

OAVT Regulatory Concepts Consultation Response



April 16, 2025

**Ontario Association of Veterinary
Technicians
OAVT Board of Directors**



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Letter From the President

Dear Transition Council Members and College Staff,

On behalf of the Ontario Association of Veterinary Technicians (OAVT) and our Board of Directors, I am pleased to share our response to the proposed regulatory concepts that will form the basis for the regulatory framework under the new *Veterinary Professionals Act, 2024* (VPA or legislation). The OAVT greatly appreciates the opportunity to provide feedback on the regulatory concepts proposed by the Transition Council and the College of Veterinarians of Ontario (CVO or the College), and we commend you for the outstanding work you have done to reach this stage.

We have been particularly pleased to see the extent to which your work has been shaped by ongoing discussions with the OAVT and other key stakeholders, as reflected in the regulatory concepts themselves. As we continue to move toward the implementation of a “one profession, two professionals” model in Ontario, your efforts to include, understand, and represent the voices and needs of Registered Veterinary Technicians (RVTs) have been noticeable, setting the tone for how the profession will be governed in the future. We thank you for that effort and believe the results of your work demonstrate its importance.

Overall, the OAVT strongly supports the regulatory concepts and believes they will effectively guide our profession's transition into the new legislative and regulatory framework. We have also identified areas where further refinement is needed, either now by the Transition Council or in the future by the newly formed Council of the College of Veterinary Professionals of Ontario (CVPO), to ensure the legislation meets its dual goals of enhancing access to veterinary care while maintaining robust public protection.

Through this submission, we have outlined our overall position on the concepts and provided specific areas within those concepts for further consideration as the Transitional Council and the College reflect on the feedback gathered from all interested parties. We look forward to continuing to work with you towards the successful transition and modernization of veterinary medicine in Ontario.

Thank you once again for your hard work and thoughtful consideration in drafting these regulatory concepts. Please do not hesitate to reach out if you would like to discuss any aspects of our submission with our leadership team.

Sincerely,

Hailey Farkas, RVT
President, OAVT

Overarching Themes

The OAVT has identified several themes within the regulatory concepts that merit further consideration to ensure their effective alignment with the goals and intended outcomes of the VPA. The feedback aligns with the strategic vision of the veterinary profession's direction and will ensure that future innovation is not hindered or limited by the current presentation of the regulatory concepts, all while maintaining a strong focus on public protection.

OAVT Position on Regulatory Exemptions for Non-Members as it relates to the Authorized Activity Model

One area of overarching concern identified by the OAVT is the disparity created by provisions within the third regulatory concept, *Regulatory Exemptions for Non-Members*. As currently written, this regulatory concept would permit non-members to perform a broader scope of authorized activities than a veterinary technician member. For example, the regulatory exemption for farriers and hoof trimmers permits activities that verge on or could be considered major surgery and would, therefore, be non-delegable by a veterinarian member; however, these activities are permitted to be performed by a non-member of the CVPO.

Consequently, some regulatory concepts as they are currently drafted may discourage RVTs from obtaining or maintaining licensure, as they would be able to offer different or additional forms of care if unlicensed.

The OAVT believes it is important that in meeting the dual goals of the VPA, public protection and expanding access to care, non-licensed animal care providers should not have access to the same or higher-risk aspects of the practice of veterinary medicine, with less oversight than a veterinary technician member.

OAVT Position on Enabling Future Innovation in the Veterinary Profession

The OAVT appreciates the Transition Council and the College's efforts to align with existing veterinary practices in regulation and understands that the Transition Council's mandate focuses on transitioning to the modernized regulatory framework. As we move forward in the regulation development process, the OAVT proposes that greater consideration be given to how the skills, education, and training of veterinary technician members can be leveraged to enable future innovation and progress in veterinary medicine.

For instance, the development of regulatory concepts presented an opportunity to create conditions that would enable veterinary technician members to make greater contributions to support the health and well-being of animals while still maintaining public protection. For example, the regulatory concepts could have allowed for the full scope of activities available to veterinary technician members under initiation to also be available to veterinary technicians operating out of in-home mobile care, rehabilitation, or other settings.

