

June 24, 2026
Training Room 2
10:00 a.m.

Agenda
Virginia Board of Veterinary Medicine
Regulatory Advisory Panel Meeting

Call to Order – Bruce Bowman, DVM, Chair

- Welcome
- Emergency Egress Procedures

Ordering of Agenda – Dr. Bowman

Public Comment – Dr. Bowman

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. Bowman

Pages 1-4

- February 3, 2026 RAP Haul-In Establishment Meeting (**pp 1**)
- March 19, 2026 RAP Haul-In Establishment Meeting (**pp 3**)

Discussion – Erin Barrett/ Kelli Moss

Pages 5-33

- NOIRA Public Comments (**pp 5**)
- Haul in usage other states (**p 24**)
- RAP-amended draft haul in regulations (**pp 25**)
- Alternative options for haul in regulations

Next Steps – Ms. Barrett/Ms. Moss

Meeting Adjournment – Dr. Bowman

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

Call to Order

The Regulatory Advisory Panel (Panel) meeting of the Virginia Board of Veterinary Medicine (Board) was called to order on February 3, 2026, at 10:01 a.m. at the Department of Health Professions (DHP), Perimeter Center, 9960 Mayland Drive, 2nd Floor, Training Room 5, Henrico, Virginia 23233.

Chair

Bruce M. Bowman, DVM, Board member

Attendees

Thomas Massie, Jr., DVM, Large animal veterinarian

Melinda McCall, DVM, Large animal veterinarian

Matt Nuckols on behalf of Jake Tabor, Legislative Specialist, Governmental Relations, Virginia Farm Bureau

Staff Present

Kelli Moss, Executive Director

Claire Foley, Deputy Executive Director

Matt Novak, DHP Regulatory Coordinator

Laura L. Jackson, Board Administrator

Charles "Chip" Atkins, Licensing Specialist

Establishment of Quorum

With four out of four Panel members present, a quorum was established.

Introduction

Dr. Bowman welcomed attendees and introductions followed.

Ordering of Agenda

Dr. Bowman opened the floor to any edits or corrections regarding the agenda. Hearing none, the agenda was accepted as presented.

Public Comment

No public comment was provided.

Discussion

Ms. Moss reviewed the 2025 Large Animal Veterinarian Shortage Study Report, which included the work group's recommendation to develop a regulatory framework for haul in veterinary establishments. She provided historical information regarding the Board's recognition of and ongoing efforts to create a registration pathway for this type of establishment to allow greater access to veterinary care for large animals. She affirmed this Panel's purpose to draft proposed regulations for haul-in veterinary establishments to recommend to the Board.

Mr. Novak stated that a Notice of Intended Regulatory Action is pending publication and the next step in the regulatory process will be to develop proposed regulations for haul in establishments that will allow for a registered and inspected shared or third-location facility as there is currently no regulatory provision for this. He projected the Panel would provide its recommendation of the proposed regulations no earlier than the Board meeting scheduled in July 2026.

The Panel discussed the minimum standards to consider for this new establishment type, including definitions, prerequisites and VIC requirements for a haul in establishment.

Next Steps

The Panel will reconvene in late March at a date and time to be determined to review a draft of the proposed regulations developed from the information gathered at the meeting.

Adjournment

With no objection, Dr. Bowman adjourned the meeting at 11:55 a.m.

Kelli Moss
Executive Director

Call to Order

The Regulatory Advisory Panel (Panel) meeting of the Virginia Board of Veterinary Medicine (Board) was called to order on March 19, 2026, at 10:04 a.m. at the Department of Health Professions (DHP), Perimeter Center, 9960 Mayland Drive, 2nd Floor, Training Room 1, Henrico, Virginia 23233.

Chair

Bruce M. Bowman, DVM, Board member

Attendees

Thomas Massie, Jr., DVM, Large animal veterinarian

Jake Tabor, Legislative Specialist, Governmental Relations, Virginia Farm Bureau

Member Attending Virtually

Melinda McCall, DVM, Large animal veterinarian (left during discussion)

Staff Present

Kelli Moss, Executive Director

Claire Foley, Deputy Executive Director

M. Brent Saunders, Senior Assistant Attorney General, Board Counsel

Matt Novak, DHP Regulatory Coordinator

Laura D. Paasch, Senior Licensing & Operations Specialist

Charles "Chip" Atkins, Licensing Specialist

Introduction

Dr. Bowman welcomed attendees and introductions followed.

Ordering of Agenda

Dr. Bowman opened the floor to any edits or corrections regarding the agenda. Hearing none, the agenda was accepted as presented.

Public Comment

No public comment was provided.

Discussion

Mr. Novak presented proposed regulations and fees for haul-in facilities. The Panel discussed

and made changes to the proposed regulations to accommodate multiple utilization options for large animal veterinary medicine. During this discussion, Dr. McCall was called away to attend to a patient and was not present for the remainder of meeting. At the conclusion of the discussion, the Panel agreed no additional Panel meetings were necessary to make a recommendation to the board.

- A **MOTION** was made by Mr. Tabor to recommend to the board the proposed regulatory language for haul-in facilities as amended by the Panel. The motion was seconded by Dr. Massie and carried unanimously.

Next Steps

Mr. Novak explained the Panel's recommendation will be presented to the Board at its next meeting and provided next steps for the regulatory process.

Adjournment

With no objection, Dr. Bowman adjourned the meeting at 11:53 a.m.

Kelli G. Moss
Executive Director



Agency

Department of Health Professions

Board

Board of Veterinary Medicine

Chapter

Regulations Governing the Practice of Veterinary Medicine [18 VAC 150 - 20]

Action	Regulation of haul-in facilities
Stage	NOIRA
Comment Period	Ended on 4/8/2026

46 comments

All comments for this forum

[Back to List of Comments](#)

Commenter: Anonymous

3/30/26 5:10 pm

Unnecessary regulatory burden

Virginia faces an acknowledged shortage of food animal veterinarians. The operation of a haul in facility allows veterinarians to see more patients in a day. Increasing the regulation of haul in facilities will decrease the availability of food animal veterinarians as they will cease to operate or restrict the operations of these facilities. Increasing the regulation of these facilities will also increase the cost to producers as veterinarians will need to make whatever investments are necessary to comply with the regulations.

CommentID: 240392

Commenter: Anonymous

3/31/26 7:39 am

Regulatory costs are paid by farmers.

Regulatory changes will cost food Animal veterinarians money and time. Both of these costs will be directly passed on to agricultural producers. Unless there has been a pattern of complaints or some substantial problem that needs to be specifically addressed these regulations are unnecessary.

CommentID: 240393

Commenter: Jennifer Ligon, Virginia Cooperative Extension

3/31/26 9:09 am

Unnecessary regulation will impede vital access to large animal Veterinarians and their services

Large animal veterinarians are increasingly difficult to find, yet they play a critical role in supporting local producers. I work closely with many veterinarians to help facilitate producer access. These professionals already operate within a highly regulated environment and work tirelessly to remain available to producers. They have the responsibility for issuing animal health certificates and the ability to conduct visual assessments of animal health.

Imposing additional regulations on this profession would not improve access to veterinary services. Instead, it would increase costs for both producers and veterinarians while creating further administrative and logistical barriers for practitioners who are already stretched thin. Such measures would hinder, rather than enhance, veterinary access and ultimately undermine livestock health efforts in Virginia. Faced with additional paperwork, time demands, and expenses, many veterinarians may choose to discontinue haul?in services altogether—defeating the very purpose of making these services more accessible.

