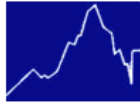


**From:** Virginia Board of Veterinary Medicine  
**Sent:** June 19, 2017  
**Subject:** News You Need: Veterinary Establishment Inspection Highlight



Virginia Department of  
Health Professions



[Board of Veterinary  
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**Board of Veterinary Medicine**

## **Veterinary Establishment Inspection Requirements**

### **Highlight of the Month**

The Board of Veterinary Medicine conducted a frequency analysis of deficiencies cited during veterinary establishment inspections. To keep licensees informed about compliance requirements, the most commonly cited deficiencies will be identified in a monthly email during 2017. This month's highlighted requirement is the following:

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

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

*D. All drugs shall be maintained in a secured manner with precaution taken to prevent diversion.*

- 1. All Schedule II through V drugs shall be maintained under lock at all times, with access to the veterinarian or veterinary technician only, but not to any unlicensed personnel.*

Guidance Document [76-21.2:1 Veterinary Establishment Inspection Report](#) states the following regarding drug security found in 18VAC150-20-190(1):

*Unlicensed personnel may not have access to Schedule II, III, IV and V drugs. Drug stocks in facilities where keys and lock combinations are accessible to unlicensed 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.*

*Evaluate office procedures regularly and make adjustments to avoid future problems. Ask some important questions such as the following:*

- *Do procedures cover securing drugs from the moment of arrival at the facility until administration to the patient or distribution to the client?*
- *Are drugs that must be maintained under lock ever stored at the reception desk in an unsecured manner and distributed by unlicensed personnel?*
- *Are drugs that must be maintained under lock ever stored in an unlocked refrigerator?*
- *Are blank prescription pads lying around the office where anyone could tear one off?*
- *Is there a check and balance system in place to detect possible theft or loss of drugs?*

*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 licensed personnel.*

*Schedule II, III, IV or V drugs that require refrigeration must be kept in a locked refrigerator or in a locked container placed inside the refrigerator.*

*The possession, administration, dispensing and disposing of Schedule II, III, IV and V drugs must be done in compliance with federal and state laws. All required documentation must be maintained at the location authorized to possess the drugs.*

Questions may be directed to the [vetbd@dhp.virginia.gov](mailto:vetbd@dhp.virginia.gov)