

September 30, 2020
Virtual Meeting
1:00 p.m.

Agenda
Virginia Board of Veterinary Medicine
Inspection Committee Meeting

VIRTUAL MEETING

******Refer to Page 2 of the Agenda for Meeting Access Information******

Call to Order – Tregel Cockburn, D.V.M., Chair

Page 3

- Welcome and Roll Call
- Mission Statement

Ordering of Agenda – Dr. Cockburn

Public Comment – Dr. Cockburn

The Board will receive all public comment related to agenda items at this time. The Board will not receive comment on any regulatory process for which a public comment period has closed or any pending or closed complaint or disciplinary matter. (See **instructions on page 2 for providing public comment during virtual meeting.**)

Approval of Minutes – Dr. Cockburn

Pages 4-5

- February 20, 2020 – Committee Meeting

Discussion Items – Dr. Cockburn/Leslie Knachel

Pages 6-15

- Veterinary Establishment Inspection Update – **Melody Morton**
- Guidance Documents – **Ms. Knachel**
 - Review
 - 150-16: Protocol to follow upon Discovery of a Loss or Theft of Drugs (page 6)
 - 150-23: Disposal of Deceased Animals (page 7-8)
 - Discussion for Guidance Document for Conducting and Responding to Routine Inspections
- Review of suggested regulatory changes (pages 9-15) – **Ms. Knachel**
 - 18VAC150-20-30. Posting of licenses; accuracy of address.
 - 18VAC150-20-171. Specialty practice in a limited setting.
 - 18VAC150-20-180. Requirements to be registered as a veterinary establishment.
 - 18VAC150-20-181. Requirements for veterinarian-in-charge.
 - 18VAC150-20-190. Requirements for drug storage, dispensing, destruction, and records for all establishments Strategic plan for Committee moving forward.
 - 18VAC150-20-200. Standards for stationary veterinary establishments.
- Strategic planning for future meetings

New Business – Dr. Cockburn

Meeting Adjournment – Dr. Cockburn

This information is in **DRAFT** form and is subject to change.

Instructions for Accessing September 30, 2020 Virtual Full Board Meeting and Providing Public Comment

- **Access:** Perimeter Center building access remains restricted to the public due to the COVID-19 pandemic. To observe this virtual meeting, use one of the joining options below. Participation capacity is limited and is on a first come, first serve basis due to the capacity of CISCO WebEx technology.
- **Written Public Comment:** Written comments are **strongly preferred** due to the limits of the electronic meeting platform and should be submitted by email to leslie.knachel@dhp.virginia.gov no later than 12:00 noon on September 29, 2020. The written comments will be made available to the board members for review prior to the meeting.
- **Oral Public Comment:** Oral comments will be received during the full board meeting from persons who have submitted an email to leslie.knachel@dhp.virginia.gov no later than 12:00 noon on September 29, 2020, indicating they wish to offer oral comment at the board meeting. Comment may be offered by these individuals when their names are announced by the meeting chair.
- Public participation connections will be muted following the public comment periods.
- Should the Board enter into a closed session, public participants will be blocked from seeing and hearing the discussion. When the Board re-enters into open session, public participation connections to see and hear the board meeting will be restored.
- Please call from a location without background noise.
- Dial (804) 597-4129 to report an interruption during the broadcast.
- FOIA Council *Electronic Meetings Public Comment* form for submitting feedback on this electronic meeting may be accessed at <http://foiacouncil.dls.virginia.gov/sample%20letters/welcome.htm>.

JOIN THE INTERACTIVE MEETING (NOTE: WebEx is a video and audio platform and best accessed by connecting with a mobile device which has a built-in microphone and camera. Laptops and desktop computers will work provided an external microphone and camera are available. However, audio and video quality may vary depending on internet speed and use of a web browser other than Internet Explorer is required.)

Click or copy the link below:

JOIN THE INTERACTIVE MEETING

To access this meeting click on the link below:

<https://virginia-dhp.my.webex.com/virginia-dhp.my/j.php?MTID=m076b86fe799eee58c9a0fe1b413674c3>

For Audio Only:

Dial: 1-408-418-9388

When prompted enter access code: 132 296 1926

MISSION STATEMENT

Our mission is to ensure safe and competent patient care by licensing health professionals, enforcing standards of practice, and providing information to health care practitioners and the public.