Moreover, achieving the legislation's future-looking objective to enhance access to care may be limited if the regulatory framework continues to restrict veterinary technician members by

mandating and enabling another professional (i.e., veterinarians as facility directors) to impose, at will, limitations on the scope of activities veterinary technician members are permitted to perform. Allowing veterinary technician members to carry out authorized activities, guided by their knowledge, skills, and professional judgment, would not pose a risk so long as these activities are carried out within their sphere of competence.

OAVT Overall Position on Authorized Activity Model – Facility Accreditation

The OAVT looks forward to continuing discussions with the CVPO and the new Council about allowing veterinary technician members to perform authorized activities under initiation within their own facilities, thereby enabling greater access to care while still maintaining appropriate oversight and ensuring public protection.

OAVT Overall Position on Specific Language relates to ‘Clinical Veterinary Medicine’

While the regulatory concepts repeatedly refer to “clinical veterinary medicine,” there does not appear to be a standard definition for the term that clarifies the activities it encompasses. Clinical veterinary medicine needs to be defined in a manner that aligns with the VPA’s goals of ensuring access to care without restricting the ability of members to provide care in all situations where it is required. Examples may include in-home mobile care or rehabilitation settings, wildlife rehabilitation centres, and animal shelters.

Addressing these concerns will help ensure that the regulatory framework supports the advancement of veterinary medicine while meeting the needs of professionals and the public.

Summary of Feedback

To align the regulatory concept with the intended goals of the VPA, the OAVT has proposed several practical solutions that refine key areas of the regulatory concepts. This effort aims to foster equality, encourage future innovation, and support expanded access to care, all while maintaining a high standard of public protection.

Proposed changes to address overarching areas for improvement throughout the regulatory concepts:

- Limit the scope of the authorized activities available for non-members to prevent disparities that could discourage veterinary technicians from obtaining or maintaining licensure.
- Leverage the skills, training and education of veterinary technician members to enable future innovation and progress in veterinary medicine and enhance access to care.
- Create space for open and continued dialogue around facility accreditation, particularly as it relates to enabling veterinary technician members to perform authorized activities under initiation within their own facilities to enhance access to care.
- Establish a clear and inclusive definition of "clinical veterinary medicine".

OAVT Feedback on the Proposed Regulatory Concepts

Licensure

Transfer of RVT Licenses from the OAVT to the CVPO

The OAVT supports the overall approach to licensure proposed in the regulatory concepts and appreciates the efforts of the Transition Council and College to provide a specific path for current RVTs to become licensed with the CVPO.

We recommend that the language regarding the ‘veterinary jurisprudence module’ be consistent for both classes of professionals. Specifically, while it states for veterinarians that “completion of this module will **not** affect the transfer of a veterinarian’s license,” no such assurances are given to RVTs. It is critical that the transfer of RVT members from the OAVT to the CVPO is as smooth and simple as possible. While we understand that an application process is required and that it is important for all members to understand the legislative and regulatory framework under which they will be working, we want to ensure that the "specific pathway" developed for OAVT members does not create barriers to licensure.

We look forward to receiving and discussing additional details regarding the transfer of professionals from OAVT regulation to CVPO regulation, such as the details of:

- The "specific pathway" for OAVT members.
- Clarity on how the CVPO will ensure that RVTs can continue to practice veterinary medicine and maintain public protection while their registration with the OAVT switches to licensure with the CVPO during the transition period.
- How the College will ensure that the OAVT, as the regulator and professional association, will be involved in defining the competency requirements for the licensure of veterinary technicians.

Licensure – Professional Misconduct

When finalizing and enacting the new professional misconduct regulations under the VPA, it will be critical for the CVPO to ensure that ongoing education and support are available for veterinary teams to understand how the new framework impacts them and their work. This will be particularly important regarding Section 13 and Sections 42-47 of the professional misconduct regulatory concept.

Section 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.

Sections 42-47:

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.*

The mandatory reporting requirements outlined in Section 13 must be closely linked to whistleblower protections and protections against retribution, as specified in the VPA, ensuring that existing employee/employer power dynamics do not negatively impact the reporting of, or result in instances of, professional misconduct.