CommentID: 240394

Commenter: Anonymous

3/31/26 9:36 am

Regulation of Haul In Facilities

It is an unnecessary regulatory burden and the costs will be paid by the farmers.

CommentID: 240395

Commenter: Anonymous

3/31/26 1:52 pm

Food Animal Haul in Regulations

As a large animal ambulatory veterinarian, we have been told for decades to make clients come to us so that we can see more clients in a day without all the travel time. The small ruminant clients have been especially receptive to this because it saves them a trip charge and the patients are small enough to travel in a car. Having the ability to do this increases the amount of patients we can see in a day dramatically. In our area, there is an extreme shortage of veterinarians willing to do anything large animal related. If we have to drive to every call the number of clients we see in a day will be cut in half or worse. In the past 5 years more large animal veterinarians have left the area, creating a huge practice radius that we are now responsible for. Most clients with emergencies that can be hauled safely will transport to us because it saves them wait time and the animal gets seen quicker. There is no difference in pulling blood for EIA testing or floating teeth or suturing a laceration on the farm or at the clinic. It is still considered an ambulatory procedure no matter where its done. Laying a horse down for routine castration on the farm or in the yard again does not matter where its completed. Trying to maintain a catheter on the farm for a calf with diarrhea is very difficult for the owners to do, maintaining a catheter in a haul in facility allows trained staff and veterinarians to treat the animal appropriately with the correct amount of fluids. Working cattle in a chute with an alley way and tub makes a huge difference than trying to do it on a farm with 2 gates and a wooden head gate. The clients appreciate the time and money it saves them to be able to bring it to a maintained facility for veterinarians to complete castrations, dehorning, pregnancy checks, prolapses and routine vaccinations as well as the massive amount of cattle foot work that is required to keep our clients herds healthy.

CommentID: 240396

Commenter: Anonymous

3/31/26 6:10 pm

Large animal Veterinary haul in facility benefits

There is certainly a shortage for Large Animal veterinarians at this point. Having the ability to do procedures at a haul in facility have many benefits for animals, clients, and veterinarians and veterinary staff. Generally, many of the veterinary haul in facilities are much better equipped to provide surgical procedures in a much more controlled environment. The better handling equipment also makes it much safer for veterinarians and staff to properly and safely handle the animals. Many times on the farm the clients are allowed to restrain large animals. This also puts the general public at an increased risk for injury. Generally, at haul in facilities, adequate staffing is available for restraint. The general public also benefits from decreased cost and decreased waiting time due to haul in facilities. In conclusion, I feel that it is safer for the animals, clients, and veterinary staff at haul in facilities versus performing procedures on the farm due to the ability to control the environmental factors involved in properly and safely providing veterinary services to the public. Veterinarians can provide the highest level of care possible at haul in facilities.

CommentID: **240397****Commenter:** A Concerned Farmer

3/31/26 6:39 pm

Farmers need haul in facilities

Veterinarians are in such short supply. Why would add more hoops and regulations to haul in facilities when they provide such a needed resource! Many farmers don't have livestock handling facilities. Haul in clinics provide a safe working environment with humane handling conditions that improve overall welfare. If more regulations make it harder for haul in facilities to stay in business, or for new businesses to open, you are hurting the farmer. In areas where vets are in such short supply, immediate assistance would be even harder to obtain when they have to drive up to a hundred plus miles while the animals are suffering and dying instead of farmers being able to meet at the clinic and saving time and their livelihoods life. Please consider with some rationality that farmers need access to haul in facilities. We don't need higher costs, less vets and more stress.

CommentID: **240398****Commenter:** Anonymous

3/31/26 6:51 pm

Haul in facility

As we all know , there is a great shortage of large animal veterinarians. It is very important and imperative to save time as they work extremely long hours. They have to have the time saving element of haul in facilities. In our rural area the vets would spend all day traveling around. The haul in option is the only way for vets to survive.

CommentID: **240399****Commenter:** Anonymous

3/31/26 7:10 pm

Regulations?

The increased regulations of haul in facilities utilized by large animal veterinarians may sound helpful so those who are not actually providing the services, but as a practicing veterinarian who is asked to risk my life on a semi regular basis by trying to perform services in on farm facilities that have not been maintained I personally see these increased regulations as one more way to restrict access to large animal veterinary care. Having access to a haul in facility that is professionally maintained provides a massive benefit to clients accessing veterinary care. On average during the busy season It is not uncommon to for us to work 12-15 hour days and some of that time is spent behind the wheel. By having a easily accessible location clients that have patients that need to be seen can have the option to haul to us instead of waiting hours for someone to be available within the needed area. It's also very difficult to maintain IV catheters for patients that require IV fluids on the farm and much better care can be provided by having those patients located at the clinic for duration of treatment. Alot of clients that do have their own facilities may have build these facilities by hand and not all procedures can safely be done in a homemade wooden headgate- think BSE'S, Hoof trimming, C sections. There are so few practicing large animal vets in VA and we all want to provide the best quality care possible, it's silly to increase regulations on haul in facilities when we are just trying to provide safe working facilities and support producers

CommentID: 240400

Commenter: Jeffery Vass

3/31/26 7:49 pm

Regulation on veterinary haul in facility

Dear Regulatory Board

I was made aware that they are working towards stricter regulations on facilities for animal welfare. I am a momma cow farmer in VA and have 300+ momma cows. I have cattle in 5 counties. I do not always have the ability to have working facilities or the proper knowledge to handle or best take care of my animals. I depend frequently on my local veterinarian. There's not many of them and they are in short supply as is. I do not see how more regulations can allow them to better help the animals or the farmers. If there's more regulations then there's more for them to watch and worry about and not help the animals in need. They're already in short supply so futher straining their ability to help the farmer is not going to help any one. It will cause animal suffering because it will slow the ability to help and service my animals when I need it. So if anything more regulation on an already over worked veterinarian will worsen animal care. Please do not futher regulate a field that is already over worked.

Jeffery Vass

CommentID: 240401

Commenter: Anonymous

3/31/26 7:50 pm

This is so freaking stupid. Veterinary care is hard enough to access without idiots butting in

I don't have a headgate. So you want to make it harder for me to seek vet care for my sick animals? Adding more stupid hoops to jump through is only hurting the farmers and the veterinarians who are all out here trying to make a living! So instead of keeping it reasonable you want me and my 75 year old wife to just tackle the dang cow and treat her in the field? Come on! Enough beurocracy all ready!

CommentID: 240402

Commenter: Tyra Sharpe

3/31/26 7:55 pm

Public Comment: Impact of Additional Regulations on Large Animal Veterinary Care in Virginia

To Whom It May Concern,

I am writing to strongly oppose additional regulations on large animal veterinary practices in Virginia.

There is already an extreme shortage of large animal veterinarians across the Commonwealth, and my community is a clear example. In Grayson County, the City of Galax, and parts of Carroll County, we have only FOUR large animal veterinarians serving this entire region. The geographic area they are responsible for is vast and, at times, unmanageable. These veterinarians are working beyond capacity to meet the needs of farmers, livestock producers, and animal owners.

