

Controlled Drugs and Premises Permits What Shelters Need to Know



Bruce Wagman, JD - Shelter PALS at San Francisco SPCA

Cindi Delany, DVM - Maddie's[®] Million Pet Challenge at UC Davis Koret Shelter Medicine Program



Meet Your Experts



Bruce Wagman, JD Shelter PALS at San Francisco SPCA





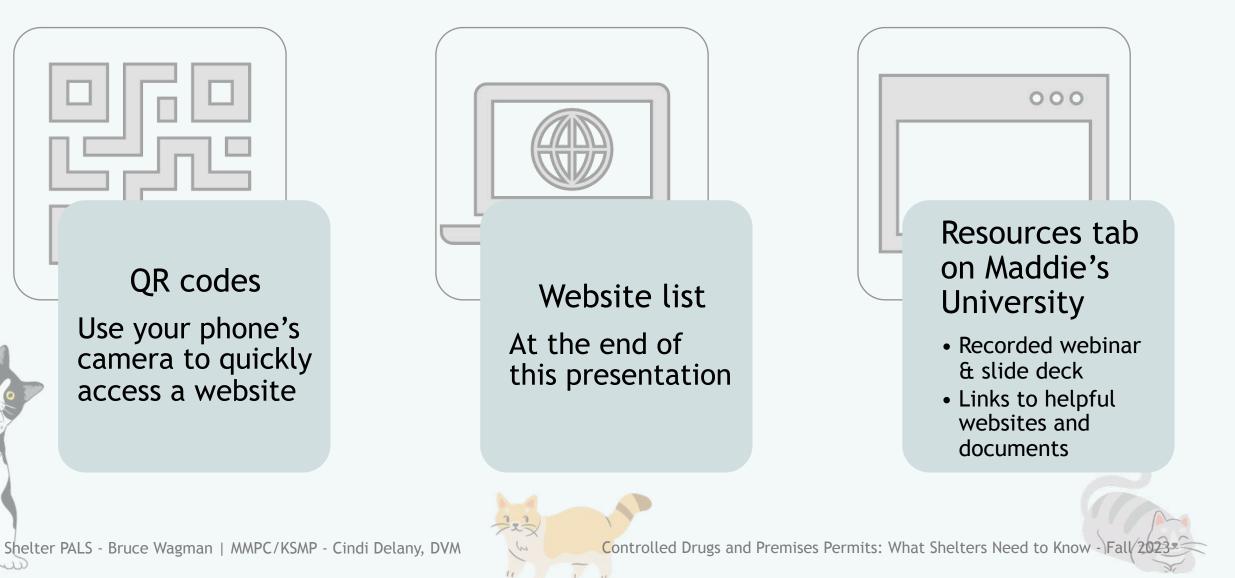
Cindi Delany, DVM Maddie's® Million Pet Challenge at UC Davis Koret Shelter Medicine Program

How to Use the QR Codes

- 1. Open your cell phone's camera and point it at the QR code
- 2. Click the link that appears on your screen in yellow
- 3. Your phone's browser will open and take you to the website/resource



Presentation Resources



Partners and Collaborators





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Participate During the Webinar!

1. Go to: https://pollev.com/mmpclearniverse101

OR

2. Scan this QR code with your phone:



(SAME QR code for all poll questions - questions will be sent to your cell phone)

3. Text "mmpclearniverse101" to this number - 37607 and poll questions can be answered by text.

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What's your role?	
what's your role:	
Veterinarian	
	0%
RVT	
	0%
Shelter Director	0%
Shelter Management	
	0%
Other - Drop it in the Chat	
	0%
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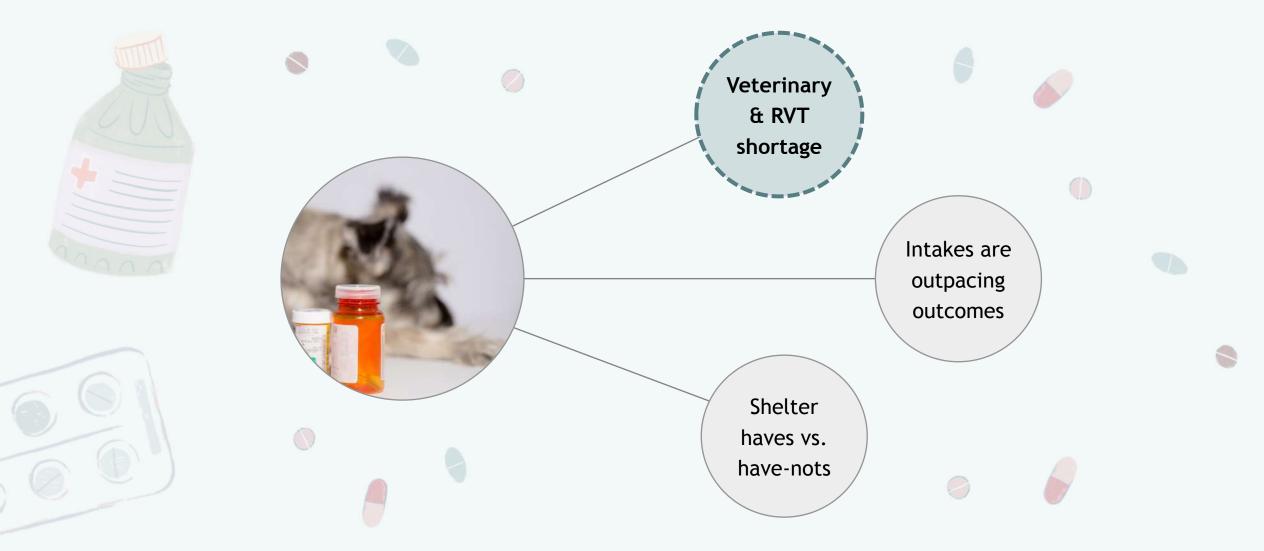


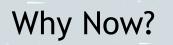






Why this topic? Why now?





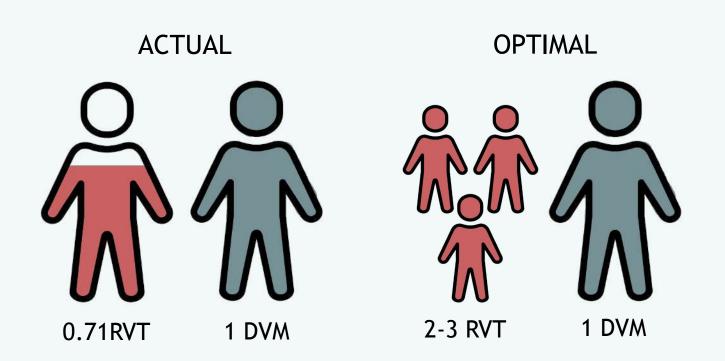
Veterinary/RVT Shortage

By the numbers....

CA Licensed DVMs 2023 - 11,277

CA Licensed RVTs 2023 - 8,009

Bottom line - less than 1 RVT per DVM (in most practices/shelters a ratio of 2 or 3 RVTs per DVM is recommended for maximum efficiency)



Why Now?