Additionally, clarity is needed on where reporting requirements begin and end. For example, it should be clear whether the requirement to report professional misconduct applies only to incidents that occur within the confines of a workplace or if it extends to a member's personal life outside of work.

The OAVT also suggests that additional clarity is needed for Section 11.

Section 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.

Enhancing this language by adding "referral for" after "availability of" would help protect the public in cases of unexpected death by ensuring that animal owners fully understand that a necropsy may be performed by a different veterinarian than the one they are currently engaging.

While the intent of Section 59 is appropriate, the OAVT has concerns about how it would apply in practice.

Section 59: If another member's license 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.*

The draft regulation suggests that if the owner of a veterinary facility, who is not the Veterinary Facility Director, has their license suspended—for instance, as a result of a

criminal charge—then in the case of a multi-veterinarian practice, the Veterinary Facility Director may not continue working without facing a professional misconduct charge themselves. It is important that the continuity of care for animals at a veterinary practice not be broken as a result of inappropriate actions on the part of one individual or owner.

Summary of Feedback

The OAVT's recommendations on the regulatory concepts for licensure under the VPA are aimed at ensuring that RVTs currently registered to practice in Ontario do not face barriers to becoming licensed with the CVPO. Additionally, they are intended to ensure that the professional misconduct regulations, which we support, are written in a way that makes them as clear and effective as possible while promoting the appropriate continuity of patient care.

Proposed changes to the Licensure regulatory concept:

- Update the regulatory concepts using consistent language regarding the 'veterinary jurisprudence module' for both veterinarians and RVTs.
- Work with the OAVT to create the "specific pathway" for OAVT members transitioning to CVPO licensure and provide clarity on how members can continue practicing veterinary medicine while transitioning from OAVT registration to CVPO licensure.
- Involve the OAVT in defining competency requirements for Veterinary Technician licensure.
- Offer ongoing education and support for veterinary teams to understand the impact of new professional misconduct regulations under the VPA.
- Include mandatory reporting requirements (Section 13) with whistleblower protections to prevent retribution and address employee/employer power dynamics.
- Clarify the scope of reporting requirements under Section 13.
- Modify the language in Section 11 by adding "referral for" after "availability of".
- Provide additional clarity to Section 59 as it relates to how the continuity of care at a veterinary practice will be maintained if an owner's license is suspended.

Authorized Activity Model

Non-Delegable Activities

The OAVT supports the proposal for a CVPO policy on what constitutes a dental extraction. This definition must be crafted in a manner that allows for the development of a standard that is safe for patients and professionals while reflecting the expertise of both veterinarians and veterinary technicians.

Additionally, differentiating between a clinical assessment and a medical assessment is a welcome addition as it is an essential mechanism to ensure that veterinary technicians can effectively contribute to addressing access-to-care challenges. Therefore, we strongly support this distinction.

Delegation

The OAVT understands why the Transition Council has taken the position that there can be no sub-delegation of activities by veterinary technician members. Furthermore, we appreciate that other regulatory tools are available to ensure the absence of sub-delegation does not impede the standard workflow of a veterinary team. Nonetheless, we believe it is crucial that after the transition period, this regulation and its impacts be re-examined. This review is essential for the profession's continued evolution, where enabling veterinary technicians to fully apply their skills, education, and professional judgment enhances access to care, all while maintaining appropriate regulatory oversight in the interest of public safety.

Order

The OAVT strongly supports the inclusion of order as a regulatory tool within the proposed regulatory concepts. We specifically believe that the 'Other Notes' in this section are essential for ensuring the proper functioning of orders within modern veterinary practice and want to confirm their intent is reflected in the final regulatory language.

We are also fully supportive of the proposal to include all delegable activities for use in orders. Anything less than this will reduce access to care and potentially pose a greater risk to the public when care cannot be provided in a timely manner. Similarly, as noted in our Overarching Themes section, we believe it will be important for future Councils to consider how the role of the Veterinary Facility Director, and the personal beliefs or values of the individual in that role, could further limit the ability of veterinary technicians to deliver necessary care that they are competent to provide.

