

May 19, 2026
Board Room 1
8:30 a.m.

Agenda
Virginia Board of Veterinary Medicine
Regulatory Committee Meeting

Call to Order – Jeffrey Newman, DVM, Chair

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- Welcome
- Emergency Egress Procedures

Ordering of Agenda – Dr. Newman

Public Comment – Dr. Newman

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.

Discussion – Erin Barrett / Kelli Moss

Pages 2 – 16

- Review of draft guidance documents:
 - 150-1 Veterinarian-in-Charge **(pp 2-5)**
 - 150-12 Administration of Rabies Vaccines revisions **(pp 6-11)**
 - 150-16 Loss or Theft of Drugs revisions **(pp 12-16)**

Next Steps – Ms. Barrett/Ms. Moss

Meeting Adjournment – Dr. Newman

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

Veterinarian-in-Charge (VIC)

Section [18VAC150-20-181](#) of the Regulations Governing the Practice of Veterinary Medicine sets forth the requirements for veterinarian-in-charge. That section forms the basis of the information contained in this Guidance Document.

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

- The VIC is 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, including for maintaining security of controlled drugs.
- The VIC notifies the board if the establishment closes.
- The VIC notifies the board when no longer acting as VIC.

2. Is the VIC required to practice at the establishment? Can a veterinarian register as the VIC for more than one establishment?

The regulations are silent as to if or where the VIC practices, or how many establishments a VIC can oversee. However, the VIC needs to maintain a current, active license in Virginia and be on site at each establishment as often as is necessary to provide routine oversight and ensure regulatory compliance.

3. What types of establishments require a VIC?

Per [18VAC150-20-180](#), every veterinary establishment must be registered with the board and must register a VIC with the Board to operate. Regardless of who owns a veterinary establishment, veterinary medicine may only be practiced out of a registered establishment except in emergency situations. Ownership of the practice is not affected by this requirement, so corporate owned or non-veterinarian owned practices must have a VIC. A single practitioner must practice out of a registered establishment with a VIC, whether out of a brick-and-mortar (stationary) establishment or traveling to the patient in a house/farm call (ambulatory).

4. What are the responsibilities of the VIC?

The VIC should be familiar with all current 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.

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 frequently or for how many hours a VIC must be on site at the establishment. However, the regulations do state that the VIC is responsible for “regularly being on site as necessary to provide routine oversight” for patient safety and compliance with law and regulation. 18VAC150-20-181(A)(1). If an inspection or investigation of a complaint identifies deficiencies or violations relating to a VIC’s responsibility, the board may take disciplinary action 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 the establishment to review controlled substances, patient records, Schedule II through V invoices, Schedule II through V drug logs, and biennial inventories; therefore, the VIC should ensure that these are available.

The following veterinary establishment [forms](#) and [guidance documents](#) may be helpful. The drug distribution log and biennial inventory forms were developed by the board as a resource and sample forms are available for reference. The board does not require the use of these forms.

- Veterinary Establishment Inspection Report
- Distribution Drug Log
- Biennial Inventory Form
- 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 is responsible for ensuring the establishment complies with laws and regulations, and this includes federal and state drug laws and regulations. The VIC is responsible for performing the biennial inventory. While the VIC may delegate the performance of the biennial inventory to another licensee, the VIC remains responsible for signing the biennial inventory and for ensuring that it includes all required components. In the event of an unexplained drug loss or theft of Schedule 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 (Schedule II through VI) in Veterinary Practice
- 150-16 Protocol to follow upon discovery of a loss or theft of drugs

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 the Practitioner Resources tab on the Board's website.

- The VIC must ensure that patient records are available to owners/clients as outlined in Virginia Code § 54.1-2405.
- Patient records must be maintained for three years following the last office visit or discharge of the patient from the establishment. [18VAC1502-195\(B\)](#)
- The VIC must ensure that all Schedule II through VI drugs have been properly disposed. [18VAC150-20-190\(E\)](#)
 - Schedule 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 Schedule 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, please contact the Drug Enforcement Administration (<https://www.deadiversion.usdoj.gov/>).

