

April 20, 2022
Training Room 1
1:00 p.m.

Agenda
Virginia Board of Veterinary Medicine
Inspection Committee Meeting

Call to Order – Tregel Cockburn, DVM, Chair

Page 1

- Welcome
- Emergency Egress Procedures
- 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.

Approval of Minutes – Dr. Cockburn

Pages 2-4

February 11, 2022 Inspection Committee Meeting

Discussion Items – Dr. Cockburn/Kelli Moss

Pages 5-47

- Review final draft guidance document for veterinarian-in-charge for recommendation to Board (**pp 5-12**)
- Review proposed regulation changes to medical recordkeeping (**pp 13-14**)
- Review Regulation 18 VAC 150-20-201(A) Standards for agricultural or equine ambulatory practice (Kelli/Dr. Gottschalk, **pp 15-17**)
 - 2014 Veterinary Medicine Mobility Act
 - Proposed changes to definitions of patient classifications
- Staff recommendations for inspection frequency and type
- Review corrections and discussion of staff recommendations to Guidance Document 76-21.2.1 Veterinary Establishment Inspection Report (Kelli/Taryn Singleton, **pp 18-47**)
 - **Review of corrections**
 - Recommendation for consolidation of related regulations
 - Additional recommended guidance
 - Points value recommendations

New Business – Dr. Cockburn

Next Meeting – Ms. Moss

Meeting Adjournment – Dr. Cockburn

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

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
VETERINARY ESTABLISHMENT INSPECTIONS COMMITTEE
MEETING MINUTES
February 11, 2022**

TIME AND PLACE: A meeting of the Veterinary Establishment Inspections Committee (Committee) was called to order at 1:22 p.m. at the Department of Health Professions (DHP), Perimeter Center, 2nd Floor Conference Center, Training Room 1, 9960 Mayland Drive, Henrico, Virginia 23233.

PRESIDING OFFICER: Tregel Cockburn, DVM, Committee Chair

COMMITTEE MEMBERS PRESENT: Heather Carter, LVT
Tom Massie, DVM
Wendy Ashworth, DHP Senior Inspector

MEMBERS NOT PRESENT: Jason Bollenbeck, DVM, Virginia Medical Association of Virginia

STAFF PRESENT: Kelli Moss, Deputy Executive Director
Heather Pote, Senior Discipline Case Specialist
Melissa Moore, Discipline Case Administrator
Temple Ross, Licensing Specialist
Melody Morton, Deputy Director, Enforcement Division
Taryn Singleton, LVT, Discipline Case Specialist for Inspections

STAFF NOT PRESENT: Kelly Gottschalk, DVM, Veterinary Review Coordinator

CALL TO ORDER & QUORUM: Dr. Cockburn welcomed attendees and requested that Ms. Moss take a roll call of the committee members present.

With four members of the Committee present, a quorum was established.

WELCOME NEW MEMBERS AND STAFF: Dr. Cockburn welcomed two new members of the committee, Tom Massie, DVM, and Heather Carter, LVT. Ms. Moss introduced two new members of Board staff, Ms. Singleton and Ms. Moore.

MISSION STATEMENT: Dr. Cockburn read the Department of Health Professions' Mission Statement.

ORDERING OF AGENDA: No changes were made to the agenda.

PUBLIC COMMENT: No public comment was received.

APPROVAL OF MINUTES: The minutes from the May 19, 2021, meeting were approved as presented.

DISCUSSION ITEMS:

Review of Regulations

18 VAC 150-20-201(B)

Ms. Moss provided information for the Committee to review and discuss whether an amendment to this regulation is warranted to modify or clarify the location veterinarians may treat animals under an ambulatory establishment registration.

Ms. Ashworth moved to direct staff to draft an amendment to this regulation for the Committee's consideration. The motion was seconded by Ms. Carter.

A roll call vote was taken by Ms. Moss. The motion carried unanimously.

18VAC 150-20-195(B)

Ms. Moss provided information for the Committee to review and discuss the term "economic" animals in this regulation, which is not clearly defined within the regulations.

Dr. Massie moved that the Committee recommend to the full Board that the term "economic" be struck from this regulation. The motion was seconded by Ms. Carter.

A roll call vote was taken by Ms. Moss. The motion carried unanimously.

Ms. Ashworth moved to recommend to the full Board that the defined term "non-companion" replace "economic" in this regulation. Ms. Carter seconded.

A roll call vote was taken by Ms. Moss. The motion carried unanimously.

Guidance Document for VIC

Ms. Moss presented the Guidance Document drafted for Veterinarians-in-Charge, and asked the Committee to consider recommending that the full Board adopt this document as presented, or direct staff to incorporate its amendments to the draft document to present to the Committee at the next meeting.

The Committee discussed and recommended amendments to the draft document.

Dr. Massie moved to direct staff to prepare the amended draft document and present it to the Committee at the next meeting. The motion was seconded by Ms. Ashworth.

A roll call vote was taken by Ms. Moss. The motion carried unanimously.

Inspection Guidelines

Ms. Moss and staff provided information about the types of establishment inspections currently conducted and options for the Committee to consider to develop guidelines for conducting inspections.

Ms. Ashworth moved to direct staff to draft guidelines for inspections that incorporate virtual and focused inspections and that direct inspectors to expand inspections as warranted. The motion was seconded by Dr. Massie.

A roll call vote was taken by Ms. Moss. The motion carried unanimously.

NEW BUSINESS: No new business was presented.

NEXT MEETING: Ms. Moss informed the Committee that staff will conduct an availability poll and will schedule a series of meetings between April and June to develop recommendations to present to the full Board at its next regularly scheduled meeting on July 28, 2022.

ADJOURNMENT: With all business concluded, the meeting adjourned at 4:00 p.m.

Virginia Board of Veterinary Medicine

Veterinarian-in-Charge (VIC)

1. What is a Veterinarian-in-Charge (VIC)?
2. Is the VIC required to practice at the establishment?
3. What types of establishments require a VIC?
4. What are the responsibilities of the VIC?
5. How often does a VIC need to be on site in the establishment? How does the Board determine the VIC is in compliance with this regulation?
6. What are the VIC's responsibilities during a board inspection?
7. What are the VIC's responsibilities regarding drug security?
8. What is the VIC's responsibility if a facility is closing? How does the VIC inform the board? How are patient records maintained?
9. How is a change in VIC made?
10. Is the VIC responsible for employees? Is the VIC's responsible for unlicensed activity?
11. Is the VIC responsible for fee complaints from consumers/clients?
12. Is the VIC responsible for business practices if he is not the owner of the establishment?

1. What is a Veterinarian-in-Charge (VIC)?

- The VIC is required to be a veterinarian with an active Virginia license.
- The VIC is responsible for maintaining the veterinary establishment within the standards set by the Regulations Governing the Practice of Veterinary Medicine.
- The VIC ensures the establishment is complying with federal and state laws and regulations.
- The VIC notifies the board if the establishment closes.
- The VIC notifies the board when no longer acting as VIC.

[Regulations Governing the Practice of Veterinary Medicine](#) state the following:

18VAC150-20-10. Definitions.

"Veterinarian-in-charge" means a veterinarian who holds an active license in Virginia and who is responsible for maintaining a veterinary establishment within the standards set by this chapter, for complying with federal and state laws and regulations, and for notifying the board of the establishment's closure.

2. Is the VIC required to practice at the establishment?

The regulations are silent as to if or where the VIC practices. However, the VIC needs to maintain a current, active license in Virginia and be on site as necessary to provide routine oversight to the establishment.

[Regulations Governing the Practice of Veterinary Medicine](#) state the following:

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.

3. What types of establishments require a VIC?

Every establishment must be registered with the Board and must have a VIC who is registered to the establishment. Every veterinarian practicing in Virginia must be practicing from a registered establishment. Ownership of the practice is not affected by this requirement, so corporate owned or non-veterinarian owned practices must have a VIC. A practice with a single practitioner must be registered and have a VIC, usually the solo practitioner.

Regulations Governing the Practice of Veterinary Medicine state the following:

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 18VAC150-20-171. 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.

4. What are the responsibilities of the VIC?

The VIC should be familiar with all currently laws and regulations governing the practice of veterinary medicine in Virginia. These, along with guidance documents that help interpret and apply the laws and regulations, may be found under the Practitioner Resources tab at www.dhp.virginia.gov/Boards/VetMed.