In addition to our support for the use of orders as a regulatory tool, the OAVT is mindful of the administrative burden that could be placed on veterinary teams to ensure that orders are appropriately created, maintained, and implemented. The requirement for each order to be a written document, along with the volume of procedures or activities that could be enabled through an order, may create unintentional barriers due to the substantial workload for Veterinary Facility Directors. Given the already significant administrative burden associated

with the veterinary profession, which can contribute to burnout, we strongly encourage the CVPO to develop standards or templates that could assist veterinary facilities in creating orders that meet all the regulatory requirements.

Initiation

The OAVT strongly supports the inclusion of initiation as a regulatory tool available exclusively to veterinary technician members within the new framework. We support the requirement to obtain informed client consent, the proposed definition, and the proposed list of authorized activities that would be available under initiation.

To facilitate and streamline the provision of care in a veterinary facility, we would like to ensure that order and initiation can be used in coordination with one another. For example, if a veterinary technician member performs a clinical assessment, collects a blood sample, and completes a preliminary hematological laboratory test under initiation, to which the results of that laboratory test are specified within an applicable order, the veterinary technician member can then continue to provide care through the use of additional authorized activities permitted by that order, without additional steps or engagement with a veterinarian.

The OAVT believes that coordinating these regulatory tools to efficiently carry out the performance of authorized activities through order and initiation is crucial. This ensures that the provision of care is not unnecessarily interrupted, which could increase the risk of harm to a patient and reduce the ability of veterinary technician members to contribute to expanded access to veterinary care.

General Comment on Order & Initiation

To maintain the highest level of public protection while ensuring that veterinary technicians can fully contribute to the veterinary team, it is crucial that only licensed members of the CVPO are permitted access to order and initiation as regulatory tools for the purpose of carrying out authorized activities. Any deviation from the proposed regulatory language could seriously diminish the value of licensure for RVTs and consequently create new situations where veterinary technicians are discouraged from obtaining or maintaining a license with the CVPO, as highlighted in our Overarching Themes section.

Forms of Energy

The OAVT has no additional comments to provide on this topic at this time.

Specific Exemptions for Members - Employees of the Crown

The OAVT has no additional comments to provide on this topic at this time.

Specific Exemptions for Members – Under Other Legislation

The Ontario Rabies Response Program (RRP) is managed and coordinated by RVTs working in partnership with the Ministry of Health. The program facilitates the collection of specimens from deceased animals, which are sent to the Canadian Food Inspection Agency for rabies testing at the request of Ontario's Public Health Units and under the legislative and regulatory framework of the *Health Protection and Promotion Act*, Regulation 557. Since 2014, the RRP

has successfully operated across the province under this model and framework, serving as a critical surveillance tool for monitoring the prevalence and spread of rabies in Ontario.

This exemption for members operating under the oversight of other legislation is crucial to ensure that the RRP can continue to protect Ontarians from rabies, and the OAVT strongly supports its inclusion in the regulatory concepts.

Specific Exemptions for Members – Veterinary Technician Members Working under a Veterinarian’s Treatment Plan

The OAVT greatly appreciates the inclusion of this exemption for veterinary technician members and acknowledges the considerable efforts that were dedicated to its inclusion in the regulatory concepts document. We specifically commend the staff at the CVO and the members of the Transition Council for their commitment to engaging in the extensive discussions necessary to grasp the significance of this exemption. The OAVT has been concerned since the introduction of the VPA about the potential unintended consequences of section 22 of the Act, which restricts the ability of RVTs to continue providing the care they currently offer through their own businesses, thereby reducing access to care, which stands in direct opposition to the express goal of the legislation.

To ensure that the regulatory exemption is as effective and minimally intrusive on the current practices of both veterinary facilities and RVT businesses, we believe several important changes should be made:

- The requirement for veterinary technician members to use supplies “provided by the veterinarian member (including drugs)” should be divided into two regulations that distinguish between ‘supplies’ and ‘drugs’.
 - The language for the ‘drugs’ regulation should specify that the veterinary technician member must use drugs “prescribed by” the veterinarian member rather than “provided by” to ensure that veterinary technician members can offer their services if an animal owner has chosen to exercise their right to obtain the drugs from a pharmacy rather than their veterinarian.
 - The language for the ‘supplies’ regulation should be revised to permit veterinary technician members to purchase their own supplies or utilize those provided by an animal owner, as long as, based on their professional judgement, the supplies are appropriate and suitable for carrying out the treatment plan.

