

Common VMB Inspection Issues and Tips for Avoiding Them

The California Veterinary Medical Board (VMB) has authority under California Business and Professions Code section 4809.5 to inspect registered veterinary premises at any time. The VMB inspection program's goal is to inspect 20% of registered premises annually, which equals approximately 750 practices per year. In addition, the VMB sets a goal to visit new veterinary premises within the first year of their initial registration. The following are common issues reported by VMB inspectors and tips on how to avoid them.

Expired pharmaceuticals and controlled substance disposal

Both regular and controlled expired or unwanted pharmaceuticals need to be properly separated, marked, and stored for disposal. They should be disposed of as soon as possible or on a regular contracted basis. Practices must show documentation indicating proper methods of disposal. Regular pharmaceuticals may be disposed of via a registered medical waste hauler or mail-back service, and proof of contract, receipt, or waybill may be used to demonstrate compliance. For controlled substances, a contract or DEA Form 222 from a Federal Drug Enforcement Administration (DEA)-approved reverse distributor or reverse distribution mail-back service is adequate.

Veterinary Assistant Controlled Substance Permits (VACSP)

All unlicensed staff who obtain or administer controlled substances must have a VACSP issued by the VMB. Staff



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who do not have access to the controlled substance cabinet and who do not prepare controlled substance medications may not need the permit, depending on how controlled substances are handled in the veterinary practice. Veterinarians and RVTs are licensed and therefore are exempt from the permit requirement. Visit the BreZE online system at vmb.ca.gov to apply for a permit.

Controlled substance storage and related drug logs

Only licensed or VACSP staff may have access to the controlled substance storage unit. The storage unit should be locked when not in use. Both the Dispensation and Biennial Inventory logs must contain all information required by the DEA. Sample DEA log forms can be found in the "Licensee" section at vmb.ca.gov.

Separate surgery room requirements

Only items related to sterile surgical procedures should be stored in the surgery room. Surgery preparation materials should not be stored in the surgery room. Shelving must be enclosed (with doors), sink drains must be permanently sealed, and any windows must be closed. Window coverings are allowed if they are clean and able to be disinfected. Doors to the surgery room

should remain closed at all times. Except for cases in which the size of the animal patient prevents entry into the surgery room from the interior of the premises, no doors should lead outside the hospital.

Contagious facilities

If a practice does not have a dedicated isolation area, a plan and protocol to prevent the spread of infectious disease is needed, regardless of whether the practice treats suspected contagious animals. A written statement that the practice does not treat contagious animals is not adequate.

Records

Records must contain all information set forth in California Code of Regulations, Title 16, Section 2032.3. Records must be legible. Illegible records can lead to serious consequences during VMB investigations or enforcement actions.

Title 17 posting

All practices with radiation-producing machines must post Title 17 of the California Code of Regulations in the vicinity of the machine or a notice near the machine indicating where Title 17 can be accessed for review. RHB 2364, Notice to Employees, does not meet the requirement. To obtain a copy of Title 17, visit the "Licensee" section of vmb.ca.gov.

Controlled Substance Utilization Review and Evaluation System (CURES) registration for all veterinarians

All veterinarians licensed to practice in California who have a DEA registration number must register for access to CURES, regardless of whether they dispense controlled substances to patients. To register for access to CURES, go to cures.doj.ca.gov.

Notice of ‘No Staff on Premises’

A notice is required in the reception area for practices housing animals overnight with no staff on the premises. A notice that meets the requirement may be purchased at cvma.net in the “Products” section found under the Resources tab.

Anesthetic equipment maintenance

Regulations require that anesthetic equipment used in the practice be functional and available at all times.

To comply with this requirement, the VMB needs proof that the equipment is being maintained in accordance with manufacturer recommendations. Hoses should be regularly inspected, cleaned, and changed if needed. CO2 absorbent and waste anesthetic gas canisters should be changed as needed. Proof of vaporizer calibration will be requested by the VMB inspector. Many practices will opt to use a professional service to inspect, calibrate, and service anesthesia machines. Service providers will leave documentation that can be shown to the VMB as proof of compliance.

Licenses/permits not displayed

The most common issue with this requirement is that the license posted is not current. All posted veterinarian and RVT licenses, premises permits, and VACSPs must be current, unaltered originals. The personal addresses of licensees may be covered but must be

viewable during an inspection. Some practices utilize a removable adhesive strip to cover the addresses. Relief veterinarians may carry their wallet license for compliance purposes.

To assist veterinary practices in complying with minimum standards, the VMB recently published an updated Hospital Self-Evaluation Checklist that can be downloaded and printed from the “Licensee” section at vmb.ca.gov. ■

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