The specific duties noted in the Board's regulations are as follows:

1. Regularly being onsite. See Question 5.
2. Maintaining the facility within the standards set forth in this chapter. See Question 6.
3. Drug security, including performing the biennial inventory. See Question 7.
4. Notifying the Board if the facility closes. See Question 8.
5. Notifying the Board immediately if he is no longer VIC. See Question 9.
6. Keeping the facility registration current. See Question 10.

Regulations Governing the Practice of Veterinary Medicine state the following:

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 within the standards set forth by this chapter.
3. Performing the biennial controlled substance inventory and ensuring compliance at the facility with any federal or state law relating to controlled substances as defined in § 54.1-3404 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 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.*

5. How often does a VIC need to be on site in the establishment? How does the Board determine the VIC is in compliance with this regulation?

Recognizing that time spent onsite will differ with practice type and hours of operation, the regulations do not state how often or how long a VIC must be in the establishment. However the regulations state that the VIC is responsible for being “on site as necessary to provide routine oversight” for patient safety and compliance with law and regulation. If an inspection or investigation of a complaint identifies deficiencies or violations relating to a VIC’s responsibility, action **may** be taken against the license of the VIC for violating this provision.

6. What are the VIC’s responsibilities during a board inspection?

The VIC is not required to be present for an inspection. However, the VIC is responsible for the oversight of the establishment, therefore deficiencies found during inspection **may** result in action against the VIC’s license. Inspectors conduct inspections with as little disruption to the practice as possible. Inspectors will require access to patient records, Schedules II through V invoices, Schedules II through V drug logs and records, and biennial inventories for all scheduled drugs on premises; therefore the VIC ~~should~~ must ensure that these are available.

The following [Guidance Documents](#) may be helpful.

[76-21.2.1](#) Veterinary Establishment Inspection Report.

[150-15](#) Disposition of Routine Inspection Violations

[150-26](#) Guidance on the regulations for veterinary establishments

7. What are the VIC’s responsibilities regarding drug security?

The VIC ensures the establishment is in compliance with laws and regulations, and this includes drug laws and regulations. The VIC is responsible for completing the biennial inventory of Schedules II through V drugs at the practice. The biennial inventory must include his or her signature and the date the inventory was conducted, and document whether the inventory was conducted at open or close of the business day. signing and dating and documenting whether the biennial controlled substance inventory of all controlled drugs at the practice that is was conducted at the open or close of a business day. In the event of an unexplained drug loss or theft of Schedules II through V drugs, the VIC must report the incident immediately to the Virginia Board of Veterinary Medicine, the Virginia Board of Pharmacy, and the DEA.

The following [Guidance Documents](#) may be helpful.

[150-13](#) Controlled Substances (Schedules II through VI) in Veterinary Practice

[150-16](#) Protocol to follow upon discovery of a loss or theft of drugs

[Regulations Governing the Practice of Veterinary Medicine](#) state the following:

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

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.

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.

8. What is the VIC's responsibility if a facility is closing? How does the VIC inform the board? How are patient records maintained?

The VIC is responsible for sending written notification to the Board of an establishment's closure 10 days prior to the closure by completing a form found under Veterinary Establishment [Forms](#) under Practitioner Resources tab on the Board's website.

- The VIC must ensure that patient records are available to owners/clients as outlined in Section 54.1-2405 of the *Code of Virginia* (Code), below.
- Patient records must be maintained and available for three years.
- The VIC must ensure that all Schedules II through VI drugs have been properly disposed.
 - Schedules II through V drugs must be destroyed or transferred to another entity such as another DEA registrant.
 - If destroyed, a DEA destruction form must be filled out and maintained.
 - If Schedules II through V drugs are transferred to another DEA registrant, an invoice should be created which includes the name and address of the DEA registrant transferring the drugs, the name and address of the DEA registrant receiving the drugs, all drugs, quantities, and form of the drugs (for example, injectable, tablet, capsule, etc.). There is no requirement that there be a cost of the drugs or that moneys need to be exchanged for the drugs.
 - For more information about Federal regulations governing controlled drugs, Drug Enforcement Administration (<https://www.deadiversion.usdoj.gov/>) may be helpful.

[Regulations Governing the Practice of Veterinary Medicine](#) state the following:

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

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

4. Notifying the board in writing of the closure of the registered facility 10 days prior to closure.

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.

§ 54.1-2405. Transfer of patient records in conjunction with closure, sale, or relocation of practice; notice required.

A. No person licensed, registered, or certified by one of the health regulatory boards under the Department shall transfer records pertaining to a current patient in conjunction with the closure, sale or relocation of a professional practice until such person has first attempted to notify the patient of the pending transfer, by mail, at the patient's last known address, and by publishing prior notice in a newspaper of general circulation within the provider's practice area, as specified in § 8.01-324. The notice shall specify that, at the written request of the patient or an authorized representative, the records or copies will be sent, within a reasonable time, to any other like-regulated provider of the patient's choice or provided to the patient pursuant to § 32.1-127.1:03. The notice shall also disclose whether any charges will be billed by the provider for supplying the patient or the provider chosen by the patient with the originals or copies of the patient's records. Such charges shall not exceed the actual costs of copying and mailing or delivering the records.

B. For the purposes of this section:

"Current patient" means a patient who has had a patient encounter with the provider or his professional practice during the two-year period immediately preceding the date of the record transfer.

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

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.

9. How is a change in VIC made?

As described in Question 4 above, a licensee who is no longer acting as the VIC of an establishment must immediately provide written notification to the Board. The VIC remains responsible for the establishment and stock of controlled drugs until a new VIC is registered or for five days, whichever occurs sooner. The VIC is a required in order to maintain an establishment's registration. Therefore, an application for a new registration, with the new VIC's name must be submitted five days prior to the change, found on the Board's website under [Forms](#). Until the Board receives a completed Change of VIC form and all applicable fees, the former VIC remains responsible for the establishment and its stock of controlled drugs.

Former VIC Responsibilities:

- Immediately notify the Board in writing they are no longer VIC
- Properly destroy or transfer to the new VIC's DEA registration all controlled drugs in accordance with all applicable state and federal laws and regulations

- Returning the previous establishment registration within five days following the date of the change

New VIC Responsibilities:

- At least five days prior to the change, the new VIC must submit an application for Change of VIC and applicable fees, notifying the Board on what date this change will occur.
- Prior to the open of business on the date of the change, perform (or oversee), date and sign a biennial inventory of every Schedules II through V drug on the premises.

If there are circumstances in which these activities cannot be completed, the Board should be contacted as soon as possible for additional guidance.

[Regulations Governing the Practice of Veterinary Medicine](#) state the following:

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

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.*

10. Q: Is the VIC responsible for employees? What is the VIC's responsibility for unlicensed activity?

The Board does not regulate any employment laws, but does regulate unlicensed activity. If an unlicensed person is performing duties restricted to a licensee, action against the VIC's license **may** result. Special attention should be directed to the requirements for preceptees and externs, as they require a formal relationship among a veterinarian a student, and a school. See the following regulations and guidance documents for further information pertaining to licensed and unlicensed activities.

[Regulations Governing the Practice of Veterinary Medicine](#) state the following:

18VAC150-20-10. Definitions.

The following words and terms when used in this chapter shall have the following meanings unless the context clearly indicates otherwise:

"Preceptee" or "extern" means a student who is enrolled and in good standing in an AVMA accredited college of veterinary medicine or AVMA accredited veterinary technology program and who is receiving practical experience under the supervision of a licensed veterinarian or licensed veterinary technician.

"Preceptorship" or "externship" means a formal arrangement between an AVMA accredited college of veterinary medicine or an AVMA accredited veterinary technology program and a veterinarian who is licensed by the board and responsible for the practice of the preceptee. A preceptorship or externship shall be overseen by faculty of the college or program.

18VAC150-20-140. Unprofessional conduct.

Unprofessional conduct as referenced in subdivision 5 of § 54.1-3807 of the Code of Virginia shall include the following:

- 2. Practicing veterinary medicine or equine dentistry where an unlicensed person has the authority to control the professional judgment of the licensed veterinarian or the equine dental technician*
- 10. Allowing unlicensed persons to perform acts restricted to the practice of veterinary medicine, veterinary technology, or an equine dental technician including any invasive procedure on a patient or delegation of tasks to persons who are not properly trained or authorized to perform such tasks.*

18VAC150-20-130. Requirements for practical training in a preceptorship or externship.