In current practice, the decision of which supplies to use while performing veterinary procedures or treatments is often left to the judgment of RVTs. Limiting their ability to make these professional judgments under the new regulatory framework would hinder a veterinary technician member’s capacity to provide enhanced access to care by preventing them from prioritizing the needs of the animal they are treating.

A significant contributing factor for pet owners seeking home care services from an RVT is the desire and need to reduce fear, anxiety, and stress for the animals receiving care. Without the ability to make determinations about the appropriate supplies to use, such as which size needle to use, these businesses will not be able to accommodate the individual needs of a

patient and, in turn, be unable to ensure that the animal, owner, and veterinary technician remain safe during the delivery of care.

Furthermore, RVTs already purchase supplies directly from the same suppliers that serve veterinarians, ensuring there will be no change in the quality or sterility of the supplies used. In cases where an animal owner chooses to use their own supplies, the professional judgment of the veterinary technician member, which is sufficient to determine whether supplies are appropriate in a clinical setting, should also be sufficient to determine if those supplies are appropriate in another setting.

Regarding the proposed change to the regulatory concept concerning veterinary technician members' ability to administer drugs, the change from "provided by" to "prescribed by" is important to ensure that this concept aligns with the College's efforts to strengthen the ability for the public to purchase drugs at locations other than their veterinary clinic. These regulatory changes are necessary to respond to the claims made by the Competition Bureau of Canada, and the OAVT would like to ensure that all areas of the regulatory concepts are aligned in this effort.

Specific Exemptions for Members – Veterinary Technician Members Working Based Upon a Written Referral from a Veterinarian Member

The OAVT greatly appreciates the inclusion of this exemption for veterinary technician members and acknowledges the effort involved in ensuring that the need for this exemption was thoroughly understood so it could be appropriately addressed.

We look forward to the discussions regarding which authorized activities will comprise the proposed list.

Specific Exemptions for Members – Veterinary Technician Member Employed by a Non-Veterinary Animal Care Provider

This exemption, as written, continues to allow non-licensed individuals employed by a business operating under certain statutory exceptions or regulatory exemptions to perform a greater scope of authorized activities than a veterinary technician member employed by the same business.

For instance, this proposed regulatory concept only recommends two limited and specific examples of situations in which a veterinary technician member of the CVPO would be permitted to perform a narrow scope of authorized activities when employed by a non-veterinary animal care provider – such as a farmer/producer. Meanwhile, the VPA under Schedule 1, Section 2.2 permits anyone "employed for general agricultural or domestic work by the owner of the animal" to be exempt from the regulatory framework of the authorized activities entirely. It is, therefore, logical to conclude that if a farmer/producer, a non-veterinary animal care provider, employs two individuals- a veterinary technician member and a general agricultural worker- the general agricultural worker would have a greater ability to provide care for the animals owned by the farmer than that of the veterinary technician member.

This scenario, resulting from the proposed regulatory concept as written, completely contradicts the goals and intent of the legislation to provide enhanced access to care while

maintaining high standards of public protection. An individual who has been educated, trained, and licensed must be able to provide, at a minimum, the same level of care for animals, if not greater, than an unlicensed individual in all situations and circumstances if the value of licensure with the CVPO is to be upheld. Failure to address this will significantly discourage licensure, as animal care providers will realize that it is more advantageous to remain unlicensed and thus not subject to full regulatory oversight.

Specific Exemptions for Members – General Comment on VCPRs, Accountability and the Provision of Care Outside of an Accredited Facility

Based on the requirements outlined in regulatory concept four, *Quality Team-Based Care: Veterinarian-Client-Patient Relationship (VCPR)*, a VCPR is to be formed through an accredited veterinary facility, and the VCPR must be established and maintained by the veterinarian who is creating the treatment plan or making the referral to enable the provision of care under these regulatory exemptions for members. The OAVT believes that additional detail and specificity surrounding accountability are needed for these proposed regulatory exemptions, ensuring greater clarity regarding who is accountable if a negative outcome occurs while care is provided under these exemptions.

