



Attachment A
2009-242

King County Animal Services and Programs Procedure (DW)

Title Shelter – Standards for Controlled Substances used by Veterinary Services		Document No. and Revision SH2-104A
Prepared by and Date: Sharon G. Hopkins, DVM, MPH		Effective Date: 3-19-09
Approved by and Date: 3-17-2009	Sharon G. Hopkins DVM, MPH	

Purpose

To describe the process for ordering, handling, dispensing, storing, recordkeeping, and security of controlled substances used in the shelter veterinary clinic.

Scope

Veterinary Services and Animal Care and Control staff

References

RCW 69.50, 69.41	Revised Code of Washington
WAC 246-886-080; 246-887-050; 060; 070; 080	Washington Administrative Code
Washington Department of Health, Board of Pharmacy	Model Policies and Procedures for the Administration and Recordkeeping of Legend Drugs

Forms

N/A	
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Records

N/A	
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Public Disclosure

Any issues regarding Public Disclosure should be coordinated with the RALS Disclosure Officer.

Definitions

Term	Description
Chameleon	The shelter management software program used to track shelter animals including medical treatment information.
Controlled substance	A drug, substance, or immediate precursor in Schedule I through V of Article II of chapter 69.50 RCW. Includes sodium pentobarbital used for euthanasia and other controlled substances used by Veterinary Clinic staff for induction of anesthesia, sedation, and pain management in shelter animals.
Controlled Substance Receipt and Distribution Log	A bound log book with consecutively numbered pages recording the initial receipt from the vendor of individual bottles/packages of controlled substances and the bottle/package number, date, and name of each area assigned an individual bottle or package.
Controlled Substance Administration Log	A bound log book with consecutively numbered pages that records each instance of administration/use of a controlled substance including date, bottle or package number, animal description, amount of drug used, and person administering the drug.
DEA	Drug Enforcement Administration, the federal agency charged with enforcing the controlled substances laws and regulations of the United States.
Designated Clinic Veterinarian	A licensed veterinarian employed at the KCACC animal shelter designated as responsible for maintaining compliance with procedures in Document SH2-101A Controlled Substances used by Veterinary Services.
Designated Veterinary Technician	A licensed veterinary technician employed at the KCACC animal shelter who works under the direction of the Designated Clinic Veterinarian to perform specified procedures related to handling and record keeping of controlled substances used by Veterinary Clinic staff.
KCACC	King County Animal Care and Control, a work center in the Animal Services and Programs section of the Records and Licensing Services Division.
Public Health Veterinarian	The veterinarian employed by Public Health—Seattle & King County responsible for oversight of shelter veterinary services and who

Term	Description
	supervises the Clinic Veterinarians.
Shelter	KCACC facilities located in Kent and Bellevue (Crossroads) devoted to animal intake, care, housing, and administration.
Shelter Manager	The KCACC Manager or Superintendent responsible for shelter and field programs and who co-supervises Clinic Veterinarians and Veterinary Technicians.
Veterinary Clinic	The area of the KCACC shelter in Kent that houses medical and surgical facilities for animal care, including the surgery suite, surgery prep area, pharmacy, and veterinarian's office.
Veterinary Clinic Staff	Licensed veterinarians and veterinary technicians employed by KCACC and based in the on-site Veterinary Clinic in Kent who are responsible for surgical procedures and medical care of shelter animals.

Policies

1. A licensed veterinarian employed at the KCACC shelter's Veterinary Clinic shall be designated as responsible for assuring compliance with the policies and procedures regarding the ordering, receipt, secure storage, dispensing, administration, and recordkeeping of all controlled substances used in connection with surgical sterilization, euthanasia, and care of animals at KCACC animal shelters.
2. All controlled substances shall be stored, maintained, administered, dispensed and prescribed in compliance with federal and Washington state laws.
3. Clinic veterinarians shall comply with the State Board of Pharmacy requirements for controlled substances in chapter 69.50 RCW, and approved legend drugs in chapter 69.41 RCW.
4. All controlled substances shall be stored in accordance with WAC 246-933-320.
5. Controlled substances will not be dispensed to persons adopting or fostering a shelter animal except under exceptional circumstances with the approval of the Designated Clinic Veterinarian. Dispensing a controlled substance may be considered if a licensed medical professional is providing foster care for a shelter animal that requires a controlled substance for pain management. In such case, controlled substances shall be dispensed in accordance with RCW 18.92.012, 18.92.013 and WAC 246-933-340(5).
6. Controlled substances maintained in the Veterinary Clinic will not be available for use by shelter staff when the clinic is closed and no Veterinary Clinic staff are present at the shelter. Veterinary Clinic staff will provide non-controlled substance analgesics for

animals requiring pain management during days the Veterinary Clinic is closed (e.g., Sundays, Furlough days).