A. The practical training and employment of qualified students of veterinary medicine or veterinary technology shall be governed and controlled as follows:

1. A veterinary student who is enrolled and in good standing in a veterinary college or school accredited or approved by the AVMA may be engaged in a preceptorship or externship. A veterinary preceptee or extern may perform duties that constitute the practice of veterinary medicine for which he has received adequate instruction by the college or school and only under the on-premises supervision of a licensed veterinarian.

2. A veterinary technician student who is enrolled and in good standing in a veterinary technology program accredited or approved by the AVMA may be engaged in a preceptorship or externship. A veterinary technician preceptee or extern may perform duties that constitute the practice of veterinary technology for which he has received adequate instruction by the program and only under the on-premises supervision of a licensed veterinarian or licensed veterinary technician.

B. Whenever a veterinary preceptee or extern is performing surgery on a patient, either assisted or unassisted, the supervising veterinarian shall be in the operatory during the procedure. Prior to allowing a preceptee or extern in veterinary medicine to perform surgery on a patient unassisted by a licensed veterinarian, a licensed veterinarian shall receive written informed consent from the owner.

C. When there is a veterinary preceptee or extern practicing in the establishment, the supervising veterinarian shall disclose such practice to owners. The disclosure shall be by signage clearly visible to the public or by inclusion on an informed consent form.

D. A veterinarian or veterinary technician who supervises a preceptee or extern remains responsible for the care and treatment of the patient.

The following [Guidance Documents](#) may be helpful.

[150-1](#) Disposition of Cases Involving Applicants Practicing Veterinary Technology Prior to Licensure

[150-2](#) Guidance on Expanded Duties for Licensed Veterinary Technicians
[150-3](#) Preceptorships and Externships for Veterinary Technician Students

[150-12](#) Administration of rabies vaccinations

[150-19](#) Position on Delegation of Dental Polishing and Scaling

[150-20](#) Duties of an Unlicensed Veterinary Assistant

11. Is the VIC responsible for fee complaints from consumers/clients?

The board does not regulate fees charged for services provided.

12. Is the VIC responsible for business practices if he is not the owner of the establishment?

There are some business practices that **may** fall under the responsibility of the VIC.

Regulations Governing the Practice of Veterinary Medicine state the following:

18 VAC150-20-140 Unprofessional Conduct.

(2) Practicing veterinary medicine where an unlicensed person has the authority to control the professional judgement of the licensed veterinarian.

(5) Advertising in a manner that is false, deceptive, or misleading or that makes subjective claims of superiority.

(12) Refusing to release a copy of a valid prescription upon request from an owner, unless there are medical reasons documented in the patient record and the veterinarian would not dispense the medication from his own practice.

(14) Failing to release a copy of patient records when request by the owner; a law-enforcement entity; or a federal, state or local health regulatory agency.

(16) Committing an act constituting fraud, deceit, or misrepresentation in dealing with board or in the veterinarian-owner-patient relationship, or with the public.

DRAFT LANGUAGE FOR RECORDKEEPING REQUIREMENTS

18 VAC 150-20-195(B)

18VAC150-20-195. Recordkeeping.

A. An individual, legible, daily record of each patient treated shall ~~be maintained by the veterinarian at the registered veterinary establishment and shall~~ include at a minimum:

1. Name of the patient and the owner;
2. Identification of the treating veterinarian and of the person making the entry (Initials may be used if a master list that identifies the initials is maintained.);
3. Presenting complaint or reason for contact;
4. Date of contact;
5. Physical examination findings;
6. Tests and diagnostics performed and results;
7. Procedures performed, treatment given, and results;
8. Drugs administered, dispensed, or prescribed, including quantity, strength and dosage, and route of administration. For vaccines, identification of the lot and manufacturer shall be maintained;
9. Radiographs or digital images clearly labeled with identification of the establishment, the patient name, date taken, and anatomic specificity. If an original radiograph or digital image is transferred to another establishment or released to the owner, a record of this transfer or release shall be maintained on or with the patient's records; and
10. Any specific instructions for discharge or referrals to other practitioners.

~~B. An individual record shall be maintained on each patient, except that records for economic animals or litters of companion animals under the age of four months may be maintained on a per owner basis. Patient records, including radiographs or digital images, shall be kept for a period of three years following the last office visit or discharge of such animal from a veterinary establishment.~~

B. A legible, daily record for multiple, agricultural animals as defined in 18 VAC 150-20-10 or litters of companion animals under the age of four months may be maintained on a per-owner basis for any animals receiving the same diagnostics and/or treatment. All patient records maintained on a per-owner basis must include the information specified in 1 to 9, above, and must identify the location contact occurred, the number of animals, animal species, and animal breed. If

any animal(s) on the multi-patient record have a unique result or difference to numbers 1 to 9 above, an individual patient record shall be created for that animal.

C. All patient records, including radiographs or digital images, shall be maintained at the registered veterinary establishment kept for a period of three years following the last date of patient contact, office visit or discharge of such animal from a veterinary establishment.

DRAFT

18VAC150-20-201. Standards for ambulatory veterinary establishments.

A. Agricultural or equine ambulatory practice. An agricultural or equine ambulatory establishment is a mobile practice in which health care is performed at the location of the animal. Surgery on large animals may be performed as part of an agricultural or equine ambulatory practice provided the establishment has surgical supplies, instruments, and equipment commensurate with the kind of surgical procedures performed. All agricultural or equine ambulatory establishments shall meet the requirements of a stationary establishment for laboratory, radiology, and minimum equipment, with the exception of equipment for assisted ventilation.



**U. S. Department of Justice
Drug Enforcement Administration**

www.dea.gov

Springfield, Virginia 22152

FEB 25 2016

Dear Registrant:

This correspondence outlines the policy of the Drug Enforcement Administration (DEA) regarding the *Veterinary Mobility Act of 2014*, which became effective on August 1, 2014. It is the DEA's position that the new law should be interpreted exactly as it is written.

The *Veterinary Medicine Mobility Act of 2014* amended section 302(e) of the Controlled Substances Act, Title 21, United States Code, Section 822(e) (21 U.S.C. § 822(e)) to address separate registration requirements for veterinarians. Specifically, the Act states that a "registrant who is a veterinarian shall not be required to have a separate registration in order to transport and dispense controlled substances in the usual course of veterinary practice at a site other than the registrant's registered principal place of business or professional practice, so long as the site of transporting and dispensing is located in a State where the veterinarian is licensed to practice veterinary medicine and is not a principal place of business or professional practice."

A non-office setting that the veterinarian visits to treat animals on an occasional, as-needed basis would not be a principal place of business or professional practice. Although the following is not the only example covered by 21 U.S.C. § 822(e)(2), a prime example is that a veterinarian may dispense controlled substances while making "house calls" (e.g., at a stable) without being registered at that location. And, in such a scenario, the veterinarian **does not need to be registered with the DEA in the State where the dispensing occurs, as long as the veterinarian is registered in some other State and is licensed to practice veterinary medicine in the State where the dispensing occurs.**

Should you have any questions pertaining to this matter, please contact your local DEA Field office, or you may contact the DEA Office of Diversion Control, Liaison and Policy Section, at (202) 307-7297.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis J. Milione".

Louis J. Milione
Deputy Assistant Administrator
Office of Diversion Control

PROPOSED DEFINITIONS FOR AGRICULTURAL, EQUINE AND COMPANION ANIMALS

18VAC150-20-10. Definitions.

The following words and terms when used in this chapter shall have the following meanings unless the context clearly indicates otherwise:

“Agricultural animal” means cattle, sheep, goats, swine, poultry, captured or cultivated aquatic species, farm raised cervidae, camelidae, bees and any other species that is used for the production of fiber, meat, eggs, honey, milk and other animal food products.

“Equine animal” means any animal in the family equidae.

