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Proposed Regulation
Agency Background Document

Agency name	Board of Veterinary Medicine, Department of Health Professions
Virginia Administrative Code (VAC) Chapter citation(s)	18VAC150-20
VAC Chapter title(s)	Regulations Governing the Practice of Veterinary Medicine
Action title	Regulation of haul-in facilities
Date this document prepared	October 27, 2026

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Order 17 (2026) (EO 17), any instructions or procedures issued by the Department of Planning and Budget (DPB) pursuant to EO 17, the *Regulations for Filing and Publishing Agency Regulations* (1 VAC 7-10), and the *Form, Style, and Procedure Manual for Publication of Virginia Regulations.*

Brief Summary

Provide a brief summary (preferably no more than 2 or 3 paragraphs) of this regulatory change (i.e., new regulation, amendments to an existing regulation, or repeal of an existing regulation). Alert the reader to all substantive matters. If applicable, generally describe the existing regulation.

Following a recommendation from the 2025 report of the Large Animal Veterinarian Shortage Study Workgroup, the Board is amending regulations to incorporate the ability of veterinarians to use haul-in facilities. The regulation of haul-in facilities will allow owners to bring animals to veterinarians to be treated in an inspected facility. There is currently no provision which allows this.

Acronyms and Definitions

Define all acronyms and technical terms used in this form that are not defined in the "Definitions" section of the regulation.

N/A

Mandate and Impetus

Identify the mandate for this regulatory change and any other impetus that specifically prompted its initiation (e.g., new or modified mandate, petition for rulemaking, periodic review, or board decision). For purposes of executive branch review, "mandate" has the same meaning as defined in EO 17, "a directive from the General Assembly, the federal government, or a court that requires that a regulation be promulgated, amended, or repealed in whole or part." For changes in response to federal mandates, indicate the extent of discretion related to the proposed regulatory changes, the rationale for the changes, and briefly indicate how the federal mandate aligns with the best interest of public welfare.

The impetus for this action is the 2025 report of the Large Animal Veterinarian Shortage Study Workgroup.

Legal Basis

Identify (1) the promulgating agency, and (2) the state and/or federal legal authority for the regulatory change, including the most relevant citations to the Code of Virginia and Acts of Assembly chapter number(s), if applicable. Your citation must include a specific provision, if any, authorizing the promulgating agency to regulate this specific subject or program, as well as a reference to the agency's overall regulatory authority.

Regulations of the Board of Veterinary Medicine are promulgated under the general authority of Chapter 24 of Title 54.1 of the Code of Virginia. Virginia Code § 54.1-2400(6) specifically states that the general powers and duties of health regulatory boards shall be "[t]o promulgate regulations in accordance with the Administrative Process Act (§ 2.2-4000 et seq.) that are reasonable and necessary to administer effectively the regulatory system."

Purpose

Explain the need for the regulatory change, including a description of: (1) the rationale or justification, (2) the specific reasons the regulatory change is essential to protect the health, safety or welfare of citizens, and (3) the goals of the regulatory change and the problems it is intended to solve.

The rationale for this action is to permit a more useful and advantageous treatment of large animals that is not the existing location of the animal, such as an unsterile field or barn. This regulatory change is essential to protect the health, safety, and welfare of citizens because veterinary services, if provided in a facility, must be in a facility regulated by the Board of Veterinary Medicine. The goals of this regulatory change are to create additional practice facilities and the problems the change is intended to solve are lack of ability for veterinarians to practice in haul-in facilities currently.

Substance

Briefly identify and explain the new substantive provisions, the substantive changes to existing sections, or both. A more detailed discussion is provided in the "Detail of Changes" section below.

The changes create a definition of haul-in facilities and specify various places in existing regulations where haul-in facilities will either be included in the regulatory requirements or excluded from existing requirements. The changes additionally create a new section specifically addressing requirements for haul-in facilities.

Issues

Identify the issues associated with the regulatory change, including: 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions; 2) the primary advantages and disadvantages to the agency or the Commonwealth; and 3) other pertinent matters of interest to the regulated community, government officials, and the public. If there are no disadvantages to the public or the Commonwealth, include a specific statement to that effect.