**VIRGINIA BOARD OF VETERINARY MEDICINE
INSPECTIONS AD HOC COMMITTEE
MEETING MINUTES
FEBRUARY 20, 2020**

TIME AND PLACE: The Board of Veterinary Medicine's (Board) Ad Hoc Inspections Committee (Committee) meeting was called to order at 1:06 p.m., at the Department of Health Professions (DHP), Perimeter Center, 9960 Mayland Drive, 2nd Floor, Board Room 1, Henrico, Virginia 23233.

PRESIDING OFFICER: Tregel Cockburn, DVM, Committee Chair

COMMITTEE MEMBERS: Jason Bollenbeck, DVM, Virginia Medical Association of Virginia (VVMA)
Bayard Rucker, DVM, Board Member
Taryn Singleton, LVT, Practice Owner
Leith Ellis, DHP Senior Inspection

OTHER MEMBERS PRESENT: No others members present

STAFF PRESENT: Leslie L. Knachel, Executive Director
Anthony C. Morales, Licensing/Operations Manager
Kelli Moss, Board's Deputy Executive Director
Kelly Gottschalk, Veterinary Board Review Coordinator
Celia Wilson, Board's Operations Administrative Assistant

OTHERS PRESENT: Darren Petri, Food and Drug Administration, (FDA) Attended meeting via tele-conference
Sammy Johnson, Pharmacist, Deputy Executive Director, Virginia Board of Pharmacy
Beth O'Halloran, Deputy Executive Director, Virginia Board of Pharmacy
Michelle Schmitz, Director of DHP Enforcement

ORDERING OF AGENDA: Agenda was accepted as provided.

PUBLIC COMMENT: There was no public comment.

INTRODUCTIONS: Dr. Cockburn asked Committee and Board Staff to introduce themselves.

DISCUSSION ITEMS: **Presentation on Veterinary Drug Distribution – Darren Petri**
Mr. Petri provided a PowerPoint presentation via teleconference on a case involving the distribution of misbranded drugs into interstate commerce.

Develop Timeline for Committee Review of Veterinary Establishment Regulations and Guidance Documents
Ms. Knachel stated that the intent of the meeting today was to develop a timeline for the review of the regulations and guidance documents related to veterinary establishments. She suggested that the Committee consider reviewing the regulations and guidance documents in small portions. She indicated that the majority of violations involve maintaining controlled substances in accordance with applicable laws and regulations.

Mr. Ellis gave a brief synopsis of the inspection process for committee members.

The Committee decided to begin work on *18VAC150-20-190. Requirements for drug storage, dispensing, destruction, and records for all establishments* and Guidance Documents 150-16 and 150-23. Dr. Cockburn requested that Ms. Knachel provide the Committee with electronic versions of the regulations, guidance documents and inspection form to aid in providing feedback on suggested changes. The suggested changes are to be returned to Ms. Knachel prior to the next meeting.

NEW BUSINESS: No new business was presented.

NEXT MEETING: Dr. Cockburn requested that Ms. Knachel poll the Committee to determine a meeting date prior to the July full board meeting.

ADJOURNMENT: With all business concluded, the meeting adjourned at 4:03 p.m.

Tregel Cockburn, DVM
Chair

Leslie L. Knachel, M.P.H
Executive Director

Date

Date

VIRGINIA BOARD OF VETERINARY MEDICINE

Protocol to follow upon discovery of a loss or theft of drugs

Guidance:

Whenever a theft or any other unusual loss of any controlled substance is discovered, the Veterinarian-in-Charge, or in his absence his designee, shall immediately report such theft or loss to all of the following:

1. Virginia Board of Veterinary Medicine in writing;
2. Virginia Board of Pharmacy in writing; and
3. U.S. Drug Enforcement Agency

The Boards of Veterinary Medicine and Pharmacy request written notification be sent via email, FAX or postal carrier. The Board recommends contacting local law enforcement. Reports to the DEA must be made in accordance with 21 C.F.R. § 1301.76(b).

If the Veterinarian-in-Charge is unable to determine the exact kind and quantity of the drug loss, he shall immediately make a complete inventory of all Schedules II through V drugs.

Reference

18VAC150-20-190. Requirements for drug storage, dispensing, destruction, and records for all establishments.

