



AGENDA

Transition Council Meeting

Monday, August 11, 2025

1:00 – 4:00 pm

Virtual Meeting

Members

Dr. Patricia Alderson
Ms. Kirsti Clarida, RVT
Dr. Kathleen Day Dunbar
Mr. John de Bruyn
Ms. Cathy Hecimovich

Dr. Louise Kelly
Ms. Catherine Knipe, Chair
Ms. Lisa Langton, RVT
Dr. Lena Levison
Dr. Clayton MacKay

Dr. Sean Marshall
Mr. Phil Nichols, RVT
Dr. Alana Parisi
Dr. Sami Qureshi
Dr. Jessica Retterath

Mr. Douglas Reynolds
Dr. Yashvir Varma
Dr. Wade Wright, Vice-Chair
Dr. Michael Zigler

Agenda

1. Call to Order (1:00 pm)
2. Roll Call
3. Approval of Agenda
4. Conflict of Interest
5. Approval of Minutes
 - June 13, 2025
6. Transition Council Evaluation
7. Review of Regulatory Concepts
 - 7.1. Terms and Conditions for Chiropractors
 - 7.2. After-Hours Veterinary Care
 - 7.3. Regulatory Exemptions for Members
 - 7.4. Regulatory Exemptions for Non-Members – PAWS
 - 7.5. Facility Accreditation
8. Proposed Approach to Existing Standards and Policies

- 9. Miscellaneous
 - 9.1 Updated Transition Council Workplan
 - 9.2 Format for Regulatory Concept Submission to the Ministry
- 10. By-Laws
 - 10.1. Elections Process
 - 10.2. Public Register
 - 10.3. Professional Liability Insurance
- 11. Confidentiality
- 12. Next Meeting
 - September 25-26



AGENDA ITEM 4.

TOPIC: Conflict of Interest

Overview

A conflict of interest exists where a reasonable person would conclude that a Council member's personal or financial interest may affect their judgment or the discharge of their duties to the College. A conflict of interest may be real or perceived, actual or potential, direct or indirect.

All Council members have a duty to carry out their responsibilities in a manner that serves and protects the interest of the public. As such, they must not engage in any activities or in decision-making concerning any matters where they have a direct or indirect personal or financial interest. All Council members have a duty to uphold and further the intent of the Act to regulate the practice and profession of veterinary medicine in Ontario, and not to represent the views of advocacy or special interest groups.

Where a Council member believes that they may have a conflict of interest in any matter which is the subject of deliberation or action by Council, they shall:

- (i) consult, as needed, with the Chair or the Registrar;
- (ii) where there appears to be a conflict of interest, not take part in the discussion of, or vote on, any question in respect of the matter;
- (iii) where there appears to be a conflict of interest, absent themselves from the portion of any meeting relating to the matter; and
- (iv) where there appears to be a conflict of interest, not attempt in any way to influence the voting or do anything that might be perceived as attempting to influence the decision of other Council members on the matter.

COVER SHEET
Transition Council Meeting
August 11, 2025



AGENDA ITEM 5.

TOPIC: Approval of Minutes

5.1 Minutes

- June 13, 2025

COVER SHEET
Transition Council Meeting
August 11, 2025



AGENDA ITEM 6.

TOPIC: Transition Council Evaluation

After every Council meeting an evaluation is sent to all Councillors to receive feedback on the meeting and to determine how we can continually improve on our performance. The survey aggregate results are provided to the Chair to assist with meeting preparation. The results are attached for Council's reference.

Attachment

June 13, 2025 Evaluation



AGENDA ITEM 7.1

TOPIC: Terms and Conditions for Chiropractors

Overview

Introduction

On May 14, 2025, Transition Council reviewed consultation feedback and additional information related to a proposed regulatory exemption for chiropractors. This information can be found in Item **10.1** of the May 14, 2025, package.

During this review and discussion, Transition Council raised additional questions related to the research and risk analysis behind the proposed exemption. Councilors also spoke to their concern around opportunities to mitigate risks raised by members of the veterinary profession.

A history of previous conversations, research, and related work on this topic has been compiled as a reference for Transition Council. The compiled work, along with information from a more recent conversation with veterinarians practicing in the areas of animal rehabilitation, spinal manipulation and acupuncture, aims to assist Transition Council with the consideration of any additional public safeguards outlined as terms, conditions and limitations in the proposed regulatory exemption for chiropractors.

Legislative Framework

As a helpful reference, Section 9 of the *Veterinary Professionals Act, 2024 (VPA)* establishes an authorized activity model for the practice of veterinary medicine in Ontario. This framework is further supported by Schedule One of the *VPA*, where a list of seventeen (17) authorized activities is outlined.

Section 9 (5) 1 of the *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 in Schedule One of the *VPA* as may be prescribed in accordance with any prescribed guidelines, processes, terms, conditions, limitations, or prohibitions.

Summary of Work Since May 14, 2025

Review of Previous Councils' Work

In recognition of Transition Council's questions related to the research and risk analysis behind the proposed exemption, the College revisited the historical work of a number of Councils that contributed to the current proposal. Meetings and conversations with the chiropractic community date back to the 1990s, and a summary of this work is attached to this cover sheet as Appendix A. For a full review of this history, a more detailed table is attached as Appendix B.

