



townhall.virginia.gov

Proposed Regulation Agency Background Document

Agency name	Board of Veterinary Medicine, Department of Health Professions
Virginia Administrative Code (VAC) citation(s)	18VAC150-20-10 et seq.
Regulation title(s)	Regulations Governing the Practice of Veterinary Medicine
Action title	Elimination of restriction on practical training in veterinary college
Date this document prepared	7/22/15

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Orders 17 (2014) and 58 (1999), and the *Virginia Register Form, Style, and Procedure Manual*.

Brief summary

Please provide a brief summary (preferably no more than 2 or 3 paragraphs) of the proposed new regulation, proposed amendments to the existing regulation, or the regulation proposed to be repealed. Alert the reader to all substantive matters or changes. If applicable, generally describe the existing regulation.

The purpose of the regulatory action is to eliminate a burdensome restriction on the preceptorships for veterinary students in which they gain practical experience under the direct supervision of a licensed veterinarian. Currently, students are not allowed to be engaged in a preceptorship until their final year in veterinary college. Therefore, they do not have the opportunity to practice what they are learning in the first three years and believe that they are less skillful and competent as practitioners when they graduate. The amendment is strongly supported by the Virginia/Maryland Regional College of Veterinary Medicine.

The action also includes requirements for disclosure about a preceptee practicing at a veterinary establishment and informed consent for surgery on an animal.

Acronyms and Definitions

Please define all acronyms used in the Agency Background Document. Also, please define any technical terms that are used in the document that are not also defined in the “Definition” section of the regulations.

N/A

Legal basis

Please identify the state and/or federal legal authority to promulgate this proposed regulation, including: 1) the most relevant citations to the Code of Virginia or General Assembly chapter number(s), if applicable; and 2) promulgating entity, i.e., agency, board, or person. Your citation should include a specific provision authorizing the promulgating entity to regulate this specific subject or program, as well as a reference to the agency/board/person’s overall regulatory authority.

Chapter 24 of Title 54.1 establishes the general powers and duties of health regulatory boards, including the Board of Veterinary Medicine, the responsibility to promulgate regulations:

§ 54.1-2400. General powers and duties of health regulatory boards.--The general powers and duties of health regulatory boards shall be:

6. To promulgate regulations in accordance with the Administrative Process Act (§ 9-6.14:1 et seq.) which are reasonable and necessary to administer effectively the regulatory system. Such regulations shall not conflict with the purposes and intent of this chapter or of Chapter 1 and Chapter 25 of this title...

The specific authority of the Board relating to practical training for students of veterinary medicine is found in:

§ 54.1-3804. Specific powers of Board.

In addition to the powers granted in § 54.1-2400, the Board shall have the following specific powers and duties:

1. To establish essential requirements and standards for approval of veterinary programs.
2. To establish and monitor programs for the practical training of qualified students of veterinary medicine or veterinary technology in college or university programs of veterinary medicine or veterinary technology.

Purpose

Please explain the need for the new or amended regulation. Describe the rationale or justification of the proposed regulatory action. Describe the specific reasons the regulation is essential to protect the health, safety or welfare of citizens. Discuss the goals of the proposal and the problems the proposal is intended to solve.

The purpose of the regulatory action is to eliminate a burdensome restriction on the preceptorships for veterinary students in which they gain practical experience under the direct supervision of a licensed veterinarian. Currently, students are not allowed to be engaged in a preceptorship until their final year in veterinary college. Therefore, they do not have the opportunity to practice what they are learning in the first three years and believe that they are less skillful and competent as practitioners when they graduate. Since preceptees are restricted to perform only those tasks for which they have been adequately instructed and must practice under the on-premises supervision of a licensed veterinarian, the Board believes supervised practical experience through the course of veterinary college will be beneficial to patients and will adequately protect the health and safety of the public. Informed consent for surgery and disclosure about preceptee practice offers further protection and assurances for owners.

Substance

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

The amendment to section 130 requested by the petition for rule-making was as follows: *A veterinary student who is duly enrolled and in good standing in a veterinary college or school accredited or approved by the AVMA and in the final year of his training or after completion of an equivalent number of hours as approved by the board may be engaged in a preceptorship or externship.*

In addition to the requested change, the Board added provisions to reassure consumers that the veterinarian remains responsible for the animal, that the supervising veterinarian will be in the operatory with the preceptee whenever surgery is being performed, and that owners will be informed about a preceptee practicing in an establishment in order to have the right to specify who may treat the animal.