9. How is a change in VIC made?

Outgoing VIC responsibilities: A licensee who is no longer acting as the VIC of an establishment must immediately provide written notification to the Board. An outgoing VIC Form is available on the Board's [website](#). The outgoing 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 outgoing VIC must 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. The outgoing VIC is responsible for Returning the previous establishment registration to the board within five days following the date of the change.

Incoming VIC responsibilities: The establishment must register a new VIC to operate. Therefore, an application for a new registration, with the new VIC's name must be submitted five days prior to the change providing the effective date of the change. An incoming VIC Form can found on the Board's website under [Forms](#). An establishment can also update its VIC online. Instructions for completing the online process are available on the Board's [website](#). Prior to the opening of business on the date of the VIC change, perform (or oversee), date and sign an inventory of every Schedule 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.

10. 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, the Board may take action against the VIC, as well as any other licensee who allowed the unlicensed person to perform acts restricted to a licensee.

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 business practices if he is not the owner of the establishment?

The Board does not regulate ownership of veterinary establishments, nor does it regulate fees charged for services provided. The VIC is responsible for maintaining the establishment’s compliance with all laws and regulations, including any related to business practices under the purview of the board, regardless of the ownership of the establishment.

References:

[18VAC150-20-130](#)

[18VAC150-20-140](#)

[18VAC150-20-180](#)

[18VAC150-20-181](#)

[18VAC150-20-195\(B\)](#)

[Virginia Code § 54.1-2405](#)

[Guidance Documents](#)

VIRGINIA BOARD OF VETERINARY MEDICINE**Administration of Rabies ~~Vaccinations~~ Vaccines****Q: Who is authorized to administer a rabies ~~vaccination~~ vaccine?**

A: Pursuant to Virginia Code § 3.2-6521, a rabies ~~vaccination~~ vaccine is to be administered by a *licensed* veterinarian or *licensed* veterinary technician who is under the immediate and direct supervision of a licensed veterinarian on the premises.

Code of Virginia—Comprehensive Animal Care

~~§ 3.2-6521. Rabies inoculation of companion animals; availability of certificate; rabies clinics. A. The owner or custodian of all dogs and cats four months of age and older shall have such animal currently vaccinated for rabies by a licensed veterinarian or licensed veterinary technician who is under the immediate and direct supervision of a licensed veterinarian on the premises unless otherwise provided by regulations. The supervising veterinarian on the premises shall provide the owner or custodian of the dog or the cat with a rabies vaccination certificate or herd rabies vaccination certificate and shall keep a copy in his own files. The owner or custodian of the dog or the cat shall furnish within a reasonable period of time, upon the request of an animal control officer, humane investigator, law enforcement officer, State Veterinarian's representative, or official of the Department of Health, the certificate of vaccination for such dog or cat. The vaccine used shall be licensed by the U.S. Department of Agriculture for use in that species. At the discretion of the local health director, a medical record from a licensed veterinary establishment reflecting a currently vaccinated status may serve as proof of vaccination.~~

Q: Where may rabies vaccination clinics occur?

A: Pursuant to 18VAC150-20-180 of the *Regulations Governing the Practice of Veterinary Medicine*, veterinary medicine may only be practiced out of a registered veterinary establishment except in emergency situations, ~~as provided in 18VAC150-20-171~~. Rabies vaccination clinics may be offered outside of a registered veterinary establishment only if all the requirements found in Va. Code § 3.2-6521 ~~of the Code of Virginia~~ are met, which includes approval by the appropriate local health department and governing body.

A vaccine clinic may also be held at a registered stationary veterinary establishment without local health department approval. A veterinarian who holds an ambulatory veterinary establishment registration may participate in a health department-sponsored rabies vaccination clinic or in a vaccination clinic held at a registered stationary establishment. A “pop-up” rabies clinic held at an unregistered location is only permitted with prior approval from the local health department.