Large animal veterinarians are already under immense strain. They routinely work 12–15 hour days and are often on call 24 hours a day. A significant portion of their time is spent traveling between farms and clients' homes—time that could otherwise be spent treating more animals. Despite injuries and personal hardships, they continue to show up because they have no choice. I personally know of a veterinarian who continued working through major surgeries, including shoulder and ankle replacements. Another was severely injured by a horse—suffering a broken jaw and losing teeth—and was back to work the very next day because animals and clients depended on her.

Haul-in facilities are not a luxury—they are a necessity. These facilities allow veterinarians to treat more patients in a single day in a safe, controlled, and properly equipped environment. They are specifically designed for large animal care and provide access to surgical tools, medications, and trained veterinary assistants. Without them, veterinarians are often forced to perform major procedures, including cesarean sections, in fields, on farms, or in outdated barns—conditions that are far less safe for both the animal and the veterinarian.

Additional regulations will not improve care—they will increase costs. Large animal veterinarians already pay substantial fees, taxes, and overhead expenses. Any new regulatory burden will inevitably be passed on to clients. Farmers and small animal owners like myself are already struggling to afford veterinary care. I currently have to make payments to cover my veterinary expenses, and I know I am not alone.

If costs continue to rise, farmers will be forced to make difficult decisions: cutting corners in animal care, reducing herd sizes, or leaving agriculture altogether. Small and family farms are not highly profitable businesses—they are barely sustaining themselves while providing food, dairy, and agricultural products to our communities.

We cannot afford to lose more veterinarians, and we cannot afford to make it harder for them to do their jobs.

I respectfully urge you to reconsider any additional regulations that would place further strain on large animal veterinarians. Please listen to the individuals and communities who will be directly affected—those of us who rely on these professionals every single day.

Thank you for your time and consideration.

Mrs. Tyra Sharpe

4765 Delhart Rd

Galax, VA 24333

ph 276-237-5211

CommentID: **240403**

Commenter: Concerned farmer in Grayson County

3/31/26 8:01 pm

Public Comment: Opposition to Additional Large Animal Veterinary Regulations

To Whom It May Concern,

I am writing to express opposition to additional regulations on large animal veterinary practices in Virginia.

There is already a serious shortage of large animal veterinarians, especially in rural areas. In Grayson County, the City of Galax, and parts of Carroll County, only four veterinarians serve a very large region. These professionals are working long hours, often 12–15 hours a day while also being on call, and spending significant time traveling between farms.

Haul-in facilities are critical to efficient and safe care. They allow veterinarians to treat more animals in a properly equipped environment with the tools, medications, and staff support needed for procedures that would otherwise take place in less suitable field conditions. Limiting or adding burdens to these facilities would reduce efficiency and access to care.

Additional regulations will also increase costs. Veterinarians already carry significant expenses, and any added burden will be passed on to clients. Farmers and small animal owners are already financially strained, and higher costs could lead to reduced care, smaller herds, or farmers leaving agriculture altogether.

At a time when access to large animal veterinary care is already limited, it is important not to create additional barriers that could worsen the situation.

Thank you for your time and consideration.

CommentID: **240404**

Commenter: Anonymous

3/31/26 8:20 pm

Regulation regarding veterinary facilities

To Whom It May Concern,

I am writing to express opposition to additional regulations on large animal veterinary practices in Virginia.

There is already a serious shortage of large animal veterinarians, especially in rural areas. In Grayson County, the City of Galax, and parts of Carroll County, only four veterinarians serve a very

large region. These professionals are working long hours, often 12–15 hours a day while also being on call, and spending significant time traveling between farms.

Haul-in facilities are critical to efficient and safe care. They allow veterinarians to treat more animals in a properly equipped environment with the tools, medications, and staff support needed for procedures that would otherwise take place in less suitable field conditions. Limiting or adding burdens to these facilities would reduce efficiency and access to care.

Additional regulations will also increase costs. Veterinarians already carry significant expenses, and any added burden will be passed on to clients. Farmers and small animal owners are already financially strained, and higher costs could lead to reduced care, smaller herds, or farmers leaving agriculture altogether.

At a time when access to large animal veterinary care is already limited, it is important not to create additional barriers that could worsen the situation.

Thank you for your time and consideration.

CommentID: **240405**

Commenter: Anonymous

3/31/26 8:31 pm

Enough is Enough

With all the regulations already in place we have enough, no more regulations are needed or wanted. Veterinarians carry enough burden already with Emergency Farm Visits, leave well enough alone.

CommentID: **240407**

Commenter: Anonymous

3/31/26 9:09 pm

Regulations

How will these regulations help veterinarians treat more animals?

From how the proposed regulations were written it sounds like there will be more red tape for veterinarians and clients to follow therefore reducing care times and availability. I'm all for helping more animals and lessening the work load on our veterinarians but is it really the best option for everyone involved?

CommentID: **240408**

Commenter: Anonymous

4/1/26 8:42 am

Issue of veterinary farm calls and hauling in

We have had such a critical shortage of large animal veterinarians in this area that there have been times that they don't even have enough Veterinarians to make farm calls. The shortage of rural large animal veterinarians is not isolated just to this area. It also is occurring in North Carolina as many states are likely facing. This is gonna create a large problem for all of us that have livestock. And for the veterinarians themselves trying to care for all these animals one farm at a time. not to mention that will cost more for the farmer/owner of livestock because of fees for farm calls. One of the benefits of being able to haul into their office is that they can see those animals efficiently. When there's a true emergency that occurs on someone's farm And the animal is unable to load then the veterinarian will be better able to attend to their needs. I hope that you will take this issue And all of its consequences Seriously into consideration. I for one I'm so grateful to the veterinarians that care to my horses. I don't know what I would do without them. I feel they know best how to care for our animals and livestock.

CommentID: **240409**

Commenter: Anonymous

4/1/26 11:06 am

Vet services

Given the severe shortage of large animal veterinarian clinics why restrict instead of facilitating access. Allow treatment in clinic and mobile care if your intent is to facilitate care.

CommentID: **240410**

Commenter: anonymous

4/1/26 11:13 am

Vet regulation changes

Regulatory changes are unnecessary as there are too many already. Keep the nonsense up and soon there will be no farmers, vets or FOOD. Try taking care of the people who feed the country.

CommentID: **240411**

Commenter: Anonymous

4/1/26 11:13 am

Vet services

Given the severe shortage of large animal veterinarian clinics why restrict instead of facilitating access. Allow treatment in clinic and mobile care if your intent is to facilitate care.

CommentID: **240412**

Commenter: Anonymous

4/1/26 11:14 am

Vet services

Given the large shortage of large animal clinics, why restrict instead of facilitating access. Allow treatment in clinics and mobile care to facilitate.

CommentID: **240413****Commenter:** Donna Ellisq

4/1/26 11:33 am

Unnecessary regulation

This is an unnecessary regulation and would put more stress on an already over burden veterinary field, costing all parties more in the long run.

CommentID: **240414****Commenter:** Anonymous

4/1/26 12:01 pm

Food Animal Haul in Regulations

Putting restrictions on a large animal haul in facility can be seen as impractical or even counter productive when you consider the purpose these facilities serve. They are designed to handle livestock efficiently, often in high volumes and are essential for agricultural operations, veterinary services and breeding programs.

