

February 19, 2021
Virtual Meeting
2:00 p.m.

Agenda
Virginia Board of Veterinary Medicine
Inspection Committee Meeting

VIRTUAL MEETING

******Refer to Page 2 of the Agenda for Meeting Access Information******

Call to Order – Tregel Cockburn, D.V.M., Chair

Page 1

- Welcome and Roll Call
- Introduction of New Staff
- Mission Statement

Ordering of Agenda – Dr. Cockburn

Public Comment – Dr. Cockburn

The Board will receive all public comment related to agenda items at this time. The Board will not receive comment on any regulatory process for which a public comment period has closed or any pending or closed complaint or disciplinary matter. (See **instructions on page 2 for providing public comment during virtual meeting.**)

Approval of Minutes – Dr. Cockburn

Pages 2-3

- December 17, 2020 – Committee Meeting

Discussion Items – Dr. Cockburn

Pages 4-46

- Guidance Document Review – **Leslie Knachel**
 - 150-6 Ambulatory Mobile Service Establishments (page 4)
 - 150-7 Disposition of Cases Involving Failure of Veterinarian-in-Charge to Notify Board of Veterinary Establishment Closure (pages 5-7)
 - Review Working Draft of Guidance Document for Veterinary Inspections (pages 8-16) – **Ms. Knachel**
- Review Types of Deficiency Responses (pages 17-46) – **Ms. Knachel**

New Business – Dr. Cockburn

Next Meeting – Ms. Knachel

Meeting Adjournment – Dr. Cockburn

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

Instructions for Accessing February 19, 2021 Virtual Full Board Meeting and Providing Public Comment

- **Access:** Perimeter Center building access remains restricted to the public due to the COVID-19 pandemic. To observe this virtual meeting, use one of the joining options below. Participation capacity is limited and is on a first come, first serve basis due to the capacity of CISCO WebEx technology.
- **Written Public Comment:** Written comments are **strongly preferred** due to the limits of the electronic meeting platform and should be submitted by email to leslie.knachel@dhp.virginia.gov no later than 12:00 noon on February 18, 2021. The written comments will be made available to the committee members for review prior to the meeting.
- **Oral Public Comment:** Oral comments will be received during the full board meeting from persons who have submitted an email to leslie.knachel@dhp.virginia.gov no later than 12:00 noon on February 18, 2021, indicating they wish to offer oral comment at the board meeting. Comment may be offered by these individuals when their names are announced by the meeting chair.
- Public participation connections will be muted following the public comment periods.
- Should the Committee enter into a closed session, public participants will be blocked from seeing and hearing the discussion. When the Committee re-enters into open session, public participation connections to see and hear the committee meeting will be restored.
- Please call from a location without background noise.
- Dial (804) 597-4129 to report an interruption during the broadcast.
- FOIA Council *Electronic Meetings Public Comment* form for submitting feedback on this electronic meeting may be accessed at <http://foiacouncil.dls.virginia.gov/sample%20letters/welcome.htm>.

JOIN THE INTERACTIVE MEETING (NOTE: WebEx is a video and audio platform and best accessed by connecting with a mobile device which has a built-in microphone and camera. Laptops and desktop computers will work provided an external microphone and camera are available. However, audio and video quality may vary depending on internet speed and use of a web browser other than Internet Explorer is required.)

JOIN THE INTERACTIVE MEETING

To log-in to the Webex session click on the below link:

<https://virginia-dhp.my.webex.com/virginia-dhp.my/j.php?MTID=m80a5c2616eef5ce502f72fd3e8e2228a>

To join by audio only:

Dial: 1-408-418-9388

When prompted enter access code/meeting number: 132 176 5765

When prompted enter password: 32279757

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
VIRTUAL VETERINARY ESTABLISHMENT INSPECTIONS COMMITTEE
MEETING MINUTES
December 17, 2020**

- TIME AND PLACE:** A virtual meeting via WebEx of the Veterinary Establishment Inspections Committee (Committee) was called to order at 2:08 p.m.
- PRESIDING OFFICER:** Tregel Cockburn, DVM, Committee Chair (Virtual Participation)
- COMMITTEE MEMBERS PARTICIPATING VIRTUALLY:** Jason Bollenbeck, DVM, Virginia Veterinary Medical Association of Virginia
Bayard Rucker, DVM, Board Member
Taryn Singleton, LVT
Wendy Ashworth, DHP Senior Inspector
- STAFF PARTICIPATING ONSITE:** Leslie L. Knachel, Executive Director
Kelli Moss, Deputy Executive Director
Amy Davis, Executive Assistant
Celia Wilson, Operations Administrative Assistant
Melanie Morton, Inspections Manager
- STAFF PARTICIPATING VIRTUALLY:** Kelly Gottschalk, Veterinary Board Review Coordinator
Elaine Yeatts, DHP Senior Policy Analyst
- ESTABLISHMENT OF QUORUM:** There were five committee members out of five present constituting a quorum for conducting the Committee's business.
- ORDERING OF AGENDA:** No changes were made to the agenda.
- PUBLIC COMMENT:** No public comment was received.
- APPROVAL OF MINUTES:** Dr. Bollenbeck moved to accept the minutes from the September 30, 2020 meeting as presented. The motion was properly seconded by Ms. Ashworth.

A roll call vote was taken by Ms. Knachel. The motion carried with a unanimous aye vote.
- DISCUSSION ITEMS:** **Veterinary Establishment Inspection Update**
Ms. Morton provided an overview of survey results provided in the agenda packet regarding the virtual inspection process. The survey indicated very positive feedback to the virtual inspection process.
- Working Draft of Guidance Document for Conducting and Responding to Routine Inspections**
Ms. Knachel reviewed the working draft document provided in the agenda packet and stated the goal is to finalize the document prior to the March 11, 2021 Board meeting. Discussion and suggestions were provided. The Committee requested that Ms. Knachel move forward with the changes to be reviewed at the next meeting of the Committee.
- Review of Frequent Inspection Violations**

Ms. Knachel asked Ms. Wilson to provide an overview of information regarding the most frequent inspection violations based on routine inspection data taken from 168 inspections during the time period of January 2020 through November 2020.

Ms. Knachel reviewed with the Committee the most frequent violations to determine if clarifying language was needed. The Committee offered recommendations to the regulations to increase compliance. In addition, she indicated that a monthly mass email highlighting a specific regulation could be sent starting in January.

NEW BUSINESS:

Drug Security

Ms. Moss stated drug security is a topic that should be focused on to reduce possible issues of public safety. She will work on a plan to increase education on this topic.

Next Meeting

Ms. Knachel informed the Committee a poll will be send by email to determine a date for the Committee to meet in February.

ADJOURNMENT:

The meeting adjourned at 4:03 p.m.

Tregel Cockburn, D.V.M.
Committee Chair

Leslie L. Knachel, M.P.H.
Executive Director

Date

Date

Virginia Board of Veterinary Medicine

Ambulatory Mobile Service Establishments – Change of Location without Inspection

Question: Is an inspection required when an ambulatory mobile service establishment changes location?

