Commission SBAR Communication

Agenda Item/Title: Revisit WA Dept. of Fish & Wildlife Chemical Capture Program Policies and Procedures for Approval

Date SBAR Communication Prepared: October 18, 2019

Reviewer: Doreen Beebe

Link to Action Plan:

☐ Action  ☐ Information  ☐ Follow-up  ☐ Report only

Situation: The Commission reviewed the proposed policies and procedures submitted by WDFW Chemical Capture program on September 13 (previous meeting). The Commission denied the P&P due to collective bargaining language that would supersede the policies and procedures if found to be in conflict with or modified by a bargaining unit agreement.

Per WDFW, language removed from the Chemical Capture Program Policies and Procedures as well as other changes.

Background: (Briefly state the pertinent history):

Policy Updates;
Definitions:
Controlled Substances:
• Definition adopted from chapter 69.50 RCW to read “…but does not included hemp or industrial help as defined in RCW 15.140.020.”
• Adding “Pharmacy Quality Assurance Commission” to DEA as authority to control the use of narcotics and other dangerous drugs that are +listed in the Controlled Substance Act.
• Removed drug list from definition and added Pharmacy Commission rules on approved legend and controlled drugs (under section 3 in procedures).
• Removed drug not included on Pharmacy Commission approved list. These drugs were specific to use by the veterinary under the practitioner’s scope of practice.

Prescription Drugs:
• Updated definition to be consistent with RCW 69.41.010 to include not just drugs that are regulated by the FDA but to include “state law or the Pharmacy Commission.”
• Adding the Pharmacy Commission shall “designated in rule” so it is unnecessary to list in the policies and procedures.

4. Employee Training
• Added “applicable state and federal laws, rules and regulation.”

Procedures
3. Legend and Controlled Drug Storage in WDFW Offices and the Field
- References to WAC must be updated upon adoption of new chapter
- removed reference to drugs not on approved list under the authority of the veterinarian scope of practice. (under subsection b).

No other changes.

DOH XXX-XXX
**Assessment:** P&P consistent with rules and previously approved P&Ps. Dr. Mansfield will join by webinar.

**Recommendation:** Approve policies and procedures with or without revisions.

**Follow-up Action:** Dr. Mansfield on behalf of the Department of Fish & Wildlife

Email dialog attached after final P&P confirming support to remove collective bargaining language.
POLICY XXXX

Federal and state laws allow the administration of certain drugs under specified conditions for wildlife research and management purposes, including capture, relocation, examination, treatment, and other legitimate uses. This policy applies whenever Department of Fish and Wildlife personnel participate in the chemical immobilization of terrestrial wildlife and marine mammals.

DEFINITIONS:

**Controlled Substances:** Drugs, substances, or immediate precursors included in Schedules I through V as set forth in federal or state laws and rules because of their potential for abuse, but does not include hemp or industrial hemp as defined in RCW 15.140.020. Schedule I drugs have the highest abuse potential and no accepted medical use; Schedule V drugs have the least abuse potential. The Pharmacy Quality Assurance Commission (Pharmacy Commission), and the federal Drug Enforcement Administration (DEA) control the use of narcotics and other dangerous drugs that are listed in the Controlled Substances Act. The Pharmacy Commission, in consultation with the department of fish and wildlife, by rule will add or remove controlled substances authorized for use in wildlife chemical capture programs.

Under the WDFW Chemical capture credential, biologists and officers are limited to purchase, possess, and administer controlled substances approved by the Pharmacy Commission and adopted in rule.

**Agency veterinarians may purchase, possess, and administer other drugs within their scope of licensure.**

**Drug:** Articles recognized in the United States Pharmacopeia and National Formulary, or Homeopathic Pharmacopeia of the United States, or any supplement to any of them. Drugs are substances intended for the use in the diagnosis, cure, mitigation, treatment, or prevention of disease in humans or
other animals or to affect the structure or any function of the body of humans or other animals.

**Extra-label Use of Drugs:** The application of an approved drug in a manner not according to the directions on its label. Most drugs used in wildlife species are used in an extra-label manner because the extensive testing required for Food and Drug Administration (FDA) approval has not been done in wildlife. The *Animal Medicinal Drug Use and Clarification Act* (AMDUCA) of 1994 specifies protocol and record keeping for extra-label use of drugs, and requires the presence of a valid Veterinary Client Patient Relationship (see below) for the Extra-label use of drugs. AMDUCA applies to controlled substances, other legend drugs, and over the counter (OTC) drugs.