Additionally, large animal facilities already operate within established industry standards for animal welfare, biosecurity and safety. Adding excessing or redundant restrictions will not meaningfully improve outcomes but could instead burden producers with unnecessary costs and hurdles. This can ultimately impact farmers, transporters and the broader agricultural economy that depends on timely and flexible animal handling.

In many cases, flexibility is critical, weather conditions, emergencies, and seasonal demands all require facilities to adapt quickly. Making stricter regulations could cost the animal its life, not to mention this is the livelihood of the farmer and veterinarian.

CommentID: **240415****Commenter:** Anonymous

4/1/26 12:03 pm

Ridiculousness

With all the problems in the world, is this really a topic we need to be concerned about? Really? People making decisions for hard working people who work 18+ hours a day to put food on your table, and this is the thanks we get. Bravo Government!

CommentID: **240416****Commenter:** Michael A Campbell Sr

4/1/26 9:59 pm

Shared veterinary care facilities

I think that shared facilities for large animal care by veterinarians is an excellent idea! I support it 100%.

CommentID: **240418**

Commenter: Anonymous

4/1/26 10:37 pm

The negative impact of further regulations on animal owners/producers and veterinarians

To Whom It May Concern:

I am writing to oppose Action 6824: Regulation of haul-in facilities for veterinary services in Virginia. This action will serve to further burden an already over-worked industry, and we simply cannot afford that misstep in our food system, our communities, and this industry.

Haul-in facilities are critical to efficient, workable veterinary care for large animals, and need to be able to operate without increased regulatory requirements that will place greater cost on the providers and clients. There are simply not enough hours in the day for the current workforce of veterinarians in our area to reach every need already, and the ability to haul in to a facility increases the chances that our animals can be seen and cared for in a timely manner while saving resources and time. It is better for the people and better for the animals.

Addressing the shortage of large animal veterinarians is noble, but introducing and increasing regulations regarding haul-in facilities is not the answer. Please reconsider this unnecessary regulatory burden.

CommentID: **240419****Commenter:** Anonymous

4/1/26 10:42 pm

Haul-in vs Hospital/Clinic

It is my understanding that there are currently no existing regulations on large animal veterinary haul-in facilities and actually no way to certify a facility as a "haul-in." Currently there is the option of being licensed as a large animal AMBULATORY ONLY establishment or a large animal HOSPITAL. A practice that has no desire or capability to hospitalize for days or weeks, but would like to offer a location for veterinary "out-patient" services is limited to an ambulatory license. Those practices should be allowed to legally provide a location for services when needed by the clients and when logistics of providing those services for clients from several different locations would be simplified and much more efficiently done in a haul-in facility. Please take into consideration PRACTICAL limitations of a haul-in facility. These facilities could be very basic... appropriate restraining equipment (ie chute, stocks, etc) ability to clean out and sanitize after procedures, temporary holding stalls or pens, and storage for equipment and medications. But a haul-in facility is not a full-time staffed clinic, especially if the ambulatory veterinarian(s) are out doing farm calls. This facility should not be regulated as a large animal hospital or a fully-staffed clinic where animals are hospitalized for treatment for an extended period of time or permitted to show up at any time. As an example, a haul-in facility is as simple as Farmer A has a great working facility and his neighbor Farmer B has no facility. So Farmer B asks to borrow Farmer A's facility for his veterinarian to come pregnancy check his cattle. No regulations. No red tape. An agreement between farmers. It should be just as simple for a veterinarian to offer a facility for farmers to utilize for these services. Please keep these regulations simple so that there are no additional financial burdens on the veterinarians or their clients. We all want to see good biosecurity measures to prevent disease, but please don't complicate the large animal veterinary profession with unattainable goals for small, barely surviving farm veterinarians that already work 16-18 hours a day. Thank you.

CommentID: **240420**

Commenter: Victoria

4/2/26 7:32 am

We live here in SW VA by choice

The reason we came was the robust farming and depth of excellent services for our livestock. It is critical that the services stay in place to support the critical needs of a strong farming community. Our large animal vets are excellent and need to be strongly supported. Please feel free to contact me anytime if you need additional information.

CommentID: 240421

Commenter: Anonymous

4/2/26 7:54 pm

Another regulation backed with ZERO.Common Sense

There is a great shortage of large animal veterinarians. Haul-In options are imperative to save time. The time saving element of haul in facilities can mean the difference in life or death for our animals. In our rural area the vets would spend all day traveling around, this option allows them to service many more clients. The haul in option is the only way to retain large animal vets and is critical to assist in timely treatment for our animals.

CommentID: 240425

Commenter: JG

4/5/26 3:29 pm

Large Animal Facility Regulations

Its not useful to add more regulations for haul in facilities when they provide such an important option for farmers. Many farmers don't have livestock handling facilities and haul in clinics provide a safe working environment that is effective to perform procedures that would have been done on the ground in a barn. More regulations can make it harder for haul in facilities to stay in business which causes a negative impact especially in areas where vets are in such short supply such as here in south-west Virginia. We don't need higher costs for farmers for facility requirements changes that don't significantly improve a procedure outcome.

CommentID: 240428

Commenter: Virginia Farm Bureau

4/6/26 12:39 pm

Support for new shared haul-in facility model

Virginia Farm Bureau is supportive of the new proposed shared haul-in facility model that will greatly expand producer access to veterinary services and provide veterinarians with expanded flexibility to see animals in more spaces than currently allowed. Having been a part of the Regulatory Advisory Panel discussing this, it is clear that this regulatory framework will not impact any existing haul-in facility and will be optional for any veterinarian, producer, or community to invest in and utilize.

CommentID: 240431

Commenter: Anonymous

4/6/26 2:21 pm

Regulations

To Whom It May Concern,

I am writing to express opposition to additional regulations on large animal veterinary practices in Virginia.

There is already a serious shortage of large animal veterinarians, especially in rural areas. These professionals are working long hours, often 12–15 hours a day while also being on call, and spending significant time traveling between farms.

Additional regulations will also increase costs. Veterinarians already carry significant expenses, and any added burden will be passed on to clients. Farmers and small animal owners are already financially strained, and higher costs could lead to reduced care, smaller herds, or farmers leaving agriculture altogether.

At a time when access to large animal veterinary care is already limited, it is important not to create additional barriers that could worsen the situation.

Thank you for your time and consideration.

CommentID: **240432**

Commenter: Anonymous

4/6/26 4:37 pm

Oppose Regulations

To Whom It May Concern,

I am writing to express opposition to additional regulations on large animal veterinary practices in Virginia.

There is already a serious shortage of large animal veterinarians, especially in rural areas. These professionals are working long hours, often 12–15 hours a day while also being on call, and spending significant time traveling between farms.

Additional regulations will also increase costs. Veterinarians already carry significant expenses, and any added burden will be passed on to clients. Farmers and small animal owners are already financially strained, and higher costs could lead to reduced care, smaller herds, or farmers leaving agriculture altogether.

At a time when access to large animal veterinary care is already limited, it is important not to create additional barriers that could worsen the situation.

Thank you for your time and consideration.