Virtual Discussions

In recognition of Transition Council's questions related to veterinary outreach in this area, the College conducted two virtual discussions in June 2025 to ensure that it had the most recent and well-rounded information available. A total of 44 veterinarians who indicated on their license renewal that they perform spinal manipulation and acupuncture were invited to attend. The Ontario Veterinary Medical Association (OVMA) was also offered an observational seat and attended both meetings. 12 veterinarians were able to attend the discussion, and an additional 9 veterinarians provided written responses to the following questions:

- 1) What elements of spinal manipulation and/or acupuncture have you added to your practice? Why?
- 2) How did you become trained in these services?
- 3) How do you obtain clients and patients for these services?
 - a. Do clients seek out your services themselves?
 - b. Do you receive referrals from other practitioners?
- 4) What risks do you see associated with the practice of these services?
- 5) What adverse reactions or incidents have you seen from performing these services?
- 6) What literature or sources do you use to establish and maintain your knowledge about spinal manipulation and/or acupuncture on animals?
- 7) What relationships, if any, have you built in practising in this area?
 - a. Do you have relationships with veterinarians who do not perform these services?
 - b. Do you have relationships with chiropractors who perform these services?

The virtual discussions held with veterinarians reconfirmed the findings of the work of previous Councils'. A summary of the virtual discussions and written responses is attached to this cover sheet as Appendix C.

Additional Context to Assist with Decision-Making

Consultation Feedback

Transition Council received and reviewed consultation feedback related to this regulatory concept at its May 14, 2025 meeting. Full details of the consultation findings can be found in Agenda Item 10.1 of that package.

In summary, the consultation feedback received demonstrated polarized views on this topic, which not surprisingly were dependent on the responding group. Several respondents, including key partner submissions, indicated a hesitancy to agree with the proposed regulatory concept without further requirements such as referrals, adherence to standards, and other components being put in place. Some comments received indicated an interest in more clearly defining expectations for when further collaboration should occur, the need for the sharing of records, and/or when referrals may be required.

Recommendations

Terms, Conditions and Limitations Required to be Met to Provide Authorized Activities (Changes Proposed)

Based on the additional information gathered, and in response to the consultation feedback received, two (2) additional terms, conditions and limitations have now been included in the proposed regulatory exemption for chiropractors for Transition Council's overall consideration.

These additional provisions can be found as tracked changes to the original proposal below:

Recommendation	Reasoning
Has completed at least 200 hours of specific training in animal chiropractic which must have included practical experience.	Specific and formal education in animal chiropractic is required for a chiropractor to upskill their foundational education into practice on animals. As part of this training, it is essential that chiropractors receive hands-on practical experience in the provision of animal chiropractic care.
Has completed at least 35 hours of additional training in chiropractic acupuncture on animals which included practical experience (in addition to the 200 hours in human acupuncture training required by the CCO). ¹	In addition to the formalized training required to be able to safely provide animal chiropractic care, chiropractors require additional training in order to safely provide chiropractic acupuncture on animals.

¹ This component will only need to be met by chiropractors who seek to provide chiropractic acupuncture on animals.

<p>Has the knowledge, skill, and judgment to:</p> <ol style="list-style-type: none"> 1. Perform the authorized actively safely, effectively, and ethically; and 2. Determine the animal's condition warrants performance of the authorized activity based on the known risks and benefits. 	<p>Recognition of the need for chiropractors to reflect on their own knowledge, skills, and judgement to determine whether to proceed with offering authorized activities is fundamental to ensuring public safety and reflects the core principles of professional regulation.</p>
<p>Ensures appropriate coordination and consultation with a veterinarian member in the delivery of chiropractic services including making referrals when required.</p>	<p>The inclusion of this condition would permit the College to engage with the College of Chiropractors of Ontario on the development of additional details in their policy for chiropractors including the areas of:</p> <ul style="list-style-type: none"> - The importance of informing clients about the risks of the lack of continuity of care; - The importance of informing clients about the benefits of record sharing amongst professionals; and - When and how to refer to veterinarian members. <p>This would assist with mitigating risks related to professionals not choosing to coordinate care with the veterinarian of record and increasing the risk of potential poor outcomes for an animal patient.</p>
<p>Ceases treatment and refers the animal to a veterinarian member if they know or ought to have known that the animal's condition could be due to a disease.</p>	<p>The inclusion of this condition aims to mitigate the pervasive concern that without full diagnostics there is a possibility of a disease actually being the primary issue and unfortunately not detected by a chiropractor. As a result, a patient may receive either unnecessary treatment or treatment that delays an appropriate diagnosis which then directly interferes with successful patient outcomes. While this situation may not occur regularly, the risk of occurrence brings with it high stakes decisions for owners who depend on their regulated provider to direct care as needed. This requirement in the VPA regulations would support the College of Chiropractors in clarifying their expectations of the animal chiropractors that they regulate.</p>

As outlined in previous Transition Council packages, chiropractors would not be required to provide proof of their eligibility related to these qualifications to the College of Veterinary Professionals of Ontario (CVPO). Instead, chiropractors would be expected to review the regulatory exemption and determine whether they meet the requirements.

The information contained in this cover sheet has been developed with recognition that chiropractors are regulated professionals registered with the College of Chiropractors of Ontario (CCO) and that alleged professional misconduct related to the authorized activities performed that are permitted by the proposed regulatory exemption would be considered for investigation by CCO. Should the CVPO become aware of a chiropractor who is offering authorized activities to the public outside of those permitted by the proposed regulatory exemption, the CVPO would have the ability to refer the matter to the CCO and to investigate these concerns as unauthorized practice under the risk of harm clause, if warranted.