Regulations Governing the Practice of Veterinary Medicine

~~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 18 VAC 150-20-171. The injection of a microchip for identification purposes shall only be performed in a veterinary establishment, except personnel of animal shelters or pounds may inject animals while in their possession.~~

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

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

~~**Code of Virginia—Comprehensive Animal Care**~~

~~**§ 3.2-6521. Rabies inoculation of companion animals; availability of certificate; rabies clinics.**~~

~~B. All rabies clinics require the approval by the appropriate local health department and governing body... However, the county or city shall ensure that a clinic is conducted to serve its jurisdiction at least once every two years.~~

Q: What are the recordkeeping requirements for rabies vaccinations vaccines administered in a registered veterinary establishment?

A: The recordkeeping requirements for patients seen receiving rabies vaccinations administered in a registered veterinary establishment are found under 18VAC150-20-195 of the Regulations.

~~**Regulations Governing the Practice of Veterinary Medicine**~~

~~**18VAC150-20-195. Recordkeeping.**~~

~~A. A 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.~~

Q: What are the recordkeeping requirements for rabies ~~vaccinations~~ vaccines administered in a rabies clinic approved by the appropriate health department and governing body?

A: Va. Code § 3.2-6521 requires the licensed veterinarian who administers or oversees rabies vaccinations at the clinic to provide the owner or custodian a rabies vaccination certificate for each vaccinated animal and ensure that a registered veterinary establishment retains a copy of the rabies vaccination certificate.

As of July 1, 2024, this law expanded to allow rabies vaccination clinics approved by the appropriate local health department and governing body to offer microchipping and additional animal health vaccines at the discretion of the licensed veterinarian or veterinarians participating in the clinic. It requires the licensed veterinarian who administers or oversees vaccinations to provide the owner or custodian of an animal a vaccination record for each vaccinated animal and ensure that a licensed veterinary establishment retains a copy of each vaccination record.

Code of Virginia—Comprehensive Animal Care

~~§ 3.2-6521. Rabies inoculation of companion animals; availability of certificate; rabies clinics. B. ...The licensed veterinarian who administers rabies vaccinations at the clinic shall (i) provide the owner or custodian a rabies vaccination certificate for each vaccinated animal and (ii) ensure that a licensed veterinary facility retains a copy of the rabies vaccination certificate. The sponsoring organization of a rabies clinic shall, upon the request of the owner or custodian, an animal control officer, a humane investigator, a law enforcement officer, a State Veterinarian's representative, a licensed veterinarian, or an official of the Department of Health, provide the name and contact information of the licensed veterinary facility where a copy of the rabies vaccination certificate is retained...~~

~~§ 3.2-6529. Veterinarians to provide treasurer with rabies certificate information; civil penalty. A. Each veterinarian who vaccinates a dog against rabies or directs a veterinary technician in his employ to vaccinate a dog against rabies shall provide the owner a copy of the rabies vaccination certificate. The veterinarian shall forward within 45 days a copy of the rabies vaccination certificate or the relevant information contained in such certificate to the treasurer of the locality where the vaccination occurs.~~

~~The rabies vaccination certificate shall include at a minimum the signature of the veterinarian, the animal owner's name and address, the species of the animal, the sex, the age, the color, the primary breed, whether or not the animal is spayed or neutered, the vaccination number, and expiration date. The rabies vaccination certificate shall indicate the locality where the animal resides.~~

~~Any veterinarian that willfully fails to provide the treasurer of any locality with a copy of the rabies vaccination certificate or the information contained in such certificate may be subject to a civil penalty not to exceed \$10 per certificate. Monies raised pursuant to this subsection shall be~~

placed in the locality's general fund for the purpose of animal control activities including spay or neuter programs.

Q: What examination is required to administer a rabies or other vaccines?

A: The veterinarian is responsible for determining whether the animal is healthy enough to be vaccinated. The board's regulations do not specify required elements of an examination; only that physical examination findings must be documented in the patient record. 18VAC150-20-195

Q: Can an unlicensed assistant administer vaccines other than rabies and inject microchips?

