



POSITION STATEMENT

Rabies Vaccinations

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| Key Words: | vaccine, vaccinations, clinics, protocol |
| Related Topics: | accreditation, record keeping, assessment |
| Legislative References: | <i>Veterinarians Act R.S.O. 1990</i> O. Reg. 1093, Part VI: Exemptions O. Reg. 1093, sec. 17(1) (professional misconduct) <i>Health Protection and Promotion Act (Ont. Regs. 567)</i> (See Appendix 1) |
| College Contact: | Registrar |
| Reference Materials: | Replaces “Guidelines for Rabies Vaccination Clinics,” “Trap, Vaccinate and Release (TVR) Protocol” (September 20, 1995), and “Food Producing Animal and Equine Practitioners Vaccinating Companion Animals (June 26, 1991). |

College publications contain practice parameters and standards which should be considered by all Ontario veterinarians in the care of their patients and in the practice of the profession. College publications are developed in consultation with the profession and describe current professional expectations. It is important to note that these College publications may be used by the College or other bodies in determining whether appropriate standards of practice and professional responsibilities have been maintained.

Purpose

This document aims to explain and interpret existing legislation regarding the process to be followed when administering rabies vaccines.

Scope

This Position Statement applies to all veterinarians in Ontario who administer rabies vaccines.

Background

For several years the College has published Guidelines for Rabies Vaccination Clinics, administered by the Accreditation Committee, in order to explain the process veterinarians must follow to conduct programs to vaccinate domestic animals in order to reduce human exposure to rabies. Additional College publications that provide guidance on rabies vaccine protocols included the “Trap, Vaccinate, and Release” policy and the “Food-Producing Animal and Equine Practitioners Vaccinating Companion Animals” policy. This Position Statement consolidates all of these into a single publication for ease of reference, and emphasizes the CVO’s support of public-health officials in their efforts to ensure rabies vaccinations are accessible for all Ontario animals.

Position Statement

General

It is the position of the College that reducing human exposure to rabies continues to be an important consideration in the practice of veterinary medicine. The College upholds Regulation 1093, Part VI: Exemptions, which serves the public interest by facilitating rabies vaccination clinics as a critical and integral part of the province’s overall prevention and control strategy to reduce the risk of human exposure to rabies. Though rabies incidence in Ontario’s wildlife populations has decreased in recent years, the disease remains endemic (bats remain a major reservoir for rabies).

It is a legal requirement as per Ontario Regulation 567 under the *Health Protection and Promotion Act* for all dog and cat owners to immunize their animals against rabies. However, the majority of domestic biting incidents in Ontario involve un- or under-vaccinated animals.¹ Making rabies vaccinations available to those members of the general public who would not otherwise seek the vaccine through a veterinarian’s practice therefore continues to be necessary.

Minimizing the risks associated with potential rabies exposure between humans and domestic animals is a priority for health units under the Ministry of Health and Long Term Care (MOHLTC) in Ontario and the College of Veterinarians of Ontario.

Standards

While the Regulation allows members to hold rabies vaccination clinics in unaccredited facilities, specific required conditions are specified in order to ensure particular standards are met (see Appendix 1). These standards include records requirements, infection control, and emergency preparedness. While a “conventional assessment” is not required before the vaccination is

¹ As of April 2010, between 60-75% of domestic animals involved in bite investigations by public health are not current on their rabies vaccinations.

performed (Reg. 1093, s.45[5]), members are expected to ask basic questions about the general health of the animal in order to determine whether or not the animal should be vaccinated on the day of the clinic. It is the College's position that with these minimum standards in place, the benefit of the vaccination in the interests of public health outweighs potential risk to the animals.

The College makes two other exemptions to statutory requirements in order to help protect the public from exposure to rabies: it allows licensed practitioners with food-animal and equine mobiles (which are not accredited for companion animal practice) to vaccinate farm animals against rabies, and it allows members working with the Ministry of Natural Resources to delegate the rabies vaccination of wildlife without supervising the administration of the vaccine (see respective Protocols, below).

Certificates

Veterinarians must issue a certificate to clients after each rabies vaccination is administered to an animal. The original must be given to the client, and a copy must be kept in the medical record. As per Reg. 567 under the *Health Protection and Promotion Act*, certificates must be as follows:

A certificate of immunization shall be signed by the veterinarian who performed the immunization and shall contain,

- (a) the name and address of the owner or person having care and custody of the animal;
- (b) the species, breed, sex and age of the animal;
- (c) markings, if any, on the animal;
- (d) the address of the clinic or other location where the animal was immunized;
- (e) the name and code of the vaccine;
- (f) the date of the immunization;
- (g) the date that the animal is to be reimmunized; and
- (h) the number of the rabies identification tag that is issued with respect to a cat or dog. R.R.O. 1990, Reg. 567, s. 6.