Permitted Authorized Activities (No Changes Proposed)

The regulatory exemption for chiropractors also proposes that chiropractors who meet the terms, conditions and limitations listed above be permitted to carry out the following authorized activities (or components of) in the course of engaging in the practice of chiropractic on animals:

Authorized Activity	Reasoning
<p>Communicating a chiropractic diagnosis identifying as the cause of an animal's symptoms,</p> <ul style="list-style-type: none"> a. a disorder or dysfunction arising from the structures or functions of the spine and their effects on the nervous system, or b. a disorder or dysfunction arising from the structures or functions of the joints of the extremities. 	<p>Communicating a chiropractic diagnosis related to a disorder or dysfunction of the spine or joints is included as part of the scope of practice for chiropractors under the <i>Regulated Health Professionals Act, 1991</i>. Proper communication of these types of diagnoses is intertwined throughout the College of Chiropractors of Ontario's standards of practice.</p> <p>It is important to note that these proposed allowances pertain only to disorders and dysfunctions, and do not allow for any form of diagnosis related to diseases or conditions.</p> <p>Training for the practice of chiropractic on animals is designed to enable chiropractors to recognize when chiropractic care is needed and when an animal's condition is beyond the chiropractic scope of practice limits. The College of Chiropractors of Ontario reflects this training in its own standards for chiropractors who practise on animals and requires its members to refer to a veterinarian for further care including when a medical diagnosis may be required.</p>

	<p>It would be reasonable to assume that animal owners who seek chiropractic care for their animals expect to receive a chiropractic diagnosis.</p> <p>Examples of these types of diagnoses include:</p> <ul style="list-style-type: none"> • spinal facet joint dysfunction/irritation; • costovertebral joint dysfunction; • sacroiliac dysfunction; and • myofascial restriction. <p>Given this, it is recommended that chiropractors be permitted to offer these specific forms of diagnosis.</p>
Performing a procedure on tissue below the dermis for the purpose of administering chiropractic acupuncture on canines or equines depending on species-specific training.	<p>Chiropractors who have received training in animal chiropractic have the ability to access additional formal and specific training related to the performance of chiropractic acupuncture on animals.</p> <p>This training is specific to animals (in particular dogs and horses) and contains both theoretical and practical elements.</p> <p>Chiropractors would not be permitted to perform this authorized activity unless they have completed this training.</p> <p>In recognition of currently available chiropractic training, Transition Council also proposed that chiropractors only be permitted to perform canine and/or equine chiropractic acupuncture, dependent on their individual species-specific training. In addition, chiropractors who wish to practise chiropractic acupuncture on animals would also be required to meet the College of Chiropractors of Ontario's standard of practice related to acupuncture which includes requirements related to public safety, professional liability insurance, and maintaining competency.</p>
Moving the joints of the spine beyond the animal's usual physiological range of motion using a fast, low amplitude thrust.	<p>Moving the joints of the spine is a fundamental aspect of the practice of chiropractic and is one of the skills that are further developed by chiropractors who seek additional training in animal care.</p>
Putting a finger beyond the anus for the purpose of manipulating the tailbone.	<p>Manipulating the tailbone is another fundamental aspect of the practice of chiropractic and is one of the skills that are further developed by</p>

	chiropractors who seek additional training in animal care.
Applying or ordering the application of the following forms of energy for therapeutic purposes: a. Class IV lasers; and b. Radial shockwave when sedation is not required.	Chiropractors who have received additional training in animal chiropractic also have the ability to access additional formal and specific training related to the use of Class IV lasers and radial shockwave on animals when sedation is not required. The ability for a chiropractor to safely apply these forms of energy has previously been reviewed and approved by Legacy Council through its work related to the use of forms of energy in the treatment and/or care of animals published in 2021 (at that time allowing chiropractors and other non-veterinary animal care providers to apply these modalities upon veterinarian referral). This proposed allowance recognizes this previous work while adapting it to the new proposed model.

For a full review of how this information would appear within the regulatory concept, please see the chart attached as Appendix D.

Discussion

Transition Council is asked to review this additional information and provide its guidance related to the proposed regulatory exemption for chiropractors as presented.

Potential Direction

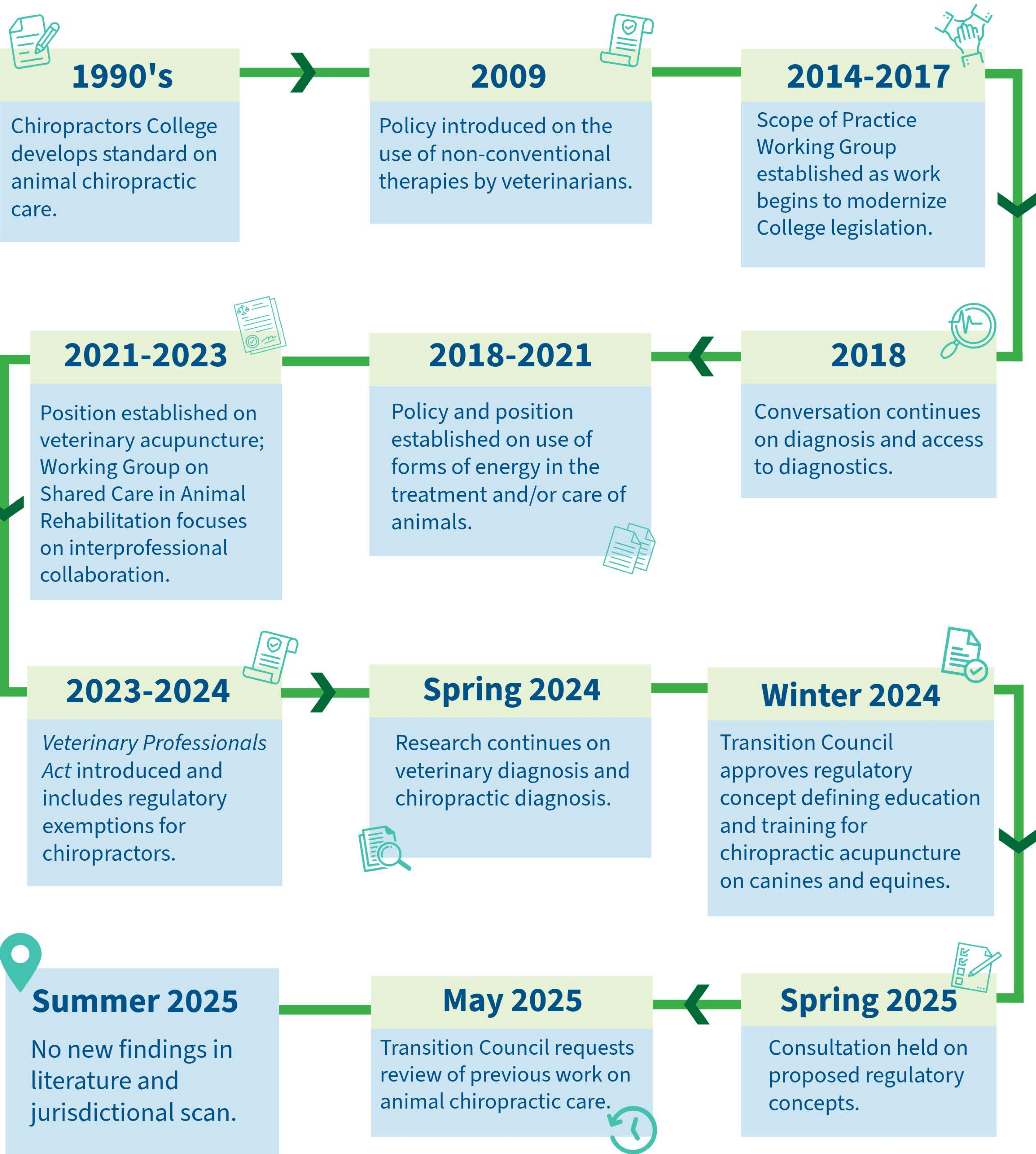
Based on this review and discussion, Transition Council may direct:

