

# Veterinary Medical Board

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## MEMORANDUM

<b>DATE</b>	November 13, 2018
<b>TO</b>	Multidisciplinary Advisory Committee (MDC)
<b>FROM</b>	Amanda Drummond, Administrative Programs Coordinator
<b>SUBJECT</b>	<b>Agenda Item 6. The Discussion and Consideration of Intra-Oral Dental Radiographic Equipment Requirements. Section <a href="#">2030</a>, Article 4, Division 20, Title 16 of the CCR.</b>

### **Background:**

At the [August 2018](#) meeting, the MDC discussed whether intra-oral dental radiographs are considered the standard of care in veterinary medicine and if the Veterinary Medical Board (Board) should consider mandating if they should be the standard of care. It was determined that the standard of care develops over time and that requiring intra-oral dental radiographs to be a standard of care in veterinary medicine would limit public access to dental services. Additionally, the MDC approximated that only 70% of veterinary practices have dental radiographic equipment and it would be difficult to mandate this requirement if the practices did not have the equipment.

Ultimately, [the MDC determined](#) there was no further action needed. The following day, at the Board meeting, [the Board discussed](#) that veterinary premises should have intra-oral dental radiographic equipment, or the ability to refer clients to another facility, if they wanted to provide these services. The Board requested that the MDC review [CCR 2030](#) regarding Minimum Standards and determine if intra-oral dental radiographic equipment be a requirement similar to the requirements [2030\(f\)\(4\)](#) regarding the ability to render diagnostic radiological services.

### **Attachments:**

- [CCR Section 2030](#) Regarding Minimum Standards for Fixed Veterinary Premises
- American Veterinary Medical Association (AVMA) Policy regarding Veterinary Dentistry
- Dental Radiograph Poll
- Nevada State Board of Veterinary Medical Examiners regulations regarding dental surgery

§ 2030. Minimum Standards - Fixed Veterinary Premises.

**16 CA ADC § 2030 BARCLAYS OFFICIAL CALIFORNIA CODE OF REGULATIONS**

Barclays Official California Code of Regulations [Currentness](#)

Title 16. Professional and Vocational Regulations

Division 20. Veterinary Medical Board

Article 4. Practice (Refs & Annos)

16 CCR § 2030

**§ 2030. Minimum Standards - Fixed Veterinary Premises.**

All fixed premises where veterinary medicine and its various branches are being practiced, and all instruments, apparatus and apparel used in connection with those practices, shall be kept clean and sanitary at all times and shall conform to or possess the following minimum standards:

(a) Indoor lighting for halls, wards, reception areas, examining and surgical rooms shall be adequate for their intended purpose.

(b) A reception room and office, or a combination of the two.

(c) An examination room separate from other areas of the facility and of sufficient size to accommodate the doctor, assistant, patient and client.

(d) If animals are housed or retained for treatment, the following shall be provided:

(1) Compartments for animals which are maintained in a comfortable and sanitary manner.

(2) Effective separation of known or suspected contagious animals.

(3) If there are to be no personnel on the premises during any time an animal is left at the veterinary facility, prior notice of this fact shall be given to the client. For purposes of this paragraph, prior notice may be accomplished by posting a sign in a place and manner conspicuous to the clients of the premises, stating that there may be times when there is no personnel on the premises.

(e) When a veterinary premises is closed, a sign shall be posted and visible outside the primary entrance with a telephone number and location where emergency care is available. An answering machine or service shall be used to notify the public when the veterinary premises will be re-opened and where after hours emergency care is available. If no after hours emergency care is available, full disclosure shall be provided to the public prior to rendering services.

**(f)** The veterinary premises shall meet the following standards:

(1) Fire precautions shall meet the requirements of local and state fire prevention codes.

(2) The facility, its temperature, and ventilation shall be maintained so as to assure the comfort of all patients.

(3) The disposal of waste material shall comply with all applicable state, federal, and local laws and regulations.

**(4) The veterinary premises shall have the capacity to render diagnostic radiological services, either on the premises or through other commercial facilities. Radiological procedures shall be conducted in accordance with Health and Safety Code standards.**

(5) Clinical pathology and histopathology diagnostic laboratory services shall be available within the veterinary premises or through outside services.

## AVMA - Veterinary Dentistry (2012)

The performance of veterinary dentistry and oral medicine and surgery is part of the practice of veterinary medicine and is regarded as such under state veterinary practice acts. Veterinary dentistry includes the cleaning, adjustment, filing, extraction, or repair of animals' teeth and all other aspects of oral health care in animals. Veterinary dentistry is a function of veterinary practice because it requires diagnosis and treatment, and, to be fully effective, demands extensive knowledge of anatomy, anesthesiology, pharmacology, physiology, pathology, radiology, neurology, medicine, and surgery that is part of the graduate veterinarian's training. Veterinary health-care workers may be allowed to perform certain dental procedures under the direct supervision of a licensed veterinarian in accordance with state regulations.

### Supporting Statements

- Veterinary dentistry is an invasive practice that can have a profound impact on animal health.
- Graduate veterinarians receive training in dentistry as part of the curriculum of colleges of veterinary medicine.
- Veterinarians are uniquely qualified to diagnose, by physical examination and use of diagnostics, to address unexpected conditions or complications discovered during oral and dental examinations and procedures and to prescribe follow-up care.
- The current AAHA-AVMA Canine Preventive Healthcare Guidelines and AAHA-AVMA Feline Preventive Healthcare Guidelines both include dental care as part of the assessment during annual veterinary examinations. The veterinarian should perform an oral examination on all animals at least yearly and discuss preventative measures to keep a patient's mouth healthy.
- When procedures such as periodontal probing, intraoral radiography, dental scaling, and dental extraction are justified by the oral examination, they should be performed under
- In regards to equine dentistry, oral medicine and surgery, "procedures which are invasive of the tissues to the oral cavity including, but not limited to, removal of sharp enamel points, treatment of malocclusions of premolars, molars, and incisors, reshaping of teeth, the extraction of first premolars and deciduous premolars and incisors; extraction of damaged or diseased teeth; treatment of diseased teeth via restorations and endodontic procedures; periodontal and orthodontic treatments; and dental radiography are veterinary dental procedures and should be performed by a licensed veterinarian."<sup>1</sup>
- Other species have oral and dental needs that are also included in the practice of veterinary medicine.
- The practice of veterinary dentistry and oral medicine and surgery is dependent on correct diagnosis of dental disease as well as the recognition of other serious diseases that can mimic dental problems in animals. These include, but are not limited to, zoonotic (e.g., rabies) and reportable (e.g., vesicular stomatitis) diseases.
- Sedatives, tranquilizers, anesthetics, or analgesics are commonly used during veterinary dental procedures to provide restraint and reduce animal pain and suffering. Visual or

radiographic recognition of oral or dental pathology and accurate assessment of periodontal health by probing of pockets require sedation or anesthesia. An endotracheal tube is to be placed to protect the lungs from the water droplets generated during ultrasonic dental scaling or when a high-speed dental unit is used. Preoperative sedation, intra-operative local or regional analgesia and post-operative analgesics are used as indicated to reduce the dose of anesthetic agent required and ensure a smooth, pain-free recovery period. Federal law restricts such veterinary prescription drugs for use by, or on the order of, a licensed veterinarian to ensure their safe and effective use.

- The field of veterinary dentistry is advanced through the conduct of clinical and experimental oral and dental research; these studies permit use of an evidence-based approach to veterinary oral and dental clinical decision making.
- Veterinary state boards and state veterinary practice acts exist to establish veterinarian accountability and provide clients with an acceptable standard of care.

### **Concluding Statements**

The practice of veterinary dentistry and oral medicine and surgery is, therefore, to be performed by veterinarians in accordance with their state veterinary practice acts. Veterinary health-care workers may be allowed to perform certain non-invasive, non-surgical oral and dental procedures under the direct supervision of a licensed veterinarian in accordance with state regulations.

As with other areas of veterinary practice, veterinary dentistry requires a veterinarian-client-patient relationship to protect the health, safety, and welfare of animals.

<sup>1</sup> Excerpt from AAEP Position on Equine Dentistry (2012) [www.aaep.org](http://www.aaep.org), used with permission.

## Do you believe dental radiographs are necessary prior to extractions in dogs and cats?

The VIN Quick Poll team has run this survey three years in a row 2015-2017

short summary:

For each year, the most popular response was "Yes, and my practice has dental radiography ".  
The percentage choosing this response has increased over time.

**2017:~50%**

**2016:~46%**

**2015:~39%**

### July 3, 2017

#### Do you believe dental radiographs are necessary prior to extractions in dogs and cats?

Yes, and my practice has dental radiography

**50.22%**

Yes, and I refer out because we don't have the equipment

**2.16%**

I would like to radiograph each patient prior to extraction but client finances don't always permit

**16.01%**

I do extractions; however, my practice doesn't have dental radiography

**21.85%**

I don't see the need for radiographs in most cases

**3.01%**

I don't do small animal dentistry

**2.88%**

I am not in small animal clinical practice

**0.36%**

I am not in clinical practice

**0.85%**

Other

**2.74%**

*Total takers: 2224*

### May 9, 2016

#### Do you believe dental radiographs are necessary prior to extractions in dogs and cats?

Yes, and my practice has dental radiography

**46.21%**

Yes, and I refer out because we don't have the equipment

**2.58%**

I would like to radiograph each patient prior to extraction but client finances don't always permit

**17.85%**

I do extractions; however, my practice doesn't have dental radiography

**25.64%**

I don't see the need for radiographs in most cases

**2.5%**

I don't do small animal dentistry

**2.54%**

I am not in small animal clinical practice

**0.21%**

I am not in clinical practice

**0.86%**

Other

**1.86%**

*Total takers: 2796*

## February 9, 2015

### Do you believe dental radiographs are necessary prior to extractions in dogs and cats?

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Yes, and my practice has dental radiography

**38.65%**

Yes, and I refer out because we don't have the equipment

**1.85%**

I would like to radiograph each patient prior to extraction but client finances don't always permit

**19.26%**

I do extractions; however, my practice doesn't have dental radiography

**31.29%**

I don't see the need for radiographs in most cases

**3.79%**

I don't do small animal dentistry

**2.6%**

I am not in small animal clinical practice

**0.22%**

I am not in clinical practice

**0.79%**

Other

**1.81%**

*Total takers: 2269*



**ADOPTED REGULATION OF THE NEVADA STATE BOARD OF  
VETERINARY MEDICAL EXAMINERS**

**LCB File No. R063-13**

§§1-23 and 25 become effective June 23, 2014  
§24 becomes effective January 1, 2016

EXPLANATION – Matter in *italics* is new; matter in brackets ~~(inserted/omitted)~~ is material to be omitted.

AUTHORITY: §§1-10, 12-16 and 21-25, NRS 638.070; §11, NRS 638.070, 638.100, 638.116, 638.122 and 638.132; §17, NRS 638.070 and 638.124; §§18 and 19, NRS 638.070 and 638.132; §20, NRS 638.070 and 638.119.

A REGULATION relating to veterinary medicine; prescribing the duties of a supervising veterinarian in a veterinary facility where animals are boarded; setting forth the requirements pursuant to which veterinary dentistry may be performed; revising certain continuing education requirements for licensees; adopting by reference a code of ethics for veterinary technicians; defining the term “informed consent” for the purposes of a veterinarian-client-patient relationship; establishing a fee for the issuance of certain duplicate licenses, registrations and permits; revising the required contents of a medical record of an animal; revising the tasks that a licensed veterinary technician is authorized to perform; revising provisions relating to the labeling of sodium pentobarbital; and providing other matters properly relating thereto.

