



Pharmacy Quality Assurance Commission
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**Model Policies and Procedures
for Sodium Pentobarbital Registration
Humane Societies and Animal Control Agencies**
[Chapter 246-886 WAC](#)

Please Note: This form must be completed fully. Failure to do so may result in a delay of processing. Include page one of this form whether the agency adopts the model policies and procedures or provides its own.

Date	Agreement: <input type="checkbox"/> New <input type="checkbox"/> Updated (Policies and Procedures) credential # _____		
Name of Facility:			
Mailing Address:			
Physical Address:			
Email:		Phone (enter 10 digit #):	
Primary Registrant:		Email:	
Authorized / Trained Personnel:			
Name		Title	

Purpose:

To establish policies and procedures pertaining to the acquisition, administration, record keeping and security of sodium pentobarbital (controlled substance) and approved legend drugs in compliance with the state and federal Controlled Substances Acts and state rules.

See [chapter 246-886 WAC](#) and [RCW 69.50.310](#).

General Policy:

- A. Each agency or society must maintain a current registration with the Washington State Pharmacy Quality Assurance Commission to purchase, possess, or administer sodium pentobarbital, and approved legend drugs. See [RCW 69.50.310](#); [WAC 246-886-020](#)
- 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 246-886-060](#) and [WAC 246-886-090](#).
 - Each agency or society shall promptly notify the Commission in writing of any amendments or deletions to the policies and procedures. [WAC 246-887-020](#).
- C. Only those agents and employees who have completed a Commission-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. See [WAC 246-886-040](#) & [RCW 69.50.310](#).
 - Each agency or society shall make available for inspection by the Commission or its designee a current list of individuals who are qualified to administer sodium pentobarbital and/or approved legend drugs.

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. See [WAC 246-886-090](#).
- 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 Pharmacy Quality Assurance Commission 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.¹ See [WAC 246-886-030](#).
 - Acetylpromazine (acepromazine)
 - Dexmedetomidine
 - Medetomidine
 - Xylazine

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. See [WAC 246-886-080](#). Entries will be recorded in ink and records will be retained for two years.
- B. Each agency or society will be responsible for designing a log sheet. To ensure the log book

¹ WDFW Chemical Capture Programs WAC 246-886-180 Approved Legend Drugs

contains sufficient detail to allow an audit to be performed, the log sheet will contain the following information: [WAC 246-886-080](#).

- date/time of administration;
 - animal breed;
 - animal's estimated age;
 - identification number (microchip, license or internal intake/disposition code);
 - weight;
 - route of administration;
 - dose – drug 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;
 - and amount of drugs wasted.
- 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 that has not been corrected within seven days shall be reported to the Commission.
See [WAC 246-886-080](#).
- G. All records shall be made available for inspection by the commission 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 Commission-approved training programs. (This is not meant to serve as or replace required training.) [WAC 246-886-040](#) Commission approved text:

- "The Handbook of Pentobarbital Euthanasia" by Tim Greyhavens (no longer in print)
- "The Humane Society of the United States Euthanasia Training Manual" by Rebecca H. Rhoades, DVM. (approved October 2003)
- American Humane Association Euthanasia by Injection (approved June 2009)
- The Humane Society of the United States Euthanasia Reference Manual 2nd Edition (copy write 2013 - publication number TXu 1-866-647) (approved January 2014)

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 - Compliant with recognized dosing guidelines.
- Intravenous – into the vein.
 - a. Animal may be conscious
 - b. Two handlers
 - Intraperitoneal – into the abdomen
 - a. Animal may be conscious
 - b. 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 two 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.