1. That the regulatory concept be approved for submission to OMAFA as presented or amended;
2. That the regulatory concept be returned to College staff for further work and consideration; or
3. Any other direction as determined by Transition Council.

Attachments

1. Appendix A – Summary of Historical Work
2. Appendix B – Detailed Table of Historical Work
3. Appendix C – Summary of Virtual Discussions
4. Appendix D – Concept Chart – Regulatory Exemption for Chiropractors (with tracked changes)

College work, research related to chiropractic animal care



	Milestone	Work Completed by College
1990s	Chiropractors College develops standard on animal chiropractic care	<ul style="list-style-type: none"> - Staff level conversations occurring between the College of Veterinarians of Ontario (College) and the College of Chiropractors of Ontario (CCO) - No formal agreement between these organizations - CCO develops a standard in 1998 on animal chiropractic care for their members
2009	Policy introduced on the use of non-conventional therapies by veterinarians	<ul style="list-style-type: none"> - Exchange of letters and other correspondence between the College and CCO - CCO reaching out related to the need to address the public's interest in obtaining animal chiropractic care and support public choice - Correspondence also occurs related to what legislative oversight exists under the <i>Veterinarians Act (VA)</i> and the <i>Regulated Health Professions Act</i> - Develops policy on the use of non-conventional therapies by veterinarians - CCO standard on animal chiropractic care continues - Considerations related to the intersections of veterinary medicine and animal chiropractic care flagged for potential further conversation
2014-17	Scope of Practice Working Group established as work begins to modernize College legislation	<ul style="list-style-type: none"> - Formation of the Scope of Practice Working Group related to legislative reform (veterinarians; veterinary technicians; public members; government members) - Start with review of a 2014 report focused on changing perspectives and strategies for the regulation of scopes of practice including the importance of creating systems for patient care, reviewing different types of professionals and their education and training, and allowing for increased public access and choice whenever possible - Group begins with early considerations related to chiropractic activities (spinal manipulation; access to the tailbone; diagnosis) as well as acupuncture - Recognition that conversations around potential approaches/systems must be about empirical risk and not turf protection - Group discusses whether chiropractic care of animals should be in the public domain and determine that, due to a lack of empirical evidence related to its delivery and safety in animals, it requires ongoing ties to the practice of veterinary medicine and consideration of specific exemptions for chiropractors instead - Group considers the differences between diagnoses and clinical assessment - Also consider the fact that the public can already directly access chiropractic care for themselves and their children - Consensus amongst the Group that bringing chiropractors into the scope of practice model established under a new Act would be beneficial since the risk of harm clause would apply (and would bring more oversight and authority than currently exists under the VA) - Group goes out on public consultation, which includes thoughts related to proposed regulatory exemption for chiropractors - Group reviews consultation feedback, including that received from the Ontario Veterinary Medical Association (OVMA) - Consultation feedback received is varied – many in the veterinary community opposed while many in the chiropractic community seeking further allowances - Further research is conducted to attempt to address these concerns and requests (same amount found as before) - Group comes back to wanting to really focus on creating an integrated and accountable approach to the practice of veterinary medicine and building and supporting animal care teams - Group recommends spinal manipulation; tailbone access; title of doctor for inclusion in the 2018 concept paper to the Ministry - Diagnoses; forms of energy; acupuncture left for further review and conversation