1) The primary advantages to the public are greater options for treatment of large animals by veterinarians. There are no disadvantages to the public.
2) There are no primary advantages or disadvantages to the agency or the Commonwealth.
3) The Director of the Department of Health Professions has reviewed the proposal and performed a competitive impact analysis. Any restraint on competition as a result of promulgating these regulations is a foreseeable, inherent, and ordinary result of the statutory obligation of the Board to protect the safety and health of citizens of the Commonwealth. The Board is authorized under § 54.1-2400 "[t]o promulgate regulations in accordance with the Administrative Process Act (§ 2.2-4000 et seq.) which are reasonable and necessary to administer effectively the regulatory system . . . Such regulations shall not conflict with the purposes and intent of this chapter or of Chapter 1 (§ 54.1-100 et seq.) and Chapter 25 (§ 54.1-2500 et seq.) of this title." The promulgated regulations do not conflict with the purpose or intent of Chapters 1 or 25 of Title 54.1.

Requirements More Restrictive than Federal

Identify and describe any requirement of the regulatory change which is more restrictive than applicable federal requirements. Include a specific citation for each applicable federal requirement, and a rationale for the need for the more restrictive requirements. If there are no applicable federal requirements, or no requirements that exceed applicable federal requirements, include a specific statement to that effect.

There are no applicable federal requirements.

Identification of Affected Parties

Use the tables below to indicate all Individuals and Entities affected by this regulatory change, either directly or indirectly. The effect could be positive (benefit) or negative (cost). Complete each row:

- *If available information indicates that a party is not affected, report "**none**" in the appropriate row.*
- *If no information exists, report "**unknown**" in the appropriate row.*

For Table 3: Per § 2.2-4007.04, "particularly affected" means any party that bears an "identified disproportionate material impact" that would not be experienced by similar parties. For example, this could be an affected entity that is likely to have a substantially different impact than other affected entities.

Table 1: Directly Affected Parties	
Affected Parties	*Number and Description (Type or Name)*
Individuals	Large animal veterinarians. A license to practice veterinary medicine is a general license, and therefore the agency has no precise number of large animal veterinarians. In 2025, a report of DHP's Health Workforce Data Center surveyed veterinarians and, at that time, 548 licensed veterinarians in the state identified as large animal veterinarians. Licensed veterinary technicians. A license to practice as a veterinary technician is a general license, and therefore the agency has no precise number of licensed veterinary technicians who work with large animals. In 2025, a report of DHP's Health Workforce Data Center surveyed licensed veterinary technicians and, at that time, 165 LVTs reported working with large animals. Farmers and other owners of large animals. The agency has no estimate for this number.
Other State Agencies	None
Entities:	
• Localities	None
• Small Businesses	None
• Other Businesses	None
• Other Entities	None

Table 2: Indirectly Affected Parties	
Affected Parties	*Number and Description (Type or Name)*
Individuals	None
Other State Agencies	None
Entities:	
• Localities	None
• Small Businesses	None
• Other Businesses	None
• Other Entities	None

Table 3: Particularly Affected Parties
Are any of the parties listed in Tables 1 or 2 "particularly affected" (**Yes, No, or Unknown**). If yes, describe all affected parties and why they are particularly affected: No

Benefits and Costs

For Tables 4 and 5, complete each row:

- *If available information indicates that no benefits or costs are anticipated for a party, report "**none**" in the appropriate row.*
- *If no information exists, report "**unknown**" in the appropriate row.*

Benefits Resulting from Changes

Consistent with § 2.2-4007.04 of the Code of Virginia, use Table 4 to describe all regulatory changes that are anticipated to have benefits. Include benefits that apply to directly and indirectly affected parties, as reported in Tables 1 and 2.

When describing a particular benefit, specify which new or changed requirement creates the benefit. Keep in mind that this is a benefit from the proposed change versus the status quo. Exclude changes that merely improve clarity, formatting, or terminology.

Table 4: Benefits Resulting from Changes	
Affected Parties	*Description of Regulatory Change(s) and Resulting Additional Benefit(s)*
Individuals	Unknown. Although costs are associated with the registration of a haul-in facility, such as initial registration and renewal, the cost may be shared between multiple veterinarians using the same facility and may be very minimal. The cost was already significantly lower than other establishment fees, which was deliberate.
Other State Agencies	None
Entities:	
• Localities	None
• Small Businesses	None
• Other Businesses	None
• Other Entities	None

Costs Resulting from Changes

Consistent with § 2.2-4007.04 of the Code of Virginia, use Table 5 to describe all regulatory changes that are anticipated to have costs. Include costs that apply to directly and indirectly affected parties, as reported in Tables 1 and 2.

