Certified Animal Euthanasia Technician

T R A I N I N G
C O U R S E
H A N D B O O K

2025

Sponsored by

Louisiana Board of Veterinary Medicine

5825 Florida Blvd, Baton Rouge, LA 70806
Office: 225-925-6620 Fax: 225-925-6622
www.lsbvm.org Email: admin@lsbvm.org or director@lsbvm.org

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Class Schedule *(Tentative)* – New Orleans, LA

Friday, February 14, 2025

8:00 am	8:30 am	REGISTRATION (Coffee & Donuts)	
8:30 am	8:45 am	WELCOME	Ana Zorilla, CEO, LA SPCA
8:45 am	9:00 am	INTRODUCTION	Jared Granier, LBVM
9:00 am	9:30 am	LEGAL CONCERNS & CERTIFICATION	Jared Granier, LBVM
9:30 am	10:00 am	RECORDKEEPING & INVENTORY REQUIREMENTS Drug Enforcement Agency	??? DEA
10:00 am	10:30 am	RECORDKEEPING & INVENTORY REQUIREMENTS LA Board of Pharmacy	??? LA Board of Pharmacy
10:30 am	10:45 am	BREAK	
10:45 am	12:00 pm	HUMANE EUTHANASIA – USE OF SODIUM PENTOBARBITAL & ANIMAL RESTRAINT	Kerry Backsen, DVM - LA SPCA
12:00 pm	12:30 pm	**LUNCH (provided on-site)**	
12:30 pm	1:30 pm	STRESS MANAGEMENT & HUMAN SAFETY	Ana Zorilla, LA SPCA
1:30 pm	2:15 pm	PERSONAL HEALTH WELLNESS	FELIX VANDERLICK, HPFLA
2:20 pm	3:20 pm	WRITTEN EXAMINATION	
3:20 pm	---	PRACTICAL EXAMINATION *follows written examination at the LASPA*	

The Louisiana Board of Veterinary Medicine adheres to all guidelines of the Americans With Disabilities Act (ADA).

The law mandates that applicant requests for special accommodations in attendance of the course and to take examinations must be made in a timely manner to the Board and accompanied by documentation from a licensed professional or certified specialist appropriate for the disability which:

1. Validates the nature of the disability;
2. Confirms the need for special accommodations; and
3. Suggests a reasonable accommodation.

If you have a request for special accommodations, contact the Board office in writing at admin@lsbvm.org PRIOR to the date of training.

Notice to All CAETs and Veterinarians *(from April 7, 2011)*

Act 764 regarding Animal Control Shelter Euthanasia, effective June 30, 2010.

Although we are all presumed to know the law, it has come to the LBVM's attention that perhaps some CAETs and/or veterinarians may be unaware of a new law recently passed by the 2010 LA Legislature. Please take notice that Act 764 of the 2010 LA Legislative Session took effect June 30, 2010 and states "euthanasia by intracardiac injection on cats and dogs shall be prohibited unless the animal is unconscious or rendered completely unconscious and insensitive to pain through the injection of an anesthetic." Such prohibition is applicable to animal control shelters and their animals located on site as well as their animals which may be transported to a veterinary clinic for euthanasia. The performance of euthanasia by intracardiac injection in violation of the new law by a CAET and/or veterinarian is sanctionable.

According to the clear wording of the new law, the term "unconscious" has the literal meaning of lacking awareness and the capacity for sensory perception; involuntary. In addition, the clear wording "rendered completely unconscious and insensitive to pain through the injection of an anesthetic" means general anesthesia by injection and not mere sedation.

The prohibition in Act 764 does not apply to the practice standards of veterinary medicine for veterinarians and CAETs performing euthanasia by intracardiac injection in veterinary practice sites other than animal control shelters and/or on animal control shelter animals. Temporary transfer of ownership of the animal to the veterinarian by the animal control shelter for euthanasia by cardiac injection is a violation of the law.

The euthanasia by intracardiac injection on cats and dogs will continue to be taught in the CAET course, however, special note will be made regarding the lawful limited use of this procedure.

In closing, do not confuse the effective date of the above prohibition with the different effective date of the prohibition for euthanasia by carbon monoxide gas chambers which begins on January 1, 2013 (also set forth in Act 764).

INTRODUCTION

Welcome to the training and certification program for Certified Animal Euthanasia Technicians sponsored by the Louisiana Board of Veterinary Medicine. This course is designed to teach you the legal, record-keeping, safety, and practical information you need to become a certified animal euthanasia technician.

Euthanasia is the act or practice of permitting the death of sick or injured animals in a relatively painless way for reasons of mercy. The word *euthanasia* is from the Greek word *eu-thanatos* which means "easy death".

There will be two examinations administered in this course. The first examination is a written exam consisting of multiple-choice questions which will cover the materials presented at this course. The second examination will be a practical demonstration of your ability to properly restrain an animal, measure a correct dosage of sodium pentobarbital, locate an injection site, and perform an injection. You must score no less than 70% on each examination to pass as a requirement towards full certification.

The areas in which you will be tested are:

Animal restraint	DEA & CDS regulations	Record-keeping and inventory
Certification	Legal concerns	Sodium Pentobarbital Usage

COURSE INSTRUCTORS

Jared B. Granier, MBA - Executive Director

Louisiana Board of Veterinary Medicine

Kerry Backsen, DVM

Louisiana SPCA

n/a

Compliance Officers, LA Board of Pharmacy

Felix Vanderlick

Healthcare Professionals' Foundation of Louisiana (HPFLA)

Ana Zorillo, CAWA

Louisiana SPCA

LOUISIANA ADMINISTRATIVE CODE
Professional and Occupational Standards

Title 46:LXXXV. Veterinarians

Chapter 12. Certified Animal Euthanasia Technicians

(Also available online at www.lsbvm.org/practice-act.)

I. **Louisiana Board of Veterinary Medicine** *[La. R.S. 37:1511 & 1515]*

A. The Louisiana Board of Veterinary Medicine (Board) was created within the Department of Health and Hospitals with the intent of promoting the public health, safety, and welfare by safeguarding the people of Louisiana. The Board does this by its regulation of the practice of veterinary medicine in the state including the regulation of Certified Animal Euthanasia Technicians (CAETs) for animal control. Per Act 515 of the 2018 Regular Session, effective August 1, 2018, the Louisiana Board of Veterinary Medicine was moved to the Louisiana Department of Agriculture and Forestry.

B. This is accomplished by ensuring that persons are properly trained and educated before receiving CAET certification.

C. The Board has the power to: *[La. R.S. 37:1518 & 1558]*

1. Examine and determine the qualifications of applicants. *[La. R.S. 37:1553 & §1201]*
2. Issue and renew licenses to qualified person.
3. Discipline licensees. *[La. R.S. 37:1554]*
4. Adopt and amend rules necessary for the regulation of CAETs. *(Chapter 12 and 14)*

D. Discipline of CAET licensees

1. CAETs may be disciplined or have their CAET certification revoked by the Board for (but not limited to):
   i. Failing to carry out CAET duties including the proper maintenance and security of sodium pentobarbital and other controlled substances and drugs (Section IV following);
   ii. Abusing the use of sodium pentobarbital or other controlled substances;
   iii. Selling or giving sodium pentobarbital or other controlled substances for recreational use;
   iv. Stealing sodium pentobarbital or other controlled substances;
   v. Becoming a user of sodium pentobarbital or other controlled substances;
   vi. Employing fraud, misrepresentation, or deception in obtaining a CAET certificate.

2. Penalties that may be imposed by the Board include, but are not limited to: *[La. R.S. 37:1557]*

   i. Revocation or suspension of certification;
   ii. Imposition of a monetary fine;
   iii. Issuance of reprimand against the certificate;
   iv. Placement of CAET on probation and/or condition;
   v. Restriction of the authorized scope of practice.

II. **What is a Certified Animal Euthanasia Technician (CAET) and a CAET's Responsibilities?** *[La. R.S. 37: 1552 & 1200 and La. R.S. 37:1556 & §1225]*

A. CAETs are persons certified by the Board as being qualified to provide humane capture, restraint, and death of unwanted, discarded, diseased, or otherwise dangerous animals.

B. CAETs are trained in the proper methods of:

1. Humane euthanasia of animals by injection of legal drugs;
2. Drug security precautions; and
3. Record keeping and related skills.

C. The duties of a CAET include:

1. Preparation of animals for humane euthanasia;
2. Careful and accurate recording of drug dosages used and any drug waste;
3. Maintaining the security of sodium pentobarbital and other drugs, including proper record keeping;
4. The humane capture, restraint, and euthanasia of animals; and
5. The legal disposal of animal bodies.

D. CAETs are also responsible for maintaining their certificates in a current, valid status and in notifying the Board of any address changes including changes in employment.

E. CAETs are required to report any infractions of Board statutes and rules and any misuse of drugs to the Board office for review.

F. Only one CAET at a facility may register with the Louisiana Board of Pharmacy-Controlled Dangerous Substance Program (CDS) and Drug Enforcement Administration (DEA) in order to be able to purchase and maintain sodium pentobarbital for animal euthanasia at the shelter.

G. If an animal control facility decides not to register a CAET with CDS and DEA, the shelter facility must have a staff or consulting Louisiana licensed veterinarian who is registered with CDS and DEA at the shelter location to obtain and be responsible for the controlled substances to be stored and used at the shelter facility. *[§704]*
   1. The controlled substances obtained by the veterinarian for the shelter facility must be stored and administered under general supervision of the veterinarian. The veterinarian must provide animal control personnel with written instructions and follow-up assistance on the proper storage, use, and administration of the drugs.
   2. The veterinarian must submit a written protocol of his supervision of animal control personnel and a usage plan to the Board for review and acceptance.
   3. The veterinarian must require animal control facility personnel to maintain proper records/logs which records must be reviewed by the veterinarian at least quarterly.

H. When leaving employment at a shelter/facility, the CAET who holds the drug registrations is responsible for:
   1. Returning his/her DEA registration and any unused DEA order forms to DEA;
   2. Returning his/her CDS license to LBP-CDS; and
   3. Properly transferring any unused controlled substances to another CDS/DEA registered CAET or veterinarian or returning the unused controlled substances and drugs to the supplier.

III. **Maintenance, Security, and Record Keeping** *[§1223 & 1225]*

A. Storage
   1. All sodium pentobarbital and other drugs must be stored securely in a locked cabinet of substantial construction of metal, or in a safe.
   2. Safekeeping of the combination or keys for the lock is the responsibility of the CAETs.

B. Usage
   1. Usage logs must be maintained to account for each cc or part of sodium pentobarbital and other drugs used at the facility. Logs must include (page 46, exhibit #1 or page 49, exhibit #4 - samples):
      i. The date of use;
      ii. The lot number and bottle number used;
      iii. The amount of drug used;
      iv. The identification or description of the animal;
      v. Name of person administering drug; and
      vi. Amount of drug wasted, spilled, or lost and the name and signature of a witness to the waste, spill, or loss.
   2. Usage logs must be reviewed at least quarterly and the quantity of sodium pentobarbital and other drugs, used and on hand, must be tallied (page 47, exhibit #2 - sample). Any variance should be noted and steps taken to correct any problems.

3. The CDS/DEA registered CAET (or Lead CAET) must review each use of sodium pentobarbital and other drugs used for animal restraint and capture and initial the usage log entries.
4. Both the CDS/DEA registered CAET (or Lead CAET) and the certified technician that the sodium pentobarbital is transferred to must sign a drug sign-out document each time a drug is transferred for use (page 50, exhibit #5 - sample).
5. Documenting the removal of sodium pentobarbital or other drugs must include:
    i. A signed log indicating person removing the drug;
    ii. Date drug is removed;
    iii. The amount of drug returned and account of drug usage;
    iv. Date remaining drug returned and signature of person returning it;
6. Removal of sodium pentobarbital or other controlled substances and drugs from the locked, secure, storage cabinet must be in minimal amounts and must be kept in a locked container when not in use.

C. Inventory
1. An initial physical inventory of all drugs must be performed when a CAET first receives CDS/DEA registrations.
2. A perpetual inventory of sodium pentobarbital and all other drugs (controlled substances) must be maintained (page 49, exhibit #4 - sample).
3. Inventory must be conducted by the CAET, Lead CAET, or licensed veterinarian who is registered with CDS and DEA for the animal control facility.
4. A physical inventory must be conducted every quarter [3 months] (page 47, exhibit #2 - sample).
5. Inventories shall indicate:
    i. The amount of sodium pentobarbital and other drugs presently on hand;
    ii. The amount of sodium pentobarbital and other drugs used for euthanasia, capture, and restraint;
    iii. The amount of drug lost due to spillage or waste;
    iv. The amount lost due to expiration; and
    v. The time and date inventory taken.
6. Copies of inventory records must be provided to the Board upon written request and must be available for review by DEA officials without notification.

D. Ordering
1. Drug orders must be made on a DEA 222 order form.
2. No alterations or scratch outs are allowed
    i. Messed up forms must have “VOID” written on them and kept in a file
3. The date and amounts of drugs received must be noted on the order form.
4. If drugs must be returned to suppliers or transferred to another person who holds DEA and LBP CDS registration:
    i. The recipient must complete a DEA 222 order form;
    ii. Both the recipient and transferor must maintain a copy of the DEA 222 form.

E. Destruction of Sodium Pentobarbital
1. Sodium pentobarbital must not be destroyed without prior approval from DEA.
2. Any destruction of sodium pentobarbital must be witnessed by a law enforcement officer.

F. Theft of sodium pentobarbital or other drugs from a facility/shelter must be reported to the local police, DEA, and LBP-CDS.

G. Records must be kept for the present year plus the immediate five previous years. Records include, but not limited to:
1. Inventory documents;
2. Usage logs;
3. Order forms;
4. Theft reports; and

5. Reports of destruction.

IV. **Certificate Renewal** *[§1213 and 1215]*

A. CAET certificates expire September 30 of each year.

B. The renewal period runs from July 1 through the September 30 expiration date of each year.

C. Renewals received in the board office postmarked after the expiration date are considered late and are subject to the late renewal fee.

1. If the late renewal fee was due but not included with the renewal submission, the renewal will be returned to the licensee incomplete. The licensee's certificate will be expired and invalid until the renewal is returned to the board office complete.

All renewals are completed online through the **LBVM License Portal** at www.lsbvm.org/licenseportal.

D. A minimum of six (6) continuing education hours is required as a pre-requisite to renewal of certificates. *[§1227]*

1. Continuing education must be taken in the year immediately preceding the renewal period = July 1 to June 30 (see IV.B. above for renewal period).
2. CAETs who fail to obtain the required continuing education will not meet the requirements for renewal of their certificates. Their certificates will expire on the expiration date and will remain expired until the continuing education requirement is met and a complete renewal = including renewal form, renewal fee payment, late fee payment, and proof of continuing education = is submitted. CAETs are not allowed to perform their duties without holding a valid, current certification.
3. Names of CAETs whose certificates expire will be provided to government agencies, including DEA and CDS, and any interested parties that make inquiry.
4. All continuing education programs must be pre-approved by the Board prior to attendance.
5. Proof of continuing education program attendance must be submitted with renewal form and fee payments annually.
6. The idea is that continuing education is important to the enhancement and bettering of the animal control arena. Not only can certified CAETs benefit from annual CE, but all employees of animal control facilities can benefit from attendance at CE programs during the year in areas that will increase the competency of the animal control facility to humanely deal with the animals and to better serve the public.

V. **"Lead" CAET Designation** *[La. R.S. 37: 1552 & 1200 and La. R.S. 37:1556 & §1225]*

A. A Lead CAET is a CAET who is authorized by the employing shelter facility and designated by the Board as responsible for the maintenance and security of controlled substances and drugs on the site for use in animal capture and restraint, as well as for euthanasia.

B. One CAET, if there is no veterinarian registered for the site, must be designated as the "Lead" CAET for a facility in order for that facility to be able to purchase and maintain chemical capture drugs for use in animal restraint and capture.

C. The duties of a Lead CAET include:

1. All duties prescribed for a CAET;
2. The ordering of supplies and drugs for the employing facility;
    i. Those controlled substances a Lead CAET may legally order and maintain for the use in animal restraint, capture, and euthanasia are:
        a. Tiletamine hydrochloride and Zolazepam hydrochloride;
        b. Ketamine hydrochloride; and

c. Sodium pentobarbital (minimum strength of 6 grains per milliliter).

ii. Prior to ordering, maintaining, and providing controlled substances under his own authority, the Lead CAET must register his "Lead CAET" designation for the shelter location with the DEA and state LBP CDS Program.

3. Responsibility for the proper maintenance and security of all controlled substances and drugs for the purpose of animal restraint, capture, and euthanasia, including proper record keeping;
4. Providing chemical capture drugs to those employees of the facility who have completed an approved course in the use of chemical capture drugs;
    i. Prior to providing chemical capture drugs to these persons, the Lead CAET shall have and maintain on file copies of documentation that the persons using the chemical capture drugs have completed an approved training course in the use of chemical capture drugs.

D. Recordkeeping:
    1. Proper record keeping is described in Section III above.
    2. Lead CAETs transferring drugs to qualified employees for use in capture must record:
        i. The date of use;
        ii. The species of animal;
        iii. Estimated weight of animal;
        iv. Dose amount administered; and
        v. Name of qualified employee drug transferred to.

HOW TO APPLY FOR LEAD CAET DESIGNATION

1. Establish Full CAET status through Board following completion of course and successfully passing the written and practical examinations.

2. Complete a Board-approved Chemical Capture Course and submit the proof of completion to the Board of Veterinary Medicine.

3. Complete the **Lead CAET Designation Application** and submit it to the LBVM. The Lead CAET Designation Application form is available at https://lsbvm.org/app-caet.

4. Apply for CDS License with Louisiana Board of Pharmacy Controlled Dangerous Substance for **Schedule II-N drugs**. See page 15 below for more instructions.

5. Email to the LA Board of Veterinary Medicine a copy of your shelter's DEA registration.

   (Note: it does NOT need to include your name. You **MUST be approved** as the new Lead CAET at your shelter **BEFORE** you can have your CDS license updated and **BEFORE** your name can be added to the shelter's DEA registration.)

AFTER Lead CAET Designation status has been approved by the Board, you must then complete the following:

1. Email the LA Board of Pharmacy at info@pharmacy.la.gov and request that your CDS license change to include **Schedule III-N drugs**. See page 15 below for more instructions.

2. Contact the DEA to request that the shelter's DEA license change to include your name on the license and to include **Schedule III-N drugs** (if it does not already).

3. Email a copy of both updated LA Board of Pharmacy's CDS license and DEA license to the Board at admin@lsbvm.org.

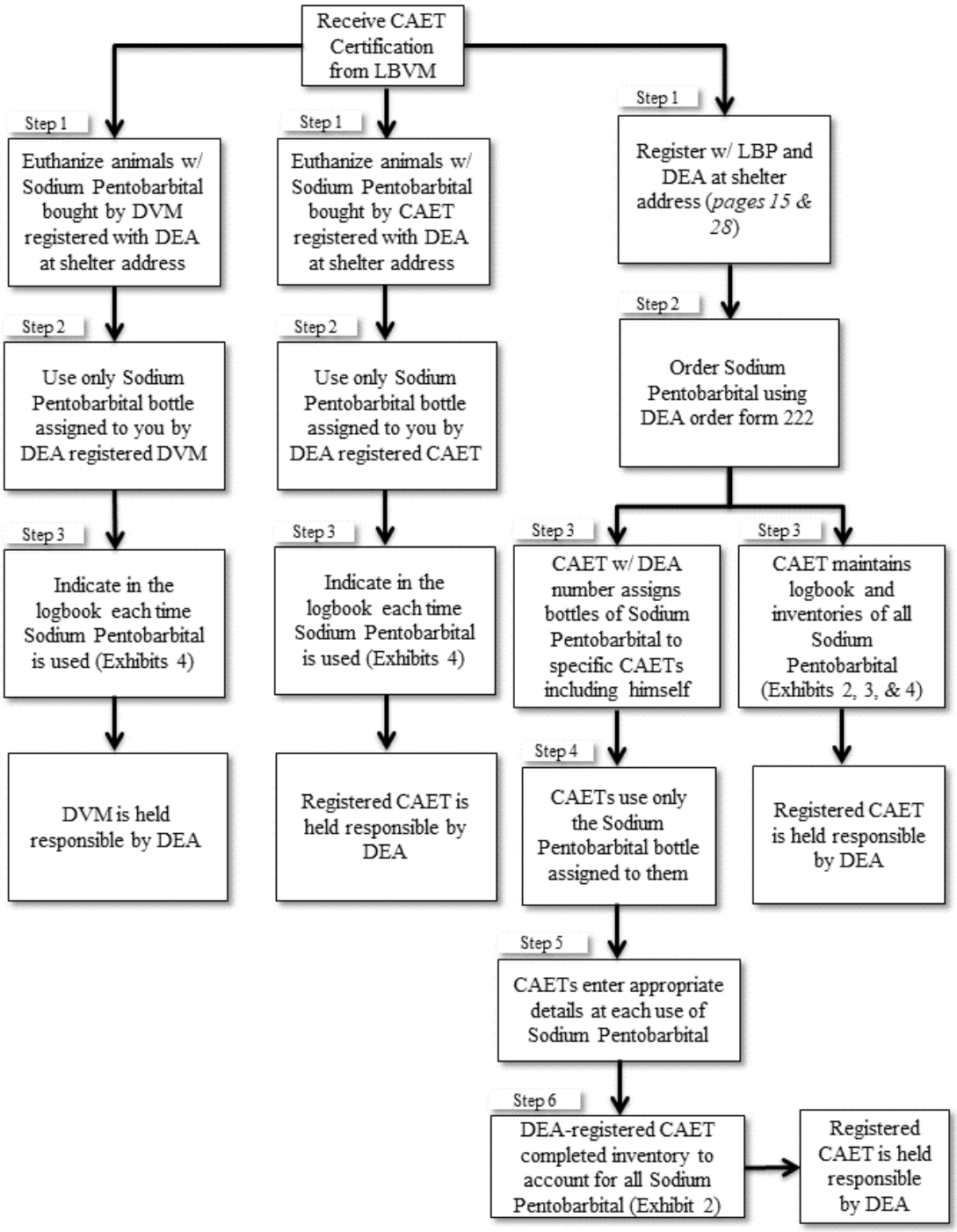
Annual Renewal of CAET Certifications (Full & Lead)

All CAET certifications expire annually on September 30 and must be renewed online between July 1 and September 30. If you perform any functions of a CAET in Louisiana with an expired certificate, you are in direct violation of the LA Veterinary Practice Act, which is a serious offense for which the Board can take disciplinary action through which greater fines and penalties may be imposed.

