



ONTARIO
ASSOCIATION OF
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April 22, 2024

The Honourable Lisa Thompson, MPP
Minister of Agriculture, Food and Rural Affairs
77 Grenville Street, 11th Floor
Toronto, ON M7A 1B3

Via Email to: minister.omafra@ontario.ca

Dear Minister Thompson,

On behalf of Ontario's registered veterinary technicians (RVTs) and the Ontario Association of Veterinary Technicians (OAVT), I would like to thank you, your team in the Minister's office and the team at the Ontario Ministry of Agriculture Food and Rural Affairs (OMAFRA) for the work done to bring forward the *Enhancing Professional Care for Animals Act, 2024*. For more than a decade, the OAVT has worked collaboratively with the College of Veterinarians of Ontario (CVO), the Ontario Veterinary Medical Association (OVMA), and the team at OMAFRA along with numerous other stakeholders towards this new legislation, and we are thrilled that you have brought it forward for the house to consider.

The OAVT Board of Directors has now had a chance to review Bill 171 in detail and is pleased to share with you our support for the legislation in general, as well as some areas where we believe mutually beneficial changes could be made. We are extremely pleased to see your government recognize the significant growth in the role of RVTs in modern veterinary practice. Ensuring that our members are regulated by the same College as our peers, defining a scope of practice through an authorized activities model and ensuring that RVTs will be represented on the Council of the College where our profession is governed are important steps towards a more inclusive and collaborative professional environment.

Since the *OAVT Act, 1993* was passed, an RVT's role in the modern practice of veterinary medicine has grown substantially. In tabling the new *Veterinary Professionals Act, 2024*, your government has clearly articulated a vision for the future of veterinary medicine in Ontario that will allow RVTs to work to the full scope of their training. This change will be beneficial, not only for RVTs, but also for the health and well-being of our patients, the businesses and mental health of our veterinarian colleagues, the agri-food industry and small animal owners and the public.

To future-proof the proposed legislation, enhance its longevity and ensure that it is agile and flexible enough to adapt in the face of change, we have provided some thoughts and suggestions for your consideration. We believe that a few simple modifications to the proposed legislation would significantly improve its ability to meet our mutual goal of enhancing access to veterinary care in Ontario, and we hope that you will agree.



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Again, we would like to congratulate you on the introduction of this important legislation and offer our thanks for the work done to maximize the value of RVTs within the veterinary profession. If you have any questions regarding our comments on the proposed legislation, please don't hesitate to reach out to our Executive Director, Elise Wickett, RVT, MBA, at elise@oavt.org or by phone at (519) 836-4910 ext. 223.

Sincerely,

Kelsey Streef, RVT
Vice-President
Ontario Association of Veterinary Technicians

CC:

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Bill 171, Enhancing Professional Care for Animals Act, 2024

OAVT Feedback

Schedule 1, Veterinary Professionals Act, 2024

Part III, Authorized Activities, Risk of Harm and Restricted Titles

The Authorized Activities Model proposed in this legislation is a significant, positive step forward for RVTs. By keeping the scope of practice defined in the legislation broad and allowing for any specific changes or limitations to be prescribed in regulations, the flexibility and agility needed to adapt to potential future changes are preserved. This applies both to the specifics defined in section 1 of Schedule 1 and the reference to the ability of Members to delegate.

The OAVT supports the change to the title protection model suggested in Bill 171 related to RVTs. By expanding the title protection regime to include 'Veterinary Technician' without the need for the word 'Registered,' and by transferring these provisions from the *OAVT Act, 1993*, to the proposed *Veterinary Professionals Act, 2024* the government will help ensure there is less confusion among the public with respect to who is licensed to practice in our profession, thereby enhancing public trust.

Additional clarification is needed regarding the 'restricted terms' outlined in Section 13 of the proposed legislation. The OAVT believes it would be appropriate to include terms such as 'animal hospital', 'animal clinic', 'veterinary hospital', 'veterinary clinic' or 'veterinary practice'. However, extending this beyond a limited scope may unnecessarily restrict access to care or services presently being offered and not considered to be authorized activities within the practice of veterinary medicine. The government may wish to consider adding the ability to make these clarifications in regulation as has been done in Section 12 to ensure there is flexibility for this Section to adapt as needed over time.