When describing a particular cost, specify which new or changed requirement creates the cost. Keep in mind that this is a cost from the proposed change versus the status quo. Exclude changes that merely improve clarity, formatting, or terminology.

Table 5: Costs Resulting from Changes	
Affected Parties	*Description of Regulatory Change(s) and Resulting Additional Costs(s)*
Individuals	Initial registration: $100 Renewal: $50 Late renewal fee: $25 Reinstatement: $50 Reinspection: $100
Other State Agencies	None
Entities:	
• Localities	None
• Small Businesses	None
• Other Businesses	None
• Other Entities	None

Impact on Your Agency

In Table 6, indicate the overall benefits and costs to your agency resulting from this regulatory action, compared to the status quo. Complete each row.

Table 6: Benefits and Costs for Your Agency
Projected benefits
Are changes expected in any savings or revenues (either one-time or on-going)? (**Yes, No, or Unknown**). If yes, provide a brief explanation: No. Although costs are associated with the registration, that cost will be used to fund the regulation of the facilities and will not result in a benefit.
Are changes expected in other (non-monetary) benefits? (**Yes, No, or Unknown**). If yes, describe any other (non-monetary) benefits: No.
Projected costs
Are changes expected in any expenditures (either one-time or on-going)? (**Yes, No, or Unknown**). If yes, provide a brief explanation: No.
Can any costs or revenue loss be absorbed by existing resources? (**Yes, No, or Unknown**). No. This requires fees to be assessed.

Other Impacts per § 2.2-4007.04

In Table 7, report the specific benefits and costs expected to result from this regulatory change compared to the status quo. Complete each row.

Table 7: Other Impacts Addressed by § 2.2-4007.04
Are changes in the use and value of private property expected? (**Yes, No, or Unknown**). If yes, describe: the impact, any entities likely to be affected, and the change(s) causing the impact: No.
Are changes in the development of real estate for commercial or residential purposes expected? (**Yes, No, or Unknown**). If yes, describe: the impact, any entities likely to be affected, and the change(s) causing the impact: No.
Are changes in employment expected? (**Yes, No, or Unknown**). If yes, describe the expected change in the number of persons and the types of employment positions affected: No.
For changes affecting Localities only: for any affected Locality, are there sources of potential funds to comply with the changes? (**Yes, No, or Unknown**). If yes, describe the sources of potential funds: No.
For changes affecting Small Businesses only: for any affected Small Business, are there projected reporting, recordkeeping, and other administrative costs, including any necessary professional skills to prepare documents? (**Yes, No, or Unknown**). If yes, describe these costs and skills: No.

Alternatives to Regulation

Consistent with EO 17, and §§ 2.2-4007.04 and 2.2-4007.1 B of the Code of Virginia, for any regulatory change describe any viable alternatives to the regulatory change that were considered, and the rationale used by the agency to select the least burdensome, less costly, and least intrusive alternative.

There are no alternatives to regulation. The intent is to regulate a new type of facility. That requires a regulatory action. The Large Animal Workgroup determined that a regulatory change should be initiated. Other non-regulatory ideas were discussed and can be viewed here. There are no less intrusive or less costly alternative methods. Regulating a new type of facility requires regulation. The agency must assess fees required for operation. The Board voted to adopt lower fees than standard establishments to reduce the cost associated with haul-in facilities.

Regulatory Flexibility Analysis

Consistent with § 2.2-4007.1 B of the Code of Virginia, describe the agency's analysis of alternative regulatory methods, consistent with health, safety, environmental, and economic welfare, that will accomplish the objectives of applicable law while minimizing the adverse impact on small business. Alternative regulatory methods include, at a minimum: 1) establishing less stringent compliance or reporting requirements; 2) establishing less stringent schedules or deadlines for compliance or reporting requirements; 3) consolidation or simplification of compliance or reporting requirements; 4) establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation; and 5) the exemption of small businesses from all or any part of the requirements contained in the regulatory change.