CommentID: **240433**

Commenter: Anonymous

4/6/26 9:27 pm

Unnecessary regulation

I think laying minimum requirements on a haul in facility so to give the board an opportunity to fine a practitioner for non compliance is a good way to stymie a practitioner from investment in such a facility. A haul in facility is a necessity in order to maximize a practitioner's time management. I think you see this where you work. It takes money and time to develop a haul in. I think the board, by imposing edicts to govern practitioners attempting to improvise a haul in, will simply make rural practice less profitable. In the end, rural practice would be less sustainable and rural clientele offered less services. I feel that the board of veterinary medicine would best serve rural practitioners and their clientele best by allowing each rural practitioner to best define and decide on how to invest their money in facilities with out requirements handed down and inspected by inspectors that have little idea of the needs and responsibilities of a food animal practitioner.

CommentID: 240434

Commenter: Anonymous

4/6/26 9:33 pm

Needs more definition

As a large animal veterinarian in one of the most densely populated agricultural areas in the state, new regulation on haul-in facilities is concerning. I utilize a large, well built, well established haul-in facility in my practice on a daily basis. Having a haul-in facility allows my colleagues and I to see more patients in a timely manner that we ever could running from one end to the other of a 120-mile practice area. Our facility is already inspected in the same manner that our small animal clinic is inspected. There seems to be no need for additional regulation/inspection. Additional regulations and inspections on these facilities is only going to bar their use and further add to the problem of inconsistent availability of large animal veterinarians.

CommentID: 240435

Commenter: Anonymous

4/6/26 11:55 pm

Un needed regulation

This regulation is being created to fix a problem that doesn't exist. If there have been no complaints to the board about haul-in facilities previously. Why regulate them at this point? It will simply give food animal veterinarians a reason to not invest in a facility and further limit farmers ability to find veterinary care.

CommentID: 240436

Commenter: Anonymous

4/6/26 11:59 pm

increased regulation stymies competition

Increasing regulatory oversight of veterinary medicine only serves to further ensconce corporate veterinary conglomerates as the only source of veterinary care. Corporations can afford to comply with regulations and can hire attorneys and lobbyists to erode and influence them when needed. Private veterinarians can't afford to stay on top of regulations or hire professionals to keep them informed. Gradually they get squeezed out of the market and only the corporations remain. Cost to consumers goes up and access to care goes down.

CommentID: 240437

Commenter: Meagan L.

4/7/26 8:16 am

Changes will impact care

Unnecessary changes and new regulations will limit Veterinarian care in an already crisis point shortage. Our animals/livestock deserve to have access to the care they need in a timely manner and these changes will impact this.

CommentID: 240441

Commenter: William Johnson / 523

4/7/26 6:54 pm

Burdensome regulations

The last thing we need is more regulations and hoops to jump through in order to get veterinarians to work on our large animals. Allow this to be optional. Most large animal are required farm calls.

CommentID: 240443

Commenter: Thach Winslow, DVM

4/7/26 8:47 pm

Situation Analysis and Proposed Remediation

I am writing in response to the: **Notice of Intended Regulatory Action Notice is hereby given in accordance with § 2.2-4007.01 of the Code of Virginia that the Board of Veterinary Medicine intends to consider amending 18VAC150-20, Regulations Governing the Practice of Veterinary Medicine.**

The purpose of the proposed action is to establish rules for haul-in veterinary facilities. The rulemaking action is result of the 2025 Report of the Large Animal Veterinarian Shortage Study Workgroup. A haul-in veterinary facility allows owners to bring animals to veterinarians at an inspected facility for treatment. Proposed provisions may include developing a model for regulating haul-in facilities, including facility registration, inspection, and treatment standards.

2025 Report of the Large Animal Veterinarian Shortage Study Workgroup

Executive Summary:

Pursuant to the Joint Resolutions, the Board of Veterinary Medicine ("Board") and the State Veterinarian convened a workgroup which met multiple times over the course of 2024. The workgroup considered the required topics of the Joint Resolutions, which were as follows:

The financial resources subgroup recommended exploring development of: (1) a loan repayment program that ties awards to practice in underserved communities; (2) matching awardees of grants with mentors to assist with grant-writing and other facets of mentorship; (3) developing a pathway for haul-in(*1) or shared use large animal veterinary facilities to address shortages in a variety of ways:

.....

Financial Resources

Haul-in facilities would allow owners to bring animals to veterinarians to be treated at an inspected facility. Currently, there is no provision that allows practice to occur away from the location of the animal. Under current regulations, veterinary medicine may only be practiced out of a registered establishment categorized as stationary (“bricks and mortar”) or ambulatory (generally house calls or farm visits). Large animal veterinarians often travel extensively to provide healthcare at animals’ locations, impacting patient safety and contributing to burnout and attrition. Haul-in facilities would enable veterinarians to treat more patients, would address environmental factors (inclement weather, poor barn lighting), and travel times without requiring the veterinarian to incur the financial burden of opening and maintaining a stationary establishment.

I would like to make the following points:

COMMENT 1: Having owned and operated a large animal ambulatory practice in Virginia for over seventeen years, I treated animals under the jurisdiction and rules of the Commonwealth in a multitude of locations other than on the producer’s farm, including on the producer’s neighbor’s farm, at livestock markets, at fairgrounds, at the Virginia Horse Center, the Salem Civic Center, and other similar venues, at the Beef Expo, the State Fair, “Sissy’s scales on route 42 writing health certificates, the wayside pull-off in Staffordsville, VA where we did Coggins, vaccines, and dental clinics, and on a trailer in my office parking lot, none of which were “a registered establishment” and all of which were “ambulatory” where animals were congregated at a single premises other than the farm of origin.

COMMENT 2: The Purpose of the proposed action: “A haul-in veterinary facility allows owners to bring animals to veterinarians at an inspected facility for treatment.” is taken out of the context underlined in the committee’s Executive Summary (above).

Note the underlined phrases: “recommended exploring” / “developing a pathway” / “shared use large animal veterinary facilities” / “Haul-in facilities would allow owners to bring animals to veterinarians to be treated at an inspected facility” / “without requiring the veterinarian to incur the financial burden of opening and maintaining a stationary establishment”

It is vague, at best, what exactly the definition of a haul-in facility is, and having only mentioned "inspected" once, it IS only suggestive that they might require inspection.

The KEY POINT here that a the definition of a “Haul-in Facility” has not been established.

I find it premature to establish rules for haul-in facilities before they have been properly defined.

COMMENT 3: If the Board of Veterinary Medicine still sees a need to amend 18VAC150-20, Regulations Governing the Practice of Veterinary Medicine. I suggest it simply adds language such as the following:

Definition of Haul-in Facility: An uninspected premises, other than the farm of origin or a veterinary hospital, that animals are aggregated, transported, or collected at to facilitate the provision of veterinary care by a licensed ambulatory veterinarian.

CommentID: **240444**

Commenter: Thach Winslow, DVM

4/7/26 9:55 pm

AI Summary of Comments Previous to mine....

Overview

The expanded feedback from Virginia’s agricultural community reflects a deep sense of frustration and urgency regarding proposed regulations for "haul-in" veterinary facilities (Action 6824). Stakeholders, including large-scale producers and residents in rural counties like Grayson and

Carroll, argue that the large animal veterinary field is already at a breaking point due to critical shortages and extreme workloads. The prevailing sentiment is that further "red tape" will not improve animal welfare but will instead lead to increased costs, reduced access to care, and potential animal suffering.