Veterinary/RVT Shortage -Access to Veterinary Care in California Animal Shelters Survey Results

Access to Veterinary Care in California Animal Shelters

The Program for Pet Health Equity, University of Tennessee



Introduction

Inequitable access to veterinary care has been called the greatest threat to companion animal welfare of our generation. While some research has focused on the lack of access to care for owned pets, very little (if any) exists that focuses on the access to care challenge for animal shelters. This project aims to shed light on this aspect of the challenge. With a geographic focus on California, we set out to answer three key questions:

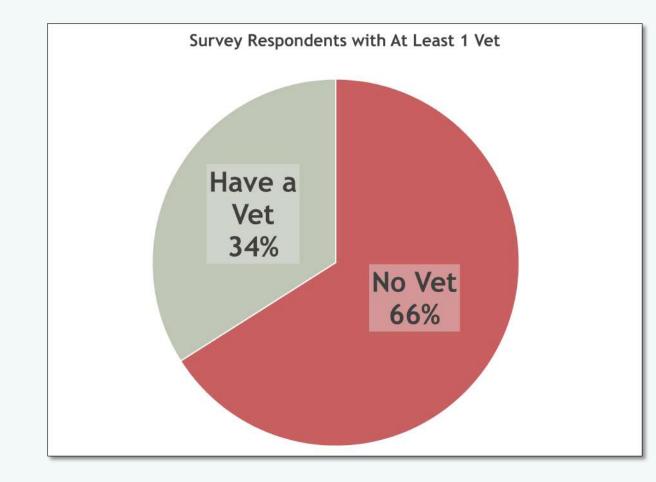
- Do animals shelters in California indicate that they are experiencing a lack of access to veterinary care?
- 2. What types of care can or cannot be provided?
- 3. What are the effects of the shelters' lack of access to veterinary care?

To probe these questions a survey was administered to the leaders of animal welfare organizations in California. The results are summarized here.



https://tinyurl.com/VetCareAccessSurvey

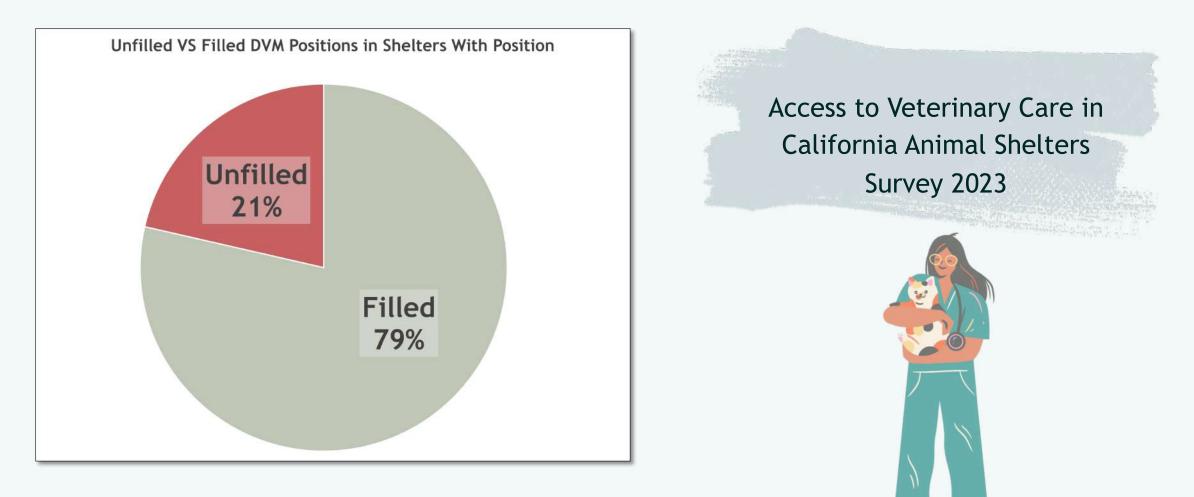
Veterinary/RVT Shortage - Shelters That Have DVM(s)



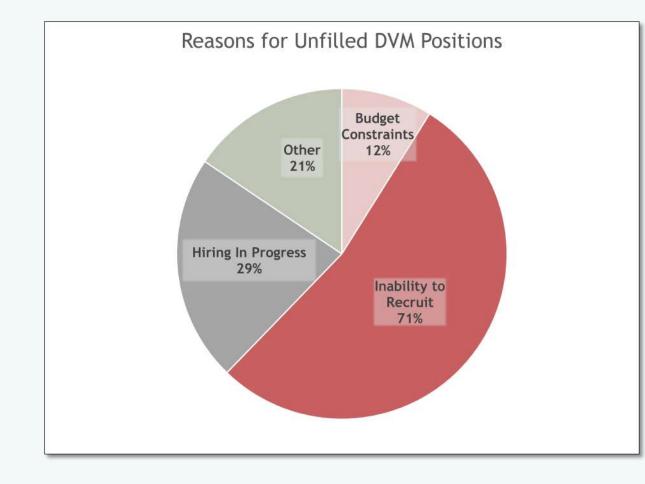
Access to Veterinary Care in California Animal Shelters Survey 2023

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Veterinary/RVT Shortage - Unfilled Shelter DVM Positions



Veterinary/RVT Shortage - Reasons for Unfilled DVM Positions

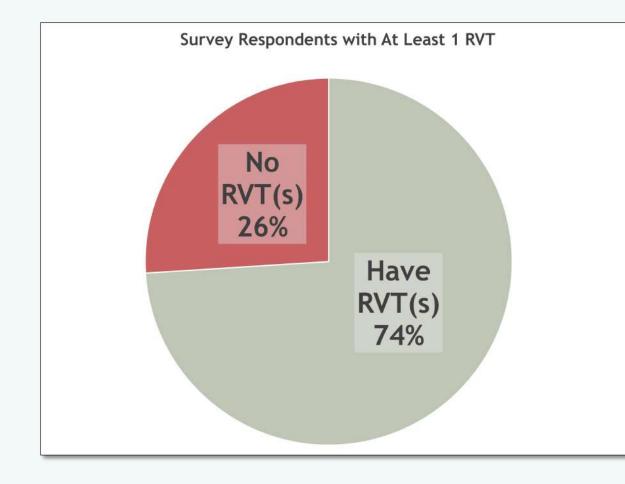


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Veterinary/RVT Shortage - Shelters That Have RVT(s)

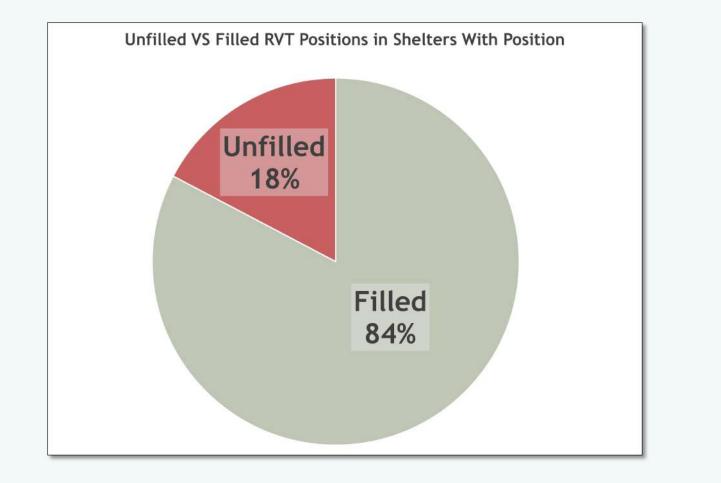


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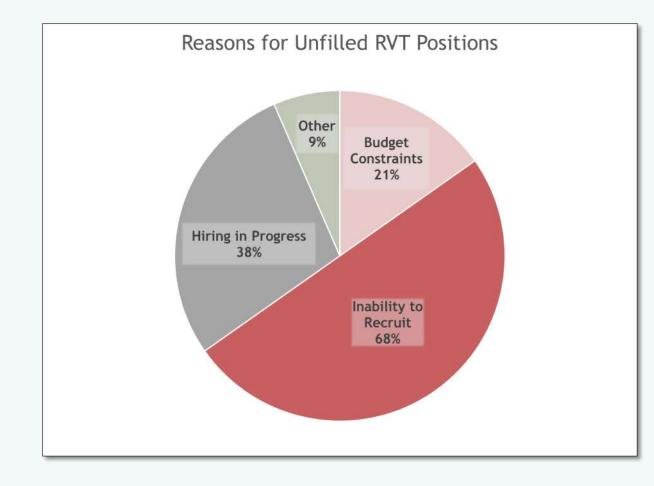
Veterinary/RVT Shortage - Unfilled Shelter RVT Positions