5. Whenever a theft or any unusual loss of Schedules II through V drugs is discovered, the veterinarian-in-charge, or in his absence, his designee, shall immediately report such theft or loss to the Board of Veterinary Medicine and the Board of Pharmacy and to the DEA. The report to the boards shall be in writing and sent electronically or by regular mail. The report to the DEA shall be in accordance with 21 CFR 1301.76(b). If the veterinarian-in-charge is unable to determine the exact kind and quantity of the drug loss, he shall immediately take a complete inventory of all Schedules II through V drugs.

VIRGINIA BOARD OF VETERINARY MEDICINE

Disposal of Deceased Animals

A veterinary establishment is required to have an acceptable method for disposal of deceased animals. Refrigeration exclusively for carcasses of companion animals that require storage for 24 hours or more is required. Disposal of a deceased animal must also be compliant with all local ordinances.

When a deceased animal is to be returned to its owner, the veterinarian or his/her designee should discuss with the owner preferences for the return of the animal to include type of container and/or wrapping.

In addition, the U.S. Fish and Wildlife Service's [Secondary Pentobarbital Poisoning of Wildlife](#) fact sheet provides information on which animals are affected, how to prevent accidental poisoning, and penalties for noncompliance. Questions on secondary poisoning of wildlife should be directed to the U.S. Fish and Wildlife Service, Office of Law Enforcement Resident Agent in Charge, at the Richmond District Office at 804-771-2883.

References

Regulations

18VAC150-20-200. Standards for veterinary establishments.

A. Stationary establishments. A stationary establishment shall provide surgery and encompass all aspects of health care for small or large animals, or both. All stationary establishments shall meet the requirements set forth in this subsection:

- 1. Buildings and grounds must be maintained to provide sanitary facilities for the care and medical well-being of patients.*
 - a. Temperature, ventilation, and lighting must be consistent with the medical well-being of the patients.*
 - b. There shall be on-premises:
 - (1) Hot and cold running water of drinking quality, as defined by the Virginia Department of Health;*
 - (2) An acceptable method of disposal of deceased animals, in accordance with any local ordinance or state and federal regulations; and*
 - (3) Refrigeration exclusively for carcasses of companion animals that require storage for 24 hours or more.**

Other

Please review the Department of Environmental Quality's guidance documents at www.deq.virginia.gov related to the following:

- [Waste Guidance Memo No. 03-2009: On-Site Burial of Routine Animal Mortality](#)
- [Waste Guidance Memo No. 02-2009: On-Site Composting of Routine Animal Mortality](#)

Commonwealth of Virginia



VIRGINIA BOARD OF VETERINARY MEDICINE
REGULATIONS
GOVERNING THE PRACTICE OF VETERINARY
MEDICINE

Title of Regulations: 18 VAC 150-20-10 et seq.

**Statutory Authority: § 54.1-2400 and Chapter 38
of Title 54.1 of the *Code of Virginia***

Effective Date: March 5, 2020

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Henrico, VA 23233-1463

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www.dhp.virginia.gov

vetbd@dhp.virginia.gov (email)

18VAC150-20-30. Posting of licenses; accuracy of address.

A. All licenses and registrations issued by the board or printout from the board's recognized online verification system shall be posted in a place conspicuous to the public at the establishment where veterinary services are being provided or available for inspection at the location where an equine dental technician is working. Licensees who do relief or temporary work in an establishment shall carry a license or verification with them or post it at the establishment. Ambulatory veterinary practices that do not have an office accessible to the public shall carry their licenses and registrations or verifications in their vehicles.

Commented [KL(1)]: Would need to define "Online Verification System"

B. It shall be the duty and responsibility of each licensee, registrant, and holder of a registration to operate a veterinary establishment to keep the board apprised at all times of his current address of record and the public address, if different from the address of record. All notices required by law or by this chapter to be mailed to any veterinarian, veterinary technician, registered equine dental technician, or holder of a registration to operate a veterinary establishment shall be validly given when mailed to the address of record furnished to the board pursuant to this regulation. All address changes shall be furnished to the board within 30 days of such change.

Part IV. Standards of Practice.

~~18VAC150-20-171. Specialty practice in a limited setting.~~

~~A licensed veterinarian may conduct drug testing at animal shows and events or examine any animal and express a professional judgment as to its health at (i) genetic screening clinics where animals are examined for cardiac, ophthalmic and auditory diseases, (ii) agricultural fairs, (iii) 4 H or other youth organization competitions, (iv) livestock auctions, (v) horse races, (vi) hunt club events, (vii) pet adoption events, or (viii) animal shows including, but not limited to dog, cat, and horse shows.~~

Commented [KL(2)]: This section is moved to 18VAC150-20-180

Part V. Veterinary Establishments.