**Legend Drugs:** Drugs required by the Washington State Department of Health Pharmacy Quality Assurance Commission (Pharmacy Commission) rules to be dispensed by prescription only, or are restricted to practitioner use. These include DEA controlled substances and FDA prescription drugs.

**Over the Counter Drugs (OTC):** Drugs that are not controlled substances and do not require a prescription order to be prescribed; these medications cannot include medications listed “for veterinarian use to be issued by prescription only”. These medications have been found to be safe and appropriate for use without the supervision of a health care professional and they can be purchased by consumers without a prescription. Examples include some OTC antibiotics, dewormers, and vitamin injections.

**Prescription Drugs:** Drugs that are regulated by the FDA, state law or Pharmacy Commission and restricted to use by or on the order of a licensed veterinarian or physician (i.e. prescription only). The Pharmacy Commission shall designate in rule approved prescription drugs for use by WDFW Chemical Capture program.

**Veterinarian Client Patient Relationship (VCPR):** An established relationship between the veterinarian, his/her client and patient that exists when the veterinarian knows the patient (animal) well enough to be able to diagnose and treat any medical conditions that develop, and the client (caretaker of the animals) has agreed to follow the instructions of the veterinarian. Within WDFW, this relationship consists of an agency veterinarian, an agency biologist or officer (the Client), and the animal receiving the drugs (the Patient).

**Withdrawal Period:** The period between the administration of a drug to an animal and the time when the meat of that animal can be safely consumed. Withdrawal periods must be observed for controlled substances, other legend drugs, and OTC drugs.

1. **The Use of Controlled Substances and Prescription Drugs Shall Comply with all Federal and State Laws**
- The DEA and Pharmacy Commission regulate the inventory and use of controlled substances and require WDFW to maintain a DEA controlled substances registration for each field office that stores controlled substances.
- The FDA regulates the administration of all drugs in food producing animals, including wildlife.
- The Pharmacy Commission has granted the Department a limited registration under RCW 69.50, Controlled Substance Act; and RCW 69.41, Legend Drugs—Prescription Drugs, to purchase, possess, and administer certain controlled substances and legend drugs for wildlife management purposes.

2. **A Veterinarian Serves as WDFW’s Wildlife Drug Program Administrator**  
(See PRO XXXX for duties)

3. **A Designated Person Acts as Wildlife Drug Coordinator in Each Regional Office and in Select District Offices**  
(See PRO XXXX for duties)

4. **Employees Must Complete a WDFW Approved Training Course to Possess, Handle, or Administer Legend Drugs**

WDFW employees shall not possess, handle, or administer legend drugs unless they have completed a WDFW-approved training course within the preceding 5 years and their names have been placed on the Pharmacy Commission’s list of authorized WDFW employees. Training must be repeated every 5 years. The training includes the following subjects, written and practical tests:

- Basic drug pharmacology
- Characteristics of different immobilizing drugs
- Appropriate drug selection for the species to be immobilized
- Dosage calculations
- Drug delivery
- Wild animal care and welfare concerns
- Potential hazards
- Safe handling and administration of drugs
- Response to accidental human exposure
- Legal issues related to the administration of legend drugs
- Applicable state and federal laws, rules and regulations
- Record keeping and security requirements

5. **Legend Drugs Shall be Stored According to Federal and State Laws**  
(See PRO XXXX for requirements)

7. **Employees who Administer Legend Drugs, their Supervisors, Wildlife Drug Coordinators, and the Wildlife Drug Program Administrator are Responsible for Ensuring that Records are Maintained and Reports are Submitted as Required by Federal and State Laws. All receipts and invoices shall be maintained for a period of two years.**  
(See PRO XXXX for requirements)
8. **Employees Must Ensure that Meat Contaminated with Drug Residues Does Not Enter the Human Food Supply** (See PRO XXXX for procedure)

- All immobilized wildlife will be identified.
- Employees shall tag the animal with an ear tag issued by the Wildlife Drug Program Administrator that has a unique identification number, a warning to contact WDFW before consuming meat from the animal, and contact information for the Wildlife Drug Program Administrator.
- If an animal that received drugs is legally harvested within the drug withdrawal period, the hunter may be issued another tag at the discretion of the Regional Enforcement Captain.