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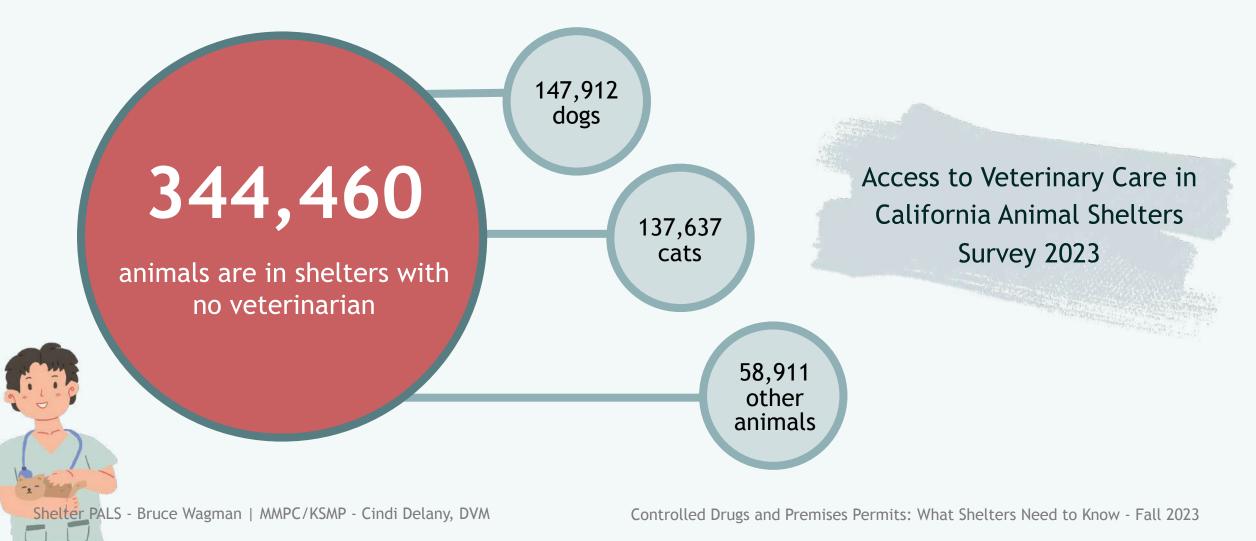
Veterinary/RVT Shortage - Reasons for Unfilled RVT Positions



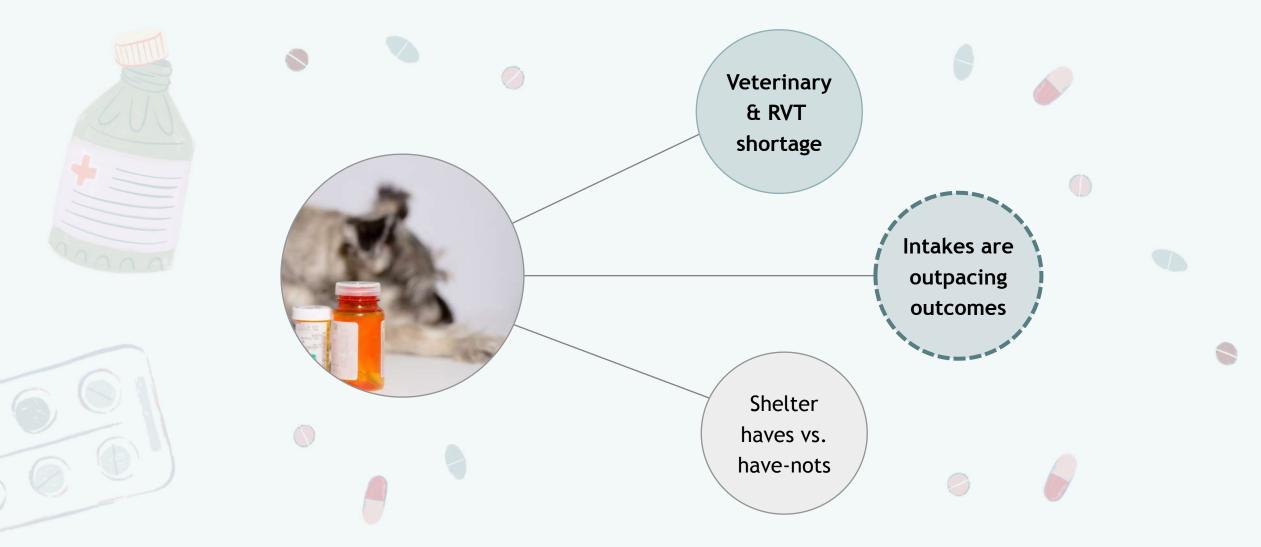
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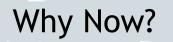
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Veterinary/RVT Shortage - Impact on Animals in Shelters



Why this topic? Why now?





Intakes Are Outpacing Outcomes

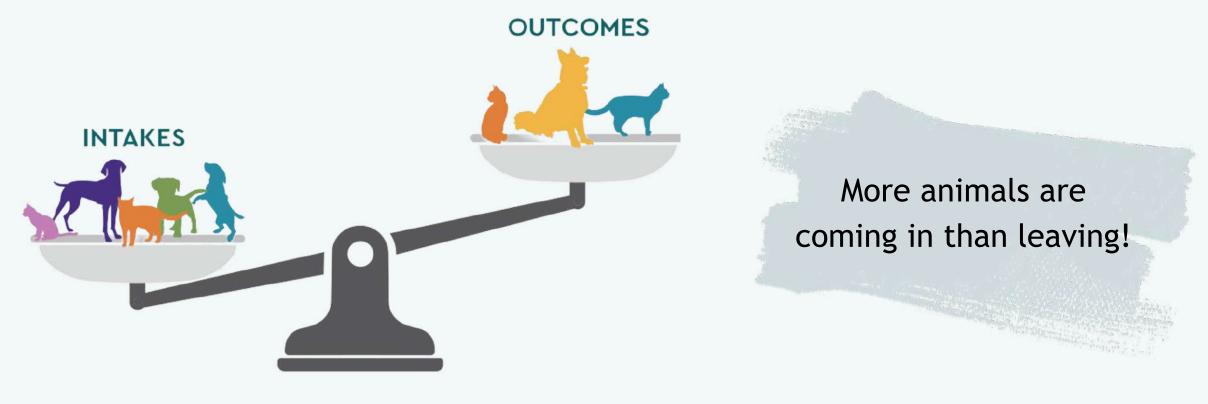


Image source: https://www.shelteranimalscount.org/pbc

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Population Balance Defined

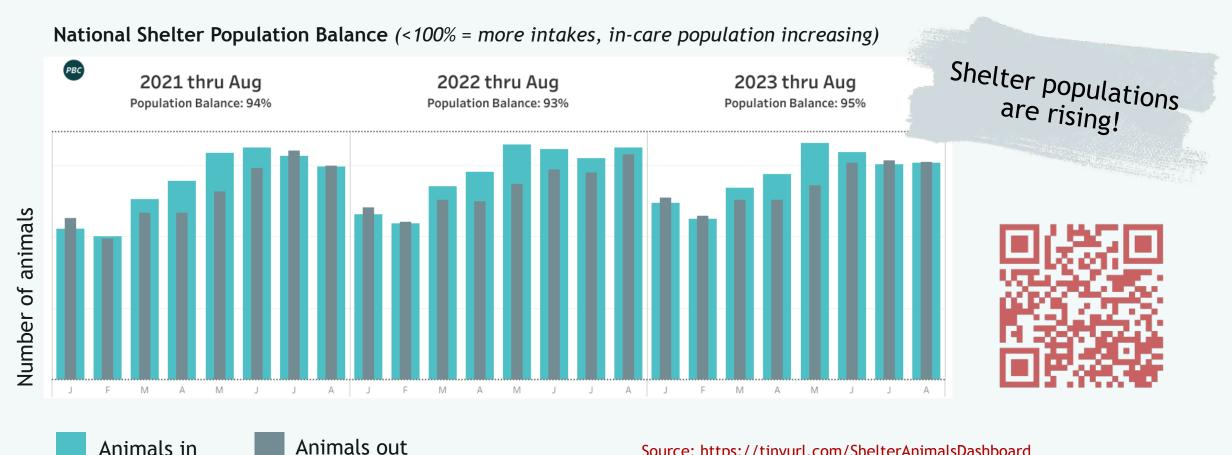
Population balance tells us if a shelter's population is increasing, decreasing, or staying the same.