Answer: The *Regulations Governing the Practice of Veterinary Medicine* states the following:

18VAC150-20-180. Requirements to be registered as a veterinary establishment.

A. Every veterinary establishment shall apply for registration on a form provided by the board and submit the application fee specified in 18VAC150-20-100. The board may issue a registration as a stationary or ambulatory establishment. Every veterinary establishment shall have a veterinarian-in-charge registered with the board in order to operate.

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 requesting a change in the establishment category listed on the registration.

Minutes from December 19, 1996, meeting and subsequent revisions on November 14, 2007 and October 24, 2017, reflect that the Board determined ambulatory mobile service establishment are allowed to change location without an inspection, but the establishment must inform the Board within 30 days if there is any change in the address of record pursuant to the following regulation:

18VAC150-20-30. Posting of licenses; accuracy of address.

B. It shall be the duty and responsibility of each licensee, registrant, and holder of a registration to operate a veterinary establishment to keep the board apprised at all times of his current address of record and the public address, if different from the address of record. All notices required by law or by this chapter to be mailed to any veterinarian, veterinary technician, registered equine dental technician, or holder of a registration to operate a veterinary establishment shall be validly given when mailed to the address of record furnished to the board pursuant to this regulation. All address changes shall be furnished to the board within 30 days of such change.

Virginia Board of Veterinary Medicine

**Guidance for
Disposition of Cases Involving Failure of Veterinarian-in-Charge to Notify Board of
Veterinary Establishment Closure**

Guidance

Q: What will the Board accept as notification of closure?

A: Notification must be in writing, and the Board must be notified 10 days prior to closure. Notification may be sent via email or mail. The [Veterinary Establishment Closure Form](#) is available to utilize to notify the Board of the closure of a veterinary establishment.

Board Action for Non-Compliance

The Board adopted the following guidelines for resolution of cases of non-compliance by a veterinarian-in-charge’s failure to provide prior notification to the Board of a veterinary establishment’s closure in accordance with 18VAC150-20-181:

Veterinarian-in-Charge

Cause	Possible Action
First offense: 90 days or less after closure	Advisory Letter
First offense: 91 days or more	Confidential Consent Agreement
Second offense	Consent Order; Reprimand

Applicable Law, Regulation and Guidance

Code of Virginia

§ 54.1-3804. Specific powers of Board.

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

3. To regulate, inspect, and register all establishments and premises where veterinary medicine is practiced.

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

A. No person licensed, registered, or certified by one of the health regulatory boards under the Department shall transfer records pertaining to a current patient in conjunction with the closure, sale or relocation of a professional practice until such person has first attempted to notify the patient of the pending transfer, by mail, at the patient's last known address, and by publishing prior notice in a newspaper of general circulation within the provider's practice area, as specified in § 8.01-324.

The notice shall specify that, at the written request of the patient or an authorized representative, the records or copies will be sent, within a reasonable time, to any other like-regulated provider of the patient's choice or provided to the patient pursuant to § 32.1-127.1:03. The notice shall also disclose whether any charges will be billed by the provider for supplying the patient or the provider chosen by the patient with the originals or copies of the patient's records. Such charges shall not exceed the actual costs of copying and mailing or delivering the records.

B. For the purposes of this section:

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

"Relocation of a professional practice" means the moving of a practice located in Virginia from the location at which the records are stored at the time of the notice to another practice site that is located more than 30 miles away or to another practice site that is located in another state or the District of Columbia.

Regulations Governing the Practice of Veterinary Medicine

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

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

- 1. Regularly being on site as necessary to provide routine oversight to the veterinary establishment for patient safety and compliance with law and regulation.*
- 2. Maintaining the facility within the standards set forth by this chapter.*
- 3. Performing the biennial controlled substance inventory and ensuring compliance at the facility with any federal or state law relating to controlled substances as defined in § 54.1-3404 of the Code of Virginia. The performance of the biennial inventory may be delegated to another licensee, provided the veterinarian-in-charge signs the inventory and remains responsible for its content and accuracy.*
- 4. Notifying the board in writing of the closure of the registered facility 10 days prior to closure.*
- 5. Notifying the board immediately if no longer acting as the veterinarian-in-charge.*
- 6. Ensuring the establishment maintains a current and valid registration issued by the board.*

B. Upon any change in veterinarian-in-charge, these procedures shall be followed:

- 1. The veterinarian-in-charge registered with the board remains responsible for the establishment and the stock of controlled substances until a new veterinarian-in-charge is registered or for five days, whichever occurs sooner.*
- 2. An application for a new registration, naming the new veterinarian-in-charge, shall be made five days prior to the change of the veterinarian-in-charge. If no prior notice was given by the previous veterinarian-in-charge, an application for a new registration naming a new*

veterinarian-in-charge shall be filed as soon as possible, but no more than 10 days, after the change.

3. The previous establishment registration is void on the date of the change of veterinarian-in-charge and shall be returned by the former veterinarian-in-charge to the board five days following the date of change.

4. Prior to the opening of the business, on the date of the change of veterinarian-in-charge, the new veterinarian-in-charge shall take a complete inventory of all Schedules II through V drugs on hand. He shall date and sign the inventory and maintain it on premises for three years. That inventory may be designated as the official biennial controlled substance inventory.

C. Prior to the sale or closure of a veterinary establishment, the veterinarian-in-charge shall:

1. Follow the requirements for transfer of patient records to another location in accordance with § 54.1-2405 of the Code of Virginia; and

2. If there is no transfer of records upon sale or closure of an establishment, the veterinarian-in-charge shall provide to the board information about the location of or access to patient records and the disposition of all scheduled drugs.

Virginia Board of Veterinary Medicine

Veterinary Establishments

1. Are veterinary establishments required to be registered with the Board?

Yes, veterinary medicine may only be practiced out of a registered stationary or ambulatory veterinary establishment.

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

18VAC150-20-180. Requirements to be registered as a veterinary establishment.

A. Every veterinary establishment shall apply for registration on a form provided by the board and submit the application fee specified in 18VAC150-20-100. The board may issue a registration as a stationary or ambulatory establishment. Every veterinary establishment shall have a veterinarian-in-charge registered with the board in order to operate.

1. Veterinary medicine may only be practiced out of a registered establishment except in emergency situations or in limited specialized practices as provided in 18VAC150-20-171. The injection of a microchip for identification purposes shall only be performed in a veterinary establishment, except personnel of public or private animal shelters may inject animals while in their possession.

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 requesting a change in the establishment category listed on the registration.

3. Any addition or renovation of a stationary establishment or an ambulatory establishment that involves changes to the structure or composition of a surgery room shall require reinspection by the board and payment of the required fee prior to use.

2. What types of veterinary establishments may be registered?

[Regulations Governing the Practice of Veterinary Medicine](#) define a veterinary establishment to be the following:

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.

To review the regulations for each veterinary establishment type, go to:

[Stationary Veterinary Establishments](#)

[Ambulatory veterinary establishments](#)

3. Who may own a veterinary establishment?

The laws and regulations are silent as to who may own a veterinary establishment. The Board does not collect or maintain information on ownership of a veterinary establishment.