Summary of Key Points

- **Veterinary Shortage and "Breaking Point":**
 - Rural areas face a severe lack of practitioners; for example, parts of Grayson, Carroll, and Galax are served by only four large animal veterinarians.
 - Current veterinarians often work 16–18 hour days and continue to practice through severe physical injuries (e.g., broken jaws, surgeries) because there is no one else to cover the region.

- **Essential Role of Haul-in Facilities:**
 - **Efficiency:** These facilities allow veterinarians to see multiple animals at one location, saving hours of travel time that can instead be used for actual treatment.
 - **Safety & Welfare:** Haul-in clinics provide safe, professional restraint equipment (like headgates and chutes) that many farmers do not own. Forcing field-only treatment is described as dangerous for both aging farmers and the animals.
 - **Advanced Care:** Certain procedures, such as C-sections or long-term IV fluid maintenance, are significantly safer and more effective in a controlled facility than in a field or outdated barn.

- **Opposition to New Regulations (Action 6824):**
 - **Unnecessary Burden:** Commenters believe existing standards for biosecurity and safety are sufficient and that new rules will only add "red tape."
 - **Reduced Availability:** There is a high risk that stricter rules will cause practitioners to stop offering haul-in services altogether to avoid the administrative and financial costs of compliance.
 - **Legal Discrepancies:** It is noted that currently, no specific "haul-in" license exists; practices are often forced to choose between an "Ambulatory" license (mobile only) or a full "Hospital" license (requiring 24/7 staffing), neither of which perfectly fits a basic out-patient haul-in facility.

- **Economic Impact on Producers:**
 - New regulatory costs will inevitably be passed on to farmers who are already operating on thin profit margins.
 - Higher costs could force families to reduce their herd sizes or leave agriculture entirely, threatening the local food supply.

- **Flexibility and Local Support:**

- Producers emphasize the need for "practicality," suggesting that a haul-in facility should be as simple as an agreement between neighbors or a basic site for safe restraint and sanitation rather than a full-scale hospital.

CommentID: **240445**

Commenter: Trey Davis

4/8/26 5:56 am

Comments from Virginia Agribusiness Council

The Virginia Agribusiness Council supports the development of new, available, and convenient treatment locations for Virginia's livestock producers. A proposed shared haul-in facility model represents a meaningful opportunity to expand veterinary service options, particularly for animal agriculture operations in rural Virginia that often face limited access to timely animal care.

If these regulations help establish new opportunities for veterinary care and strengthen service availability across the Commonwealth, the Virginia Agribusiness Council will be supportive. We view this as a practical, forward-looking approach that enhances animal health infrastructure while respecting the diversity of Virginia's agricultural operations.

Trey Davis

President and CEO, Virginia Agribusiness Council

CommentID: **240446**

Commenter: LAW

4/8/26 11:23 am

Large Animal Facility Regulations

The haul in regulations are not well defined to me. If changes are made that cause a negative impact to veterinarians, animal care and farmers, then this could create cost increases for all. This is especially concerning due to the current economic strain.

CommentID: **240447**

Commenter: Virginia Cattlemen's Association

4/8/26 12:21 pm

Requesting additional comment period after regulation is public

Virginia Cattlemen's Association's (VCA) adopted policies state:

- The Association supports cattle care decisions made in the best scientific knowledge and professional experience and opposes state or local policies that are burdensome, unreasonable, and unnecessarily affect the ability of a cattle producer to care for or sustainably endeavor to produce cattle.
- The Association supports animal health regulations that are minimally invasive on direct cattle production management and preserve individual rights to manage land, water and other on farm natural resources.

VCA supports opportunities to provide accessible and convenient treatment locations for cattle producers. To the extent that a new regulation is needed to help create new opportunities for veterinary care that are compliant with the law, VCA would be supportive.

While VCA appreciates the opportunity to comment on this notification, we are unable to provide more thorough feedback until a draft regulation is made public. We request that if a regulation is proposed, an additional public comment opportunity be provided so that we can provide more detailed input on how it would potentially impact Virginia's cattle industry, producers and providers.

CommentID: 240448

Commenter: Jeff Powers, Bedford County Agriculture Economic Advisory Board

4/8/26 5:33 pm

Concerns for Purposed Hail-in Regulations from Bedford Co. Ag Board

My name is Jeff Powers and I serve as Chair of the Bedford County Agriculture Economic Development Advisory Board. I'm also a lifelong cattle producer here in Bedford County, and like most farmers, I depend on reliable large animal veterinary services to keep my operation running.

I appreciate the opportunity to share some thoughts on the proposed regulations regarding large animal veterinary haul-in facilities.

Any time new regulations are considered, I believe it's worth stepping back and asking a few basic questions. What problem are we trying to fix? Is it happening enough to justify regulation? And will the regulation solve it without creating new problems along the way?

From where I sit, both as a producer and through my work with agriculture in this county, I am not aware of producers raising concerns about the adequacy of haul-in facilities. I've worked with veterinarians for decades, and like most farmers, I rely on their professionalism and judgment. In my experience, veterinarians already have strong incentive to keep their facilities safe and functional. If they don't, word travels fast in farm country, and producers will go somewhere else.

That makes me wonder whether this regulation is addressing a real, documented issue, or more a concern that exists on paper rather than in practice.

What does concern me is the cost that could come with compliance. We already face a shortage of large animal veterinarians across rural Virginia. Anything that increases the cost of operating a haul-in facility - whether it's construction requirements, inspections, or ongoing paperwork - has the potential to discourage veterinarians from offering these services. For many of us, that could mean longer travel distances, delayed care and fewer options when livestock need attention.

There's also the cost to taxpayers to consider. Regulations require oversight, inspections, and administration. That all carries a price tag. Before adding the burden, it seems reasonable to be certain the benefit justifies the expense.

If there truly is a need for consistent standards, I would encourage the Board to consider whether voluntary industry standards or certification programs might accomplish the same goal without adding regulatory weight. Agriculture has long relied on professional standards and accountability within the industry, and that approach has served producers well.

I would also encourage careful review of how these regulations would affect existing facilities. If current facilities are exempt, then it's fair to ask whether the regulation will actually address the issue it is meant to solve. If they are not exempt, the cost of bringing older facilities into compliance could be significant and could further strain veterinary availability.

At the end of the day, farmers depend on veterinarians just as much as veterinarians depend on farmers. We need policies that support that relationship, not make it hard to maintain.

Thank you for taking time to consider input from those of us who rely on these services every day. I would encourage the Board to carefully weigh the real-world need for these regulations against the potential cost and impact on rural veterinary access.

Respectfully,

Jeff Powers, Chairman

Bedford County Agriculture Economic Development Advisory Board

CommentID: **240450**

Commenter: Virginia State Dairymen's Association

4/8/26 8:14 pm

Further details needed

The Virginia State Dairymen's Association (VSDA) appreciates the opportunity to comment on the Board's intent to establish rules for haul-in veterinary facilities. As Virginia's dairy industry faces ongoing challenges regarding large animal veterinarian availability, we are generally supportive of efforts to create flexible, shared infrastructure that brings care closer to the farm. The potential for haul-in facilities at regional agricultural complexes, fairgrounds, or private handling sites is a thoughtful proposal that offers a practical solution to reduce travel burdens for both producers and practitioners. Providing a centralized, well-equipped environment for procedures and treatments will enhance animal welfare and improve the operational efficiency of our dairy farms.