7. A record of all controlled substances administered or dispensed shall be kept in the individual animal's Chameleon record.

Procedures

1.0 Registration process

Action By	Action
Designated Clinic Veterinarian	1) Ensure proper registration with appropriate agencies for ordering and dispensing of controlled substances. <ol style="list-style-type: none"> a. Drug Enforcement Administration (DEA) of the US Department of Justice: Maintain current DEA registration applicable to Federal and State Institutions (Appendix A). b. Washington State Board of Pharmacy: For purposes of compliance with WAC 246-887-200, the Washington State Board of Pharmacy (WSBP) application will include a list of controlled substances to be used and the names of persons authorized to access the controlled substances.

2.0 Order process

Action By	Action
Designated Clinic Veterinarian or Designated Veterinary Technician	2) Perform an inventory of controlled substances at least monthly for purposes of maintaining adequate supplies.
Designated Clinic Veterinarian	3) Order replacement supplies of controlled substances through County-approved veterinary supply vendor through the standard County procurement process. If Class II controlled substances are ordered, use DEA Form 222 and other standard forms required by the Washington State Board of Pharmacy and the U.S. Drug Enforcement Administration.
Designated Clinic Veterinarian or Designated Veterinary Technician	4) Maintain a separate file for all Class II controlled substances invoices with their respective DEA 222 order forms for 3 years.
Designated Clinic Veterinarian or Designated	5) Upon receipt of shipment of controlled substances: <ol style="list-style-type: none"> a. Conduct an inventory to ensure quantity ordered was received.

Action By	Action
<p>Veterinary Technician</p>	<p>b. Assign each bottle or box the next ascending inventory number for the current year. Format the numbers XX-YY where X=the bottle number and Y=the last 2 digits of the year the bottle was received.</p> <hr/> <p>Example: 14-09 indicates the fourteenth bottle of diazepam received in calendar year 2009.</p> <hr/> <p>c. When marking new inventory, use a permanent marker and write clearly. Record the number on the bottle taking care not to obliterate the expiration date. Also record the number on the bottle cap. For drugs packaged in a box containing multiple small vials (e.g., buprenorphine, <i>Buprenex</i>®), record the inventory number on the box only.</p> <p>d. Attach a red LOG label to each bottle or container of controlled substance received to indicate that administration of this drug must be logged into the Controlled Substance Administration Log, except that for buprenorphine (<i>Buprenex</i>®) the label may be affixed to the multi-vial box rather than the individual single dose vials. Take care that the LOG label is not placed over the bottle number or the expiration date of the drug.</p> <p>e. Log each bottle received into the Controlled Substances Receipt and Distribution Log using ink for all entries. Enter the bottle number, the date logged in, and initial the designated column for each entry. Keep the Log in the locking cabinet designated for the supply of drugs in current use.</p> <hr/> <p>Note: Maintain a separate section in the bound Controlled Substances Receipt and Distribution log for each controlled substance. (Appendix B).</p> <hr/> <p>f. Secure unassigned inventory (those bottles or boxes not assigned to the working area) of controlled substances in the secure safe located within the Veterinary Clinic.</p> <p>g. Keep the safe locked at all times except when actively storing incoming inventory or removing a drug being transferred to the working area.</p> <p>h. Access to the safe is limited to the Designated Clinic Veterinarian, other veterinarians employed at the Veterinary Clinic excluding relief or short-term temporary staff, and the Designated Veterinary Technician.</p>

3.0 Drug access, inventory, and use

Action By	Action
Designated Clinic Veterinarian	1) Approve Veterinary Clinic staff members who are authorized to access and administer controlled substances. Only licensed veterinarians or veterinary technicians who are either County employees or performing veterinary services pursuant to contract may be granted this authorization.
Designated Clinic Veterinarian	2) Notify the Board of Pharmacy in writing of any individuals who have been approved to administer controlled substances.
Designated Clinic Veterinarian or Designated Veterinary Technician	<p>3) Transfer inventory to working area</p> <ul style="list-style-type: none"> a. Ensure a working supply of needed controlled substances is maintained in the lockable cabinet and lockable refrigerator in clinic area. <ul style="list-style-type: none"> i. The working cabinet and refrigerator may remain unlocked during times the Veterinary Clinic is in operation and Veterinary Clinic staff are present. ii. The working cabinet is locked when no Veterinary Clinic staff are present in the clinic or at the reception desk or waiting room immediately outside the Veterinary Clinic. iii. The working cabinet and refrigerator are kept locked after clinic hours and on Sundays, holidays, and Furlough days when the Veterinary Clinic is closed. b. Choose the drug with the next consecutive ascending number and log it out of the Controlled Substances Receipt and Distribution Log by recording the date transferred from the safe to the working supply and signing. c. Double check that each bottle or box transferred to the working supply is clearly and properly labeled. d. Log the bottle or box into the Administration Log by recording in ink the drug name, bottle number, volume of drug, and initials. e. Review Controlled Substance Administration log for the controlled substance being added to the working supply. <ul style="list-style-type: none"> i. Check that quantity remaining in the working supply per the Administration Log equates with the quantity left remaining in the bottle at the time new bottle(s) are added to the working inventory ii. Bring any discrepancy to the attention of the