For example, if a veterinary technician member is delivering care pursuant to a veterinarian's treatment plan and the patient experiences an adverse reaction or negative outcome, does the accountability rest with the holder of the VCPR, the creator of the treatment plan, the individual providing care, or is it shared among all involved? Furthermore, would the question of joint or shared liability be decided on a case-by-case basis by the CVPO or another qualified adjudicator?

Summary of Feedback

The OAVT's recommendations aim to support the authorized activities model by clarifying and strengthening the order and initiation tools, enhancing the proposed exemptions for members, and ensuring that the regulatory concepts do not inadvertently dissuade licensure.

Proposed changes to the Authorized Activities Model regulatory concepts:

- Create a space for open and continued dialogue on the opportunity for sub-delegation by veterinary technicians after the transition period to ensure the profession can evolve over time.
- Develop standards or templates to aid in the creation, maintenance, and implementation of orders to minimize the administrative burdens on veterinary teams.
- Clarify that order and initiation can be used together in veterinary practice to enable seamless provision of care not available under initiation but accessible through other regulatory mechanisms.

- Split the regulation requiring veterinary technician members to use supplies “provided by the veterinarian member (including drugs)” into separate regulations for ‘supplies’ and ‘drugs.’
- Specify that drugs must be prescribed by the veterinarian rather than “provided by” to allow animal owners to obtain drugs from pharmacies if they choose.
- The ‘supplies’ regulation should be changed to allow veterinary technician members to purchase their own supplies or use those provided by animal owners, as deemed appropriate using their professional judgment.
- Regulations should explicitly allow veterinary technician members to make professional judgments about the supplies they use, such as needle size, to prioritize animal needs and ensure safe, effective care.
- Enhance the proposed exemption to ensure that unlicensed individuals employed by a non-veterinary animal care provider cannot perform a greater scope of authorized activities than a veterinary technician member employed by the same individual.

Regulatory Exemptions for Non-Members

Chiropractors

The OAVT has no additional comments to provide on this topic at this time.

Pharmacy Professionals

The OAVT has no additional comments to provide on this topic at this time.

Animal Rehabilitation

The current College public policy statement “Use of Forms of Energy in the Treatment and/or Care of Animals” classifies the use of any laser above Class 3B as moderate risk. The OAVT believes that, given the acknowledged risks associated with Class IV lasers and above, only regulated professionals, whether regulated by the CVPO or another professional regulatory body, should have access to this authorized activity. Therefore, the proposed regulatory concept should be amended to remove the reference to Class IV lasers for non-members.

This change will enhance the protection of the public and animals by ensuring that only those subject to regulatory oversight will have access to authorized activities that are considered to be “moderate or high risk”¹.

Farriers & Hoof Trimmers

This proposed exemption allows for the performance of high-risk authorized activities that verge on being non-delegable from a veterinarian member. Specifically, performing a procedure below the dermis if it remains within or below the coronary band and within the structure of the hoof, could constitute major surgery in some situations and pose serious risks

¹ College of Veterinarians of Ontario Policy Statement (2021). Use of Forms of Energy in the Treatment and/or Care of Animals.

to an animal. The OAVT believes that to ensure adequate public protection without restricting access to care, the regulatory exemption should be revised to specify that this procedure should only be done by an unlicensed individual who is a farrier or hoof trimmer when doing so with veterinarian oversight.

Moreover, the OAVT wants to clarify that this serves as another example of an exemption that may inadvertently dissuade veterinary technicians from seeking licensure, as this exemption may grant greater freedom and autonomy to perform authorized activities as a farrier or hoof trimmer without having to pursue licensure. Specifically, no veterinary technician member would be permitted to perform a procedure below the dermis if it verges on major surgery, as it would be deemed a non-delegable activity. However, this regulatory concept implies that if the same individual were to relinquish their license, they could perform these procedures as a farrier or hoof trimmer.

