

Board of Veterinary Medicine Guidance on Medical Recordkeeping

The Board of Veterinary Medicine often receives questions regarding medical recordkeeping requirements. The most frequently asked questions are included in this document.

- 1. Is a veterinarian required to maintain a record on every patient?**
- 2. May all records for the animals of one owner be filed together?**
- 3. Is a veterinarian required to use a specific format for documenting information in the record?**
- 4. May an assistant transcribe a medical record entry for a veterinarian?**
- 5. What is the length of time a medical record must be kept?**
- 6. When must a veterinarian release a medical record to the client?**
- 7. How may a record be amended?**
- 8. Do the requirements of the Health Insurance Portability and Accountability Act (“HIPAA”) apply to veterinary medical records?**
- 9. How should veterinary medical records be handled when closing or selling a practice?**

1. Is a veterinarian required to maintain a record on every patient?

A daily record of each patient treated must be maintained by the veterinarian. *See* 18VAC150-20-195. This includes a brief visit that may result in a referral or tentative diagnosis. Records for economic animals or litters of companion animals under the age of four months may be maintained on a per owner basis.

2. May all records for the animals of one owner be filed together?

The regulations do not address how to organize the daily record of each patient. The Board recommends that, if a master file is kept, then the record should have individual files contained within for each animal other than economic animals or litters of companion animals under the age of four months.

3. Is a veterinarian required to use a specific format for documenting information in the record?

No, regulations do not specify a format required for recordkeeping. The Board recommends using a problem-oriented (“SOAP”) format that allows any veterinarian, by reading the record, to proceed with the proper treatment for and care of the animal, and allows the Board or other agency to determine the advice and treatment recommended and performed by the practitioner.

The problem oriented veterinary medical record, or SOAP, format is the most widely-used format by the veterinary profession. It includes the following elements:

- The “S” in SOAP stands for subjective findings. These are things that are communicated by the client and recorded in the patient’s history, such as name,

age, date of visit, including vaccination history along with the current complaint. This information is essential in properly identifying the animal in the record and providing information that may be essential as the examination proceeds. For the most part, the information is accepted as true, but always be aware of incomplete information or inaccurate perceptions.

- The “O” or objective part of the record documents observations about the patient. It should include physical exam findings and everything seen, felt, touched, or smelled. Examples include, but are not limited to temperature, weight, body condition, assessment of all organs and data obtained by instrumentation.
- The “A” or assessment portion of the record uses the information gathered to formulate a diagnosis or tentative diagnosis in order to formulate a plan for each complaint.
- The “P” or plan portion documents the recommendations to the client. Communicating the recommendations is extremely important to aid in the client’s understanding of a *therapeutic plan* in which medications are prescribed or a *diagnostic plan* in which additional tests or information is needed to make a final diagnosis. The client’s decision to proceed or decline a therapeutic or diagnostic plan should be documented.

If an animal is hospitalized, an abbreviated version of the SOAP, including an assessment of the patient’s progress and condition can be added to the record daily.

4. May an assistant transcribe a medical record entry for a veterinarian?

There are no provisions restricting who transcribes a medical record entry. The veterinarian is required to maintain the record, regardless of who makes the entries. The Board recommends that the veterinarian sign-off on his entries.

5. What is the length of time a medical record must be kept?

Regulations require that a record be kept for a period of three years following the last office visit or discharge of such animal from a veterinary practice.

6. When must a veterinarian release a medical record to the client?

Failure to release patient records when requested by any of the following may be considered unprofessional conduct and may result in disciplinary action:

- the owner;
- law enforcement; or
- a federal, state, or local health regulatory agency.

Radiographs are required to be maintained as part of the patient's record. If an original radiograph is transferred to another establishment or released to the owner, a record of this transfer must be maintained on or with the patient's record.

7. How may a record be amended?

Regulations do not require a specific format for amendments. The Board recommends amending records by dating all information, including amendments, on the day entered rather than altering an original record.

8. Do the requirements of HIPAA apply to veterinary medical records?

No. HIPAA requirements only apply to human medical records.

9. How should veterinary medical records be handled when closing or selling a practice?

Virginia Code § 54.1-2405 specifies requirements for transfer of patient records to another location upon the sale or closure of a practice.

Section 54.1-2405 requires notification to current patients via mail or electronically and that notice be placed in a newspaper of general circulation within the veterinarian's practice area. "Current patient" is defined as a patient that has had an encounter with the provider or the professional practice during the two-year period immediately preceding the date of the record transfer. Failure to provide the two forms of notification may result in disciplinary action.

Pursuant to 18VAC150-20-181(C)(2), if there is no transfer of records upon sale or closure of an establishment, the veterinarian-in-charge shall provide the Board information about the location of or access to patient records.

References

Code of Virginia

[Va. Code § 54.1-2405](#), Transfer of patient records in conjunction with closure, sale, or relocation of practice; notice required

[Va. Code § 32.1-127.1:03](#), Health records privacy

Regulations Governing the Practice of Veterinary Medicine

[18VAC150-20-140](#), Unprofessional Conduct

[18VAC150-20-181](#), Requirements for veterinarian-in-charge

[18VAC150-20-195](#), Recordkeeping