18VAC150-20-180. Requirements to be registered as a veterinary establishment.

A. Every veterinary establishment shall apply for registration on a form provided by the board and submit the application fee specified in 18VAC150-20-100. The board may issue a registration as a stationary or ambulatory establishment. Every veterinary establishment shall have a veterinarian-in-charge registered with the board in order to operate.

1. Veterinary medicine may only be practiced out of a registered establishment except in emergency situations or in limited specialized practices as provided in subdivision 4 of this subsection. The injection of a microchip for identification purposes shall only be performed in a veterinary establishment, except personnel of public or private animal shelters may inject animals while in their possession.

2. An application for registration must be made to the board 45 days in advance of opening or changing the location of the establishment or requesting a change in the establishment category listed on the registration.
3. Any addition or renovation of a stationary establishment or an ambulatory establishment that involves changes to the structure or composition of a surgery room shall require reinspection by the board and payment of the required fee prior to use.

4. A licensed veterinarian may conduct drug testing at animal shows and events or examine any animal and express a professional judgment as to its health at (i) genetic screening clinics where animals are examined for cardiac, ophthalmic and auditory diseases, (ii) agricultural fairs, (iii) 4-H or other youth organization competitions, (iv) livestock auctions, (v) horse races, (vi) hunt club events, (vii) pet adoption events, or (viii) animal shows including, but not limited to dog, cat, and horse shows.

Commented [KL(3)]: Moved from 18VAC150-20-171

B. A veterinary establishment will be registered by the board when:

1. It is inspected by the board and is found to meet the standards set forth by 18VAC150-20-190 and 18VAC150-20-200 or 18VAC150-20-201 where applicable. If, during a new or routine inspection, violations or deficiencies are found necessitating a reinspection, the prescribed reinspection fee will be levied. Failure to pay the fee shall be deemed unprofessional conduct and, until paid, the establishment shall be deemed to be unregistered.
2. A veterinarian currently licensed by and in good standing with the board is registered with the board in writing as veterinarian-in-charge and ensures that the establishment registration fee has been paid.

18VAC150-20-181. Requirements for veterinarian-in-charge.

A. The veterinarian-in-charge of a veterinary establishment is responsible for:

1. Regularly being on site as necessary to provide routine oversight to the veterinary establishment for patient safety and compliance with law and regulation.
2. Maintaining the ~~facility-establishment~~ within the standards set forth by this chapter.
3. Performing the biennial controlled substance inventory that meets the requirements in § 54.1-3404 and ensuring compliance at the ~~facility-establishment~~ with any federal or state law relating to controlled substances as defined in ~~§ 54.1-3404~~, § 54.1-3401 of the Code of Virginia. The performance of the biennial inventory may be delegated to another licensee, provided the veterinarian-in-charge signs the inventory and remains responsible for its content and accuracy.
4. Notifying the board in writing of the closure of the registered ~~facility-establishment~~ 10 days prior to closure.
5. Notifying the board immediately if no longer acting as the veterinarian-in-charge.
6. Ensuring the establishment maintains a current and valid registration issued by the board.

B. Upon any change in veterinarian-in-charge, these procedures shall be followed:

1. The veterinarian-in-charge registered with the board remains responsible for the establishment and the stock of controlled substances until a new veterinarian-in-charge is registered or for five days, whichever occurs sooner.

2. An application for a new registration, naming the new veterinarian-in-charge, shall be made five days prior to the change of the veterinarian-in-charge. If no prior notice was given by the previous veterinarian-in-charge, an application for a new registration naming a new veterinarian-in-charge shall be filed as soon as possible, but no more than 10 days, after the change.

3. The previous establishment registration is void on the date of the change of veterinarian-in-charge and shall be returned by the former veterinarian-in-charge to the board five days following the date of change.

4. Prior to the opening of the business, on the date of the change of veterinarian-in-charge, the new veterinarian-in-charge shall take a complete inventory of all Schedules II through V drugs on hand. He shall date and sign the inventory and maintain it on premises for three years. That inventory may be designated as the official biennial controlled substance inventory.

5. All Schedule II – V controlled substance must be properly transferred from the stocking DEA registrant to the incoming DEA registrant.

a. Completion of DEA Form 22 is required for the transfer of Schedule II controlled substances and kept in in chronological order for transfer.

b. Documentation by way of invoice creation for Schedule III-V Controlled substances.