9. **The Wildlife Drug Program Administrator Shall Approve the Purchase of All Legend Drugs; the Drugs Will be Shipped Directly to and Disposed of by the Regional and District Wildlife Drug Coordinators** (See PRO XXXX)

10. **A Physical Inventory of Legend Drugs Shall Be Performed, Reconciled, and Documented Every 12 Months** (See PRO XXXX for details)

11. **Employees Shall Use Immobilizing Drugs Only After all Other Alternatives, Including Physical Control or Allowing an Animal to Leave an Area on its Own, Have Been Considered and Deemed Inappropriate or Infeasible**

- Employees shall follow the procedures and techniques taught in their wildlife chemical immobilization training course.
- Employees shall not use legend drugs for the immobilization of domestic animals, except in an emergency situation.

12. **Employees Shall Use Immobilization Drugs and Equipment in a Manner That Ensures Maximum Safety to Themselves, Co-Workers, and the Public** (See PRO XXXX)

13. **Employees Shall Make Reasonable Efforts to Retrieve Darts, Needles, and Syringes Used during Field Immobilization Efforts and Dispose of Them Properly** (See PRO XXXX)
Effective Date: 

PROCEDURE XXXX

Cancels:  5303
See Also:  RCW 69.50.320; RCW 69.41.080; Applicable WAC Sections
PRO XXXX

Approval and Date

PRO - 5303 USING DRUGS TO CAPTURE WILDLIFE – GENERAL RESPONSIBILITIES AND EXPECTATIONS

Action By

Action

1. Wildlife Drug Program Statewide Administration

Wildlife Drug Program Administrator

a. Acts as a liaison with the Drug Enforcement Administration (DEA) and the Washington State Department of Health Pharmacy Quality Assurance Commission (Pharmacy Commission)

b. Maintains WDFW’s DEA and Pharmacy Commission registrations.

c. Provides the Pharmacy Commission with the names of Regional/District Drug Coordinators, and with current lists of employees authorized to possess and administer drugs for the capture and handling of wildlife.

d. Conducts wildlife drug training for employees.

e. Orders legend drugs from distributors.

f. Issues wildlife drug logs and ear tags.

h. Manages annual statewide drug inventory and drug log reconciliation.

i. Coordinates response to hunters who harvest previously immobilized wildlife.
2. **Wildlife Drug Program Regional/District Coordination**

- **Liaison** with the Wildlife Drug Program Administrator.
- Places drug orders with the Wildlife Drug Program Administrator.
- **Arranges** payment for drugs used in the Region or District.
- **Receives** legend drugs directly from the distributor and logs them into a Regional or District Perpetual Drug Log.
- **Maintains** a separate Perpetual Drug Log for each legend drug and controlled substance.
- **Maintains** a copy of the invoice that accompanies the drugs when they arrive from the distributor. Schedule II controlled substance invoices shall be stored separately in either a separate folder or file.
- Securely **stores** legend drugs and **issues** them to authorized employees.
- **Oversees** annual drug inventory and drug log reconciliation for assigned regional/district employees and **reports** results to the Wildlife Program Administrator by August 1st each year.
- **Maintains** all records relating to the receipt, issuance, inventory, and disposal of drugs for 2 years.

3. **Legend and Controlled Drug Storage in WDFW Offices and the Field**

- **Restricts access** to drugs and storage areas to those staff authorized to possess and administer legend drugs. **Store**:
  - Schedule III-IV drugs in a securely locked, substantially constructed cabinet or safe.
  - Schedule II controlled substances in a safe or steel cabinet equivalent to a U.S. Government Class V security container.
- **Registered** with the Pharmacy Commission as drug storage locations. District offices may be approved for drug storage as needed, if approved by the Wildlife Drug Program Administrator and registered with the Pharmacy Commission and the DEA.
- **Store** field supplies of controlled substances in a locked metal box securely attached to a locked WDFW vehicle that is assigned to an employee authorized to possess and administer controlled substances.
- The only legend drugs that may be stored in registered WDFW offices or vehicles for field use are those listed in WAC 246-886-180.
e. The only controlled substances that may be stored in registered WDFW offices or vehicles for field use are those listed in WAC 246-886-220.