All CAETs are also required to complete a minimum of six (6) hours of continuing education annually for certification renewals. Continuing education details can be found at www.lsbvm.org/ce-policies-caets. Please visit www.lsbvm.org/renewal for more details regarding the online renewal process.

FLOW CHART OF RESPONSIBILITIES for FULL CAETs and LEAD CAETs

Step #1 - Depends on whether you need to become registered with the DEA. If no one else is registered at the shelter to order drugs, you will need to register. If a DVM or another CAET is registered to order drugs, you can have the Sodium Pentobarbital or controlled substance/drugs assigned to you for use in euthanizing animals and restraint/capture.



Louisiana Board of Pharmacy

IF YOU HAVE ANY QUESTIONS REGARDING STATE REGULATIONS PERTAINING TO THE CONTROLLED DANGEROUS SUBSTANCE LICENSE OR SODIUM PENTOBARBITAL, PLEASE CONTACT:

Joe Fontenot, Compliance Officer

Louisiana Board of Pharmacy

CONTROLLED DANGEROUS SUBSTANCES PROGRAM

3388 Brentwood Drive
Baton Rouge, LA 70809-1700

225-925-6496

info@pharmacy.la.gov

HOW TO APPLY FOR CDS LICENSE

WITH LOUISIANA BOARD OF PHARMACY

For Full CAET, you may follow the steps below to log into the LA Board of Pharmacy website and apply for the **Schedule II-N** privileges.

For LEAD CAET Designation, if you have applied for and have been granted LEAD CAET designation by the LBVM and have a CDS license, you may login to your already established account at https://secure.pharmacy.la.gov/ and upload a written request to be reclassified as lead and you're your schedules updated to include **Schedule III-N.**

Online Applications - Visit the LA Board of Pharmacy website at www.pharmacy.la.gov, then select "Apply", then "CDS licenses", then "Web Portal Page".

Returning Applicants - If you have ever applied for a credential with the Louisiana Board of Pharmacy, you already have a username and password even if you have never logged in. Please use the provided "Forgot User ID" and/or "Forgot Password" links, in that order, if you do not know your login information. If you are unable to retrieve your username and password, you may email licensing@pharmacy.la.gov. Do not create a new account.

New Applicants - If you are a new applicant, meaning you have never applied for a credential with the Board, you may register a new account by clicking "Register". A verification email will be sent to you after all information is submitted. After registering your account, you will receive an email with a link to verify your account.

After logging in, complete the following steps to have your CDS license properly updated:

1. Select "Online Services"
2. Select "Create/Continue an Application"
3. Select "Start next to one of the following:"

- CDS License - Animal Euthanasia Technician, Certified (AET-C)
  Select – "Schedule II-N Only"
- CDS License - Animal Euthanasia Technician, LEAD
  Select - Schedule II-N
  Select – Schedule III-N

Paper Applications - Paper applications will be mailed to the applicant upon written request for a paper application. You may mail your written request to:

Louisiana Board of Pharmacy
3388 Brentwood Drive
Baton Rouge, La 70809

LOUISIANA ADMINISTRATIVE CODE

Title 46:LIII - Professional and Occupational Standards

Chapter 27. Controlled Dangerous Substances

(Also available online at www.pharmacy.la.gov under "Resources" then "Laws & Regulations".)

Subchapter A. General Provisions

§2701. Definitions

Certified Animal Euthanasia Technician—an individual authorized by law and certified by the Louisiana State Board of Veterinary Medicine to practice animal euthanasia.

Subchapter B. Licenses

§2705. Licenses and Exemptions

A. Every person who conducts research with, manufactures, distributes, procures, possesses, prescribes, or dispenses any controlled dangerous substance within this state, including third-party logistics providers, or who proposes to engage in the research, manufacture, distribution, procurement, possession, prescribing, or dispensing of any controlled dangerous substance within this state shall obtain a controlled dangerous substance (CDS) license from the board prior to engaging in such activities. Only persons actually engaged in such activities are required to obtain a CDS license; related or affiliated persons, e.g., stockholder in manufacturing corporation, who are not engaged in such activities, are not required to be licensed. The performance of such activities in the absence of a valid CDS license shall be a violation of R.S. 40:973 and:

I. Certified Animal Euthanasia Technician. The issuance of a CDS license to a certified animal euthanasia technician, and the renewal thereof, shall require the possession of a valid and verifiable license or other credential issued by the Louisiana Board of Veterinary Medicine, or its successor.

§2707. Licensing Procedures

A. Application for Initial Issuance of CDS License

1. An individual or other entity desiring to obtain a Louisiana CDS license shall complete the application form supplied by the board and submit it with the required attachments and appropriate fees, as set forth in R.S. 40:972 and R.S. 40:1013, to the board.
2. The applicant shall provide a complete street address reflecting the location where the applicant will engage in the activity for which a Louisiana CDS license is required. The board shall issue only one CDS license for each applicant at each such location.
3. The board shall not process applications received by facsimile, or that are incomplete, or submitted with the incorrect fees.
4. Applicants not in possession of a valid and verifiable license or other credential from a standing professional board of the State of Louisiana, or from the Louisiana Administrative Code Department of Health, Bureau of Health Services Financing, Health Standards, or their successors, or from the Louisiana Department of Agriculture and Forestry, shall submit to a criminal history record check upon request by the board. The applicant shall pay for the cost of the criminal history record check. The board shall evaluate the findings of the report of the criminal history record check prior to the issuance of the CDS license.

5. An individual or other entity who knowingly or intentionally submits a false or fraudulent application shall be deemed to have committed a prohibited act under R.S. 40:961 et seq., or its successor.

6. A CDS license shall be valid for a period of one year, and shall expire annually on the date of initial licensure unless revoked sooner in accordance with the provisions of the Uniform Controlled Dangerous Substances Law or these rules.

7. Practitioners in possession of a temporary or restricted license issued by a standing professional board of competent jurisdiction in the state of Louisiana may be issued a temporary or restricted Louisiana CDS license adhering to the limitations or restrictions of their board license.

B. Application for Renewal of CDS License

1. A licensee shall complete the application for renewal of a CDS license and submit same to the board prior to the expiration date of the current license. The application shall be submitted in such form and contain such data and attachments as the board may require and be accompanied by the appropriate fees, as set forth in R.S. 40:972 and R.S. 40:1013.

2. The board shall not process applications received by facsimile, or that are incomplete, or submitted with the incorrect fees.

3. A CDS license not renewed by the expiration date shall be classified as expired. A licensee shall not engage in any activity requiring a valid CDS license while his license is expired.

4. A CDS license not renewed within 30 days following the expiration date shall be automatically terminated by the board. The reissuance of a terminated CDS license shall require compliance with the board's reinstatement procedures.

D. Maintenance of CDS Licenses

1. A CDS license is valid only for the entity or person to whom it is issued and shall not be subject to sale, assignment or other transfer, voluntary or involuntary, nor shall a license be valid for any premises other than the business location for which it is issued.

2. In order to maintain a CDS license, the applicant shall maintain a federal license required by federal law to engage in the manufacture, distribution, prescribing, or dispensing of controlled substances.

3. The licensee shall inform the board of any and all changes to its business location/address within 10 days, with documentation, attesting to any change of business location/address, with notice to include both the old and new address. A change in business address of a facility may require an inspection by the board or its designee.

4. A duplicate or replacement license shall be issued upon the written request of the licensee and a payment of the fee shall be charged as provided by R.S. 40:972. A duplicate or replacement license shall not serve or be used as an additional or second license.

§2711. Actions on Licenses

M. Surrender of License

1. Any person or facility holding a valid CDS license which ceases to engage in activity requiring a CDS license shall surrender said license to the board upon termination of this activity.

2. Upon the surrender of said license, the person or facility shall forward all controlled substances and any unused order forms in his possession or under his control to the United State Drug Enforcement Administration as provided by federal laws and regulations.

3. In the event a person or facility surrenders his DEA Registration to the DEA, then the person or facility shall surrender his CDS license immediately to the board.

4. The acceptance of the voluntary surrender of a CDS license by the board shall result in the automatic suspension of the CDS license for an indefinite period of time.

Subchapter C. Security Requirements

§2713. General Requirements

A. A licensee shall provide effective controls and procedures to guard against theft or diversion of controlled substances. In evaluating the overall security system of a licensee or applicant, the board may consider any of the following factors:

1. the type of activity conducted (e.g., processing of bulk chemicals, preparing dosage forms, packaging, labeling, cooperative buying, etc.);
2. the type and form of controlled substances handled (e.g., bulk liquids or dosage units, usable powders or nonusable powders);
3. the quantity of controlled substances handled;
4. the physical location of the premises;
5. the type of building construction comprising the facility and the general characteristics of the building(s);
6. the type of vault, safe, and secure enclosures or other storage system(s) used;
7. the adequacy of key control systems, combination lock control systems, or both;
8. the adequacy of electric detection and alarm systems, if any, including use of supervised transmittal lines and standby power sources;
9. the extent of unsupervised public and visitor access to the facility including maintenance personnel and non-employee service personnel;
10. the adequacy of supervision of employee access;
11. local police protection or security personnel;
12. the adequacy for monitoring the receipt, manufacture, distribution, procurement, and disposition of controlled substances; and
13. the applicability of the security requirements contained in all federal, state, and local laws and regulations governing the management of waste.

B. When physical security controls become inadequate, the physical security controls shall be expanded and extended accordingly.

§2717. Physical Security Controls…

E. The licensee shall not employ, as an agent or employee who has access to controlled substances, any person who has been convicted of a felony offense relating to controlled substances or who, at any time, had an application for registration with the DEA denied, had a DEA registration revoked or has surrendered a DEA registration for cause. For purposes of this Subsection, the term "for cause" includes surrender in lieu of, or as a consequence of, any federal or state administrative, civil or criminal action resulting from an investigation of the individual's handling of controlled substances.

F. The licensee shall notify the board and the Field Division Office of the DEA in his area, in writing, of the theft or significant loss of any controlled substances within one business day of discovery of such loss or theft. The licensee shall also complete, and submit to the board and the Field Division Office of the DEA in his area, DEA Form 106, or its electronic equivalent, regarding the loss or theft. When determining whether a loss is significant, a licensee should consider, among others, the following factors:

1. the actual quantity of controlled substances lost in relation to the type of business;
2. the specific controlled substances lost;

3. whether the loss of the controlled substances can be associated with access to those controlled substances by specific individuals, or whether the loss can be attributed to unique activities that may take place involving the controlled substances;

4. a pattern of losses over a specific time period, whether the losses appear to be random, and the results of efforts taken to resolve the losses, and, if known;

5. whether the specific controlled substances are likely candidates for diversion;

6. local trends and other indicators of the diversion potential of the missing controlled substance.

G. Whenever the licensee distributes a controlled substance (without being registered as a distributor, as permitted by law) he shall comply with the requirements imposed on non-practitioners.

Subchapter E. Recordkeeping Requirements

§2731. General Information

A. Persons Required to Keep Records and File Reports

1. Each licensee shall maintain the records and inventories and shall file the reports required by this Chapter, except as exempted by this Section. Any licensee who is authorized to conduct other activities without being registered to conduct those activities by federal law shall maintain the records and inventories and shall file the reports required by this Section for persons registered to conduct such activities. This latter requirement should not be construed as requiring stocks of controlled substances being used in various activities under one registration to be stored separately, nor does it require that separate records are required for each activity. Thus, when a researcher manufactures a controlled item, he shall keep a record of the quantity manufactured; when he distributes a quantity of the item, he shall use and keep invoices or order forms to document the transfer; when he imports a substance, he keeps as part of his records the documentation required of an importer; and when substances are used in chemical analysis, he need not keep a record of this because such a record would not be required of him under a registration to do chemical analysis. All of these records may be maintained in one consolidated record system. Similarly, the researcher may store all of his controlled items in one place, and every two years take inventory of all items on hand, regardless of whether the substances were manufactured by him, imported by him, or purchased domestically by him, of whether the substances will be administered to subjects, distributed to other researchers, or destroyed during chemical analysis.

8. With respect to any and all records required by this Chapter which are maintained in a language other than English, the person responsible for maintaining such records shall provide a document accurately translating such records to English within 72 hours of such request by the board or an agent of the board.

B. Maintenance of Records and Inventories

1. Except as otherwise provided in this Section, every inventory and other records required to be kept under this Section shall be kept by the licensee and be available, for at least two years from the date of such inventory or records, for inspection and copying by authorized employees of the board.

a. Financial and shipping records may be kept at a central location, rather than at the registered location, if the licensee has notified the board in writing of his intention to keep central records. All notifications shall include the following:

i. the nature of the records to be kept centrally;

ii. the exact location where the records will be kept;

iii. the name, address, DEA registration number and type of DEA registration of the licensee whose records are being maintained centrally;

iv. whether central records will be maintained in a manual, or computer readable, form.

§2733. Inventory Requirements

A. General Requirements. Each inventory shall contain a complete and accurate record of all controlled substances on hand on the date the inventory is taken, and shall be maintained in written, typewritten, or printed form at the registered location. An inventory taken by use of an oral recording device shall be promptly transcribed. Controlled substances shall be deemed to be "on hand" if they are in the possession of or under the control of the licensee, including substances returned by a customer, ordered by a customer but not yet invoiced, stored in a warehouse on behalf of the licensee, and substances in the possession of employees of the licensee and intended for distribution as complimentary samples. A separate inventory shall be made for each registered location and each independent activity registered, except as provided in this Section. In the event controlled substances in the possession or under the control of the licensee are stored at a location for which he is not registered, the substances shall be included in the inventory of the registered location to which they are subject to control or to which the person possessing the substance is responsible. The inventory may be taken either as of opening of business or as of the close of business on the inventory date and that option shall be indicated on the inventory.

B. Initial Inventory Date. Every person required to keep records shall take an inventory of all stocks of controlled substances on hand on the date he first engages in the manufacture, distribution, or dispensing of controlled substances, in accordance with this Section as applicable. In the event a person commences business with no controlled substances on hand, he shall record this fact as the initial inventory.

C. Biennial Inventory Date. After the initial inventory is taken, the licensee shall take a new inventory of all stocks of controlled substances on hand at least every two years. The biennial inventory may be taken on any date which is within two years of the previous biennial inventory date.

§2735. Continuing Records

A. General Requirements

1. Every licensee required to keep records pursuant to this Section shall maintain on a current basis a complete and accurate record of each such substance manufactured, imported, received, sold, delivered, exported, or otherwise disposed of by him.
2. Separate records shall be maintained by a licensee for each registered location except as provided in §2731.B. In the event controlled substances are in the possession or under the control of a licensee at a location for which he is not registered, the substances shall be included in the records of the registered location to which they are subject to control or to which the person possessing the substance is responsible.
3. Separate records shall be maintained by a licensee for each independent activity for which he is registered, except as provided in Subsection B of this Section.
4. In recording dates of receipt, importation, distribution, exportation, or other transfers, the date on which the controlled substances are actually received, imported, distributed, exported, or otherwise transferred shall be used as the date of receipt or distribution of any documents of transfer (e.g., invoices or packing slips).

§2737. Reports

D. Reports of Theft or Loss. The licensee shall notify the New Orleans Field Division Office of the DEA, or its successor, and the board, in writing, of any theft or significant loss of any controlled substances within one business day of discovery of such theft or loss. The supplier is responsible for reporting in-transit losses of controlled substances by the common or contract carrier selected pursuant to Subsection E of this Section, within one business day of discovery of such theft or loss. The licensee shall also complete, and submit to the

New Orleans Field Division Office of the DEA, or its successor, and the board, DEA Form 106, or its electronic equivalent, regarding the theft or loss. Thefts and significant losses shall be reported whether or not the controlled substances are subsequently recovered or the responsible parties are identified and action taken against them. When determining whether a loss is significant, a licensee should consider, among others, the following factors:

1. the actual quantity of controlled substances lost in relation to the type of business;
2. the specific controlled substances lost;
3. whether the loss of the controlled substances can be associated with access to those controlled substances by specific individuals, or whether the loss can be attributed to unique activities that may take place involving the controlled substances;
4. a pattern of losses over a specific time period, whether the losses appear to be random, and the results of efforts taken to resolve the losses, and, if known;
5. whether the specific controlled substances are likely candidates for diversion; and
6. local trends and other indicators of the diversion potential of the missing controlled substance.

§2743. Procurement Requirements

A. Orders for Schedule I and II Controlled Substances

1. General Requirements. A licensee acquiring controlled substances in Schedules I and II shall maintain a file of the duplicate copies of all order forms used to obtain controlled substances within these schedules. Each duplicate copy of any order form used to order controlled substances shall be kept in this file a minimum of two years from the date the order form was completed. This file shall be kept separate from the licensee's other business or professional records. These records shall contain the full name, address and license number of the supplier, the common or established name of the controlled substance, its dosage form and strength, the amount, and the date of receipt.
2. DEA Form 222. Either a DEA Form 222 or its electronic equivalent is required for each distribution of a Schedule I or II controlled substance except for the following:
    a. distributions to persons exempted from registration by federal or state law;
    b. exports from the United States that conform to federal requirements;
    c. deliveries to a registered analytical laboratory or its agent approved by DEA;
    d. delivery from a central fill pharmacy to a retail pharmacy.
3. Electronic Orders
    a. Electronic orders for Schedule I or II controlled substances shall comply with the federal requirements set forth in 21 CFR §1305.21 and §1311 or their successors.
        i. To be valid, the purchaser shall sign an electronic order for a Schedule I or II controlled substance with a digital signature issued to the purchaser, or the purchaser's agent, by DEA as provided by federal law.
        ii. The following data fields shall be included on an electronic order for Schedule I and II controlled substances:
            (a). a unique number the purchaser assigns to track the order. The number shall be in the following 9-character format: the last two digits of the year, X, and six characters as selected by the purchaser;
            (b). the purchaser's DEA registration number;
            (c). the name of the supplier;
            (d) the complete address of the supplier (may be completed by either the purchaser or the supplier);

(e). the supplier's DEA registration number (may be completed by either the purchaser or the supplier);

(f). the date the order is signed;

(g). the name (including strength where appropriate) of the controlled substance product or the National Drug Code (NDC) number (the NDC number may be completed by either the purchaser or the supplier);

(h). the quantity in a single package or container;

(i). the number of packages or containers of each item ordered.

iii. An electronic order may include controlled substances that are not in schedules I and II and noncontrolled substances.

b. Procedure for Filling Electronic Orders

i. A purchaser shall submit the order to a specific supplier. The supplier may initially process the order (e.g., entry of the order into the computer system, billing functions, inventory identification, etc.) centrally at any location, regardless of the location's registration with DEA. Following centralized processing, the supplier may distribute the order to one or more registered locations maintained by the supplier for filling. The licensee shall maintain control of the processing of the order at all times.

ii. A supplier may fill the order for a Schedule I or II controlled substance, if possible and if the supplier desires to do so and is authorized to do so under federal law.

iii. A supplier shall do the following before filling the order.