C. Prior to the sale or closure of a veterinary establishment, the veterinarian-in-charge shall:

1. Follow the requirements for transfer of patient records to another location in accordance with § 54.1-2405 of the Code of Virginia; and

2. If there is no transfer of records upon sale or closure of an establishment, the veterinarian-in-charge shall provide to the board information about the location of or access to patient records and the disposition of all scheduled drugs.

Commented [KL(4)]: This is a concept. Wording will need to be addressed.

Commented [KL(5)]: Does destruction of records need to be addressed. Vet med excluded from § 32.1-127.1:03
"Health care provider" means those entities listed in the definition of "health care provider" in § 8.01-581.1, except that state-operated facilities shall also be considered health care providers for the purposes of this section. Health care provider shall also include all persons who are licensed, certified, registered or permitted or who hold a multistate licensure privilege issued by any of the health regulatory boards within the Department of Health Professions, except persons regulated by the Board of Funeral Directors and Embalmers or the Board of Veterinary Medicine.

18VAC150-20-190. Requirements for drug storage, dispensing, destruction, and records for all establishments.

A. All drugs shall be maintained, administered, dispensed, prescribed and destroyed in compliance with state and federal laws, which include § 54.1-3303 of the Code of Virginia, the Drug Control Act (§ 54.1-3400 et seq. of the Code of Virginia), applicable parts of the federal Food, Drug, and Cosmetic Control Act (21 USC § 301 et seq.), the Prescription Drug Marketing Act (21 USC § 301 et seq.), and the Controlled Substances Act (21 USC § 801 et seq.), as well as applicable portions of Title 21 of the Code of Federal Regulations.

Commented [KL(6)]: Define drug which may include OTC and others § 54.1-3401
"Drug" means (i) articles or substances recognized in the official United States Pharmacopoeia National Formulary or official Homeopathic Pharmacopoeia of the United States, or any supplement to any of them; (ii) articles or substances intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in man or animals; (iii) articles or substances, other than food, intended to affect the structure or any function of the body of man or animals; (iv) articles or substances intended for use as a component of any article specified in clause (i), (ii), or (iii); or (v) a biological product. "Drug" does not include devices or their components, parts, or accessories.

B. All repackaged tablets and capsules dispensed for companion animals shall be in approved safety closure containers, except safety caps shall not be required when any person who requests that the medication not have a safety cap, or in such cases in which the medication is of such form or size that it cannot be reasonably dispensed in such containers (e.g., topical medications, ophthalmic, or otic). An owner request for nonsafety packaging shall be documented in the patient record.

C. All drugs dispensed for companion animals shall be labeled with the following:

1. Name and address of the facility establishment;

2. First and last name of owner;

3. Animal identification and species;
4. Date dispensed;
5. Directions for use;
6. Name, strength (if more than one dosage form exists), and quantity of the drug; and
7. Name of the prescribing veterinarian.

D. All veterinary establishments shall maintain drugs in a secure manner with precaution taken to prevent theft or diversion. Only the veterinarian, veterinary technician, pharmacist, or pharmacy technician shall have access to Schedules II through V drugs, with the exception provided in subdivision 6 of this subsection.

1. In a stationary establishment, the general stock of Schedules II through V drugs shall be stored in a securely locked cabinet or safe that is not easily movable.
2. The establishment may also have a working stock of Schedules II through V drugs that shall be kept in (i) a securely locked container, cabinet, or safe when not in use or (ii) direct possession of a veterinarian or veterinary technician. A working stock shall consist of only those drugs that are necessary for use during a normal business day or 24 hours, whichever is less.
3. Whenever the establishment is closed, all general and working stock of Schedules II through V drugs and any dispensed prescriptions that were not delivered during normal business hours shall be securely stored as required for the general stock.
4. Prescriptions that have been dispensed and prepared for delivery shall be maintained under lock or in an area that is not readily accessible to the public and may be delivered to an owner by an unlicensed person, as designated by the veterinarian.
5. Whenever a theft or any unusual loss of Schedules II through V drugs is discovered, the veterinarian-in-charge, or in his absence, his designee, shall immediately report such theft or loss to the Board of Veterinary Medicine and the Board of Pharmacy and to the DEA. The report to the boards shall be in writing and sent electronically or by regular mail. The report to the DEA shall be in accordance with 21 CFR 1301.76(b). If the veterinarian-in-charge is unable to determine the exact kind and quantity of the drug loss, he shall immediately take a complete inventory of all Schedules II through V drugs.
6. Access to drugs by unlicensed persons shall be allowed only under the following conditions:
 - a. An animal is being kept at the establishment outside of the normal hours of operation, and a licensed practitioner is not present in the ~~facility~~ establishment;
 - b. The drugs are limited to those dispensed to a specific patient; and

c. The drugs are maintained separately from the establishment's general drug stock and kept in such a manner so they are not readily available to the public.