It's calculated by the total outcomes divided by the total intakes.

100% means intakes = outcomes.Population is STAYING THE SAME.<100% means more intakes than outcomes.</td>Population is INCREASING.>100% means more outcomes than intakes.Population is DECREASING.

Why Now?

Past 3 Years More Animals In Than Out

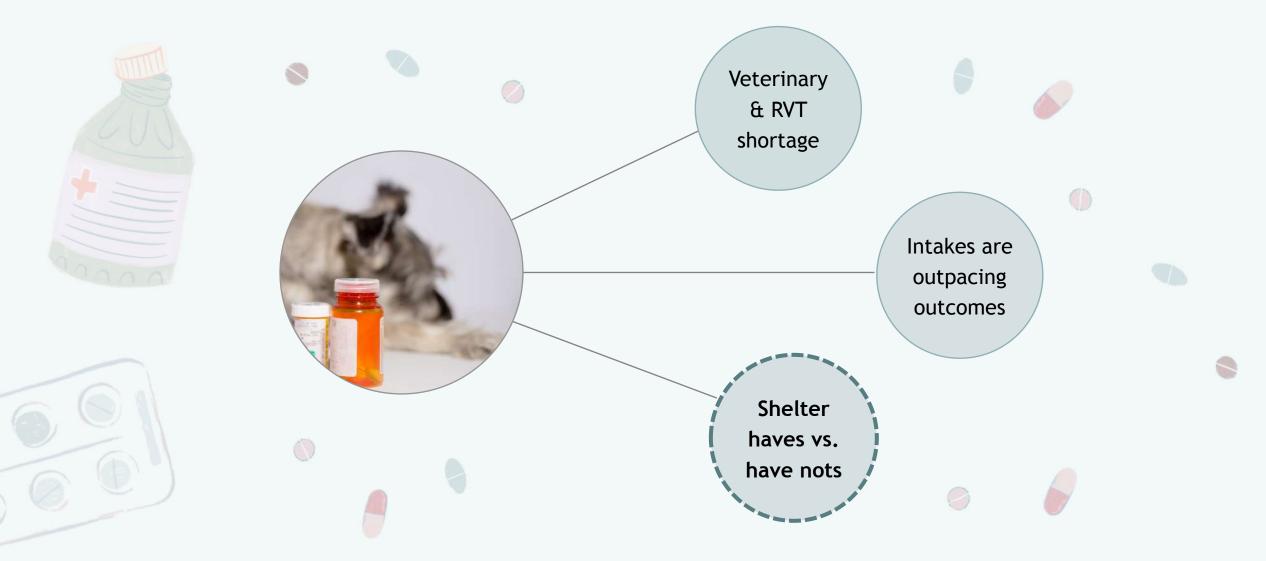


Animals out

Source: https://tinyurl.com/ShelterAnimalsDashboard

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Why this topic? Why now?



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Why Now?

Shelter Haves Versus Have-Nots



Access to veterinary care can vary across communities. It can also vary across shelters.

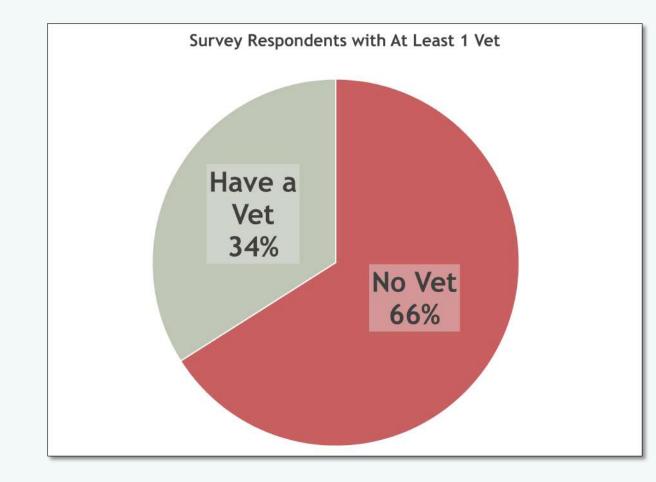


Factors include:

- •Geography
- •Urban vs rural
- •Socioeconomics (income levels)

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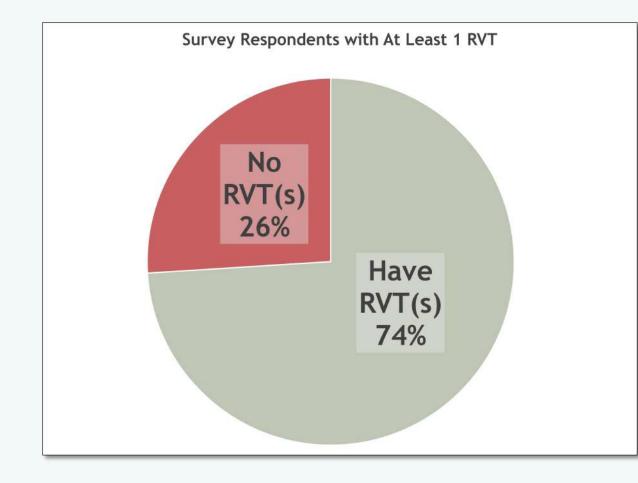
Veterinary/RVT Shortage - Shelters That Have DVM(s)



Access to Veterinary Care in California Animal Shelters Survey 2023

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Veterinary/RVT Shortage - Shelters That Have RVT(s)



Access to Veterinary Care in California Animal Shelters Survey 2023



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Why Now?

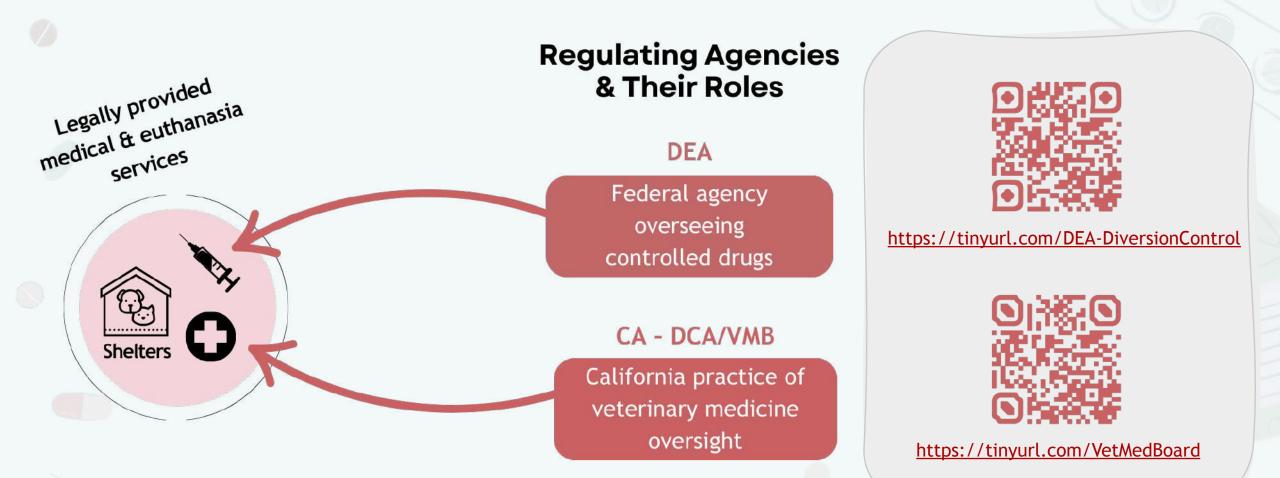
Veterinary Desert Defined

A veterinary desert is an area where access to pet healthcare services is limited, making it challenging for pet owners to ensure their animals receive proper medical care.

