

Licensure

Licensure

General

Transition Council is proposing the development of regulation language related to licensure in accordance with Sections 14 and 93 (1) 12-14 of the [Veterinary Professionals Act, 2024](#) (VPA).

This regulation language will apply to both veterinarian and veterinary technician members.

Purpose

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for reviewing the education and credentials of applicants to determine whether they are competent to safely practice veterinary medicine. This will be achieved through the licensure process.

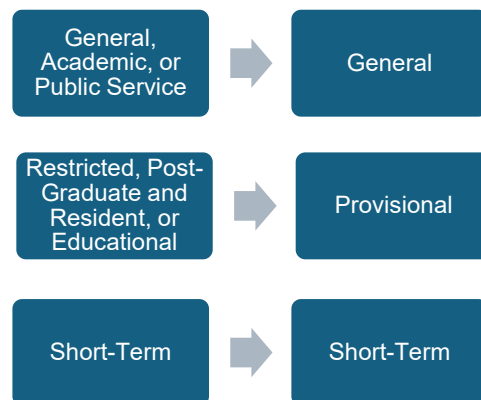
Overview

The CVPO will oversee two classes of licensure – one for veterinarians and one for veterinary technicians. Each class of licensure will have three subclasses – General, Provisional, and Short-Term.

The creation of new licensure categories will result in the need for existing licence types under the [Veterinarians Act](#) to transfer to one of the three subclasses.

Part One - Transfer of Veterinarian Licences

Veterinarians licensed under the *Veterinarians Act* will automatically have their licences transferred under the VPA with the same terms, conditions, and limitations that exist on their current licence. Some veterinarians who hold restricted licences with specific practice requirements (ex. specialists who hold licences to practice in their area of specialty) will be contacted prior to the full introduction of the new licensure model to transfer their licence to a new category under the VPA framework in order to accurately reflect the ways in which they practice. All veterinarians will continue to be able to practice in the same way that they are currently permitted.



Veterinarians licensed under the *Veterinarians Act* will be required to complete a module in veterinary jurisprudence related to the *VPA* within a timeframe determined by Transition Council. The completion of this module will not affect the transfer of a veterinarian's licence and will be a requirement for all current members.

Part Two - Veterinary Technicians Currently Registered with the Ontario Association of Veterinary Technicians (OAVT)

Veterinary technicians currently registered with the OAVT will have a specific pathway for applying for licensure with the CVPO. This will include the requirement to complete a module in veterinary jurisprudence related to the *VPA* within a timeframe determined by Transition Council.

Part Three - Application Process for New Members

All individuals who are not currently licensed under the *Veterinarians Act* will be required to submit an application for licensure to the CVPO including those veterinary technicians currently registered with the OAVT.

The application date for licensure with the CVPO has not yet been determined but will be communicated publicly prior to commencement.

Part Four – Additional Information Related to Licence Types

General Licence

This subclass of licence will be for applicants who are competent to provide the full scope of practice for veterinarians or veterinary technicians. It will also include applicants who have completed a limited licensure assessment or specialty that has confirmed competency in a narrowed scope of practice (including those limited to certain areas of public service, academia, specialty, or scope of practice). For the latter, terms, conditions, and/or limitations will be placed on the general licence based on the demonstrated competencies.

Provisional Licence

This subclass of licence will be for applicants who are actively undergoing a competency assessment process and will permit applicants to practice under the supervision of a veterinarian member while completing the requirements for a general licence. It will also include individuals who are completing an education program, internship, or residency.

This subclass will be time-limited and will be valid for three (3) years starting on the date that it is issued to ensure that applicants remain dedicated and active in their pursuit of a general licence.

Short-Term Licence

This subclass of licence will permit applicants to provide veterinary services in Ontario for a specific short-term purpose such as a state of emergency or specific locum arrangements.

Applicants for a short-term licence as a veterinarian will be required to obtain the Registrar's approval for their proposed work and to practice at or from an accredited veterinary facility

where the Veterinary Facility Director has assumed and confirmed responsibility to continue any care provided.

Applicants for a short-term licence as a veterinary technician will be required to obtain the Registrar's approval for their proposed work and to work under the delegation and supervision of a veterinarian member at or from an accredited facility where the Veterinary Facility Director has assumed and confirmed responsibility to continue any care provided.

Part Five - Other Notes

- There will be general application requirements for all applicants including those related to conduct (including background checks), eligibility to work, and language requirements. These requirements will be outlined at a higher level in regulation with additional details contained in CVPO policy. They will also be based on current processes.
- Specific competency requirements for veterinarians will be outlined in CVPO policy and will include proof of education (ex. DVM) and assessment(s) (ex. NAVLE, National Board Exams).
- Specific competency requirements for veterinary technicians will be outlined in CVPO policy and will include proof of education (ex. approved veterinary technician or veterinary technologist program) and assessment(s) (ex. VTNE).
- All applicants will be required to meet requirements related to veterinary jurisprudence.
- The Licensing Committee (formerly the Registration Committee) will retain its ability to waive or amend any of the licensing requirements for an applicant.

Licensure

Professional Misconduct

General

Transition Council is proposing the development of regulation language related to professional misconduct in accordance with Section 91 (1) 35 and 36 of the [Veterinary Professionals Act, 2024 \(VPA\)](#).

This regulation language will apply to both veterinarian and veterinary technician members unless otherwise specifically stated.

In recognition of the highly technical nature of professional misconduct, Transition Council is providing an outline of the different proposed categories to assist with clarity and understanding.

Purpose

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for overseeing the activities and behaviours that constitute professional misconduct to address and mitigate practice concerns as they arise.

Overview

The *VPA* offers the opportunity to ensure clarity and transparency around the different forms of professional misconduct and how they may be applied to professional practice. The *VPA* also offers the opportunity to highlight the importance of members practising within their sphere of competence.

The introduction of a one profession, two professionals model results in instances where more specific distinctions between which type of professional misconduct apply to which type of member will be required.

In addition to these overarching approaches, Transition Council is also proposing the inclusion of:

- Clauses related to the authorized activity model;
- Clauses related to quality assurance;
- Clear language related to ungovernable behaviour; and
- Formal recognition of animal abuse and neglect including animal abandonment clauses reflective of the *Provincial Animal Welfare Services Act*.

Specific Proposed Language

A draft version of potential regulatory language developed by the Transition Council can be below.

It is important to note that this draft language is not designed or intended to be viewed as the language that may eventually appear in a Regulation made under the *VPA*. Development of this

language is the responsibility of the legislative drafters of the Provincial Government and will be overseen by the Ontario Ministry of Agriculture, Food and Agribusiness.

Proposed Draft Language

For the purposes of the Act, professional misconduct includes the following:

1. An act or omission inconsistent with the Act, its Regulations or bylaws.
2. Failing to maintain the standard of practice of the profession including a published standard of the College.
3. Failing to fulfill the terms of an agreement with a client.
4. Discontinuing professional services unless,
 - i. the client requests the discontinuation; or
 - ii. the client is given a reasonable opportunity to arrange alternative services.
5. An act or omission relevant to the practice of veterinary medicine that, having regard to the circumstances, would be regarded by members as disgraceful, dishonourable, or unprofessional.
6. Conduct unbecoming a member.
7. Contravening any federal, provincial or territorial law or municipal by-law:
 - i. whose purpose is to protect or promote the health or welfare of animals or to protect and promote public health; or
 - ii. that is otherwise relevant to the member's suitability to practise.
8. Contravening a term, condition or limitation imposed on the member's licence.
9. Failing to reply appropriately to a written inquiry received from the College or failing to reply to the inquiry within the time specified in the inquiry or, if no time is specified, within 30 days after the day the inquiry was received by the member.
10. Providing information to the College that the member knows or ought to know is false or misleading.
11. Where an animal has died unexpectedly during, or as a result of, a veterinary procedure, failure on the part of a veterinarian member to promptly inform the client about the availability of a necropsy through another veterinarian.
12. Performing a professional service that the member knows or ought to know they do not have the knowledge, skill or judgment to perform.
13. Failing to take reasonable steps to prevent another member from committing or repeating an act of professional misconduct where the member knows or ought to know that an act of professional misconduct may be committed.