	Milestone	Work Completed by College
2018	Conversation continues on diagnosis and access to diagnostics	<ul style="list-style-type: none"> - Further conversations between the College, veterinarians (including Ontario Veterinary College (OVC)), and chiropractors occur after the submission of the concept paper to the Ministry - Ontario Chiropractic Association (OCA) seeking chiropractic diagnosis; forms of energy (Class IV lasers; radial shockwave); acupuncture. - Not interested in pursuing radiography - Veterinarians' main concerns related to chiropractic care revolve around proper diagnosis and lack of access to diagnostics - Joint meeting held between CVO/OVC/OCA and chiropractic educators to further discuss diagnosis - No changes to the 2018 concept paper position at this time
2018-21	Policy and position established on use of forms of energy in the treatment and/or care of animals	<ul style="list-style-type: none"> - College conducts a research project related to the use of forms of energy in the treatment and/or care of animals - College receives more information on chiropractors' training in and use of Class IV lasers and radial shockwave on both humans and animals - Results in College Council adopting a Position and Policy Statement based on the legislative framework under the VA (activity must be performed by a veterinarian or under a veterinarian's supervision and delegation/referral or it is allowed to be performed in the public domain) - Statements include the ability for veterinarians to refer to non-veterinary animal care providers for Class IV lasers and radial shockwave in recognition of their education and training in this area - Topic is also flagged for further consideration for additional amendments under a new legislative framework
2021-23	Position established on veterinary acupuncture	<ul style="list-style-type: none"> - College conducts a research project related to the performance of acupuncture on animals - Research includes a review of chiropractic education and training in this area (including CCO requirements) - Results in College Council adopting a Position Statement based on the legislative framework under the VA (acupuncture remains a veterinarian only activity) - Topic is also flagged for further consideration for additional amendments under a new legislative framework

	Milestone	Work Completed by College
2021-23	Working Group on Shared Care in Animal Rehabilitation focuses on interprofessional collaboration	<ul style="list-style-type: none"> - College forms a Working Group on Shared Care in Animal Rehabilitation - Group consists of the College, veterinarians, veterinary technicians, physiotherapists, and chiropractors (latter three appointed by respective professional associations) - Group steers away from specific scope of practice conversations in favour of a focus on interprofessional collaboration, teamwork, and public education - Group shows a willingness amongst different animal care providers (veterinary and non-veterinary) to work together
2023-24	Veterinary Professionals Act introduced and includes regulatory exemptions for chiropractors	<ul style="list-style-type: none"> - Ministry announces public consultation on legislative reform - Bill 171 introduced and the Government specifically names members of the CCO as professionals permitted to be granted regulatory exemptions under the Act - Standing Committee hearings occur - College submits its own response as well as reviews all other responses submitted (including the OVMA) - College continues to research and review chiropractic diagnosis and acupuncture – including reviewing research and positions forwarded by the OVMA, CCO, and OCA - Bill 171 is proclaimed (<i>Veterinary Professionals Act, 2024</i>)
Spring/ Summer 2024	Research continues on veterinary diagnosis and chiropractic diagnosis	<ul style="list-style-type: none"> - College focuses its work on the differences between clinical assessment and diagnosis - College increases its research related to the differences between veterinary diagnosis and chiropractic diagnosis - This includes researching the differences in diagnosing a disorder vs. dysfunction vs. disease - Also researching and considering the public's expectation of diagnosis - College conducts another currency review of completed past research, including that related to chiropractic education and training in animal care (especially related to acupuncture), and compares it to the additional training that veterinary professionals seek in this area - College receives additional information from both the OCA and OVMA and conducts a review of the material including seeking legal advice on the positions presented - College's legal team notes the strength of OCA's position related to the CCO's requirements for its members to provide a chiropractic diagnosis in order to truly obtain informed client consent - This work leads to forms of energy (radial shockwave and laser), chiropractic diagnosis, and acupuncture being incorporated into the proposed regulatory exemption for chiropractors

	Milestone	Work Completed by College
Nov-Dec 2024	Transition Council approves regulatory concept defining education and training for chiropractic acupuncture on canines and equines	<ul style="list-style-type: none"> - Regulatory concept for a chiropractor exemption presented to Transition Council for consideration in November 2024 and returned to College staff for further consideration related to potential limitations on acupuncture based on species - Regulatory concept returned to Transition Council in December and approved with an amendment to only permit the performance of chiropractic acupuncture on canines and/or equine based on education and training
Feb-Apr 2025	Regulatory concept consultation held	<ul style="list-style-type: none"> - College goes out on public consultation on the regulatory concepts as approved by Transition Council - Fair amount of feedback received related to regulatory exemption for chiropractors – with similar themes to 2016 consultation - College staff conduct a review of all consultation feedback received – including material from the OVMA – and finds no significant new resources or research being presented from what has been previously reviewed
May 2025	Transition Council requests review of previous work on animal chiropractic care	<ul style="list-style-type: none"> - Regulatory concept on chiropractic exemption presented to Transition Council with no proposed amendments - Transition Council requests a review of all previous work done to help with context and background
May- Aug 2025	No new findings in literature and jurisdictional scan	<ul style="list-style-type: none"> - College staff complete a review of all previous work completed - Also complete an updated literature scan and jurisdictional scan to ensure currency – no new significant findings found – same risk analysis findings as the 2015-2017 and 2021-2022 reviews

Spinal Manipulation and Acupuncture

Virtual Discussion Notes

June 2025

Key Points from Written Submissions

- 1. What elements of spinal manipulation and/or acupuncture have you added to your practice? Why?**

Spinal Manipulation

- Assess musculoskeletal aspects for Spinal (Medical) Manipulation
- Low force techniques (manually or with an Activator)
- Osteopathic adjustments
- PEMF and magnetic therapy
- Fascia manipulation
- Emphasis on use of safe and effective treatment – for musculoskeletal disorders
- Increased demand - particularly with equine athletes who are senior horses because of increased restrictions on medicine usage, etc.
- Offered through mobile practice

Acupuncture

- Primarily dry needling
- Occasionally electro-acupuncture or moxibustion
- Emphasis on use of safe options – pain management, neurological stimulation, myofascial issues
- Offered through mobile practice
- Biopuncture
- Chinese medical exam (tongue, pulse, and acupuncture points)

