

**GEORGIA STATE BOARD OF VETERINARY MEDICINE**  
**Rules Committee Zoom Meeting Minutes**  
**Thursday, March 30, 2023 - 12:00 p.m.**

The Georgia State Board of Veterinary Medicine, Rules Committee, met via Zoom meeting on Thursday, March 30, 2023. The following Committee members were present:

**Committee Members Present**

Dr. William Wright, DVM, Committee Chair  
Dr. Wendy Cuevas, DVM, Committee Vice Chair  
Ms. Jessica Sewell, LVT, Committee Member

**Staff Present**

Adrienne Price, Executive Director  
Michelle Hornaday, Board Support Specialist  
Meagan Doss, Complaints/Compliance Analyst

**Committee Members Absent**

No Committee Member absent.

**Attorney General's Office**

No Assistant Attorney General present.

**Visitors Present**

Keri Riddick, DVM, Executive Director, Georgia Veterinary Medical Association (GVMA)  
Jill Lancaster, DVM, Advocacy Chair, Georgia Veterinary Medical Association (GVMA)

**Call to Order:** Dr. Wright called the Committee meeting to order at 12:06 p.m.

**OPEN SESSION**

**Agenda** The Committee accepted the agenda as presented.

**Discussion – Board Rule 700-12-.10. Radiology**

- 1. Georgia Administrative Code RE: X-Rays in the Healing Arts**
- 2. VET Facility Inspection Form**

The Board voted to refer Board Rule 700-12-.10. Radiology and the VET Facility Inspection Form to the Rules Committee during the February 8, 2023 Zoom meeting to draft language that will provide clear guidance to licensees and Board Investigators on the documentation licensees must possess and provide when their radiological equipment is being inspected. The Committee discussed the need to clear up inconsistencies between the rules of the Georgia Department of Community Health (GDCH), the Board rule, and the Facility Inspection Form. Any changes will aid in prohibiting/preventing unsafe practices by clarifying radiological requirements for veterinary facilities. Stakeholder confusion and consumer safety were great motivators for amending the rule and the inspection form with language that is clear and concise.

Dr. Cuevas remarked that the Board's Rule should reference exactly where veterinarians can find the requirements for x-rays and radiology as it is unclear where they should go to review the information. She indicated that Rule 111-8-90-.04 Rules and Regulations for X-Ray, is found in the Georgia Administrative Code Rules of the Department of Community Health (GDCH). Ms. Price remarked that it may be best to include language in the Vet Board Rules which refers licensees to the GDCH for requirements rather than name the rule itself as rule numbers and titles do change periodically and the Board wouldn't want to have to amend the rule each time the GDCH makes a change.

Ms. Sewell noted that inspections should be required each time there is an equipment software upgrade or, for example, if a new table is installed. She noted that a physicist should be required to inspect such changes for consumer protection, and that American Animal Hospital Association (AAHA) requires radiographic machines to be calibrated/inspected annually. She continued that she feels similar guidelines should be in place so potential problems do not arise. She remarked that since the official inspection process could be expensive, it could tempt licensees to put this safety measure on the backburner. Ms. Sewell recommended that an assessment of a licensee's Personal Protective Equipment (PPE) be included in inspections to minimize workplace hazards, offering as an example that it is common for lead gowns to become cracked which would defeat their very purpose.

Ms. Price noted that the current facility inspection form offers no guidance for Investigators, and that updating guidelines would provide practitioners a checklist to improve compliance while at the same time provide guidance to the Investigators. Dr. Cuevas noted that the GDCH rule does not mention how often radiographic machines are inspected and this requirement should be maintained as much as other diagnostic machines in clinics. Although she clarified it is not the Board's responsibility to regulate the GDCH rules

as far as frequency, she felt it was important for licensees to be informed on what is expected. Dr. Cuevas indicated that licensees could submit a calibration of maintenance report to the GDCH at the time of inspection. Ms. Sewell agreed with Dr. Cuevas's comments and shared that other states require automatic inspection of veterinary facility radiographic facilities.

Ms. Price stated that if a complaint were to arise, she would think the most recent inspection would come into play and a peer review would be necessary to analyze the information. Additionally, the Board could refer a complaint to GDCH if the allegations were relevant to radiology. Dr. Wright remarked that there should be a clear and concise list of requirements and it is the licensee's responsibility to keep up with them.

Ms. Sewell queried if the Committee could propose updates to the inspection checklist/form with more detailed requirements and Ms. Price responded that this is exactly what the agency Investigators are requesting from the Board. Dr. Cuevas underscored that the Board should not be required to monitor compliance with the GDCH radiologic rules, but rather ask GDCH for recommendations on inspection details or monitoring to help guide the Board's rule promulgation process and amendments to the facility inspection form. She further commented that equipment leakage can go undetected with no system for checks and balances, which has the potential to cause significant harm to the public.

Based on the discussion, Ms. Price suggested that it may be helpful for the Board to submit a letter of request for the information to GDCH and include a request for a copy of their inspection form. The Committee agreed to table discussion of amendments to Board Rule 700-12-.10. Radiology and the VET Facility Inspection Form and to put forth the following recommendation to the full Board for review during the April 5, 2023 Board meeting: For the purpose of developing veterinary guidance documents and rules related to compliance with Department of Community Health Rule 111-8-90.01, the Rules Committee recommends that the Board vote to submit a letter to the Georgia Department of Community Health to request a recommendation and/or information regarding their standard inspection frequency for radiology equipment and a copy of the x-ray and radiology forms used when they conduct inspections.

**Adjournment** No further business was discussed, and the Committee meeting adjourned at 12:40 p.m.

**Minutes recorded by:** Michelle Hornaday, Board Support Specialist  
**Minutes reviewed by:** Megan Doss, Licensing Analyst & Adrienne Price, Executive Director  
**Minutes approved on:** April 5, 2023

WILLIAM WRIGHT, DVM  
**COMMITTEE CHAIRPERSON**

ADRIENNE PRICE  
**EXECUTIVE DIRECTOR**

MATTHEW BRADLEY, DVM  
**BOARD CHAIRPERSON**