Action By	Action
	<p style="text-align: center;">Shelter Manager or Public Health Veterinarian.</p> <hr/> <p>Note: If a mistake is made in the Distribution log or the Administration log, do not white-out or otherwise obliterate the entry. Instead, line-through the entry with the error in a manner that does not obscure the original entry. Correct the entry on the next available line, date, and initial.</p>
<p>Designated Clinic Veterinarian or Designated Veterinary Technician</p>	<p>4) Maintain three (3) separate bound Controlled Substance Administration Log books, one for each group of controlled substances as follows:</p> <ul style="list-style-type: none"> a. Sodium pentobarbital or sodium pentobarbital/phenytoin combination (<i>Beuthanasia</i>®) b. Butorphanol (<i>Torbutrol</i>®, <i>Torbugesic</i>®) c. All others
<p>Veterinary Clinic staff</p>	<p>5) Start a new double-page of the Controlled Substance Administration Log each day that controlled drugs are used in the veterinary clinic. (Appendix C)</p> <p>6) Record the date (month/day/year) in ink on the upper left hand side of the page.</p> <p>7) Record each instance of use of a controlled substance in the Administration Log as follows:</p> <ul style="list-style-type: none"> a. Animal ID # b. Owner (e.g., shelter or adopter's name) c. Location (cage or run #) d. Species, breed e. Color f. Procedure (reason for use, such as type of surgery) g. Animal weight (lbs) h. Animal age (months) i. Name of controlled substance used and Bottle # j. Starting balance of controlled substance at the beginning of the day k. Volume administered l. Initials of person administering m. Balance remaining in the bottle at the end of the day <hr/> <p>Note: Do not white-out or obliterate any incorrect entries. See note in 3)c above.</p>
<p>Veterinary Clinic staff</p>	<p>8) Use the Controlled Substances Administration Log as follows:</p> <ul style="list-style-type: none"> a. Enter the animal identification information as described in 7) above. b. Verify that the current balances of each drug have

Action By	Action
	<p>been transferred to the top of the page correctly from the preceding day.</p> <ul style="list-style-type: none"> c. When adding a new bottle or box to the working supply, enter the inventory number in the column labeled "New Bottle Name/#", initial, and change the balance to reflect the addition. d. Use a calculator when adding and subtracting drug amounts to ensure accuracy. e. Record the balance remaining of each drug at the end of the day. Initial the balance to signify that you have double-checked the math for accuracy. f. Carry forward the balance for each drug to the top of the column labeled for each drug for the next work day.
Veterinary Clinic staff	9) Record each instance of use of a controlled substance into the Chameleon electronic record for the individual animal receiving the drug.

4.0 Process for controlled substances discrepancies including theft, loss, or diversion

Action By	Action
Veterinary Clinic staff	1) In the event a discrepancy in the administration and/or inventory of a controlled substance is detected by any staff member, immediately bring this to the attention of the Clinic Veterinarian on duty.
Veterinary Clinic staff	2) Investigate any discrepancies that are noted and if substantiated, immediately bring them to attention of the Designated Clinic Veterinarian or the Designated Veterinary Technician if the Designated Clinic Veterinarian is not available.
Designated Clinic Veterinarian or Designated Veterinary Technician	3) Immediately investigate the reported discrepancy.
Designated Clinic Veterinarian	4) Document findings including any corrective action and notify the Shelter Manager or Public Health Veterinarian within 3 days of discrepancies that cannot be resolved.
Shelter Manager or Public Health Veterinarian	5) Any discrepancy that has not been corrected within seven (7) days shall be reported to the Board of Pharmacy.
Shelter Manager or Public Health Veterinarian	6) In the event of theft, loss or diversion of any controlled substance, notify local law enforcement (Kent Police Department) and report to the Drug Enforcement Administration (DEA) and to the Washington State Board of

Action By	Action
	Pharmacy by submitting a written report along with a completed DEA-106 form.