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(1) The Board deliberately kept requirements for haul-in facilities simple. It must, however, adopt standards to protect the health and safety of the public. (2) No schedules or compliance requirements exist. (3) No schedules or compliance requirements exist. (4) No design or operational standards exist. (5) The Board cannot exempt small businesses from public safety requirements without severe detriment to the public.

Public Comment

For all comments submitted, including those received on the Town Hall, in a public hearing, or directly to the agency:

1) *Summarize all comments received during the public comment period following publication of the previous stage, and provide the agency's response.*
2) *If no comments were received, enter "**none**."*

Table 8: Public Comment

Commenter	Comment	Agency response
28 commenters via Town Hall, many anonymous	These comments generally misunderstood the existing allowances to practice veterinary medicine in the Commonwealth and the subject of the regulations. The comments focused on allowing described existing haul-in facilities	The practice of veterinary medicine in the Commonwealth must be performed in a registered establishment. Many registered establishments, however, currently use haul-in models on registered premises. As stated in the draft regulations, registered haul-in facilities do not include facilities on the

	to continue operating and pointing out practice locations which are not currently regulated, such as fields and where the large animal is.	premises of an existing veterinary establishment. This definition and purpose was developed with the regulatory advisory panel, which included stakeholders from the farm and large animal veterinarian community.
One commenter via Town Hall	The comment requested that the regulations be kept simple to account for the practice model of a haul-in.	The Board has attempted to keep regulations for these facilities as streamlined as possible with minimal specific requirements. This was to account for the practice model as noted by the commenter.
Three commenters via Town Hall	The comments appeared to believe this would alter field practice of large animal veterinarians.	The Board does not intend to alter the practice of treating animals in the field by large animal veterinarians. The allowance for use of haul-in facilities, instead, is intended to offer a more controlled treatment environment that may be more centrally located for the veterinarian.
Four commenters via Town Hall	The comments supported the registration of haul-in facilities and the model of multiple veterinarians using one facility.	The Board appreciates the support.
Four commenters via Town Hall	No substantive comments on the notice of intended regulatory action were provided. The comments instead generally opposed new regulations.	The Board is required to regulate the practice of veterinary medicine in the Commonwealth to protect the health, safety, and welfare of the public. The Board is also aware that the haul-in practice model is needed as an option to treat large animals. The only way this can occur is through regulation.
One anonymous comment via Town Hall	No position was stated except derision for the Board or the regulatory process, the subject was unclear.	The Board would welcome substantive comments on the proposed regulatory draft, but has no response to this comment.
One comment via Town Hall	Large animal veterinarians must be supported and services must remain in place.	The Board thanks you for your comment and agrees. The Board's intention is to allow existing services to continue as they are and to provide a new model for services with minimal fees and regulatory requirements while protecting the public.
One comment via Town Hall	The comment provided only an AI summary of comments provided on Town Hall.	The Board has no response to an AI summary of comments.
The Virginia Cattleman's Association and the Virginia State Dairymen's Association via Town Hall	Both organizations expressed an interest in seeing proposed regulations before providing substantive comments.	The Board appreciates the comments. Regulatory boards of DHP do not provide proposed regulatory text until the proposed stage of a regulatory action. The Board will look forward to the associations' comments on the proposed regulatory text posted with this current stage.

Public Participation

Indicate how the public should contact the agency to submit comments on this regulation, and whether a public hearing will be held by completing the text below.

The Board of Veterinary Medicine is providing an opportunity for comments on this regulatory proposal, including but not limited to (i) the costs and benefits of the regulatory proposal, (ii) any alternative approaches, (iii) the potential impacts of the regulation, and (iv) the agency's regulatory flexibility analysis stated in that section of the background document.

Anyone wishing to submit written comments for the public comment file may do so through the Public Comment Forums feature of the Virginia Regulatory Town Hall web site at https://www.townhall.virginia.gov. Written comments must include the name and address of the commenter. Comments may also be submitted by mail, email or fax to Matt Novak, Agency Regulatory Coordinator, 9960 Mayland Drive, Henrico, VA 23233 or matthew.novak@dhp.virginia.gov or by fax to (804) 915-0382. In order to be considered, comments must be received by 11:59 pm on the last day of the public comment period.