(a). Verify the integrity of the signature and the order by using software that complies with federal law to validate the order.

(b). Verify that the digital certificate has not expired.

(c). Check the validity of the certificate holder's certificate by checking the DEA's certificate revocation list.

(d). Verify the licensee's eligibility to order the controlled substances by checking the certificate extension data.

iv. The supplier shall retain an electronic record of every order, and, linked to each order, a record of the number of commercial or bulk containers furnished on each item and the date on which the supplier shipped the containers to the purchaser. The linked record shall also include any data on the original order that the supplier completes. Software used to process digitally signed orders shall comply with DEA's requirements digital certificates for electronic orders.

v. If an order cannot be filled in its entirety, a supplier may fill it in part and supply the balance by additional shipments within 60 days following the date of the order. No order is valid more than 60 days after its execution by the purchaser.

vi. A supplier shall ship the controlled substances to the registered location associated with the digital certificate used to sign the order.

vii. When a purchaser receives a shipment, the purchaser shall create a record of the quantity of each item received and the date received. The record shall be electronically linked to the original order and archived.

B. Orders for schedule III, IV, and V controlled substances. All licensees acquiring controlled substances in schedules III, IV, or V shall maintain complete and accurate records of all order forms a minimum of two years from the date of each such receipt. These records shall contain the full name, address, and license number of the supplier, the common or established name of the controlled substance, its dosage form and strength, the amount and the date of receipt.

§2749. Disposal of Controlled Substances

A. Any person in possession of any controlled substance and desiring or required to dispose of such substance may request assistance from the special agent in charge of the DEA in the area in which the person is located for authority and instructions to dispose of such substance. The request should be made as follows:

1. if the person is a licensee, he shall list the controlled substance or substances which he desires to dispose of on DEA Form 41, and submit three copies of that form to the special agent in charge in his area; or
2. if the person is not a licensee, he shall submit to the special agent in charge a letter stating:
    a. the name and address of the person;
    b. the name and quantity of each controlled substance to be disposed of;
    c. how the applicant obtained the substance, if known; and
    d. the name, address, and registration number, if known, of the person who possessed the controlled substances prior to the applicant, if known.

B. The special agent in charge shall authorize and instruct the applicant to dispose of the controlled substance in one of the following manners:

1. by transfer to person licensed by the board and authorized to possess the substance;
2. by delivery to an agent of the DEA or to the nearest office of the DEA;
3. by destruction in the presence of an agent of the DEA or other authorized person; or
4. by such other means as the special agent in charge may determine to assure that the substance does not become available to unauthorized persons.

C. In the event that a licensee is required regularly to dispose of controlled substances, the special agent in charge may authorize the licensee to dispose of such substances, in accordance with this Section, without prior approval of the DEA in each instance, on the condition that the licensee keep records of such disposals and file periodic reports with the special agent in charge summarizing the disposals made by the licensee. In granting such authority, the special agent in charge may place such conditions as he deems proper on the disposal of controlled substances, including the method of disposal and the frequency and detail of reports.

§2751. Distributions and Transfers of Controlled Substances

B. Distribution to Supplier, Third-Party Logistics Provider, or Manufacturer

1. Any person lawfully in possession of a controlled substance listed in any schedule may distribute (without being registered to distribute) that substance to the person from whom he obtained it or to the manufacturer of the controlled substance, or if designated, to the manufacturer's registered agent or accepting returns, provided that a written record is maintained which indicates the date of the transaction, the name, form and quantity of the controlled substance, the name, address, and DEA Registration Number, if any, of the person making the distribution, and the name, address, and DEA registration number of the supplier or manufacturer. In the case of returning a controlled substance listed in Schedule I or II, a DEA 222 order form shall be used and maintained as the written record of the transaction. Any person not required to register shall be exempt from maintaining the records required by this Section.
2. Distributions referred to in this Subsection may be made through a freight forwarding facility operated by the person to whom the controlled substance is being returned, provided that prior arrangement has been made for the return and the person making the distribution delivers the controlled substance directly to an agent or employee of the person to whom the controlled substance is being returned.

Subchapter G. Administrative Procedures

§2753. Inspections

A. The board may inspect any licensed facility or location of a licensed person including pertinent records for the purpose of determining compliance with the requirements of this Chapter and other state and federal laws and regulations related to controlled substances, subject to the limitations identified in R.S. 40:988.B and R.S. 40:988.C.

§2755. Seizures

A. The board may place under seal all drugs or devices that are owned by or in the possession, custody, or control of a licensee at the time his license is suspended or revoked, for a licensee's failure to timely renew his license, or at the time the board refuses to renew his license.

FREQUENTLY ASKED QUESTIONS (FAQs)
LA BOARD OF PHARMACY

What does "CDS" mean?

CDS is the acronym for Controlled Dangerous Substances, and this term is synonymous with the term "controlled substances." Both of these terms are used to describe those medications subject to certain restrictions on their use. Examples of controlled substances include amphetamines, narcotics and other opiates, anabolic steroids, and benzodiazepines. The Controlled Substances Act of 1970 established the five schedules of controlled substances, and they are enumerated in 21 USC 812 as well as 21 CFR 1308. The Louisiana version of the controlled substances schedules are enumerated in the Uniform Controlled Dangerous Substances Act, more specifically in La R.S. 40:964.

For a current list of controlled substances, you may consult any of several websites, including the U.S. Drug Enforcement Administration (DEA) site at www.deadiversion.usdoj.gov, or the LA Board of Pharmacy's site at www.pharmacy.la.gov. You may also consult the LBP's publication, Laws and Regulations.

What is a CDS license and how is it different from a DEA registration?

The U. S. Congress established the DEA and charged that federal agency with administering the provisions of the Controlled Substances Act. The DEA requires any person who wishes to manufacture, distribute, possess, prescribe, or dispense any controlled substance to apply to that agency for a registration, and to possess a DEA registration before engaging in any of those activities. Upon receipt of an application for a DEA registration, that agency will seek to confirm with the appropriate state agency that the applicant possesses the authority from the state government to perform the stated activity. It is the state legislature that provides the authority for certain groups of people to distribute, possess, prescribe, or dispense controlled substances; in most cases, professional practice acts contain the authority to work with controlled substances.

The CDS license is simply the manifestation of the state's authority to work with controlled substances. The CDS license is supplied to the DEA to demonstrate eligibility for a DEA registration. In Louisiana, one must possess both a CDS license and a DEA registration to prescribe, possess, distribute or dispense controlled substances.

What is the normal processing time for a CDS license application?

The LBP process applications in the order in which they are received in the Board office. Applicants are encouraged to read the application instructions prior to submitting materials, since incomplete applications are the most common reason for return and delayed processing. You should allow two to four weeks for the processing of accurately completed applications, although the LBP strives to issue your license as soon as possible.

How can I verify the status of a Controlled Dangerous Substance (CDS) license?

On the Board's website, select the CDS link on the menu bar, and then select License Verifications.

PERPETUAL INVENTORY

What does “perpetual inventory control” mean? It means that your controlled substance records should be reconciled each time a unit or a dosage is added or removed from stock, an inventory document should immediately reflect the transaction. If you are visited by an inspector, investigator, or law enforcement officer, the official should be able to reconcile the amount of controlled drugs on hand with the inventory document and they should be equal.

Another way of saying this is that you should keep your perpetual inventory as you would want or hope your check book to be kept, always up to date and accurate so you know exactly how much money, or in this case, controlled substances, you have.

This is to be a permanent type document, such as a ledger book in which pages are not easily torn out or removed without being obvious (a computerized document utilizing one of the “spread sheet” programs is acceptable, though make sure it is adequately “backed up”). A “spread sheet” format with a “credit or deposit” column for purchases and a “debit or withdraws” column for uses must be included.

There must be a separate “perpetual inventory” document for each controlled substance utilized. The information required for the “dispensers log” may be combined with perpetual inventory into a single document. This information shall include the patient’s name, the amount given, the date, and the practitioners initials (see 21 CFR 1304.24).

All controlled substance records must be separated into Schedule II records and Schedule III, IV, and V records. They must be maintained for five years (five previous years and the current calendar year) and must be kept secure.

If you have any further questions about Louisiana Controlled Dangerous Substance Regulations, you may contact them at (225) 925-6496 or write:

Joe Fontenot, Executive Director

Controlled Dangerous Substance Program

Louisiana Board of Pharmacy

3388 Brentwood Drive

Baton Rouge, LA 70809-1700

Phone: 225-925-6496

Drug Enforcement Administration

IF YOU HAVE ANY QUESTIONS OR ARE UNSURE HOW YOUR SHELTER OPERATES WITH REGARDS TO THE PURCHASING, RECORD-KEEPING, STORAGE AND INVENTORY OF SODIUM PENTOBARBITAL, OR IF YOU NEED TO KNOW WHO AT YOUR SHELTER NEEDS TO REGISTER WITH THE DEA, PLEASE CONTACT THE FOLLOWING AGENT WITH THE DRUG ENFORCEMENT ADMINISTRATION, DIVERSIONS:

Robin Hogue, Group Supervisor

Drug Enforcement Administration

Division Group 70

Email: Robin.m.hogue@usdoj.gov

Office: 571-362-4742

www.deadiversion.usdoj.gov

STEPS TO TAKE WITH DEA REGISTRATION FOR ANIMAL SHELTERS WITH DRUG ENFORCEMENT ADMINISRATION'S OFFICE OF DIVERSION CONTROL

Not all CAETs will need to register with the DEA and LBP. A shelter can be registered under one veterinarian, or under the name of one "designated" CAET for the purchase and maintenance of sodium pentobarbital or one Lead CAET for the purchase and maintenance of sodium pentobarbital and other controlled substances for capture purposes. LBP will allow only one CAET or one Lead CAET to be registered at a shelter if there are no veterinarians registered at the shelter. The registered veterinarian(s) or CAET is responsible for purchasing and properly maintaining the shelter's sodium pentobarbital for euthanasia. The registered veterinarian(s) or Lead CAET is responsible for purchasing and properly maintaining the shelter's controlled substances for the use in animal capture as well as sodium pentobarbital for euthanasia. However, all Board certified CAETs at the facility may administer sodium pentobarbital for the purpose of animal euthanasia, and all properly trained animal capture officers may administer capture drugs for the purpose of animal capture and restraint.

All animal shelters should already have a DEA registration specific to the shelter with one of the following listed on the shelter's DEA registration:

- A veterinarian
  -- OR --
- A "designated" Full CAET
  -- OR –
- A Lead CAET

The shelter manager/director should contact Robin Hogue with the DEA Diversion Control Division if someone needs to be removed and a new DVM, "designated" CAET or Lead CAET needs to be added to the shelter's DEA registration.

<u>To add a new LEAD CAET to the shelter's DEA registration</u>, the new person MUST first:

1. Apply for and be issued his/her Lead CAET certification with the LA Board of Veterinary Medicine, then

2. Follow the steps on page 16 to have the LA Board of Pharmacy make the necessary changes to that person's CDS license, then

   -- ONLY AFTER STEPS #1 and #2 ARE COMPLETE ---

3. Contact Robin Hogue with the DEA Diversion Control Division to remove the former person on the shelter's DEA registration and request to have the new DVM, "designated" CAET or Lead CAET added to the shelter's DEA registration.

   The DEA will verify with the LBP to ensure the new person to be listed on the DEA registration is properly classified with the LA Board of Pharmacy before adding his/her name to the DEA Registration.

CONTROLLED SUBSTANCE RECORDS

FOR DEA REGISTERED CAETS

The **Code of Federal Regulations** (CFR) can be found on the DEA's Diversion Control Division's website at www.ecfr.gov/current/title-21/chapter-II.

1. PHYSICAL INVENTORIES

Inventory all Sodium Pentobarbital and other controlled substances on hand. Indicate on the inventory if the inventory is taken at the beginning or the close of business. Use a separate inventory sheet per drug agents kept at the facility.

A. INITIAL INVENTORY - Take your first (initial) inventory when first obtaining a DEA registration. Usually this inventory is "zero" Sodium Pentobarbital or controlled substance on hand. *{reference CFR §1304.11(b) - Inventory requirements}*

B. QUARTERLY INVENTORY - Take an inventory every three months and record in the logbook (page 47, exhibit #2 - sample). Use a separate inventory sheet per drug agents kept at facility.

C. BIENNIAL INVENTORY **-** After the initial inventory is taken, the registrant shall take a new inventory of all stocks of controlled substances on hand at least every two years. The biennial inventory may be taken on any date which is within two years of the previous biennial inventory date. *{reference CFR §1304.11(C) – Biennial Inventory}*

2. ORDERS

For instructions on placing orders and receiving orders, please carefully review the DEA Form 222 Instructions on page 52, exhibit #6b.

All other controlled substances, such as telazol and ketamine, are to be ordered by way of written invoice or purchase request to the distributor/supplier. A copy of the invoice/purchase request must be kept for your records. The date and amounts received must be logged on your copy of the invoice/purchase request. These controlled substances can only be order for the facility through the Board designated Lead CAET or the Louisiana licensed veterinarian associated with the facility.

3. USAGE LOG

KEEP A SEPARATE USAGE LOG FOR EACH PERSON USING SODIUM PENTOBARBITAL OR OTHER CONTROLLED SUBSTANCES. Keep your log in a separate, preferably bound, dispensing/utilization ledger (page 46 - exhibit #1 and page 50 – exhibit #5). A running, perpetual inventory must be documented in the usage log (page 49, exhibit #4 - sample).

4. RETURNS OF DRUGS TO SUPPLIERS

A. If you need to return sodium pentobarbital to a supplier or transfer it to another DEA registrant, you must have the registrant or supplier fill out a DEA 222 order form (page 51, exhibit #6 – sample). Both parties (you and them) must keep a copy of the order form.

B. Sodium Pentobarbital (or any schedule II drug) is returned using the DEA 222 order forms. If you need to return schedule III controlled substances, you must create an invoice containing the following information:

(1) name and address of both parties (yourself and recipient);

(2) both parties' DEA number;

(3) date of return or transfer;

(4) name of drug being returned or transferred;

(5) strength of drug being returned or transferred; and

(6) amount of drug being returned or transferred.

Both parties must keep a copy of the return/transfer invoice on file.

5. DESTRUCTION OF DRUGS

§ 1317.90 - Methods of Destruction

CFR §1317.90(a) - All controlled substances to be destroyed by a registrant, or caused to be destroyed by a registrant pursuant to §1317.95(c), shall be destroyed in compliance with applicable Federal, State, tribal, and local laws and regulations and shall be rendered non-retrievable.

CFR §1317.90(b) - Where multiple controlled substances are comingled, the method of destruction shall be sufficient to render all such controlled substances non-retrievable. When the actual substances collected for destruction are unknown but may reasonably include controlled substances, the method of destruction shall be sufficient to render non-retrievable any controlled substance likely to be present.

CFR §1317.90(c) - The method of destruction shall be consistent with the purpose of rendering all controlled substances to a non-retrievable state in order to prevent diversion of any such substance to illicit purposes and to protect the public health and safety.

§ 1317.95 - Destruction procedures

The destruction of any controlled substance shall be in accordance with the following requirements:

(a) Transfer to a person registered or authorized to accept controlled substances for the purpose of destruction. If the controlled substances are transferred to a person registered or authorized to accept the controlled substances for the purpose of destruction, two employees of the transferring registrant shall load and unload or observe the loading and unloading of any controlled substances until transfer is complete.

(b) Transport to a registered location. If the controlled substances are transported by a registrant to a registered location for subsequent destruction, the following procedures shall be followed:

(1) Transportation shall be directly to the registered location (the substances shall be constantly moving towards their final location and unnecessary or unrelated stops and stops of an extended duration shall not occur);

(2) Two employees of the transporting registrant shall accompany the controlled substances to the registered location;

(3) Two employees of the transporting registrant shall load and unload or observe the loading and unloading of the controlled substances until transfer is complete;

(c) Transport to a non-registered location. If the controlled substances are transported by a registrant to a destruction location that is not a registered location, the following procedures shall be followed:

(1) Transportation shall be directly to the destruction location (the substances shall be constantly moving towards their final destruction location and unnecessary or unrelated stops and stops of an extended duration shall not occur);

(2) Two employees of the transporting registrant shall accompany the controlled substances to the destruction location;

(3) Two employees of the transporting registrant shall load and unload or observe the loading and unloading of the controlled substances;

(4) Two employees of the transporting registrant shall handle or observe the handling of any controlled substance until the substance is rendered non-retrievable; and

(5) Two employees of the transporting registrant shall personally witness the destruction of the controlled substance until it is rendered non-retrievable.

(d) On-site destruction. If the controlled substances are destroyed at a registrant's registered location utilizing an on-site method of destruction, the following procedures shall be followed:

(1) Two employees of the registrant shall handle or observe the handling of any controlled substance until the substance is rendered non-retrievable; and

(2) Two employees of the registrant shall personally witness the destruction of the controlled substance until it is rendered non-retrievable.

The form for destruction is DEA Form 41 (page 53, exhibit #7). **Shelters must keep originals** and return copies to the DEA.

6. THEFT OF DRUGS *{reference CFR §1317.76}*

The registrant shall notify the Field Division Office of the Administration in his area, in writing, of the theft or significant loss of any controlled substances within one business day of discovery of such loss or theft. The registrant shall also email directly and immediately to nofd.theftorloss@dea.gov to report theft.

7. LEAVING YOUR JOB

IF YOU QUIT - A CAET or Lead CAET who is leaving employment at the shelter **MUST** return their DEA certificate and any unused DEA order form 222s to the DEA. The Sodium Pentobarbital previously obtained by the CAET leaving must be transferred to another DEA registrant *(using a DEA 222 order form as described in #4 above)* or by contacting the DEA for instructions on drug destruction *(*see item #5 above)*. Other controlled substances must be transferred to another DEA registrant using an invoice as described in #4.B above. The Controlled Dangerous Substance (CDS) license of the CAET leaving must be returned to the Louisiana Board of Pharmacy.

If another licensed CAET is working at the shelter, they can request the existing DEA number of the departing CAET be transferred to their name and Louisiana Board certificate number. If the departing CAET is also designated as the facilities Lead CAET for obtaining other controlled substances for capture purposes, the new CAET must receive designation by the Louisiana Board of Veterinary Medicine as the new Lead CAET. The new CAET must request new DEA 222 order forms. The sodium pentobarbital and other controlled substances could then be transferred to their name. The CDS license number must also be changed to the new CAET name.

8. CHANGING THE SHELTER'S ADDRESS

Any shelter, registered with the DEA, which moves, MUST send a letter to the DEA to change the address of the CAET or veterinarian registered at the shelter. The letter must include the old address, new address and shelter name. The name of the CAET or veterinarian, their DEA registration number and signature must be included. Since the Board of Pharmacy may need to inspect the new site before issuing a new CDS license, please notify their office as soon as new location is confirmed. Contact the LA Board of Pharmacy and the DEA for more details and instructions.

9. STORAGE

Sodium pentobarbital and other controlled substances must be stored in a securely locked, substantially constructed cabinet, or safe. Access to the sodium pentobarbital should be given to only those individuals who are certified by the Louisiana Board of Veterinary Medicine to euthanize animals. Access to controlled substances for animal capture should be given to only those individuals who have attended and passed a chemical capture training course approved by the Louisiana Board of Veterinary Medicine. The cabinet or safe must remain locked when not in use so as to limit the accessibility to the drug.

10. WHO NEEDS A DEA NUMBER?

Not all CAETs will need to register with the DEA and LBP. A shelter can be registered under one or more veterinarians, or under the name of one CAET for the purchase and maintenance of sodium pentobarbital or one Lead CAET for the purchase and maintenance of sodium pentobarbital and other controlled substances for capture purposes. LBP will allow only one CAET or one Lead CAET to be registered at a shelter if there are no veterinarians registered at the shelter. The registered veterinarian(s) or CAET is responsible for purchasing and properly maintaining the shelter’s sodium pentobarbital for euthanasia. The registered veterinarian(s) or Lead CAET is responsible for purchasing and properly maintaining the shelter’s controlled substances for the use in animal capture as well as sodium pentobarbital for euthanasia. However, all Board certified CAETs at the facility may administer sodium pentobarbital for the purpose of animal euthanasia, and all properly trained animal capture officers may administer capture drugs for the purpose of animal capture and restraint.

11. HOW LONG DO YOU KEEP RECORDS

Five (5) previous years and the current calendar year.

HUMANE EUTHANASIA

The term euthanasia is derived from the Greek terms eu meaning good and thanatos meaning death. A "good death" would be one that occurs with minimal pain and distress. Euthanasia techniques should result in the rapid loss of consciousness followed by cardiac or respiratory arrest and the ultimate loss of brain function (death). These techniques should minimize distress and fear prior to the loss of consciousness.