5.0 Process for expired or contaminated drugs

Action By	Action
Designated Clinic Veterinarian	1) Contact the Washington State Board of Pharmacy at 360-236-4825 for information pertaining to authorized disposal procedures, sites and/or contractors for bottles of sodium pentobarbital or other controlled substances that have expired or are contaminated.

6.0 Monthly audit and reporting

Action By	Action
Designated Clinic Veterinarian	1) Perform a monthly audit by comparing a physical inventory of each controlled substance's volume remaining with the record of the drug's distribution as documented in the Administration Log for each controlled substance.
Designated Clinic Veterinarian	2) Within 3 days of the monthly audit, submit a written report to the Shelter Manager or Public Health Veterinarian.
Shelter Manager or Public Health Veterinarian	3) Document, investigate and report any unresolved discrepancies within seven (7) days to the Washington State Board of Pharmacy and the U.S. Drug Enforcement Administration (DEA) in writing (form DEA-106). Note: Also document actual inventory discrepancies in the appropriate log book.

Appendices

A – Controlled Substance Registration Certificate, DEA # BC7382675, expires 8-31-2010.

B -- Controlled Substance Receipt and Distribution Log (log book heading)

C – Controlled Substance Administration Log (log book heading with sample entries)

Revision Index Table

Revision Letter	Reason For Revision	Date
A	Release of document	3-19-2009

Appendix A (SH2-104 A)

CHRISTENSEN, MARILYN E DVM
 KING COUNTY ANIMAL SHELTER
 21615 64TH SOUTH
 KENT, WA 98032-0000-000



DEA REGISTRATION NUMBER	THIS REGISTRATION EXPIRES	FEE PAID
BC7382675	08-31-2010	FEE EXEMPT
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE
2,2N, 3,3N,4,5,	PRACTITIONER	09-05-2007
CHRISTENSEN, MARILYN E DVM KING COUNTY ANIMAL SHELTER 21615 64TH SOUTH KENT, WA 98032-0000		

CONTROLLED SUBSTANCE REGISTRATION CERTIFICATE
 UNITED STATES DEPARTMENT OF JUSTICE
 DRUG ENFORCEMENT ADMINISTRATION
 WASHINGTON D.C. 20537

This registration is only for use at Federal or State institutions.

Sections 304 and 1008 (21 USC 824 and 958) of the Controlled Substances Act of 1970, as amended, provide that the Attorney General may revoke or suspend a registration to manufacture, distribute, dispense, import or export a controlled substance.

THIS CERTIFICATE IS NOT TRANSFERABLE ON CHANGE OF OWNERSHIP, CONTROL, LOCATION, OR BUSINESS ACTIVITY, AND IT IS NOT VALID AFTER THE EXPIRATION DATE.

CONTROLLED SUBSTANCE REGISTRATION CERTIFICATE
 UNITED STATES DEPARTMENT OF JUSTICE
 DRUG ENFORCEMENT ADMINISTRATION
 WASHINGTON D.C. 20537

DEA REGISTRATION NUMBER	THIS REGISTRATION EXPIRES	FEE PAID
BC7382675	08-31-2010	FEE EXEMPT
SCHEDULES	BUSINESS ACTIVITY	ISSUE DATE
2,2N, 3,3N,4,5,	PRACTITIONER	09-05-2007
CHRISTENSEN, MARILYN E DVM KING COUNTY ANIMAL SHELTER 21615 64TH SOUTH KENT, WA 98032-0000		

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3/12/09

Appendix C (SH2-104 A)

ID#	Owner	Loc	Breed	Color	Proc.	Wt
34872	Shelter	C8	DMH	black	CS	2.2
34962	SH	C11	DLH	org tab/wt	CN	3.7
35540	SH	C9	DSH	br/wt	CN	5.62
35463	SH	C12	DLH	br/wt	CS	3.0
35447	SH	C7	DSH	org tab	CN	5.11
34711	SH	D7	DSH	gray tab	inappotent	
35447	SH	C7	DSH	org tab	CN	repeat
35473	female	200	DSH	org/wt	CN	est. 6
20472	female/sit	202	DSH	blk	CN	
35471	female	212	DSH	blk+tab	CN	
35470	female	205	DMH	blk+kc	CN	
35474	female	213	DSH	blk	CN	
35469	female	211	DSH	br/ie	CS	
35542	Rebecca Foster	C4	Chihuahua	tan/blk	DN	6#
35285	female	192	DSH	blk	CN	
35287	female	191	DSH	gray tab/ie	CS	