14. Failure on the part of a veterinarian member to advise a client to consult another veterinarian member where the member knows or ought to know that the client requires a service that the member does not have the knowledge, skill or judgment to offer or is beyond their scope of practice.
15. Practising the profession while the member's ability to do so is impaired or adversely affected by any substance, condition, dysfunction, disorder or circumstance that the member knows or ought to know impairs or adversely affects their ability to practise
16. Failing to comply with the Quality Assurance program or knowingly giving false information to the Quality Assurance Committee or an assessor.
17. Failing to appear before a panel of the Investigations and Resolutions Committee when directed to do so.
18. Failing to cooperate with the College or an investigator during an investigation or inquiry.
19. Failing to carry out or comply with an undertaking with the College or a Specified Continuing Education or Remediation Program or breaching an agreement with the College, a Committee of the College or the Registrar.
20. Failing to comply with a decision of a Committee or a panel of a Committee of the College.
21. Recommending or providing unnecessary treatment or continuing to treat a patient where the treatment is no longer indicated or has ceased to be effective.
22. Delivering to a patient or client any service for which consent is required by law, without such consent.
23. Practising the profession while the member's licence is under suspension.
24. Receiving any form of benefit from the practice of veterinary medicine while under suspension, unless prior approval has been given by the Registrar..
25. Abusing or harassing a client, a colleague, or a staff member verbally, physically, sexually, psychologically, or emotionally.
26. Abusing an animal.
27. Neglecting an animal or demonstrating disregard for the welfare of an animal.
28. Failing without reasonable cause to provide any documentation regarding any service provided to a client within a reasonable time after the client has requested such a document.
29. Failing to make or retain records in accordance with the standards of the profession or the published standards of the College.
30. Falsifying a record.
31. Signing or Issuing a document that the member knows or ought to know is false, misleading or otherwise improper.
32. On the part of a member holding a veterinarian licence, signing or

issuing a veterinary certificate, report or similar document that contains a statement that the member knows or ought to know is false, misleading or otherwise improper.

33. Failing to adequately ensure continuity of care by:

- a) Failing to make reasonable efforts to obtain necessary medical information about an animal or animals from the client and from previous treating professionals;
- b) Treating an animal receiving veterinary services from another member without notifying the other member;
- c) Failing to inform a client that uncoordinated veterinary services may place the animal at risk; or
- d) Failing without reasonable cause to forward relevant information regarding professional services within a reasonable time to another member, when requested to do so.

34. Making a misrepresentation to a client or prospective client.

35. Directly, or by implication, representing any person to be a member who is not a member

36. Using a name other than the member's name as set out in the register, in the course of providing or offering to provide veterinary services.

37. Using a facility name other than the facility name set out in the register, in the course of providing or offering to provide veterinary services.

38. Inappropriately using a term, title or designation in respect of the member's practice.

39. Inappropriately using a term, title or designation indicating or implying a specialization in the profession.

40. Failing to comply with the requirements of this Regulation regarding advertising.

41. Making a claim about a therapeutic approach, modality, remedy, treatment, device or procedure that is not based on evidence.

42. Permitting, counselling or assisting a person to perform an authorized activity that the person is not authorized to perform.

43. Performing an authorized activity that the member is not authorized to perform.

44. Performing an authorized activity where the performance of that activity is for an improper purpose.

45. Delegating an authorized activity in contravention of the Act or these regulations.

46. Performing an authorized activity without the necessary knowledge, skill and judgment to perform the authorized activity.

47. Delegating an authorized activity to a person without ensuring that person has the knowledge, skill and judgment to safely perform the authorized activity.

48. Failing to supervise appropriately.

49. Charging a fee that is excessive in relation to the services or products provided.

50. Charging a fee for an unperformed service, except a block fee in accordance with College standards or a fee for an appointment missed without at least twenty-four hours' notice.
51. Knowingly submitting a false or misleading account or charge for professional services.
52. Failing to itemize the services provided and related fees, including disbursements, when requested by a client.
53. Being a shareholder, officer or director of a professional corporation where the professional corporation does or omits to do anything that would be professional misconduct if done or omitted to be done by the member.
54. Failing to give reasonable notice when closing a veterinary facility permanently or for an extended period of time.
55. Establishing or operating a veterinary facility without a certificate of accreditation.
56. Contravening a term, condition or limitation imposed on a certificate of accreditation.
57. Failing to maintain any of the standards of accreditation.
58. Failing to cooperate with an inspector of the College.
59. If another member's licence is suspended or has been revoked, cancelled or terminated, a designated facility director doing any of the following related to the practice of veterinary medicine:
 - a. retains or uses the services of that member,
 - b. employs or is employed by the member,
 - c. maintains a partnership or association with the member or is a shareholder in a professional corporation in which the member is a shareholder or of which the member is an employee, or
 - d. directly or indirectly receives, makes or confers any remuneration or benefit from or to the member.
60. Practising the profession while in a conflict of interest.
61. Revealing information concerning a client, an animal or any professional service performed for an animal, to any person other than the client or another member treating the animal except,
 - i. with the consent of the client,
 - ii. if required or authorized to do so by law,
 - iii. to prevent, or contribute information for the treatment of, a disease or physical injury of a person, or
 - iv. for the purpose of identifying, locating or notifying the apparent owner of the animal, protecting the rights of the apparent owner or complying with applicable laws in respect

of the animal, where it appears that the animal is not owned by the person presenting it for treatment.

62. Failing to dispose of biological, pathological or hazardous wastes in accordance with the requirements of the *Environmental Protection Act* or, if there are no such requirements, in accordance with the standards of practice of the profession.

63. Failing on the part of a member to dispose of an animal, whether deceased or alive, or a part of it, in accordance with the client's instructions, except where:

- a. those instructions are not in accordance with the standards of practice of the profession; or
- b. a live animal is not claimed by the client within five days after completion of in-hospital treatment and convalescence or of an ancillary service, and:
 - i. the member has attempted to contact the client on at least five occasions and by at least two different methods;
 - ii. the member has made at least one attempt to contact the emergency contact identified by the client;
 - iii. the member has made a written records of the attempts described in subclauses (i) and (ii);
 - iv. the animal is transferred to an animal shelter or third-party owner; and
 - v. the written records described in subclause (iii) is retained for the shorter of five years or two years after the member ceases to practice veterinary medicine.

64. Selling or assigning any debt owed to the member for professional services to a third party, except for:

- a. accepting a credit card to pay for professional services;
- b. retaining a lawyer or agent to collect unpaid accounts; and
- c. making a general assignment of debts as collateral for a loan to finance the member's veterinary practice.

Licensure

Conflict of Interest

General

Transition Council is proposing the development of regulation language related to conflict of interest in accordance with Sections 93 (1) 35 and 36 of the [Veterinary Professionals Act, 2024 \(VPA\)](#).

This regulation language will apply to both veterinarian and veterinary technician members.

Purpose

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for overseeing the activities and behaviours that constitute professional misconduct in order to address and mitigate practice concerns as they arise. This includes when a member's professional judgement is unduly influenced by either personal or financial interests.

Overview

The requirement for a member to not be in a conflict of interest will be directly listed in regulation as an act of professional misconduct. Given the complexity of this topic, Transition Council is proposing the development of an additional subsection of regulation that specifically outlines what does and does not qualify as a conflict of interest to assist members in properly managing these concerns.

Focus on Behaviours

Transition Council is proposing the development of regulation language that focuses on the specific activities that may qualify as real or potential conflicts of interest to allow for consistent application across all sectors. This approach is a shift away from the current structure outlined in [Regulation 1093](#) made under the [Veterinarians Act](#) which is more focused on conflicts of interest arising from specific work places and/or arrangements.

Professional Judgement

Transition Council is proposing the development of regulation language that underscores the fundamental test associated with conflicts of interest – that a member must determine whether an interest may affect their professional judgement or may create a reasonable perception that their professional judgement has been influenced and take steps to avoid or manage the conflict.

Authorized Activity Model

Non-Delegable Activities

General

Transition Council proposes the development of regulation language related to non-delegable authorized activities in accordance with Section 9 (2) and (3) of the [Veterinary Professionals Act, 2024](#) (VPA).

Purpose

While the VPA establishes the framework for an authorized activity model, the development of additional detail required for full implementation is assigned to regulation.

Overview

The performance of certain authorized activities (or components of) carries a higher level of risk of harm or potential harm to animal(s) and/or the public that necessitates that they only be performed by veterinarian members and not be permitted to be delegated to either a veterinary technician member or an auxiliary.

Non-Delegable Authorized Activities

Transition Council proposes the development of regulation language that outlines that the following authorized activities (or components of) may only be performed by a veterinarian member:

- Communicating to an individual a diagnosis identifying a disease, disorder, dysfunction or presentation in circumstances in which it is reasonably foreseeable that the individual will rely on the diagnosis;
- Performing a medical assessment to determine the fitness for purpose or soundness of an animal or group of animals, on which it is reasonably foreseeable that a person or organization will rely on the assessment;
- Prescribing a drug;
- Performing major surgery; and
- Performing dental extractions.

Major surgery means surgery in which bone, viscera or an extensive area of subcutaneous tissue is exposed, or the failure of which would endanger the life or organ function of the animal.

Specific Allowances for Veterinary Technician Members

Transition Council proposes that the above authorized activities (or components of) be non-delegable except when:

- A veterinary technician member is providing confirmation of a death of an animal or group of animals to an individual;
- A veterinary technician member is communicating a veterinarian's diagnosis to an individual based on the veterinarian's delegation and the veterinarian remains readily available to communicate with the individual; or

- A veterinary technician member is providing confirmation of pregnancy in a food producing animal following the application of transabdominal diagnostic ultrasound.

Other Notes

- Communicating a diagnosis as non-delegable does not prevent a veterinary technician member or auxiliary from performing a clinical assessment as this is a separate activity from making or communicating a diagnosis.
- The authorized activity of performing a medical assessment is designed to ensure ongoing regulatory oversight of the medical assessment of an animal(s) or group of animals by veterinarian members related to fitness for sale and/or slaughter. It is also designed to cover any instance where a veterinarian member's signature would be viewed by the public as an indication that a medical assessment has been completed. This authorized activity does not intend nor seek to limit clinical assessments of an animal(s) or group of animals' overall fitness and health.
- The inability to delegate the performance of major surgery does not disallow a veterinarian member from having a veterinary technician member or auxiliary assist them in the performance of surgery but these roles must be secondary to the veterinarian member's primary performance.
- While the performance of dental extractions will be non-delegable, there will be opportunity through CVPO policy to distinguish what does and does not qualify as a dental extraction.

Authorized Activity Model

Delegation

General

Transition Council is proposing the development of regulation language related to delegation in accordance with Section 9 (2) and (3) of the [Veterinary Professionals Act, 2024](#) (VPA).

Purpose

While the VPA establishes the framework for an authorized activity model, the development of additional detail required for full implementation is assigned to regulation.

Overview

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for ensuring the delivery of safe and quality veterinary medicine by its members including within the dynamics of veterinary teams where there may be different providers and methods of service delivery being utilized.

Delegation by Veterinarian Members

Transition Council proposes the development of regulation language that outlines the circumstances in which veterinarian members will be permitted to delegate the practice of clinical veterinary medicine (including authorized activities). This includes:

- That a veterinarian is permitted to delegate the practice of clinical veterinary medicine (including authorized activities) to either a veterinary technician member or a non-member (auxiliaries) working under either their immediate, direct, or indirect supervision;
- That a veterinarian member remains professionally responsible for their decision to delegate and the level of supervision provided;
- That a veterinarian is required to ensure that the veterinary technician member or non-member to whom they are delegating can perform the task competently and safely;
- That the veterinarian member only delegate the performance of tasks that they themselves are also able to perform competently and safely; and
- That a veterinarian member remains professionally responsible for the conduct of the veterinary technician member or non-member to whom they have delegated and for the suitability and quality of the performance of said activities.

Veterinary Technician Members Working Under a Veterinarian Member's Delegation

Transition Council proposes the development of regulation language that permits a veterinary technician member to choose to accept the delegation of the performance of clinical veterinary medicine (including authorized activities) from a veterinarian member if they are competent to perform the activity. The veterinary technician member will be held professionally responsible for their performance of these tasks in recognition of their status as a licensed member and their ongoing obligation to use their professional judgement in practice.

Sub-Delegation by Veterinary Technician Members Not Permitted

Transition Council proposes the development of regulation language that states that sub-delegation of authorized activities by veterinary technician members is not permitted. Sub-delegation occurs when an individual who accepts the delegation of an activity then delegates the act to another individual.

Other Notes

- The three levels of supervision (immediate, direct, indirect) are currently contained in [Regulation 1093](#) under the [Veterinarians Act](#) and will be carried forward.

Authorized Activity Model

Orders

General

Transition Council proposes the development of regulation language related to orders in accordance with Section 9 (2) of the [*Veterinary Professionals Act, 2024*](#) (VPA).

Purpose

The one profession, two professionals model enables the development of new approaches to veterinary practice that seek to fully utilize the skillset possessed by veterinary technicians to assist with public access to veterinary care. While the VPA establishes the framework for this approach, the development of additional detail required for full implementation is assigned to regulation.

Overview

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for ensuring the delivery of safe and quality veterinary care by its members including within the dynamics of veterinary teams where there may be different providers and methods of service delivery being utilized.

Definition of Order

Transition Council proposes that the regulation contain the following definition of order:

Order means the process whereby a veterinarian member may direct a veterinary technician member to perform an authorized activity or set of authorized activities for a specific routine treatment plan or purpose pursuant to the conditions set out in this Regulation.

This definition is designed to provide context related to the development and use of orders and a framework upon which further detail can be developed. This framework is being proposed based on existing structures and processes that exist in human healthcare, as well as in recognition that similar processes already exist in areas of veterinary medicine, such as the use of standard operating procedures (SOPs).

Orders and the Veterinarian-Client-Patient Relationship (VCPR)

Transition Council proposes that orders be permitted within a VCPR. In recognition of the emergent nature in which this tool may be used, Transition Council also proposes that orders be permitted outside of a VCPR.

Orders and Informed Client Consent

Transition Council proposes that regulation confirm that a veterinary technician member is required to obtain informed client consent whenever possible before proceeding under a veterinarian member's order regardless of whether a VCPR has been established.

Further Parameters

Transition Council proposes that the regulation outline the circumstances in which veterinarian members are permitted to develop orders and veterinary technician members are permitted to practice under a veterinarian member's order.

Veterinarian Members	Veterinary Technician Members
<ul style="list-style-type: none">• Required to develop orders in writing.• Can only develop orders for authorized activities that they themselves are competent to perform.• Must ensure that the veterinary technician member(s) practising pursuant to their order are competent to perform the included authorized activities.• Remain professionally responsible for the proper development and oversight of orders.• Must remain readily available to perform the authorized activities if required or requested.	<ul style="list-style-type: none">• Required to only perform authorized activities that they are competent to perform.• Remain able to refuse to perform authorized activities that they are not competent in or comfortable with.• Remain professionally responsible for the decision to practice under a veterinarian's order as well as their own performance.• Remain professionally responsible for ensuring adherence to a veterinarian member's order as written.• Remain professionally responsible for coordinating with a veterinarian member when care falls outside of the parameters of an order.

Authorized Activities Permitted for Use in Orders

Transition Council proposes that all delegable authorized activities be permitted to be used in orders.

Other Notes

- Orders would only be permitted to be used from accredited veterinary facilities and in accordance with the facility policies established by the Veterinary Facility Director.
- The overarching recommendations related to orders have been developed in recognition of the enhanced level of professional judgement, decision-making, and accountability that would be required of both veterinarian and veterinary technician members in these cases.
- Veterinarian members would be permitted to develop orders that outline the ways in which veterinary technician members can perform authorized activities. In this, a veterinarian member could include requirements related to supervision but could also permit a veterinary technician member to independently perform authorized activities if they adhere to the requirements of the order and CVPO policies, such as those relating to prescribing and dispensing.
- While orders are primarily designed to facilitate the performance of authorized activities, a veterinarian member would also be permitted to include other aspects of clinical veterinary medicine within an order for performance by a veterinary technician member.
- Sub-delegation of authorized activities practised under a veterinarian member's order will not be permitted.

Authorized Activity Model

Initiation

General

Transition Council proposes the development of regulation language related to initiation in accordance with Section 9 (2) of the [*Veterinary Professionals Act, 2024*](#) (VPA).

Purpose

The one profession, two professionals model enables the development of new approaches to veterinary practice that seek to fully utilize the skillset possessed by veterinary technicians to assist with public access to veterinary care. While the VPA establishes the framework for this approach, the development of additional detail for full implementation is assigned to regulation.

Overview

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for ensuring the delivery of safe and quality veterinary care by its members including within the dynamics of veterinary teams where there may be different providers and methods of service delivery being utilized.

Definition of Initiation

Transition Council proposes that the regulation contain the following definition of initiation:

Initiation means where a veterinary technician member is permitted to independently perform authorized activities without an order or delegation by a veterinarian member pursuant to the conditions set out in this Regulation.

This definition is designed to provide context related to the process of initiation and a framework upon which further detail can be developed.

Initiation and the Veterinarian-Client-Patient Relationship (VCPR)

Transition Council proposes that initiation be permitted within a VCPR. In recognition of the emergent nature in which this tool may be used, Transition Council also proposes that initiation be permitted outside of a VCPR.

Initiation and Informed Client Consent

Transition Council proposes that the regulation confirm that a veterinary technician member is required to obtain informed client consent whenever possible before proceeding through their own initiation regardless of whether a VCPR has been established.

Further Parameters

Transition Council proposes that the regulation outline the circumstances in which veterinary technician members are permitted to perform certain authorized activities through initiation.

Veterinary Technician Members Practising Through Initiation
<ul style="list-style-type: none"> • Must have the knowledge, skills, and judgement to perform the authorized activity safely, effectively, and ethically. • Required to determine that the animal(s) or group of animals' condition warrants the performance of the authorized activity having considered: <ul style="list-style-type: none"> ○ The known risks and benefits to the animal(s) or group of animals of performing the authorized activity; ○ The predictability of the outcome of performing the authorized activity; and ○ The safeguards and resources available in the circumstances to safely manage the outcome of performing the authorized activity. • Remains professionally responsible for determining that the animal(s) or group of animals' condition warrants performance of the authorized activity. • Remains professionally responsible for the performance of the authorized activity. • Required to coordinate care of the animal(s) or group of animals with a veterinarian member at the earliest opportunity.

Authorized Activities Permitted to be Performed by a Veterinary Technician Member Through Initiation

Transition Council proposes that the following authorized activities (or components of) be permitted to be practised by a veterinary technician member through initiation:

- Communicating to an individual the death of an animal or group of animals
- Ordering the following laboratory tests on an animal or on specimens taken from an animal:
 - Preliminary Hematology
 - Preliminary Urinalysis
 - Preliminary Cytology
 - Preliminary Serology
 - Preliminary Parasitology
- Performing a procedure below the dermis for the purpose of:
 - Taking a blood sample
 - Taking a punch biopsy
 - Taking a skin scrape
 - Cystocentesis
 - Fine needle aspiration
 - Placing an IV catheter
- With respect to the care of a wound below the dermis or below a mucous membrane, any of the following procedures:
 - Cleansing
 - Probing

- Compressing
- Dressing
- Putting an instrument, arm, hand, or finger:
 - Beyond the larynx to place esophageal or endotracheal tubing
 - Beyond the opening of the urethra to place a urinary catheter
 - Beyond the point of the animal's nasal passage where they normally narrow to collect a swab sample or place nasogastric tubing
 - Beyond the labia majora to conduct a vaginal or cervical exam or collect a swab sample.
 - Beyond the anus or cloaca to check an animal's temperature
 - Beyond the anus to perform internal anal gland expression
- Immobilizing a fracture of a bone or a dislocation of a joint or severed tendon for the purpose of temporary stabilization
- Administering a substance by inhalation for the purpose of administering oxygen
- Administering a substance by injection for the purpose of fluid therapy as long as said substance is not a drug.

Other Notes

- Initiation would only be permitted to be used from accredited veterinary facilities and in accordance with the facility policies established by the Veterinary Facility Director.
- The overarching recommendations related to initiation have been developed in recognition of the enhanced level of professional judgement, decision-making, and accountability that would be required of veterinary technician members in these cases.
- The proposed list of authorized activities (or components of) for veterinary technician members to perform through initiation has been developed based on extensive risk-based research and analysis. The proposed list has also been informed and guided by the core competencies developed by the Ontario Association of Veterinary Technicians that outline the skills that all veterinary technicians should possess upon completion of their education and training.
- The process of initiation is designed for the performance of authorized activities and does not prevent veterinary technician members from initiating other forms of clinical veterinary medicine from an accredited veterinary facility in accordance with facility policies.
- Sub-delegation of authorized activities practised through initiation will not be permitted.

Authorized Activity Model

Forms of Energy

General

Schedule One of the [*Veterinary Professionals Act, 2024*](#) (VPA) outlines a list of seventeen (17) authorized activities. One of these authorized activities is the applying or ordering of a prescribed form of energy.

As the wording of the authorized activity indicates the need to provide further details in regulation, Transition Council proposes the development of regulation language to outline the forms of energy that qualify under this framework.

Purpose

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for overseeing the performance of activities that pose a high risk of harm or potential harm to an animal(s) or group of animals and/or the public. The authorized activities listed in Schedule One of the VPA pose the highest risk of harm or potential harm and require additional safeguards and accountability surrounding their performance.

Forms of Energy to Be Included

Transition Council proposes that the following forms of energy qualify as an authorized activity when used or ordered for use on an animal(s) or group of animals:

- Any form of energy that employs or produces ionizing radiation (including radiography and computed tomography)
- Magnetic resonance imaging
- Any form of energy used in surgery (laser surgery; lithotripsy; cryosurgery; radiosurgery; etc.)
- Diagnostic ultrasound
- Focused and radial shockwave
- Lasers in Class IV or above

Other Notes

- These forms of energy were identified based on a significant research and risk-based analysis that was conducted over several years.

Authorized Activity Model

Specific Exemptions for Members

General

Transition Council proposes the development of regulation language related to the ways that members are permitted to practice clinical veterinary medicine in accordance with Section 9 (2) of the [Veterinary Professionals Act, 2024](#) (VPA).

Purpose

The one profession, two professionals model enables the development of new approaches to veterinary practice that seek to fully utilize the skillset possessed by veterinary technicians to assist with public access to veterinary care. While the VPA establishes the framework for this approach, the development of additional detail for full implementation is assigned to regulation.

Overview

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for ensuring the delivery of safe and quality veterinary care by its members including within the dynamics of veterinary teams where there may be different providers and methods of service delivery being utilized.

Common Approach

Unless otherwise specifically stated, all members (both veterinarians and veterinary technicians) will be required to practice clinical veterinary medicine, including authorized activities, through an accredited veterinary facility in accordance with the facility policies set by the Veterinary Facility Director.

Members Working as Employees of the Crown

Transition Council proposes the development of regulation language that allows members to practice outside of an accredited veterinary facility if they are working as an employee of the Crown. Examples include working for the Canadian Food Inspection Agency or the Ontario Ministry of Agriculture, Food, and Agribusiness.

Members Working Under the Oversight of Other Legislation

Transition Council proposes the development of regulation language that allows members to practice outside of an accredited veterinary facility if they are working under the oversight of another piece of federal or provincial legislation, such as the *Animals for Research Act*.

Veterinary Technician Members Working Under a Veterinarian Member's Treatment Plan

Transition Council proposes the development of regulation language that permits veterinary technician members to provide lower-risk activities (ex. handling and restraint, clinical assessment, non-invasive health monitoring) and certain authorized activities (ex. administering

a substance by injection or inhalation, taking blood or lab samples) outside of an accredited facility if:

- The veterinary technician member is working under a veterinarian member's treatment plan;
- The treatment plan is first created by a veterinarian member who maintains a veterinarian-client-patient relationship (VCPR) with the owner of the animal(s) or group of animals inclusive of providing after-hours veterinary care and managing adverse reactions;
- The veterinary technician member is hired and/or contracted by the owner of the animal(s) or group of animals to perform the services outlined in the treatment plan and performs the services from the owner's location;
- The veterinary technician member adheres to the treatment plan created by the veterinarian member and does not deviate from or expand upon it;
- The veterinary technician member uses the supplies provided by the veterinarian member (including drugs) in accordance with the treatment plan; and
- The veterinary technician member provides a report of the services delivered directly to the veterinarian member who created the treatment plan.

The development of this regulatory allowance would require a specific list of the authorized activities (or components of) permitted to be performed by veterinary technicians in this manner.

Veterinary Technician Members Working based Upon A Written Referral From A Veterinarian Member

Transition Council proposes the development of regulation language that permits veterinary technician members to perform lower risk activities (ex. clinical assessment, massage, water treadmill therapy) and certain authorized activities (spinal manipulation, laser therapy, radial shockwave therapy) outside of an accredited veterinary facility if:

- The veterinary technician member receives a written referral from a veterinarian member who maintains a VCPR with the owner of the animal(s) or group of animals inclusive of providing after-hours veterinary care and managing adverse reactions; and
- The veterinary technician member provides a report of the services delivered directly to the veterinarian member who provided the referral.

The development of this regulatory allowance would require a specific list of the authorized activities (or components of) permitted to be performed by veterinary technicians in this manner.

Veterinary Technicians Employed by a Non-Veterinary Animal Care Provider Operating Under Certain Statutory Exceptions or Regulatory Exemptions

Transition Council proposes the development of regulation language that permits veterinary technician members to perform certain authorized activities outside of an accredited facility if they are employed by a non-veterinary animal care provider who is permitted to offer certain authorized activities by way of a statutory exception or regulatory exemption under the *VPA*. This will include:

- If the veterinary technician member is working for a business that engages in artificial insemination of livestock for the purpose of collecting or using semen, implanting embryos in cattle, and/or administration of heat synchronization injections; and/or
- If the veterinary technician member is working for a business that offers confirmation of pregnancy through blood or milk analysis.

Other Notes

- The outlined approaches have been designed to reflect the current ways in which veterinary medicine is practised while also ensuring that the roles that veterinarians and veterinary technicians have currently established outside of accredited facilities have opportunities to continue with appropriate public safeguards under the *VPA*. This includes members working as employees of the Crown or under the oversight of other federal or provincial legislation.
- In particular, these approaches have been designed to reflect existing veterinary technician businesses that operate in the spheres of in-home mobile care and animal rehabilitation.
- Under the new statutory framework of the *VPA*, both veterinarians and veterinary technicians will continue to be able to own businesses. The Act does not oversee the ownership of businesses and instead defines the ways in which these services may be offered.

Regulatory Exemptions for Non-Members

Chiropractors

General

Section 9 (5) 1 of the [Veterinary Professionals Act, 2024](#) (VPA) states that regulation language may be developed to allow for “a person who, under the *Chiropractic Act, 1991*, is a member of the College of Chiropractors of Ontario” to carry out any such authorized activities as may be prescribed in accordance with any prescribed guidelines, processes, terms, conditions, limitations, or prohibitions.

Purpose

One of the key characteristics of the VPA is that it formally recognizes animal care as a system in which both veterinary and non-veterinary animal care providers exist. Most of the animal care services provided by non-veterinary animal care providers fall outside of the authorized activity model and exist in the public domain. Some activities, however, cross over and require the development of regulatory exemptions for the delivery of services to continue. Given this, Transition Council has conducted a risk and public interest-based analysis of potential allowances for non-veterinary animal care providers and is proposing various regulatory exemptions for certain persons and/or activities.

Overview

Certain chiropractors who have received additional education in animal care possess a specific set of skills, knowledge, and training that allows them to safely perform some authorized activities.

Primary Qualifications

Transition Council proposes the development of a regulatory exemption for chiropractors who are duly registered members of the College of Chiropractors of Ontario (CCO) in the general class (subject to any terms, conditions or limitations that may exist on their certificate of registration). Transition Council also proposes that this regulatory exemption require chiropractors to comply with all current practice standards of the College of Chiropractors of Ontario including those specific to animal care.

Additional Qualifications

In addition to the requirement to be registered with the CCO, Transition Council proposes that a regulatory exemption for chiropractors also require adherence with the following guidelines, processes, terms, conditions, limitations, and/or prohibitions:

- The chiropractor must have at least 200 hours of specific training in animal chiropractic which includes practical experience;
- The chiropractor must have at least 35 hours of additional training in chiropractic acupuncture on animals which includes practical experience (in addition to the 200 hours in human acupuncture training required by the CCO); and

- The chiropractor must have the knowledge, skill, and judgement to:
 - Perform the authorized activity safely, effectively, and ethically; and
 - Determine the animal's condition warrants performance of the authorized activity based on the known risks and benefits.

The requirement for hours related to chiropractic acupuncture will only be required for those chiropractors who seek to provide this service.

Specific Requirement for Chiropractic Acupuncture

In recognition of currently available chiropractic training, Transition Council proposes that chiropractors only be permitted to perform canine and/or equine chiropractic acupuncture, dependent on their individual species-specific training.

Authorized Activities Permitted to be Performed by Chiropractors

Transition Council proposes that any chiropractor who meets the above-mentioned criteria be permitted to perform the following authorized activities:

- Communicating a chiropractic diagnosis identifying as the cause of an animal's symptoms,
 - a disorder or dysfunction arising from the structures or functions of the spine and their effects on the nervous system, or
 - a disorder or dysfunction arising from the structures or functions of the joints of the extremities;
- Performing a procedure on tissue below the dermis for the purpose of administering chiropractic acupuncture;
- Moving the joints of the spine beyond the animal's usual physiological range of motion using a fast, low amplitude thrust;
- Putting a finger beyond the anus for the purpose of manipulating the tailbone; and
- Applying and ordering the application of the following forms of energy for therapeutic purposes:
 - Class IV lasers; and
 - Radial shockwave when sedation is not required.

Other Notes

- Chiropractors will not be required to provide proof of their eligibility under the regulatory exemption to the College of Veterinary Professionals of Ontario (CVPO). Instead, chiropractors will be expected to review the regulatory exemption and determine whether they meet the requirements.
- Should the CVPO become aware of a chiropractor who is offering authorized activities to the public who may not meet requirements, the CVPO will have the ability to investigate these concerns including requiring proof of eligibility and adherence. The CCO will also be able to investigate their members' practice in animal care.
- Communicating a chiropractic diagnosis related to a disorder or dysfunction of the spine or joints is part of the scope of practice for chiropractors under the *Regulated Health*

Professionals Act, 1991. Proper communication of these diagnoses is outlined in the CCO's standards of practice. It is important to note that these proposed allowances for animal care pertain only to disorders and dysfunctions, and do not allow for any form of diagnosis related to diseases or conditions.

Regulatory Exemptions for Non-Members

Pharmacy Professionals

General

Section 9 (5) 2 of the [Veterinary Professionals Act, 2024](#) (VPA) states that regulation language may be developed to allow for “a person who, under the *Pharmacy Act, 1991*, is a member of the Ontario College of Pharmacists” to carry out any such authorized activities as may be prescribed in accordance with any prescribed guidelines, processes, terms, conditions, limitations, or prohibitions.

Purpose

One of the key characteristics of the VPA is that it formally recognizes animal care as a system in which both veterinary and non-veterinary animal care providers exist. Most of the animal care services provided by non-veterinary animal care providers fall outside of the authorized activity model and exist in the public domain. Some activities, however, cross over and require the development of regulatory exemptions for the delivery of services to continue. Given this, Transition Council has conducted a risk and public interest-based analysis of potential allowances for non-veterinary animal care providers and is proposing various regulatory exemptions for certain persons and/or activities.

Overview

Many pharmacy professionals possess a specific set of skills, knowledge, and training that allows them to safely perform some authorized activities.

Qualifications

Transition Council proposes the development of a regulatory exemption for pharmacy professionals (pharmacists and pharmacy technicians) who are duly registered members of the Ontario College of Pharmacists (OCP) in the Part A Class (subject to any terms, conditions or limitations that may exist on their certificate of registration). Transition Council also proposes that this regulatory exemption require pharmacy professionals to comply with all current practice standards of the OCP including those specific to animal care.

Authorized Activities Permitted to be Performed by Pharmacy Professionals

Transition Council proposes that any pharmacy professional who meets the above-mentioned criteria be permitted to perform the following authorized activity:

- Compounding, dispensing, or selling a drug based on a veterinary prescription.

Other Notes

- Pharmacy professionals are currently permitted to dispense, compound, or sell drugs for animals under the [Veterinarians Act](#). This proposed regulatory exemption mirrors these current allowances.

- Pharmacy professionals will not be required to provide proof of their eligibility under the regulatory exemption to the College of Veterinary Professionals of Ontario (CVPO). Instead, pharmacy professionals will be expected to review the regulatory exemption and determine whether they meet the requirements.
- Should the CVPO become aware of a pharmacy professional who is offering authorized activities to the public who may not meet requirements, the CVPO will have the ability to investigate these concerns including requiring proof of eligibility and adherence. The OCP will also be able to investigate their members' practice in animal care.
- Part of Transition Council's confirmation of this regulatory concept included recognition of the OCP's willingness to develop a specific standard of practice related to their members' practice on animals and a commitment to ensuring cooperation between the two Colleges in the development of this work.

Regulatory Exemptions for Non-Members

Animal Rehabilitation

General

Section 9 (5) 3 of the [Veterinary Professionals Act, 2024](#) (VPA) states that regulation language may be developed to allow for “a person who belongs to or practises a prescribed profession or such other persons as may be prescribed” to carry out any such authorized activities as may be prescribed in accordance with any prescribed guidelines, processes, terms, conditions, limitations, or prohibitions.

Purpose

One of the key characteristics of the VPA is that it formally recognizes animal care as a system in which both veterinary and non-veterinary animal care providers exist. Most of the animal care services provided by non-veterinary animal care providers fall outside of the authorized activity model and exist in the public domain. Some activities, however, cross over and require the development of regulatory exemptions for the delivery of services to continue. Given this, Transition Council has conducted a risk and public interest-based analysis of potential allowances for non-veterinary animal care providers and is proposing various regulatory exemptions for certain persons and/or activities.

Overview

Certain persons who have received instruction in animal rehabilitation possess a specific set of skills, knowledge, and training that allows them to safely perform some authorized activities.

Qualifications

Transition Council proposes the development of a regulatory exemption for persons trained in animal rehabilitation who adhere to the following guidelines, processes, terms, conditions, limitations, and/or prohibitions:

- The person has formal, recognized education in either animal or human anatomy that garners entry into a profession in animal or human medicine.
- The person must have at least 125 hours of training in animal rehabilitation which includes practical experience;
- The person must have the knowledge, skill, and judgement to:
 - Perform the authorized activity safely, effectively, and ethically; and
 - Determine the animal’s condition warrants performance of the authorized activity based on the known risks and benefits.
- The person ensures appropriate coordination and consultation with a veterinarian member in the delivery of animal rehabilitation including making referrals when required.

Authorized Activities Permitted to be Performed by Persons Providing Animal Rehabilitation

Transition Council proposes that any person who meets the above-mentioned criteria be permitted to perform the following authorized activities:

- Applying and ordering the following forms of energy for therapeutic purposes:
 - Class IV lasers; and
 - radial shockwave when sedation is not required.

Other Notes

- Persons under this regulatory exemption will not be required to provide proof of their eligibility under the regulatory exemption to the College of Veterinary Professionals of Ontario (CVPO). Instead, a person will be expected to review the regulatory exemption and determine whether they meet the requirements.
- Should the CVPO become aware of a person who is offering authorized activities to the public who may not meet requirements, the CVPO will have the ability to investigate these concerns including requiring proof of eligibility and adherence and will be able to pursue its own investigation under either unauthorized practice and/or the risk of harm clause if warranted.
- Transition Council considered whether persons with animal rehabilitation training could also be permitted to perform therapeutic acupuncture on animals. Upon review, Transition Council determined that this was not in the public interest since acupuncture is a high-risk activity and there are no other regulators or legal bodies outside of the CVPO that would be responsible for overseeing a person's practice in this area.

Regulatory Exemptions for Non-Members

Farriers and Hoof Trimmers

General

Section 9 (5) 3 of the [Veterinary Professionals Act, 2024](#) (VPA) states that regulation language may be developed to allow for “a person who belongs to or practises a prescribed profession or such other persons as may be prescribed” to carry out any such authorized activities as may be prescribed in accordance with any prescribed guidelines, processes, terms, conditions, limitations, or prohibitions.

Purpose

One of the key characteristics of the VPA is that it formally recognizes animal care as a system in which both veterinary and non-veterinary animal care providers exist. Most of the animal care services provided by non-veterinary animal care providers fall outside of the authorized activity model and exist in the public domain. Some activities, however, cross over and require the development of regulatory exemptions for the delivery of services to continue. Given this, Transition Council has conducted a risk and public interest-based analysis of potential allowances for non-veterinary animal care providers and is proposing various regulatory exemptions for certain persons and/or activities.

Overview

Certain persons who have received instruction in either farriery or hoof trimming possess a specific set of skills, knowledge, and training that allows them to safely perform some authorized activities.

Qualifications

Transition Council proposes a regulatory exemption for persons trained in farriery or hoof trimming who adhere to the following guidelines, processes, terms, conditions, limitations, and/or prohibitions:

- The person must have specific training in providing farrier or hoof trimming services which includes practical experience; and
- The person must have the knowledge, skill, and judgement to:
 - Perform the authorized activity safely, effectively, and ethically; and
 - Determine the animal’s condition warrants performance of the authorized activity based on the known risks and benefits.

Authorized Activities Permitted to be Performed by Persons Providing Farriery or Hoof Trimming Services

Transition Council proposes that any person who meets the above-mentioned criteria be permitted to perform the following authorized activity:

- Performing a procedure below the dermis if it remains within or below the coronary band and within the structure of the hoof.

Other Notes

- Persons under this regulatory exemption will not be required to provide proof of their eligibility under the regulatory exemption to the College of Veterinary Professionals of Ontario (CVPO). Instead, a person will be expected to review the regulatory exemption and determine whether they meet the requirements.
- Should the CVPO become aware of a person who is offering authorized activities to the public who may not meet requirements, the CVPO will have the ability to investigate these concerns including requiring proof of eligibility and adherence and will be able to pursue its own investigation under either unauthorized practice and/or the risk of harm clause if warranted.

Regulatory Exemptions for Non-Members

Mass Culls of Livestock and Poultry

General

Section 93 (7) iv. of the [*Veterinary Professionals Act, 2024*](#) (VPA) allows for the development of regulatory exemptions permitting persons who are not members to carry out specified authorized activities and limiting and governing the carrying out of such activities.

Purpose

The public expects that the College of Veterinary Professionals of Ontario (CVPO) will continue to oversee the performance of activities that pose a risk of harm or potential harm to an animal(s) or group of animals and/or people. In this oversight, however, the VPA provides the ability to recognize that there are times where veterinary performance of an activity may not be the only, or best, way of delivering a service. This includes circumstances where actions may be taken to ensure population management and/or disease control.

Overview

Certain persons who have received instruction in the performance of mass culls possess a specific set of skills, knowledge, and training that allows them to safely perform some authorized activities.

Qualifications

Transition Council proposes the development of a regulatory exemption for persons performing mass culls of livestock and poultry who adhere to the following guidelines, processes, terms, conditions, limitations, and/or prohibitions:

- The person must have specific training in administering substances by inhalation for the purpose of mass culls in livestock and/or poultry developed with veterinarian oversight that includes practical experience;
- The person must carry out the authorized activities in accordance with the Codes of Practice for the care and handling of farm animals; and
- The person must have the knowledge, skill, and judgement to:
 - Perform the authorized activity safely, effectively, and ethically; and
 - Determine the animal's condition warrants performance of the authorized activity based on the known risks and benefits.

Authorized Activities Permitted to be Performed by Persons Providing Mass Culls of Livestock and Poultry

Transition Council proposes that any person who meets the above-mentioned criteria be permitted to perform the following authorized activities:

- Administering a substance by inhalation and/or monitoring of such inhalation; and
- Communicating to an individual the death of an animal or group of animals.

Other Notes

- Adherence to the Codes of Practice has been included in recognition of their development as scientifically informed, and practical expectations for responsible farm animal care. They are also developed with multi-stakeholder input including that of veterinary professionals.
- Persons under this regulatory exemption will not be required to provide proof of their eligibility under the regulatory exemption to the CVPO. Instead, a person will be expected to review the regulatory exemption and determine whether they meet the requirements.
- Should the CVPO become aware of a person who is offering authorized activities to the public who may not meet requirements, the CVPO will have the ability to investigate these concerns including requiring proof of eligibility and adherence and will be able to pursue its own investigation under either unauthorized practice and/or the risk of harm clause if warranted.

Regulatory Exemptions for Non-Members

Embryo Implantation in Cattle

General

The [Veterinary Professionals Act, 2024](#) (VPA) permits the development of regulatory exemptions to further clarify and/or limit the statutory exceptions contained in Schedule One of the Act.

Purpose

The public expects that the College of Veterinary Professionals of Ontario (CVPO) will continue to oversee the performance of activities that pose a risk of harm or potential harm to an animal(s) or group of animals and/or people. Research has indicated that many forms of embryo implantation continue to pose a high risk of harm or potential harm.

Recommended Limitation

Transition Council proposes the development of a regulatory exemption that further limits the performance of the following statutory exception outlined in Schedule One of the VPA to cattle:

Implantation of embryos as part of a business that engages in artificial insemination of livestock.

Additional Recommendations for Qualification Under the Statutory Exception and Regulatory Exemption

In addition to limiting the statutory exception to performance only in cattle, Transition Council proposes that a regulatory exemption for embryo implantation also require a person to adhere with the following guidelines, processes, terms, conditions, limitations, and/or prohibitions:

- The person must have specific training in embryo implantation in cattle developed with veterinarian oversight that includes practical experience; and
- The person must have the knowledge, skill, and judgement to:
 - Perform the authorized activity safely, effectively, and ethically; and
 - Determine the animal's condition warrants performance of the authorized activity based on the known risks and benefits.

Other Notes

- In preparing this work, Transition Council reviewed an in-depth research and risk-based analysis that showed the level of risk associated with the performance of embryo implantation in cattle allowed for other duly trained non-veterinary animal care providers to provide this important service without an elevated risk of harm or potential harm to an animal(s) or person. However, through this same research and conversation, it also became clear that through this same analysis that this risk evaluation did not, and should not, extend to the performance of this procedure in all types of livestock, especially in relation to equine. Here, these findings were based on the fundamental differences that exist between different

species of livestock including differences in anatomy, the requirements for sedation, and whether the procedure required surgical elements.

- Persons under this regulatory exemption will not be required to provide proof of their eligibility under the regulatory exemption to the College of Veterinary Professionals of Ontario (CVPO). Instead, a person will be expected to review the regulatory exemption and determine whether they meet the requirements.
- Should the CVPO become aware of a person who is offering authorized activities to the public who may not meet requirements, the CVPO will have the ability to investigate these concerns including requiring proof of eligibility and adherence. and will be able to pursue its own investigation under either unauthorized practice and/or the risk of harm clause if warranted.

Quality-Team Based Care

Veterinarian-Client-Patient Relationship (VCPR)

General

Transition Council is proposing the development of regulation language related to the veterinarian-client-patient relationship (VCPR) as permitted by Section 93 (1) 23 of the [Veterinary Professionals Act, 2024 \(VPA\)](#).

This regulation language will apply to both veterinarian and veterinary technician members.

Purpose

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for providing overarching requirements for the practice of veterinary medicine in Ontario.

Overview

The VCPR is the foundation upon which the delivery of clinical veterinary medicine is based.

Establishing a VCPR

Separate Regulatory Section for VCPR

Regulation 1093 under the [Veterinarians Act](#) currently contains one regulatory section that outlines both the veterinarian-client-patient relationship (VCPR) and informed client consent. As both the VCPR and ICC are essential to the safe and accountable practice of clinical veterinary medicine, Transition Council proposes that the VCPR be allocated its own specific section within regulation to allow for clarity surrounding its specific requirements.

Both Types of Members Permitted to Establish a VCPR

In recognition of the VCPR's association with the veterinary team at an accredited facility, Transition Council proposes the development of regulation language that permits both types of members to establish a VCPR. VCPRs would be required to be formed through an accredited veterinary facility and in accordance with facility policies established by the Veterinary Facility Director.

Connection Between the VCPR and After-Hours Veterinary Care

As the provision of after-hours veterinary care by veterinarian members remains one of the core public expectations related to the delivery of clinical veterinary medicine, Transition Council proposes the development of regulation language that clearly outlines its connection to the VCPR. With this recognition, the Transition Council also proposes that a veterinary technician member only be permitted to establish a VCPR if there is a veterinarian member(s) on the veterinary team associated with the accredited veterinary facility who then assumes responsibility for the delivery of after-hours veterinary care services as well as management of any adverse reactions.

Ongoing VCPR Requirements

Transition Council proposes the development of regulation language that carries forward the current VCPR requirements contained in Regulation 1093 under the *Veterinarians Act* including that a member must be retained by the owner or authorized representative of the animal(s) or group of animals, that the member must advise that they will only provide services in accordance with the standards of practice for the profession, and that an agreement is reached between the member and potential client regarding the scope of services to be provided.

Other Notes

- This regulatory concept has been developed based on the one profession, two professionals model outlined in the *VPA*.
- Additional details related to the VCPR, including how it is maintained and discontinued, will be able to be developed through College Policy.
- The term “veterinarian-client-patient relationship” will also be able to be revisited through College Policy as it is not currently outlined in either the *Veterinarians Act* or the *VPA*.

Quality Team-Based Care

Informed Client Consent

General

Transition Council proposes the development of regulation language related to informed client consent in accordance with Section 93 (1) 23 of the [Veterinary Professionals Act, 2024](#) (VPA).

This regulation language will apply to both veterinarian and veterinary technician members.

Purpose

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for providing overarching requirements for the practice of veterinary medicine in Ontario.

Overview

Informed client consent is an essential conversation between a veterinary professional and a client in which the client confirms the clinical veterinary service(s) to be provided.

Obtaining Informed Client Consent

Separate Regulatory Section for Informed Client Consent

[Regulation 1093](#) under the [Veterinarians Act](#) currently contains one regulatory section that outlines both the VCPR and informed client consent. As both the VCPR and informed client consent are essential to the safe and accountable practice of clinical veterinary medicine, Transition Council proposes that informed client consent be allocated its own specific section within regulation to allow for clarity surrounding its specific requirements.

Both Types of Members Permitted to Obtain Informed Client Consent

In recognition of the one profession, two professionals model that licences both veterinarians and veterinary technicians, Transition Council proposes the development of regulation language that allows both types of members to obtain informed client consent for an activity that they are permitted and competent to perform including the ability to share all necessary information related to the services to be provided.

Ongoing Informed Client Consent Requirement

Transition Council proposes the development of regulation language that continues the current requirement in Regulation 1093 for a member to obtain informed client consent prior to the delivery of a specific service or set of services.

Other Notes

- The approach outlined by Transition Council reflects current allowances related to the obtainment of informed client consent by veterinarians or those working under their delegation and supervision while providing more context and clarity around professional expectations.

Quality Team-Based Care

After-Hours Veterinary Care

General

Transition Council proposes the development of regulation language related to after-hours veterinary care in accordance with Section 93 (1) 23 of the *Veterinary Professionals Act, 2024* (VPA).

Purpose

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for providing overarching requirements for the practice of veterinary medicine in Ontario.

Overview

The public expects that they will be able to access timely and needed after-hours veterinary care services from veterinary professionals with whom they have formed a veterinarian-client-patient relationship (VCPR).

Provision of After-Hours Veterinary Care

Ongoing After-Hours Care Requirements

Section 20 of Regulation 1093 made under the *Veterinarians Act* currently outlines the requirements for a veterinarian to provide after-hours veterinary care including that a veterinarian is responsible for providing reasonably prompt services outside of regular practice hours if the services are medically necessary for animals that they have treated recently or treat regularly. Transition Council proposes the development of regulation language that continues these requirements.

Enhanced Wording Related to After-Hours Veterinary Care Arrangements

Transition Council proposes the development of regulation language that continues to permit a veterinarian member to rely on the referral of after-hours veterinary care services to another veterinarian member and/or accredited veterinary facility (not just emergency facilities). Transition Council proposes that this wording be enhanced to provide clarity that this is only permissible when the referring veterinarian member has made a specific agreed-upon arrangement with the veterinarian member and/or accredited veterinary facility that they are referring to.

Clarity Around Discharge Responsibilities

Transition Council proposes the development of regulation language that makes it clearer that a referring veterinarian member's responsibility related to providing care upon discharge applies to all after-hours veterinary care arrangements regardless of the veterinarian member and/or the type of accredited veterinary facility referred to.

Other Notes

- Transition Council proposes that the provision of after-hours veterinary care remain a veterinarian member responsibility. This does not preclude veterinary technician members from also assisting in the delivery of this care through accredited veterinary facilities including through initiation and/or under a veterinarian member's order.

Quality-Team Based Care

Drugs

General

Transition Council is proposing the development of regulation language related to drugs as permitted by Section 91 (1) 27 and 28 of the [Veterinary Professionals Act, 2024](#) (VPA).

Purpose

The ability for veterinary professionals to prescribe, dispense, administer and/or sell drugs is informed and regulated by a broad legislative framework both federally and provincially. The inclusion of both veterinarians and veterinary technicians as licensed members under the same provincial statutory framework necessitates the development of regulation language that reflects the different allowances and permissions for each type of member while also ensuring ongoing public access to care options.

Overview

Updated Language Related to Prescription Portability

Regulation 1093 under the *Veterinarians Act* currently contains a provision related to prescription portability. However, this provision requires a client to ask a veterinarian directly for a written prescription. The College is proposing changes to this approach that removes this onus from the client to ask for the prescription and instead places it on the veterinarian member to inform their clients of this option in recognition of public interest in ensuring awareness of the ability to access the dispensing of drugs for animals by licensed pharmacists.

Specifically, Transition Council is proposing an update to current language contained in [Regulation 1093](#) made under the [Veterinarians Act](#):

Current Language: If a member determines that a drug should be prescribed to treat an animal but the client requests that, instead of the member dispensing the drug, the member give a prescription for the drug, the member shall give the client the prescription and shall do so in writing unless subsection (2) applies.¹

Proposed Language: If a veterinarian member determines that a drug should be prescribed to treat an animal, the veterinarian member shall inform the client of their right to receive a prescription for the drug rather than have the veterinarian member dispense the drug, and if the client wishes to have a prescription the veterinarian member shall give the client the prescription and shall do so in writing unless subsection (2) applies.

¹ Subsection (2) speaks to when a veterinarian is permitted to give an oral prescription to either another veterinarian or a pharmacist.

It is important to note that this draft language is not designed or intended to be viewed as the language that may eventually appear in a regulation made under the *VPA*. Development of this language is the responsibility of the legislative drafters of the Provincial Government and will be overseen by the Ontario Ministry of Agriculture, Food and Agribusiness.

Language Reflecting the One Profession, Two Professionals Model

Transition Council is proposing the development of regulation language that reflects the introduction of two types of members (veterinarians and veterinary technicians) under one regulatory framework and outlines what rules related to the prescribing, dispensing, compounding, administering, and/or selling of drugs apply to what types of members, as current regulatory language only speaks to veterinarians. In particular, Transition Council is proposing the development of regulation language that reflects that only veterinarian members are permitted to prescribe drugs.

Maintain Consistent Approaches

Transition Council is proposing the development of regulation language that reflects that the majority of clauses currently contained in sections 22-23 of Regulation 1093 related to drugs remain transferable to the new regulatory framework to be established under the *VPA*. In particular, Transition Council is proposing the development of regulatory language that signals that veterinary teams (veterinarians, veterinary technicians, and auxiliaries) will still be able to utilize the different skillsets within their accredited veterinary facilities. This will allow for the delivery of safe and accountable care related to prescribing, dispensing, compounding, administering, and/or selling of drugs.

Quality Team-Based Care

Quality Assurance

General

Transition Council is proposing the development of regulation language related to the mandatory quality assurance program in accordance with Sections 32-34 and 93 (1) 34 of the [Veterinary Professionals Act, 2024 \(VPA\)](#).

This regulatory language will apply to both veterinarian and veterinary technician members.

Purpose

The College of Veterinary Professionals of Ontario (CVPO) will be responsible for overseeing a mandatory quality assurance program designed to ensure the ongoing quality and safety of veterinary professionals in practice and to support them in maintaining competency throughout their careers.

Overview

The College of Veterinarians of Ontario has a voluntary quality assurance program that has long been embraced and embodied by veterinarians in Ontario and has included aspects such as continuing professional development hours, peer review of medical records, and peer advisory conversations.

The *VPA* builds on this longstanding work and establishes the framework for the creation of a mandatory quality assurance program for both veterinarians and veterinary technicians under the CVPO.

Most of the structure for the CVPO's mandatory quality assurance program is already outlined in the *VPA*.

There are a few additional areas that require further development and clarity in regulation to ensure a transparent and consistent program.

Definitions

Transition Council is proposing the development of regulation language that contains several definitions designed to assist with clarity. This includes definitions of assessor, program, and stratified random sampling.

Assessors

Transition Council is proposing the development of regulation language that outlines that the Quality Assurance Committee may appoint assessors for the purposes of the program with knowledge and experience in the practice of the profession, quality assurance activities, investigation or assessment techniques, and/or the public interest.

Continuing Professional Development

Transition Council is proposing the development of regulation language that requires every member to participate in continuing professional development activities, and maintain a portfolio of such activities, in the form and manner specified by the Quality Assurance Committee.

Self-Assessments

Transition Council is proposing the development of regulation language that outlines that every member shall participate in self-assessment activities, and keep records of such activities, in the form and manner specified by the Quality Assurance Committee.

Peer and Practice Assessments

Transition Council is proposing the development of regulation language that requires a member to undergo a peer or practice assessment, or both, if

- The member's name is selected at random, including by stratified random sampling;
- The member has been referred by the Quality Assurance Committee; or
- If the member is selected based on criteria specified and published by the Committee at least three (3) months before the member is selected.

These assessments will be performed by an Assessor(s) appointed by the Quality Assurance Committee.

The specific details of the programs will be developed by the Quality Assurance Committee formed under the CVPO and will be publicly consulted on during the development phase.

Other Notes

- Members would not be required to complete all aspects of the mandatory quality assurance program every year. Frequency of requirements would be determined by the Quality Assurance Committee and would be clearly outlined in CVPO Policy.

Administrative

Alternative Dispute Resolution

General

Transition Council is proposing the development of a regulation section related to alternative dispute resolution to align with Section 45 of the [Veterinary Professionals Act, 2024](#) (VPA).

This regulation language will apply to both veterinarian and veterinary technician members.

Purpose

The College of Veterinary Professionals of Ontario (CVPO) will administer a formal alternative dispute resolution process as part of its investigations and resolutions process.

Overview

Alternative dispute resolution in defined cases allows for mediated solutions to specific types of disputes, which has been shown to contribute to greater satisfaction for all parties involved through outcomes such as faster resolutions, tailored resolutions, and increased compliance. Alternative dispute resolution also fosters a climate of co-operation and openness even if a voluntary resolution is not reached.

The College of Veterinarians of Ontario currently has an alternative dispute resolution process at the policy level under the [Veterinarians Act](#). The VPA elevates this program to the level of statutory authority and permits the College to develop a more robust and collaborative program.

Language Related to Administration of the Program

The VPA provides the basic structure for a formal alternative dispute resolution process. Transition Council is proposing the development of regulation language that provides additional structures required to administer the program including provisions related to process, confidentiality, and access to records and information.

List of Ineligible Complaints

Transition Council is proposing the development of regulation language that outlines the types of complaints that would be ineligible to participate in alternative dispute resolution to ensure that concerns related to a higher risk of harm or potential harm to the public and/or animals continue to be addressed through more traditional methods.

Encouraging Use of Alternative Dispute Resolution

In recognition of the benefits and positive outcomes associated with alternative dispute resolution, Transition Council is proposing that alternative dispute resolution be used in all applicable cases unless any participant does not consent (an opt-out instead of opt-in approach).

Other Notes

The types of higher risk complaints that would be ineligible for alternative dispute resolution include those involving:

- The misuse of controlled substances;
- Fraud or misrepresentation;
- Falsification of records or documents;
- Any form of abuse of an animal or person;
- Serious harm to or death of an animal or person;
- Sexual impropriety;
- Criminal charges or convictions; and
- Concerns or risks related to public safety.

Administrative

Prescribed Offences

General

Transition Council is proposing the development of regulation language related to prescribed offences in accordance with Section 38 (1) and 41 (1) of the [*Veterinary Professionals Act, 2024*](#) (VPA).

This regulation language will apply to both veterinarian and veterinary technician members.

Purpose

Professional regulators require detailed information about their members in order to make sound and informed decisions about their ability to safely provide professional services to the public.

Overview

The College of Veterinarians of Ontario can currently gather information related to offences and charges under the [*Veterinarians Act*](#). The VPA streamlines these approaches and increases clarity and transparency around members' requirements to submit information to the College of Veterinary Professionals of Ontario (CVPO).

Prescribed Offences

The VPA requires a member to file a report with the CVPO if they have been charged with and/or found guilty of a prescribed offence. Transition Council is proposing that the following types of offences be outlined as reportable:

1. *Offences relevant to the practice of veterinary medicine*

Transition Council is proposing offences related to areas such as animal abuse and welfare, horse racing, wildlife conservation, and drug management be included as reportable.

2. *Offences relevant to professionalism*

Transition Council is proposing offences related to professionalism also be included as reportable. This includes all criminal offences under the *Criminal Code* as well as more serious aspects of the *Highway Traffic Act* including unsafe or careless driving.

In proposing these offences, Transition Council has applied the lens of public protection with a particular focus on ensuring that all individuals who are offering veterinary services possess the character and integrity that the public expects of professionals.

Other Notes

The specific offences proposed are:

- An offence under the *Criminal Code*. *
- An offence under the *Controlled Drugs and Substances Act*. *
- An offence under section 49 of the *Provincial Animal Welfare Services Act, 2019*. *
- An offence under the *Animals for Research Act*. *
- An offence under the *Horse Racing Licence Act, 2015*. *
- An offence under the *Fish and Wildlife Conservation Act, 1997*. *
- An offence under the *Pounds Act*. *
- The following offences under the *Highway Traffic Act***:
 - Section 84 - penalty for driving unsafe vehicle;
 - Section 130 – careless driving; or
 - Any other offence for which an individual is ordered to pay a fine of not less than \$1,000 and/or to serve an imprisonment term of any length.

Offences under the *Highway Traffic Act* are included due to a member's ability to practise through an accredited mobile veterinary facility.

* Currently collected under the College's By-Laws.

** Proposed new addition.

Administrative

Committee and Panel Composition

General

Transition Council is proposing the development of a regulation section related to membership and quorum requirements for the statutory committees and associated panels established under Section 7 of the [Veterinary Professionals Act, 2024](#) (VPA).

Purpose

The College of Veterinary Professionals of Ontario (CVPO) will conduct a majority of its work through its statutory committees and associated panels. Providing clear outlines of the composition of these essential entities signals to both the public and the profession the structure and general expectations related to the different committees and panels, and their varied composition, and will support them in the completion of their work.

Overview

The [Veterinarians Act](#) currently contains both minimum and maximum membership numbers related to committees and panels. The inclusion of maximums has proven to hinder committees' ability to efficiently address member-matters, especially related to the review of complaints. A change in approach is required to assist in the effective, efficient and adaptable management of workloads.

Membership and Quorum Requirements

Transition Council is proposing that the minimum membership and quorum requirements for statutory committees and their associated panels be outlined in regulation. These minimums have been designed to ensure equitable representation amongst veterinarian, veterinary technician, and public voices.

Transition Council is not seeking the inclusion of maximum membership numbers for committees and panels within Regulation. Instead, the College is proposing that maximums, if required, could be outlined in CVPO By-Laws.

Diverse Voices

Transition Council is proposing that committee and panel membership be chosen from a variety of different backgrounds, including CVPO Council members, government-appointed public members, general members of the CVPO, and general members of the public. The Council of the CVPO would remain responsible for selecting committee membership. The selection process, including any associated competencies or backgrounds, would be outlined in CVPO By-Law.

Other Notes

- Transition Council recognizes the importance of both veterinarians and veterinary technicians serving on committees and panels and is proposing several ways to ensure that equitable voices are heard, including ensuring that all panels that deal with member matters are required to have at least one member of the same professional category as the member under review.
- Transition Council is also seeking the ability for the Council of the CVPO to appoint at-large public members to its different committees and panels to increase both the number of public voices at the table as well as the different backgrounds and insights that they bring.