** May also include diet and herbs

- 2. How did you become trained in these services?**

- Certification for acupuncture through IVAS, AVAC, Curacore, Canine Rehabilitation Institute
- Certification for spinal manipulation through Options for Animals (AVCA), VCLC
- Experience teaching IVAS and VCLC courses
- Training through Chi Institute in Florida for spinal manipulation
- Additional certifications from the US and UK (e.g., Postural Rehabilitation; VCLC; bioregulatory medicine)

3. How do you obtain clients and patients for these services?

- Clients often seek services themselves
- Sometimes through referral from other practitioners (mostly from veterinarians)
- One respondent requests transfer of records and shares report with client's regular DVM

4. What risks do you see associated with the practice of these services?

Acupuncture

- Risk of needling too deep over thorax; or other organs
- Risk of seizure and arrhythmia with electroacupuncture
- Risk of use of acupuncture on pregnant animals and very debilitated animals
- Risk of needle ingestion
- Documented risks: pneumothorax; hematomas at site of placement
- Contraindicated with neoplasia

Spinal Manipulation

- Risk of applying too much force in certain cases (e.g., IVDD or small, delicate patients)
- Documented risks: CVS; exacerbating spinal disc herniation – in both humans and animals
- Risk associated with human chiropractors' inability to perform necessary physical examination prior to treatment
- Emphasis on need for thorough physical and neurological exam prior to treatment – can help identify previously unknown problems that could be causing or contributing to symptoms like weakness in hind end
- Risk associated in missing identification of these underlying problems that might respond better to traditional treatments
- Risk associated with handling animal (e.g., horses, cats)

5. What adverse reactions or incidents have you seen from performing these services?

Acupuncture

- Symptoms may get worse temporarily after the first one or two sessions
- When treating dogs, risk of being bitten when needle is placed in sensitive point
- When treating horses, risk of being kicked if horse gets agitated by the sensation of the needles
- Emphasis on importance in knowing proper handling and restraint
- Risk of animal swallowing needle
- Risk of puncturing organs if not adequately knowledgeable or trained
- Very few adverse reactions seen

Spinal Manipulation

- Symptoms may get worse temporarily after the first one or two sessions
- Patient can be uncomfortable for 24 hours
- Emphasis on importance in knowing proper handling and restraint
- Very few adverse reactions seen

6. What literature or sources do you use to establish and maintain your knowledge about spinal manipulation and/or acupuncture on animals?

Acupuncture

- Difficult to find resources beyond actual courses (and notes from those courses)
- Veterinary acupuncture textbooks for basic knowledge
- Webinars from providers such as CIVT for CE
- Participation in international online forum: Complementary and Alternative Veterinary Medicine
- Prior attendance to the annual American Holistic Veterinary Medical Association conference
- CE through IVAS
- VIN is a good resource (but human chiropractors don't have access)
- Resources from the College of Integrative Veterinary Therapies
- Pubmed search

Spinal Manipulation

- Difficult to find resources beyond actual courses
- Chiropractic textbooks (based on human chiropractic)
- Prior attendance to the annual American Holistic Veterinary Medical Association conference
- Attendance of seminars at the Healing Oasis
- Unsure of how much more is available to learn through VCLC courses on advanced techniques beyond those taught in initial course
- Resources from the College of Integrative Veterinary Therapies
- Pubmed search

Key Points from Virtual Discussions (June 16 & 17, 2025)

- 1. How and why did they decide to incorporate spinal manipulation and/or acupuncture into their practice?**
 - a. Training/education:**
 - i. Initial:**
 1. Courses/certification through AVCA
 2. Acupuncture Foundation of Canada

3. IVAS certification
 4. Options for Animals course
 5. VCLC
 6. Started in homeopathy
 7. Trained in Chinese medicine specifically
 8. Chi Institute
 9. Colorado State
 - ii. Continuing:
 1. Time spent at McTimoney College of Chiropractic
 2. Courses with Sarah Willoughby
 3. Osteopathy training as well
 - b. Why:
 - i. Saw it as a beneficial form of treatment
 - ii. Explored it as a practice with difficult cases
 - iii. Desire for multi-modality/integrative treatment
 - iv. Wanted something else to help with pain management – saw improvement in animals, which was a big reason to keep practising
 - v. Clients desired these forms of treatment
 - vi. Pursued it to round out their holistic practice
 - vii. Frustrated with clients coming in who had gone to human chiropractors
- 2. Where do their clients come from? Referral from practitioners? Self-referral? Etc.?**
 - a. Some get clients from referral from practitioners, self-referral, and offered as add-on to mainstream practice
 - b. Others emphasize not getting a lot of referrals from practitioners, and more often getting clients through self-referral or built-up practice
- 3. What are the risks and adverse effects associated with these practices?**
 - a. Stiffness/soreness for 24-48 hours after treatment
 - b. Tiredness (if too many needles are used)
 - c. Risk of misdiagnosis and delay of treatment
 - i. After 3-5 treatments, many will re-assess whether the treatment is working (even as early as 1 treatment they may have a sense that the treatment isn't working)
 - d. Lost needles; puncturing organs (although no one has seen that happen; risk or puncturing tumor or thorax described as low)
 - e. Risk of being bitten/kicked b/c of improper handling/restraint
- 4. What are their relationships with other veterinarians and chiropractors like?**
 - a. Some describe communication with non-veterinary providers as challenging, others have more relationships with local providers

- b. Sometimes difficulty in getting clients or colleagues to share records
- c. Some have vets or chiro's who refer patients to them
- d. A few emphasized that they always tell the client to go back to their vet if they say that their vet doesn't know they're seeking acupuncture/chiropractic