This is more common in lower income areas, making affordable veterinary care options scarce.

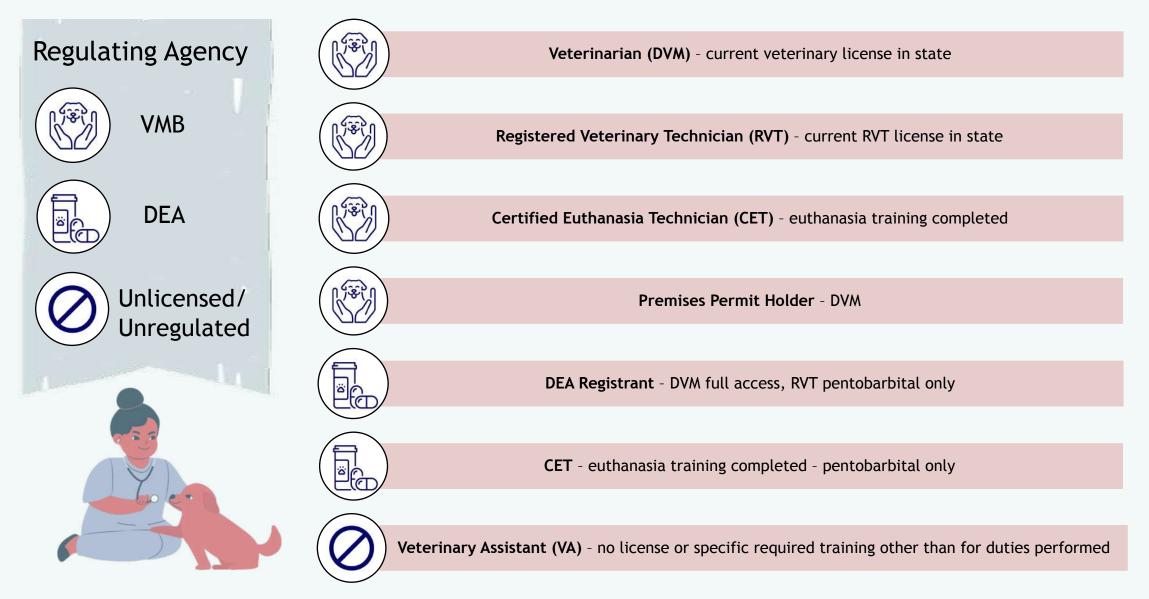


Roles, Regulations, and Oversight



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Staff Roles and Intersections



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DEA - Who They Are, What They Do

United States Department of Justice Drug Enforcement Administration Diversion Control Division

www.DEAdiversion.usdoj.gov

Practitioner's Manual

AN INFORMATIONAL OUTLINE OF THE CONTROLLED SUBSTANCES ACT



https://tinyurl.com/DEA-Manual

Revised 2023¹

1 This manual replaces all previous editions of the Practitioner's Manual issued by the Drug Enforcement Administration both hard copy and electronic.

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DEA - Controlled Drugs

- Most shelters with veterinarians/premises permits can obtain DEA registration for all drugs that have valid medical uses (excluding Schedule 1 drugs).
- Let's look at controlled drugs commonly used in animal shelters and their classifications when applying for a DEA registration.



SOURCE:

https://tinyurl.com/DEA-Schedules

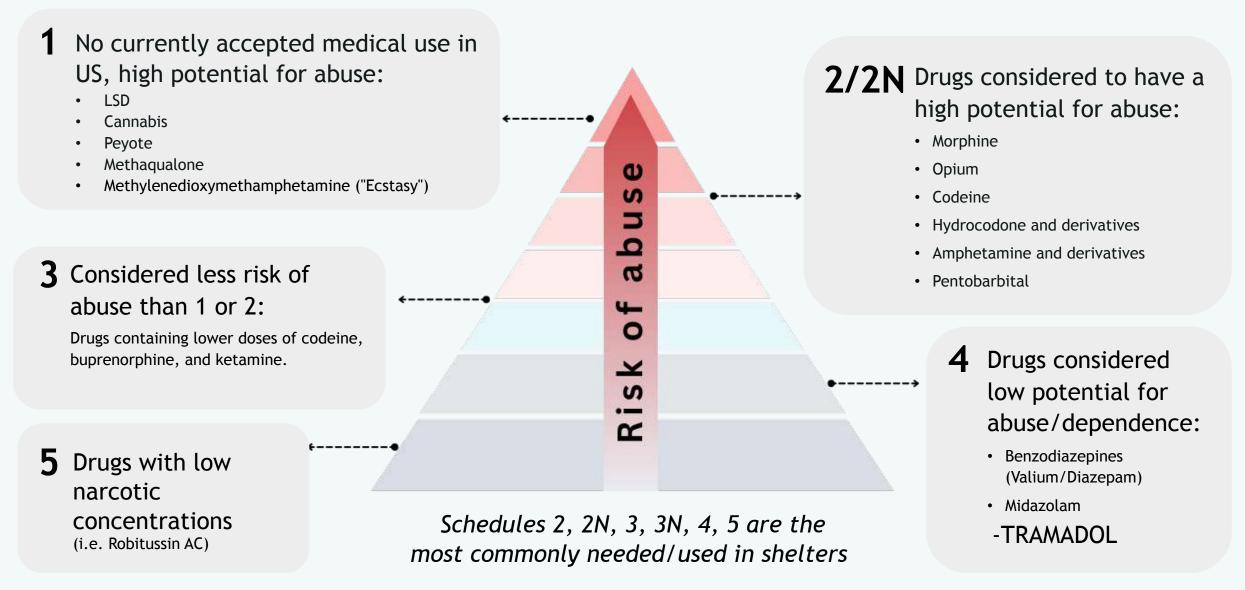




hich of these IS a controlled drug at this time?	
(A) Xylazine	0%
(B) Propofol	
	50%
(C) Dexmedetomidine	0%
(D) Isoflurane	
	0%
(E) Acepromazine	0%
(F) Gabapentin	
	50%
(G) Trazadone	0%
(H) NONE of these are controlled.	070
	0%
Start the presentation to see live content. For screen share software, share the entire screen. Get help at pollev.com/app	



Schedules of Controlled Drugs



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Non-Controlled Prescription Drugs

These drugs with sedative to anesthetic effects are often used in shelters and are not currently controlled.

- Dexmedetomidine
- Propofol
- •Acepromazine
- •Xylazine
- Isoflurane (inhalant anesthetic)
- •Gabapentin
- Trazodone



DEA - Registrants

Only licensed veterinarians are eligible for a full DEA registration (license) which provides them with the authority to prescribe, order, and administer any drugs available under their registration (typically Schedules 2-5).

Special allowance for DEA registration *only for sodium pentobarbital* by shelter RVTs (discussed later in webinar).

Bottom line - Full access DEA registrant in the animal shelter context must be a DVM.