4. **Drug Logs**

   **Staff Authorized to Possess and Administer Legend Drugs**

   a. Each employee who stores or administers legend drugs or controlled substances shall be **issued** a drug log, which is bound and has consecutively numbered pages.

   b. Each employee responsible for any drug transaction (dispensing or receiving) shall **complete** and **sign** that line of the drug log(s).

   c. Only one type of drug shall be **entered** on an individual page in the drug log.

   d. Drug logs shall accurately **reflect** the quantity of each drug in the employee’s possession, showing changes in drug amounts due to wildlife immobilization, spills, wastage, loss, destruction, theft or any other situation affecting drug quantity.

   e. **Maintain** their issued drug log and do not transfer it to another. **Keep** drug logs for two years after the last entry. **Keep** drug logs with issued drugs and available for inspection anytime.

5. **Identifying Immobilized Wild Animals**

   **Staff Authorized to Possess and Administer Legend Drugs**

   a. **Use** the issued ear tags to identify the immobilized wild animal. **Record** the ear tag number(s) on the *Wildlife Immobilization Record* (Attachment 1).

   b. **Send** a completed *Wildlife Immobilization Record* to the Wildlife Drug Program Administrator and the District or Regional Drug Coordinator for every immobilization event by e-mail within 24 hours of the immobilization event.

   c. In the case of a planned wildlife capture activity that is to occur in a remote setting where e-mail access might be restricted, **sends** a notice of intent to immobilize wildlife that includes dates, location, species, immobilizing drugs to be used, and ear tag numbers to be deployed by email to the Wildlife Program Administrator and the appropriate District or Regional Drug Coordinator prior to the initiation of the capture. Completed *Wildlife Immobilization Record(s)* shall be sent at the conclusion of the capture.

6. **Legend Drug Purchase and Disposal**
Regional/District Drug Coordinators

Staff Authorized to Possess and Administer Legend Drugs

Regional/District Drug Coordinators

a. **Orders** legend drugs through the Wildlife Drug Program Administrator. **Receives** drugs directly from the distributor. **Arranges** payment.

b. **Obtains** legend drugs from and **returns** expired drugs to the Regional/District Drug Coordinator.

d. **Sends** unneeded or expired controlled substances directly to a DEA-licensed disposal facility and **arranges** payment for disposal.

7. **Legend Drug Inventory and Drug Log Reconciliation**

Regional/District Drug Coordinators

Staff Authorized to Possess and Administer Legend Drugs, their Supervisors

Supervisors

Wildlife Drug Program Administrator

a. **Conducts** an annual legend drug physical inventory and **completes** an *Annual Legend Drug Inventory* form (Attachment 3).

b. **Conducts** an annual controlled substances physical inventory and **completes** a separate *Annual Controlled Substance Inventory* form for Schedule III-IV and Schedule II drugs (Attachments 4 and 5, respectively).

c. **Conduct** a physical **inventory** of each employee’s drugs and **reconcile** with the employee’s drug log by August 1 each year.

b. **Sends** memo (see **Attachment 2**) through the appropriate Regional/District Drug Coordinator to the Wildlife Drug Program Administrator by August 1st each year.

c. **Investigates** drug quantity discrepancies; immediately document and report them to the appropriate Regional/District Drug Coordinator, Wildlife Drug Program Administrator and WDFW Program management.

a. **Reports** any suspected loss of controlled substances to the DEA within 24-hours upon discovery. For any discrepancy that has not been corrected within seven days, **reports** the loss or theft in writing to the DEA via DEA 106 form and **provides** a copy of the DEA 106 form to the Pharmacy Commission.

b. **Provides** an amended DEA 106 form to the DEA and a copy to the Pharmacy Commission if the loss is reconciled or confirmed.
8. **Use of Legend Drugs - General Safety Considerations**

   a. Whenever feasible, employees using Schedule III-IV controlled substances or prescription drugs will **work with at least one other trained employee**.
   
   b. Employees using Schedule II opioid drugs shall **always be accompanied by at least one other trained employee**, a veterinarian, or emergency medical technician. Reversal drugs shall be **drawn up before** darts are prepared, and the accompanying person must be willing to **administer** the reversal drug in the event of an accidental exposure.
   
   c. Employees shall **always use appropriate safety equipment**, including eye protection and disposable gloves, to prevent accidental drug exposure. Clean water should be **available** to rinse spilled drugs off the skin and out of the eyes.
   
   d. Loaded darts shall be **transported** in a leak-proof and puncture-proof container.
   
   e. Employees shall **dispose** of drug vials, syringes, needles, and used darts in a safe manner and in compliance with all local, state, and federal laws. Employees shall **keep** a “sharps” container for this purpose in their assigned WDFW vehicle.

