GUIDANCE ON VETERINARY PRACTICES AMID COVID-19 PANDEMIC

On March 19, 2020, Governor Wolf and the Secretary of Health ordered the closure of all non-life sustaining businesses to mitigate the spread of COVID-19. The Governor’s Order is available here and the Secretary of Health’s Order is available here. To begin the process of reopening businesses, the Wolf Administration is utilizing a phased plan to determine when counties can ease restrictions. As counties move through the phased reopening, businesses with in-person operations must follow business and building safety orders as amended, whether the phase in which the business is located is red, yellow or green.

Veterinary medicine services are life-sustaining businesses and have been permitted to continue to operate throughout the COVID-19 pandemic. As veterinarians continue to provide services through the phased reopening, it is important to promote public health practices and align with efforts to mitigate the spread of COVID-19. There are measures veterinarians can take to protect the health of their staff and the public. The Pennsylvania Departments of Health, Agriculture, and State appreciate the cooperation of the veterinary community and have developed the following guidance for veterinary practices during the COVID-19 pandemic.

Guidance for Veterinary Practices

The Pennsylvania State Board of Veterinary Medicine (State Board) has temporarily adopted the American Veterinary Medical Association’s (AVMA’s) COVID-19 guidelines, including the following:

- Minimizing COVID-19 Exposure and Social Distancing in Veterinary Practice
- Guidelines for Use of Personal Protective Equipment (PPE)
- COVID-19: What Veterinarians Need to Know

The temporary adoption of the guidelines was communicated through a special notice issued by the State Board, which can be found here. Additionally, information regarding the use of telemedicine during the COVID-19 pandemic and the temporary suspension of some continuing education requirements can be found on the State Board’s website. With the Governor’s authorization as conferred in the Proclamation of Disaster Emergency issued on March 6, 2020, the Pennsylvania Department of State suspended requirements related to telemedicine and reactivation of retired practitioners. The State Board considers these guidelines as standards of care for practices during the COVID-19 pandemic.
Veterinarian practices should adhere to the State Board’s guidance and recommendations from the AVMA and follow the guidance related to phased reopening, explained below, when determining whether to conduct a procedure. The Patient Assessment flowchart from the Pennsylvania Veterinary Medical Association (PVMA) and the Triage Flowchart from the American Veterinary Medical Association (AVMA) are considered best practices. The State Board considers these guidelines as standards of care during the COVID-19 pandemic.

Failure to recognize and institute measures for appropriate social distancing, and the preservation of PPE during the emergency disaster declaration may constitute unprofessional conduct and be subject to disciplinary action by the State Board.

**Non-Essential, Routine or Elective Surgical Procedures, including Spay/Neuter**

Non-essential services and routine or elective surgical procedures (such as spaying and neutering) may now take place in counties that are in yellow and green.

Pennsylvania’s Dog Law requires shelters and rescues to have dogs and cats spayed/neutered prior to adoption. In consultation with the Pennsylvania Department of Health and the Pennsylvania Veterinary Medical Association (PVMA), effective April 2, 2020, the Pennsylvania Department of Agriculture has temporarily waived this requirement due to concerns over the spread of COVID-19. This action will allow conservation of PPE and limit risk of exposure to COVID-19 for veterinarians. Shelters must keep a running list of pets adopted during the COVID-19 pandemic, provide a copy to the Pennsylvania Department of Agriculture, and follow up with adopted pet owners to ensure the procedure takes place. As previously indicated by the Pennsylvania Department of Agriculture, adoptive pet owners will have up to 120 days from the time of adoption (timeframe to be re-evaluated as necessary) to have a procedure completed.

**Administration of Vaccinations**

In consultation with the Pennsylvania Department of Agriculture and the Bureau of Dog Law, the Pennsylvania Department of Health is recommending the following protocols be followed regarding vaccines:

- Core vaccines required by a dog or cat under one year of age are considered essential to ensure immunity against diseases such as Parvo, Panleukopenia, Distemper, Rabies, etc. and can be administered. First time rabies vaccines for all dogs are considered essential. Timing of these immunization should be based on potential risk to animal health tempered with risk of human-to-human exposure.
• For equine practitioners, vaccination against West Nile Virus, Eastern Equine Encephalitis/Western Equine Encephalitis/Tetanus, or other diseases that in the veterinarian’s medical opinion may be deadly or have long-term negative health effects, can be administered in addition to rabies vaccine. Timing of these immunization should be based on potential risk to animal health tempered with risk of human-to-human exposure. Necessary foal and pregnant mare vaccinations and vaccinations for high-risk patients (e.g., adult horse with no prior botulism vaccination moved to high-risk premises) can also be administered. Individual animal health issues must be considered when deciding which vaccines to administer and when. Diagnostic testing such as, but not limited to, Equine Infectious Anemia and Equine Piroplasmosis Testing required for interstate movement may be completed. Strictly, vaccination clinics or equine health clinics should not be conducted in counties under phase red of the emergency period, as these may lead to congregating of owners, increasing the potential for COVID-19 transmission. Social distancing must be maintained whenever possible by veterinarians and owners when conducting vaccinations in barns or other settings.

• If an animal is older than one year of age and has no discernible vaccine history, core vaccines for that animal may be considered essential and may be administered at the discretion of the veterinarian.

• Kennel owners certified by Pennsylvania Department of Agriculture to administer their own rabies vaccinations should continue to do so, following their regular schedule.

• All pet owners must ensure their animals are vaccinated and in compliance with the Pennsylvania Rabies Law, with allowances to postpone rabies boosters from March 19, 2020 until 30 days after the date the owner’s home county moves to phase yellow. The Pennsylvania Department of Agriculture has obtained a limited waiver of Section 455.8(a)(3) of the Pennsylvania Rabies Act related to rabies revaccination deadlines, and the Bureau of Dog Law Enforcement will not issue citations to pet owners who fall under this limited waiver.

• When vaccines are administered, veterinary practices should follow CDC and AVMA guidelines on personal protection measures, including the use of PPE, and social distancing when possible, to ensure the safety of staff.
Use of Telemedicine/Telehealth

Under the emergency disaster declaration, veterinarians are permitted to use telemedicine to conduct patient visits within the bounds of a valid Veterinary-Client-Patient Relationship (VCPR). The necessity and importance of an in-person physical examination when establishing a VCPR cannot be overstated. However, during the COVID-19 pandemic, there may be instances when your best medical and professional judgment weighs in favor of establishing a VCPR without an in-person physical examination. When deciding how to proceed, consider all relevant facts, including:

- Reasons why the client is seeking care;
- Availability of in-person veterinary care in the client’s area at the time of the request;
- Level of risk to the animal if care is not provided;
- Any risk associated with establishing the VCPR without a physical examination;
- Risk of the transmission of COVID-19 to clients or staff.

The owner of the animal being treated via telemedicine without a physical examination should be informed that telemedicine without a physical examination is not in accordance with the usual standard of care, and could have adverse effects on the animal, especially when prescribing medications. Documentation of the appointment, examination and any suggested or required treatment must be kept. Complete documentation may not relieve a veterinarian of liability should your decisions lack sound medical or professional judgment and lead to bad outcomes.

Support Services for Small Animals

The Pennsylvania Department of Agriculture has issued guidance to animal shelters and boarding kennels. For guidance on animal transport during the ongoing COVID-19 pandemic please refer to the Association of Animal Welfare Advancement for regular updates regarding transport recommendations and guidance on a variety of other areas of animal welfare.

Providing Services During Phased Reopening

The Governor’s plan to reopen Pennsylvania utilizes a three-phase matrix to determine when counties and/or regions can begin to ease restrictions. Businesses in the commonwealth that are permitted to conduct in-person operations during the disaster emergency must take precautions to protect their employees, their employees’ families, and their communities. All businesses (including
those businesses whose in-person operations were originally closed and later permitted to reopen) conducting in-person operations must review and adhere to business and building safety orders and commit to ensuring the health and safety of their employees and the public.

The need to provide veterinary medicine services must be balanced against the risk of spreading COVID-19 to veterinary staff and within the community at large. Veterinary decisions should be based on the level of community spread and risk of transmission to clients and staff. Medical and professional judgment can - and should - evolve as the situation changes in each community. Procedures that could be delayed in mid-March may be more urgent now. For example, vaccinations that are becoming severely overdue, such as Lyme, lepto, parvo, rabies booster shots, and others, may be considered essential at this time.

Additionally, grooming services may be performed in areas that are in the yellow and green phases of reopening as long as businesses performing grooming services adhere to business guidance to mitigate the spread of COVID-19. Practices that are able to offer limited contact or zero-contact services should continue to do so, especially when working with clients who are at high risk for COVID-19 or those who request accommodations for their personal protection. This is especially important as counties and regions move through the phased reopening, which may involve additional restrictions if outbreaks occur in certain areas.

Moving forward, in counties that move from red to yellow, and from yellow to green, veterinary practices in Pennsylvania are encouraged to use their best professional judgment in determining the patients that can be safely seen in the clinic and those that can be treated through telemedicine. Please be aware that if a county goes back to red, the standards of care and practices for red counties will be re-implemented. Practices should maintain the social distancing standards already in place (curbside service, use of PPE, etc.). We trust that veterinarians will make the best decisions possible to preserve animal health, limit risk to employees, and protect public health and safety.