~~"Companion animal" means any animal not defined as agricultural or equine. dog, cat, horse, nonhuman primate, guinea pig, hamster, rabbit not raised for human food or fiber, exotic or native animal, reptile, exotic or native bird, or any feral animal or animal under the care, custody or ownership of a person or any animal that is bought, sold, traded, or bartered by any person. Agricultural animals, game species, or any animals regulated under federal law as research animals shall not be considered companion animals for the purposes of this chapter.~~



Virginia Board of Veterinary Medicine

9960 Mayland Drive, Suite 300
Henrico, VA 23233

www.dhp.virginia.gov/vet
Email: bovminspections@dhp.virginia.gov

Main: 804-597-4133
Fax: 804-939-5242

Registration Number:		Inspection Type:	
Name of Veterinary Establishment:		Inspection Results:	
Address:		Inspection Date:	
City:		Inspection Start Time and End Time: 24-hour format (13:00)	
State:		Inspector Name:	
Zip Code:		PMP Reporting Status:	
Establishment Hours of Operation:		Stationary:	
Establishment Phone Number:		Ambulatory:	
Establishment Fax Number:		Number of Mobile Units:	
Establishment Website:		Inspection Emailed To (person):	
Establishment Email:		Inspection Emailed To (email address):	
Veterinarian-in-Charge:		Inspector Comments Below:	
Veterinarian-in-Charge License Number:			
Veterinarian-in-Charge Phone Number:			
Veterinarian-in-Charge Email:			

Key			
C= Compliant	NC= Non Compliant	NC-R= Non Compliant Repeat Violation	NA= Not Applicable
"Written Response" details the steps taken to correct the deficiency			
"Proof of Correction Action" documents in the form of pictures, receipts for purchases, or written demonstration that corrective steps have been taken			
"Corrected on Site" does not require additional response			



Virginia Board of Veterinary Medicine

9960 Mayland Drive, Suite 300
Henrico, VA 23233

www.dhp.virginia.gov/vet
Email: vetbd@dhp.virginia.gov

Main: 804.367.4468
Fax: 804.527.4471

Registration Number:		Inspection Type:	
Name of Veterinary Establishment:		Inspection Results:	
Address:		Inspection Date:	
City:		Inspection Start Time and End Time: 24-hour format (13:00)	
State:		Inspector Name:	
Zip Code:		PMP Reporting Status:	
Establishment Hours of Operation:		Stationary:	
Establishment Phone Number:		Ambulatory:	
Establishment Fax Number:		Number of Mobile Units:	
Establishment Website:		Inspection Emailed To (person):	
Establishment Email:		Inspection Emailed To (email address):	
Veterinary-in-Charge:		Inspector Comments Below:	
Veterinary-in-Charge License Number:			
Veterinary-in-Charge Phone Number:			
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Licenses and Registrations - All Establishments		Result	Response	Notes
1	<p>18VAC150-20-30(A)</p> <p>All licenses and registrations issued by the board shall be posted in a place conspicuous to the public or available at the establishment where veterinary services are being provided. Licensees who do relief work in an establishment shall carry a license with them or post at the establishment. Ambulatory veterinary practices that do not have an office accessible to the public shall carry their licenses and registrations in their vehicles.</p> <p><u>Guidance:</u> A license or registration is considered to be in a "place conspicuous to the public" when it is hung in an area that is easily accessed by the public for review . The original license or registration (not a photocopy) should be posted or available for inspection. Duplicate copies of a license can be obtained through the Board of Veterinary Medicine's offices for a small fee.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written Response	
2	<p>§ 54.1-3805</p> <p>No person shall practice veterinary medicine or as a veterinary technician in this Commonwealth unless such person has been licensed by the Board.</p> <p><u>Violation:</u> Major - 5 points</p>		Written Response	
3	<p>18VAC150-20-70(A)</p> <p>Failure to renew an individual license shall cause a license to lapse and become invalid, and practice with a lapsed license may subject the licensee to disciplinary action by the board.</p> <p><u>Guidance:</u> All individual licenses must be current. An expired license will be reported as a violation and documentation of practicing without a valid license will be obtained.</p> <p><u>Violation:</u> Major - 5 points</p>		Written Response	
4	<p>18VAC150-20-185(B)</p> <p>All veterinary establishment registrations are current. Failure to renew a veterinary establishment permit shall cause the permit to lapse and become invalid.</p> <p><u>Guidance:</u> An expired registration will be reported as a violation and documentation of practicing without a valid registration will be obtained. Reinspection required after registration has been expired for more than 30 days.</p> <p><u>Violation:</u> Major - 5 points</p>		Written Response	

Veterinarian-in-Charge (VIC)		Result	Response	Notes
5	<p>18VAC150-20-180(A)</p> <p>Every veterinary establishment shall have a veterinarian-in-charge (VIC) who is registered with the Board in order to operate.</p> <p><u>Guidance:</u> When there is a change in the VIC, an application for a new permit, 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 permit naming a new veterinarian-in-charge shall be filed as soon as possible but no more than 10 days after the change. Days are counted as calendar days.</p> <p><u>Violation:</u> Major - 5 points</p>		Proof of Corrective Action	
6	<p>18VAC150-20-181(A)(1)</p> <p>Veterinarian-in-Charge is responsible for regularly being on site as necessary to provide routine oversight to the veterinary establishment for patient safety and compliance with law and regulation.</p> <p><u>Violation:</u> Major - 5 points</p>		Written Response	
7	<p>18VAC150-20-181(B)(4)</p> <p>Prior to opening of the business, on the date of the change of VIC, the new VIC 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.</p> <p><u>Violation:</u> Major - 5 points</p>		Written Response	
<p>Requirements for drug storage, dispensing, destruction, and records for all veterinary establishments.</p>		Result	Response	Notes
8	<p>18VAC150-20-190(A)</p> <p>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 § 801 et seq.) as well as applicable portions of Title 21 of the Code of Federal Regulations.</p> <p><u>Guidance:</u> This regulation incorporates by reference all applicable laws and regulations related to drug storage, dispensing, destruction, and records. It is not cited as a violation if there is a specific violation identified in this section of the inspection report form.</p> <p><u>Violation:</u> Major - 5 points</p>		Proof of Corrective Action	

9	18VAC150-20-190(B) § 54.1-3461 § 54.1-3462	
	Repackaged tablets and capsules dispensed for companion animals are in approved safety closure containers, except safety caps are not required when medication cannot be reasonably dispensed in such containers. A client requesting non-safety packaging shall be documented in the patient record.	Written Response
	<u>Guidance:</u> When drugs are taken from a stock bottle and put into another container at the time of dispensing, the drugs are considered to be repackaged. As provided in § 54.1-3300, the definition of “dispense” means to deliver a drug to an ultimate user or research subject by or pursuant to the lawful order of a practitioner, including the prescribing and administering, packaging, labeling or compounding necessary to prepare the substance for delivery.	
	<u>Violation:</u> Minor - 1 point	
10	18VAC150-20-190(C) § 54.1-3410	
	All drugs dispensed for companion animals shall be labeled with the following:	Proof of Corrective Action
	<ol style="list-style-type: none"> 1. Name and address of the facility; 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. <u>Guidance:</u> For drugs that do not have a pharmaceutical insert, consider providing information to clients about drug reactions, interactions and side effects. An uninformed client may receive misinformation from friends or the internet regarding a drug. <u>Violation:</u> Major - 5 points for no label; or 2 points for an incomplete label.	

11	18VAC150-20-190(D)(6)		Proof of Corrective Action	
<p>All veterinary establishment 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 Schedule II through V drugs with the exception provided in subdivision 6 of this subsection.</p> <p>6. Access to drugs by unlicensed persons shall be allowed only under the following conditions:</p> <ol style="list-style-type: none"> Animal is being kept at the establishment outside of the normal hours of operation, and a licensed practitioner is not present in the facility; The drugs are limited to those dispensed to a specific patient; and 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. <p><u>Guidance:</u> Only personnel designated in the subsection shall have access to Schedule II, III, IV and V drugs. Drug stocks in establishments where keys and lock combinations are accessible to staff or the public (i.e. keys left in the lock, on a counter, hung on a hook; or combinations widely distributed or posted) are not considered secure. If the key or the combination is not secure, the drugs are not secure. The veterinary establishment may want to ask self-assessment questions such as the following:</p> <ul style="list-style-type: none"> • Do procedures cover securing drugs from arrival at the establishment until administration to the patient or distribution to the client? • Are drugs that must be maintained in a secure manner ever stored in an unlocked refrigerator? • Are blank prescription pads lying around the office where anyone could tear one or more off? <p>An unlicensed person may receive and open packages with unknown contents that may potentially contain drugs. However, once it is determined that the contents include Schedule II, III, IV or V drugs, the handling of the package contents must be turned over to the veterinarian, veterinary technician, pharmacist or pharmacy technician.</p> <p><u>Violation:</u> Major - 5 points</p>				
12	18VAC150-20-190(D)(1)		Proof of Corrective Action	
<p>In a stationary establishment, the general stock of Schedule II through V drugs shall be stored in a securely locked cabinet or safe that is not easily movable.</p> <p><u>Violation:</u> Major - 5 points</p>				
13	18VAC150-20-190(D)(2)		Written Response	
<p>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.</p> <p><u>Guidance:</u> Working stock that is in use during a procedure or treatment must remain within eyesight and supervision of a veterinarian or veterinary technician at all times.</p>				
<p><u>Violation:</u> Major - 5 points</p>				