Detail of Changes

List all regulatory changes and the consequences of the changes. For any applicable table:

1) *Enter the current Chapter and Section number. If the existing VAC Chapter(s) or sections are being repealed and replaced, include both the current and the new number for each current and replacement section.*
2) *Provide a summary explanation of the current requirements and what they mean. **DO NOT** quote the text of the current regulation.*
3) *Provide a summary explanation of the new requirements and what they mean. For example, describe the intent of the language and the expected impact. Describe the difference between existing requirement(s) and/or agency practice(s) and what is being proposed in this regulatory change. **DO NOT** quote the text of the new regulation.*

*Use all tables that apply **but delete tables that are not used.***

Table 9: Amending or Repealing Existing VAC Chapter(s)
If an existing VAC Chapter(s) is being amended or repealed, use Table 9 to describe the changes between the existing VAC Chapter(s) and the proposed regulation.

Current (and New) Chapter - Section number	SUMMARIZE (do not quote) current requirements in the VAC	Change, intent, rationale, and likely impact of new requirements
20-10	Contains definitions used in the chapter.	The Board has defined the term "haul-in facility," which is used throughout the proposed changes and is the type of facility that will be regulated under these amendments. The definition expressly exempts facilities located on the premises of a registered stationary establishment.
20-100	Lists fees charged by the Board for various credentials and services.	Fees are added for registration of a haul-in facility, renewal of registration of a haul-in facility, late renewal, reinstatement, and reinspection. The fees range from 1/3 to 1/4 of the fees for an establishment registration. The Board, following the recommendations of a regulatory advisory panel

		which met twice, voted to impose lower fees due to the lower volume of work and limited capacity of a haul-in facility.
20-180	Contains requirements for and limitations on regulated veterinary facilities, including requirements for registration.	A reference to haul-in facilities has been added in each subsection where "veterinary establishment" is currently referenced. The defined term for veterinary establishment in 20-10 does not include haul-in facilities. To incorporate haul-in facilities to these requirements, the term must be added. Of note, the addition to subsection A requires that a veterinarian-in-charge (or VIC) be named on the application for a haul-in facility registration. Additionally, a reference to new section 202 is added to subsection B to incorporate the requirements for haul-in facilities.
20-190	Contains requirements for drug storage and usage in veterinary facilities.	Subsection D is amended to incorporate haul-in facilities into the requirement that drugs be maintained in a secure manner to deter theft and diversion. An additional amendment to Subsection D states that Schedule II – V drugs may not be stored at a haul-in facility.
20-200	Prescribes standards for stationary veterinary establishments.	Subsection A 3 is amended to clarify that the requirement to have proof of an in-house or contracted laboratory service to perform lab tests applies to stationary and ambulatory establishments only.
20-202	New section.	Section 202 is a new section adopted by the Board which solely addresses registered haul-in facilities. The requirements contained in this new section were recommended by a regulatory advisory panel which included members of the stakeholder community representing large animal veterinarians and farmers. Subsection A sets forth the physical requirements for haul-in facilities necessary to protect health, safety, and welfare of the public. Those requirements include: having space, equipment, and supplies appropriate to the species being treated in a safe and sanitary manner; provision of appropriate lighting, temperature, ventilation, water, and other essential utilities; appropriate methods for disposal of deceased animals; and an ability to separate animals to stop the spread of contagion. Subsection B requires that licensees providing treatment at a haul-in facility be associated with an existing stationary or ambulatory establishment registered in Virginia. This requirement ties practice at a haul-in facility to a stationary or ambulatory establishment. A veterinarian or licensed veterinary technician will not be able to solely practice out of a haul-in facility, which is intended to be a temporary location. Subsection C requires Schedule II – V drugs, drug records, and patient records be stored and maintained by the associated stationary or

		ambulatory establishment. Subsection C also states that only Schedule VI drugs and biologics may be stored at a haul-in facility. Any Schedule II – V drugs used at a haul-in facility must be removed from the premises with the practitioner. Subsection D requires the VIC maintain a record of all animals treated at the haul-in facility that includes the owner, patient ID, practitioner treating, and date of treatment if more than one veterinary establishment uses the haul-in facility. In the event only one veterinary establishment uses the haul-in facility, patient records will be stored at the single establishment using the facility and other establishments will not need to be identified on a centralized record.