Protocol for Setting up Companion Animal Rabies Clinics

Members who wish to offer a rabies clinic must submit the Request for Authorization of a Rabies Clinic form (see Appendix 2) to the College at least 2 weeks before the target clinic date. This form requires members to confirm that all members either with practices in the area or who provide services to the area in question have been invited to participate in the program at least 2 weeks before the clinic is to be held, and that the cooperation of the medical officer or officers of health for the area has been requested, as per Ontario Regulation 1093 section 45 (1). The form should be faxed to the local Public Health Unit to obtain the appropriate signature.

Failure to comply with section 45 of Ontario Regulation 1093 will be considered an act of professional misconduct.

Protocol for Food Animal and Equine Veterinarians

Veterinarians with accredited Food Animal and Equine Mobile facilities are permitted to vaccinate resident companion animals against rabies, if these animals do not receive regular veterinary care and would otherwise not be vaccinated. Records must be kept, as per Ontario Regulation section 45(3-4) [see Appendix 1], and certificates must be issued.

Protocol for “Trap, Vaccinate, and Release (TVR)” Wildlife Programs

While Ontario Regulation 567 under the *Health Protection and Promotion Act* states that immunization against rabies shall be “carried out by a veterinarian registered under the *Veterinarians Act*” (section 4a), and Ontario Regulation 1093 under the *Veterinarians Act* requires members “to be on the premises, and to be available for personal intervention” when provision of a service has been delegated to an auxiliary, members involved in municipal or provincial trap, vaccination and release (TVR) rabies vaccination programs are permitted to delegate the vaccination of wildlife to appropriate individuals authorized by the Ministry of Natural Resources, without being in attendance.

From the *Veterinarians Act of Ontario*

REGULATION 1093, PART VI EXEMPTIONS

45. (1) If a member or group of members sponsors a program to vaccinate domestic animals in order to reduce human exposure to rabies, the member may advertise the location, date and time of the program, the names of participating members and the cost of the vaccination if,

- (a) all members practising in the area are invited to participate in the program at least two weeks before the vaccinations are to be carried out;
- (b) the co-operation of the medical officer or officers of health for the area is requested; and
- (c) the Registrar is given written notification of the program at least two weeks before the vaccinations are to be carried out and the notice confirms that there has been compliance with clauses (a) and (b). R.R.O. 1990, Reg. 1093, s. 45 (1).

(2) The vaccinations carried out in a program under subsection (1) need not be performed in an accredited veterinary facility if,

- (a) drugs suitable for use in conventional veterinary emergencies are available on the premises where the program is being conducted;
- (b) vaccines are kept refrigerated;
- (c) the premises where the program is being conducted are kept clean; and
- (d) vaccines are administered by an aseptic technique. R.R.O. 1990, Reg. 1093, s. 45 (2).

(3) The records in section 22 are not required in respect of a vaccination carried out in a program under subsection (1), but a member shall record,

- (a) a reasonable identification of the vaccinated animal;
- (b) the owner's name, address and telephone numbers;
- (c) the date and fact of vaccination; and
- (d) the type of vaccine, including the lot and serial number of the vaccine administered. R.R.O. 1990, Reg. 1093, s. 45 (3).

(4) The information recorded under subsection (3) shall be maintained in a systematic manner by the members organizing the program. R.R.O. 1990, Reg. 1093, s. 45 (4).

(5) A conventional assessment is not required before a vaccination is performed under this Part. R.R.O. 1990, Reg. 1093, s. 45 (5).

(5.1) A vaccination performed under this Part must be performed by a member. O. Reg. 431/00, s. 11.

(6) After the vaccination, the member shall sign and give to the custodian of each vaccinated animal a certificate of vaccination for that animal, which shall legibly set out the name and telephone number of the vaccinating member. R.R.O.1990, Reg.1093, s.45(6).

From the *Health Protection and Promotion Act*

R.R.O. 1990, REGULATION 567

RABIES IMMUNIZATION

1. Every owner or person having the care and custody of a cat or dog three months of age or over that is kept in a health unit listed in Column 1 of Table 1 shall ensure that the cat or dog is immunized against rabies on and after the date set out opposite thereto in Column 2 of Table 1. R.R.O. 1990, Reg. 567, s. 1.

2. (1) Every owner or person having the care or custody of a horse, cow, bull, calf or sheep or any class of horse, cow, bull, calf or sheep that is kept in a health unit or any premises or class of premises within a health unit listed in Column 1 of Table 2 shall ensure that each such animal or class of animal that is listed opposite thereto in Column 2 of Table 2 is immunized against rabies. R.R.O. 1990, Reg. 567, s. 2 (1).