14	18VAC150-20-190(D)(3)			
<p>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.</p> <p><u>Violation:</u> Major - 5 points</p>			Written Response	
15	18VAC150-20-190(D)(4)			
<p>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.</p> <p><u>Violation:</u> Major - 5 points</p>			Written Response	
16	18VAC150-20-190(D)(5)			
§ 54.1-3404(E)				
<p>Whenever a theft of or any unusual loss of Schedule II through V drugs is discovered the VIC, 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 the DEA shall be in accordance with 21 CFR 1301.76(b). If the VIC 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.</p> <p><u>Guidance:</u> Whenever a theft or any other unusual loss of a controlled substance is discovered, the veterinarian-in-charge is required by state and federal laws and/or regulations to immediately report such theft or loss to all of the following:</p> <ol style="list-style-type: none"> 1. Virginia Board of Veterinary Medicine; 2. Virginia Board of Pharmacy; and 3. U.S. Drug Enforcement Administration. <p>The Boards of Veterinary Medicine and Pharmacy request written notification sent via email or letter. The Board of Veterinary Medicine recommends contacting local law enforcement. Reports to the DEA must be made in accordance with 21 C.F.R. § 1301.76(b).</p> <p><u>Violation:</u> Major - 3 points</p>			Proof of Corrective Action	

17	18VAC150-20-190(E)	<p>Schedules II through V 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 veterinary practice site with other inventory records.</p>		<p>Written Response</p>	
	<p><u>Guidance:</u> Inspectors will verify that Schedule II, III, IV and V drugs are properly destroyed in accordance with DEA requirements available at http://www.deadiversion.usdoj.gov/drug_disposal/index.html</p> <p>Disposal of Controlled Substances</p> <p>A practitioner may dispose of out-of-date, damaged, or otherwise unusable or unwanted controlled substances, including samples, by transferring them to a registrant who is authorized to receive such materials. These registrants are referred to as "Reverse Distributors." The practitioner should contact the local DEA field office for a list of authorized Reverse Distributors. Schedule I and II controlled substances should be transferred via the DEA Form 222, while Schedule III–V compounds may be transferred via invoice. The practitioner should maintain copies of the records documenting the transfer and disposal of controlled substances for a period of two years. It is recommended that Schedule VI drugs be destroyed in the same manner as Schedule III-V drugs. Expired drugs may be considered adulterated drugs, may not be transferred or donated, and must be destroyed as required by federal/state laws and regulations.</p> <p><u>Violation:</u> Major - 2 points</p>				
18	18VAC150-20-190(F)	<p>The drug storage area has appropriate provision for temperature control for all drugs and biologics. If drugs requiring refrigeration are maintained at the facility, they shall be kept in a refrigerator with 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 are maintained between 59°F and 86°F.</p>		<p>Proof of Corrective Action</p>	
	<p><u>Violation:</u> Major - 5 points</p>				

19	18VAC150-20-190(G)					
	<p>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.</p> <p><u>Guidance:</u> The expiration date on all drugs, including prepackaged stock, should be regularly checked and drugs that are expired shall be separated from working stock. A drug expires on the month, day and year listed on the container. If only a month and year are provided, drug expires on the last day of the month listed on container.</p> <p>Pursuant to the Code of Virginia, § 54.1-3401 defines “drug” to mean (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. A vaccine is considered to be a drug and should be removed from working stock once expired.</p> <p><u>Violation:</u> Major - 5 points for 6 or more expired drugs; or 4 points for 1-5 drugs expired 60 days or more; or 3 points for 1-5 drugs expired less than 60 days. If expired drugs are found in both less than 60 days or more than 60 day categories, the higher point value of 4 is assigned.</p>	<table border="1"> <tr> <td data-bbox="1209 66 1381 185"></td> <td data-bbox="1381 66 1591 185">Written Response</td> </tr> <tr> <td data-bbox="1209 185 1381 678"></td> <td data-bbox="1381 185 1591 678"></td> </tr> </table>		Written Response		
	Written Response					
20	18VAC150-20-190(H) § 54.1-3404					
	<p>A distribution record shall be maintained in addition to the patient’s record, in chronological order, for the administering and dispensing of Schedules II through V drugs. The distribution record shall include the following:</p> <ol style="list-style-type: none"> 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. <p><u>Guidance:</u> The veterinarian’s initials are acceptable to meet the requirement of “identification of the veterinarian.”</p> <p>When a veterinarian with a veterinary establishment registration uses the surgery facilities of another veterinary establishment, the drug distribution log(s) must clearly show whose controlled substances were used for what purpose. If the facility’s stock is used, the hospital log must show that the surgery was performed by a visiting veterinarian who has the patient record and a record of administration shall be maintained at the facility. If the visiting veterinarian uses his own stock of drugs, he must make entries in his own log and patient records and shall leave a copy of the record at the veterinary establishment where the surgery was performed.</p> <p><u>Violation:</u> Major - 5 points for no record; or 3 points for incomplete record or records not maintained in chronological order.</p>	<table border="1"> <tr> <td data-bbox="1209 764 1381 867"></td> <td data-bbox="1381 764 1591 867">Proof of Corrective Action</td> </tr> <tr> <td data-bbox="1209 867 1381 1341"></td> <td data-bbox="1381 867 1591 1341"></td> </tr> </table>		Proof of Corrective Action		
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21	18VAC150-20-190(I) § 54.1-3404					
	<p>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.</p>	<table border="1"> <tr> <td data-bbox="1209 1427 1381 1536"></td> <td data-bbox="1381 1427 1591 1536">Written Response</td> <td data-bbox="1591 1427 2053 1536" style="text-align: center;">P026</td> </tr> </table>		Written Response	P026	
	Written Response	P026				

	<p><u>Guidance:</u> The original invoices, not copies, need to be filed in chronological order. Do not file the invoices by supplier, by drug or any other filing method other than in chronological order.</p> <p><u>Violation:</u> Major - 5 points for no record; or 3 points for an incomplete record or a record not maintained for three years.</p>			
22	<p>18VAC150-20-190(J)</p> <p>§ 54.1-3404</p>			
	<p>A complete and accurate inventory of all Schedules II through V drugs shall be taken, dated, and signed on any date which is within two years of the previous biennial inventory.</p> <p>The biennial inventory:</p> <ol style="list-style-type: none"> 1. Must have the drug strength specified. 2. Shall indicate if it was taken at the opening or closing of business. 3. Shall be maintained on premises where the drugs are held for two years from the date of taking the inventory. 		Written Response	
	<p><u>Guidance:</u> The inventory must be taken on any date which is within two year of the previous inventory, but may be taken more often. The purpose of indicating whether the biennial inventory was taken at the opening or closing of business is to determine whether the drugs received or used on the day of the inventory should be counted, if a drug audit is conducted. Expired Schedule II through V drugs that are removed from working stock but still on premises during a biennial inventory must be counted. The performance of the biennial inventory may be delegated to another licensee, provided the VIC signs and dates the inventory and remains responsible for its content and accuracy.</p> <p><u>Violation:</u> Major - 5 points if inventory not done within two years of the previous inventory and/or is missing required information; or 3 points if the inventory is only missing required information.</p>			
23	<p>18VAC150-20-190(K)</p>			
	<p>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 records. 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.</p> <p><u>Violation:</u> Major - 5 points if inventory not done monthly and/or is missing required information; or 3 points if the inventory is only missing required information.</p>		Written Response	
24	<p>18VAC150-20-190(L)</p>			
	<p>Every veterinary establishment licensed by the Board of Veterinary Medicine shall maintain records of the dispensing of feline buprenorphine and canine butorphanol, reconcile such records monthly, and make such records available for inspection upon request.</p> <p><u>Violation:</u> Major - 5 points for no record; or 3 points for incomplete record(s). Requirement for the dispensing records is new; non-compliance will be noted, but no violation will be cited for failure to maintain the required records until July 1, 2020.</p>		Written Response	