Also, the Board has added a new section on informed consent for surgery, so owners will have information about risks, benefits and alternatives, regardless of who is performing the surgery.

Issues

Please identify the issues associated with the proposed regulatory action, including: 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions; 2) the primary advantages and disadvantages to the agency or the Commonwealth; and 3) other pertinent matters of interest to the regulated community, government officials, and the public. If there are no disadvantages to the public or the Commonwealth, please indicate.

1) The primary advantage to the public is veterinary students will have more hands-on experience with animals when they receive their veterinary degree and a full license to practice. With the additional disclosures and informed consent, the Board believes consumers will know whether there is a preceptor working in a veterinary practice and whether that preceptor will be

involved with surgery on their animals. Consumers will have the option of refusing to have a preceptor doing any procedure on an animal; consequently, there should be no disadvantages to the public.

- 2) There are no advantages and disadvantages to the agency or the Commonwealth; and
- 3) There are no other pertinent matters of interest to the regulated community, government officials, and the public.

Requirements more restrictive than federal

Please identify and describe any requirement of the proposal which is more restrictive than applicable federal requirements. Include a rationale for the need for the more restrictive requirements. If there are no applicable federal requirements or no requirements that exceed applicable federal requirements, include a statement to that effect.

There are no applicable federal requirements.

Localities particularly affected

Please identify any locality particularly affected by the proposed regulation. Locality particularly affected means any locality which bears any identified disproportionate material impact which would not be experienced by other localities.

There are no localities particularly affected.

Public participation

Please include a statement that in addition to any other comments on the proposal, the agency is seeking comments on the costs and benefits of the proposal and the impacts of the regulated community.

In addition to any other comments, the Board of Veterinary Medicine is seeking comments on the costs and benefits of the proposal and the potential impacts of this regulatory proposal. Also, the agency/board is seeking information on impacts on small businesses as defined in § 2.2-4007.1 of the Code of Virginia. Information may include 1) projected reporting, recordkeeping and other administrative costs, 2) probable effect of the regulation on affected small businesses, and 3) description of less intrusive or costly alternative methods of achieving the purpose of the regulation.

Anyone wishing to submit written comments may do so via the Regulatory Townhall website, www.townhall.virginia.gov, or by mail to Elaine Yeatts at Department of Health Professions, 9960 Mayland Drive, Suite 300, Richmond, VA 23233 or elaine.yeatts@dhp.virginia.gov or by fax to (804) 527-4434. Comments may also be submitted through the Public Forum feature of the Virginia Regulatory Town Hall web site at: <http://www.townhall.virginia.gov>. Written comments must include the name and address of the commenter. In order to be considered, comments must be received by 11:59 pm on the last day of the public comment period.

A public hearing will be held following the publication of this stage and notice of the hearing will be posted on the Virginia Regulatory Town Hall website (<http://www.townhall.virginia.gov>) and on the Commonwealth Calendar website (<https://www.virginia.gov/connect/commonwealth-calendar>). Both oral and written comments may be submitted at that time.

Economic impact

Please identify the anticipated economic impact of the proposed new regulations or amendments to the existing regulation. When describing a particular economic impact, please specify which new requirement or change in requirement creates the anticipated economic impact.