**Legislative Counsel’s Digest**

Existing law authorizes the Nevada State Board of Veterinary Medical Examiners to adopt regulations to carry out the practice of veterinary medicine, including, without limitation, regulations relating to the rights, responsibilities and licensing of veterinarians, veterinary technicians, euthanasia technicians and the licensing and maintenance of veterinary facilities. (NRS 638.070, 638.119, 638.124, 638.132)

**Section 3** of this regulation provides that, with limited exceptions, only a person who is a diplomate from an approved specialty board of the American Veterinary Medical Association and is licensed to practice veterinary medicine pursuant to a specific state statute may use the title “veterinary specialist.”

**Section 4** of this regulation authorizes a licensed veterinarian (a veterinarian who is licensed and on active status to practice in this State) to consult with another veterinarian, but provides that the licensed veterinarian who sought the consultation retains responsibility for any medical decisions he or she makes regarding the animal. **Section 4** also defines the term “consult” for the purposes of that section.

3. Each chiropractor who has been issued a certificate of registration shall:

(a) Maintain in this State for at least 4 years a separate written medical record of each animal receiving animal chiropractic.

(b) Within 48 hours after the initial visit with the animal, mail or transmit ~~by facsimile machine~~ *electronically* a complete copy of the medical record to the veterinarian under whose direction the chiropractor performs the animal chiropractic.

(c) Within 48 hours after each subsequent visit with the animal, mail or transmit ~~by facsimile machine~~ *electronically* a progress report to the veterinarian under whose direction the chiropractor performs the animal chiropractic.

4. *Any medical record made pursuant to subsection 3 must be available for inspection by the Board or its representative.*

5. The veterinarian shall include the copy of the medical record received pursuant to subsection 3 in the medical record required pursuant to NAC 638.0475. The written medical record must include, without limitation:

(a) The name, address and telephone number of the owner of the animal;

(b) The name or identifying number, or both, of the animal;

(c) The age, sex and breed of the animal;

(d) The dates of care, custody or treatment of the animal;

(e) The results of a basic physical examination related to musculoskeletal manipulation;

(f) The diagnosis and treatment plan related to musculoskeletal manipulation recommended by the chiropractor for the animal; and

(g) The progress and disposition of the case.

**Sec. 24.** Section 6 of this regulation is hereby amended to read as follows:



Sec. 6. 1. Except as otherwise provided in NAC 638.0525 or 638.053, veterinary dentistry may only be performed by a licensed veterinarian.

2. Veterinary dentistry must be performed under general anesthesia with the use of an endotracheal tube with an inflated cuff unless, based on the species of the animal, the Board determines otherwise.

3. *Except as otherwise provided in this subsection, a licensed veterinarian may perform dental surgery, periodontal surgery, endodontics and exodontia on an animal only in a veterinary facility that has the capacity to perform intraoral radiology. In an emergency, a licensed veterinarian may perform dental surgery, periodontal surgery, endodontics and exodontia on an animal in a veterinary facility that does not have the capacity to perform intraoral radiology if the licensed veterinarian determines, based on his or her professional judgment and the species of the animal, that the radiology which the veterinary facility has the capacity to perform is adequate for the particular procedure.*

4. Nothing in this section shall be construed to prohibit a person from using cotton swabs, gauze, dental floss, dentifrice, toothbrushes or similar items to clean an animal's teeth.

5. As used in this section, "veterinary dentistry" means:

(a) The application or use of any instrument or device to any portion of an animal's tooth, gums or any related tissue for the prevention, cure or relief of any wound, fracture, injury or disease of the animal's tooth, gums or related tissue; and

(b) Preventive dental procedures pertaining to an animal, including, without limitation, the removal of calculus, soft deposits, plaque or stains and the smoothing, filing, floating or polishing of the surfaces of the animal's tooth.

**Sec. 25.** 1. This section and sections 1 to 23, inclusive, of this regulation become effective on June 23, 2014.

2. Section 24 of this regulation becomes effective on January 1, 2016.