25	18VAC150-20-190(N)			
<p>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 veterinarians 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.</p> <p><u>Violation:</u> Major - 5 points for no record; or 3 points for incomplete record(s).</p>			Written Response	
Bulk Reconstitution of Injectable, Bulk Compounding or Prepackaging		Result	Response	Notes
26	18VAC150-20-190(M)			
<p>Veterinary establishments in which bulk reconstitution of injectable, bulk compounding or the prepackaging of drugs is performed shall maintain adequate control records for a period of one year or until the expiration, whichever is greater.</p>			Written Response	
<p>Reconstitution, compounding and prepackaging records shall show the following:</p>				
<ol style="list-style-type: none"> 1. Name of the drugs used; 2. Strength, if any; 3. Date repackaged; 4. Quantity prepared; 5. Initials of the veterinarian verifying the process; 6. Assigned lot or control number; 7. Manufacturer's or distributor's name and lot or control number; and 8. Expiration date. 				
<p><u>Guidance:</u> When drugs are taken from a stock bottle and put into another container prior to prescribing in anticipation of future dispensing, the drugs are considered to be prepackaged. Dispensing, labeling and recordkeeping requirements must be followed when prepackaging drugs.</p>				
<p>Transferring drugs to another container can affect the stability of the product. Expiration dates play an important role in maintaining the stability of a drug. The expiration date for a drug prepackaged is the same as the original stock bottle or is one year from the date of transfer whichever is less. It is best practice to store drugs under conditions which meet the United States Pharmacopeia and the National Formulary (USP-NF) specifications or manufacturers' suggested storage for each drug.</p> <p><u>Violation:</u> Major - 2 points</p>				
Patient/Medical Recordkeeping		Result	Response	Notes
27	18VAC150-20-200(A)(6)(f)			
<p>All veterinary establishments must have storage for records.</p>			Written Response	
<p><u>Violation:</u> Major - 2 points</p>				

28	18VAC150-20-195(A)							
	<p>A legible, daily record of each patient treated shall be maintained at the veterinary establishment and shall include at a minimum:</p> <ol style="list-style-type: none"> 1. Name of the patient and the owner; 2. Identification of the treating veterinarian and of the person making the entry (Initials may be used if a master list that identifies the initials is maintained.); 3. Presenting complaint or reason for contact; 4. Date of contact; 5. Physical examination findings; 6. Tests and diagnostics performed and results; 7. Procedures performed, treatment given, and results; 8. Drugs administered, dispensed or prescribed, including quantity, strength and dosage, and route of administration. For vaccines identification of the lot and manufacturer shall be maintained; 9. Radiographs or digital images clearly labeled with identification of the establishment the patient name, date taken, and anatomic specificity. If an original radiograph or digital image is transferred to another establishment or released to the owner, a records of this transfer or release shall be maintained on or with the patient's records; and 10. Any specific instructions for discharge or referrals to other practitioners. <p><u>Guidance:</u> A medical record should allow any veterinarian, by reading the record, to proceed with the proper treatment and care of the animal and allow the Board or other agency to determine the advice and treatment recommended and performed by the practitioner.</p> <p>The use of preprinted forms, stamps, or stickers is encouraged. Standardized medical abbreviations may be used to make recordkeeping. Handwritten records must be legible to be useful. If the veterinarian discovers that the record is incomplete or in error, the veterinarian may amend the record, being sure to date and initial when the amendment was made. Each record entry should be dated and identify the person making the entry.</p> <p><u>Violation:</u> 5 points for no records; or 3 points for only missing required information.</p>	<table border="1"> <tr> <td data-bbox="1209 82 1381 185"></td> <td data-bbox="1381 82 1591 185">Written Response</td> </tr> <tr> <td data-bbox="1209 185 1381 686"></td> <td data-bbox="1381 185 1591 686"></td> </tr> <tr> <td data-bbox="1209 686 1381 979"></td> <td data-bbox="1381 686 1591 979"></td> </tr> </table>		Written Response				
	Written Response							
29	18VAC150-20-195(B)							
30	18VAC150-20-195(C)							
	<p>An individual record shall be maintained on each patient, except that records for economic animals or litters of companion animals under the age of four months may have records maintained on a per owner basis. Patient records, including radiographs or digital images, shall be kept for a period of three years following the last office visit or discharge of such animal from a veterinary establishment.</p> <p><u>Violation:</u> 3 points if individual records not maintained on each patient; and/or 1 point if records not maintained for required time period.</p>	<table border="1"> <tr> <td data-bbox="1209 1027 1381 1159"></td> <td data-bbox="1381 1027 1591 1159">Written Response</td> </tr> <tr> <td data-bbox="1209 1159 1381 1230"></td> <td data-bbox="1381 1159 1591 1230"></td> </tr> </table>		Written Response				
	Written Response							
	<p>An initial rabies certificate for an animal receiving a primary rabies vaccination shall clearly display the following information: "An animal is not considered immunized for at least 28 days after the initial or primary vaccination is administered."</p> <p><u>Violation:</u> Major - 2 points</p>	<table border="1"> <tr> <td data-bbox="1209 1271 1381 1373"></td> <td data-bbox="1381 1271 1591 1373">Proof of Corrective Action</td> </tr> <tr> <td data-bbox="1209 1373 1381 1411"></td> <td data-bbox="1381 1373 1591 1411"></td> </tr> </table>		Proof of Corrective Action				
	Proof of Corrective Action							

All Veterinary Establishments		Result	Response	Notes
31	18VAC150-20-130(C) When there is a veterinary preceptee or extern practicing in the establishment, the supervising veterinarian shall disclose such practice to owners. The disclosure shall be by signage clearly visible to the public or by inclusion on an informed consent form. <u>Violation:</u> Minor - 1 point		Written Response	
All Stationary Veterinary Establishments		Result	Response	Notes
32	18VAC150-20-200(D) A separate establishment registration is required for separate practices that share the same location. <u>Violation:</u> Major - 5 points		Written Response	
Establishments Performing Surgery		Result	Response	Notes
33	18VAC150-20-200(A)(2)(c) The areas within the facility shall include a room that is reserved only for surgery and used for no other purpose. <u>Violation:</u> Minor - 1 point		Written Response	
34	18VAC150-20-200(A)(2)(c)(1) The surgery room shall have walls constructed of nonporous material and extending from the floor to ceiling. <u>Violation:</u> Minor - 1 point		Proof of Corrective Action	
35	18VAC150-20-200(A)(2)(c)(2) The surgery room shall be of a size adequate to accommodate a surgical table, anesthesia support equipment, surgical supplies, and all personnel necessary for safe performance of the surgery. <u>Violation:</u> Minor - 1 point		Proof of Corrective Action	
36	18VAC150-20-200(A)(2)(c)(3) The surgery room shall be kept so that storage in the surgery room shall be limited to items and equipment normally related to surgery and surgical procedures. <u>Guidance:</u> Items that are not normally related to surgery may not be stored in the surgery room. Dentistry can include surgical procedures (for example: extractions, fistula repair, subgingival cleaning, etc.) Therefore, dental units may be stored and used in a surgery room. <u>Violation:</u> Minor - 1 point		Proof of Corrective Action	

