.1.2., 10.3.3.). When granted accreditation, these standards were being met. Over several years and after a change of leadership, things deteriorated resulting in a special inspection and the loss of AZA accreditation.
- Case 2: the institution failed to maintain veterinary, and facility standards (specifically 2.7.1, 2.7.3, 10.1.2). When granted accreditation, these standards were being met. As the institution desired to grow, it began to build new exhibits at the expense of maintaining the older facilities. As a result, the older facilities began to deteriorate. Additionally, the institution began a practice that involved a potential for cross contamination. These issues resulted in a special inspection and the loss of AZA accreditation.
- Case 3: the institution failed to maintain governing authority, ICP, and SSP standards (specifically, 6.1, 6.2, 6.3, 6.4, 6.5, resulting also in 1.3.2, and 3.3.1). When granted accreditation, the governing authority signed the application agreeing to abide by AZA policies and accreditation standards. Later, it used its authority to override the decisions and goals of the zoo professionals regarding animals in the collection. This action resulted in a deep review of the situation and ultimately loss of AZA accreditation.
- Case 4: the institution failed to maintain governing authority, staffing, and risk management standards (specifically 6.3, 7.1, 7.2, 7.3, 7.4, 7.6, 11.4.1). When granted accreditation the institution was meeting standards in these areas. As time went by, things deteriorated within the leadership ranks, and lack of internal oversight permitted things to continue unchecked. These issues resulted in a special inspection and the loss of AZA accreditation.
- Case 5: the institution failed to maintain animal care, governing authority, finance and facility standards (primarily, 1.5.1, 1.5.2, 7.3, 9.1, 10.1.2). When granted accreditation the institution was meeting standards in these areas. Over time, issues involving finances led to maintenance and staffing concerns, and to a drop in habitat quality. These issues resulted in a special inspection and the loss of AZA accreditation.

[NOTE: AZA accreditation standards and other accreditation materials are available for download from our website, and can be found at <https://www.aza.org/accred-materials/>.]

Progress Reports. Our process includes requiring progress reports from institutions that are accredited, but have a project or projects ongoing at the time accreditation is granted that relate to accreditation standards (such as renovating an existing exhibit, demolishing and replacing a section of the institution, enhancing a protocol, etc.). In these cases, each institution is required to provide periodic progress reports to the Commission, including documentation. These reports must continue until the Commission is satisfied that the institution has completed the project and continues to meet accreditation standards. On average, the Commission reviews 30 progress reports per year (a total of 315 progress reports were reviewed over the last 10 years). The Commission also requires progress reports from tabled institutions.

Comments/Concerns. According to actual ticket sales and other measures, it is estimated that approximately 500,000 individuals visit AZA-accredited institutions *daily*—a watchful eye that most sanctuaries don't have. That very public presence provides us with another enforcement tool in the form of comments and/or concerns we receive from guests at our institutions. AZA receives many inquiries, approximately 20 per year of which are concerns we investigate. Upon receipt, we immediately contact the institution and request information about the case, including photographs, videos, and any other documentation needed to determine the situation and to ensure animal welfare. This information is carefully evaluated and a determination is made as to whether the case is resolved, or a deeper investigation is warranted (see "Special Inspections", page 14). If it appears that the issue is resolved, a brief report on the matter is placed into the institution's file with all materials received from the institution to be checked again upon the next regular accreditation inspection. Should additional complaints be received, a special inspection would be required. We consider the public a partner in this regard, and we appreciate and encourage them to contact us with any questions they may have.

In this same vein, we rely on our colleagues within the profession to do the same if they have any concerns after having visited another AZA-accredited institution.

Special Accident Reports. Should an accident occur at an AZA-accredited institution involving serious injury or affecting the welfare of a visitor, staff, or animal, a written report and documentation must be submitted to the Accreditation Commission within thirty days explaining what happened and noting what actions are being taken by the institution as a result. The Commission will determine if a special inspection or other action is necessary and will notify the institution once a decision has been made.

Mentoring. In some cases, the Commission may believe an institution can benefit from direct counseling to help it more fully understand and meet accreditation

standards. In those cases, the Commission may assign a mentor to work with the institution as it strives to address any issues identified. This holds true for AZA-accredited and non-accredited institutions alike. Mentors are trained inspectors who have been involved in accreditation at particularly high levels, often individuals who have served on the Accreditation Commission in the past. Those individuals work closely with the institution and the Accreditation Commission to ensure compliance is achieved.

In Conclusion

The goal of AZA's accreditation program is, in the end, the improvement of an institution's facilities, protocols, and level of care provided its collection. To that end, AZA continues to work with institutions that are denied or lose accreditation to help them address the issues and continue moving forward. Mentoring is also available to institutions that are hoping to apply for accreditation one day in the future, but are many years away from achieving that goal. Each step in working towards accreditation means better animal care, which is the reason AZA began its accreditation program 40 years ago.

We believe that's the same reason GFAS began its program in 2012—to raise the level of quality and care at sanctuaries, document that, and provide a goal that lesser sanctuaries can aim for. Noble objectives, both, and we applaud and support their having done so.

We also applaud the Toronto Zoo Board of Directors for looking carefully at the accreditors within its own profession. No matter what the field, whether it be sanctuaries, zoos and aquariums, hospitals, educational institutions, or any other operation, an accreditation credential is only as good as the process and organization behind it. Accreditation programs can vary greatly by organization, from extremely thorough and rigorous, to a simple payment of fees and a cursory review. As the primary accrediting body for zoos and aquariums in the United States, AZA believes in its well-established, respected accreditation process. AZA is committed to continuing to strengthen and improve that program, both in process and substance, in accordance with advances in zoology and the aquatic sciences, and within the accrediting world. At present, we are exploring ways to enhance our inspector training programs and materials, and are implementing a more formal mentoring program designed to help struggling non-accredited institutions improve their operations. In the meantime, we believe in the strength of our program, its standards, and its methodologies of fair measurement and enforcement, and the consistency of its application.

A good accreditation program is never finished evolving, nor should it be. By continuously raising and enforcing professional standards, leaders in the AZA zoo and aquarium community can promote continuous improvement in providing humane, healthy, and stimulating environments for all animals in our care. And through our accreditation process, we can likewise assure that AZA zoos and aquariums employ modern zoological practices as basic tenets. We do this because animal care and welfare, and the quality of animal life in our accredited-institutions, is our top priority. This passionate belief is what drove the development of AZA's accreditation program 40 years ago, and remains our guiding focus today.