A: A licensed veterinarian may delegate the administration (including by injection) of Schedule VI drugs to a properly trained assistant under his immediate supervision. The veterinarian has the responsibility to determine the assistant has had adequate training to safely administer the drug in the manner prescribed and remains responsible for the duties being delegated and for the health and safety of the animal. 18VAC150-20-172.

Q: Are there additional requirements now that other vaccines and microchipping may be administered at VDH rabies clinics?

A: Veterinarians should ensure owners or custodians are provided with appropriate follow-up instructions including timeframes for vaccine boosters as needed and information to register microchips.

Q: Who should be contacted for questions about rabies vaccination clinics that held in the community?

A: For more information contact your local health department at <http://www.vdh.virginia.gov/LHD/index.htm>.

VIRGINIA BOARD OF VETERINARY MEDICINE**Administration of Rabies Vaccines****Q: Who is authorized to administer a rabies vaccine?**

A: Pursuant to Virginia Code § [3.2-6521](#), a rabies vaccine is to be administered by a *licensed* veterinarian or *licensed* veterinary technician who is under the immediate and direct supervision of a licensed veterinarian on the premises.

Q: Where may rabies vaccination clinics occur?

A: Pursuant to [18VAC150-20-180](#) of the *Regulations Governing the Practice of Veterinary Medicine*, veterinary medicine may only be practiced out of a registered veterinary establishment except in emergency situations. Rabies vaccination clinics may be offered outside of a registered veterinary establishment only if all the requirements found in Va. Code § [3.2-6521](#) are met, which includes approval by the appropriate local health department and governing body. A vaccine clinic may also be held at a registered stationary veterinary establishment without local health department approval. A veterinarian who holds an ambulatory veterinary establishment registration may participate in a health department-sponsored rabies vaccination clinic or in a vaccination clinic held at a registered stationary establishment. A “pop-up” rabies clinic held at an unregistered location is only permitted with prior approval from the local health department.

Q: What are the recordkeeping requirements for rabies vaccines administered in a registered veterinary establishment?

A: The recordkeeping requirements for patients seen in a registered veterinary establishment are found under [18VAC150-20-195](#) of the Regulations.

Q: What are the recordkeeping requirements for rabies vaccines administered in a rabies clinic approved by the appropriate health department and governing body?

A: Va. Code § [3.2-6521](#) requires the licensed veterinarian who administers or oversees rabies vaccinations at the clinic to provide the owner or custodian a rabies vaccination certificate for each vaccinated animal and ensure that a registered veterinary establishment retains a copy of the rabies vaccination certificate.

As of July 1, 2024, this law expanded to allow rabies vaccination clinics approved by the appropriate local health department and governing body to offer microchipping and additional animal health vaccines at the discretion of the licensed veterinarian or veterinarians participating in the clinic. It requires the licensed veterinarian who administers or oversees vaccinations to provide the owner or custodian of an animal a vaccination record for each vaccinated animal and ensure that a licensed veterinary establishment retains a copy of each vaccination record.

Q: What examination is required to administer a rabies or other vaccines?

A: The veterinarian is responsible for determining whether the animal is healthy enough to be vaccinated. The board's regulations do not specify required elements of an examination; only that physical examination findings must be documented in the patient record. [18VAC150-20-195](#)

Q: Can an unlicensed assistant administer vaccines other than rabies and inject microchips?

A: A licensed veterinarian may delegate the administration (including by injection) of Schedule VI drugs to a properly trained assistant under his immediate supervision. The veterinarian has the responsibility to determine the assistant has had adequate training to safely administer the drug in the manner prescribed and remains responsible for the duties being delegated and for the health and safety of the animal. 18VAC150-20-172.

Q: Are there additional requirements now that other vaccines and microchipping may be administered at VDH rabies clinics?

A: Veterinarians should ensure owners or custodians are provided with appropriate follow-up instructions including timeframes for vaccine boosters as needed and information to register microchips.

Q: Who should be contacted for questions about rabies vaccination clinics that held in the community?

A: For more information contact your local health department at <http://www.vdh.virginia.gov/LHD/index.htm>.