37	18VAC150-20-200(A)(2)(c)(4)			
	<p>The surgery room shall have a surgical table made of non-porous material.</p> <p><u>Violation:</u> Minor - 1 point</p>	<input type="checkbox"/>	Proof of Corrective Action	
38	18VAC150-20-200(A)(2)(c)(5)			
	<p>The surgery room shall have surgical supplies, instruments, and equipment commensurate with the kind of services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	<input type="checkbox"/>	Proof of Corrective Action	
39	18VAC150-20-200(A)(2)(c)(6)			
	<p>The surgery room shall surgical and automatic emergency lighting to facilitate performance of procedures.</p> <p><u>Guidance:</u> Section 150-20-10 of the Regulations Governing the Practice of Veterinary Medicine defines “automatic emergency lighting” to mean lighting which is powered by battery, generator, or alternate power source other than electrical power, is activated automatically by electrical power failure, and provides sufficient light to complete surgery or to stabilize the animal until surgery can be continued or the animal moved to another establishment.</p> <p><u>Violation:</u> Minor - 1 point</p>	<input type="checkbox"/>	Proof of Corrective Action	
40	18VAC150-20-200(A)(2)(c)(7)			
	<p>The surgery room for establishments that perform surgery on small animals, have a door to close off the surgery room from other areas of the practice.</p> <p><u>Violation:</u> Minor - 1 point</p>	<input type="checkbox"/>	Proof of Corrective Action	
41	18VAC150-20-180(A)(3)			
	<p>Any addition or renovation of a stationary establishment or 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.</p> <p><u>Violation:</u> Minor - 1 point</p>	<input type="checkbox"/>	Written Response	

Laboratory		Result	Response	Notes
42	<p>18VAC150-20-200(A)(3)</p> <p>The veterinary establishment shall have, at a minimum, proof of use of either in-house laboratory service or outside laboratory services for performing lab tests, consistent with appropriate professional care for the species being treated.</p> <p><u>Guidance:</u> Stationary facilities open 24 hours a day are required to have onsite laboratory services. For all other veterinary establishments which may opt to use an outside laboratory service, a letter, email, or invoice may serve as documentation for compliance purposes.</p> <p><u>Violation:</u> Major - 5 points</p>		Proof of Corrective Action	
Housing		Result	Response	Notes
43	<p>18VAC150-20-200(A)(4)(a)</p> <p>For housing animals, the establishment shall provide an animal identification system at all times when housing an animal.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written Response	
44	<p>18VAC150-20-200(A)(4)(b)</p> <p>For housing animals, the establishment shall provide accommodations of appropriate size and construction to prevent residual contamination or injury.</p> <p><u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	
45	<p>18VAC150-20-200(A)(4)(c)</p> <p>For housing animals, the establishment shall provide accommodations allowing for the effective separation of contagious and noncontagious patients.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	
46	<p>18VAC150-20-200(A)(4)(d)</p> <p>For housing animals, the establishment shall provide exercise areas that provide and allow effective separation of animals or walking the animals at medically appropriate intervals.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written Response	

Radiology		Result	Response	Notes
47	<p>18VAC150-20-200(A)(5)</p> <p>A veterinary establishment shall either have radiology service in-house or documentation of outside service for obtaining diagnostic-quality radiographs.</p> <p><u>Guidance:</u> Stationary facilities open 24 hours a day are required to have onsite radiology/imaging services. For all other veterinary establishments which may opt to use an outside radiology/imaging service, a letter, email, or invoice may serve as documentation for compliance purposes.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	
48	<p>18VAC150-20-200(A)(5)(a)</p> <p>If radiology is in-house, the establishment shall document that radiographic equipment complies with Part VI (12VAC5-481-1581 et seq.), Use of Diagnostic X-Rays in the Healing Arts, of the Virginia Radiation Protection Regulations of the Virginia Department of Health.</p> <p><u>Guidance:</u> Dental units are considered to be radiographic equipment.</p> <p><u>Violation:</u> Major - 5 points</p>		Proof of Corrective Action	
49	<p>Proof of Corrective Action</p> <p>If radiology is in-house, maintain and utilize lead aprons and gloves and individual radiation exposure badges for each employee exposed to radiographs.</p> <p><u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.</p> <p><u>Violation:</u> Major - 5 points</p>		Proof of Corrective Action	

Minimum Equipment		Result	Response	Notes
50	18VAC150-20-200(A)(6)(a) Minimum equipment in the establishment shall include an appropriate method of sterilizing instruments. <u>Guidance:</u> Veterinary establishments must have an appropriate method of sterilizing instruments. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided. <u>Violation:</u> Minor - 1 point		Proof of Corrective Action	
51	18VAC150-20-200(A)(6)(b) Minimum equipment in the establishment shall include internal and external sterilization monitors. <u>Guidance:</u> Veterinary establishments must have an appropriate method for internal and external sterilization monitoring. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided. <u>Violation:</u> Minor - 1 point		Proof of Corrective Action	
52	18VAC150-20-200(A)(6)(c) Minimum equipment in the establishment shall include a stethoscope. <u>Violation:</u> Minor - 1 point		Written Response	
53	18VAC150-20-200(A)(6)(e) Minimum equipment in the establishment shall include adequate means of determining patient's weight. <u>Guidance:</u> Veterinary establishments must have an appropriate method of determining a patient's weight. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided. <u>Violation:</u> Minor - 1 point		Written Response	

Stationary Veterinary Establishments - Open 24 hours/day		Result	Response	Notes
1	18VAC150-20-200(B)(1)			
	A stationary establishment that is open to the public 24 hours a day shall have licensed personnel on premises at all times and shall be equipped to handle emergency critical care and hospitalization. The establishment shall have radiology/imaging and laboratory services available on site. <u>Violation:</u> Major - 5 points		Written Response	
Buildings and Grounds		Result	Response	Notes
2	18VAC150-20-200(A)(1)			
	Buildings and ground must be maintained to provide sanitary facilities for the care and medical well-being of patients. <u>Violation:</u> Major - 2 points		Written Response	
3	18VAC150-20-200(A)(1)(a)			
	Temperature, ventilation, and lighting must be consistent with the medical well-being of patients. <u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided. <u>Violation:</u> Minor - 1 point		Written Response	
4	18VAC150-20-200(A)(1)(b)(1)			
	There shall be on premises hot and cold running water of drinking quality, as defined by the Virginia Department of Health. <u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided. <u>Violation:</u> Minor - 1 point		Written Response	

5	<p>18VAC150-20-200(A)(1)(b)(2)</p> <p>There shall be on premises an acceptable method of disposal of deceased animals, in accordance with any local ordinance or state and federal regulations.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written Response	
6	<p>18VAC150-20-200(A)(1)(b)(3)</p> <p>There shall be on premises refrigeration exclusively for carcasses of companion animals that require storage for 24 hours or more.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	
7	<p>18VAC150-20-200(A)(1)(c)</p> <p>Sanitary toilet and lavatory shall be available for personnel and owners.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written Response	
8	<p>18VAC150-20-200(A)(2)(a)</p> <p>The areas within the facility shall include a reception area separate from other designated rooms.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	
9	<p>18VAC150-20-200(A)(2)(b)</p> <p>The areas within the facility shall include an examination room or rooms containing a table or tables with nonporous surfaces.</p> <p><u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	

Minimum Equipment		Result	Response	Notes
10	<p>18VAC150-20-200(A)(6)(d)</p> <p>Minimum equipment in the establishment shall include equipment for delivery of assisted ventilation appropriate to the species being treated, including endotracheal tubes.</p> <p><u>Guidance:</u> Ambulatory agricultural/equine and house call/proceduralist veterinary establishment are exempt from meeting the requirements for assisted ventilation. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	

Stationary Veterinary Establishments - Open < 24 hours/day		Result	Response	Notes
1	18VAC150-20-200(B)(2) § 54.1-3806.1			
	A stationary establishment that is not open to the public 24 hours a day shall have licensed personnel available during its advertised hours of operation and shall disclose to the public that the establishment does not have continuous staff, in compliance with § 54.1-3806.1 of the Code of Virginia. <u>Guidance:</u> The Disclosure form cannot be printed on the front or back of another document. It can be smaller than a standard piece of paper. <u>Violation:</u> 3 points for missing form; and/or 1 point if form not compliant.		Written Response	
Buildings and Grounds		Result	Response	Notes
2	18VAC150-20-200(A)(1)			
	Buildings and ground must be maintained to provide sanitary facilities for the care and medical well-being of patients. <u>Violation:</u> Major - 2 points		Written Response	
3	18VAC150-20-200(A)(1)(a)			
	Temperature, ventilation, and lighting must be consistent with the medical well-being of patients. <u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided. <u>Violation:</u> Minor - 1 point		Written Response	
4	18VAC150-20-200(A)(1)(b)(1)			
	There shall be on premises hot and cold running water of drinking quality, as defined by the Virginia Department of Health. <u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided. <u>Violation:</u> Minor - 1 point		Written Response	