However, the VSDA remains mindful that the success of this initiative depends on the specific regulatory framework. We support a model that increases opportunity without imposing burdensome or cost-prohibitive requirements on those who choose to host or utilize these optional facilities. Like our partners in the agribusiness community, we look forward to reviewing the draft regulations once available to ensure they provide the necessary flexibility to encourage ingenuity and investment in rural animal health infrastructure.

CommentID: **240452**

----- Forwarded message -----

From: <[REDACTED]@aabp.org>

Date: Thu, May 21, 2026 at 11:53 AM

Subject: <AABP Members> Jackman to discuss the benefits of haul-in facilities at AABP Annual Conference

To: <[REDACTED]@gmail.com>

Thinking about adding or improving haul-in facilities to increase services? You will not want to miss Dr. Rob Jackman's presentation "Build it and they will haul in" in the Practice Management session at the 2026 AABP 59th Annual Conference Aug. 27-29 in Minneapolis, Minn.

Jackman says originally, he was limited in what he could accept as haul-in clients and had an increasing number of clients requesting this, so he built a facility at his Indiana practice to enable them to handle those requests. "The clinic addition has allowed us to provide service to clients who wish to bring everything from a load of steers from the stockyard for vaccinations, to the seedstock producer who wants to flush embryos," he says. "There is a growing number of clients who have the ability and want to bring an animal to the clinic for care." Jackman was mainly concerned with the efficiency and safety of his staff. For instance, few of his clients had the facilities for holding a mature bull for a reproductive exam or a lameness issue.

Some of the ways Jackman has used his haul-in facilities and built more services around it:

- Small ruminant emergencies.
- Cattle dystocias or lameness exams. "Before, we had to send clients with cattle hoof issues two hours to Purdue University or Ohio State University for care."
- Beef weigh-in days for 4-H fair entries for every county in the region. "Beef 4-H fair entrees must register and weigh in every spring for every county," Jackman says. "These weigh-ins are held in late winter and are held outside at county fairgrounds. With our facility, we can provide an inside experience, working with multiple counties over multiple weekends, so there is more flexibility for 4-H students and staff." He says a veterinarian is also on site to discuss any questions the students might have and talk with them about health care, vaccinations and feeding requirements.
- Large animal necropsy. "I have the availability to have an individual haul in something for necropsy and then haul directly to a rendering service 15 miles from our clinic where they can render the animal for no cost to the owner."
- Large amount of herd wellness. "We also needed to understand the time for owners to gather enough trucks and trailers to haul in large quantities cattle," Jackman explains. "Once our clients saw how our building works and operates, we have so many more that will bring in a load of cattle, and while we work that group, will go back and get another group to bring in and we keep switching groups out."

For the community aspect, Jackman says they have had a lot of non-client-based individuals coming to the facility which then spreads the word, and more and more individuals reaching out to help facilitate programs through local FFA chapters and 4-H programs. "We have also seen an increase in hosting externships for individuals who want to become either a mixed animal practitioner or large-animal-only practitioner."

Jackman says the haul-in facility provides more consistent experiential learning opportunities to a wider range of high school, college and veterinary students as well as helping educate food animal producers to better care for the animals in their charge. "I didn't know how much of a difference it would make until we worked in it."

Part I. General Provisions.

18VAC150-20-10. Definitions.

"Veterinary establishment" or "establishment" means any stationary or ambulatory practice, veterinary hospital, animal hospital, or premises wherein or out of which veterinary medicine is being conducted.

“Haul-in facility” or “facility” means a veterinary facility in which health care is provided to agricultural and equine animals.

18VAC150-20-100. Fees.

The following fees shall be in effect:

Initial veterinary establishment registration	\$300
Veterinary establishment renewal	\$200
Veterinary establishment late renewal	\$75
Veterinary establishment reinstatement	\$75
Veterinary establishment reinspection	\$300
Veterinary establishment – change of location	\$300
Veterinary establishment – change of veterinarian-in-charge	\$40
<u>Initial haul-in facility registration</u>	<u>\$100</u>
<u>Haul-in facility renewal</u>	<u>\$50</u>
<u>Haul-in facility late renewal fee</u>	<u>\$25</u>
<u>Haul-in facility reinstatement</u>	<u>\$50</u>
<u>Haul-in facility reinspection</u>	<u>\$100</u>

Part V. Veterinary Establishments.

18VAC150-20-180. Requirements for a registered 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 establishment, ~~or~~ ambulatory establishment, or haul-in facility. Every veterinary establishment and haul-in facility 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 or facility except in emergency situations or as provided in subsection A(4).
2. An application for registration must be made to the board 45 days in advance of opening or changing the location of the establishment or facility or requesting a change in the establishment category listed on the registration.
3. Any addition or renovation involving changes to the structure or composition of a surgical room within a stationary establishment, ~~or an~~ ambulatory establishment, or haul-in facility shall require, prior to its use, submission of an application and reinspection fee and reinspection by the board.
4. A veterinary establishment registration is not required for a licensed veterinarian to conduct drug testing at animal shows and events or to examine any animal and express a professional judgement as to its health at any of the following:
 - a. Genetic screening clinics where animals are examined for cardiac, ophthalmic, and auditory diseases;
 - b. Agricultural fairs;
 - c. 4-H or other youth organization competitions;
 - d. Livestock auctions;
 - e. Horse races;
 - f. Hunt club events;
 - g. Pet adoption events;
 - h. Animal shows, including dog, cat, and horse shows; and
 - i. Rabies clinics pursuant to § 3.2-6521 of the Code of Virginia.

B. A veterinary establishment or haul-in facility will be registered by the board when:

1. It is inspected by the board and is found to meet the standards set forth by 18VAC150-20-190 and 18VAC150-20-200, ~~or~~ 18VAC150-20-201 or 18VAC150-20-202 where applicable.
2. A veterinarian currently licensed by and in good standing with the board is registered with the board in writing as veterinarian-in-charge and ensures that the establishment or facility registration fee has been paid.

C. If, during a new or routine inspection, the board finds violations or deficiencies necessitating a reinspection, the veterinary establishment or facility must pay the prescribed reinspection fee.

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 Act (21 USC § 301 et seq.), the Prescription Drug Marketing Act (21 USC § 331, 353, and 381), and the Controlled Substances Act (21 USC § 801 et seq.), as well as applicable portions of Title 21 of the Code of Federal Regulations.

B. All drug records must be retained for three years.

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

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

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.

E. All veterinary establishments and facilities shall maintain drugs in a secure manner with precaution taken to prevent theft or diversion. Only the veterinarian, veterinary technician, pharmacist, or pharmacy technician under the supervision of a pharmacist shall have access to or prepare Schedules II through V drugs, with the exception provided in subdivision 4 of this subsection. No Schedule II through V drugs may be stored in a haul-in facility.

1. In a stationary establishment, the general stock of Schedules II through V drugs shall be stored in a securely locked cabinet or safe that is not easily movable.
2. The establishment may also have a working stock of Schedules II through V drugs that shall be kept in (i) a securely locked container, cabinet, or safe when not in use or (ii) direct possession of a veterinarian or veterinary technician. A working stock shall consist of only those drugs that are necessary for use during a normal business day or 24 hours, whichever is less.

3. Whenever the establishment is closed, all general stock, working stock, and any dispensed prescriptions of Schedule II – V drugs that were not delivered during normal business hours shall be securely stored as required for the general stock.