Guidance document: 150 -16

~~Adopted November 9, 2005~~

~~Revised: October 25, 2017~~

~~Reaffirmed: March 11, 2021~~

VIRGINIA BOARD OF VETERINARY MEDICINE

~~Protocol to follow upon discovery of a loss or theft of drugs~~ ~~Reporting Drug Loss: Schedules II through V and Schedule VI Drugs~~

~~Guidance:~~

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

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

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

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

~~Reference~~

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

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

Guidance document: 150 -16

~~Adopted November 9, 2005~~

~~Revised: October 25, 2017~~

~~Reaffirmed: March 11, 2021~~

SCHEDULE II-V DRUGS

1. Who is responsible for reporting drug loss?

The Veterinarian-In-Charge (VIC), or in his absence, his designee shall immediately report a theft or loss. The designee could be a non-licensed person, however, only a licensee (veterinarian or LVT) can access Schedule II through V controlled substances.

2. What if the VIC is not the DEA registrant for the schedule II through V drugs?

In some cases, multiple DEA registrants may purchase Schedule II through V drugs for delivery to the same address (i.e., the same practice or veterinary establishment). Both the VIC and the DEA registrant from whom drugs are lost, should participate in the reporting.

3. What constitutes drug loss?

Drug loss can occur through a variety of means including diversion, theft, contamination, spillage, misplacement, accidental discard or destruction, or non-delivery of expected shipment.

4. Must loss through theft always be reported?

Yes, if theft is confirmed or just suspected, it should be reported.

5. Must loss through usage always be reported?

Unusual loss is required to be reported. Usual loss or expected loss through normal use is not required to be reported. For example, expected hub loss for injectable medications does not require reporting.

6. Is tracking or reconciliation of hub loss of injectables required?

There is no Virginia law or regulation requiring tracking or reconciliation of hub loss. The board's regulation refers to unusual loss.

7. Should a complete inventory of all Schedule II through V drugs be made upon the discovery of theft or loss of a single controlled substance?

If the VIC is unable to determine the exact kind and quantity of the drug loss, he shall immediately make a complete inventory of all Schedules II through V drugs. It is always prudent to make a complete inventory. This inventory may serve as a biennial inventory if all the requirements of 18VAC150-20-190(J) for the biennial inventory are met.

8. To whom shall the loss be reported?

The loss must be reported to each and all the following entities:

- a. Virginia Board of Veterinary Medicine, in writing via email, FAX or postal carrier
- b. Virginia Board of Pharmacy, in writing, via email, FAX or postal carrier

Guidance document: 150 -16

~~Adopted November 9, 2005~~

~~Revised: October 25, 2017~~

~~Reaffirmed: March 11, 2021~~

c. United States Drug Enforcement Administration (DEA) in accordance with 21 C.F.R. 1301.76(b).

9. How quickly must reporting occur?

The regulations require IMMEDIATE reporting. However, the reporting is written and can be submitted electronically or by regular mail. The Code of Federal Regulations (CFR) requires notification to the DEA Field Division Office and filing DEA Form 106 within specific timeframes.

10. What information should be included in the loss report?

There is no required form to report a loss to the Board of Veterinary Medicine and Board of Pharmacy. A copy of the DEA Form 106 may be utilized and any additional explanation or corrective action taken is useful.

11. Am I required to contact local law enforcement?

The Board of Veterinary Medicine recommends contacting local law enforcement and the DEA Form 106 includes a question regarding whether law enforcement was contacted.

12. What will happen after I report a loss?

The Boards of Veterinary Medicine and Pharmacy will confirm receipt of your report. Additional information may be requested, or an investigation may be conducted if warranted.

SCHEDULE VI (NON-DEA SCHEDULED PRESCRIPTION DRUGS)

Am I required to report unusual loss or theft of schedule VI drugs to DEA or the Boards of Veterinary Medicine and Pharmacy?

No. DEA does not regulate Schedule VI substances; therefore, no reporting is required. The Commonwealth of Virginia, Board of Veterinary Medicine and Board of Pharmacy regulate Schedule VI drugs. There is no requirement for reporting unusual loss or theft of Schedule VI substances. It should be noted that the VIC is responsible for maintaining the facility within the standards set forth in regulation, including drug storage, dispensing, destruction and records.