5	<p>18VAC150-20-200(A)(1)(b)(2)</p> <p>There shall be on premises an acceptable method of disposal of deceased animals, in accordance with any local ordinance or state and federal regulations.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written Response	
6	<p>18VAC150-20-200(A)(1)(b)(3)</p> <p>There shall be on premises refrigeration exclusively for carcasses of companion animals that require storage for 24 hours or more.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	
7	<p>18VAC150-20-200(A)(1)(c)</p> <p>Sanitary toilet and lavatory shall be available for personnel and owners.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written Response	
8	<p>18VAC150-20-200(A)(2)(a)</p> <p>The areas within the facility shall include a reception area separate from other designated rooms.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	
9	<p>18VAC150-20-200(A)(2)(b)</p> <p>The areas within the facility shall include an examination room or rooms containing a table or tables with nonporous surfaces.</p> <p><u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	

Minimum Equipment		Result	Response	Notes
10	<p>18VAC150-20-200(A)(6)(d)</p> <p>Minimum equipment in the establishment shall include equipment for delivery of assisted ventilation appropriate to the species being treated, including endotracheal tubes.</p> <p><u>Guidance:</u> Ambulatory agricultural/equine and house call/proceduralist veterinary establishment are exempt from meeting the requirements for assisted ventilation. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action	

Stationary Veterinary Establishments - Limited		Result	Response	Notes
1	18VAC150-20-200(C)			
	When the scope of practice is less than full service, a specifically limited [stationary] establishment registration shall be required. Such establishments shall have posted in a conspicuous manner the specific limitations on the scope of practice on a form provided by the board.		Written Response	
	<u>Guidance:</u> The registration will include any limitations and will be considered the “form provided by the board.” A registration is considered to be in a “place conspicuous to the public” when it is hung in an area that is easily accessed and read by the public. The original license or registration (not a photocopy) should be posted or available for inspection. Duplicate copies of a registration can be obtained through the Board of Veterinary Medicine’s office for a small fee. Any license or registration that is expired will be reported and documentation of practicing without a valid license or permit will be obtained.			
	<u>Violation:</u> Minor - 1 point			
2	18VAC150-20-200(B)(2) § 54.1-3806.1			
	A stationary establishment that is not open to the public 24 hours a day shall have licensed personnel available during its advertised hours of operation and shall disclose to the public that the establishment does not have continuous staff, in compliance with § 54.1-3806.1 of the Code of Virginia.		Written Response	
	<u>Guidance:</u> The Disclosure form cannot be printed on the front or back of another document. It can be smaller than a standard piece of paper.			
	<u>Violation:</u> 3 points for missing form; and/or 1 point if form not compliant.			
Buildings and Grounds		Result	Response	Notes
3	18VAC150-20-200(A)(1)			
	Buildings and ground must be maintained to provide sanitary facilities for the care and medical well-being of patients.		Written Response	
	<u>Violation:</u> Major - 2 points			

4	18VAC150-20-200(A)(1)(a)			
	<p>Temperature, ventilation, and lighting must be consistent with the medical well-being of patients.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Written Response		
5	18VAC150-20-200(A)(1)(b)(1)			
	<p>There shall be on premises hot and cold running water of drinking quality, as defined by the Virginia Department of Health.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Written Response		
6	18VAC150-20-200(A)(1)(b)(2)			
	<p>There shall be on premises an acceptable method of disposal of deceased animals, in accordance with any local ordinance or state and federal regulations.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Written Response		
7	18VAC150-20-200(A)(1)(b)(3)			
	<p>There shall be on premises refrigeration exclusively for carcasses of companion animals that require storage for 24 hours or more.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Proof of Corrective Action		
8	18VAC150-20-200(A)(1)(c)			
	<p>Sanitary toilet and lavatory shall be available for personnel and owners.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Written Response		

9	<p>18VAC150-20-200(A)(2)(a)</p> <p>The areas within the facility shall include a reception area separate from other designated rooms.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		<p>Proof of Corrective Action</p>	
10	<p>18VAC150-20-200(A)(2)(b)</p> <p>The areas within the facility shall include an examination room or rooms containing a table or tables with nonporous surfaces.</p> <p><u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		<p>Proof of Corrective Action</p>	
Minimum Equipment		Result	Response	Notes
11	<p>18VAC150-20-200(A)(6)(d)</p> <p>Minimum equipment in the establishment shall include equipment for delivery of assisted ventilation appropriate to the species being treated, including endotracheal tubes.</p> <p><u>Guidance:</u> Ambulatory agricultural/equine and house call/proceduralist veterinary establishment are exempt from meeting the requirements for assisted ventilation. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		<p>Proof of Corrective Action</p>	

Ambulatory Veterinary Establishments - Agricultural and Equine Establishments		Result	Response	Notes
1	18VAC150-20-201(A)			
	An agricultural or equine ambulatory establishment is a mobile practice in which health care is performed at the location of the animal. Surgery may be performed as part of an agricultural or equine ambulatory practice provided the establishment has surgical supplies, instruments, and equipment commensurate with the kind of surgical procedures performed. <u>Violation:</u> Major - 5 points		Written Response	
Ambulatory Veterinary Establishments - House Call or Proceduralist Establishment		Result	Response	Notes
2	18VAC150-20-200(B)			
	A house call or proceduralist establishment is an ambulatory practice in which health care of small animals is performed at the residence of the owner of the small animal or another establishment registered by the board. A veterinarian who has established a veterinarian-owner-patient relationship with an animal at the owner's residence or at another registered veterinary establishment may also provide care for that animal at the location of the animal. <u>Violation:</u> Major - 5 points		Written Response	
3	18VAC150-20-200(B)(1)			
	A house call or proceduralist practice may only perform surgery in a surgical suite at a registered establishment that has passed inspection. However, surgery requiring only local anesthetics may be performed at a location other than in a surgical suite. <u>Guidance:</u> The locations where surgeries are performed should be maintained for the inspector's review. The house call or proceduralist practice is compliant if the surgery suite used was inspected and part of another registered veterinary establishment. <u>Violation:</u> Major - 5 points		Written Response	

Ambulatory Veterinary Establishments - Mobile Service		Result	Response	Notes
18VAC150-20-201(C)				
A mobile service establishment is a veterinary clinic or hospital that can be moved from one location to another and from which veterinary services are provided. A mobile service establishment shall meet all the requirements of a stationary establishment appropriate for the services provided.			Written Response	
<u>Violation:</u> Major - 5 points				
Buildings and Grounds		Result	Response	Notes
1 18VAC150-20-200(A)(1)				
Buildings and ground must be maintained to provide sanitary facilities for the care and medical well-being of patients.			Written Response	
<u>Violation:</u> Major - 2 points				
2 18VAC150-20-200(A)(1)(a)				
Temperature, ventilation, and lighting must be consistent with the medical well-being of patients.			Written Response	
<u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.				
<u>Violation:</u> Minor - 1 point				
3 18VAC150-20-200(A)(1)(b)(1)				
There shall be on premises hot and cold running water of drinking quality, as defined by the Virginia Department of Health.			Written Response	
<u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.				
<u>Violation:</u> Minor - 1 point				

4	18VAC150-20-200(A)(1)(b)(2)		
	<p>There shall be on premises an acceptable method of disposal of deceased animals, in accordance with any local ordinance or state and federal regulations.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written Response
5	18VAC150-20-200(A)(1)(b)(3)		
	<p>There shall be on premises refrigeration exclusively for carcasses of companion animals that require storage for 24 hours or more.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action
6	18VAC150-20-200(A)(1)(c)		
	<p>Sanitary toilet and lavatory shall be available for personnel and owners.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written Response
7	18VAC150-20-200(A)(2)(a)		
	<p>The areas within the facility shall include a reception area separate from other designated rooms.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action
8	18VAC150-20-200(A)(2)(b)		
	<p>The areas within the facility shall include an examination room or rooms containing a table or tables with nonporous surfaces.</p> <p><u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Corrective Action

Minimum Equipment		Result	Response	Notes
9	<p>18VAC150-20-200(A)(6)(d)</p> <p>Minimum equipment in the establishment shall include equipment for delivery of assisted ventilation appropriate to the species being treated, including endotracheal tubes.</p> <p><u>Guidance:</u> Ambulatory agricultural/equine and house call/proceduralist veterinary establishment are exempt from meeting the requirements for assisted ventilation. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		<p>Proof of Corrective Action</p>	