4. 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.

5. Access to drugs by unlicensed persons shall be allowed only under the following conditions:

a. An animal is being kept at the establishment outside of the normal hours of operation, and a licensed practitioner is not present in the facility;

b. The drugs are limited to those dispensed to a specific patient; and

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

d. Prescription drugs that have been dispensed and prepared for delivery may be delivered to an owner by an unlicensed person as designated by the veterinarian. All prescriptions prepared for delivery shall be maintained under lock or in an area that is not readily accessible to the public.

F. Schedule II through V drugs shall be destroyed in accordance with DEA regulations. Such destruction may occur by (i) transferring the drugs to another entity authorized to possess or provide for proper disposal of controlled substances or (ii) rendering the drugs non-retrievable in compliance with applicable local, state, and federal laws and regulations. If Schedule II - V drugs are to be destroyed on site, the appropriate 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 for three years unless otherwise required by state or federal regulations.

G. The drug storage area shall have appropriate provision for temperature control for all drugs and biologics. If drugs requiring refrigeration are maintained at the establishment, the drugs shall be kept in a refrigerator with the interior thermometer maintained between 36°F and 46°F. Schedule II – V refrigerated drugs shall be maintained with precaution taken to prevent theft or diversion, either in a locked container of substantial, rigid construction that is securely affixed to the refrigerator, or the refrigerator shall be locked securely.

H. The stock of drugs shall be reviewed frequently, and expired drugs shall be clearly marked and removed from the working stock of drugs at the expiration date. Drugs whose expiration is

determined by date of initial use shall be clearly marked to show the new expiration date. Expired drugs shall not be administered or dispensed.

I. A distribution record shall be maintained in addition to the patient's record, in chronological order, to account for the administration, dispensing, and wasting of all Schedule II - V drugs. Distribution records for Schedule II drugs shall be continuous, maintained separately from all other drugs, and reconciled at least monthly. Distribution records for butorphanol to canine patients and buprenorphine to feline patients shall be maintained and reconciled monthly if dispensed for use outside of the establishment. Reconciliation requires an explanatory note on the inventory for any difference between the actual physical count and the theoretical count indicated by the distribution record. All distribution records shall be maintained for a period of three years from the date of transaction and made available for inspection upon request. This distribution record shall clearly document the following:

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

J. Legible invoices for all Schedule II through V drugs received shall be maintained in chronological order at the address of record on file with the Drug Enforcement Administration, and the actual date of receipt shall be noted.

K. A complete and accurate inventory of all Schedule II - V drugs, including all expired drugs maintained on the premises, shall be taken within two years of the previous biennial inventory, when there is a change in the veterinarian-in-charge, or change of location. The inventory shall contain the following:

1. Date;
2. Notation of whether inventory was taken at open or close of business. 24-hour establishments with no open or closing designation shall not ethe time the inventory is taken;
3. Name of drug, strength, and actual count of substance; and
4. Signature of the veterinarian-in-charge.

L. Inventories and records, including original invoices, of Schedule II drugs shall be maintained separately from all other records.

M. Veterinary establishments in which bulk reconstitution of injectable, bulk compounding, or the repackaging of drugs is performed shall maintain adequate control records for a period of one

year or until the expiration, whichever is greater. The records shall show the name of the drugs used; strength, if any; date repackaged; quantity prepared; initials of the veterinarian verifying the process; the assigned lot or control number; the manufacturer's or distributor's name and lot or control number; and an expiration date. The drug's name; strength, if any; the assigned lot or control number or the manufacturer's or distributor's name and lot or control number; and an appropriate expiration date determined by the veterinarian in accordance with USP guidelines shall appear on any subsequently repackaged or reconstituted units.

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

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

A. A stationary establishment shall provide surgery and encompass all aspects of health care for small or large animals, or both. All stationary establishments shall:

1. Provide sanitary facilities and maintain temperature, lighting, and ventilation for the care and medical well-being of patients, and a method for storing and disposing of deceased animals in accordance with any local ordinance or state and federal regulations.
2. 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 on site.
3. 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 staffing in compliance with § 54.1-3806.1 of the Code of Virginia.
4. Provide for continuity of care when a patient is transferred to another establishment.
5. A limited stationary establishment shall post in a conspicuous manner the specific limitations on the scope of practice.

B. A stationary establishment may include ambulatory services.

C. A separate establishment registration is required for separate practices that share the same location

D. All stationary establishments shall meet the following equipment requirements:

1. Areas within building. The areas within the facility shall include the following:
 - a. A reception area separate from other designated rooms;
 - b. Examination room or rooms appropriate to the species of the patient being treated;
 - c. A room that is reserved only for surgery, constructed of nonporous materials, and used for no other purpose. The surgery room shall be of adequate size to accommodate patients and be equipped with surgical supplies, instruments, and equipment commensurate with the services provided, and compatible with current veterinary medical practice with regard to anesthesia, asepsis, life support, and monitoring procedures. The surgery room shall have surgical and automatic emergency lighting to facilitate performance of procedures. Establishments that perform surgery on small animals shall have a door to close off the surgery room from other areas of the practice.
2. A stationary or ambulatory veterinary establishment shall have, at a minimum, proof of use of either in-house laboratory service or documentation of outside laboratory services, consistent with appropriate professional care for the species being treated.
3. A stationary or ambulatory veterinary establishment shall either have radiology service in-house or documentation of outside services for obtaining diagnostic-quality radiographs. If radiology is in-house, the establishment shall:
 - a. 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; and
 - b. Maintain and utilize lead aprons and gloves and individual radiation exposure badges for each employee exposed to radiographs.
4. A veterinary establishment shall ensure the provision of adequate accommodations and exercise areas of appropriate size and construction to prevent residual contamination or injury. Such accommodations must allow for the effective separation of contagious patients as needed. An animal identification system shall be used at all times when housing an animal in the establishment.

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.

B. House call or proceduralist establishment. 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 patient.

1. Surgery may be performed only 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.

2. House call or proceduralist establishments shall meet the requirements of a stationary establishment for laboratory, radiology, and minimum equipment, with the exception of equipment for assisted ventilation.

C. Mobile service establishment. 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.

D. A separate establishment registration is required for separate practices that share the same location.

18VAC150-20-202. Standards for haul-in facilities.

A. All haul-in facilities shall:

1. Have space, equipment, and supplies appropriate to the species being treated for containment, examination, treatment, and surgery that is constructed of solid material and allows for appropriate drainage, disinfection, and sanitation;
2. Provide and maintain appropriate temperature, lighting, ventilation, water, and other essential utilities for the care and medical well-being of patients;
3. Have an appropriate method for the storage and disposal of deceased animals in accordance with any local ordinances or state and federal regulations; and
4. Allow for the effective separation of contagious patients as needed.

B. Veterinarians and licensed veterinary technicians that provide treatment at a haul-in facility must be associated with a stationary or ambulatory establishment registered in Virginia. All Schedule II through V drugs, drug records, and patient records shall be maintained and stored by the stationary or ambulatory establishment in accordance with state and federal laws and regulations. Only Schedule VI drugs, prescription drugs, and biologics may be stored at a haul-in facility.

C. If more than one establishment utilizes the haul-in facility, the VIC shall maintain a legible record of all animals treated at the haul-in facility that includes the owner, patient ID, practitioner who treated the patient, and the date of treatment.