Reference

18VAC150-20-190

CFR 1301.76(b)

Va. Code Ch. 34. Drug Control Act

VIRGINIA BOARD OF VETERINARY MEDICINE

Reporting Drug Loss: Schedules II through V and Schedule VI Drugs

SCHEDULE II-V DRUGS

1. Who is responsible for reporting drug loss?

The Veterinarian-In-Charge (VIC), or in his absence, his designee shall immediately report a theft or loss. The designee could be a non-licensed person, however, only a licensee (veterinarian or LVT) can access Schedule II through V controlled substances.

2. What if the VIC is not the DEA registrant for the schedule II through V drugs?

In some cases, multiple DEA registrants may purchase Schedule II through V drugs for delivery to the same address (i.e., the same practice or veterinary establishment). Both the VIC and the DEA registrant from whom drugs are lost, should participate in the reporting.

3. What constitutes drug loss?

Drug loss can occur through a variety of means including diversion, theft, contamination, spillage, misplacement, accidental discard or destruction, or non-delivery of expected shipment.

4. Must loss through theft always be reported?

Yes, if theft is confirmed or just suspected, it should be reported.

5. Must loss through usage always be reported?

Unusual loss is required to be reported. Usual loss or expected loss through normal use is not required to be reported. For example, expected hub loss for injectable medications does not require reporting.

6. Is tracking or reconciliation of hub loss of injectables required?

There is no Virginia law or regulation requiring tracking or reconciliation of hub loss. The board's regulation refers to unusual loss.

7. Should a complete inventory of all Schedule II through V drugs be made upon the discovery of theft or loss of a single controlled substance?

If the VIC is unable to determine the exact kind and quantity of the drug loss, he shall immediately make a complete inventory of all Schedules II through V drugs. It is always prudent to make a complete inventory. This inventory may serve as a biennial inventory if all the requirements of 18VAC150-20-190(J) for the biennial inventory are met.

8. To whom shall the loss be reported?

The loss must be reported to each and all the following entities:

- a. Virginia Board of Veterinary Medicine, in writing via email, FAX or postal carrier

- b. Virginia Board of Pharmacy, in writing, via email, FAX or postal carrier
- c. United States Drug Enforcement Administration (DEA) in accordance with 21 C.F.R. 1301.76(b).

9. How quickly must reporting occur?

The regulations require IMMEDIATE reporting. However, the reporting is written and can be submitted electronically or by regular mail. The Code of Federal Regulations (CFR) requires notification to the DEA Field Division Office and filing DEA Form 106 within specific timeframes.

10. What information should be included in the loss report?

There is no required form to report a loss to the Board of Veterinary Medicine and Board of Pharmacy. A copy of the DEA Form 106 may be utilized and any additional explanation or corrective action taken is useful.

11. Am I required to contact local law enforcement?

The Board of Veterinary Medicine recommends contacting local law enforcement and the DEA Form 106 includes a question regarding whether law enforcement was contacted.

12. What will happen after I report a loss?

The Boards of Veterinary Medicine and Pharmacy will confirm receipt of your report. Additional information may be requested, or an investigation may be conducted if warranted.

SCHEDULE VI (NON-DEA SCHEDULED PRESCRIPTION DRUGS)

Am I required to report unusual loss or theft of schedule VI drugs to DEA or the Boards of Veterinary Medicine and Pharmacy?

No. DEA does not regulate Schedule VI substances; therefore, no reporting is required. The Commonwealth of Virginia, Board of Veterinary Medicine and Board of Pharmacy regulate Schedule VI drugs. There is no requirement for reporting unusual loss or theft of Schedule VI substances. It should be noted that the VIC is responsible for maintaining the facility within the standards set forth in regulation, including drug storage, dispensing, destruction and records.

Reference

[18VAC150-20-190](#)

[CFR 1301.76\(b\)](#)

[Va. Code Ch. 34. Drug Control Act](#)