4. How does an individual or a business entity apply for a veterinary establishment registration?

Complete the [Application and Change Request for a Veterinary Establishment](#) form and submit with required fee to the Board by postal mail.

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

18VAC150-20-180. Requirements to be registered as a veterinary establishment.

B. A veterinary establishment 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 where applicable. If, during a new or routine inspection, violations or deficiencies are found necessitating a reinspection, the prescribed reinspection fee will be levied. Failure to pay the fee shall be deemed unprofessional conduct and, until paid, the establishment shall be deemed to be unregistered.

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 registration fee has been paid.

5. May two veterinary establishments share the same space?

Each veterinary practice sharing the same space must have its own registration. However, a stationary establishment may have an ambulatory component to the practice without maintaining separate registrations.

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

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

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

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

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

6. What are the inspection requirements for a new or existing veterinary establishment?

Prior to Opening a New Veterinary Establishment

A new veterinary establishment, stationary or ambulatory, must be inspected and issued a registration prior to opening. Submission of an application is not sufficient to begin providing services.

Complete [Application and Change Request for a Veterinary Establishment](#) form and submit with required fee at least 45 days in advance to ensure an inspection can be completed prior to desired opening date. Upon the Board's receipt, a veterinary establishment application is forwarded to the assigned inspector. The inspector will contact the applicant to schedule an inspection appointment. The inspector determines whether the inspection will occur virtually or in-person.

Change of Location

Stationary Establishments

Complete [Application and Change Request for a Veterinary Establishment](#) form and submit with required fee at least 45 days in advance to ensure an inspection can be completed prior to desired opening date at the new location. Upon the Board's receipt, a veterinary establishment application is forwarded to the assigned inspector. The inspector will contact the applicant to schedule an inspection appointment. The inspector determines whether the inspection will occur virtually or in-person.

Ambulatory

Complete [Application and Change Request for a Veterinary Establishment](#) form and submit. No inspection or fee is required for an ambulatory veterinary establishment to change location.

Minutes from the December 19, 1996, board meeting and subsequent revisions on November 14, 2007 and October 24, 2017, reflect that the Board determined an ambulatory veterinary establishments is allowed to change location without an inspection, but the establishment must inform the Board within 30 days if there is any change in the address of record pursuant to the [Regulations Governing the Practice of Veterinary Medicine](#) which state the following: [comment to be deleted – if this guidance document is adopted by the Board and becomes effective, [150-6 Ambulatory Mobile Service Establishments – Change of Location without Inspection](#) may be deleted as the information in the guidance document is covered above.]

18VAC150-20-30. Posting of licenses; accuracy of address.

B. It shall be the duty and responsibility of each licensee, registrant, and holder of a registration to operate a veterinary establishment to keep the board apprised at all times of his current address of record and the public address, if different from the address of record. All notices required by law or by this chapter to be mailed to any veterinarian, veterinary technician, registered equine dental technician, or holder of a registration to operate a veterinary establishment shall be validly given when mailed to the address of record furnished to the board pursuant to this regulation. All address changes shall be furnished to the board within 30 days of such change.

Prior to Use of a New or Remodeled Surgical Suite

Complete [Application and Change Request for a Veterinary Establishment](#) form and submit with required fee at least 45 days in advance to ensure an inspection can be completed prior to desired use of the new or remodeled surgical unit. Upon the Board's receipt, a veterinary establishment application is forwarded to the assigned inspector. The

inspector will contact the applicant to schedule the inspection appointment. The inspector determines whether the inspection will occur virtually or in-person.

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

18VAC150-20-180. Requirements to be registered as a veterinary establishment.

A. Every veterinary establishment shall apply for registration on a form provided by the board and submit the application fee specified in 18VAC150-20-100. The board may issue a registration as a stationary or ambulatory establishment. Every veterinary establishment shall have a veterinarian-in-charge registered with the board in order to operate...

3. Any addition or renovation of a stationary establishment or an ambulatory establishment that involves changes to the structure or composition of a surgery room shall require reinspection by the board and payment of the required fee prior to use.

Routine Inspections

Inspections of stationary and ambulatory veterinary establishments occur on a routine basis approximately every three years. The inspection cycle may vary based on the number of deficiencies found during an inspection. For more information, please review Guidance Document [150-15 Disposition of routine inspection violations](#)

Discipline/Compliance Related

An inspection occurring as the result of a disciplinary or compliance case, will have an associated Board Order which will determine the time for the inspection.

Change in Ownership

If the name of the veterinary establishment remains the same, there is no notification or inspection requirement.

Change in Veterinarian-in-Charge

Complete the [Change in Veterinarian-in-Charge](#) form and submit with required fee via postal mail. There is no inspection requirement.

7. What are the responsibilities of a veterinarian-in-charge?

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

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

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

- 1. Regularly being on site as necessary to provide routine oversight to the veterinary establishment for patient safety and compliance with law and regulation.*
- 2. Maintaining the facility within the standards set forth by this chapter.*
- 3. Performing the biennial controlled substance inventory and ensuring compliance at the facility with any federal or state law relating to controlled substances as defined in § 54.1-3404 of the Code of Virginia. The performance of the biennial inventory may be delegated to another*

licensee, provided the veterinarian-in-charge signs the inventory and remains responsible for its content and accuracy.

- 4. Notifying the board in writing of the closure of the registered facility 10 days prior to closure.*
- 5. Notifying the board immediately if no longer acting as the veterinarian-in-charge.*
- 6. Ensuring the establishment maintains a current and valid registration issued by the board.*

B. Upon any change in veterinarian-in-charge, these procedures shall be followed:

- 1. The veterinarian-in-charge registered with the board remains responsible for the establishment and the stock of controlled substances until a new veterinarian-in-charge is registered or for five days, whichever occurs sooner.*
- 2. An application for a new registration, naming the new veterinarian-in-charge, shall be made five days prior to the change of the veterinarian-in-charge. If no prior notice was given by the previous veterinarian-in-charge, an application for a new registration naming a new veterinarian-in-charge shall be filed as soon as possible, but no more than 10 days, after the change.*
- 3. The previous establishment registration is void on the date of the change of veterinarian-in-charge and shall be returned by the former veterinarian-in-charge to the board five days following the date of change.*
- 4. Prior to the opening of the business, on the date of the change of veterinarian-in-charge, the new veterinarian-in-charge shall take a complete inventory of all Schedules II through V drugs on hand. He shall date and sign the inventory and maintain it on premises for three years. That inventory may be designated as the official biennial controlled substance inventory.*

C. Prior to the sale or closure of a veterinary establishment, the veterinarian-in-charge shall:

- 1. Follow the requirements for transfer of patient records to another location in accordance with § 54.1-2405 of the Code of Virginia; and*
- 2. If there is no transfer of records upon sale or closure of an establishment, the veterinarian-in-charge shall provide to the board information about the location of or access to patient records and the disposition of all scheduled drugs.*

8. Will an inspection proceed if the veterinarian-in-charge is not in the veterinary establishment?

There is no requirement for the veterinarian-in-charge to be present during an inspection. Per the regulations, an authorized person must be available to access Scheduled II – V Controlled Substances. The veterinary establishment and veterinarian-in-charge may be subject to disciplinary action if the inspector is denied access to the veterinary establishment to conduct the inspection. [Regulations Governing the Practice of Veterinary Medicine](#) state the following:

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

D. All veterinary establishments shall maintain drugs in a secure manner with precaution taken to prevent theft or diversion. Only the veterinarian, veterinary technician, pharmacist, or pharmacy technician shall have access to Schedules II through V drugs, with the exception provided in subdivision 6 of this subsection.