9. **Dealing with Lost Darts or Syringes**

   a. When darts or syringes containing drugs are lost in a populated area, employees shall **notify** the property owner or manager, close neighbors, and the local law enforcement agency **before** departing the scene.
   
   b. Also **notify** their supervisor, Regional office customer service staff, the Wildlife Program Regional Manager and Enforcement Captain as soon as practical.
Pro XXX Attachment 1  
WILDLIFE IMMOBILIZATION RECORD

<table>
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<tr>
<th>Responsible Person:</th>
<th>Date/ Time:</th>
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<tbody>
<tr>
<td>Location/ Circumstances:</td>
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<tr>
<td>Species:</td>
<td>Sex: ☐ Male ☐ Female ☐ Unknown</td>
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<tr>
<td>Estimated Weight:</td>
<td>Age: ☐ Adult ☐ Juvenile</td>
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<tr>
<td>Yellow “Call Before Consuming” Ear Tag #:</td>
<td>Ear: ☐ Right ☐ Left</td>
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<td>Additional Ear Tag #, if Applicable:</td>
<td>Color:</td>
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<td>Ear: ☐ Right ☐ Left</td>
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<thead>
<tr>
<th>Drug</th>
<th>Concentration (mg/ml)</th>
<th>1&lt;sup&gt;st&lt;/sup&gt; Volume (ml)</th>
<th>2&lt;sup&gt;nd&lt;/sup&gt; Volume</th>
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<tbody>
<tr>
<td>Telazol®</td>
<td>☐</td>
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<td>BAM™</td>
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<td>Ketamine</td>
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<td>Xylazine</td>
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<td>Other: ☐</td>
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| Injection Site: | |
|-----------------| |
| Time at Injection: | Time at Immobilization: | Time at Waking: |
| Degree of Anesthesia: ☐ Light ☐ Good ☐ Deep |

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<th>Reversal Drug:</th>
<th>Concentration (mg/ml)</th>
<th>Volume (ml)</th>
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<td>Yohimbine</td>
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<td>Tolazoline</td>
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<td>Atipamezole</td>
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<td>Naltrexone</td>
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Additional Medications/Complications:

☐ Released ☐ Euthanized

Release Location:

Remarks:

Pro XXX Attachment 2

Date

TO: (Wildlife Drug Program Administrator) Dr. Kristin Mansfield

THRU: (Regional/District Drug Coordinator)

FROM: (Supervisor)

SUBJECT: DRUG INVENTORY & DRUG LOG RECONCILIATION FOR

In accordance with federal and state law and Department policy, I have conducted a 100% drug inventory and drug log reconciliation for __________. The results are shown below. No significant discrepancies were found. Contact me for questions.

<table>
<thead>
<tr>
<th>Drug</th>
<th>Inventory Amount (ml or mg)</th>
<th>Drug Log Amount (ml or mg)</th>
<th>Remarks</th>
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Pro XXXX Attachment 3

ANNUAL LEGEND DRUG INVENTORY
(ex. xylazine, tolazoline, naltrexone, atipamezole, etc.)

Inventory Date: ____________________________ Time: ______________ Before Opening of Business/After Closing of Business

Name of Registrant: ______________ Registrants DEA Number: ____________________________

Printed Name and Signature of Person Taking the Inventory: ________

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<tr>
<th>Drug Name</th>
<th>Drug Strength (mg, mg/ml)</th>
<th>Drug Form (liquid, ointment)</th>
<th>Number of Unit (vials, tubes, etc.)</th>
<th>Total Quantity (mg, ml, oz)</th>
<th>Storage Location</th>
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Pro XXXX Attachment 4
ANNUAL CONTROLLED SUBSTANCE INVENTORY
Schedule III-V (ex. Telazol®, BAM™, ketamine)

Inventory Date: ______________________ Time: __________ Before Opening of Business/After Closing of Business

Name of Registrant: ______________________ Registrants DEA Number: ______________________

Printed Name and Signature of Person Taking the Inventory: ______________________

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<th>Drug Form (liquid, powder)</th>
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<th>Total Quantity (mg, ml)</th>
<th>Storage Location</th>
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ANNUAL CONTROLLED SUBSTANCE INVENTORY
Schedule II (thiafentanil, etorphine)

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<th>Number of Vials</th>
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