DEA requires a medical license from the shelter itself, (administrators/leadership, RVTs and CETs cannot hold a full access DEA license).

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DEA - Prescription, Procurement and Administration of Controlled Drugs



Prescription of controlled drugs

- DEA licensee ONLY
- DVM ONLY (location specific license +/- mobile if premises permit for that)

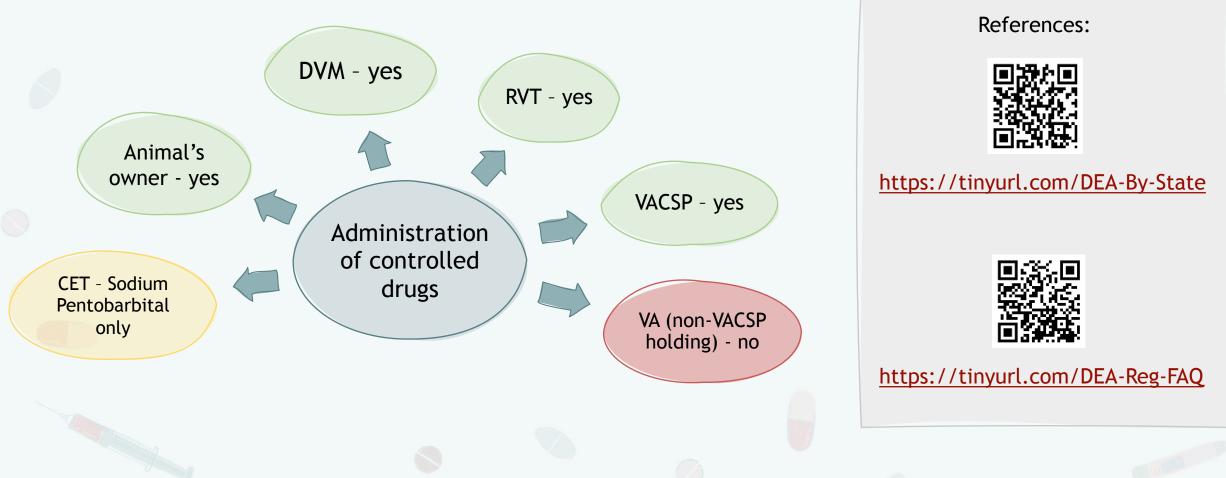


NOTE: DVMs without a DEA-223 registration are limited to administering and dispensing only.

- Non-registrant DVMs cannot prescribe controlled substances without their own individual DEA registration.
- REF: <u>https://tinyurl.com/VMB-Controlled-Drugs</u>



DEA -Administration of Controlled Drugs



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What is a "Veterinary Assistant Controlled Substances Permit" (VACSP)?

VACSP from the VMB

Veterinary Assistants (anyone the shelter has trained in the veterinary-related duties they are assigned - no license required).

Allows them to obtain and administer controlled substances under the supervision of a licensed manager/supervising veterinarian.



https://tinyurl.com/VACSP-FAQ

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DEA - Registration Locations/Renewal



License is for 1 physical address where practice is performed and subject to inspection

License is for dispensing in the state that the location is in based on medical state license



Each location must have its own DEA registration



REF: https://tinyurl.com/DEA-Registration



DEA permits use in mobile setting pursuant to Veterinary Mobility Act of 2014. Allows DVMs to transport and dispense at site other than primary registered location (even different state IF DVM is licensed to practice in that state)



REF: https://tinyurl.com/VetMedMobilityAct

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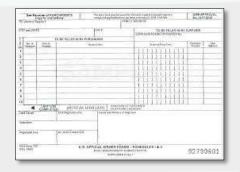
DEA - Ordering Controlled Drugs - Schedule 2

(Schedule 3-5 just have DEA on file with supplier)

Paper Form vs Online

Controlled Drug Ordering Mail in Paper Form

Single sheet DEA 222 Order Form



Recommended! Faster, more efficient.



Online Controlled Substance Ordering System (CSOS)

Secure electronic transmission of controlled substance orders without paper DEA 222 form.

Each individual purchaser must enroll with DEA to acquire a CSOS Digital Signing Certificate.

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VMB Controlled Drugs Regulation FAQ



Registrants are required to keep records and file reports

Activities to Record - controlled substances dispensed and administered Record of all prescribed medications including, dose, frequency, quantity, in medical record.



How are records kept? - 1 set for Schedule 2, 1 set for Schedule 3, 4, 5



Kept at least 2 years from date of each inventory or record OR 3 years from animal's last visit - whichever is greater



https://tinyurl.com/VMB-Controlled-Drugs

On arrival:

- Schedule 2 close out order form if 222 ordered
- Label drugs appropriately (sequential numbers each drug type)
- Log Arrival on Invoice (and keep copy of invoice with drug log):
 - On invoice record:
 - Date shipment received
 - For each type:
 - # of Bottles
 - Lot #
 - Expiration Date
 - # Assigned to bottles
 - 2 sets of initials for receiving is recommended



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Closed Bottle Log Sheet - Written, Typewritten, Software Logged or Printed (ideally "not prone to tampering")

- Drug Name
- Schedule
- Strength
- Size
- Date
- Bottle #
- Lot #
- Removed
- Added
- On-Hand
- Initials

Drug Name:	Schedule: Concentration/Strength:												Log Page #:		
Data	Time	Received From (Suppliar)	Form (Bottle ar other)	Each Containing (Ex. 100 mls)	Bottle #'s Assigned	Initial Amount (Bottles or Other)	Amoun 1 Acideci (Bottles or Other Form)	Amount Removed for Use (bottles or other form)	Balance in Closed Inventory	tritials	Inventory Check Date	Inventory Check initials	Note#		
				Balance from previo	ous page										
Note #	Note											Initials #1	Initials #2		

Controlled Drugs and Premises Permits: What Shelters Need to Know - Fall 2023

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Drug inventory - Open Bottles usage

- Log opening of bottle from "Closed Bottle Log"
- Enter into open bottle log for usage
- Each drug own open bottle log pages
- Each log includes:
 - Drug Info Top Drug Name, Schedule, Strength/Size
 - Usage Info as prepared for use (or to dispense)
 - Animal Name/ID
 - In-Shelter or Dispensed
 - Owner Info ID/Last Name
 - Pull address from software when reporting to CURES.
 - Date
 - Bottle #
 - Amount Removed
 - Amount Wasted
 - Balance
 - Initials

Drug Name:	Schedule:				Concentration/Strength:					Log Page Start Date:					Log Page #:		
Date	Animal ID	Animal Name	Ówner ID	Ówner Last Name	in-Shelter Use	Dispensed Out of Shelter	Reason (Ex. Spay, neuter, foxtail)	Bottle #	Amount Drawn	Amount Wasted	New Bottle Added Amount	Running Balance	Initials	Reconciled	Discrepancy Amt (if any)	Note #	
				Bala	nce from pr	evious page											
xe #	Note														Initials #1	Initials #	

Controlled Drugs and Premises Permits: What Shelters Need to Know - Fall 2023

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Store appropriately - Class 2 should be stored separately from Class 3-5

- Double-locked cabinet secured either to the floor or wall
 - 2 Keys are not supposed to be in the same person's possession
- Refrigerated drugs should be secured in the refrigerator within a locked box

More info: https://tinyurl.com/DrugManagementTips

https://tinyurl.com/ASPCADrugGuide







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VMB - Required Drugs Inventory

Inventory Record of all controlled substances at registered location specifying "close of business" or "opening of business"