6. *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.*

18VAC150-20-210. Revocation or suspension of a veterinary establishment registration.

The board may revoke or suspend or take other disciplinary action deemed appropriate against the registration of a veterinary establishment if it finds the establishment to be in violation of any provision of laws or regulations governing veterinary medicine or if:

1. *The board or its agents are denied access to the establishment to conduct an inspection or investigation;*

9. How may a veterinary establishment conduct a self-evaluation inspection to determine its compliance with the regulatory requirements?

The [Veterinary Establishment Inspection Report](#) form is available for use in conducting a self-evaluation inspection.

10. Where may a veterinarian-in-charge find information on controlled substances and the Prescription Monitoring Program?

Please review the following guidance documents

- [150-13](#) **Controlled Substances (Schedule II-VI) in Veterinary Practice**
- [150-21](#) **Frequently asked questions about reporting to the Prescription Monitoring Program**

11. What is a veterinary establishment required to do if deficiencies are found during an inspection?

Regardless of the type of inspection, the veterinarian-in-charge is responsible for ensuring the submission of written responses to *all* deficiencies noted on the Inspection Summary detailing the steps taken to correct each deficiency within 14 days. Failure to respond may result in disciplinary action. [Regulations Governing the Practice of Veterinary Medicine](#) state the following:

18VAC150-20-140. Unprofessional conduct.

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

18. *Failure to submit evidence of correction resulting from a violation noted in an inspection or reported by another agency within 14 days, unless an extension is granted by the board.*

Some deficiencies require *Proof of Corrective Action* which will be identified on the inspection report, unless they have been corrected on-site and noted by the inspector on the report. *Proof of Correction Action* can take the form of pictures, documents, receipts for purchases, or documentation that demonstrates corrective steps have been taken. *Proof of Corrective Action* may be submitted by email, fax, or postal carrier.

Initial and Prior to Use of a New or Remodeled Surgical Suite Inspections

Written responses or *Proof of Corrective Action* (as noted on the inspection report) for all deficiencies must be documented prior to the issuance of the initial veterinary establishment registration or use of a new or remodeled surgical suite.

Routine and Discipline/Compliance Related Inspections

Written responses or *Proof of Corrective Action* (as noted on the inspection report) must be documented and received by the Board within 14 days, unless an extension is granted by the Board. To request an extension, send request via one of the following methods:

- Email: vetbd@dhp.virginia.gov
 - Subject line: Correction Action Extension for [Name of Veterinary Establishment]
 - Body of email include: Facility, Registration number, Type of Inspection and reason for extension request
- Fax: (804) 527-4471
- Mail: Board of Veterinary Medicine, 9960 Mayland Drive, Suite 300, Henrico, VA 23233-1463

The inspection report and summary of deficiencies are two separate documents that are sent to the veterinary establishment via email after the inspection is completed. The summary of deficiencies may be electronically completed and submitted.

Steps taken to correct inspection deficiencies may be submitted to the Board of Veterinary Medicine via one of the following methods:

- Email: vetbd@dhp.virginia.gov
- Fax: (804) 527-4471
- Mail: Board of Veterinary Medicine, 9960 Mayland Drive, Suite 300, Henrico, VA 23233-1463

If submitting documents via email (see example below):

- On subject line include:
 - Facility, Registration number, Type of Inspection
- Body of email include:
 - Purpose (e.g. Submitting responses to inspection deficiency)
 - Any questions or concerns
- Attachments:
 - Inspection Summary/Written Response to *all* deficiencies
 - *Proof of Corrective Action* for the deficiencies that require additional documentation

To: vetboard@dhp.virginia.gov

Subject: Facility Name, Registration Number and Type of Inspection

Content: Attached are the [written responses and/or Proof of Correction Action] for the deficiencies noted during the inspection at [veterinary establishment name] conducted on [date of inspection].

Signature

Contact Phone Number

12. What type of board action may be taken against a veterinarian-in-charge and veterinary establishment for deficiencies found during a routine inspection?

Guidance Document [150-15 Disposition of routine inspection violation](#) provides information for both the veterinarian-in-charge and the veterinary establishment on board actions related to routine inspections.

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

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

1. *Regularly being on site as necessary to provide routine oversight to the veterinary establishment for patient safety and compliance with law and regulation.*
2. *Maintaining the facility within the standards set forth by this chapter.*

18VAC150-20-210. Revocation or suspension of a veterinary establishment registration.

The board may revoke or suspend or take other disciplinary action deemed appropriate against the registration of a veterinary establishment if it finds the establishment to be in violation of any provision of laws or regulations governing veterinary medicine or if:

1. *The board or its agents are denied access to the establishment to conduct an inspection or investigation;*
2. *The holder of a registration does not pay any and all prescribed fees or monetary penalties;*
3. *The establishment is performing procedures beyond the scope of a limited stationary establishment registration; or*
4. *The establishment has no veterinarian-in-charge registered with the board.*

13. What is the process for closing a veterinary establishment?

Complete the [Notification for Closure of Veterinary Establishment](#) and submit to the Board via fax, email or postal mail.

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

C. *Prior to the sale or closure of a veterinary establishment, the veterinarian-in-charge shall:*

- 1. Follow the requirements for transfer of patient records to another location in accordance with § 54.1-2405 of the Code of Virginia; and*
- 2. If there is no transfer of records upon sale or closure of an establishment, the veterinarian-in-charge shall provide to the board information about the location of or access to patient records and the disposition of all scheduled drugs.*

Working Draft 02.19.21



Virginia Board of Veterinary Medicine

9960 Mayland Drive, Suite 300
Henrico, VA 23233

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

Main: 804.367.4468
Fax: 804.527.4471

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

Key			
C= Compliant	NC= Non Compliant	NC-R= Non Compliant Repeat Violation	NA= Not Applicable

Licenses and Registrations - All Establishments

Result

Notes

1	<p>18VAC150-20-30(A)</p> <p>All licenses and registrations issued by the board shall be posted in a place conspicuous to the public or available at the establishment where veterinary services are being provided. Licensees who do relief work in an establishment shall carry a license with them or post at the establishment. Ambulatory veterinary practices that do not have an office accessible to the public shall carry their licenses and registrations in their vehicles.</p> <p><u>Guidance:</u> A license or registration is considered to be in a "place conspicuous to the public" when it is hung in an area that is easily accessed by the public for review . The original license or registration (not a photocopy) should be posted or available for inspection. Duplicate copies of a license can be obtained through the Board of Veterinary Medicine's offices for a small fee.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written response
2	<p>§ 54.1-3805</p> <p>No person shall practice veterinary medicine or as a veterinary technician in this Commonwealth unless such person has been licensed by the Board.</p> <p><u>Violation:</u> Major - 5 points</p>		Written response
3	<p>18VAC150-20-70(A)</p> <p>Failure to renew an individual license shall cause a license to lapse and become invalid, and practice with a lapsed license may subject the licensee to disciplinary action by the board.</p> <p><u>Guidance:</u> All individual licenses must be current. An expired license will be reported as a violation and documentation of practicing without a valid license will be obtained.</p> <p><u>Violation:</u> Major - 5 points</p>		Written response
4	<p>18VAC150-20-185(B)</p> <p>All veterinary establishment registrations are current. Failure to renew a veterinary establishment permit shall cause the permit to lapse and become invalid.</p> <p><u>Guidance:</u> An expired registration will be reported as a violation and documentation of practicing without a valid registration will be obtained. Reinspection required after registration has been expired for more than 30 days.</p> <p><u>Violation:</u> Major - 5 points</p>		Written response

Veterinarian-in-Charge (VIC)		Result	Notes
5	<p>18VAC150-20-180(A)</p> <p>Every veterinary establishment shall have a veterinarian-in-charge (VIC) who is registered with the Board in order to operate.</p> <p><u>Guidance:</u> When there is a change in the VIC, an application for a new permit, naming the new veterinarian-in-charge, shall be made five days prior to the change of the veterinarian-in-charge. If no prior notice was given by the previous veterinarian-in-charge, an application for a new permit naming a new veterinarian-in-charge shall be filed as soon as possible but no more than 10 days after the change. Days are counted as calendar days.</p> <p><u>Violation:</u> Major - 5 points</p>		Proof of Correction Action
6	<p>18VAC150-20-181(A)(1)</p> <p>Veterinarian-in-Charge is responsible for regularly being on site as necessary to provide routine oversight to the veterinary establishment for patient safety and compliance with law and regulation.</p> <p><u>Violation:</u> Major - 5 points</p>		Written response
7	<p>18VAC150-20-181(B)(4)</p> <p>Prior to opening of the business, on the date of the change of VIC, the new VIC shall take a complete inventory of all Schedules II through V drugs on hand. He shall date and sign the inventory and maintain it on premises for three years. That inventory may be designated as the official biennial controlled substance inventory.</p> <p><u>Violation:</u> Major - 5 points</p>		Written response
Requirements for drug storage, dispensing, destruction, and records for all veterinary establishments.		Result	Notes
8	<p>18VAC150-20-190(A)</p> <p>All drugs shall be maintained, administered, dispensed, prescribed and destroyed in compliance with state and federal laws, which include § 54.1-3303 of the Code of Virginia, the Drug Control Act (§ 54.1-3400 et seq. of the Code of Virginia), applicable parts of the federal Food, Drug, and Cosmetic Control Act (21 USC § 301 et seq.), the Prescription Drug Marketing Act (21 USC § 301 et seq.), and the Controlled Substances Act (21 § 801 et seq.) as well as applicable portions of Title 21 of the Code of Federal Regulations.</p> <p><u>Guidance:</u> This regulation incorporates by reference all applicable laws and regulations related to drug storage, dispensing, destruction, and records. It is not cited as a violation if there is a specific violation identified in this section of the inspection report form.</p> <p><u>Violation:</u> Major - 5 points</p>		Proof of Correction Action

9	18VAC150-20-190(B) § 54.1-3461 § 54.1-3462	Written response
	Repackaged tablets and capsules dispensed for companion animals are in approved safety closure containers, except safety caps are not required when medication cannot be reasonably dispensed in such containers. A client requesting non-safety packaging shall be documented in the patient record.	
	<u>Guidance:</u> When drugs are taken from a stock bottle and put into another container at the time of dispensing, the drugs are considered to be repackaged. As provided in § 54.1-3300, the definition of “dispense” means to deliver a drug to an ultimate user or research subject by or pursuant to the lawful order of a practitioner, including the prescribing and administering, packaging, labeling or compounding necessary to prepare the substance for delivery.	
	<u>Violation:</u> Minor - 1 point	
10	18VAC150-20-190(C) § 54.1-3410	Proof of Correction Action
	All drugs dispensed for companion animals shall be labeled with the following: <ol style="list-style-type: none"> 1. Name and address of the facility; 2. First and last name of owner; 3. Animal identification and species; 4. Date dispensed; 5. Directions for use; 6. Name, strength (if more than one dosage form exists) and quantity of the drug; and 7. Name of the prescribing veterinarian. 	
	<u>Guidance:</u> For drugs that do not have a pharmaceutical insert, consider providing information to clients about drug reactions, interactions and side effects. An uninformed client may receive misinformation from friends or the internet regarding a drug.	
	<u>Violation:</u> Major - 5 points for no label; or 2 points for an incomplete label.	

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

13	<p>18VAC150-20-190(D)(2)</p> <p>The establishment may also have a working stock of Schedules II through V drugs that shall be kept in (i) a securely locked container, cabinet, or safe when not in use or (ii) direct possession of a veterinarian or veterinary technician. A working stock shall consist of only those drugs that are necessary for use during a normal business day or 24 hours, whichever is less.</p> <p><u>Guidance:</u> Working stock that is in use during a procedure or treatment must remain within eyesight and supervision of a veterinarian or veterinary technician at all times.</p> <p><u>Violation:</u> Major - 5 points</p>	Written response
14	<p>18VAC150-20-190(D)(3)</p> <p>Whenever the establishment is closed, all general and working stock of Schedules II through V drugs and any dispensed prescriptions that were not delivered during normal business hours shall be securely stored as required for the general stock.</p> <p><u>Violation:</u> Major - 5 points</p>	Written response
15	<p>18VAC150-20-190(D)(4)</p> <p>Prescriptions that have been dispensed and prepared for delivery shall be maintained under lock or in an area that is not readily accessible to the public and may be delivered to an owner by an unlicensed person, as designated by the veterinarian.</p> <p><u>Violation:</u> Major - 5 points</p>	Written response

16	<p>18VAC150-20-190(D)(5) § 54.1-3404(E)</p> <p>Whenever a theft of or any unusual loss of Schedule II through V drugs is discovered the VIC, or in his absence, his designee, shall immediately report such theft or loss to the Board of Veterinary Medicine and the Board of Pharmacy and to the DEA. The report to the boards shall be in writing and sent electronically or by regular mail. The report the DEA shall be in accordance with 21 CFR 1301.76(b). If the VIC is unable to determine the exact kind and quantity of the drug loss, he shall immediately take a complete inventory of all Schedules II through V drugs.</p> <p><u>Guidance:</u> Whenever a theft or any other unusual loss of a controlled substance is discovered, the veterinarian-in-charge is required by state and federal laws and/or regulations to immediately report such theft or loss to all of the following:</p> <ol style="list-style-type: none"> 1. Virginia Board of Veterinary Medicine; 2. Virginia Board of Pharmacy; and 3. U.S. Drug Enforcement Administration. <p>The Boards of Veterinary Medicine and Pharmacy request written notification sent via email or letter. The Board of Veterinary Medicine recommends contacting local law enforcement. Reports to the DEA must be made in accordance with 21 C.F.R. § 1301.76(b).</p> <p><u>Violation:</u> Major - 3 points</p>	Written response
17	<p>18VAC150-20-190(E)</p> <p>Schedules II through V shall be destroyed by (i) transferring the drugs to another entity authorized to possess or provide for proper disposal of such drugs or (ii) destroying the drugs in compliance with applicable local, state and federal laws and regulations. If Schedules II through V drugs are to be destroyed, a DEA drug destruction form shall be fully completed and used as the record of all drugs to be destroyed. A copy of the destruction form shall be retained at the veterinary practice site with other inventory records.</p> <p><u>Guidance:</u> Inspectors will verify that Schedule II, III, IV and V drugs are properly destroyed in accordance with DEA requirements available at http://www.deadiversion.usdoj.gov/drug_disposal/index.html</p> <p>Disposal of Controlled Substances</p> <p>A practitioner may dispose of out-of-date, damaged, or otherwise unusable or unwanted controlled substances, including samples, by transferring them to a registrant who is authorized to receive such materials. These registrants are referred to as "Reverse Distributors." The practitioner should contact the local DEA field office for a list of authorized Reverse Distributors. Schedule I and II controlled substances should be transferred via the DEA Form 222, while Schedule III–V compounds may be transferred via invoice. The practitioner should maintain copies of the records documenting the transfer and disposal of controlled substances for a period of two years. It is recommended that Schedule VI drugs be destroyed in the same manner as Schedule III-V drugs. Expired drugs may be considered adulterated drugs, may not be transferred or donated, and must be destroyed as required by federal/state laws and regulations.</p> <p><u>Violation:</u> Major - 2 points</p>	Written response

18	18VAC150-20-190(F)		Written response
<p>The drug storage area has appropriate provision for temperature control for all drugs and biologics. If drugs requiring refrigeration are maintained at the facility, they shall be kept in a refrigerator with interior thermometer maintained between 36°F and 46°F. If a refrigerated drug is in Schedules II through V, the drug shall be kept in a locked container secured to the refrigerator, or the refrigerator shall be locked. Drugs stored at room temperature are maintained between 59°F and 86°F.</p> <p><u>Violation:</u> Major - 5 points</p>			
19	18VAC150-20-190(G)		Written response
<p>The stock of drugs shall be reviewed frequently, and expired drugs shall be removed from the working stock of drugs at the expiration date and shall not be administered or dispensed.</p> <p><u>Guidance:</u> The expiration date on all drugs, including prepackaged stock, should be regularly checked and drugs that are expired shall be separated from working stock. A drug expires on the month, day and year listed on the container. If only a month and year are provided, drug expires on the last day of the month listed on container.</p> <p>Pursuant to the Code of Virginia, § 54.1-3401 defines “drug” to mean (i) articles or substances recognized in the official United States Pharmacopoeia National Formulary or official Homeopathic Pharmacopoeia of the United States, or any supplement to any of them; (ii) articles or substances intended for use in the diagnosis, cure, mitigation, treatment, or prevention of disease in man or animals; (iii) articles or substances, other than food, intended to affect the structure or any function of the body of man or animals; (iv) articles or substances intended for use as a component of any article specified in clause (i), (ii), or (iii); or (v) a biological product. A vaccine is considered to be a drug and should be removed from working stock once expired.</p> <p><u>Violation:</u> Major - 5 points for 6 or more expired drugs; or 4 points for 1-5 drugs expired 60 days or more; or 3 points for 1-5 drugs expired less than 60 days. If expired drugs are found in both less than 60 days or more than 60 day categories, the higher point value of 4 is assigned.</p>			

20	<p>18VAC150-20-190(H) § 54.1-3404</p> <p>A distribution record shall be maintained in addition to the patient’s record, in chronological order, for the administering and dispensing of Schedules II through V drugs. The distribution record shall include the following:</p> <ol style="list-style-type: none"> 1. Date of transaction. 2. Drug name, strength, and the amount dispensed, administered and wasted. 3. Owner and animal identification; and 4. Identification of the veterinarian authorizing the administration or dispensing of the drug. <p><u>Guidance:</u> The veterinarian’s initials are acceptable to meet the requirement of “identification of the veterinarian.”</p> <p>When a veterinarian with a veterinary establishment registration uses the surgery facilities of another veterinary establishment, the drug distribution log(s) must clearly show whose controlled substances were used for what purpose. If the facility’s stock is used, the hospital log must show that the surgery was performed by a visiting veterinarian who has the patient record and a record of administration shall be maintained at the facility. If the visiting veterinarian uses his own stock of drugs, he must make entries in his own log and patient records and shall leave a copy of the record at the veterinary establishment where the surgery was performed.</p> <p><u>Violation:</u> Major - 5 points for no record; or 3 points for incomplete record or records not maintained in chronological order.</p>	Proof of Correction Action
21	<p>18VAC150-20-190(I) § 54.1-3404</p> <p>Original invoices for all Schedules II through V drugs received shall be maintained in chronological order on the premises where the stock of drugs is held and the actual date of receipt shall be noted. All drug records shall be maintained for a period of three years from the date of transaction.</p> <p><u>Guidance:</u> The original invoices, not copies, need to be filed in chronological order. Do not file the invoices by supplier, by drug or any other filing method other than in chronological order.</p> <p><u>Violation:</u> Major - 5 points for no record; or 3 points for an incomplete record or a record not maintained for three years.</p>	Written response
22	<p>18VAC150-20-190(J) § 54.1-3404</p> <p>A complete and accurate inventory of all Schedules II through V drugs shall be taken, dated, and signed on any date which is within two years of the previous biennial inventory.</p> <p>The biennial inventory:</p> <ol style="list-style-type: none"> 1. Must have the drug strength specified. 2. Shall indicate if it was taken at the opening or closing of business. 3. Shall be maintained on premises where the drugs are held for two years from the date of taking the inventory. 	Written response

	<p><u>Guidance:</u> The inventory must be taken on any date which is within two year of the previous inventory, but may be taken more often. The purpose of indicating whether the biennial inventory was taken at the opening or closing of business is to determine whether the drugs received or used on the day of the inventory should be counted, if a drug audit is conducted. Expired Schedule II through V drugs that are removed from working stock but still on premises during a biennial inventory must be counted. The performance of the biennial inventory may be delegated to another licensee, provided the VIC signs and dates the inventory and remains responsible for its content and accuracy.</p> <p><u>Violation:</u> Major - 5 points if inventory not done within two years of the previous inventory and/or is missing required information; or 3 points if the inventory is only missing required information.</p>		
23	<p>18VAC150-20-190(K)</p> <p>Inventories and records, including original invoices, of Schedule II drugs shall be maintained separately from all other records, and the establishment shall maintain a continuous inventory of all Schedule II drugs received, administered, or dispensed, with reconciliation at least monthly. Reconciliation requires an explanation noted on the inventory for any difference between the actual physical count and the theoretical count indicated by the distribution records. A continuous inventory shall accurately indicate the physical count of each Schedule II drug in the general and working stocks at the time of performing the inventory.</p> <p><u>Violation:</u> Major - 5 points if inventory not done monthly and/or is missing required information; or 3 points if the inventory is only missing required information.</p>		Written response
24	<p>18VAC150-20-190(L)</p> <p>Every veterinary establishment licensed by the Board of Veterinary Medicine shall maintain records of the dispensing of feline buprenorphine and canine butorphanol, reconcile such records monthly, and make such records available for inspection upon request.</p> <p><u>Violation:</u> Major - 5 points for no record; or 3 points for incomplete record(s). Requirement for the dispensing records is new; non-compliance will be noted, but no violation will be cited for failure to maintain the required records until July 1, 2020.</p>		Written response
25	<p>18VAC150-20-190(N)</p> <p>If a limited stationary or ambulatory practice uses the facilities of another veterinary establishment, the drug distribution log shall clearly reveal whose Schedules II through V drugs were used. If the establishment's drug stock is used, the distribution record shall show that the procedure was performed by a visiting veterinarians who has the patient record. If the visiting veterinarian uses his own stock of drugs, he shall make entries in his own distribution record and in the patient record and shall leave a copy of the patient record at the other establishment.</p> <p><u>Violation:</u> Major - 5 points for no record; or 3 points for incomplete record(s).</p>		Written response

Bulk Reconstitution of Injectable, Bulk Compounding or Prepackaging		Result	Notes
26	<p>18VAC150-20-190(M)</p> <p>Veterinary establishments in which bulk reconstitution of injectable, bulk compounding or the prepackaging of drugs is performed shall maintain adequate control records for a period of one year or until the expiration, whichever is greater.</p> <p>Reconstitution, compounding and prepackaging records shall show the following:</p> <ol style="list-style-type: none"> 1. Name of the drugs used; 2. Strength, if any; 3. Date repackaged; 4. Quantity prepared; 5. Initials of the veterinarian verifying the process; 6. Assigned lot or control number; 7. Manufacturer's or distributor's name and lot or control number; and 8. Expiration date. <p><u>Guidance:</u> When drugs are taken from a stock bottle and put into another container prior to prescribing in anticipation of future dispensing, the drugs are considered to be prepackaged. Dispensing, labeling and recordkeeping requirements must be followed when prepackaging drugs.</p> <p>Transferring drugs to another container can affect the stability of the product. Expiration dates play an important role in maintaining the stability of a drug. The expiration date for a drug prepackaged is the same as the original stock bottle or is one year from the date of transfer whichever is less. It is best practice to store drugs under conditions which meet the United States Pharmacopeia and the National Formulary (USP-NF) specifications or manufacturers' suggested storage for each drug.</p> <p><u>Violation:</u> Major - 2 points</p>		Written response
Patient/Medical Recordkeeping		Result	Notes
27	<p>18VAC150-20-200(A)(6)(f)</p> <p>All veterinary establishments must have storage for records.</p> <p><u>Violation:</u> Major - 2 points</p>		Written response

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

All Veterinary Establishments		Result	Notes
31	<p>18VAC150-20-130(C)</p> <p>When there is a veterinary preceptee or extern practicing in the establishment, the supervising veterinarian shall disclose such practice to owners. The disclosure shall be by signage clearly visible to the public or by inclusion on an informed consent form.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written response
All Stationary Veterinary Establishments		Result	Notes
32	<p>18VAC150-20-200(D)</p> <p>A separate establishment registration is required for separate practices that share the same location.</p> <p><u>Violation:</u> Major - 5 points</p>		Written response
Establishments Performing Surgery		Result	Notes
33	<p>18VAC150-20-200(A)(2)(c)</p> <p>The areas within the facility shall include a room that is reserved only for surgery and used for no other purpose.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written response
34	<p>18VAC150-20-200(A)(2)(c)(1)</p> <p>The surgery room shall have walls constructed of nonporous material and extending from the floor to ceiling.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action
35	<p>18VAC150-20-200(A)(2)(c)(2)</p> <p>The surgery room shall be of a size adequate to accommodate a surgical table, anesthesia support equipment, surgical supplies, and all personnel necessary for safe performance of the surgery.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action
36	<p>18VAC150-20-200(A)(2)(c)(3)</p> <p>The surgery room shall be kept so that storage in the surgery room shall be limited to items and equipment normally related to surgery and surgical procedures.</p> <p><u>Guidance:</u> Items that are not normally related to surgery may not be stored in the surgery room. Dentistry can include surgical procedures (for example: extractions, fistula repair, subgingival cleaning, etc.) Therefore, dental units may be stored and used in a surgery room.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action
37	<p>18VAC150-20-200(A)(2)(c)(4)</p> <p>The surgery room shall have a surgical table made of non-porous material.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action

38	<p>18VAC150-20-200(A)(2)(c)(5)</p> <p>The surgery room shall have surgical supplies, instruments, and equipment commensurate with the kind of services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action
39	<p>18VAC150-20-200(A)(2)(c)(6)</p> <p>The surgery room shall surgical and automatic emergency lighting to facilitate performance of procedures.</p> <p><u>Guidance:</u> Section 150-20-10 of the Regulations Governing the Practice of Veterinary Medicine defines “automatic emergency lighting” to mean lighting which is powered by battery, generator, or alternate power source other than electrical power, is activated automatically by electrical power failure, and provides sufficient light to complete surgery or to stabilize the animal until surgery can be continued or the animal moved to another establishment.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action
40	<p>18VAC150-20-200(A)(2)(c)(7)</p> <p>The surgery room for establishments that perform surgery on small animals, have a door to close off the surgery room from other areas of the practice.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action
41	<p>18VAC150-20-180(A)(3)</p> <p>Any addition or renovation of a stationary establishment or ambulatory establishment that involves changes to the structure or composition of a surgery room shall require reinspection by the board and payment of the required fee prior to use.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written response
Laboratory			Notes
42	<p>18VAC150-20-200(A)(3)</p> <p>The veterinary establishment shall have, at a minimum, proof of use of either in-house laboratory service or outside laboratory services for performing lab tests, consistent with appropriate professional care for the species being treated.</p> <p><u>Guidance:</u> Stationary facilities open 24 hours a day are required to have onsite laboratory services. For all other veterinary establishments which may opt to use an outside laboratory service, a letter, email, or invoice may serve as documentation for compliance purposes.</p> <p><u>Violation:</u> Major - 5 points</p>		Proof of Correction Action

Housing		Result	Notes
43	<p>18VAC150-20-200(A)(4)(a)</p> <p>For housing animals, the establishment shall provide an animal identification system at all times when housing an animal.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written response
44	<p>18VAC150-20-200(A)(4)(b)</p> <p>For housing animals, the establishment shall provide accommodations of appropriate size and construction to prevent residual contamination or injury.</p> <p><u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action
45	<p>18VAC150-20-200(A)(4)(c)</p> <p>For housing animals, the establishment shall provide accommodations allowing for the effective separation of contagious and noncontagious patients.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action
46	<p>18VAC150-20-200(A)(4)(d)</p> <p>For housing animals, the establishment shall provide exercise areas that provide and allow effective separation of animals or walking the animals at medically appropriate intervals.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written response
Radiology		Result	Notes
47	<p>18VAC150-20-200(A)(5)</p> <p>A veterinary establishment shall either have radiology service in-house or documentation of outside service for obtaining diagnostic-quality radiographs.</p> <p><u>Guidance:</u> Stationary facilities open 24 hours a day are required to have onsite radiology/imaging services. For all other veterinary establishments which may opt to use an outside radiology/imaging service, a letter, email, or invoice may serve as documentation for compliance purposes.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action

48	<p>18VAC150-20-200(A)(5)(a)</p> <p>If radiology is in-house, the establishment shall document that radiographic equipment complies with Part VI (12VAC5-481-1581 et seq.), Use of Diagnostic X-Rays in the Healing Arts, of the Virginia Radiation Protection Regulations of the Virginia Department of Health.</p> <p><u>Guidance:</u> Dental units are considered to be radiographic equipment.</p> <p><u>Violation:</u> Major - 5 points</p>		Proof of Correction Action
49	<p>18VAC150-20-200(A)(5)(b)</p> <p>If radiology is in-house, maintain and utilize lead aprons and gloves and individual radiation exposure badges for each employee exposed to radiographs.</p> <p><u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.</p> <p><u>Violation:</u> Major - 5 points</p>		Proof of Correction Action
Minimum Equipment		Notes	
50	<p>18VAC150-20-200(A)(6)(a)</p> <p>Minimum equipment in the establishment shall include an appropriate method of sterilizing instruments.</p> <p><u>Guidance:</u> Veterinary establishments must have an appropriate method of sterilizing instruments. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Proof of Correction Action
51	<p>18VAC150-20-200(A)(6)(b)</p> <p>Minimum equipment in the establishment shall include internal and external sterilization monitors.</p> <p><u>Guidance:</u> Veterinary establishments must have an appropriate method for internal and external sterilization monitoring. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written response
52	<p>18VAC150-20-200(A)(6)(c)</p> <p>Minimum equipment in the establishment shall include a stethoscope.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written response
53	<p>18VAC150-20-200(A)(6)(e)</p> <p>Minimum equipment in the establishment shall include adequate means of determining patient's weight.</p> <p><u>Guidance:</u> Veterinary establishments must have an appropriate method of determining a patient's weight. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>		Written response

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

6	<p>18VAC150-20-200(A)(1)(b)(3)</p> <p>There shall be on premises refrigeration exclusively for carcasses of companion animals that require storage for 24 hours or more.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Proof of Correction Action			
7	<p>18VAC150-20-200(A)(1)(c)</p> <p>Sanitary toilet and lavatory shall be available for personnel and owners.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Written response			
8	<p>18VAC150-20-200(A)(2)(a)</p> <p>The areas within the facility shall include a reception area separate from other designated rooms.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Proof of Correction Action			
9	<p>18VAC150-20-200(A)(2)(b)</p> <p>The areas within the facility shall include an examination room or rooms containing a table or tables with nonporous surfaces.</p> <p><u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Proof of Correction Action			
<table border="0" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Minimum Equipment</td> <td style="width: 20%;">Result</td> <td style="width: 20%;">Notes</td> </tr> </table>			Minimum Equipment	Result	Notes
Minimum Equipment	Result	Notes			
10	<p>18VAC150-20-200(A)(6)(d)</p> <p>Minimum equipment in the establishment shall include equipment for delivery of assisted ventilation appropriate to the species being treated, including endotracheal tubes.</p> <p><u>Guidance:</u> Ambulatory agricultural/equine and house call/proceduralist veterinary establishment are exempt from meeting the requirements for assisted ventilation. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Proof of Correction Action			

Stationary Veterinary Establishments - Open < 24 hours/day		Result	Notes
1	<p>18VAC150-20-200(B)(2) § 54.1-3806.1</p> <p>A stationary establishment that is not open to the public 24 hours a day shall have licensed personnel available during its advertised hours of operation and shall disclose to the public that the establishment does not have continuous staff, in compliance with § 54.1-3806.1 of the Code of Virginia.</p> <p><u>Guidance:</u> The Disclosure form cannot be printed on the front or back of another document. It can be smaller than a standard piece of paper.</p> <p><u>Violation:</u> 3 points for missing form; and/or 1 point if form not compliant.</p>		Written response
Buildings and Grounds		Result	Notes

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

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

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

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

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

Ambulatory Veterinary Establishments - Mobile Service

	18VAC150-20-201(C)		Written response
	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.		
	<u>Violation:</u> Major - 5 points		
Buildings and Grounds		Result	Notes
1	18VAC150-20-200(A)(1)		Written response
	Buildings and ground must be maintained to provide sanitary facilities for the care and medical well-being of patients.		
	<u>Violation:</u> Major - 2 points		
2	18VAC150-20-200(A)(1)(a)		Written response
	Temperature, ventilation, and lighting must be consistent with the medical well-being of patients.		
	<u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.		
	<u>Violation:</u> Minor - 1 point		
3	18VAC150-20-200(A)(1)(b)(1)		Written response
	There shall be on premises hot and cold running water of drinking quality, as defined by the Virginia Department of Health.		
	<u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.		
	<u>Violation:</u> Minor - 1 point		
4	18VAC150-20-200(A)(1)(b)(2)		Written response
	There shall be on premises an acceptable method of disposal of deceased animals, in accordance with any local ordinance or state and federal regulations.		
	<u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.		
	<u>Violation:</u> Minor - 1 point		

5	<p>18VAC150-20-200(A)(1)(b)(3)</p> <p>There shall be on premises refrigeration exclusively for carcasses of companion animals that require storage for 24 hours or more.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Proof of Correction Action
6	<p>18VAC150-20-200(A)(1)(c)</p> <p>Sanitary toilet and lavatory shall be available for personnel and owners.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Written response
7	<p>18VAC150-20-200(A)(2)(a)</p> <p>The areas within the facility shall include a reception area separate from other designated rooms.</p> <p><u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Proof of Correction Action
8	<p>18VAC150-20-200(A)(2)(b)</p> <p>The areas within the facility shall include an examination room or rooms containing a table or tables with nonporous surfaces.</p> <p><u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Proof of Correction Action
<p style="text-align: center;">Minimum Equipment Result Notes</p>		
9	<p>18VAC150-20-200(A)(6)(d)</p> <p>Minimum equipment in the establishment shall include equipment for delivery of assisted ventilation appropriate to the species being treated, including endotracheal tubes.</p> <p><u>Guidance:</u> Ambulatory agricultural/equine and house call/proceduralist veterinary establishment are exempt from meeting the requirements for assisted ventilation. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided.</p> <p><u>Violation:</u> Minor - 1 point</p>	Proof of Correction Action

Pictures

Veterinary Establishment:

Date:

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