The Role of the Part-time Attending Veterinarian Under the Animal Welfare Act

Script narration for the presentation of the same name

Slide 1-
The Animal Welfare Act (AWA) was passed to assure that humane care is provided to animals used in research, teaching, experimentation, exhibition, or sold as pets. As an attending veterinarian working with the licensee or registrant of a facility regulated by the United States Department of Agriculture (USDA), you will have the opportunity to provide comprehensive guidance concerning the health and welfare of the animals. This presentation explains the role of the part-time attending veterinarian and relationship with the regulated facility.

Full-time attending veterinarians for USDA regulated facilities will find this presentation helpful in understanding the attending veterinarian role; relationship with licensee or registrant and USDA Animal Care inspectors; and general knowledge of the Animal Welfare Act.

Slide 2-
By the end of this presentation, you should be able to:

• Know the benefits of becoming an attending veterinarian (AV)
• Understand the Animal Welfare Act and Animal Welfare regulations
• Explain the regulatory requirements of licensee and registrants to provide veterinary care
• Explain the role of the part-time attending veterinarian
• Describe the elements of a Program of Veterinary Care

This presentation also provides links to documents and resources that explain in detail the role of part-time attending veterinarian.

Slide 3-
Regulated facilities that must establish relationships with attending veterinarians under the Animal Welfare Act are:

• Breeding Facilities – facilities that breed and sell dogs and other regulated animals
• Exhibits - zoos, circuses, educational demonstrations, and certain performances
• Research Facilities – facilities where regulated animals are used in research, education, and experimentation

Slide 4-
The role of part-time attending veterinarian encompasses opportunities and benefits that are in addition to regular veterinary practice. Attending veterinarians often find the role adds an extra, rewarding dimension to their veterinary experience. Attending Veterinarians

• Provide veterinary care to a large number of animals at a USDA regulated facility
• Are in a position to ensure proper veterinary care to be administered at the facility
• Oversee animal care for the benefit of the animals
• Can incorporate part-time position within regular practice
• Gain experience treating diverse issues in addition to those encountered in regular practice

Slide 5-
The Part-time attending veterinarian position provides business benefits as well, including:

• Providing additional steady revenue
• Bringing in new clients
In order to understand the role of attending veterinarian, we need to understand:

- The Animal Welfare Act and regulations
- The responsibilities of the regulated facility to provide adequate animal care and to assure that the attending veterinarian has the authority to ensure humane care of animals
- The support that Animal Care inspectors provide to the attending veterinarian

This section will provide an overview of the Animal Welfare Act and the corresponding Animal Welfare regulations.

The Animal Welfare Act (AWA) was enacted by Congress in 1966 in response to public outcry at the stealing, transport, and resale of pets for use in animal research.

The Animal Welfare Act sets general standards for humane care and treatment that must be provided for certain animals that are:

- Sold commercially for use as pets
- Exhibited to the public
- Used in research, teaching, testing and experimentation
- Transported commercially

The AWA is administered by Animal Care, which is part of the United States Department of Agriculture (USDA) Animal Plant and Health Inspection Service (APHIS), within the Executive Branch of the Federal government. Animal Care:

- Establishes acceptable standards of humane care and treatment for regulated animals
- Monitors and achieves compliance through inspections, enforcement, education, and cooperative efforts

Non-compliant items are documented on the facility inspection report, and refer to the licensee/registrant, and not the attending veterinarian.

The AWA applies to warm-blooded animals such as:

- Pet animals sold commercially
- Animals used in research, teaching, testing and experimentation
- Animals exhibited to the public

Certain animals are not covered by the AWA. These include:

- Farm animals raised for agricultural purposes – meat, milk, wool, etc.
- Horses not used in research
- Mice of genus *mus* and rats of genus *rattus* and birds that are bred for use in research
- Cold-blooded animals – for example snakes, alligators, lizards

This section covers the requirements that licensees and registrants must provide for animals in their regulated facility.

A licensee is any person licensed under the Animal Welfare Act as a breeder, dealer or exhibitor

A registrant is the facility where regulated animals are used in research, education, and experimentation (a registrant can also be someone who transports animals commercially)

Licensees and registrants are responsible for compliance with the Animal Welfare Act
Slide 14-
A licensee or registrant must provide prescribed levels of care for:
  - Facilities – housing, primary enclosures, ventilation, lighting, interior surfaces
  - Animals – compatibility, and provision of veterinary care (and exercise opportunities for dogs)
  - Husbandry – sanitation, pest control, feeding and watering, handling, transportation

Slide 15-
  - Regulations concerning Veterinary Care are found in the following sections:
    - Animals in Research Facilities: 9 CFR Chapter 1; 2.33
    - Animals in all other regulated facilities: 9 CFR Chapter 1; 2.40
  - Licensees and registrants are held responsible for non-compliance, not the attending veterinarian

Slide 16-
This section describes the qualifications needed to serve as an attending veterinarian.

Slide 17-
A veterinarian must have certain qualifications to serve as an attending veterinarian:
  - A graduate of an accredited veterinary school or equivalent
  - Training/experience in the care and management of animals maintained in the facility

Slide 18-
The attending veterinarian must have training/experience in the care and management of species being attended to.

In facilities where the AV does not have training and/or experience with all animals present, the AV must arrange to consult with other veterinarians with experience with these species. The AV may also take steps to learn about those species and how to provide appropriate veterinary care.

Slide 19-
The following section will introduce the role of the part-time attending veterinarian and the relationship with the regulated facility in caring for animals.

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The role of the attending veterinarian is an opportunity to support the welfare of animals and to contribute to the success of the regulated entity.

Attending veterinarians are NOT regulated under the AWA. The Animal Care inspector inspects the facilities to assess whether the licensee or registrant is compliant.

Non-compliance issues in the area of adequate veterinary care at a regulated facility usually stem from the failure of the licensee to contact or to follow instructions from the attending veterinarian.

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In traditional practice the veterinarian recommends treatment but a client can decline services. In this relationship, the AV is authorized by the licensee or registrant to oversee not only the veterinary care but also other aspects of animal care and use including cleaning & disinfection, rodent control, genetic standards and more. The regulated facility is expected to follow the advice of the AV and follow treatment instructions.

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An attending veterinarian offers animals under treatment the same quality of veterinary care independent of ownership or function of the animal.
  - Provide each individual animal veterinary care that ensures its health and well-being
  - Develop a program that covers all health-related aspects of care: health, disease monitoring and prevention, husbandry, employee knowledge, after-hours care
  - Provide prevention, monitoring and treatment programs to achieve “herd health”
The attending veterinarian must have a formal arrangement with the regulated facility either:
- As a full-time employee
- As a part-time consultant

The formal arrangements must include:
- For a part-time attending veterinarian, there must be a written Program of Veterinary Care to document the overall program of care. It is a best practice for the AV and regulated facility to record in writing all activities and treatment for review by the Animal Care inspector
- If the attending veterinarian is a full-time employee of the facility, the veterinary records will be sufficient, and a written Program of Veterinary Care is not required
- Licensee or registrant and attending veterinarian must agree on a schedule of regular visits

The Attending veterinarian must have appropriate authority
The licensee or registrant is responsible for communicating with the AV on animal health, behavior and well-being
The AV makes regularly scheduled visits to the facility

USDA APHIS Animal Care supports the attending veterinarian’s role in providing care to animals at a regulated facility.
Animal Care inspectors review the Program of Veterinary Care at the facility including AV’s recommendations in the written Program of Veterinary Care (PVC). It is the responsibility of the regulated facility to follow the recommendations. Any non-compliant items refer to the regulated facility, and not the attending veterinarian.

This section provides details of the Program of Veterinary Care (PVC).

The Program of Veterinary Care (PVC) is the comprehensive program of care carried out at the facility:
- The written Program of Veterinary Care is the documentation of the overall program
- The AV develops PVC to be carried out at facility
- The PVC must be kept available for Animal Care inspector to review

AV’s are encouraged to contact the USDA Animal Care inspector or Veterinary Medical Officer (ACI / VMO) with questions about the PVC. The regulated facility has contact information for the Animal Care inspector assigned to the facility.

The regulated facility is responsible for implementing the Program of Veterinary Care. Some of the main elements include:
- Daily observation of all animals to assess health and well-being (physical and behavioral)
- Mechanisms for direct and frequent communication with the attending veterinarian
- Appropriate methods of preventing, treating and controlling diseases and injuries
- Appropriate facilities, personnel, equipment and services to carry out programs
- Plans for observing animals on weekends, holidays and in emergencies
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The licensee or registrant, or delegated workers, must observe every animal every day. The regulated facility must report to AV if any animal shows signs of disease, injury, behavior or well-being issues as part of the Program of Veterinary Care. The Animal Care inspector documents non-compliance when problems are not properly observed and reported to the AV or when the regulated facility should know that further care is needed. Conditions to be monitored and addressed include eye, skin, dental, ears, toenails/feet, body condition, musculoskeletal, trauma, expired medication and vaccines.

Slide 30-
Licensees and registrants must have a means of direct and frequent communication with the attending veterinarian to establish the Program of Veterinary Care including addressing any problems that occur. The information must be communicated accurately and in a timely manner. Means of communication can include phone calls, log books or medical records.

The regulated facility must act on the recommendations made by the attending veterinarian. It is a best practice for the attending veterinarian to provide written records/instructions as needed to be sure the directions are clear and accurate. It is also a best practice for the regulated facility to record the communications and actions. The Animal Care inspector relies on records to determine adequate level of care, and determine whether the regulated facility is compliant. The inspector will discuss the PVC with the licensee or registrant, and occasionally will speak with the attending veterinarian.

Slide 31-
The Program of Veterinary Care must cover these categories with adequate detail and other categories as needed:

- Care of injuries
- Treatment of disease
- Vaccines and administration
- Biologics and prescription medicines
- Parasite and pest control
- Nutrition
- Reproduction

Slide 32-
The regulated facility must provide appropriate facilities with attending veterinarian oversight:

- Clean areas for administering medications, treatments and vaccinations
- Appropriate areas for quarantine of new animals and treatment for sick animals
- Appropriate labels and storage of medications and vaccines

Slide 33-
The regulated facility must ensure, based on guidance from the attending veterinarian, that people working with the animals have the training to carry out assigned aspects of caring for animals. The AV provides guidance in training employees in tasks related to veterinary care – the regulated facility must ensure that all training is carried out.

People who work with the animals must learn how to do the following properly:

- Handle animals
- Administer medications
- Administer vaccinations and parasite preventative medicines
- Take care of wounds
- Take care of animals recovering from surgery
- Euthanize animals in cases where that can be performed by someone other than the veterinarian
Slide 34-
The regulated facility must have plans for observing animals, during:
- Weekends
- Holidays
- Emergencies
  - Personal emergencies
  - Natural disasters

Slide 35-
For animals being transported, regulated facility must contact a veterinarian to:
- Determine that the animal is healthy and can be transported
- Issue Health Certificate
- Write specific instructions for giving food and water, and acclimation when different from the regulations

Slide 36-
Formal arrangements must include regularly scheduled visits by the attending veterinarian to the facility. It is recommended that site visits occur yearly as a minimum. AV’s visit with varying frequency. Some schedules occur as frequently as every two weeks, while other situations call for only an annual visit. Individual attending veterinarians determine the appropriate number of visits for the particular facility. Visits should occur as often as necessary to ensure that the AV is aware of the conditions of the animals and facilities, and to make appropriate recommendations regarding the health, safety, and welfare of the animals.

Slide 37-
Additional visits may be required for:
- Disease outbreaks
- Ill or injured animals
- Training of caretakers
- Proper introduction of new animals

Slide 38-
Next, we will talk about the proper documentation needed to create a Program of Veterinary Care.

Slide 39-
The Program of Veterinary Care is the comprehensive program of care recommended by the attending veterinarian and that the regulated facility agrees to carry out. A written Program of Veterinary Care is required if an attending veterinarian is employed on a part-time basis. The document needs to be detailed enough that the regulated facility and Animal Care inspector can understand what has been directed by the AV for the appropriate care of animals in the facility. The PVC represents the relationship between the facility and the AV and the agreement to provide for the health and welfare of the animals.

Slide 40-
- Any format is acceptable as long as it contains required information
- Attending veterinarian and regulated facility must agree on use of the form

Slide 41-
APHIS Form 7002 was developed to provide guidance in preparing a Program of Veterinary Care. Use of this form is not required, but it contains the information required by the regulations. A different format can be used, but it must contain all necessary information.
Slide 42-
- The written Program of Veterinary Care must be updated with:
  - Addition of a new species
  - Change of attending veterinarian
  - Change in any veterinary program or practices
  - Change in needs or status of any animals at the facility
  - Option for AV to put chronic conditions of animals (i.e., geriatric animals) in written PVC
- The regulated facility must have the current written PVC available for Animal Care inspection. It should be reviewed and updated often enough that it is accurate and reflects the facility’s current practices and inventory.

Slide 43-
Next, we will provide an overview of the differences in the role of the attending veterinarian at a regulated research facility.
These responsibilities are in addition to the AV’s role to provide veterinary care and oversight as covered in the previous slides.

Slide 44-
The part-time attending veterinarian in research facilities supports animal treatment to:
- Ensure the provision of adequate veterinary care and oversee other aspects of animal care and use
- Work in close coordination with the Institutional Care and Use Committee (IACUC)

Slide 45-
- Research facilities that use regulated animals in research must have an attending veterinarian:
  - Full-time or part-time with same formal arrangements
  - AV provides same oversight and care of animals
- AV has additional responsibilities at research facilities

Animal Welfare Act regulations regarding research facilities are located in the Animal Welfare Act Regulations and Standards.

Slide 46-
The attending veterinarian provides guidance to principal investigators and other personnel regarding:
- Handling, immobilization, anesthesia, analgesia, tranquilization, and euthanasia
- Adequate pre-procedural and post-procedural care in accordance with current established veterinary medical and nursing procedures

Slide 47-
The Institutional Care and Use Committee (IACUC)
- Assesses the research facility’s animal program, facilities, and procedures
- Consists of at least three members including a veterinarian – usually the attending veterinarian

The research facility is required to establish the IACUC for the purpose of evaluating the care, treatment, housing, and use of animals, and for certifying compliance with the AWA by the research facility.

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IACUC reviews, every six months or more often, facility’s program for humane care and use of animals:
- Inspects animal facilities
- Prepares reports
- Investigates complaints as they occur
Slide 49-
The resources from the AWA regarding the attending veterinarian’s role include The AWA and regulations and standards, USDA Animal Care Policy Manual Policy #3 Veterinary Care, Responsibilities of regulated facility are spelled out in the training presentation posted by the USDA.

Slide 50-
You should now have the information you need to:
• Know the benefits of becoming an attending veterinarian
• Understand the Animal Welfare Act and Animal Welfare regulations
• Explain the regulatory requirements of licensees and registrants to provide veterinary care
• Explain the role of the part-time attending veterinarian
• Describe the elements of a Program of Veterinary Care

Slide 51-
This presentation was prepared by the Center for Food Security and Public Health, Iowa State University, through a cooperative agreement with USDAAPHIS Animal Care.

Slide 52-
Are there any questions at this time?