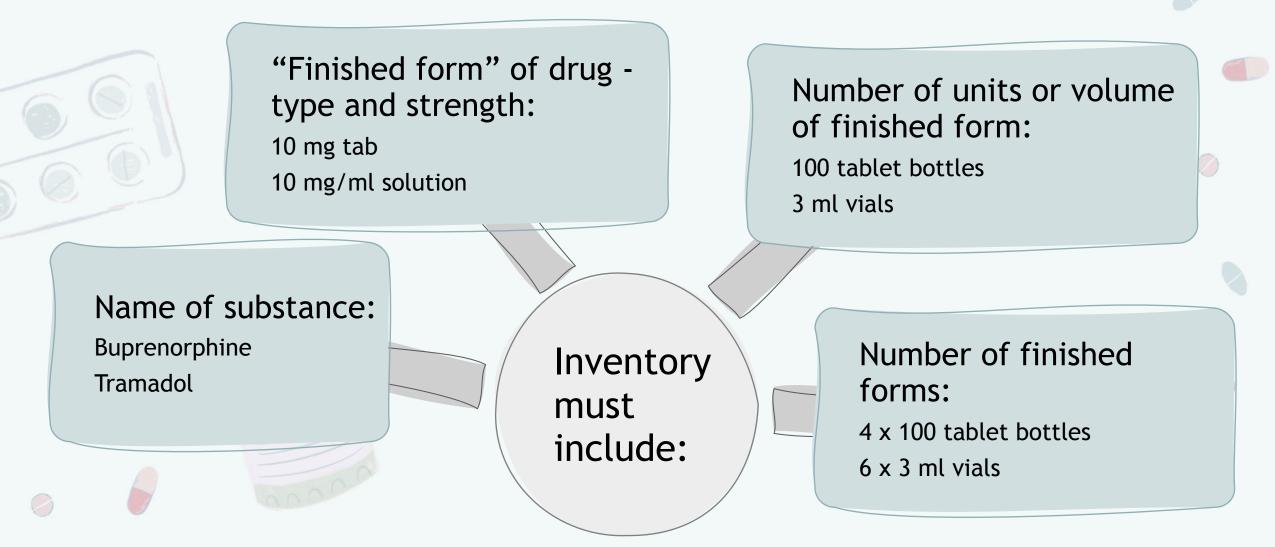
Initial inventory when first commence practice at the location

New and complete inventory every 2 years

Shipping/purchase records - acquired from - name, address, reg #



VMB - Inventory Requirements



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VMB - Controlled Drugs - Dispensing

Veterinarians are considered dispensers

Dispensing records (for drugs sent out of shelter) must include:

- Name of substance
- Finished form and number of units/volume i.e. 14 x 10 mg tablets
- Name and address of client dispensed to
- Date dispensed
- Name or initials of person dispensing or administering on behalf of registrant
- If drugs received from or dispensed to another registrant must include name, address and registration number of that person
- If drugs disposed (i.e. expired) include # of units disposed

Medical record must contain - dosage, quantity and frequency of all drugs dispensed.



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VMB - Controlled Drugs -Outside Pharmacy



To prescribe through outside pharmacy - must have:

- Valid CA vet license
- DEA in own name
- Be registered with CURES <u>https://tinyurl.com/CURES-Registration</u>
- CII drugs require CA DOJ secure form from licensed printer, no refills
- oral or electronic only if emergency and written must follow within 7 days
- CIII-V CA compliant secure form okay to submit orally or electronically
- Must be in medical record and must be kept for 3 years





Reporting:

- Schedules 2, 3, 4 must be reported within 1 working day of dispensing (as of 2021)
- Report via CURES (Controlled Substance Utilization Review and Evaluation System) https://tinyurl.com/CURES-Reporting
 online reporting system



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VMB - Controlled Drugs -Dispensing Outside Shelter

CURES - applies to controlled drugs dispensed outside the shelter - sent with the animal to adopters, redeeming owners, fosters, rescue/transfer partners.

CURES Log must include:

- Prescribers name, address, telephone number, state license # and DEA number
- Date, quantity, drug name, NDC #, strength, clients full name, DOB, gender, address, animal name, reporting month/year, data submitted
- Rx's filled by outside pharmacies should NOT be reported to CURES (done by pharmacist)
- Theft and loss "significant" must be reported within 1 business day



https://tinyurl.com/CURES-Reporting

VMB - Controlled Drugs -Dispensing Outside Shelter

Who can have access to and dispense in shelter?

- DVM, RVT, VACSP's access and administer
- Once in finished form (bottled and labeled to go home) may be handled by VA or receptionist during transaction to an owner (or foster or adopter)



VMB - Controlled Drugs - Disposal

Disposal of expired reverse distribution with **licensed reverse distributor**

Controlled drugs cannot be returned to prescribing or dispensing DVM for disposal.

End users of unwanted or expired can use drug takeback programs.

DEA registrants cannot use drug take-back programs.

Disposal and pick-up of EMPTY - sharps container

Use agencies such as Koefran.

IMPORTANT - do not accept donated controlled drugs!

Not from the public, other clinics, or any other entity.

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Controlled Drugs - DEA Registrant Leaves

- DEA Registrant is responsible for any controlled drugs ordered on their DEA registration.
- If Registrant leaves a practice or shelter 3 choices:
 - 1. Registrant takes them with them to a new registered location.
 - 2. Registrant transfers them to another DEA registrant.
 - 3. Registrant destroys them using a reverse distributor.



Pharmacies, DEA# & Non-Controlled Drugs

Why might a pharmacy/supplier want your DEA # for non-controlled substances?

- Many software systems use this in lieu of an NPI (National Provider Identifier #).
- Veterinarians are not eligible for an NPI and software may not allow Rx filling without one of these #'s.

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What about shelters that don't have a premises permit?



Can You Obtain and Give Medications in Shelters without Premises Permits?

Without a premises permit can you:

- Obtain prescription medications?
- Give drugs to prevent the spread of communicable diseases?
- Give treatment/preventatives for fleas/ticks/worms?



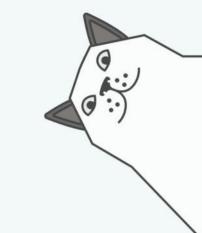
How to Obtain and Give Medications in Shelters without Premises Permits



A prescription, **not a premises permit**, is required to obtain prescription medications



Veterinarians may be willing to prescribe standard drugs for shelters and **"herd health"** even though they are not willing to be licensed managers for a premises permit



Administering Medications in Shelters Including those that don't have a premises permit.

As long as you can **legally obtain** the medications, they may be administered in the shelter For animals owned by the shelter, just need a veterinarian to prescribe the medications

For privately owned animals veterinarians still need owner consent to prescribe or direct administration of drugs Any shelter employee or volunteer can administer the medications

Subject to specific exceptions

Euthanasia drugs have additional exceptions (covered later in this webinar)

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Animal Care Without a Premises Permit

Providing Care: Shelters that aren't registered (no premises permit) must follow specific rules for taking care of animals.

- Vaccinations: Shelter staff can give non-prescription vaccinations, as long as a vet's instructions are followed, and staff is properly trained.
- Non-Prescription Medications: Shelter staff can provide non-prescription medications to control parasites (like fleas or ticks) based on a vet's guidance, as long as they are trained to do so. This doesn't mean they are diagnosing the animal's condition.
- **Prescription Medications:** Shelter staff can give prescribed medications if they have a written plan from a licensed vet and follow proper training.

Shelters not registered with the board must report any severe issues or deaths caused by the care they provide, such as injuries, infections, or bad reactions to vaccines or medicines.



This rule took effect in 2022 due to AB 1535.

Euthanasia in Shelters

The euthanasia drug, sodium pentobarbital, is treated separately from other controlled drugs under the law.

Also covered under BPC 4827.

Any shelter team member can euthanize "sick, injured, homeless, or surrendered" pets with "proper training."