Part IV, Licensing and Accreditation

The OAVT supports the recommendations made by the OVMA in their letter to Minister Thompson dated March 27, 2024, regarding Sections 14(3), 16(2b & c), 16(4b), 18(3), 20(1a), 20(2a), 20(3a & b), 27(2b), 27(5 & 6 & 7c), 28(2b & d) and 30(4).

However, we believe a change is necessary to Section 22, Application. Specifically, the word 'veterinarian' should be removed so that the text reads, 'A member who wishes to receive or renew a certificate of accreditation shall apply to the Registrar in accordance with the regulations.'

Instead of allowing flexibility and agility by defining the specifics of who can hold a facility license or what type of facility license a particular member can hold in regulation, copying the model proposed for authorized activities, the legislation goes further than necessary, limiting the ability to adapt as needed in future. Specifying that only a veterinarian member may



apply for and hold a veterinary facility accreditation may unintentionally limit the ability of RVTs to participate in expanding access to veterinary care for those who need it.

This would be particularly damaging to the ability of this legislation to improve access to veterinary care in rural and remote regions of the province where there is already a significant shortage of veterinarians. It will also be problematic for current RVT owned businesses, such as those who offer home care services that carry out a treatment plan created by a veterinarian. The care offered by these businesses would now be considered an authorized activity and therefore only available to an RVT who employs a veterinarian or works for one. Not only would this further limit access to care from RVTs it would also significantly impact veterinarians who would now have to offer additional appointment times or increase their hours of operation to meet the newly created need. Instead, the new College and industry stakeholders should work to determine through broad consultations and research what an appropriate framework for facility accreditation that is aligned with the new authorized activities model should be, however, this would not be possible if the legislation does not allow for flexibility.

RVT-owned businesses should be able to provide veterinary medicine within the scope of an RVT member; however, Section 22 precludes their ability to do so unless they hire a veterinarian in a facility director role or otherwise secure the services of a veterinarian to hold the certification of accreditation. The language in the proposed legislation appears to go further than the current CVO policy in restricting the ability to hold a facility accreditation license. Currently, a certificate holder [“is the owner of the veterinary facility or the partners in the practice conducted in or from the facility”](#).

Further, given the possibility of expanded scope for RVTs as their education and training continue to evolve, we believe that amending the proposed legislation as noted above would help ensure that it remains able to meet future needs without additional legislation being necessary while still maintaining the ability of the College to fairly regulate and accredit veterinary facilities.

Part VII, Reporting & Complaints

The OAVT supports the inclusion of requirements for members to report on issues or concerns relating to other members' fitness to practise. However, given that in many cases, an RVT or veterinarian works as the employee of another veterinarian, we believe that additional provisions are required to ensure that they are protected from reprisal by their employer if they encounter a situation in which they are required to report on them. Additional provisions are needed in this section that offer protections and assurances for individuals making a report to the College on fitness to practise that there can be no action taken against them and that all reasonable efforts will be made to maintain the confidentiality of the report.



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We note that there is a similar provision in Part VI, Quality Assurance; however, that appears to apply only to confidentiality between Committees of the Council and does not seem to apply to other individuals or bodies.

Part XVI, Transition

The inclusion of the RVT members, appointed by the OAVT, is extremely welcome, and we will be pleased to ensure that the representatives of our profession are appointed within the two-month timeframe outlined in the proposed legislation. Further, we understand that the transition of RVTs from their registration with the OAVT to a License under the College will require coordination between our two organizations. We have begun discussions with the Registrar of the College on this important topic. We will work to ensure that the process is as smooth as possible for our members without introducing any unnecessary red tape or cost burden.

Schedule 2, Ontario Association of Veterinary Technicians Act, 1993

The OAVT wishes to thank the Ministry for their time and effort in consulting with us on the critical changes to this legislation. We fully support the proposed amendments and see them as an important step forward for our profession and association.