5. How do they maintain knowledge/competency in these areas?

- a. It can be challenging to find resources or CE on animal chiropractic and acupuncture
- b. Examples:
 - i. Association of Veterinary Acupuncturists of Canada, College of Veterinary Integrative Therapy, International Veterinary Acupuncture Society, Eastern Currents conference, Chi University, Dr. Nell Ostermeier trainings (Acupuncture Mastermind), Teaching Assistant for Canada Certified Veterinary Acupuncture 2023, VIN Integrative Medicine message board, CVMA/OVMA conference
 - ii. Conferences; symposiums
 - iii. Webinars; courses through continuing certification
 - iv. Use of human chiropractic resources/courses
- c. Look for courses/trainings that are accessible, affordable, from source with certified regulatory board; hands-on training

Concept Chart - Chiropractors

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
This column outlines the specific section of regulation.	This column provides a description of the objectives sought and the associated reasoning.	This column provides any additional specific information required to ensure clarity.	This column outlines when Transition Council confirmed the concept as well as any additional questions raised.
Chiropractors	<p>General</p> <p>Section 9 (5) 1 of the <i>Veterinary Professionals Act, 2024 (VPA)</i> states that regulation language may be developed to allow for “a person who, under the <i>Chiropractic Act, 1991</i>, 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.</p> <p>Overview</p> <p>Certain chiropractors possess a specific set of skills, knowledge, and training that allow them to safely perform some authorized activities.</p> <p>Regulatory Exemption for Chiropractors</p> <p>Transition Council proposes a regulatory exemption for chiropractors who are duly registered members of the College of Chiropractors of Ontario (CCO) in the general</p>	<p>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.</p> <p>Chiropractors are regulated professionals registered with the College of Chiropractors of Ontario (CCO) and alleged professional misconduct related to the authorized activities</p>	<p>Transition Council engaged in several conversations related to the proposed regulatory exemption for chiropractors including related to the ability to provide a diagnosis and to perform acupuncture.</p> <p>Concerns related to accountability in these areas were determined to be appropriately mitigated through both the CVPO's oversight as well as the CCO's willingness to provide oversight of their</p>

Chiropractors - Appendix D

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<p>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 CCO including those specific to animal care.</p> <p>Additional Requirements for Qualification under Regulatory Exemption</p> <p>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:</p> <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> ○ Perform the authorized actively safely, effectively, and ethically; and ○ Determine the animal's condition warrants performance of the authorized activity based on the known risks and benefits. 	<p>performed that are permitted by the proposed regulatory exemption would be considered for investigation by the CCO. Should the CVPO become aware of a chiropractor who is offering authorized activities to the public outside of those permitted by the proposed regulatory exemption, the CVPO would have the ability to refer the matter to the CCO and to investigate these concerns as unauthorized practice under the risk of harm clause, if warranted.</p> <p>Communicating a chiropractic diagnosis related to a disorder or dysfunction of the spine or joints is included as part of the scope of practice for chiropractors under the <i>Regulated Health Professionals Act, 1991</i>. Proper communication of these</p>	<p>members practice in animal care.</p> <p>Transition Council confirmed the proposed regulatory exemption for chiropractors in December 2024.</p>

Chiropractors - Appendix D

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<ul style="list-style-type: none"> <u>The chiropractor must ensure appropriate coordination and consultation with a veterinarian member in the delivery of chiropractic services including making referrals when required.</u> <u>The chiropractor must cease treatment and refer the animal to a veterinarian member if they know or ought to have known that the animal's condition could be due to a disease.</u> <p>The requirement for hours related to chiropractic acupuncture will only be required for those chiropractors who seek to provide this service.</p> <p>Additional Details Related to Chiropractic Acupuncture</p> <p>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.</p> <p>Authorized Activities Permitted to be Performed by Chiropractors</p> <p>Transition Council proposes that any chiropractor who meets the above-mentioned criteria be permitted to perform the following authorized activities:</p> <ul style="list-style-type: none"> Communicating a chiropractic diagnosis identifying as the cause of an animal's symptoms, 	<p>types of diagnoses is intertwined throughout the CCO's standards of practice.</p> <p>It is important to note that these proposed allowances pertain only to disorders and dysfunctions, and do not allow for any form of diagnosis related to diseases or conditions.</p>	

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Chiropractors - Appendix D

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<ul style="list-style-type: none"> ○ 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: <ul style="list-style-type: none"> ○ Class IV lasers; and ○ Radial shockwave when sedation is not required 		



AGENDA ITEM 7.2

TOPIC: After-Hours Veterinary Care

History of Topic

General Information

Section 20 of Regulation 1093 made under the *Veterinarians Act (VA)* requires veterinarians to provide reasonably prompt services outside of regular practice hours if the services are medically necessary for animals that they have recently treated or treat regularly. In addition to this overarching requirement, Section 20 also states that a veterinarian:

- can provide these services themselves or by referral to another veterinarian;
- is responsible for promptly continuing to provide medically necessary services to an animal after discharge from an emergency clinic; and
- is responsible for informing their clients about their after-hours veterinary care arrangements.

The College's *Policy Statement: After-Hours Care Services* provides additional detail and guidance related to the provision of after-hours veterinary care services, including information related to its interconnectivity with members' obligations such as the veterinarian-client-patient relationship (VCPR), the importance of establishing agreed-upon referral arrangements, and how to manage unforeseen circumstances.

The inclusion of veterinary technicians as members of the College of Veterinary Professionals of Ontario (CVPO) under the *Veterinary Professionals Act, 2024 (VPA)* necessitates the updating of regulation language related to the provision of this care and offers the opportunity to increase clarity and understanding of its associated requirements.