It is imperative that the regulatory concepts address this persistent devaluation of veterinary technician licensure to safeguard against inadvertently discouraging qualified individuals from seeking licensure.

Mass Culls of Livestock & Poultry

The OAVT has no additional comments to provide on this topic at this time.

Embryo Implementation in Cattle

The OAVT has no additional comments to provide on this topic at this time.

Summary of Feedback

The OAVT's recommendations for changes to the regulatory concepts within Regulatory Exemptions for Non-Members aim to enhance public protection and ensure that qualified individuals are not dissuaded from obtaining or maintaining licensure with the CVPO due to an increased ability to provide care to animals if they do not hold a license.

Proposed changes to the Regulatory Exemptions for Non-Members Regulatory Concept:

- Revise the proposed regulatory concept to remove the reference to Class IV lasers for non-members.
- Revise the regulatory concept to require veterinarian oversight for high-risk authorized activities performed by farriers and hoof trimmers, such as procedures below the dermis within or below the coronary band and within the structure of the hoof.

Quality Team-Based Care

Veterinarian-Client-Patient Relationship (VCPR)

The OAVT is very supportive of and appreciates the inclusion of veterinary technician members in this section. Enabling veterinary technician members to establish a VCPR is an important step towards ensuring that veterinary facilities maximize their capacity to provide care by minimizing any unnecessary administrative burden on veterinarians.

While we understand that the role of the Transition Council is to facilitate the transition of the profession to a modern legislative and regulatory framework, the OAVT believes it is crucial for future Councils to consider whether veterinary technician members should have the ability to establish a VCPR independently, provided they meet the same requirements as an accredited veterinary facility with respect to the provision of after-hours care.

The OAVT looks forward to continuing discussions with the CVPO about allowing veterinary technician members to hold certificates of facility accreditation, thereby enabling greater access to care while still maintaining appropriate oversight and ensuring public protection

Informed Client Consent

The OAVT is very supportive of and appreciates the inclusion of veterinary technician members in this section. Enabling veterinary technician members to establish informed client consent is an important step in ensuring that public protection is maintained while veterinary technicians operate under applicable regulatory exemptions for members. It is also crucial for enabling veterinary technician members to work efficiently and effectively within veterinary teams and enhance access to care by reducing some of the administrative burden on veterinarians.

After-Hours Veterinary Care

The OAVT has no additional comments to provide on this topic at this time.

Drugs

The Transition Council is taking important steps with this regulatory concept to ensure the portability of drug prescriptions in the veterinary industry. To maximize the effectiveness of this provision, it is essential to ensure that no other regulatory concepts, particularly the exemptions for veterinary technician members to work under a treatment plan, unnecessarily limit or constrain the ability of animal owners to purchase their prescribed drugs at their chosen location.

Quality Assurance

As the Quality Assurance Committee begins to develop the Quality Assurance (QA) program, it is crucial to consider the experiences of both professionals. Veterinary technician members should be involved in creating the QA program for veterinarian members. Likewise,

veterinarian members should be involved in creating the QA program for veterinary technician members.

Similarly, once the QA program is implemented, both categories of professionals should participate in evaluating each other to ensure that diverse professional experiences and educational backgrounds are considered. This will help ensure that the QA program maintains the highest possible standards of public protection and reflects team-based care.

Summary of Feedback

The OAVT's recommendations for changes to the regulatory concepts within Quality Team-Based Care focus on ensuring that drug portability functions as intended and ensuring the QA program is as effective as possible. Additionally, the OAVT would like to express strong support for the ability of veterinary technician members to establish a VCPR and obtain informed client consent.

Proposed changes to the Quality Team-Based Care Regulatory Concept:

- Ensure that no other regulatory concepts, particularly those related to veterinary technician members working under a treatment plan, unnecessarily limit or constrain animal owners' ability to purchase prescribed drugs at the location of their choosing.
- Involve both categories of professionals in the development of the Quality Assurance (QA) program.
- Include both veterinary technician and veterinarian members in the evaluation process of QA programs.

Administrative

Alternative Dispute Resolution

The OAVT has no additional comments to provide on this topic at this time.

Prescribed Offences

The OAVT has no additional comments to provide on this topic at this time.