Pain is an interpretation of nerve impulses by the brain. If the brain function is depressed, the ability to "feel" pain is also greatly reduced or even absent. Anesthesia produces such a result. While you are not anesthetizing animals, your goal is to minimize pain and fear during the process of euthanasia.

Requirements of euthanasia:

- Physical: rapid unconsciousness; cardiac or respiratory arrest; loss of brain function
- Mental: minimal fear or stress; painless
- Personnel: technically proficient

General considerations of humane euthanasia:

- Loss of consciousness and death without pain or distress
- Unconsciousness induced quickly
- Reliability
- Safety to personnel
- Irreversibility
- Dampens emotional effect on observers
- Drug availability and abuse potential
- Age, health and species limitations
- Modes of action: hypoxia; direct depression of life-sustaining neurological pathways; physical disruption of brain activity.

Identifying stress:

- Changes in normal behavior
- Vocalization
- Passiveness
- Aggression

Minimizing animal stress:

- Quiet location
- Gentle restraint: careful handling and talking
- Chemical restraint: acepromazine, Rompun (Xylazine), Domitor

In this course, we will be focusing on euthanasia induced by Sodium Pentobarbital (SP).

Because the drug that is legal for use for humane euthanasia in the state of Louisiana is a barbiturate, it is similar to some anesthetic agents. The phases that an animal experiences are similar to those experienced in anesthesia.

- **Stage 1 - Voluntary excitement**
  When the animal first experiences the effects of the drug, there is a period of physical excitement
- **Stage 2 - Involuntary excitement**
  This is the most important stage to recognize; it indicates the appropriateness of the dosage.

  The animal may have a bowel movement, urination, stiffening of limbs, vomiting. It is important to properly dose the animal so that this stage is very short. Under dosing will prolong this stage: the most common causes are errors in calculating that amount of drug and injecting the drug outside a vein.
- **Stage 3 - Anesthesia**
  There is a loss of the blink reflex, and a loss of response to pain stimuli.
- **Stage 4 - Death**
  This stage starts with the slowing of the respiratory rate (breathing) and ends with cardiovascular failure and death.

Louisiana law prescribes that the only legal concentration of sodium pentobarbital allowed for euthanasia is 6 grains (390 mg) per ml or cc. The drug must be labeled "For Euthanasia Only".

** SEE DOSAGE CHART in Figure #5 on page 58 **

- Sodium pentobarbital is usually administered IV (intravenously)
- Intraperitoneal (IP) route is appropriate in neonates (baby animals) (difficulty of getting a needle into a vein)
- Other routes are not considered appropriate in awake animals:
  1. Intracardiac (IC)
  2. Intrahepatic (IH)

***NOTE**: It is **ILLEGAL** in Louisiana to administer SP via the intracardiac route in an awake animal.*

- SP depresses the central nervous system (brain) and eventually breathing stops
- The advantages of this drug are the speed of action, the smoothness of induction, and the cost
- The disadvantages are that IV injection is usually required (difficult at times), the drug is a controlled substance, and there can be some unpleasant agonal responses.
- SP is the preferred method of euthanasia for domestic species
- Recommended doses for small mammals (dog or smaller)

Route	Dosage	Unconsciousness	Death (minutes)
IV	1 ml/10 lbs	3-5 sec	5
IP	3 ml/10 lbs	3-5 min	30
ORAL	3 ml/10 lbs	5-40 min	30-120
IC	1 ml/10 lbs	2-3 sec	1-3
IH	2 ml/10 lbs	5 sec	5

INJECTION SAFETY ISSUES:

- Animal handling and restraint
- Needle and clipper injuries
- Drug exposure
- Animal bites and scratches
- Medical waste

Techniques for administering sodium pentobarbital via the various routes

1) Have all necessary equipment assembled:
    - Syringe with swaged-on needle or luer-lock needle (20 or 22 gauge x 1 “);
    - Clippers;
    - Alcohol and cotton balls;
    - Tourniquet.

2) Verify the identity of the animal.

3) Obtain or estimate the body weight of the animal.

4) Load the syringe with the appropriate dose.

If INTRAVENOUS…

Restraint of the animal

a) Safety first!! **ALWAYS** muzzle a dog which appears to be aggressive.

b) Use a loop or squeeze techniques for very aggressive or feral animals.

c) Once under control, chemical restraint should be used in aggressive animals before attempting IV injection technique. Again, xylazine (Rompun®), acepromazine, or medetomidine (Domitor®) are approved.

Drug	Dosage
Xylazine (Rompun®)	1 cc LA/100 lbs; 1 cc SA/40 lbs
Acepromazine	1 cc/20 lbs
Medetomidine (Domitor®)	1cc/40 lbs

INJECTION TECHNIQUE

a. Dogs

1. Cephalic IV injection

- Assistant stands on the side opposite the leg to be injected
- Assistant restrains the dog's head with the near arm under the dog's neck, pulling the dog's head tight against his shoulder.
- Assistant reaches across the dog's back and holds the vein with thumb at the dog's elbow.
- Technician gently pulls the skin of the leg toward the foot. He then feels for the vein and tries to visualize it. Alcohol may help in visualizing the vein. Pumping the foot may help to engorge the vein.
- IF THE VEIN CANNOT BE FELT OR SEEN, DO NOT ATTEMPT THE INJECTION.
- The cephalic vein divides at the level of the carpus (wrist). It is best to make the initial stick in the vein just above the division of the vein (i.e. above the wrist). This will allow room further up the leg for a second attempt if the first attempt fails.
- With the bevel up, insert the needle through the skin. Draw plunger back slightly. If the needle is correctly placed, there will be a blood flash in the needle hub. If blood is not seen in the hub, DO NOT INJECT. This is true for all intravenous injections.
- If there is no blood evident, try repositioning the needle by pulling it 3/4 of the way out, repositioning the needle, then inserting the needle again. Repeat the process of drawing the plunger and looking for the blood flash.
- With the needle seated in the vein, have the Assistant release their thumb hold on the vein (while retaining control of the elbow). Inject the SP quickly into the vein. If the drug is outside of the vein (causing a bleb), stop injecting.

2. Lateral saphenous IV injection

- Assistant lays dog on its side, standing at the dog's back. One arm is on the neck, holding the lower leg with the hand.
- Assistant grasps the upper rear limb at the stifle (knee), extending the leg. The vein is held off by rolling the skin to the back.
- Technician stretches the vein and inserts the needle usually above or below the Achilles tendon.

If INTRACARDIAC…

Remember that this route may only be used on **unconscious** animals!

1. Weight the dog and calculate the dose of sodium pentobarbital. Use the same dose as you would for IV administration (1 ml or cc/10 lbs body weight). **USE A 1 ½ " NEEDLE**.
2. With the dog lying on its side, find the area where the heartbeat is strongest (use either a stethoscope or your hand). Usually, the area is just behind the elbow with the leg in a normal position.
3. Insert the needle through the skin of the chest wall and into the heart. If the needle is correctly placed, the syringe will move with the heartbeat. Draw plunger back slightly. If the needle is correctly placed, there will be a blood flash in the needle hub. If there is no blood in the hub, withdraw the needle completely and reattempt the stick.
4. Once the blood flash is seen, inject the drug.

If INTRAPERITONEAL/INTRAHEPATIC…

1. This route is often used in cats and neonatal (baby) animals. An assistant may be used to scruff/stretch a docile cat; if the cat is aggressive/feral, other types of restraint must be used (no assistant!).
2. Weight the animal and calculate the proper dosage of sodium pentobarbital. Use the same dose as you would for IV administration (3 ml or cc/10 lbs body weight).
3. Locate the bottom of the sternum (breast bone).
4. Starting ½ inch below the sternum, insert the needle straight into the abdomen. If the intraperitoneal route is used, there should be no blood flash and no resistance to the injection.
5. If attempting intrahepatic injection, the needle should be angle at a 45° angle to the long axis of the body (with the needle directed toward the head of the animal). When the plunger is drawn, a blood flash should be seen in the hub.
6. After injecting the SP, the patient is placed in a quiet place (cage). It is common for death to occur in as long as 15 minutes or more with intraperitoneal administration. Intrahepatic administration causes death in 5 minutes.

Verifying Death

No matter which route of sodium pentobarbital administration is used, the animal's death must be verified.

The primary signs are:

1. Absence of breath/breathing
2. Absence of heartbeat (use stethoscope)

The secondary signs are:

1. Absence of the blink reflex when the cornea (eye) is touched.
2. Pupils stay dilated when a light is shined in them. The pupils do not constrict.

Special Notes

- **Always** let someone at the shelter know that you are performing euthanasia in case of an accident (accidental injection, animal bite).
- **Always** make sure that you are using sharp needles. This makes the injection much easier and less painful for the animal.
- **Complete** all paperwork according to the shelter's protocol.
- **Properly** dispose of the animal's carcass.
- **Properly** dispose of all used needles and syringes according to the shelter's protocol.
- **Realize** that sodium pentobarbital may cause some side effects (even after death). These can be: agonal breathing (gasping that occurs post-mortem); vocalization; muscle contractions or fasciculation. These can be disturbing to the humans involved, but the animal is unconscious or expired when these symptoms occur.

BIBLIOGRAPHY

AVMA Guidelines on Euthanasia, June 2007

The Humane Society of the United States Euthanasia Training Manual, Rebecca Rhodes, 2002

Euthanasia Training Course, Keith Branson

CAET Training Course Handbook, Brett Berryhill, 2002.

STRESS MANAGEMENT

Anyone who works in or cares about animal protection must eventually face the fact that millions of dogs and cats must be euthanized each year because there are no homes for them. No one is happy about this; however, we realize it is a necessary kindness to euthanize unwanted animals. Most of you become animal care workers to make a difference; however, there are many days that you have difficulty seeing the "difference".

There are many stressors related to the work that you do either in Animal Control or a Humane Society. Perhaps the most intense stress comes with the task of euthanasia; this probably goes without saying for many of you. Dealing with the public whether directly or indirectly is indeed another stress. Many of you can name other daily stresses associated with your job including office politics, understaffing, or perhaps a perceived lack of support.

All of us have to deal with stress at times, but more serious problems arise when the stress is a regular part of a person's day. In recent research, shelter workers report euthanasia related stress and relate symptoms including nightmares, depression, loss of sleep and difficulty concentrating. It is important to accept that a strong reaction to a distressing situation is normal. Some of these reactions include the following:

- Acting out, by expressing unfocused hostility or engaging in substance abuse and other addictive behaviors;
- Acting in, feeling depression, isolation and disassociation, nightmares, an increased startle response, a feeling of hopelessness, physical illness and suicidal thoughts.

Animal Control is a high-trauma profession and as a result self-care is very important. The traditional stoic attitude toward shelter killing is a major contributing factor to many stress disorders. Unfortunately, people mistake mental toughness for mental fitness. The stress response has much to do with grief; the grief we feel for the unwanted animals and their impending death. Anticipatory grief is our response to a known fatal outcome. For many shelter workers, anticipatory grief makes their hearts heavy most of the time. It isn't something that goes away. These caretakers are keenly aware that the animals they are working with have suffered abandonment and may suffer euthanasia. This chronic and long-term grief complicates the grief process, making it harder to cope.

Grief is further complicated when it is not socially supported. This is called "disenfranchised grief" and occurs when our culture fails to provide rituals for the expression of certain losses. There are not established rituals to mourn the losses you experience daily/weekly. Society, in fact, often speaks out against your efforts with no solutions. To keep the grief related stress in perspective we must remember that grief is a healthy emotion and honors the one for whom we grieve - so make it positive. Think of ways to recognize your grief and that of coworkers. Perhaps a day of remembrance for all animals lost could be instituted. Be creative and try to involve everyone.

Animal Care workers in the animal control environment meet with chronic stress. If not dealt with appropriately, chronic stress can lead to decreased productivity loss of interest in work and other activities and diminished ability to enjoy oneself under any circumstances. Instead of bouncing back from particularly stressful situations, a person is more vulnerable to them and plays them over and over in his/her mind. These responses result in burnout, compassion fatigue, and substance addictions. Burnout is a process including gradual exposure to job strain, erosion of idealism and a void of achievements. Compassion Fatigue is the "cost of caring"; the result of an intense anxiety reaction to a stressful event that goes beyond a person's ability to cope and to defend against coupled with caring for others and not replenishing self. Compassion fatigue does not have to be cumulative; it can happen instantaneously. Prolonged stress may also lead to various health problems.

Stress is an inherent part of the animal care worker's daily work; accordingly, managing this stress should also be a part of the daily routine. To manage stress, you must first identify the stressors. Don't limit the identification to only the major situations like euthanasia but look at the little incidents that get to you. Notice how you deal with these situations. Do you avoid or deny the situation? Do you laugh it off? Or do you confront stressful situations? Once you've identified the stressors and your reactions to them, assess how well each of your reactions work for you. Second, it is very important to identify people around you who can offer support, both on the job and at home. It is critical to have a couple of people you can talk to and whose advice you trust.

Knowing the stressors and your reactions are the first step, but once identified it's time to make changes. When looking at the stressors consider direct solutions. For example, perhaps rotating the schedule, changing physical conditions and surroundings, or obtaining better skills in working with the public would prove helpful. Look farther than work; assess your lifestyle. Are you balancing work with time off? Are you able to enjoy yourself? Make sure that you are exercising, eating and sleeping adequately. Are your priorities straight? Are you using your time off the way you really want to?

You need to take care of yourself at work and at home. Here are some de-stressing ideas: regular debriefings, journaling, drawing, painting, massage, aromatherapy, exercise, progressive relaxation, nature contact, utilizing vacation time, changing work routines, having fun, laughing.

Some of you will want to really get involved to make a difference beyond your daily routine. Engaging in some activity that changes the situation or gives support for the next event can be cathartic. You can work to change laws, educate police and social service professionals about the importance of reporting animal abuse, or set up support groups.

Finally, take stock of your work. Regain and repeat to yourself the positives that show the good that you do, that remind you of the reasons you went into this work in the first place. DO THIS DAILY!

HUMAN SAFETY DO'S & DON'TS

CAET:

Do: Let someone know euthanasia has begun or have times scheduled for the task.

Do: Have all paperwork, equipment, etc. ready and organized.

Do: Wear gloves if you wish (disposables) and wash your hands after euthanasia is complete.

Animals:

Do: Realize that because you handle so many animals in a close setting, you are more prone to being bitten or injured than most people.

Do: Understand that the animals you deal with are sometimes scared, nervous, and away from home and master/mistress. Their normal defense mechanisms result in them biting, scratching, snarling, etc. to avoid restraint or capture.

Don't: Exercise less caution with the animal being made ready for euthanasia, than was used at the time of impoundment.

Euthanasia Equipment:

Do: Use appropriately sized syringe and needle size.

Do: Realize that the hypodermic needles are **VERY SHARP**.

Don't: Forget to keep the needle cover on until the last moment.

Don't: Use dull needles, needles with burrs, etc. Use only sharp needles with no clots or blockages.

Electric Clipper:

Do: Remember the clipper is electric, and a hazard around water.

Do: Keep the blades sharp, lubricated, and cooled.

Don't: Use a clipper with broken blades and teeth missing, as this may gouge the animals.

Don't: Use a clipper with a cracked or broken barrel, as this may expose the electrical portions inside.

Sodium Pentobarbital:

Do: Realize that Sodium Pentobarbital is extremely irritating and can cause death of the tissue it contacts.

Don't: Inject the drug before the needle is in the vein as it causes pain and the animal will react accordingly.

Do: Seek medical attention if by accident you inject yourself by mistake.

Do: Flush your eyes with large amounts of water if Sodium Pentobarbital get sprayed into them. Sodium Pentobarbital can cause severe damage to sensitive eye tissue. After flushing, seek medical attention as soon as possible.

Euthanasia Policy & Procedures:

Do: Have a clearly defined, written policy regarding euthanasia that is understood by all employees.

Do: Conduct periodic formal training sessions for employees.

Do: Have a good communication between the restrainer and the injector.

Do: Report any incidents or accidents to a supervisor, so the problem can be identified and eliminated.

Disposal:

Do: Dispose of needles, syringes, etc. In a safe, environmentally sound manner, eg. Sharps box, plastic milk jug, hazardous waste container.

Don't: Throw materials in the regular garbage.

Euthanasia Stress:

Do: Implement stress relievers as discussed under the stress management lecture.

Don't: Make one individual do all the euthanasia. Rotate duties, including animals selection, euthanasia, unloading, and disposal.

Do: Separate the sorrow from the guilt. Feel sorry for the animals, but do not ever feel guilty for what has to be done.

SHELTER WORKER'S CREDO

* We hereby promise to love and to care for the pets brought into our shelter to the best of our ability.

* We promise to make them as comfortable as possible in an impossible situation.

* We promise to do our best to find the adoptable ones responsible new homes.

* When all else fails, we promise to end their lives humanely in order to make room for the endless supply of animals to follow.

HOWEVER, we also stand firm with the following:

* WE DID NOT CAUSE THESE ANIMALS TO BE BORN INTO THIS PET-OVERPOPULATED WORLD.

* WE DID NOT CAUSE THESE PETS TO BECOME A PROBLEM OR INCONVENIENCE TO THEIR OWNERS.

* WE DID NOT DUMP THESE ANIMALS ON THE SIDES OF THE ROADS, FAIL TO SEARCH FOR THEM IF THEY BECAME LOST, OR NOT PUT IDENTIFICATION ON THEM.

* WE DID NOT CAUSE THEIR OWNERS TO MOVE, TO HAVE KIDS, OR TO BECOME ALLERGIC TO THEM.

* WE DID NOT ALLOW THESE PET ANIMALS TO BECOME ILL DUE TO INADEQUATE IMMUNIZATIONS FOR PREVENTABLE DISEASES.

* WE WILL NOT ACCEPT THE GUILT NOR ALLOW ANY BLAME TO BE PLACED ON US FOR CARING ENOUGH TO WORK AT A SHELTER THAT EUTHANIZES ANIMALS.

* WHEN THAT "MAGICAL HOME IN THE COUNTRY" CANNOT BE FOUND AND THE ANIMAL IS HUMANELY EUTHANIZED……

IT IS NOT YOUR FAULT!!

HEALTHCARE PROFESSIONALS' FOUNDATION OF LOUISIANA (HPFLA)

The LBVM is committed to its charge to promote the public health, safety, and welfare by safeguarding the people of this state against incompetent, dishonest, or unprincipled practitioners of veterinary medicine, including DVMs, RVTs, and CAETs. In short, the Board's ultimate responsibility is the protection of the public through its regulatory powers. And while action against an impaired licensee can be taken by the Board through disciplinary procedures, the Board feels that a healthy licensee is an important first step towards ensuring its mission in protecting the public is successfully achieved. The Board can, and is quite willing to, lawfully support the recovery and practice of those professionals and paraprofessionals who are cooperative and willing to receive assistance, and still properly discharge its duty of protecting the public. As such, of great importance to the Board was reviving its Peer Assistance Program.

The Board announced in 2021 its new partnership with the Healthcare Professional's Foundation of Louisiana (HPFLA). HPFLA has been contracted by the Board to provide the necessary assistance to Louisiana's licensed veterinarians, registered veterinary technicians and certified animal euthanasia technicians who are impaired by chemical dependency on drugs or alcohol or by mental illness. HPFLA is non-profit organization that provides confidential services to various licensing boards and licensees in the healthcare industry. They offer a voluntary advocacy and monitoring program that allows licensees with impairments or in need of medical treatment to possibly avoid formal disciplinary actions by their licensing boards and obtain remediation in order to practice with skill and safety.

The primary role of the HPFL Professionals' Health Program (PHP) is to offer assistance to health care professionals and paraprofessionals who may be suffering from difficulties such as substance use issues, depression, anxiety, etc., in addition to a host of physical ailments and disruptive behavioural patterns. There are a few different avenues for one to gain access to HPFLA's services, the first of which is through self-reporting. If a licensee feels they are impaired and need assistance, help is available. Simply call the HPFLA. A referral can also be made by an outside party if someone knows or suspects that a licensee is impaired. LBVM Board Members are not notified of self-referrals or third-party referrals. Lastly, if a formal complaint is submitted to the Board in which a licensee is alleged to be impaired, rather than immediately disciplinary proceedings going forward, the Board has the option of first referring the alleged impaired licensee to HPFLA for an evaluation and assistance.

For more information on the Healthcare Professional's Foundation of Louisiana and its services, visit www.hpfla.org or call at 888-743-5747.