<p>Projected cost to the state to implement and enforce the proposed regulation, including: a) fund source / fund detail; and b) a delineation of one-time versus on-going expenditures</p>	<p>a) As a special fund agency, the Board must generate sufficient revenue to cover its expenditures from non-general funds, specifically the renewal and application fees it charges to practitioners for necessary functions of regulation; b) The agency will incur no additional costs for mailings to the Public Participation Guidelines mailing lists, conducting a public hearing, and sending notice of final regulations to regulated entities. Since most mailings to the PPG list are handled electronically, there is very little cost involved. Every effort will be made to incorporate those into anticipated mailings and Board meetings already scheduled. There are no on-going expenditures.</p>
<p>Projected cost of the new regulations or changes to existing regulations on localities.</p>	<p>None</p>
<p>Description of the individuals, businesses, or other entities likely to be affected by the new regulations or changes to existing regulations.</p>	<p>Licensed veterinarians who serve as preceptors for veterinary students.</p>
<p>Agency’s best estimate of the number of such entities that will be affected. Please include an estimate of the number of small businesses affected. Small business means a business entity, including its affiliates, that: a) is independently owned and operated and; b) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million.</p>	<p>The Virginia-Maryland College of Veterinary Medicine approves preceptors for its students for practical experience. The number varies from year to year, and the Board has no registration for preceptors.</p>
<p>All projected costs of the new regulations or changes to existing regulations for affected individuals, businesses, or other entities. Please be specific and include all costs including: a) the projected reporting, recordkeeping, and other administrative costs required for compliance by small businesses; and b) specify any costs related to the development of real estate for commercial or residential purposes that are a consequence</p>	<p>The only costs associated with the proposed regulation would be the posting of signage at the establishment notifying the public that a preceptor was working in the practice. The veterinarian has the option of including that information on an consent form, so the only cost would be revision of the form.</p>

of the proposed regulatory changes or new regulations.	
Beneficial impact the regulation is designed to produce.	The beneficial impact will be additional practical training for students that will make them better prepared to practice independently as veterinarians after graduation.

Alternatives

Please describe any viable alternatives to the proposal considered and the rationale used by the agency to select the least burdensome or intrusive alternative that meets the essential purpose of the action. Also, include discussion of less intrusive or less costly alternatives for small businesses, as defined in § 2.2-4007.1 of the Code of Virginia, of achieving the purpose of the regulation.

No alternatives were considered as amendments to section 130 and the addition of section 173 are the least burdensome and intrusive alternative that meet the essential purpose of the action. The amendments are in response to a petition for rule-making which was supported by veterinary students and veterinarians. In response to comments on the NOIRA, the Board adopted additional protections and disclosures relating to the practice of preceptees in veterinary practices.

Regulatory flexibility analysis

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

There are no alternative regulatory methods, such as reporting requirements or performance standards.

Public comment

Please summarize all comments received during the public comment period following the publication of the NOIRA, and provide the agency response.

Commenter	Comment	Agency response
Lee Henkel	Does not support. Owners should have a right to withhold consent for practice by a student and should know if a student is performing surgery. Should restrict	Changes to section 130 requiring disclosure of student practice in the establishment and informed consent for surgery were adopted to address the

	<p>students to observation only until third year. Asserts that 25% of the approved practices for training have one or more veterinarians who have been fined or reprimanded.</p>	<p>comment. The Board does not concur with the restriction to observation; students are allowed to do only those tasks for which they have been appropriately trained and are supervised.</p> <p>Information from the commenter about disciplinary actions for veterinarians in approved preceptorship practices has not been confirmed, but the commenter acknowledges that the violations may have been failure to complete continuing education or an inspection deficiency.</p>
Susan Yamagata	Supports owner right to be notified and give or withhold consent	Same response as above; informed consent and disclosure provisions were added.
S. Monnette	Not opposed to students obtaining practical experience but owner should be notified.	Same response as above.
Jan Martucci	Same comment about owner consent and observation as above.	Same response as above.
K. W. Garland	Same comment about owner consent and observation as above.	Same response as above.
Al Stein	Supported comment from Ms. Henkel	Same response as above.
R Mingo	Same comment about observation and owner consent. Supervising veterinarians should have no reprimands.	Disciplinary action is a public record. Any consumer may check on the disciplinary history of a veterinarian (whether or not he/she is supervising a student) before choosing that practitioner to care for his animal. A reprimand may be given for a variety of reasons and does not automatically disqualify a practitioner from providing quality care.
Diane Sadowski	Should obtain permission from owner for student practice.	Disclosure and informed consent provisions added to regulation.
Patricia Finn	Support students gaining practical experience but owner should be notified. Supports Ms. Henkel's comment.	Same responses as above.
Peter Ajemian	Supports owner consent and informed decision.	Same response as above.
Richard Rutherford	Unthinkable that anyone other than a fully qualified veterinarian would provide care for pets. Owner notification and permission.	Students who graduate from veterinary school are "fully qualified" and granted licensure. The Board and the college believe they will be better qualified if they have had more practical experience. The Board does not believe it is necessary to have owner consent for every task a student (or an unlicensed assistant for that matter) might perform on an animal. Notice in the establishment about the use of students and informed consent for surgery adequately protects patients and give owners choices.
Dostana Ljusic	Repeated comments from Ms. Henkel	Same responses.