(2) Subsection (1) does not apply to a horse, cow, bull, calf or sheep or class of horse, cow, bull, calf or sheep that is accessible only to the person or persons who are responsible for the care and control of such animal or class of animal, as the case may be. R.R.O. 1990, Reg. 567, s. 2 (2).

3. Every owner or person having the care and custody of an animal that is required to be immunized against rabies under section 1 or subsection 2 (1) shall ensure that the animal is reimmunized against rabies by the date specified in the certificate of immunization issued with respect to the animal. O. Reg. 320/94, s. 1.

4. Immunization against rabies shall be,

- (a) carried out by a veterinarian registered under the *Veterinarians Act*; and
- (b) by inoculation with a rabies vaccine that is licensed for use in Canada and that is administered in accordance with the instructions of the manufacturer who produced the vaccine. R.R.O. 1990, Reg. 567, s. 4.

5. (1) The owner or person having the care and custody of an animal that has been immunized or reimmunized against rabies shall be issued a certificate of immunization by the veterinarian who carried out the immunization. R.R.O. 1990, Reg. 567, s. 5 (1).

(2) In the case of a cat or dog, the veterinarian who carried out the immunization shall also provide the owner or person with a rabies identification tag. R.R.O. 1990, Reg. 567, s. 5 (2).

6. A certificate of immunization shall be signed by the veterinarian who performed the immunization and shall contain,

- (a) the name and address of the owner or person having care and custody of the animal;
- (b) the species, breed, sex and age of the animal;
- (c) markings, if any, on the animal;
- (d) the address of the clinic or other location where the animal was immunized;

- (e) the name and code of the vaccine;
- (f) the date of the immunization;
- (g) the date that the animal is to be reimmunized; and
- (h) the number of the rabies identification tag that is issued with respect to a cat or dog. R.R.O. 1990, Reg. 567, s. 6.

7. A duplicate copy of each certificate of immunization issued under this Regulation shall be retained by the person who issued it for a period of three years from the date of its issue. R.R.O. 1990, Reg. 567, s. 7.

8. (1) The owner or person having the care and custody of an animal that is in or has a physical condition that precludes the safe immunization or reimmunization of the animal against rabies is exempt from the requirement of this Regulation where,

- (a) a statement of exemption is issued by a veterinarian with respect to the animal that sets out the reason why the animal cannot be immunized or reimmunized; and
- (b) the animal is controlled in such a manner as to preclude its being exposed to rabies. R.R.O. 1990, Reg. 567, s. 8 (1).

(2) An owner or person referred to in subsection (1) continues to be exempt from the requirements of this Regulation so long as the animal cannot be immunized or reimmunized. R.R.O. 1990, Reg. 567, s. 8 (2).

Request for Authorization of a Rabies Clinic

APPENDIX 2

CVO MEMBER INFORMATION

Veterinarian's Name: _____ CVO Licence #: _____

Phone: _____

Fax: _____

Name(s) of other participating CVO members:

CLINIC INFORMATION

Location where services will be provided: _____

Date of proposed clinic: _____ Time: _____

Estimated: # of clients to be served: _____ # of animals to be vaccinated: _____

Was this service requested? No Yes

If Yes, by whom? _____ (name/position/agency)

Rabies Program Manager (or equivalent) contacted at the local Public Health Unit:

_____ (please print) Signature: _____

I, _____ (name), currently licensed with the College of Veterinarians of Ontario, hereby confirm that:

- I have requested the cooperation of the medical officer of health for the area, and
- a copy of our correspondence is attached (if his/her signature was not obtained on this form);
- I have invited all members providing services to the area to participate at least 2 weeks prior;
- drugs suitable for use in conventional veterinary emergencies will be available onsite;
- the vaccines will be kept refrigerated and administered by a veterinarian using an aseptic technique;
- the premise used for the clinic—if not a CVO-accredited facility—will be kept clean;
- records will kept, including identification of the vaccinated animal, the owner's name, address and telephone numbers, the date and fact of the vaccination, and the type of vaccine, including the lot and serial number of the vaccine;
- Each animal's custodian will be given a certificate of vaccination, which will be signed by and include the name and telephone number of the vaccinating veterinarian;
- I will meet all practice standards and professional conduct requirements as set out in the *Veterinarians Act*, Regulation 1093, and College publications;
- I will not use the opportunity of the clinic to solicit clients of other veterinarians or steer clients to specific veterinarians;
- All fees received will be paid directly to me or other participating veterinarians.

Signature: _____ Date: _____

This form must be sent to the Registrar, c/o the Accreditation Manager, CVO, at fax #519-824-6497 or 1-888-662-9479 at least 2 weeks before the proposed clinic. The Clinic must not proceed until official Authorization has been received from the CVO.