Exhibits
&
Figures

EXHIBIT #1

PAGE_____of_____

CONTROLLED SUBSTANCE/DRUG USAGE LOG

CHEMICAL AGENT _____

Bottle Lot # and Bottle # (after dash) _____ – _____ **CAET Assigned to Bottle** _____

NAME OF FACILITY _____ ADDRESS OF FACILITY _____

_____

Beginning Amount in Bottle				(units) *CC's*			
Date	Amount Used (units)	Amount Lost Spillage (units)	Amount Remaining in Bottle (units)	Animal Tag # or Description Including species, breed, color, sex, est weight	Person Administering	Spillage Witness	Lead CAET

EXHIBIT # 2

NAME OF SHELTER OR ANIMAL CONTROL CENTER:

LSU Animal Shelter

QUARTERLY INVENTORY LOG OF CONTROLLED SUBSTANCE/DRUG

CHEMICAL AGENT: Sodium Pentobarbital

Months Covered for this Inventory: June, July, August

Amount Ordered/Received: 800 (units) cc

Amount on Hand: 650 (units) cc

Amount Used for Capture/Restraint/
Euthanasia: 150 (units) cc

Amount Lost Due to Spillage: 1 (units) cc

Amount Lost Due to Expiration: 0 (units) _____

DATE PREPARED: 9/1/98

TIME PREPARED: [Beginning of Business] OR ~~Close of Business~~

SIGNATURE OF CAET: John Doe

Printed Name of CAET: John Doe

EXHIBIT # 3

SODIUM PENTOBARBITAL SIGN OUT SHEET

Date	# of Bottles Purchased	Bottle #	Lot #	Assigned To	Balance Remaining
06/24/98	*4*	*1*	*12345*	John Doe	*3*
		2	*12345*	John Doe	*2*

EXHIBIT # 4

PAGE _____ of _____

SODIUM PENTOBARBITAL USAGE LOG

NAME OF FACILITY *LSU Animal Shelter*

ADDRESS OF FACILITY *South Stadium Drive*

Baton Rouge

Bottle Lot # and Bottle # (after dash) *12345-1* **CAET Assigned to Bottle** *John Doe*

Beginning Amount in Bottle *100* **CC's**

Date	CC's Used	CC's Lost: Spillage	CC's Remaining in Bottle	Animal Tag # or Description Including Species, Breed, Color, Sex	Person Administering	Spillage Witness
06/23/98	*1*	*0*	*99*	*Kitten #22*	John Doe	
06/24/98	*1*	*1*	*97*	*Dog #25*	John Doe	Jane Smith
06/24/98	*12*	*0*	*85*	*Dog #30*	John Doe	

EXHIBIT #5

CONTROLLED SUBSTANCE/DRUG SIGN OUT SHEET

CHEMICAL AGENT Sodium Pentobarbital

Date	# of Bottles Purchased	Bottle #	Lot #	Assigned To	Balance Remaining
6/4/98	4				4
6/4/98		1	12345	John Doe	3
7/14/98		2	12345	Jane Smith	2
7/31/98		3	12345	Joe Jones	1
8/15/98	4				5

DEA FORM-222

U.S. OFFICIAL ORDER FORMS - SCHEDULES I & II
DRUG ENFORCEMENT ADMINISTRATION

OMB APPROVAL No. 1117-0010

PURCHASER INFORMATION

REGISTRATION INFORMATION

REGISTRATION #:
REGISTERED AS:

SCHEDULES:
ORDER FORM NUMBER:
DATE ISSUED:

SUPPLIER DEA NUMBER:#

PART 2: TO BE FILLED IN BY PURCHASER

BUSINESS NAME

STREET ADDRESS

CITY, STATE, ZIP CODE

PART 1: TO BE FILLED IN BY PURCHASER

Print or Type Name and Title

Signature of Requesting Official (must be authorized to sign order form) Date

PART 3: ALTERNATE SUPPLIER IDENTIFICATION - to be filled in by first supplier (name in part 2) if order is endorsed to another supplier to fill.

ALTERNATE DEA #

Signature- by first supplier

OFFICIAL AUTHORIZED TO EXECUTE ON BEHALF OF SUPPLIER DATE

ITEM	NO. OF PACKAGES	PACKAGE SIZE	NAME OF ITEM	PART 5: TO BE FILLED IN BY PURCHASER NUMBER REC'D	DATE REC'D	PART 4: TO BE FILLED IN BY SUPPLIER NATIONAL DRUG CODE	NUMBER SHIPPED	DATE SHIPPED
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								

← **LAST LINE COMPLETED (MUST BE 20 OR LESS)**

EXHIBIT #6a

EXHIBIT #6b

Your local DEA office:

If you are *not* an ARCOS reporter, you are required to provide a copy of the executed order form to DEA (21 CFR 1305.13). You can email a copy of your order form to: dea.orderforms@usdoj.gov

INSTRUCTIONS FOR DEA FORM 222 (see Title 21 CFR Part 1305 for details)

1. Purchasers and suppliers who use this form must have an active DEA registration that is not expired, revoked, or suspended. Both parties must be registered to handle the schedule 1 and 2 controlled substance(s) on the order form.
2. In accordance with 21 CFR 1305.06, an order for Schedule I and II controlled substances, whether on a DEA Form 222 or an electronic order, may be filled only by a person registered with DEA as a manufacturer or distributor.
3. In accordance with 21 CFR 1305.06(c), a person registered to dispense Schedule II substances may distribute the substances to another dispenser with either a DEA Form 222 or an electronic order only in the circumstances described in 21 CFR 1307.11.
4. Do not make erasures or alterations. A defective order form may not be corrected; it must be replaced by a new order form to be accepted. A supplier who receives a form that is incomplete, illegible, improperly prepared, or shows any sign of alteration should return it to the purchaser with the reason for refusal. The purchaser must void all defective forms and keep on file for two years after the date of the order form.
5. Order forms must be maintained separately from all other records for two years. The original must be kept on file by the supplier that fills the order for two years.
6. Lost or stolen order forms must be documented and reported to your local DEA office. See 21 CFR 1305.16 for details.
7. Unused order forms should be voided and returned to Drug Enforcement Administration, PO Box 2639, Springfield, VA 22152-2639. See 21 CFR 1305.18 for details.
8. For additional order forms, call the Customer Service Center at (800) 882-9539 or place your request on-line at www.deadiversion.usdoj.gov or contact the local DEA office.

PART 1. PURCHASER INFORMATION

1. The purchaser fills out no more than twenty line items in this section. If more items are needed, use another form.
2. Only one item may be entered on a single line. Enter the number of packages, the size of the package, and the name of the item.
3. Enter the total number of line items ordered.
4. Incomplete order forms will be returned to the purchaser for completion before the supplier is allowed to fill it. See 21 CFR 1305.15 for details.
5. The form must be signed and dated by a person authorized to sign a registration application for the purchaser, or a person authorized to execute order forms for the purchaser by a power of attorney. An officer or agent signing on behalf of the purchasing registrant will indicate the signature authority immediately after the signature. For example, "attorney-in-fact", "by power of attorney", "designated agent", or "secretary" may be used.
6. The order form must be signed and dated by the purchaser on the day it is submitted for filling. Purchaser must make a copy of the order form for its records before mailing the original to the supplier.

PART 2. SUPPLIER IDENTIFICATION - Enter the DEA number, name, and address of supplier.

PART 3. ALTERNATE SUPPLIER IDENTIFICATION - An order form made out to a supplier who cannot fill all or part of the order within the time limitation may be endorsed to another supplier to fill. Enter the DEA number of the alternate supplier. The person authorized by the first supplier (named in part 2) to obtain and execute order forms must sign and date the endorsement. The first supplier must mail the original order form to the alternate supplier.

PART 4. CONTROLLED SUBSTANCE SHIPMENT

1. This section is filled out by the supplier who actually fills the order. If the original supplier endorses this order to another supplier, then the alternate supplier will fill out this section.
2. Enter the number of packages furnished on each line item and the date shipped. The order may be filled in partial shipments up to 60 days after the date of the order form if it cannot be immediately supplied.
3. The controlled substance(s) may only be shipped to the purchaser and address preprinted on the order form.
4. Supplier must keep the original order form available for inspection for a period of two years.

PART 5. CONTROLLED SUBSTANCE RECEIPT

1. The purchaser fills out this section on its copy of the original order form.
2. Enter the number of packages received and date received for each line item.
3. Purchaser must keep its copy of each executed order form and all copies of unaccepted or defective forms and any attached statements or other related documents available for inspection for a period of two years.

In accordance with the Paperwork Reduction Act of 1995, no person is required to respond to a collection of information unless it displays a valid OMB control number. The OMB control number for this collection is 1117-0010. Public reporting burden for this collection of information is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

EXHIBIT #7 – Download at https://www.deadiversion.usdoj.gov/21cfr_reports/surrend/41_form.pdf

OMB APPROVAL NO. 1117-0007 Expiration Date 1/31/2024

U. S. DEPARTMENT OF JUSTICE – DRUG ENFORCEMENT ADMINISTRATION

REGISTRANT RECORD OF CONTROLLED SUBSTANCES DESTROYED

FORM DEA-41

A. REGISTRANT INFORMATION

Registered Name:		DEA Registration Number:
Registered Address:		
City:	State:	Zip Code:
Telephone Number:		Contact Name:

B. ITEM DESTROYED

1. Inventory

	National Drug Code or DEA Controlled Substances Code Number	Batch Number	Name of Substance	Strength	Form	Pkg. Qty.	Number of Full Pkgs.	Partial Pkg. Count	Total Destroyed
Examples	*16590-598-60*	*N/A*	*Kadian*	*60mg*	*Capsules*	*60*	*2*	*0*	*120 Capsules*
	0555-0767-02	*N/A*	*Adderall*	*5mg*	*Tablet*	*100*	*0*	*83*	*83 Tablets*
	9050	*B02120312*	*Codeine*	*N/A*	*Bulk*	*1.25 kg*	*N/A*	*N/A*	*1.25 kg*
1.									
2.									
3.									
4.									
5.									
6.									
7.									

2. Collected Substances

	Returned Mail-Back Package	Sealed Inner Liner	Unique Identification Number	Size of Sealed Inner Liner	Quantity of Packages(s)/Liner(s) Destroyed
Examples	*X*		*MBP1106, MBP1108 - MBP1110, MBP112*	*N/A*	*5*
		X	*CRL1007 - CRL1027*	*15 gallon*	*21*
		X	*CRL1201*	*5 gallon*	*1*
1.					
2.					
3.					
4.					
5.					
6.					
7.					

Form DEA-41 *See instructions on reverse (page 2) of form.*

C. METHOD OF DESTRUCTION

Date of Destruction:	Method of Destruction:	
Location or Business Name:		
Address:		
City:	State:	Zip Code:

D. WITNESSES

I declare under penalty of perjury, pursuant to 18 U.S.C. 1001, that I personally witnessed the destruction of the above-described controlled substances to a non-retrievable state and that all of the above is true and correct.

Printed name of first authorized employee witness:	Signature of first witness:	Date:
Printed name of second authorized employee witness:	Signature of second witness:	Date:

E. INSTRUCTIONS

1. Section A. REGISTRANT INFORMATION: The registrant destroying the controlled substance(s) shall provide their DEA registration number and the name and address indicated on their valid DEA registration, in addition to a current telephone number and a contact name, if different from the name on the valid DEA registration.
2. Section B. (1) Inventory: This part shall be used by registrants destroying lawfully possessed controlled substances, other than those described in Section B(2). In each row, indicate the National Drug Code (NDC) for the controlled substance destroyed, or if the substance has no NDC, indicate the DEA Controlled Substances Code Number for the substance; if the substance destroyed is in bulk form, indicate the batch number, if available. In each row, indicate the name, strength, and form of the controlled substance destroyed, and the number of capsules, tablets, etc., that are in a full package (pkg. qty.). If destroying the full quantity of the controlled substance, indicate the number of packages destroyed (number of full pkgs.). If destroying a partial package, indicate the partial count of the capsules, tablets, etc. destroyed (partial pkg. count). If destroying a controlled substance in bulk form, indicate that the substance is in bulk form (form) and the weight of the substance destroyed (pkg. qty.). In each row, indicate the total number of each controlled substance destroyed (total destroyed).
3. Section B. (2) Collected Substances: This part shall be used by registrants destroying controlled substances obtained through an authorized collection activity in accordance with 21 U.S.C. 822(g). In each row, indicate whether registrant is destroying a mail-back package or an inner liner. If destroying a mail-back package, enter each unique identification number separated by a comma and/or as a list in a sequential range and total quantity of packages being destroyed. If destroying an inner liner, enter each unique identification number separated by a comma and/or as a list in a sequential range based on the size of the liners destroyed and the total quantity of inner liners being destroyed. In the case of mail-back packages or inner liners received from a law enforcement agency which do not have a unique identification number or clearly marked size, include the name of the law enforcement agency and, if known, the size of the inner liner or package. DO NOT OPEN ANY MAIL-BACK PACKAGE OR INNER LINER; AN INVENTORY OF THE CONTENTS OF THE PACKAGES OR LINERS IS PROHIBITED BY LAW AND IS NOT REQUIRED BY THIS FORM.
4. If additional space is needed for items destroyed in Section B, attach to this form additional page(s) containing the requested information for each controlled substance destroyed.
5. Section C. METHOD OF DESTRUCTION: Provide the date, location, and method of destruction. The method of destruction must render the controlled substance to a state of non-retrievable and meet all applicable destruction requirements.
6. Section D. WITNESSES: Two authorized employees must declare by signature, under penalty of perjury, that such employees personally witnessed the destruction of the controlled substances listed in Section B in the manner described in Section C.
7. You are not required to submit this form to DEA, unless requested to do so. This form must be kept as a record of destruction and be available by the registrant for at least two years in accordance with 21 U.S.C. 827.

Paperwork Reduction Act Statement: The information collected on this form is necessary for DEA registrants to record controlled substances destroyed in accordance with the Controlled Substances Act (CSA). The records that DEA registrants maintain in accordance with the CSA must be kept and be available, for at least two years, for inspection and copying by officers or employees of the United States authorized by the Attorney General. 21 U.S.C. 827. DEA estimates that it will take approximately 30 minutes to complete this form, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The completion of this form by DEA registrants that destroy controlled substances is mandatory in accordance with 21 U.S.C. 827. Please note that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Comments regarding this information collection, including suggestions for reducing the burden estimate, should be directed to the Drug Enforcement Administration, DEA Federal Register Representative/ODL, 8701 Morrissette Drive, Springfield, Virginia 22152.

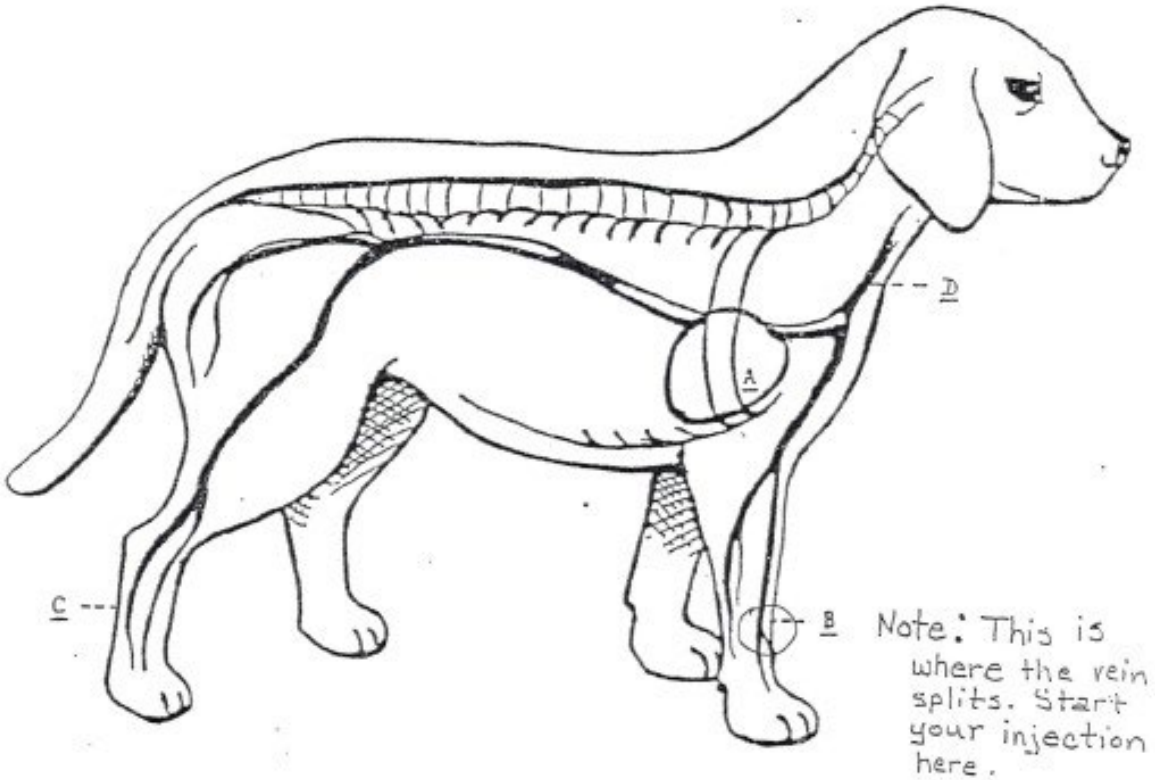
Save Print Reset

FIGURE #1

FIGURE BELOW:

This drawing shows the relative position of several features of the dog, including the heart, the cephalic vein in the front leg, and the lateral saphenous vein in the rear leg.

A - HEART
B - CEPHALIC VEIN
C - LATERAL SAPHENOUS VEIN
D - Jugular Vein



THE HUMANE SOCIETY OF UTAH (08/86) ARTWORK BY BRIAN JOHNSON

FIGURE #2

Figure to Right:

Assistant/holder restraining dog and occuling right cephalic vein for injection

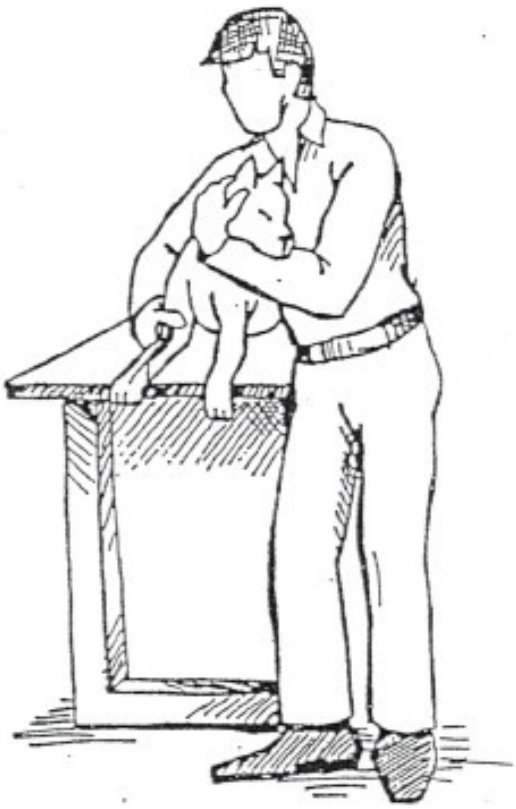


FIGURE #3

Figure to Right:

This is a close-up view of the right cephalic vein. This is the most commonly used vein for injection.

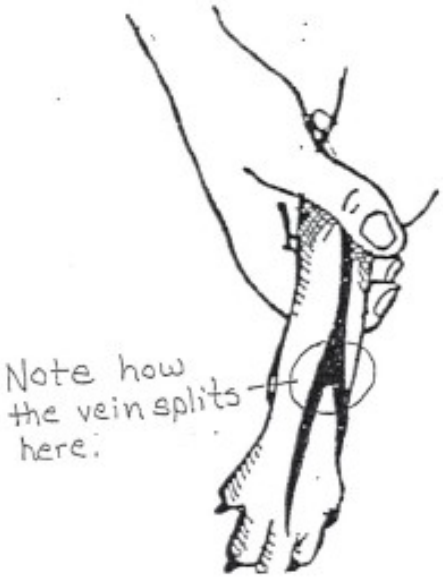
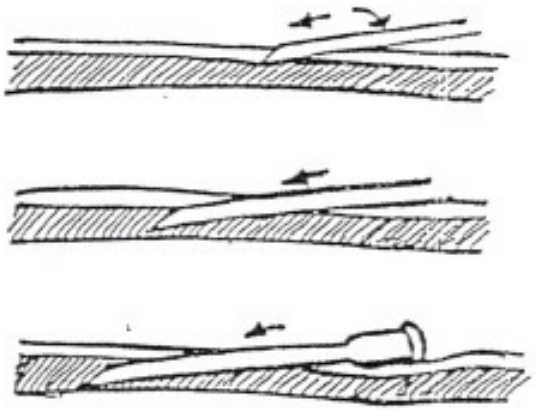


FIGURE #4

Figure to Right:

This is a representation of the correct angle to use when passing a needle through the skin and into the vein. The top view shows the needle entering the skin, with the needle held at a close angle to the skin. The center view shows the needle entering the vein. The lower view shows the needle being threaded into the vein prior to introducing the euthanasia solution into the vein.