• Upon completion of required euthanasia training, the individual is a "Certified Euthanasia Technician" (CET)

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Staff Training Required in Shelters Without Premises Permits

In shelters without premises permits, staff is required to have proper training in order to give vaccinations, non-prescription and prescription medications

Proper training:

- Completing a four-hour training given by a veterinarian licensed in the state.
- Covering topics such as:
- Intake procedures
- Preventative medicine
- Recognizing when a veterinarian is needed.
- Prescription and nonprescription medications.
- Humane animal restraint techniques.
- Vaccination injection methods and procedures.
- Medical related documentation.



Proper Training for Euthanasia

"Proper training" for euthanasia requires:

Veterinarian, RVT, or "certified instructor"

8 hours minimum

Under combined California and federal law, Registered Veterinary Technicians can register with the DEA to order *only sodium pentobarbital* for use in euthanasia in shelters.

> Note that any Certified Euthanasia Technician can *administer* sodium pentobarbital, but only RVTs or veterinarians who are registered with the DEA can order the drug.

Curriculum maintained by CalAnimals <u>www.tinyurl.com/CalAnimalsTraining</u>



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California Veterinary Medical Board (CVMB)

The CVMB is a state agency under the Department of Consumer Affairs

Protects consumers and animals through oversight of veterinary professions - DVMs, RVTs, and VACSPs

- Licensing
- Certifications
- Enforcement/punishment

Issues premises permits for veterinary hospital settings, including shelters and mobile clinics where veterinary medicine is practiced

- Reviews applications for premises permits
- Performs inspections to ensure compliance

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CVMB - Premises Permits

All locations where veterinary medicine is practiced **must have a premise permit** This includes most shelters, but the legislature has made some concessions for shelters without premises permits (earlier slides about BPC 4827)

Overseen by CVMB

"Owner/operator" must register



"Licensee/manager" must be a California veterinarian who acts "for and on behalf of the registered premises"



https://tinyurl.com/PremisesPermitInfo

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CVMB - Premises Permits - Inspections



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No Premises Permit? Attracting a Premises Permit Holder/DEA Registrant

No staff member DVM?

- 1 option work with a DVM to be your Premises Permit Holder/DEA Registrant
 - There are risks to the DVM their license!
 - They must be compensated.
 - Protocols and procedures will need to be developed.
 - Shelter management must ensure compliance of their staff with these.
 - Communications must be open and honest.
 - They must have control.
 - They must have access to your facility to ensure protection of their license.



No Premises Permit? Attracting a Premises Permit Holder/DEA Registrant

Some Options:

- Contract with a DVM for this for your shelter individually
- Share a DVM in this role across several smaller shelters
- Share a DVM with a larger shelter



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New Changes to the Law



Updates:

- AB 1399 Veterinary Telemedicine
 - Vastly expands the use of telemedicine to increase access to care for all pet owners. Signed by the Governor 10/8/23, effective 1/1/24.

• SB 669 Vaccine Clinics

 Removes prior restrictions on vaccination clinics, promoting greater protections for pets statewide. Signed by the Governor 10/13/23, effective 1/1/24.

CalAnimals On-Demand Recordings

Check out the excellent recorded webinars on CalAnimals and bolster your professional knowledge today!

https://www.calanimals.org/on



Finder to Foster to	Intake & Holding
Adoption: Keeping Found	Periods - Everything You
Animals in the Community	Ever Wanted to Know
2022.06.16 Bruce Wagman, Attorney,	2022.09.15 Bruce Wagman, Attorney,
and Cindi Delany, DVM	and Cindi Delany, DVM
View Recording	View Recording
CalAnimals	CalAnimals
Shelter PALS – Veterinary Care in Shelters: Who can legally do what?	Shelter PALS CA Shelter Law: Community Cats
2023.02.07 Bruce Wagman, Attorney,	2022.10.18 Bruce Wagman, Attorney,
and Dr. Cindi Delany	and Cindi Delany, DVM
View Recording	View Recording
SLIDES, if available	CalAnimals

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MMPC Maddie's University Course and Discussion Forum for Your Questions

Continue to decode compliance in this online course (with CE available -CAWA/NACA ready, RACE pending) and have any remaining questions answered on the Shelter PALS discussion forum on Maddie's University.

Decoding Compliance Course:

https://tinyurl.com/MU-DecodingCompliance

Discussion Forum:

https://tinyurl.com/MU-Discussion-Forum









Compliance: What You Need to Know about Controlled Drugs and Premises Permits in Your Shelter - Legal Considerations with Shelter PALS

Upcoming 2 Part Webinar Series:

What Does it Mean to Me? Translating laws/regulations into best practices to benefit you, your shelter, animals, and your community.

Join us for an easy, digestible (dare we say, "Fun") overview of how California laws and regulations apply to your animal shelter- and exactly what to do about it to improve what you're doing!

Register Now!

https://tinyurl.com/LegalBestPracticesRegister

Scheduled for:

Part 1: 12/6 - 10-11:30 am Pacific

Part 2: 12/13 - 10-11:30 am Pacific

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Shelter PALS Online Courses

Looking to deepen your knowledge of legal requirements around shelter staff and programs? These courses are for you!

https://tinyurl.com/ShelterPalsLegalCourses



Who Can Do What



Intake and Holding Periods



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Finder-Foster

Contact Information



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UCDAVIS KORET SHELTER MEDICINE PROGRAM



Learniverse

• Learniverse@sheltermedportal.com

- Bruce Shelters PALS
- shelterpals@sfspca.org
- https://www.sfspca.org/about/advocacy/

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Let Us Know What You Think!

Please take a moment to share your thoughts about this webinar.





https://tinyurl.com/DecodingComplianceFeedback

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DEA

- Diversion Control: <u>https://tinyurl.com/DEA-DiversionControl</u>
- Practitioners' manual on Controlled Substance Act: <u>https://tinyurl.com/DEA-Manual</u>
- Drug schedules: <u>https://tinyurl.com/DEA-Schedules</u>
- Practitioner certifications by state: <u>https://tinyurl.com/DEA-By-State</u>
- Registration Q&A: <u>https://tinyurl.com/DEA-Reg-FAQ</u>
- Veterinary Medicine Mobility Act: <u>https://tinyurl.com/VetMedMobilityAct</u>

VMB

- Veterinary Medical Board website: https://tinyurl.com/VetMedBoard
- Premises permit info, forms, and FAQ: <u>https://tinyurl.com/PremisesPermitInfo</u>
- VACSP FAQ: https://tinyurl.com/VACSP-FAQ
- FAQ for licensed vets on controlled substance admin: <u>https://tinyurl.com/VMB-Controlled-Drugs</u>
- Hospital Standards Self-Evaluation Checklist: https://tinyurl.com/VMB-Self-Checklist
- Inspections: <u>https://tinyurl.com/VMB-Inspections</u>

CalAnimals

- Animal Laws Handbooks (order online): <u>https://tinyurl.com/AnimalLawsHandbookCA</u>
- Training: <u>http://www.tinyurl.com/CalAnimalsTraining</u>

Veterinary Practice News

Tips for managing controlled substances: <u>https://tinyurl.com/DrugManagementTips</u>

CURES

- CURES Registration: <u>https://tinyurl.com/CURES-Registration</u>
- CURES Reporting: <u>https://tinyurl.com/CURES-Reporting</u>



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Maddie's University Online Education

Recording of this webinar + online course: https://tinyurl.com/MU-DecodingCompliance

- Shelter PALS courses: <u>https://tinyurl.com/ShelterPalsLegalCourses</u>
- Discussion forum: <u>https://tinyurl.com/MU-Discussion-Forum</u>

OTHER

• Guide to controlled drug management in high volume spay/neuter settings:

https://tinyurl.com/ASPCADrugGuide

Shelter Animals Count - Industry Trends Dashboard: https://tinyurl.com/ShelterAnimalsDashboard

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