

**Model Policies and Procedures  
For the Administration and Recordkeeping of Legend Drugs  
Used by  
Animal Control Agencies and Humane Societies**

Date Submitted: _____	OFFICE USE ONLY	Date received: _____
Name & Title of Registrant: _____		
Name of Agency: _____		
Address: _____ _____		
Telephone Number: _____		Fax Number: _____
Contact Person: _____		

**I PURPOSE:**

To establish policies and procedures pertaining to the acquisition, administration, recordkeeping and security of sodium pentobarbital (controlled substance) and approved legend drugs in compliance with the state and federal Controlled Substances Acts and state rules. **WAC 246-887-060 & WAC 246-886-030**

**II General Policy:**

- A.** Each agency or society must maintain a current registration with the Washington State Board of Pharmacy (Board) to purchase, possess, or administer sodium pentobarbital, and approved legend drugs. **RCW 69.50.310**
  
- B. Registrant:** Each agency or society shall designate an individual as the registrant.
  - The registrant shall be responsible for maintaining all records and submitting all reports required by federal or state laws and rules.
  - The registrant shall be responsible for the ordering, possession, safe storage and utilization of the sodium pentobarbital and approved legend drugs.  
**WAC 246-887-050 & 246-886-060**
  - Each agency or society shall promptly notify the Board in writing of any individuals who have qualified to administer sodium pentobarbital and/or approved legend drugs or of any amendments or deletions to the policies and procedures.  
**WAC 246-887-060 & 246-886-070**
  
- C.** Only those agents and employees who have completed a Board-approved euthanasia program and have demonstrated adequate knowledge of the potential hazards and proper techniques may possess or administer sodium pentobarbital and/or legend drugs used for sedation.  
**WAC 246-886-040 & RCW 69.50.310**

### III Security Policy:

- A. All controlled substances will be in a substantially constructed locking cabinet. Access shall be limited to persons who have completed the requirements to administer such drugs.  
**WAC 246-887-200(4)**
- B. In the event of theft, loss or diversion of the sodium pentobarbital or other legend drugs, the agency or society shall notify local law enforcement. The theft, loss or diversion of a controlled substance shall be reported to the DEA and to the Board of Pharmacy by submitting a written report along with a completed DEA-106 form. **WAC 246-887-020(c)**
- C. Approved legend drugs for use by registered humane societies and animal control agencies for the sole purpose of sedating animals prior to euthanasia, when necessary, and for use in chemical capture programs.
  - (a) Acetylpromazine (acepromazine)
  - (b) Xylazine**WAC 246-886-030**

### IV Record Keeping:

- A. A bound log book with consecutively numbered pages shall be used to record the receipt, use, and disposition of the sodium pentobarbital and approved legend drugs. **WAC 246-886-080**  
*Entries will be recorded in ink and records will be retained for two years.*  
**WAC 246-869-100 & CFR Title 21.1304.04(a)**
- B. Each agency or society will be responsible for designing a log sheet. To ensure the log book contains sufficient detail to allow an audit to be performed, *the log sheet will contain the following information:* **WAC246-886-080**  
*Date; animal breed; animal's estimated age; identification number (microchip, license or internal intake/disposition code); animal's color, and weight; route of administration; dose name and strength of drug administered; names and initials of all involved in the euthanasia; notation as to whether the animal was conscious or not.*
- C. Contaminated or out-of-date drugs shall be properly destroyed through a reverse distributor. Record of such destructions shall be made in the log book and shall be signed and dated by the registrant and another staff member.
- D. All invoices, record books, disposition records, and other records pertaining to the sodium pentobarbital and approved legend drugs shall be maintained in a readily retrievable manner and kept for no less than two years.
- E. A physical inventory of the sodium pentobarbital and approved legend drugs shall be performed and reconciled with the log book no less frequently than every six months.
- F. Discrepancies in the actual inventory shall be documented in the log book and reported immediately to the supervisor/registrant who shall investigate the discrepancy. Any discrepancy which has not been corrected within seven days shall be reported to the Board.  
**WAC 246-886-080**
- G. All records shall be made available for inspection by the state board of pharmacy or any officer of the law who is authorized to enforce this chapter.

**Note:** The following are standards outlining the appropriate procedures for humane use of sodium pentobarbital and other drugs for animal euthanasia. These guidelines are established in texts approved for use in Board-approved training programs. (This is not meant to serve as or replace required training.)

**WAC 246-886-040 Board approved text:  
Humane Society of US Euthanasia Training Manual  
2009 American Humane Association Euthanasia by Injection Training Guide**

## **V Sedation and Euthanasia – the act of inducing a painless death.**

- A. Pre-euthanasia Drugs – Approved Legend Drugs (or by order of licensed veterinarian)
- B. Sodium Pentobarbital (390mg/ml) Injections Standard Dosing — 1 ml sodium pentobarbital per 10 lbs of body weight. A minimum of 1 ml should be used for any animal under 10 lbs.
  - Intravenous – into the vein.
    - (a) Animal may be conscious
    - (b) Two handlers
  - Intraperitoneal – into the abdomen
    - (a) 3 ml per 10 lbs body weight – minimum dose of 1ml for animals less than 3 lbs.
    - (b) Animal may be conscious
    - (c) Method used for very young or small animals
  - Intracardiac – into a heart chamber
    - (a) Animal must be unconscious –
    - (b) Ensure the animal is unconscious
      1. Second Step – gently touch the cornea of the eye to assess any reflexive action.
      2. Third Step – firmly pinch the skin (or web) between the toes of the upper rear paw and watch for any reflexive reaction.

**Note:** Never use intramuscular or subcutaneous injections when administering sodium pentobarbital because the pH of the drug may cause severe pain.

- C. Final Signs – examination of the animal and verification of death.
  - First Sign – Lack of respiration. Check for the presence of a heartbeat using a stethoscope.
  - Second Sign – Lack of eye reflexes. Gently touch the cornea of the eye to assess any reflexive action.
  - Third Sign – Lack of heartbeat - Intracardiac Injection. (only when the other 2 steps have verified unconsciousness)
  - Fourth Sign - Rigor mortis can be observed with one half hour of the injection. Set the animal aside for at least 30 minutes after it has been declared dead before disposing of the body.

**RETURN COMPLETED DOCUMENTS TO:**  
DEPT OF HEALTH – BOARD OF PHARMACY  
PO BOX 47863  
OLYMPIA WA 98504-7863