THE HUMANE SOCIETY OF UTAH (08/86) ARTWORK BY BRIAN JOHNSON

FIGURE #5

SODIUM PENTOBARBITAL
6 gr per ml - for euthanasia only

DOSAGE CHART

	BODY WEIGHT	DOSAGE
	0 - 10 pounds	1.0 ml
	11 - 20 pounds	2.0 mls
	21 - 30 pounds	3.0 mls
	31 - 40 pounds	4.0 mls
	41 - 50 pounds	5.0 mls
	51 - 60 pounds	6.0 mls
	61 - 70 pounds	7.0 mls
	71 - 80 pounds	8.0 mls
	81 - 90 pounds	9.0 mls
	91 - 100 pounds	10.0 mls
	101 - 110 pounds	11.0 mls
	111 - 120 pounds	12.0 mls
	121 - 130 pounds	13.0 mls
	131 - 140 pounds	14.0 mls
	141 - 150 pounds	15.0 mls

NOTES:

1. Dosage is given in mls (milliliters).
2. 1 ml is the same as 1 cc.

DEFINITIONS

Applicant	Individual who has enrolled in the Louisiana Board of Veterinary Medicine's course to become a certified technician.
Background check	An investigation performed by the DEA.
CAET	Certified Animal Euthanasia Technician.
Certificate (or Certificate of Approval)	A certificate issued by the LBVM to indicate that an applicant has successfully completed all requirements to work as a CAET.
Controlled Dangerous Substance Program	A state agency (under LBP) which issues registrations to persons who qualify to order and/or possess dangerous (controlled) drugs.
Controlled drug	A scheduled drug which is monitored by the DEA
DEA	Drug Enforcement Administration.
DEA 222 order form	A special form to order controlled drugs. Forms are issued by DEA in the name of the registrant AND the shelter address where the registrant is employed and using the drug.
Department of Health and Hospitals	An agency of the State of Louisiana containing the Controlled Dangerous Substance Program
DHH	Department of Health and Hospitals
Direct supervision	Refers to a situation in which an unlicensed person performs technical actions with a veterinarian in the building.
Dosage	The amount of drug needed to euthanize an animal.
Drug Enforcement Administration	A federal agency which regulates the purchase, use, and inventory of dangerous (controlled) drugs.
DVM	Doctor of Veterinary Medicine
Euthanasia	The act of inducing death by chemical means.
Full certification	A regular certificate issued to technicians who have met <u>all</u> requirements, including a passing score on the Board-approved course and exams. Full certificates expire September 30 annual and must be renewed annually.
GED	General Equivalency Diploma which shows that applicant has completed high school curriculum.
Inventory	The act of counting all controlled substance/drugs on hand.
La.R.S.	Louisiana Revised Statutes
LBP	Louisiana Board of Pharmacy
LBVM	Louisiana Board of Veterinary Medicine

Lead CAET	CAET who has completed a board-approved course in chemical capture and who has been authorized by the employing facility and "designated" by the LBVM. Only one CAET at a facility may be designated as Lead CAET. The Lead CAET is responsible for the use, maintenance, and security of controlled substances/drugs used for restraint and chemical capture for the facility.
Logbook	A usage log
Louisiana Board of Pharmacy	A state agency charged with the regulation of the practice of pharmacy and with the licensing of pharmacists, pharmacies, and pharmacy technicians, in the State of Louisiana

LIST OF WHOLESALE DRUG DISTRIBUTORS

Anda, Inc.
2915 Weston Road
Weston FL 33331
954-585-1737

dba Butler Animal Health Supply, LLC
Butler Animal Health Supply, LLC
14800 FAA Blvd., #100
Ft Worth TX 7505076155
614-659-1680

Compounding Pharmacies of Louisiana
620 Guilbeau Rd, Suite A
Lafayette LA 70506
337-991-0101

D & H Wholesale Medical, Inc.
609 Willow Glen Dr
Ruston, LA 71270
318-251-3038

dba R & S Northeast LLC
Dixon-Shane, LLC
256 Geiger Road
Philadelphia PA 19115
215-673-3415

DPT Laboratories, Ltd.
5303 Distribution Drive
San Antonio TX 78218
210-476-8180

Fort Dodge Animal Health
3354 State Route 73 South
Wilmington OH 45177
937-382-8072

Genetco, Inc.
711 Union Parkway
Ronkonkoma NY 11779
631-585-1000

IVAX Pharmaceuticals, Inc.
100 Precision Drive
Walton KY 41094
859-485-8152

LA Wholesale Drug Co.
1611 Oliver Street
Monroe LA 71201
318-388-8850

Medisca, Inc.
661 Route 3, Unit C
Platsburgh NY 12901
518-563-4636

Merritt Veterinary Supplies, Inc.
1520 Pineview Road
Columbia SC 29209
803-695-1698

LIST OF WHOLESALE DRUG DISTRIBUTORS

Moore Medical Corporation
370 John Downey Drive
New Britain CT 06051
860-826-3640

Morris & Dickson Co., LTD.
410 Kay Ln
Shreveport, LA 71115
318-797-7900

dba NLS Animal Health
National Logistics Services, LLC
4700 Mercantile Drive North
Fort Worth TX 76137
817-625-7200

dba NLS Animal Health
National Logistics Services, LLC
2255 South Forbes Drive
Montgomery AL 36110
410-581-1800

PSS Wolrd Medical, Inc.
Southern Anesthesia & Surgical, Inc.
One Southern Court
West Columbia SC 29169
904-332-3000

Spark Drug, Inc.
336 St. George Ave
Jefferson, LA 70121
504-733-2311

dba VIP
Valmed Pharmaceutical, Inc.
8151 Peters Rd
Plantation FL 33324
954-382-7626

Vedco, Inc.
5503 Corporate Drive
St. Joseph MO 64507
816-238-8840

Webster Veterinary Supply, Inc.
3867 Pine Lane, Suite 201
Bessemer AL 35023
978-422-8211

LOUISIANA VETERINARY PRACTICE ACT

Louisiana Revised Statutes

37:1511-1534

Governing the Program for Certified Animal Euthanasia Technicians

(Last revised in February '22 – updates to complimentary sections of Wildlife and Fisheries and AVMA Principles)

*The **entire** LA Veterinary Practice Act can be found online at www.lsbvm.org/practice-act.*

LOUISIANA VETERINARY PRACTICE ACT [La. R.S. 37:1511-1534]

CERTIFIED ANIMAL EUTHANASIA TECHNICIANS [La. R.S. 37:1551-1558]

TITLE 37 - PROFESSIONS AND OCCUPATIONS
CHAPTER 18-B

CERTIFIED ANIMAL EUTHANASIA TECHNICIANS [La.R.S. 37:1551-1558]

§ 1551. Legislative intent

It is the purpose of this Chapter to provide the most humane restraint, capture, and death possible for unwanted and discarded animals, including those animals which are diseased or otherwise dangerous, by providing for the training and certification of euthanasia technicians.

Added by Acts 1987, No. 225, § 1. Amended by Acts 1999, No. 1369, §1.

§ 1552. Definitions

As used in this Chapter, the following words have the meaning ascribed to them in this Section unless the context clearly indicates otherwise:

(1) "Board" means the Louisiana Board of Veterinary Medicine.

(2) "Certificate of approval" means a certificate issued by the Louisiana Board of Veterinary Medicine to a certified animal euthanasia technician.

(3) "Certified animal euthanasia technician" or "CAET" means a person who is instructed in a board-approved program the proper methods of humanely euthanizing animals by injecting legal drugs in accordance with rules adopted by the Board, in proper security precautions, in proper record keeping, and related skills, and who has been issued a certificate of approval by the Board.

(4) “Lead CAET” means a CAET who is:

(a) Designated in documents submitted to the Board as the CAET at a designated site responsible for maintaining the security of those controlled substances in accordance with rules adopted by the Board for the sole purpose of restraining, capturing, and euthanizing animals, including records relating to controlled substances and drugs, in accordance with applicable state and federal laws; and

(b) Licensed and in good standing with the state controlled dangerous substances program and registered in good standing with the United States Drug Enforcement Administration; and

(c) Trained in a board-approved chemical capture training course.

(5) "Sodium pentobarbital" means a compound prepared or purchased solely as a euthanasia solution at a minimum strength of six grains per milliliter.

Added by Acts 1987, No. 225, § 1. Amended by Acts 1999, No. 1369, §1.

§ 1553. Application

In order to obtain a certificate of approval as a certified animal euthanasia technician the applicant shall comply with the following provisions:

(1) The applicant shall submit an application to the board.

(2) The applicant shall submit evidence of the applicant's good moral character.

(3) The applicant shall submit evidence that he has no felony record involving controlled dangerous substances.

(4) The applicant shall submit evidence that he:

(a) Has obtained a high school diploma or its equivalent.

(b) Has successfully completed a board-approved program in animal euthanasia, which shall include instruction in the proper methods of humanely euthanizing animals by injecting legal drugs in accordance with rules adopted by the Board, in proper security precautions, in proper record keeping, and related skills.

(5) The applicant shall pay the fee established by the board.

(6) The applicant shall submit any other information and proof that the Board may require by rule.

Added by Acts 1987, No. 225, § 1. Amended by Acts 1995, No. 431, § 1; 1999, No. 1369, §1.

§ 1554. Discipline of CAETs

A. After a hearing held in compliance with the Administrative Procedure Act, the board may deny, suspend or revoke the certificate of approval held by any technician or impose any other penalty authorized by this Chapter when it finds that the provisions of this Chapter or any of the rules and regulations adopted by the board are not being complied with or upon the grounds that the certified animal euthanasia technician has:

(1) Failed to carry out his duties.

(2) Abused the use of sodium pentobarbital or any controlled dangerous substance under state or federal law.

(3) Sold or given sodium pentobarbital or any controlled dangerous substance under state or federal law for recreational use.

(4) Stolen sodium pentobarbital or any controlled dangerous substance under state or federal law.

(5) Become a user of sodium pentobarbital or any controlled dangerous substance under state or federal law.

(6) Employed fraud, misrepresentation, or deception in obtaining a certificate of approval.

(7) Been declared insane or incompetent by a court of law.

(8) Been shown to suffer from chronic inebriation or habitual use of drugs.

(9) Been convicted of or entered a plea of nolo contendere to a felony or other offense involving moral turpitude or controlled dangerous substances under state or federal law.

(10) Performed duties of humanely retraining, capturing, or euthanizing animals in an incompetent or grossly negligent manner.

(11) Performed acts of cruelty upon animals

(12) Violated rules of professional conduct as defined in regulations adopted by the Board.

(13) Employed fraud or dishonesty in connection with his practice as a certified animal euthanasia technician.

(14) Abetted anyone in the foregoing activities.

B. In cases of failure to pay the required fees, denial shall be automatic. Any denial, suspension, or revocation shall be subject to review pursuant to the provisions of this Chapter.

Added by Acts 1987, No. 225, § 1. Amended by Acts 1995, No. 431, § 1; 1999, No. 1369, §1.

§ 1555. Certificates; validity, renewal

Each holder of a certificate of approval shall, on or before September 30 of each and every year, pay to the treasury of the board an annual renewal fee as established by the board. Holders of a certificate who fail to renew on or before that date may be assessed a late fee as established by the board.

Added by Acts 1987, No. 225, § 1. Amended by Acts 1995, No. 431, § 1.

§ 1556. Duties

A. The duties of a CAET shall include, but are not limited to:

(1) Preparing animals for euthanasia.

(2) Carefully and accurately recording dosages and drug waste.

(3) Maintaining the security of all controlled substances and drugs, including records relating to controlled dangerous substances and drugs in accordance with applicable state and federal laws.

(4) Reporting to either the board or the Department of Health and Hospitals any infraction of this Chapter or rules and regulations adopted pursuant thereto or any misuse of drugs.

(5) Humanely restraining, capturing, and euthanizing animals.

(6) Disposing of the bodies in a manner in accordance with law.

(7) Maintaining one's certificate in an active status.

(8) Reporting to the board any change of address.

(9) Providing to any board member or board representative a reply to a request within seven working days.

B. The duties of a lead CAET shall include but are not limited to:

(1) All duties prescribed for a CAET.

(2) Ordering supplies and drugs.

(3) Responsibility at the designated site for the proper maintenance and security of all those controlled substances prescribed in accordance with rules adopted by the Board for the sole purpose of restraining, capturing, and euthanizing animals including records relating to controlled substances and drugs in accordance with applicable state and federal laws.

(4) Providing chemical capture drugs, as provided in rules adopted by the Board, only to persons who have completed a board-approved training course in the use of chemical capture drugs.

Added by Acts 1987, No. 225, § 1. Amended by Acts 1995, No. 431, § 1; 1999, No. 1369, §1.

§1557. Penalties

A. When the board finds any certified animal euthanasia technician in violation of any of the grounds set forth in this Chapter, it may enter an order imposing one or more of the following penalties:

(1) Denial of an application.

(2) Revocation or suspension of certification.

(3) Imposition of an administrative fine not to exceed one thousand dollars for each count or separate offense.

(4) Issuance of a reprimand.

(5) Placement of the certified euthanasia technician on probation for a period of time and subject to such conditions as the board may specify.

(6) Restricting the authorized scope of practice.

B. The board by rule shall provide for appeals of denials of applications. The board shall impose other administrative penalties only on the basis of a ruling by the board pursuant to an adjudicatory hearing.

C. In addition to any other disciplinary action or fines assessed by the Board, the Board may require the certified animal euthanasia technician to pay all costs of the board proceedings, including investigators', stenographers', secretaries, attorney's fees, court costs.

Added by Acts 1987, No. 225, § 1. Amended by Acts 1999, No. 1369, §1.

§ 1558. Powers of the Board

The board shall have the power to:

(1) Adopt, amend, repeal, and establish all rules necessary for its government and all regulations necessary to carry into effect the provisions of this Chapter.

(2) Establish and publish annually a schedule of fees which shall be charged for the board-approved course, examinations, certificate of approval applications, original certificates of approval, renewal of certificates of approval, and delinquent certificate of approval renewals, which fees shall be based on the anticipated financial requirements of the Board for annual operating expenses and which shall not exceed the following amounts:

(a) Course fee not to exceed two hundred dollars.

(b) Application fee not to exceed one hundred dollars.

(c) Examination fee not to exceed one hundred dollars.

(d) Original certificate of approval fee not to exceed one hundred fifty dollars.

(e) Annual renewal of certificates of approval not to exceed one hundred dollars.

(f) Late fee for delinquent certificate of approval renewals not to exceed one hundred dollars.

(g) Temporary certificate of approval fee not to exceed one hundred dollars.

(3) Adopt rules requiring a certified animal euthanasia technician to participate in a continuing education program, established and regulated by the Board, as a condition of retaining his certificate.

Added by Acts 1987, No. 225, § 1. Amended by Acts 1999, No. 1369, §1.

Chapter 12. Certified Animal Euthanasia Technicians

§1200. Definitions

A. All definitions used in this chapter shall have the meaning assigned to them in R.S. 37:1552. In addition, the following definitions shall be applied.

Certified Animal Euthanasia Technician—a person who is instructed in a board approved program in the proper methods of humanely euthanizing animals by injecting legal drugs in accordance with rules adopted by the board, in proper security precautions, in proper record keeping, and related skills, and who has been issued a certificate by the board. Only a certified animal euthanasia technician, registered veterinary technician (RVT), or veterinarian licensed by the board may legally perform pre-euthanasia chemical restraint and/or chemical euthanasia. Pre-euthanasia chemical restraint and/or chemical euthanasia cannot be delegated to another person who is not a certified animal euthanasia technician, registered veterinary technician (RVT), or veterinarian licensed by the board.

Contact Participation—physical attendance at seminars, lectures, conferences, or workshops.

Full Certification—a certificate of approval granted to an applicant who has fulfilled all requirements of this Chapter. Such certificates shall expire annually. The certificate shall entitle the CAET to perform pre-euthanasia chemical restraint and/or chemical euthanasia only at the facility site of the certificate holder's employment, which may include an animal control shelter's mobile vehicle, and only one certificate shall be issued to a certificate holder at any one time.

Lead Certified Animal Euthanasia Technician or Lead CAET—a CAET who also meets the requirements of R.S 37:1552(4). There shall be only one Lead CAET per animal control shelter or facility.

Online Participation—mediums regarded as online participation include:

a. pre-recorded, self-test audio or video presentations with third-party grading;

b. non-interactive audio or video presentations in real-time available via the internet; and

c. interactive or "live" audio or video presentations or webinars in real-time available via the internet.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1424 (November 1993), amended LR 26:317 (February 2000), LR 38:357 (February 2012), LR 40:309 (February 2014), amended by the Department of Agriculture and Forestry, Board of Veterinary Medicine, LR 50:1138 (August 2024).

§1201. Applications for Certificate of Approval

A. Pursuant to R.S. 37:1553, applicants shall submit the following items to the board:

1. a completed application form approved by the board, which shall be sworn to and subscribed before a Louisiana notary public;

2. a current passport-type photograph of the applicant;

3. an official copy of a birth certificate or a notarized copy of a current driver's license as proof of attaining the age of 18 years in order to commence the application process, attend the required training course, sit for the certification examination and receive certification as a CAET or Lead CAET;

4. an official transcript of the applicant's high school records or photocopy of the applicant's high school diploma or GED or an official transcript indicating attendance at an institution of higher learning;

5. certified scores on any previous examinations in animal euthanasia and/or proof of successful completion of a board-approved course in animal euthanasia within a three-year period;

6. certification by the applicant that he has never been convicted, pled guilty or pled nolo contendere to either a felony or misdemeanor, other than a minor traffic violation. In the event that the applicant is unable to so certify, the board shall require the applicant to explain in full and/or provide further documentation;

7. certification that the applicant has never had certification as a certified animal euthanasia technician revoked, suspended, or denied. In the event that the applicant is unable to so certify, the board shall require the applicant to explain in full and/or provide further documentation;

8. a list of all professional certificates or licenses that the applicant currently holds and/or has held;

9. a release waiver form to authorize a background check regarding the applicant's history with dangerous and/or controlled substances to be performed by the Drug Enforcement Administration or other law enforcement agency at the board's request. A photostatic copy of the applicant's authorization is accepted with the same authorization as the original. The background check must be successfully passed, which means that the Drug Enforcement Administration or other law enforcement agency has indicated to the board that the applicant has no previous criminal convictions involving dangerous and/or controlled substances;

10. certification by the applicant that he has not violated or been subject to any of the grounds for denial of a certificate of approval as listed in R.S. 37:1554;

11. unless otherwise already in possession of the board, evidence that the applicant has successfully completed a board-approved program in animal euthanasia, which shall include instruction in the proper methods of humanely euthanizing animals by injecting legal drugs in accordance with rules adopted by the board, in proper security precautions, in proper record keeping, and related skills identified by the board.

B. The board may reject any applications which do not contain full and complete answers and/or information as requested and may reject any application if any information furnished in the application is fabricated, false, misleading, or incorrect.

C. The board shall reject the application of an applicant who has practiced veterinary medicine, veterinary technology, or euthanasia technology with sodium pentobarbital in this state without a certificate of approval during the two year period immediately prior to application.

D. An application shall become stale if not completed by issuance of a certificate within two years from the initial date of submission to the board. Once stale, the entire application process, including the payment of applicable fees, shall begin anew.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1424 (November 1993), amended LR 26:317 (February 2000), LR 29:1479 (August 2003), LR 38:357 (February 2012), LR 40:310 (February 2014), effective July 1, 2024.

§1203. Examinations

A. The board may formulate, administer and grade an examination (herein defined as such written examination, oral interviews, and/or practical demonstrations as the board may request or require) or may select an agency whose qualifications for performing any or all of theses functions are recognized by the board and charge said agency with the formulation, administration and/or grading of the examination.

B. All applicants for full certification must take and pass the examination(s) adopted by the board.

C. The administration of the examination(s) shall be in accordance with rules, practices, policies, or procedures prescribed by the board or by the designees of the board or by any person or person with whom the board may have contracted to administer said exam. The exam may be administered by members of the board or any of the agents, employees, or designees of the board.

D. The examination may be prepared, administered and graded by the members of the board or may be prepared, administered and/or graded, in whole or in part, by any person, firm, corporation or other entity selected, requested or designated to do so by the board.

E. The course shall consist of presentations in the areas of legal concerns (Veterinary Practice Act), record-keeping requirements (Veterinary Practice Act and DEA), human safety, and a general knowledge of sodium pentobarbital and proper euthanasia techniques.

F. The administration of the course shall be in accordance with rules, practices, policies, or procedures prescribed by the board or its designees. Instruction may be provided by the members of the board or any agent, employee, or designee of the board.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1424 (November 1993).

§1205. Passing Scores

A. A passing score on any written and/or oral portions of the examination shall be deemed to be the correct answering of 70 percent of the questions contained on that portion of the examination.