E. Schedules II through V drugs shall be destroyed by (i) transferring the drugs to another entity authorized to possess or provide for proper disposal of such drugs or (ii) destroying the drugs in compliance with applicable local, state, and federal laws and regulations. If Schedules II through V drugs are to be destroyed, a DEA drug destruction form shall be fully completed and used as the record of all drugs to be destroyed. A copy of the destruction form shall be retained at the veterinarian practice site with other inventory records.

F. The drug storage area shall have appropriate provision for temperature control for all drugs and biologics. If drugs requiring refrigeration are maintained at the ~~facility~~ establishment, the drugs shall be kept in a refrigerator with the interior thermometer maintained between 36°F and 46°F. If a refrigerated drug is in Schedules II through V, the drug shall be kept in a locked container secured to the refrigerator, or the refrigerator shall be locked. Drugs stored at room temperature shall be maintained between 59°F and 86°F.

G. The stock of drugs shall be reviewed frequently, and expired drugs shall be removed from the working stock of drugs at the expiration date and shall not be administered or dispensed.

H. A distribution record shall be maintained in addition to the patient's record, in chronological order, for the administration and dispensing of all Schedules II through V drugs. This record is to be maintained for a period of three years from the date of transaction. This distribution record shall include the following:

1. Date of transaction;
2. Drug name, strength, and the amount dispensed, administered, and wasted;
3. Owner and animal identification; and
4. Identification of the veterinarian authorizing the administration or dispensing of the drug.

I. Original invoices for all Schedules II through V drugs received shall be maintained in chronological order on the premises where the stock of drugs is held, and the actual date of receipt shall be noted. All drug records shall be maintained for a period of three years from the date of transaction.

J. A complete and accurate inventory of all Schedules II through V drugs shall be taken, dated, and signed on any date that is within two years of the previous biennial inventory. Drug strength must be specified. This inventory shall indicate if it was made at the opening or closing of business and shall be maintained on the premises where the drugs are held for three years from the date of taking the inventory.

K. Inventories and records, including original invoices, of Schedule II drugs shall be maintained separately from all other records, and the establishment shall maintain a continuous inventory of all Schedule II drugs received, administered, or dispensed, with reconciliation at least monthly. Reconciliation requires an explanation noted on the inventory for any difference between the actual

physical count and the theoretical count indicated by the distribution record. A continuous inventory shall accurately indicate the physical count of each Schedule II drug in the general and working stocks at the time of performing the inventory.

L. Veterinary establishments shall (i) maintain records of the dispensing of feline buprenorphine and canine butorphanol, (ii) reconcile such records monthly, and (iii) make such records available for inspection upon request.

M. Veterinary establishments in which bulk reconstitution of injectable, bulk compounding, or the repackaging or prepackaging of drugs is performed shall maintain adequate control records for a period of one year or until the expiration, whichever is greater. The records shall show the name of the drugs used; strength, if any; date reconstituted, repackaged or prepacked; quantity prepared; initials of the veterinarian verifying the process; the assigned lot or control number; the manufacturer's or distributor's name and lot or control number; and an expiration date determined by the veterinarian in accordance with USP guidelines.

N. If a limited stationary or ambulatory practice uses the facilities of another veterinary establishment, the drug distribution log shall clearly reveal whose Schedules II through V drugs were used. If the establishment's drug stock is used, the distribution record shall show that the procedure was performed by a visiting veterinarian who has the patient record. If the visiting veterinarian uses his own stock of drugs, he shall make entries in his own distribution record and in the patient record and shall leave a copy of the patient record at the other establishment.

18VAC150-20-200. Standards for stationary veterinary establishments.

A. Stationary establishments. A stationary establishment shall provide surgery and encompass all aspects of health care for small or large animals, or both. All stationary establishments shall meet the requirements set forth in this subsection:

2. Areas within building. The areas within the facility-establishment shall include the following: