

**September 10, 2019**  
**Training Room 2**  
**1:00 p.m.**

**Call to Order – Steve Karras, DVM**

- Welcome
- Emergency Egress Procedures

**Ordering of Agenda – Dr. Karras**

**Public Comment – Dr. Karras**

The Board will receive all public comment related to agenda items at this time. The Board will not receive comment on any regulatory process for which a public comment period has closed or any pending or closed complaint or disciplinary matter.

**Discussion Items – Leslie Knachel/Kelli Moss**

**Pages 2-28**

- Consideration of Possible Resolution of Case No. 197135
- Consideration of Possible Resolution of Case No. 194365
- Update of Guidance Document 76-21.2:1 Veterinary Establishment Inspection Report

**New Business – Dr. Karras**

**Next Meeting – October 31, 2019**

**Meeting Adjournment – Dr. Karras**

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



Virginia Department of  
**Health Professions**  
Board of Veterinary Medicine

## Virginia Board of Veterinary Medicine

**Veterinary Medicine**  
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**Draft**

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<b>Registration Number:</b>		<b>Inspection Type:</b>	
<b>Name of Veterinary Establishment:</b>		<b>Inspection Results:</b>	
<b>Address:</b>		<b>Inspection Date:</b>	
<b>City:</b>		<b>Inspection Start Time and End Time:</b>	
<b>State:</b>		<b>Inspection Inspector Name:</b>	
<b>Zip Code:</b>		<b>PHRF Reporting Status:</b>	
<b>Establishment Hours of Operations:</b>		<b>Stationary:</b>	
<b>Establishment Phone Number:</b>		<b>Ambulatory:</b>	
<b>Establishment Fax Number:</b>		<b>Number of Mobile Units:</b>	
<b>Establishment Website:</b>		<b>Inspection Emailed To (person):</b>	
<b>Establishment Email:</b>		<b>Inspection Emailed To (email address):</b>	
<b>Veterinary-in-Charge:</b>		<b>Inspector Comments Below:</b>	
<b>Veterinary-in-Charge License Number:</b>			
<b>Veterinary-in-Charge Phone Number:</b>			
<b>Veterinary-in-Charge Email:</b>			

**Licenses and Registrations - All Establishments**

**Notes**

**Result**

<p>1 <b>18VAC150-20-30(A)</b>          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.  <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.  <u>Violation:</u> Minor - 1 point</p>		
<p>2 <b>§ 54.1-3805</b>          No person shall practice veterinary medicine or as a veterinary technician in this Commonwealth unless such person has been licensed by the Board.  <u>Violation:</u> Major - 5 points</p>		
<p>3 <b>18VAC150-20-70(A)</b>          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.  <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.  <u>Violation:</u> Major - 5 points</p>		
<p>4 <b>18VAC150-20-185(B)</b>          All veterinary establishment registrations are current. Failure to renew a veterinary establishment permit shall cause the permit to lapse and become invalid.  <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.  <u>Violation:</u> Major - 5 points</p>		

**Veterinarian-in-Charge (VIC)**

**Result**

**Notes**

5	<p><b>18VAC150-20-180(A)</b>                  Every veterinary establishment shall have a veterinarian-in-charge (VIC) who is registered with the Board in order to operate.  <b>Guidance:</b> 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.  <b>Violation:</b> Major - 5 points</p>		
6	<p><b>18VAC150-20-181(A)(1)</b>                  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.  <b>Violation:</b> Major - 5 points</p>		
7	<p><b>18VAC150-20-181(A)(4)</b>                  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.  <b>Violation:</b> Major - 5 points</p>		

**Requirements for drug storage, dispensing, destruction, and records for all veterinary establishments.**

**Result**

**Notes**

8	<p><b>18VAC150-20-190(A)</b>                  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.  <b>Guidance:</b> 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.  <b>Violation:</b> Major - 5 points</p>		
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<p>9 <b>18VAC150-20-190(B)</b>  <b>§ 54.1-3461</b>  <b>§ 54.1-3462</b></p>	<p>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.</p> <p><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.</p> <p>Violation: Minor - 1 point</p>
<p>10 <b>18VAC150-20-190(C)</b>  <b>§ 54.1-3410</b></p>	<p>All drugs dispensed for companion animals shall be labeled with the following:</p> <ol style="list-style-type: none"> <li>1. Name and address of the facility;</li> <li>2. First and last name of owner;</li> <li>3. Animal identification and species;</li> <li>4. Date dispensed;</li> <li>5. Directions for use;</li> <li>6. Name, strength (if more than one dosage form exists) and quantity of the drug; and</li> <li>7. Name of the prescribing veterinarian.</li> </ol> <p><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.</p> <p><u>Violation:</u> Major - 5 points for no label; or 2 points for an incomplete label. Inclusion of first name of owner is new; non-compliance will be noted, but no violation will be cited for failure to include first name of the owner until January 1, 2019.</p>

11 **18VAC150-20-190(D)(6)**

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.

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

- 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.

Guidance: Only personnel designated in the subsection shall have access to Schedule II, III, IV and V drugs. Drug stocks in establishments where keys and lock combinations are accessible to staff or the public (i.e. keys left in the lock, on a counter, hung on a hook; or combinations widely distributed or posted) are not considered secure. If the key or the combination is not secure, the drugs are not secure.

The veterinary establishment may want to ask self-assessment questions such as the following:

- 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?
- 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.

Violation: Major - 5 points

12 **18VAC150-20-190(D)(1)**

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.

Guidance: Requirement for a locked cabinet or safe that not easily movable is new; non-compliance will be noted, but no violation will be cited for failure to have a locked cabinet or safe that is not easily movable until January 1, 2019.

Violation: Major - 5 points

13	<p><b>18VAC150-20-190(D)(2)</b></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. Requirements related to working stock is new; non-compliance will be noted, but no violation will be cited for failure to maintain working stock per the regulatory requirements until January 1, 2019.</p> <p><u>Violation:</u> Major - 5 points</p>	
14	<p><b>18VAC150-20-190(D)(3)</b></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>Guidance:</u> Requirements related to working stock and dispensed prescriptions is new; non-compliance will be noted, but no violation will be cited for failure to maintain working stock per the regulatory requirements until January 1, 2019.</p> <p><u>Violation:</u> Major - 5 points</p>	
15	<p><b>18VAC150-20-190(D)(4)</b></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>Guidance:</u> Requirements related to dispensed prescriptions is new; non-compliance will be noted, but no violation will be cited for failure to maintain dispensed prescriptions per the regulatory requirements until January 1, 2019.</p> <p><u>Violation:</u> Major - 5 points</p>	

<p>16 <b>18VAC150-20-190(D)(5)</b> <b>§ 54.1-3404(E)</b></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"> <li>1. Virginia Board of Veterinary Medicine;</li> <li>2. Virginia Board of Pharmacy; and</li> <li>3. U.S. Drug Enforcement Administration.</li> </ol> <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>	
<p>17 <b>18VAC150-20-190(E)</b></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 <a href="http://www.deadiversion.usdoj.gov/drug_disposal/index.html">http://www.deadiversion.usdoj.gov/drug_disposal/index.html</a></p> <p><b>Disposal of Controlled Substances</b></p> <p>A practitioner may dispose of out-of-date, damaged, or otherwise unusable or unwanted controlled substances, including samples, by transferring them to a registrant who is authorized to receive such materials. These registrants are referred to as "Reverse Distributors." The practitioner should contact the local DEA field office for a list of authorized Reverse Distributors. Schedule I and II controlled substances should be transferred via the DEA Form 222, while Schedule III-V compounds may be transferred via invoice. The practitioner should maintain copies of the records documenting the transfer and disposal of controlled substances for a period of two years. It is recommended that Schedule VI drugs be destroyed in the same manner as Schedule III-V drugs. Expired drugs may be considered adulterated drugs, may not be transferred or donated, and must be destroyed as required by federal/state laws and regulations.</p> <p><u>Violation:</u> Major - 2 points</p>	



18 ~~18VAC150-20-190(F)~~

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.

Guidance: Requirement for refrigerated Schedule II through V to be kept in a locked container secured to the refrigerator or in a locked refrigerator is new; non-compliance will be noted, but no violation will be cited for failure to have secured storage for refrigerated Schedules II through V drugs until January 1, 2019.  
Violation: Major - 5 points

19 ~~18VAC150-20-190(G)~~

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.

Guidance: 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.

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.

Violation: 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.

20 ~~18VAC150-20-190(H)~~

~~§ 54.1-3404~~

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

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.

Guidance: The veterinarian's initials are acceptable to meet the requirement of "identification of the veterinarian."

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

Violation: Major - 5 points for no record; or 3 points for incomplete record or records not maintained in chronological order.

21 **18VAC150-20-190(F)**

**§ 54.1-3404**

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.

Guidance: 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. Requirement to maintain records for three years is new; non-compliance will be noted, but no violation will be cited for failure to maintain records for three years until January 1, 2019. A violation will be cited if records are not maintained for two years as previously required.

Violation: Major - 5 points for no record; or 3 points for an incomplete record or a record not maintained for three years.

22 **18VAC150-20-190(J)**

**§ 54.1-3404**

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.

The biennial inventory:

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.

Guidance: 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.

Violation: 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.

23 ~~18VAC150-20-190(K)~~

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.

Guidance: Requirements related to monthly reconciliation of Schedule II drugs is new; non-compliance will be noted, but no violation will be cited for failure to meet monthly reconciliation requirements until January 1, 2019. A violation will be cited if original invoices are not maintained separately from other records as previously required.

Violation: 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.

24 ~~§ 54.1-2522~~

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.

Violation: 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.

25 ~~18VAC150-20-190(D)~~

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.

Violation: Major - 5 points for no record; or 3 points for incomplete record(s).

**Bulk Reconstitution of Injectable, Bulk Compounding or Prepackaging**

**Result**

**Notes**

26 18VAC150-20-190(L)

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.

Reconstitution, compounding and repackaging records shall show the following:

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.

Guidance: 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 repackaged. Dispensing, labeling and recordkeeping requirements must be followed when repackaging drugs.

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 repackaged 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.

Violation: Major - 2 points

**Patient/Medical Recordkeeping**

**Result**

**Notes**

27 18VAC150-20-260(A)(6)(i)

All veterinary establishments must have storage for records.

Violation: Major - 2 points

<p><b>28 18VAC150-20-195(A)</b></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"> <li>1. Name of the patient and the owner;</li> <li>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.);</li> <li>3. Presenting complaint or reason for contact;</li> <li>4. Date of contact;</li> <li>5. Physical examination findings;</li> <li>6. Tests and diagnostics performed and results;</li> <li>7. Procedures performed, treatment given, and results;</li> <li>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;</li> <li>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</li> <li>10. Any specific instructions for discharge or referrals to other practitioners.</li> </ol> <p>Guidance: 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. Requirement for documenting discharge and referrals is new; non-compliance will be noted, but no violation will be cited for failure to document discharge and referral information until January 1, 2019. A violation will be cited for other recordkeeping requirements as previously required.</p> <p>Violation: 5 points for no records; or 3 points for only missing required information.</p>		
<p><b>29 18VAC150-20-195(B)</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>Violation: 3 points if individual records not maintained on each patient; and/or 1 point if records not maintained for required time period.</p>		
<p><b>30 18VAC150-20-195(C)</b></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>Violation: Major - 2 points</p>		

All Veterinary Establishments		Result	Notes
31	<p><b>18VAC150-20-130(C)</b></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>Violation: Minor - 1 point</p>		
<b>All Stationary Veterinary Establishments</b>			
32	<p><b>18VAC150-20-200(D)</b></p> <p>A separate establishment registration is required for separate practices that share the same location.</p> <p>Violation: Major - 5 points</p>		
<b>Establishments Performing Surgery</b>			
33	<p><b>18VAC150-20-200(A)(2)(c)</b></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>Violation: Minor - 1 point</p>		
34	<p><b>18VAC150-20-200(A)(2)(c)(1)</b></p> <p>The surgery room shall have walls constructed of nonporous material and extending from the floor to ceiling.</p> <p>Violation: Minor - 1 point</p>		
35	<p><b>18VAC150-20-200(A)(2)(c)(2)</b></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>Violation: Minor - 1 point</p>		
36	<p><b>18VAC150-20-200(A)(2)(c)(3)</b></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>Guidance: 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>Violation: Minor - 1 point</p>		
37	<p><b>18VAC150-20-200(A)(2)(c)(4)</b></p> <p>The surgery room shall have a surgical table made of non-porous material.</p> <p>Violation: Minor - 1 point</p>		
38	<p><b>18VAC150-20-200(A)(2)(c)(5)</b></p> <p>The surgery room shall have surgical supplies, instruments, and equipment commensurate with the kind of services provided.</p> <p>Violation: Minor - 1 point</p>		

<p><b>39 18VAC150-20-200(A)(2)(c)(6)</b></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>			
<p><b>40 18VAC150-20-200(A)(2)(c)(7)</b></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>			
<p><b>41 18VAC150-20-180(A)(3)</b></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>			
<b>Laboratory</b>			
<p><b>42 18VAC150-20-200(A)(3)</b></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>			
<b>Housing</b>			
<p><b>43 18VAC150-20-200(A)(4)(a)</b></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>			
<p><b>44 18VAC150-20-200(A)(4)(b)</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>			

45	<p><b>18VAC150-20-200(A)(4)(c)</b>  For housing animals, the establishment shall provide accommodations allowing for the effective separation of contagious and noncontagious patients.  Violation: Minor - 1 point</p>		
46	<p><b>18VAC150-20-200(A)(4)(d)</b>  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.  Violation: Minor - 1 point</p>		
<b>Radiology</b>			
47	<p><b>18VAC150-20-200(A)(5)</b>  A veterinary establishment shall either have radiology service in-house or documentation of outside service for obtaining diagnostic-quality radiographs.  Guidance: 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.  Violation: Minor - 1 point</p>		
48	<p><b>18VAC150-20-200(A)(5)(a)</b>  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.  Guidance: Dental units are considered to be radiographic equipment.  Violation: Major - 5 points</p>		
49	<p><b>18VAC150-20-200(A)(5)(b)</b>  If radiology is in-house, maintain and utilize lead aprons and gloves and individual radiation exposure badges for each employee exposed to radiographs.  Guidance: A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided.  Violation: Major - 5 points</p>		
<b>Minimum Equipment</b>			
50	<p><b>18VAC150-20-200(A)(6)(a)</b>  Minimum equipment in the establishment shall include an appropriate method of sterilizing instruments.  Guidance: Veterinary establishments must have an appropriate method of sterilizing instruments. Ambulatory mobile veterinary establishments must meet this requirement if appropriate for the services provided.  Violation: Minor - 1 point</p>		



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

**Stationary Veterinary Establishments - Open 24 hours/day**

**Notes**

**Result**

1 **18VAC150-20-200(B)(1)**

A stationary establishment that is open to the public 24 hours a day shall have licensed personnel on premises at all times and shall be equipped to handle emergency critical care and hospitalization. The establishment shall have radiology/imaging and laboratory services available on site.

Violation: Major - 5 points

**Buildings and Grounds**

**Notes**

**Result**

2 **18VAC150-20-200(A)(1)**

Buildings and ground must be maintained to provide sanitary facilities for the care and medical well-being of patients.

Violation: Major - 2 points

3 **18VAC150-20-200(A)(1)(a)**

Temperature, ventilation, and lighting must be consistent with the medical well-being of patients.

Guidance: A mobile service establishment shall meet this requirement if appropriate to the services provided.

Violation: Minor - 1 point

4 **18VAC150-20-200(A)(1)(b)(1)**

There shall be on premises hot and cold running water of drinking quality, as defined by the Virginia Department of Health.

Guidance: A mobile service establishment shall meet this requirement if appropriate to the services provided.

Violation: Minor - 1 point

5 **18VAC150-20-200(A)(1)(b)(2)**

There shall be on premises an acceptable method of disposal of deceased animals, in accordance with any local ordinance or state and federal regulations.

Guidance: A mobile service establishment shall meet this requirement if appropriate to the services provided.

Violation: Minor - 1 point

<p><b>6 18VAC150-20-200(A)(1)(b)(3)</b> There shall be on premises refrigeration exclusively for carcasses of companion animals that require storage for 24 hours or more. <b>Guidance:</b> A mobile service establishment shall meet this requirement if appropriate to the services provided. <b>Violation:</b> Minor - 1 point</p>		
<p><b>7 18VAC150-20-200(A)(1)(c)</b> Sanitary toilet and lavatory shall be available for personnel and owners. <b>Guidance:</b> A mobile service establishment shall meet this requirement if appropriate to the services provided. <b>Violation:</b> Minor - 1 point</p>		
<p><b>8 18VAC150-20-200(A)(2)(a)</b> The areas within the facility shall include a reception area separate from other designated rooms. <b>Guidance:</b> A mobile service establishment shall meet this requirement if appropriate to the services provided. <b>Violation:</b> Minor - 1 point</p>		
<p><b>9 18VAC150-20-200(A)(2)(b)</b> The areas within the facility shall include an examination room or rooms containing a table or tables with nonporous surfaces. <b>Guidance:</b> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided. <b>Violation:</b> Minor - 1 point</p>		
<b>Minimum Equipment</b>		
<p><b>10 18VAC150-20-200(A)(6)(d)</b> Minimum equipment in the establishment shall include equipment for delivery of assisted ventilation appropriate to the species being treated, including endotracheal tubes. <b>Guidance:</b> 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. <b>Violation:</b> Minor - 1 point</p>		

**Stationary Veterinary Establishments - Open < 24 hours/day**

**Notes**

**Result**

<p>1 <b>18VAC150-20-200(B)(2)</b>  <b>§ 54.1-3806.1</b>          A stationary establishment that is not open to the public 24 hours a day shall have licensed personnel available during its advertised hours of operation and shall disclose to the public that the establishment does not have continuous staff, in compliance with § 54.1-3806.1 of the Code of Virginia.  <u>Guidance:</u> The Disclosure form cannot be printed on the front or back of another document. It can be smaller than a standard piece of paper.  <u>Violation:</u> 3 points for missing form; and/or 1 point if form not compliant.</p>	
<p><b>Buildings and Grounds</b></p>	
<p>2 <b>18VAC150-20-200(A)(1)</b>          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</p>	
<p>3 <b>18VAC150-20-200(A)(1)(a)</b>          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</p>	
<p>4 <b>18VAC150-20-200(A)(1)(b)(1)</b>          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</p>	
<p>5 <b>18VAC150-20-200(A)(1)(b)(2)</b>          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</p>	

**Notes**

**Result**

6	<p><b>18VAC150-20-200(A)(1)(D)(3)</b> There shall be on premises refrigeration exclusively for carcasses of companion animals that require storage for 24 hours or more. <u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided. <u>Violation:</u> Minor - 1 point</p>		
7	<p><b>18VAC150-20-200(A)(1)(C)</b> Sanitary toilet and lavatory shall be available for personnel and owners. <u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided. <u>Violation:</u> Minor - 1 point</p>		
8	<p><b>18VAC150-20-200(A)(2)(a)</b> The areas within the facility shall include a reception area separate from other designated rooms. <u>Guidance:</u> A mobile service establishment shall meet this requirement if appropriate to the services provided. <u>Violation:</u> Minor - 1 point</p>		
9	<p><b>18VAC150-20-200(A)(2)(b)</b> The areas within the facility shall include an examination room or rooms containing a table or tables with nonporous surfaces. <u>Guidance:</u> A mobile service establishment shall meet all requirements of a stationary establishment appropriate for the services provided. <u>Violation:</u> Minor - 1 point</p>		
<b>Minimum Equipment</b>		<b>Result</b>	<b>Notes</b>
10	<p><b>18VAC150-20-200(A)(6)(d)</b> Minimum equipment in the establishment shall include equipment for delivery of assisted ventilation appropriate to the species being treated, including endotracheal tubes. <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. <u>Violation:</u> Minor - 1 point</p>		

**Stationary Veterinary Establishments - Limited**

**Notes**

**Result**

1 **18VAC150-20-200(C)**

When the scope of practice is less than full service, a specifically limited [stationary] establishment registration shall be required. Such establishments shall have posted in a conspicuous manner the specific limitations on the scope of practice on a form provided by the board.

**Guidance:** 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.

**Violation:** Minor - 1 point

**Stationary Veterinary Establishments - Open Less than 24 hours/day**

**Notes**

**Result**

2 **18VAC150-20-200(B)(2)  
§ 54.1-3806.1**

A stationary establishment that is not open to the public 24 hours a day shall have licensed personnel available during its advertised hours of operation and shall disclose to the public that the establishment does not have continuous staff, in compliance with § 54.1-3806.1 of the Code of Virginia.

**Guidance:** The Disclosure form cannot be printed on the front or back of another document. It can be smaller than a standard piece of paper.

**Violation:** 3 points for missing form; and/or 1 point if form not compliant.

**Buildings and Grounds**

**Notes**

**Result**

3 **18VAC150-20-200(A)(1)**

Buildings and ground must be maintained to provide sanitary facilities for the care and medical well-being of patients.

**Violation:** Major - 2 points

4 **18VAC150-20-200(A)(1)(a)**

Temperature, ventilation, and lighting must be consistent with the medical well-being of patients.

**Guidance:** A mobile service establishment shall meet this requirement if appropriate to the services provided.

**Violation:** Minor - 1 point

5	<p><b>18VAC150-20-200(A)(1)(b)(1)</b>  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>		
6	<p><b>18VAC150-20-200(A)(1)(b)(2)</b>  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>		
7	<p><b>18VAC150-20-200(A)(1)(b)(3)</b>  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>		
8	<p><b>18VAC150-20-200(A)(1)(c)</b>  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>		
9	<p><b>18VAC150-20-200(A)(2)(a)</b>  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>		
10	<p><b>18VAC150-20-200(A)(2)(b)</b>  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>		

Minimum Equipment		Result	Notes
11	<p><b>18VAC150-20-200(A)(6)(d)</b></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>Guidance: 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>Violation: Minor - 1 point</p>		



**Ambulatory Veterinary Establishments - Agricultural and Equine Establishments**

**Notes**

**Result**

1	<p><b>18VAC150-20-201(A)</b></p> <p>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.</p> <p>Violation: Major - 5 points</p>		
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**Ambulatory Veterinary Establishments - House Call or Proceduralist Establishment**

**Notes**

**Result**

2	<p><b>18VAC150-20-300(B)</b></p> <p>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.</p> <p>Violation: Major - 5 points</p>		
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3	<p><b>18VAC150-20-300(B)(1)</b></p> <p>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.</p> <p>Guidance: 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.</p> <p>Violation: Major - 5 points</p>		
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**Ambulatory Veterinary Establishments - Mobile Service**

**18VAC150-20-201(C)**

A mobile service establishment is a veterinary clinic or hospital that can be moved from one location to another and from which veterinary services are provided. A mobile service establishment shall meet all the requirements of a stationary establishment appropriate for the services provided.

Violation: Major - 5 points

**Buildings and Grounds**

**Notes**

**Result**

1 **18VAC150-20-200(A)(1)**

Buildings and ground must be maintained to provide sanitary facilities for the care and medical well-being of patients.

Violation: Major - 2 points

2 **18VAC150-20-200(A)(1)(a)**

Temperature, ventilation, and lighting must be consistent with the medical well-being of patients.

Guidance: A mobile service establishment shall meet this requirement if appropriate to the services provided.

Violation: Minor - 1 point

3 **18VAC150-20-200(A)(1)(b)(1)**

There shall be on premises hot and cold running water of drinking quality, as defined by the Virginia Department of Health.

Guidance: A mobile service establishment shall meet this requirement if appropriate to the services provided.

Violation: Minor - 1 point

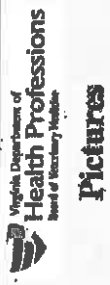
4 **18VAC150-20-200(A)(1)(b)(2)**

There shall be on premises an acceptable method of disposal of deceased animals, in accordance with any local ordinance or state and federal regulations.

Guidance: A mobile service establishment shall meet this requirement if appropriate to the services provided.

Violation: Minor - 1 point

5	<p><b>18VAC150-20-200(A)(1)(D)(3)</b> 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>		
6	<p><b>18VAC150-20-200(A)(1)(C)</b> 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>		
7	<p><b>18VAC150-20-200(A)(2)(a)</b> 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>		
8	<p><b>18VAC150-20-200(A)(2)(b)</b> 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>		
<b>Minimum Equipment</b>		<b>Result</b>	<b>Notes</b>
9	<p><b>18VAC150-20-200(A)(6)(d)</b> 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>		



Veterinary Establishment:

Date: