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Briefing note

REGULATORY CONSIDERATIONS TO ALLOW EXISTING RVT
BUSINESSES TO OPERATE UNDER COLLEGE OVERSIGHT

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Regulatory Considerations to Allow Existing RVT Businesses to Operate under College Oversight

1. Overview

Registered Veterinary Technicians (“RVTs”) are veterinary professionals who both support and extend the services offered by veterinarians. While the majority of RVTs are employed by veterinarians, a growing number of RVTs currently operate independent businesses and provide both conventional and non-conventional therapies¹. For this document, the terms “mobile” and “rehabilitation therapy” reflect a subset of facility accreditation standards outlined by the College of Veterinarians of Ontario.² Independent RVT businesses operate in collaboration with veterinarians, following veterinarian-prescribed treatment plans and administering prescribed medications among other duties, all of which fall within an RVT’s sphere of competence. These businesses meet public demand for animal care that is otherwise challenging to access, reducing pressure on the already strained veterinary sector.

Under the previous regulatory framework, these RVT businesses have been permitted to operate independently of accredited veterinary facilities, as their services were deemed in the public domain.³ However, the new *Veterinary Professionals Act, 2024* (the “Act”)⁴ defines many of these services as authorized activities within the practice of veterinary medicine and requires such services to be provided within

¹ CVO Position Statement *Use of Non-Conventional Therapies in the Practice of Veterinary Medicine* online: <https://www.cvo.org/getmedia/2d57ae27-e081-4bee-acee-bb7027a4fe94/Use-of-Non-Conventional-Therapies-in-the-Practice-of-Veterinary-Medicine.pdf>

² CVO Accreditation Standards for Veterinary Facilities in Ontario online: <https://www.cvo.org/getmedia/51596a6e-548a-4fb7-8903-3bc23b02e615/Accreditation-Standards-for-Veterinary-Facilities-in-Ontario.pdf>

³ *Veterinarians Act*, R.S.O. 1990, c. V.3, ss. 1, 15, 17.

⁴ *Veterinary Professionals Act, 2024*, S.O. 2024, c. 15, Sched. 1.



ONTARIO
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TECHNICIANS

accredited facilities held by veterinarians, effectively preventing RVTs from operating independent businesses. At the same time, the *Act* sets out exceptions that allow not only other regulated professionals such as chiropractors and pharmacists, but also members of the public, to provide such services.⁵ While the *Act* aims to increase access to animal care and oversight for all veterinary professionals, it may have the unintended consequence of both preventing RVTs from providing care and shuttering independent RVT businesses. Regulations are needed to enable independent RVT businesses to continue to operate with appropriate oversight so that the public retains access to these much needed animal care services.

The Transition Council (the “Council”) is tasked with developing regulations under the *Act*, including those which permit or prohibit RVTs from carrying out specified authorized activities under certain circumstances.⁶ The Ontario Association of Veterinary Technicians (the “OAVT”) urges the Council to develop regulations to allow RVT businesses to operate with appropriate oversight by the College, and as necessary, in coordination with veterinarians. In the absence of such regulations, existing RVT businesses may close, and these activities may enter the public domain, undermining the purpose of the *Act* of providing increased access to regulated care. Alternatively, animal owners would need to seek these services from veterinarians who are already overburdened, adding additional pressure to an overwhelmed system and further delaying access to professional care.

To be clear, the purpose of these requested regulations would not be to remove independent RVT businesses from regulatory oversight. The OAVT has long supported the modernized legislation and advocated for moving to an authorized activity and team-based model of care that recognizes RVTs as regulated professionals. In practice,

⁵ *Veterinary Professionals Act, 2024*, [S.O. 2024, c. 15, Sched. 1](#), ss. 9 (3) and (5), Schedule 1, s. 2.

⁶ *Veterinary Professionals Act, 2024*, [S.O. 2024, c. 15, Sched. 1](#), ss. 93(7), 100(4).

existing independent RVT businesses accept referrals from veterinarians, implement treatment plans created by veterinarians, and communicate with veterinarians about shared clients. The OAVT welcomes the opportunity to formalize these and other oversight mechanisms for RVT businesses in the interest of public protection, animal welfare and efficient care delivered by regulated professionals.

Below, we review existing independent RVT business models. We then outline the unintended detrimental effect the *Act* has on these businesses. In response, we propose developing regulations that exempt independent RVT businesses from facility accreditation on certain conditions and provide for oversight of such businesses. In support of this proposal, we point to examples of other allied health professionals operating independently, and existing facility accreditation exemptions offered by the current veterinary regulator.

2. Existing Independent RVT Businesses

Independent RVT businesses are located all over Ontario, including in and around North Bay, Barrie, London, Bancroft, and Kitchener, among other locations, and offer critical services in rural and remote areas where there is limited or no access to a veterinarian. These businesses offer mobile and rehabilitation therapy services that complement or extend services offered by accredited veterinary facilities and contribute to broadening the spectrum of care options supported and encouraged by the Council.⁷ They operate in consultation and collaboration with veterinarians, who provide them with referrals and communicate with them regarding shared clients.

⁷ CVO Position Statement *Balancing Available Health Care Options and Client Access to Veterinary Care* online: <https://www.cvo.org/standards/balancing-available-health-care-options-and-client-access-to-veterinary-care>



Independent RVT businesses are viewed by both veterinarians and members of the public as meeting an otherwise unmet need in the community. These businesses are working well to provide this much-needed animal care. Since 2020, the OAVT has received only 18 complaints about RVTs. Only one of these complaints was concerning an RVT operating independently, and that complaint was not in relation to any of the authorized activities of the practice of veterinary medicine. This low incidence of complaints suggests the self-imposed safeguards presently adopted by RVTs sufficiently meet safety needs and professional standards.

a. Mobile Services

RVTs who offer mobile services are approached by animal owners who have been provided with a treatment plan by a veterinarian and require assistance carrying out the prescribed directions. Alternatively, veterinarians contact and facilitate RVT mobile services on behalf of the client.

There are a variety of reasons that these animal owners and veterinarians seek out independent RVT mobile services. For example, animal owners may not be comfortable administering medications. Or they may want to ensure the safety of the animal and themselves and may be unable to do so without qualified help. Scheduling challenges, mobility issues (for the owner or animal), or financial constraints may also prevent the owner from seeking services at an accredited veterinary facility. Additionally, some tests, such as non-invasive blood pressure, are more accurate when obtained at home in a low-stress environment leading to more consistent and reliable results and improving the long-term monitoring and management of chronic health conditions.



Mobile services involve the performance of RVT essential competencies⁸ and are relatively low-risk. They include the following examples:

- Medication administration;
- Monitoring of health parameters;
- Blood and sample collection;
- Subcutaneous fluid administration; and
- Physical examination.

b. Rehabilitation Therapy

RVTs also offer rehabilitation and integrative therapies⁹ including, but not limited to the following:

- Laser;
- Electrical nerve stimulation; and
- Therapeutic ultrasound.

Both mobile and rehabilitation therapy services include activities that will remain in the public domain, such as grooming, post-operative mobility and range of motion exercises, hydrotherapy, massage, taping, thermotherapy, cryotherapy, and physical exercises.

⁸ OAVT *Objects, By-Laws, Code of Ethics of the Ontario Association of Veterinary Technicians*, online: <https://staging.oavt.org/wp-content/uploads/2023/03/2023-02-26-By-Laws.pdf>

⁹ CVO Position Statement *Use of Non-Conventional Therapies in the Practice of Veterinary Medicine* online: <https://www.cvo.org/getmedia/2d57ae27-e081-4bee-acee-bb7027a4fe94/Use-of-Non-Conventional-Therapies-in-the-Practice-of-Veterinary-Medicine.pdf>



3. The *Veterinary Professionals Act, 2024* and its Effect on Access to Care via Existing RVT Businesses

a. Purpose of *the Act* is to Increase Access to and Oversight of Animal Care

The new legislative scheme seeks to increase access to and oversight of animal care by better defining the scope of practice for veterinary professionals, including both veterinarians and veterinary technicians. This is reflected in the preamble to the enabling legislation, which "recognizes the importance of access to professional care for animals in Ontario" and seeks to create "conditions to increase access to care for animals," while "improving oversight of the veterinary profession in the public interest."¹⁰ It is also reflected in the objects of the new regulator, the College of Veterinary Professionals of Ontario (the "College"). The College is not only mandated to regulate members in the public interest; it is also tasked with working with government and animal care providers towards "better access to animal health care in Ontario."¹¹

b. Effect of *Act* on Existing RVT Businesses May Defeat Its Purpose

Within the previous regulatory framework under the *Veterinarians Act*,¹² RVTs were permitted to operate independent businesses because those services were either not considered to be the "practice of veterinary medicine" or were permitted by exception. The "practice of veterinary medicine" was defined in the *Veterinarians Act* as including the "practice of dentistry, obstetrics including ova and embryo transfer, and surgery, in relation to an animal other than a human being."¹³ The independent services offered by RVTs were deemed to be in the public domain. As such, while the practice of

¹⁰ Bill 171, *Enhancing Professional Care for Animals Act, 2024*, [S.O. 2024, c. 15](#)

¹¹ *Veterinary Professionals Act, 2024*, [S.O. 2024, c. 15, Sched. 1](#), s. 3.

¹² *Veterinarians Act*, [R.S.O. 1990, c. V.3](#).

¹³ *Veterinarians Act*, [R.S.O. 1990, c. V.3](#), s. 1.



veterinary medicine could only be provided at an accredited veterinary facility held by a veterinarian,¹⁴ RVTs were able to operate businesses independently.

As part of its efforts to modernize the regulation of the veterinary profession, the *Act* has expanded the definition of veterinary medicine to include a list of authorized activities.¹⁵ These activities include acts within an RVT's sphere of competence that many RVTs have been carrying out independently.¹⁶

The *Act* continues to require that the practice of veterinary medicine be provided at a veterinary facility.¹⁷ It also maintains the requirement that only veterinarians may apply for a veterinary facility to be accredited.¹⁸ This means that without an exemption from accreditation in the regulations or other alternative mechanisms, RVTs will no longer be able to operate their existing independent mobile and rehabilitative therapy businesses.

While excluding RVTs from performing authorized activities outside of an accredited veterinary facility, the *Act* sets out exceptions that allow unregulated persons to carry out many of these authorized activities independently, including if the person is employed by the owner or is the custodian of the animal under certain circumstances.¹⁹ For example, under the *Act* an animal owner may solicit an unregulated individual to perform an authorized activity, however, this is not the case with an RVT. Should an RVT perform that same authorized activity at the request of the animal owner, they are at risk of losing their license to practice for acting in contravention of the *Act*. This could

¹⁴ *Veterinarians Act*, [R.S.O. 1990, c. V.3](#), ss. 1, 15, 17.

¹⁵ *Veterinary Professionals Act, 2024*, [S.O. 2024, c. 15, Sched. 1](#), Schedule 1.

¹⁶ *Veterinary Professionals Act, 2024*, [S.O. 2024, c. 15, Sched. 1](#), Schedule 1, ss. 1 (1), (2), (6), (10), (11), (12), (13)(i), (vi), and (vii).

¹⁷ *Veterinary Professionals Act, 2024*, [S.O. 2024, c. 15, Sched. 1](#), ss. 1, 9, 21.

¹⁸ *Veterinary Professionals Act, 2024*, [S.O. 2024, c. 15, Sched. 1](#), s. 22.

¹⁹ *Veterinary Professionals Act, 2024*, [S.O. 2024, c. 15, Sched. 1](#), ss. 9 (3) and (5), Schedule 1, s. 2.



mean that a farmer who employs an RVT would not be able to utilize them to the full extent of their scope and instead have to seek necessary medical care from someone without formal education or training, putting the health of the animals and people at greater risk.

Without developing regulations to allow independent RVT businesses to continue, the new legislative scheme could have the unintended consequence of undermining its own goals by forcing independent RVT businesses to close, while allowing authorized activities to be offered by unregulated persons.

4. Need: Regulations Exempting RVT Businesses from Accreditation, While Providing for Oversight

To prevent the disruption of access to animal care, the Council should develop regulations that enable RVTs to initiate a subset of activities which the *Act* grants them the authority to perform under specified conditions. The OAVT appreciates the need to ensure that independent RVT businesses are under the purview of the College and is confident conditions can be crafted to ensure oversight of the veterinary profession in the public interest is met. Options to achieve this mandate may include providing for an exemption from facility accreditation, administering inspections through Quality Assurance, including record-keeping requirements, and coordinated care between RVTs and veterinarians. For example, by referral, or following a treatment plan provided to an owner by a veterinarian. Prioritizing public protection while permitting RVT independent business models is achievable.

5. Precedents for Independent Practice

There is precedent for allied health professionals operating independently within their scope of practice in Ontario. Examples include but are not limited to:



- Nurses who require an order or delegation from physicians for many controlled acts²⁰, are permitted to operate independent nursing businesses;²¹
- Dental hygienists may only perform certain authorized acts if ordered by a dentist.²², are authorized to practice dental hygiene independently;²³
- Social workers and psychotherapists are not permitted to provide a diagnosis of a mental health condition or disorder,²⁴ but may provide psychotherapy services independently,²⁵ provided they meet certain educational and experience requirements.²⁶
- Dental technologists require a prescription issued by a dentist²⁷ to design, construct, repair or alter a dental prosthetic, restorative, and orthodontic device,²⁸ are entitled to independently supervise dental technology laboratories.²⁹

Under the current regulatory framework, the College of Veterinarians of Ontario has developed a mechanism to allow for temporary exemptions from accreditation for a

²⁰ College of Nurses of Ontario (CNO), *Practice Standard: Scope of Practice*, online: <https://www.cno.org/globalassets/docs/prac/49041-scope-of-practice.pdf>

²¹ CNO, *Practice Guideline: Independent Practice*, online: https://www.cno.org/globalassets/docs/prac/41011_fsindepprac.pdf.

²² See e.g. s. 5(2) *Dental Hygiene Act, 1991*, S.O. 1991, c.22, online: [Dental Hygiene Act, 1991, S.O. 1991, c. 22 \(ontario.ca\)](https://www.ontario.ca/laws/statutes/91/dha.html).

²³ CDHO, "CDHO Council Rescinds Standard for Authorization to Self-Initiate," online: <https://cdho.org/cdho-council-rescinds-standard-for-authorization/>

²⁴ *Psychology and Applied Behaviour Analysis Act, 2021*, [SO 2021, c. 27, Sched.4](https://www.ontario.ca/laws/statutes/21/paaba.html), online: ss. 3-4; *Regulated Health Professions Act, 1991*, [S.O. 1991, c.18](https://www.ontario.ca/laws/statutes/91/rhpa.html) ("RHPA"), s. 27(2).

²⁵ See RHPA, s. 33.1, and O. Reg 570/17: <https://www.ontario.ca/laws/regulation/r17570>; *Psychotherapy Act, 2007*, [SO 2007, c. 10, Sched R](https://www.ontario.ca/laws/statutes/07/pa.html), ss. 3 and 8.

²⁶ College of Registered Psychotherapists of Ontario, *Independent Practice*, online: <https://www.crpo.ca/independent-practice/>; O. Reg. 67/15: Registration, online: <https://www.ontario.ca/laws/regulation/150067#BK8>, s. 8; Ontario College of Social Workers and Social Service Workers, *Private Practice*, online: <https://www.ocswssw.org/registrants/private-practice/> (no specific requirements mandated but extensive experience "strongly advised").

²⁷ *Dentistry Act, 1991*, [SO 1990, c 24](https://www.ontario.ca/laws/statutes/91/dent.html), s. 4.

²⁸ *Dental Technology Act, 1991*, [S.O. 1991, c.23](https://www.ontario.ca/laws/statutes/91/dta.html), s. 3.

²⁹ RHPA, s. 32; College of Dental Technologists of Ontario, *Laboratory Supervision Standards*, online: https://cdto.ca/wp-content/uploads/laboratory_supervision_standards-2003-Cover-page-1.pdf.



variety of facilities, including rabies programs and various screening programs.³⁰ This mechanism recognizes that appropriate exceptions to the requirements for accreditation increase access to professional, safe, and qualified care.

Further, in 2023 the College communicated the Council's support and approval of a regulatory sandbox developed by the OAVT and Dr. Lance Males that specifically enables RVTs to practice independently as a mechanism for creating greater access to veterinary care in rural and remote communities. This need is greater now than it has ever been, both in rural communities and now urban centres. We believe the Council must ensure that RVT's ability to address the need for expanded access to care is retained.

Conclusion

Without an exemption from facility accreditation in the regulations or other oversight mechanisms, independent RVT businesses will no longer be able to operate, reducing access to care. At the same time, members of the public will be able to provide many of these services, through the exceptions set out in the *Act*, which may lead to these services being provided by unregulated persons, outside of the oversight of the College. This could have a detrimental effect on animal welfare outcomes and compromise animal and human safety. The Council ought to develop regulations that ensure that independent RVT businesses can continue to operate. The OAVT welcomes the opportunity to work with the Council to ensure regulations set out appropriate oversight mechanisms for independent RVT businesses.

³⁰ CVO, "Temporary Facilities," online: <https://www.cvo.org/veterinary-practice/accreditation/temporary-facilities>