Reevyn Aronson	Require owner consent	Same response as Rutherford above.
Donald Goppert	Require owner consent	Same response.
Sharon Custer-Boggess	Same comment	Same response.
Maiiaika Boyd	Same comment	Same response.
Molly Mittens Mom	Suggested language on informed consent and disclosure about students working in a practice.	Board adopted new language on informed consent and disclosure.
Edna Whittier	Same comment as Ms. Henkel	Same responses.
Mr.	Same comment about owner consent	Same response as above.
Keith Richardson	Opposes the action. Owner consent should be required.	Same responses as above.
Pat Petro	Require owner consent	Same response.
Cara Lubarsky, DVM	Supports informed consent. Access to hands-on experience can lead to more highly-trained and competent doctors upon graduation.	Board concurs.
Jmm	There is no circumstance in which a student would be the sole person examining and performing procedures on an animal; every case is overseen by a veterinarian. All clients who bring an animal to Va. Tech sign a form acknowledging that it is a teaching hospital. More experience for students under guidance of experienced professions is beneficial; limiting them to a single year is simply inadequate.	Board concurs and appreciates the information.
Rachel Bunn	Fully supports. Restrictions in place; students are only under direct supervision & may only practice what they have learned. Practicing routine physical exams is a learning process that may begin early in school, but students do not learn surgery until 3 rd year.	Board concurs.
LaCheryl Ball	Practice is essential to growth; practice and repetition with guidance and support is invaluable to any student.	Board concurs.
Treasa Bryant	Practice is essential to nurture our abilities and develop skills under the watchful eye of a licensed professional	Board concurs.
Laura Turner	Essential for students to be able to practice technical skills to better serve clients in the future	Board concurs.
Courtney Scarborough	Practicing skills will minimize the learning curve and make more competent veterinarians after graduation	Board concurs.
Shawn Budge	Supports the amendment. Owner consent already required in subsection B	Board concurs.
Dr. Ruth Hendrick	Concerns about amendment. Not all supervising veterinarians are equally attentive to responsibilities. Less experienced students should only do	The Board appreciates the concern. If a complaint is filed, a supervising veterinarian is held accountable and may be disciplined if a pet is harmed.

	observation and simulation. Will only allow only out-of-state treatment for my pets.	
Jonatan Pribluda, DVM	Supports. Hands-on experience is essential; there is no substitute during veterinary training. New graduates would not be competent if they could not practice technical skills under direct supervision.	Board concurs.
Karen Hicks Flexner, DVM	Supports. Increasing supervised hands-on experience is beneficial to all; essential in mastery of medicine.	Board concurs.
Corinne Graefe	Pet owner needs to be notified for student to practice on pet.	Notification added to proposed regulation.
Bill Graefe	Same as above	Same as above.
Karen Day	Opposed. Owners should know who is treating a pet; if a student is working in the practice, the pet is not receiving treatment from a qualified, licensed veterinarian.	Commenter assumes that the student is acting independently without direct supervision and oversight; the Board does not concur.
Susan Adams	Owner consent must be mandatory; have lost 2 dogs due to inexperience of unsupervised students.	The Board appreciates the concern.
Elizabeth Wall, DVM	Supports; Recommends seeking out hospitals that attract students because they want to learn from good doctors with good equipment and ethics. Doctors who work with students are up-to-date; doctors know what procedures are appropriate at various levels of education.	Board concurs.
Catharine Cowan	Hands-on learning experiences are invaluable; would be a huge improvement in training of future veterinarians. Owners do know when students are working on their animals, and students are always supervised.	Board concurs.
Sara Connell	Owner consent necessary; Practice before the 3 rd year should be observation only. Comment similar to Ms. Henkel.	Same response as above.
Nancy Kelly	Does not support; not clear that Va. Tech has developed sufficient links to excellent clinical training settings.	The Board appreciates the concern, but does not have jurisdiction over the veterinary college.
Virginia Welton	There should be owner consent and a right to decline services performed by students or interns.	Amendments were adopted to address those concerns.
Stephanie Paultre	Supports; current rules limit ability to practice skills; more hands-on experience would be beneficial	Board concurs.
Courtney Walski	Supports; More experience is best way to work towards achieving excellence in practice when you get training and feedback from supervising veterinarians.	Board concurs.
Christine Reid	Supports; Goals of a student based on health and welfare of each future patient.	Board concurs.

	Students will practice skills and use knowledge relevant to their current level of education.	
Marge Beane	Regulations should consider client rights and inform owners about every procedure, not just surgery.	Board did not require informed consent for every treatment and every procedure, but did adopt a disclosure requirement so owners know when there are students in the practice and have the opportunity to discuss their involvement with a pet.
Cassandra Cooper	Don't like the idea of a student working on my cats; owner should have to give permission.	The Board appreciates the comment.
Harry Yeatts	Veterinary students should be working on animals as early as they can; viewing procedures and assisting professionals is best way; should be strictly supervised and owners should know and give consent for student primary involvement.	Board concurs.
Jennifer Hodgson, Associate Dean, VMCVM	Supports earlier supervised experience. Skills training starts in first semester of first year, but models and mannequins cannot replace animals to develop these skills. Change would result in more skillful veterinarians in Va. Supports owner consent before student performs a procedure.	Board concurs.
Cynthia Honeycutt, DVM	More real life experience means better graduates and better care for animals. Wishes she had had more hands-on real world practice under supervision of experienced veterinarians – would have made fewer mistakes as a new graduate	Board concurs.
David Grat, DVM	Supports; change will improve care of animals	Board concurs
Katherine Wilson, DVM	Supports; directly supervised, practical experience with owner consent will benefit patients and the profession	Board concurs
Jim Best	Owner consent is consistent with basic fair business model. Practicing without a license is misleading.	The Board appreciates the comment.
Michael Nappier, DVM	Supports; change will improve veterinary care. Educated in state where all veterinary students were allowed to gain practical experience. Owners come to Va. Tech because they enjoy being a part of the teaching/learning experience.	Board concurs.
Harvey Wingfield	Require owner consent when students are involved. Students don't have sufficient practice to give unsupervised medical diagnosis or do medical procedures.	Students are not allowed to practice unsupervised and are required to have the supervising veterinarian in the operatory during a procedure.
Kevin Britt, DVM	Supports; early hands-on experience valuable	Board concurs.
Laura Edelman	Owner should be told if student is examining a pet; students should be	Amendments for disclosure were adopted; Board does not agree with requirement for

	observing only.	observation only.
Judith Sanders	Require owner consent; students should get their experience at shelters with expert supervision	Shelters do not house all species of animals. Owners will have opportunity to give or withhold consent.
Jackie Davis	Have used the Vet School many times. Should be enforceable standards and students only allowed to do tasks for which they have already received instruction.	Already required in subsection A of section 130.
Dawn Heyse	Owners should have knowledge of and consent to student practice. Veterinarians should be obligated to supervise students closely.	Amendments adopted accordingly.
Daniel Jones	Owner consent should be required. Does not want "uncertified" vets working on animal.	The Board appreciates the comment.
Dani Duran	Same comment about owner consent	The Board appreciates the comment.
Sidney Delson	Need clear consent from owners	Same response
Susan Fredette	Same comment about owner consent; enforceable standards about student practice and enforceable standards about supervising veterinarians.	Amendments and current regulations address the comments.
Susan Bailey	Same comment about consent	Same response.
Susan Puscheck	Same comment about consent; only practice in 4 th year	Same response.
Rebecca Dameron	Owner needs to know whether student is practicing and whether under supervision	Same response.
Jennifer Daly, Ph.D.	Board should develop standards to ensure programs are accredited. As in medicine, students should have to register as trainees; training sites are licensed without even a site visit.	The Board does not oversee the accreditation of programs, but it does not license anyone who has not graduated from an accredited program. <u>Students</u> in medical schools do not register; only post-graduate interns and residents register. In veterinary medicine, there is no requirement for post-graduate work, so graduates from veterinary colleges may be granted a full license. Training sites are veterinary establishments which are overseen and inspected by the Board.
Shawna Klahn, DVM	Supports. Earlier experience = better veterinarians	Board concurs
Rainbow Lonestar	Generally in favor of hands-on experience; same comments as Fredette above	Same response.
Caroline Reznicek	Same comment about informed consent	Same response.
Jonathan Schmerfeld	Board needs to clarify training, require owner consent, and hold incompetent or impaired students, vets and hospitals accountable	Current regulations do address what training is required and do have accountability.
Sophie Conlogue	Same comment about informed consent	Same response.
Preston Boggess, M.D.	Require owner consent; set standards for practice based on education & experience; set standards for	Same response to similar comments.

	veterinarians who supervise.	
J Hornberg	Proposal is disaster in the making	Same response

Family impact

Please assess the impact of this regulatory action on the institution of the family and family stability including to what extent the regulatory action will: 1) strengthen or erode the authority and rights of parents in the education, nurturing, and supervision of their children; 2) encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one's spouse, and one's children and/or elderly parents; 3) strengthen or erode the marital commitment; and 4) increase or decrease disposable family income.

There is no impact on the family.

Detail of changes

Please list all changes that are being proposed and the consequences of the proposed changes; explain the new requirements and what they mean rather than merely quoting the proposed text of the regulation.

Current section number	Current requirement	Proposed change, intent, rationale, and likely impact of proposed requirements
130	Sets out requirements for practical training in a preceptorship or externship	<p>An amendment in subsection A will eliminate the restriction that practical training may only occur in the final year of veterinary college.</p> <p><i>Students, veterinarians, and the veterinary college at Virginia Tech have requested the amendment because it will provide students an opportunity to receive practical, supervised training throughout the curriculum. Students working as preceptees are only allowed to perform those tasks or procedures for which they have been specifically trained and for which they are supervised. Preceptors remain responsible for the care and well-being of the animal. For example, students learn to take histories in the beginning and progress to performance of surgery in their final year. As soon as students graduate from the college, they are eligible for full licensure as veterinarians. Practical experience gained throughout their education will ultimately benefit them and their patients. Additionally, the Board was told that the college is revamping and updating the curriculum to incorporate more experiential learning, so this amendment is strongly supported by the college.</i></p> <p>An amendment to subsection B will require that whenever a preceptee or extern is performing surgery, either assisted or unassisted, the supervising veterinarian must be in the</p>

		<p>operatory.</p> <p><i>The amendment is consistent with best practices for supervising a preceptee and is incorporated into regulation for protection of animals and assurance for owners.</i></p> <p>A new subsection C is proposed to require a supervising veterinarian to inform owners that he or she has a preceptee in the practice. Such information can be provided by signage or by inclusion in an informed consent form.</p> <p><i>The purpose of the amendment is to respond to owners who want to know who is working on their animals. Veterinarians would then have the opportunity to explain the role of the preceptee, and the owner would have the option of choosing who is involved in the care of their animal.</i></p> <p>Subsection D is added to explicitly state that the veterinarian or veterinary technician who supervises a preceptee or extern remains responsible for the care and treatment of the patient.</p> <p><i>The provision is not a new standard; supervisors have always been held accountable for the care and treatment of the animal, but the specificity of the regulation is for emphasis and clarity.</i></p>
<p>NEW 173</p>	<p>Sets out provisions for informed consent for surgery</p>	<p>Subsection A specifies the general content of informed consent, including the risks, benefits and alternatives of the recommended surgery. It requires that the consent be obtained and documented in the patient record. It does not require written consent, but does require that the veterinarian explain the surgery in a manner that a reasonably prudent practitioner would tell an owner.</p> <p><i>The provision in subsection A is similar to requirements of the Board of Medicine for its practitioners. The expectation for informed consent is that an owner will have prior knowledge about what the surgery involves and the possible risks associated with it. The “reasonably prudent” language is included because there is not an expectation that a veterinarian explain the surgery in medical terms that only another practitioner would understand.</i></p> <p>Subsection B specifies that an exception for the informed consent may be made in an emergency situation when a</p>

		<p>delay would likely result in harm to the patient.</p> <p><i>Again, the language is taken from Medicine regulation and is necessary to protect patients and veterinarians in such situations.</i></p> <p>Subsection C specifies that if a veterinary student is to perform surgery, the informed consent must so state.</p> <p><i>The provision is included to assure consumers that they will be informed prior to a surgery if a student or preceptee is to perform the procedure.</i></p>
--	--	--