B. A passing grade on the practical portion of the examination will be determined by the successful completion of a series of hands-on demonstrations which indicate that the applicant has been properly trained in procedures which will enable him to safely and effectively perform humane euthanasia with sodium pentobarbital.

C. Applicants who fail to achieve a passing score on any portion of the examination, either written or practical, will not be eligible for a certificate of approval nor may they apply for a temporary certificate of approval.

D. Appeals concerning the examination must be made in writing to the board within 30 days of the administration of the examination. All such formal appeals will be reviewed at the next available meeting of the board. The board may call witnesses and/or hold public hearings as it deems necessary although it is not required to do so unless otherwise specified by statute. The decision of the board regarding such appeals is final.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1425 (November 1993), amended LR 26:318 (February 2000).

§1207. Certificates without Examination

A. The board shall not issue full certificates of approval without examination under any circumstances, except as provided in this Chapter.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1425 (November 1993), amended LR 26:318 (February 2000).

§1209. Pre-Euthanasia Restraint

A. Euthanasia by intracardiac injection on cats and dogs shall be prohibited unless the animal is unconscious or rendered completely unconscious and insensitive to pain through the injection of an anesthetic. Such prohibition is applicable to animal control shelters and their animals located on site as well as their animals which may be transported to a veterinary clinic for euthanasia. Temporary transfer of ownership of the animal to the veterinarian by the animal control shelter for euthanasia by cardiac injection is a violation of the law. The performance of euthanasia by intracardiac injection in violation of this section by a CAET and/or veterinarian is sanctionable.

B. A CAET (lead status or otherwise) shall not use any drug for purposes of sedation, or any form of anesthesia, since sedation is beyond the permissible scope of euthanasia practice for this certificate holder. However, Acepromazine, Rompun (xylazine), or Domitor (medetomidine) which are non-controlled drugs, may be legally used by CAETs for pre-euthanasia restraint of feral/fractious animals. If an animal control shelter's animal must be sedated/anesthetized pursuant to Subsection A above, then a LA licensed veterinarian must perform this service.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 38:357 (February 2012).

§1211. Fees

A. The board hereby adopts and establishes the following fees for the CAET program.

Application Fee	$25
Course Fee	$80
Annual Renewal of Certificate	$50
Examination Fee	$50
Late Renewal Fee	$25
Original Fee-Full Certification	$50

B. Renewals received after the expiration date as provided in R.S. 37:1546, shall be charged a late renewal fee.

C. The board may direct that examination fees be assigned or remitted directly to the agency selected to prepare, administer, and score the examination in animal euthanasia. Said agency may not assess fees in addition to those set by the board.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1425 (November 1993), amended LR 26:318 (February 2000), LR 38:358 (February 2012).

§1213. Renewal of Certificates

A. All certificates of approval shall expire annually at midnight September 30. Certificates shall be renewed by completing a re-registration form which shall be provided by the board and by payment of the annual renewal fee established by the board.

B. Each year, 90 days prior to the expiration date of the license, the board shall mail a notice to each certified animal euthanasia technician stating the date his certificate will expire and providing a form for re-registration.

C. The certificate of approval will be renewed for any person who complies with the requirements of this Chapter.

D. Re-registration forms for renewal of certificates of approval, complete with payment of fee and any other documents required by this Chapter, shall be postmarked no later than the expiration date of the license each year. Re-registration forms postmarked after midnight of the expiration date will be subject to a late renewal fee as established by the board. This fee is in addition to the regular fee for annual renewal.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1426 (November 1993), amended LR 23:1685 (December 1997), LR 26:319 (February 2000).

§1215. Expired Certificate

A. A certified animal euthanasia technician whose certificate has expired may be reinstated within one year of its expiration by making written application for renewal, paying the current renewal fee plus all delinquent renewal fees and late fees, and meeting the continuing education requirements prescribed by the board.

B. A CAET who fails to renew a certificate of approval within one year of its expiration must reapply for a new certificate. A certificate of approval shall not be issued without the approval of a majority of the quorum of the board.

C. The identifying number of an expired certificate of approval shall not be issued to any person other than the original holder of that number.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1426 (November 1993), amended LR 26:319 (February 2000).

§1217. Revoked Certificate

A. A person whose certificate of approval has been revoked pursuant to R.S. 37:1554 must reapply for a new certificate.

B. A person whose certificate of approval has been revoked pursuant to R.S. 37:1554 shall not be issued a new certificate unless approved by a majority of the quorum of the board.

C. The identifying number of a revoked certificate of approval shall not be issued to any person other than the original holder of that number.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 26:319 (February 2000).

§1219. Appeals and Review

A. Any applicant for a certificate of approval desiring to review his examination and/or the master answer sheet and/or the examination questions shall make arrangements with the board, its agent, designee or any other person, firm, corporation, or entity charged with the preparation, grading and/or administration of the course for such review.

B. Persons Aggrieved by a Decision of the Board

1. Any certified animal euthanasia technician aggrieved by a decision of the board, other than a holder of a certificate of approval against whom disciplinary proceedings have been brought pursuant to R.S. 37:1551 et seq., may, within 30 days of notification of the board's action or decision, petition the board for a review of the board's actions.

2. A petition shall be in the form of a letter, signed by the person aggrieved, and mailed to the board at its principal office.

3. Upon receipt of such petition, the board may proceed to take such action as it deems expedient or hold such hearings as may be necessary, and may review such testimony and/or documents and/or records as it deems necessary to dispose of the matter, but the board shall not, in any event, be required to conduct any hearings or investigations, or consider any offerings, testimony, or evidence unless so required by statute or other rules or regulations of the board.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1426 (November 1993), amended LR 25:2227 (November 1999), LR 26:319 (February 2000).

§1221. Disciplinary Proceedings

A. Any CAET against whom disciplinary proceedings have been instituted and against whom disciplinary action has been taken by the board pursuant to R.S. 37:1551 et seq., and/or the board's rules, shall have rights of review and/or rehearing and/or appeal in accordance with the terms and provisions of the Administrative Procedure Act and §1401 et seq., of the board's rules.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2227 (November 1999), amended LR 26:319 (February 2000).

§1223. Maintenance and Security of Sodium Pentobarbital

A. Storage. All sodium pentobarbital shall be stored either in a securely locked cabinet which is of substantial construction or in a safe or in a locked metal cabinet. The cabinet, safe or locker shall be locked at all times. The CAET(s) shall have the responsibility for the safe-keeping of the keys and/or combination to the cabinet, safe, or locker.

B. Usage Log

1. A usage log shall be maintained to account for the use of each cubic centimeter (cc) or parts thereof of sodium pentobarbital. The log shall include:

a. the date of usage;

b. the lot number and bottle number used;

c. the amount (in cc's) of usage;

d. the tag number or other identification number for the animal;

e. the name of the person who drew the sodium pentobarbital;

f. any amount of drug wasted, spilled, or lost; and

g. the name of a witness to the waste, spillage, or loss of sodium pentobarbital.

2. The usage log shall be maintained on a standardized form provided by the board or its designated agent. Copies of the log so provided may be made by the shelter.

3. Usage logs shall be made available to any official of the Drug Enforcement Administration without prior notification.

C. Inventory

1. A perpetual inventory of all sodium pentobarbital shall be maintained. An initial inventory must be conducted when a CAET first obtains a DEA registration and/or Louisiana Controlled Dangerous Substances License. A physical inventory shall be conducted every three months.

2. The inventory shall indicate the amount of sodium pentobarbital ordered, the amount presently on hand, the amount used for euthanasia, the amount lost due to spillage or waste, the amount lost due to the drug's expiration, and the time of day the inventory was taken.

3. The inventory shall be made and signed by the certified animal euthanasia technician(s) or licensed veterinarian who is the registrant of the Drug Enforcement Administration.

4. Upon written request from either the Louisiana Board of Veterinary Medicine or the Department of Health and Hospitals, the certified animal euthanasia technician shall provide a copy of the inventory records.

5. Inventory logs shall be made available to any official of the Drug Enforcement Administration without prior notification.

6. The inventory log shall be maintained on a standardized form provided by the board or its designee. Copies of the form so provided may be made by the shelter.

D. Orders, Destruction, and Thefts

1. Placing Orders. All sodium pentobarbital must be purchased by way of a DEA 222 Order Form. Alterations and scratch-outs are not allowed on this form. If a mistake is made on the form, "void" must be written on the form and the form must be maintained in the file.

2. Receiving Orders. The date and amounts received must be logged in on the order form.

3. Returns of Sodium Pentobarbital to Suppliers. If sodium pentobarbital must be returned to a supplier or transferred to another person possessing a DEA registration and Louisiana Controlled Dangerous Substances License, the supplier or person to whom the drugs are transferred must complete a DEA 222 Order Form. Both the person returning or transferring the sodium pentobarbital and the recipient must maintain a copy of the DEA 222 Form.

4. Destruction of Sodium Pentobarbital. Sodium pentobarbital shall not be destroyed without the prior approval of the U.S. Drug Enforcement Administration. Any destruction approved must be witnessed by a law enforcement officer.

5. Any theft of sodium pentobarbital must be reported to the local police, U.S. Drug Enforcement Administration, and the Louisiana Controlled Dangerous Substances Program.

E. Record Retention. All controlled substances records, including, but not limited to, inventory documents, usage logs, order forms, reports of theft or destruction of controlled substances, must be maintained for a minimum of five years plus the current calendar year.

F. Leaving Employment. A CAET registered with the U.S. Drug Enforcement Administration who leaves employment at a registration site must return his DEA registration any unused DEA Order Form 222s to the DEA. A CAET licensed with the Louisiana Controlled Dangerous Substances Program who leaves employment at a licensed site must return his license to the Louisiana Controlled Dangerous Substances Program.

G. Changing Site Address. It is the responsibility of the CAET registered with the U.S. Drug Enforcement Administration or licensed by the Louisiana Controlled Dangerous Substances Program to inform in writing either or both of those agencies if the address of the site at which he is registered or licensed changes. The written notification must include the name of the CAET, his registration or license number, the current address of the site, the pending new address of the site, the site name, and the signature of the CAET. Written notification must be submitted to the Drug Enforcement Administration and/or Louisiana Controlled Dangerous Substances Program prior to the relocation of the site.

H. Failure of a CAET to comply with any and all provisions of this Section shall be considered a violation of the rules of professional conduct within the meaning of R.S. 37:1554.A.(12).

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 19:1426 (November 1993), amended LR 26:319 (February 2000).

§1225. Responsibilities of a Lead CAET

A. Designation

1. Pursuant to R.S. 37:1552(4), a person seeking designation as a Lead CAET must submit the following to the board:

a. a completed application form approved by the board which shall be sworn to and notarized before a Louisiana notary public;

b. a copy of his current Louisiana state controlled dangerous substances license;

c. a copy of his current registration with the U.S. Drug Enforcement Administration;

d. documentation from the sponsor of a board-approved chemical capture training course that:

i. he has completed the chemical capture training course; or

ii. until December 31, 2000, if a designee applicant completed a chemical capture training course prior to August 1, 2000, he may submit documentation of such completion along with information concerning the content of the course to the board; the board may approve the course and accept it as sufficient to meet the requirements of R.S. 37:1552(4)(c).

B. Legal Drugs. Pursuant to R.S. 37:1556.B, those controlled substances a Lead CAET may legally order and maintain for the sole purpose of restraining, capturing and euthanizing animals shall be limited to the following:

1. sodium pentobarbital at a minimum strength of six grains per milliliter;

2. tiletamine hydrochloride and zolazepam hydrochloride; and

3. ketamine hydrochloride.

C. Providing Chemical Capture Drugs

1. A Lead CAET shall provide chemical capture drugs only to persons who have completed a board-approved training course in the use of chemical capture drugs.

2. Prior to transferring chemical capture drugs to a person who has completed a board-approved training course in the use of chemical capture drugs, a Lead CAET shall have and maintain on file documentation from the sponsor of the board-approved course that the person completed the course. Until December 31, 2000, if a person to whom the Lead CAET provides chemical capture drugs completed a chemical capture training course prior to August 1, 2000, the Lead CAET may submit documentation of such completion along with information concerning the content of the course to the board. The board may approve the course and accept it as sufficient to meet the requirements of R.S. 37:1556.B.(4).

3. Prior to ordering, maintaining, or providing any controlled substance under his own authority to another person, the lead CAET must be registered with the Drug Enforcement Administration (DEA) and licensed by the state controlled dangerous substances program at the shelter location where the drugs will be stored and administered.

4. The Lead CAET must maintain and store the controlled substances allowed for use under §1225.B in a manner which meets or exceeds the requirements of all federal or state drug enforcement agencies, including storage of controlled substances in a securely locked, substantially constructed cabinet and the keeping of a perpetual inventory as required by LAC 48:I.Chapter 39.

5. Use of controlled substances allowed under §1225.B shall be documented to include, but not limited to:

a. date of each use of the drug;

b. species of animal;

c. estimated weight of animal;

d. dose administered;

e. name of animal control officer to whom the drug was transferred and who administered the drug;

f. a perpetual (running) inventory of the drug present at the facility; and

g. both the Lead CAET and person to whom the drug is transferred shall sign a drug sign-out document each time the drug is transferred for use.

6. The Lead CAET shall review each use of the controlled substances allowed under §1225.B and the Lead CAET shall initial the usage log entries to indicate this review. A review of the usage logs shall be made at least quarterly and the quantities of drug used and on hand shall be tallied and authenticated. Any variance shall be noted in the log and steps should be taken and documented to correct the problem.

7. Any removal of the controlled substances allowed under §1225.B from the securely locked, substantially constructed cabinet shall be in minimal amounts, shall be maintained in a locked container when not in use, and shall be documented in a manner to include, but not be limited to:

a. a signed log indicating the person removing the drug;

b. the date on which the drug was removed;

c. an accounting for all drug used and the amount returned;

d. the date on which the remaining drug was returned and the signature of the person returning it.

8. This Section does not pertain to any drug(s) listed in any DEA classification schedule (also known as controlled drugs) or state of Louisiana classification schedule, except those allowed under §1225.B.

D. Failure of a Lead CAET to comply with any and all provisions of §1223 and §1225 shall be considered a violation of the rules of professional conduct within the meaning of R.S. 37:1554.A.(12).

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 26:320 (February 2000).

§1227. Continuing Education

A. Basic Requirements

1. A minimum of 6 actual hours is required each fiscal year (July 1 through June 30) as a prerequisite for annual renewal of certification; however, a maximum of 3 hours shall be earned for each fiscal period (July 1 to June 30) through online participation as defined in LAC 46:LXXXV.1200. An CAET who fails to obtain a minimum of 6 continuing education hours within the applicable fiscal period will not meet the requirements for renewal of his certificate.

2.a. Proof of attendance for all completed continuing education activity shall be submitted annually for each renewal period and shall include the following:

i. the CAET's full name;

ii. the name of the course/program;

iii. the name of the sponsor and/or presenter;

iv. the date(s) of attendance;

v. the total number of hours completed;

vi. the delivery method; and

vii. the specific subject matter completed.

b. All completed proof of attendance must be submitted to the board by September 30.

3. All hours shall be obtained in the 12 months preceding the renewal period of the certificate. Hours taken prior to the 12-month continuing education period shall not be accepted. Hours taken after the beginning of the renewal period shall be considered late. Hours submitted late, if accepted by the board, cannot be applied to other renewal periods.

4. Each CAET must fulfill his annual educational requirements at his own expense or through a sponsoring agency other than the board. Any registration fee(s) for his annual continuing veterinary education requirements are not included in the annual renewal fee.

5. Presenters of an approved continuing education program may not submit hours for their presentation of, or preparation for, the program as continuing education hours.

B. Approved Continuing Education Programs. It shall be the duty of the board to approve all continuing veterinary education programs for which credit shall be given to Louisiana certified animal euthanasia technicians as follows.

1. Hours may be taken from any programs accepted by another state's regulatory board of veterinary medicine, a governmental entity, and/or AAVSB, as well as those programs sponsored by AVMA accredited schools of veterinary medicine and/or any professional associations recognized by the board shall be accepted as units or hours of annual continuing education with the subject matter content properly addressing the duties of a certified animal euthanasia technician. All other continuing education programs must be approved by the board prior to attendance with the subject matter content properly addressing the duties of a certified animal euthanasia technician. Those continuing education programs not timely submitted in accordance with Subsection C below will not be allowed for annual continuing education credit.

2. The list of programs for which pre-approval has been granted will be updated as needed and published by the board on its website, as well as those programs which are accepted by another state's regulatory board of veterinary medicine, a governmental entity, and/or AAVSB, and those programs sponsored by AVMA accredited schools of veterinary medicine and/or any professional associations recognized by the board.

3. Additions to the list of pre-approved programs may be requested by writing to the board office and submitting all required documentation. All programs not on the pre-approved list must be submitted for pre-approval at least 14 days prior to the date of the program for the units or hours to be credited. Pre-approval may be obtained by writing or calling the board office during regular business hours.

4. In order to qualify for board approval, all continuing education programs must be open by invitation/advertisement to interested certified animal euthanasia technicians in general.

C. Non-Compliance with Continuing Education Requirements

1. Non-compliance with these rules shall be considered to be a violation of R.S. 37:1526(14).

2. Failure to submit proof of attendance for continuing education hours by the September 30 deadline pursuant to Subsection A or falsifying certification shall be considered a violation of R.S. 37:1526(14) and/or (15).

3. Failure to obtain the required number of hours in the specified time period shall be considered a violation of the rules of professional conduct. An extension of no more than 90 days after the September 30 certificate expiration date may be granted by petitioning the board in accordance with Paragraph 4 below.

4. The board may grant an extension of no more than 90 days for extenuating circumstances. The CAET requesting the extension must petition the board at least 30 days prior to the September 30 certificate expiration date. The board may require whatever documentation it deems necessary to verify the circumstances necessitating the extension.

5. A CAET who fails to obtain the required minimum of 6 approved hours within the prescribed 12-month period will not meet the requirements for renewal of his certificate. Such a certificate shall expire on September 30 for any CAET who does not timely and properly comply with the annual continuing education requirements. Thereafter, a CAET may apply for renewal of his expired certificate; however, he shall be unable to lawfully perform the allowed duties of a CAET and may be subject to disciplinary action by the board, until such time as the requirements for renewal have been met and documented to the satisfaction of the board.

D. The promulgation of rule amendments by the board published in the *Louisiana Register* on January 20, 2011 shall become effective for the period of time (July 1, 2010-June 30, 2011) for the 2011-2012 annual certificate renewal and every annual certificate renewal period thereafter.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1558.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 26:321 (February 2000), amended LR 36:320 (February 2010), LR 37:1153 (April 2011), amended by the Department of Health, Board of Veterinary Medicine, LR 44:588 (March 2018), amended by the Department of Agriculture and Forestry, Board of Veterinary Medicine, LR 50:1138 (August 2024).

Chapter 14. Disciplinary Procedures

§1401. Causes for Administrative Action

A. The board, after due notice and hearing as set forth herein and the Administrative Procedure Act, R.S. 49:950 et seq., may deny, revoke or suspend any license, temporary permit, or certification issued or applied for or otherwise discipline a licensed veterinarian, registered veterinary technician or certified animal euthanasia technician on a finding that the person has violated the Louisiana Veterinary Practice Act, any of the rules and regulations promulgated by the board, the Principles of Veterinary Medical Ethics of the American Veterinary Medical Association, or prior final decisions and/or consent orders involving the licensed veterinarian, registered veterinary technician or certified animal euthanasia technician or applicant. Sometimes hereinafter in this Chapter, where the context allows, a licensed veterinarian, registered veterinary technician or certified animal euthanasia technician or applicant may be referred to as "person."

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2227 (November 1999).

§1403. Disciplinary Process and Procedures

A. The purpose of the following rules and regulations is to supplement and effectuate the applicable provisions of the Administrative Procedure Act, R.S. 49:950 et seq., regarding the disciplinary process and procedures incident thereto. These rules and regulations are not intended to amend or repeal the provisions of the Administrative Procedure Act, and to the extent any of these rules and regulations are in conflict therewith, the provisions of the Administrative Procedure Act shall govern.

B. A disciplinary proceeding, including the formal hearing, is less formal than a judicial proceeding. It is not subject to strict rules and technicalities, but must be conducted in accordance with considerations of fair play and constitutional requirements of due process.

C. The purpose of a disciplinary proceeding is to determine contested issues of law and fact; whether the person did certain acts or omissions and, if he did, whether those acts or omissions violated the Louisiana Veterinary Practice Act, the rules and regulations of the board, the Principles of Veterinary Medical Ethics of the American Veterinary Medical Association, or prior Final Decisions and/or Consent Orders involving the veterinarian, registered veterinary technician or certified animal euthanasia technician or applicant and to determine the appropriate disciplinary action.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2227 (November 1999).

§1405. Initiation of Complaints

A. Complaints may be initiated by any person or by the board on its own initiative.

B. All complaints shall be addressed confidential and shall be sent to the board office. The investigating board member, with benefit of counsel, shall decide to investigate the charges or deny the charges. If the charges are denied, a letter of denial is prepared and forwarded to the complainant and the person accused of wrongdoing. If the investigating board member decides to investigate, the person shall be notified that allegations have been made that he may have committed a breach of statute, rule and regulation, the American Veterinary Medical Association's Principles of Veterinary Medical Ethics, and/or prior final decisions or consent orders and that he must respond in writing to the board within a specified time period. The response is to be made to the board office address. The complaint letter of alleged violations shall not be given initially to the person. However, sufficiently specific allegations shall be conveyed to the person for his response. Once the person has answered the complaint, and other pertinent information, if available, is reviewed, a determination by the investigating board member, with benefit of counsel, will be made if a disciplinary proceeding is required.

C. Pursuant to its authority to regulate the industry, the board through its investigating board member, may issue subpoenas to secure evidence of alleged violations of the Louisiana Veterinary Practice Act, any of the rules and regulations promulgated by the board, the American Veterinary Medical Association's Principles of Veterinarian Medical Ethics, or prior final decisions and/or consent orders involving the licensed veterinarian, registered veterinary technician or certified animal euthanasia technician or applicant.

D. *Counsel* referenced in this Chapter shall mean the board's General Counsel who will be assisting in the investigation and prosecution of an administrative action. Said counsel shall not provide any legal advices or act as legal counsel to the board or its members, other than the investigating board member, regarding a pending administrative action during the investigation, prosecution and resolution of such disciplinary action by the board.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2227 (November 1999).

§1407. Informal Disposition of Complaints

A. Some complaints may be settled informally by the board and the person accused of a violation without a formal hearing. The following types of informal dispositions may be utilized.

1. Disposition by Correspondence. For complaints less serious, the investigating board member may write to the person explaining the nature of the complaint received. The person's subsequent response may satisfactorily explain the situation, and the matter may be closed. If the situation is not satisfactorily explained, it shall be pursued through an informal conference or formal hearing.

2. Informal Conference

a. The investigating board member may hold a conference with the person in lieu of, or in addition to, correspondence in cases of less serious complaints. If the situation is satisfactorily explained in conference, a formal hearing is not scheduled.

b. The person shall be given adequate notice of the conference, of the issues to be discussed, and of the fact that information brought out at the conference may later be used in a formal hearing. Board members, other than the investigating board member, may not be involved in informal conferences.

3. Settlement. An agreement worked out between the person making the complaint and the person accused of a violation does not preclude disciplinary action by the board. The nature of the offense alleged and the evidence before the board must be considered.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2228 (November 1999).

§1409. Formal Hearing

A. The board has the authority, granted by R.S. 37:1511 et seq., to bring administrative proceedings against persons to whom it has issued a license, temporary permit or certification or any applicant requesting a license, temporary permit or certification. The person has the right to appear and be heard, either in person or by counsel; the right of notice; a statement of what accusations have been made; the right to present evidence and to cross-examine; and the right to have witnesses subpoenaed.

B. If the person does not appear, either in person or through counsel, after proper notice has been given, the person may be considered to have waived these rights and the board may proceed with the hearing without the presence of the person.

C. The process of administrative action shall include certain steps and may include other steps as follows.

1. The board receives a complaint alleging that a person has acted in violation of the Louisiana Veterinary Practice Act, the rules and regulations of the board, or the Principles of Veterinary Medical Ethics of the American Veterinary Medical Association. Communications from the complaining party shall not be revealed to any person until and unless a formal complaint is filed except those documents being subpoenaed by a court.

2.a. The complaint is investigated by the investigating board member or board attorney to determine if there is sufficient evidence to warrant disciplinary proceedings. No board member, other than the investigating board member, may communicate with any party to a proceeding or his representative concerning any issue of fact or law involved in that proceeding.

b. A decision to initiate a formal complaint or charge is made if one or more of the following conditions exist:

i. the complaint is sufficiently serious;

ii. the person fails to respond to the board's correspondence concerning the complaint;

iii. the person's response to the board's letter or investigation demand is not convincing that no action is necessary; or

iv. an informal approach is used, but fails to resolve all of the issues.

3. A sworn complaint is filed, charging the violation of one or more of the provisions of the Louisiana Veterinary Practice Act, the rules and regulations promulgated thereto, the American Veterinary Medical Association's Principles of Veterinary Medical Ethics, or prior final decisions and/or consent orders involving the person.

4. A time and place for a hearing is fixed by the chairman or an agent of the board.

5.a. At least 20 days prior to the date set for the hearing, a copy of the charges and a notice of the time and place of the hearing are sent by certified mail to the last known address of the person accused. If the mailing is not returned to the board, it is assumed to have been received. It is the person's obligation to keep the board informed of his whereabouts.

b. The content of the charges limits the scope of the hearing and the evidence which may be introduced. The charges may be amended at any time up to 10 days prior to the date set for the hearing.

c. If the board is unable to describe the matters involved in detail at the time the sworn complaint is filed, this complaint may be limited to a general statement of the issues involved. Thereafter, upon the person's request, the board shall supply a more definite and detailed statement to the person.

6. Except for extreme emergencies, motions requesting a continuance of a hearing shall be filed at least

five days prior to the time set for the hearing. The motion shall contain the reason for the request, which reason must have relevance to due process.

7.a. The chairman, or an authorized agent of the board, issues subpoenas for the board for disciplinary proceedings, and when requested to do so, may issue subpoenas for the other party. Subpoenas include:

i. a subpoena requiring a person to appear and give testimony; and

ii. a subpoena duces tecum, which requires that a person produce books, records, correspondence, or other materials over which he has custody.

b. A motion to limit or quash a subpoena may be filed with the board, but not less than 72 hours prior to the hearing.

8. a. The hearing is held, at which time the board's primary role is to hear evidence and argument, and to reach a decision. Any board member who, because of bias or interest, is unable to assure a fair hearing, shall be recused from the particular proceeding. The reasons for the recusal are made part of the record. Should the majority of the board members be recused for a particular proceeding, the governor shall be requested to appoint a sufficient number of pro tem members to obtain a quorum for the proceeding.

b. The board is represented by its agent who conducted the investigation and presents evidence that disciplinary action should be taken against the person and/or by the board's attorney. The person may present evidence personally or through an attorney, and witnesses may testify on behalf of the person.

c. Evidence includes the following:

i. oral testimony given by witnesses at the hearing, except that, for good cause, testimony may be taken by deposition (cost of the deposition is borne by requesting party);

ii. documentary evidence, i.e., written or printed materials including public, business, institutional records, books and reports;

iii. visual, physical and illustrative evidence;

iv. admissions, which are written or oral statements of a party made either before or during the hearing;

v. facts officially noted into the record, usually readily determined facts making proof of such unnecessary; and/or

vi. other items or things allowed into evidence by the Louisiana Evidence Code or applicable statutory law or jurisprudence.

d. All testimony is given under oath. If the witness objects to swearing, the word "affirm" may be substituted.

9. The chairman of the board presides and the customary order of proceedings at a hearing is as follows:

a. the board's representative makes an opening statement of what he intends to prove, and what action, he wants the board to take;

b. the person, or his attorney, makes an opening statement, explaining why he believes that the charges against him are not legally founded;

c. the board's representative presents the case against the person;

d. the person, or his attorney, cross-examines;

e. the person presents evidence;

f. the board's representative cross-examines;

g. the board's representative rebuts the person's evidence;

h. both parties make closing statements. The board's representative makes the initial closing statement and the final statement.

10. Motions may be made before, during, or after a hearing. All motions shall be made at an appropriate time according to the nature of the request. Motions made before or after the hearing shall be in writing. Those made during the course of the hearing may be made orally since they become part of the record of the proceeding.

11.a. The record of the hearing shall include:

i. all papers filed and served in the proceeding;

ii. all documents and/or other materials accepted as evidence at the hearing;

iii. statements of matters officially noticed;

iv. notices required by the statutes or rules; including notice of the hearing;

v. affidavits of service or receipts for mailing or process or other evidence of service;

vi. stipulations, settlement agreements or consent orders, if any;

vii. records of matters agreed upon at a prehearing conference;

viii. reports filed by the hearing officer, if one is used;

ix. orders of the board and its final decision;

x. actions taken subsequent to the decision, including requests for reconsideration and rehearing;

xi. a transcript of the proceedings, if one has been made, or a tape recording or stenographic record.

b. The record of the proceeding shall be retained until the time for any appeal has expired, or until the appeal has been concluded. The record is not transcribed unless a

party to the proceeding so requests, and the requesting party pays for the cost of the transcript.

12.a. The decision of the board shall be reached according to the following process:

i. determine the facts at issue on the basis of the evidence submitted at the hearing;

ii. determine whether the facts in the case support the charges brought against the person; and

iii. determine whether charges brought are in violation of the Louisiana Veterinary Practice Act, rules and regulations of the board, and/or the American Veterinary Medical Association's Principles of Veterinary Medical Ethics.

b. Deliberation

i. The board will deliberate in closed session.

ii. The board will vote on each charge as to whether the charge has been supported by the evidence. The standard will be "preponderance of the evidence."

iii. After considering each charge, the board will vote on a resolution to dismiss the charges, deny, revoke or suspend any license, temporary permit or certification issued or applied for or otherwise discipline a person or applicant. An affirmative vote of a majority of the quorum of the board shall be needed to deny, revoke, or suspend any license, temporary permit or certification issued or applied for in accordance with the provisions of this Chapter or otherwise discipline a person or applicant. The investigating board member shall not be involved in or present during deliberation, nor shall he be included in the quorum or allowed to vote on the outcome of the proceeding.

c. Sanctions against the person who is party to the proceeding are based upon findings of fact and conclusions of law determined as a result of the hearing, and will be issued by the board in accordance with applicable statutory authority. The party is notified by mail of the final decision of the board.

d. In addition to the disciplinary action or fines assessed by the board against a licensed veterinarian or temporary permittee, the board may assess all costs incurred in connection with the proceedings, including but not limited to investigators', stenographers', attorney's fees and court costs.

e. With regard to a registered veterinary technician, the board may, as a probationary condition or as a condition of the reinstatement of any certification suspended or revoked hereunder, require the holder to pay all costs of the board proceedings, including investigators', stenographers', secretaries', attorneys' fees and court costs.

f. With regard to a certified animal euthanasia technician, the board may require the holder to pay all costs of the board proceedings, including investigators', stenographers', secretaries', attorneys' fees, and court costs.

13. Every order of the board shall take effect immediately on its being rendered unless the board in such order fixes a stay of execution of a sanction for a period of time against an applicant or licensee, temporary permittee or holder of a certificate. Such order, without a stay of execution, shall continue in effect until expiration of any specified time period or termination by a court of competent jurisdiction. The board shall notify all licensees, temporary permittees or holders of certificates of any action taken against him and may make public its orders and judgment in such manner and form as allowed by law.

14.a. The board may reconsider a matter which it has decided. This may involve rehearing the case, or it may involve reconsidering the case on the basis of the record. Such reconsideration may occur when a party who is dissatisfied with a decision of the board files a motion requesting that the decision be reconsidered by the board.

b. The board shall reconsider a matter when ordered to do so by a higher administrative authority or when the case is remanded for reconsideration or rehearing by a court to which the board's decision has been appealed.

c. A motion by a party for reconsideration or rehearing must be in proper form and filed within 10 days after notification of the board's decision. The motion shall set forth the grounds for the rehearing, which include one or more of the following:

i. the board's decision is clearly contrary to the law and evidence;

ii. there is newly discovered evidence by the party since the hearing which is important to the issues and which the party could not have discovered with due diligence before or during the hearing;

iii. there is a showing that issues not previously considered ought to be examined in order to dispose of the case properly; or

iv. it would be in the public interest to further consider the issues and the evidence.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2228 (November 1999).

§1411. Consent Order

A. An order involving a type of disciplinary action may be made to the board by the investigating board member with the consent of the person. To be accepted, a consent order requires formal consent of a majority of the quorum of the board. Such quorum does not include the investigating board member. It is not the result of the board's deliberation; it is the board's acceptance of an agreement reached between the board and the person. A

proposed consent order may be rejected by the board in which event a formal hearing will occur. The consent order, if accepted by the board, is issued by the board to carry out the parties' agreement.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2230 (November 1999).

§1413. Withdrawal of a Complaint

A. If the complainant wishes to withdraw the complaint, the inquiry is terminated, except in cases where the investigating board member judges the issues to be of such importance as to warrant completing the investigation in its own right and in the interest of public welfare.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2230 (November 1999).

§1415. Refusal to Respond or Cooperate with the Board

A. If the person does not respond to the original inquiry within a reasonable period of time as requested by the board, a follow-up letter shall be sent to the person by certified mail, return receipt requested.

B. If the person refuses to reply to the board's inquiry or otherwise cooperate with the board, the board shall continue its investigation. The board shall record the circumstances of the person's failure to cooperate and shall inform the person that the lack of cooperation may result in action which could eventually lead to the denial, revocation or suspension of his license, temporary permit or certification, or application for licensure, temporary permit or certification, or otherwise issue appropriate disciplinary sanction.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2230 (November 1999).

§1417. Judicial Review of Adjudication

A. Any person whose license, temporary permit or certification, or application for licensure, temporary permit or certification, has been denied, revoked or suspended or otherwise disciplined by the board shall have the right to have the proceedings of the board reviewed by the state district court for the parish of East Baton Rouge, provided that such petition for judicial review is made within 30 days after the notice of the decision of the board. If judicial review is granted, the board's decision is enforceable in the interim unless the court orders a stay.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2231 (November 1999).

§1419. Appeal

A. A person aggrieved by any final judgment rendered by the state district court may obtain a review of said final judgment by appeal to the appropriate circuit court of appeal. Pursuant to the applicable section of the Administrative Procedure Act, R.S. 49:950 et seq., this appeal shall be taken as in any other civil case.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2231 (November 1999).

§1421. Reinstatement of Suspended or Revoked License

A. Any person whose license is suspended or revoked may, at the discretion of the board, be relicensed or reinstated at any time without an examination by majority vote of the board on written application made to the board showing cause justifying relicensing or reinstatement.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2231 (November 1999).

§1423. Declaratory Statements

A. The board may issue a declaratory statement in response to a request for clarification of the effect of the provisions contained in the Louisiana Veterinary Practice Act, R.S. 37:1511 et seq., the rules and regulations promulgated by the board and/or the Principles of Veterinary Medical Ethics of the American Veterinary Medical Association.

B. A request for declaratory statement is made in the form of a petition to the board. The petition should include at least:

1. the name and address of the petitioner;

2. specific reference to the statute, rule and regulation, or the American Veterinary Medical Association's Principles of Veterinary Medical Ethics to which the petitioner relates; and

3. a concise statement of the manner in which the petitioner is aggrieved by the statute, rules and regulations, or provision of the American Veterinary Medical Association's Principles of Veterinary Medical Ethics by its potential application to him in which he is uncertain of its effect.

C. The petition shall be considered by the board within a reasonable period of time taking into consideration the nature of the matter and the circumstances involved.

D. The declaratory statement of the board in response to the petition shall be in writing and mailed to the petitioner at the last address furnished to the board.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2231 (November 1999).

§1425. Injunction

A. The board or any citizen of this state may bring an action to enjoin any person from practicing veterinary medicine without a currently valid license or temporary permit.

B. If the court finds that the person is violating, or is threatening to violate, this Chapter it shall enter an injunction restraining him from such unlawful acts.

C. The successful maintenance of an action based on any one of the remedies set forth in this rule shall in no way prejudice the prosecution of an action based on any other of the remedies.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518 et seq.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 25:2231 (November 1999).

Chapter 7. Consulting and Providing Legend Drugs and Certain Controlled Substances

§704. Consulting and Providing Legend and Certain Controlled Substances

A. Legend Drugs

1. When an animal control agency which is operated by a state or local governmental agency or which is operated by any duly incorporated humane society which has a contract with a local governmental agency to perform animal control services on behalf of the local governmental agency seeks to administer legend drugs to an animal for the sole purpose of animal capture and/or animal restraint, the animal control agency must have a staff or consulting veterinarian who is licensed to practice veterinary medicine by the board and who obtains the legend drugs.

2. Said legend drugs must be stored and administered under the general supervision of the licensed veterinarian. General supervision means that the licensed veterinarian must provide the employee(s) of the animal control agency with written instructions and follow-up assistance on the proper storage, use and administration of the drug(s) being provided.

3. The licensed veterinarian may submit to the board, for review and/or approval, a written protocol of his supervision of the animal control agency's employees.

4. The licensed veterinarian shall also require the animal control agency's employees to maintain record keeping logs which shall include, but would not be limited to, the following:

a. date of each use of a legend drug;

b. species of animal;

c. estimated weight of animal;

d. dose administered;

e. name of animal control officer administering the drug.

5. Said records should be reviewed by the supervising veterinarian on at least a quarterly basis.

B. Telazol (Tiletamine HCl and Zolazepam HCl) and Ketamine (Ketamine HCl)

1. When an animal control agency which is operated by a state or local governmental agency or which is operated by any duly incorporated humane society which has a contract with a local government agency to perform animal control services on behalf of the local governmental agency seeks to administer the controlled substance Telazol (tiletamine HCl and zolazepam HCl) or Ketamine (ketamine HCl), to an animal for the sole purpose of animal capture and/or animal restraint, the animal control agency, unless it has a Lead CAET as defined in R.S. 37:1552(4), must have a staff or consulting veterinarian who is licensed to practice veterinary medicine by the Board of Veterinary Medicine and who is registered with the Drug Enforcement Administration (DEA) and licensed by the state controlled dangerous substances program at the shelter location where the drugs will be stored and administered who obtains, and who is responsible for, the Telazol (tiletamine HCl and zolazepam HCl) or Ketamine (ketamine HCl) used.

2. A storage and use plan for Telazol (tiletamine HCl and zolazepam HCl) and Ketamine (ketamine HCl) which meets or exceeds the requirements of all federal or state drug enforcement agencies (including storage of controlled substances in a securely locked, substantially constructed cabinet and the keeping of a perpetual inventory as required by LAC 48:I.Chapter 39) and the record keeping requirements of this Chapter shall be submitted to the Board of Veterinary Medicine for approval.

a. This usage plan shall include a requirement that each use of Telazol (tiletamine HCl and zolazepam HCl) and Ketamine (ketamine HCl) shall be documented for review by the licensed veterinarian responsible for the purchase and inventory of that drug.

b. This usage plan shall include a requirement that this documentation include, but not be limited to:

i. date of each use of the drug;

ii. species of animal;

iii. estimated weight of animal;

iv. dose administered;

v. name of animal control officer administering the drug;

vi. a constant (running) inventory of the drug present at the facility.

c. This usage plan shall include a requirement that a review of each use of Telazol (tiletamine HCl and zolazepam HCl) and Ketamine (ketamine HCl) shall be made by the responsible veterinarian and that said veterinarian shall initial the usage log entries to indicate this review. A review of the usage plan shall be made at least quarterly and the quantities of the drug used and on hand shall be tallied and authenticated. Any variance shall be noted in the log and steps should be taken and documented to correct the problem.

d. This usage plan shall include a requirement that any removal of Telazol (tiletamine HCl and zolazepam HCl) or Ketamine (ketamine HCl) from the securely locked, substantially constructed cabinet shall be in

minimal amounts, shall be maintained in a locked container when not in use, and shall be documented in a manner to include, but not be limited to:

i. a signed log indicating the person removing the drug;

ii. the date on which the drug was removed;

iii. an accounting for all drug used and the amount returned;

iv. the date on which the remaining drug was returned and the signature of the person returning it.

C. A licensed veterinarian who chooses to assist an animal control shelter in the methods *prescribed* in §704 shall be solely responsible for which drugs he or she is willing to provide and in what quantities.

D. Section 704 does not pertain to any controlled substances listed in any DEA classification schedule or state of Louisiana classification schedule, except Telazol (tiletamine HCl and zolazepam HCl) and Ketamine (ketamine HCl). This Section specifically does not apply to sodium pentobarbital, which is regulated for animal control agency use in R.S. 37:1551-1558.

E. The definitions found in §700 shall apply to all terms used in §704.

F. Failure of a licensed veterinarian to comply with any and all provisions of §704 shall be considered a violation of the rules of professional conduct. Said veterinarian may be subject to disciplinary action as provided for in R.S. 37:1518 and 1526.

AUTHORITY NOTE: Promulgated in accordance with R.S. 37:1518.

HISTORICAL NOTE: Promulgated by the Department of Health and Hospitals, Board of Veterinary Medicine, LR 20:666 (June 1994); amended LR 24:334 (February 1998), LR 25:519 (March 1999), LR 26:317 (February 2000).