Committee & Panel Composition

The OAVT strongly supports the inclusion of veterinary technician members not only on each committee, as mandated by regulation, but also in calculating quorums for each committee meeting. This is an important step toward ensuring the “one profession, two professionals” model is implemented to the highest standard.

To uphold this high standard across all committee processes, the OAVT also strongly supports the specificity in the ‘Other Notes’ section of this regulatory concept, which states that the Transition Council will be “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.”

Summary of Feedback

The OAVT is very supportive of the proposed Committee & Panel Composition Regulatory Concept and has no changes to propose to other areas of the Administrative Regulatory Concepts.

Conclusion

The Ontario Association of Veterinary Technicians (OAVT) commends the Transition Council and College of Veterinarians of Ontario (CVO or the College) for their thoughtful and comprehensive approach in developing regulatory concepts that represent a significant step toward the regulation of veterinary medicine under the *Veterinary Professionals Act, 2024* (VPA). The proposed regulatory concepts represent a meaningful advancement in fostering collaboration among veterinary professionals, enhancing public protection, and expanding access to care. Nevertheless, as detailed in this response, there are several areas where refinement is necessary to ensure the framework fully achieves its intended goals.

Our submission emphasizes collaboration, clarity, and equity to advance veterinary medicine in Ontario. We aim to strike a balance between empowering RVTs to contribute to expanding access to care, fostering innovation in the delivery of veterinary care, and maintaining the high degree of public safety and protection that Ontarians expect and deserve. Our recommendations are designed to assist the Transition Council in achieving the goals set out in the legislation, and we look forward to your thoughtful consideration of them.

Among these regulatory concepts, the Authorized Activity Model stands out as the most critical for refinement. Valuing a veterinary technician's autonomy in decision-making is crucial for maximizing their contributions within veterinary teams. In particular, we want to emphasize that several key themes within this regulatory concept should be addressed:

1. **Emphasizing the Distinction Between Veterinary Technician Members and Non-Members:** The potential inequities between veterinary technician members and unlicensed individuals or non-members performing similar tasks necessitate further clarification and distinction within their respective roles to uphold the value of veterinary technician licensure and ensure public safety.
2. **Valuing Veterinary Technician Autonomy in Decision-Making:** The opportunities for veterinary technician members to independently manage certain aspects of care, such as initiating authorized activities or determining the optimal supplies to use must be maximized to reduce unnecessary barriers in the delivery of care and optimize team-based workflows. Adopting strategies that foster innovation and agility, such as sub-delegation and facility accreditation, is essential for adapting to the evolving landscape of veterinary medicine.
3. **Streamlining Administrative Processes:** Administrative efficiency is crucial for implementing regulatory tools. Simplified processes, such as coordinating orders and initiation, allow veterinary technicians to prioritize delivering quality care rather than navigating overly complex regulatory requirements. Additionally, guiding standards or templates will assist in the creation, implementation, and maintenance of orders.

We are also strongly advocating for revisions to the Regulatory Exemptions for Non-Members, ensuring that unlicensed individuals are not permitted to perform authorized activities that exceed those permitted to veterinary technician members. Such exemptions risk devaluing licensure and undermining the profession's integrity. By establishing clear

distinctions in scope and oversight, the regulatory framework can maintain fairness and equity among all providers.

Finally, the Transition Council's work to ensure that the regulatory framework enables veterinary technician members to establish a Veterinarian-Client-Patient Relationship, obtain informed client consent, and actively participate in Quality Assurance programs is pivotal to advancing quality team-based care. These measures, along with balanced representation on committees and panels, will ensure that RVTs continue to play an integral role in shaping the future of veterinary medicine in Ontario.

The OAVT remains committed to collaborating with the Transition Council and the College to refine these concepts and support the successful implementation of the VPA. By addressing the recommendations outlined in this submission, the regulatory framework can empower innovation, expand access to care, and uphold the highest standards of public protection—ensuring a bright future for veterinary professionals and the animals they serve.

Thank you, once again for your time and effort in drafting these regulatory concepts, understanding the critical information that informed them, and for considering our constructive feedback during this consultation process.