Legislative Framework

Section 20 of Regulation 1093 made under the VA:

20. (1) A member is responsible for providing reasonably prompt services outside of regular practice hours if the services are medically necessary for animals that he or she has recently treated or that he or she treats regularly. R.R.O. 1990, Reg. 1093, s. 20 (1).

(2) The services required under subsection (1) may be provided by the member or an associate or by referral to another member who has agreed to cover the referring member's practice. R.R.O. 1990, Reg. 1093, s. 20 (2).

(3) If a member provides services under subsection (1) outside of regular practice hours by referring an animal to an emergency clinic, the member is responsible for promptly continuing to provide medically necessary services to the animal after discharge from the emergency clinic until the services are no longer required or until the client has had a reasonable opportunity to arrange for the services of another member. R.R.O. 1990, Reg. 1093, s. 20 (3).

(4) A member shall inform each of his or her clients as to how they can access services outside of the member's regular practice hours. O. Reg. 233/15, s. 14.

(5) If a member changes the arrangements for accessing services outside of the member's regular practice hours, he or she shall promptly inform his or her clients of the changes. O. Reg. 233/15, s. 14.

(6) The member shall keep records of every time information is provided under subsections (4) and (5). O. Reg. 233/15, s. 14.

(7) If an animal is to be left in a veterinary facility after regular practice hours, the member treating the animal shall inform the client of supervision arrangements for that animal. O. Reg. 233/15, s. 14.

VPA

Section 93 (1) 23 of the VPA allows for the development of regulation language "prescribing and governing standards of practice of veterinary medicine and standards for veterinary facilities, including respecting standards for the use of technology in the practice of veterinary medicine, when technologies may be used and the manner and circumstances in which they may be used."

Development of Regulatory Concept by Transition Council

Transition Council reviewed and forwarded for public consultation a regulatory concept related to after-hours veterinary care in January 2025. Many of the ideas outlined in the concept were informed by the work and recommendations of the College's After-Hours Veterinary Care Taskforce. This concept included:

1. Ongoing After-Hours Requirements

Section 20 of Regulation 1093 made under the VA 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 proposed the development of regulation language that continues these requirements.

2. Enhanced Wording Related to After-Hours Veterinary Care Arrangements

Transition Council proposed 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 only emergency facilities). Transition Council proposed 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.

3. Clarity Around Discharge Responsibilities

Transition Council proposed 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.

4. Delivery of Care

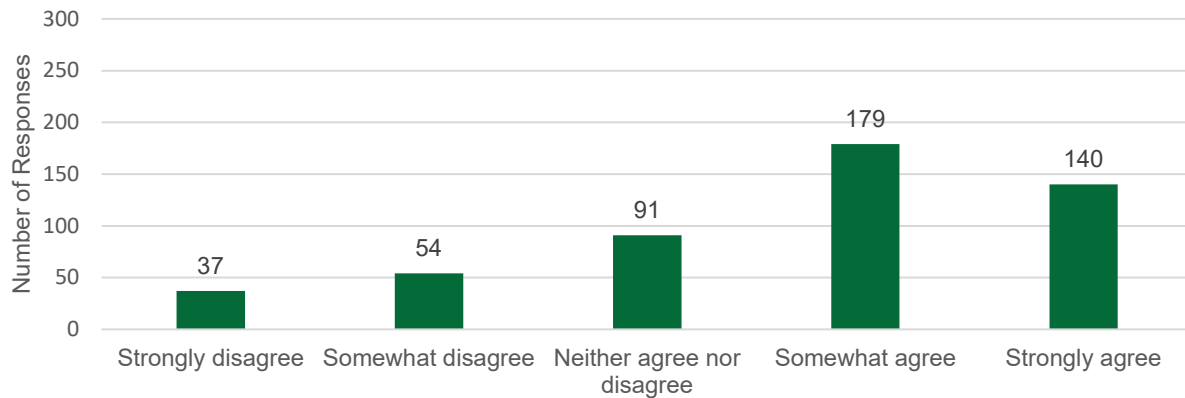
Transition Council proposed that the provision of after-hours veterinary care remain a veterinarian member responsibility. This does not preclude veterinary technician members from also assisting in the delivery of this care through accredited veterinary facilities including through initiation and/or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

General Consultation Feedback

A regulatory concept related to after-hours veterinary care was included in the list of regulatory concepts that were circulated for public consultation from February 11 to April 16, 2025.

The following quantitative responses were received related to after-hours veterinary care:

Survey respondents were asked to indicate their agreement with a statement about After-Hours Veterinary Care on a Likert scale of responses from "Strongly disagree" to "Strongly agree". The figure below presents the results of 501 responses to the statement "*The proposed approach to after-hours veterinary care is appropriate.*".



In addition to the quantitative data, the following qualitative trends were noted:

- Requests for clarity related to available emergency veterinary care referrals in relation to acceptable distance and what may qualify as timely and prompt;
- Requests for clarity related to the role of telemedicine in the provision of after-hours veterinary care; and
- Requests for clarity on the requirements of the agreement between a veterinarian and another veterinarian and/or accredited veterinary facility related to the provision of after-hours veterinary care.

For more information on this consultation feedback, please refer to pages 53-55 of the full consultation report [found here](#).

Consultation Feedback from Key Partners

Ontario Veterinary Medical Association (OVMA)

In its April 15, 2025, submission the OVMA shared:

- Suggestion that the regulations and policies be structured to ensure that care remains tied to the veterinarian-client-patient relationship (VCPR), and that only veterinarians should be permitted to establish the VCPR; and
- Requests for the CVPO to provide education to the public regarding after-hours veterinary care expectations and applications.

Ontario Association of Veterinary Technicians (OAVT)

In its April 16, 2025, submission the OAVT noted that it had no further comments to provide on this topic at this time.

Other Submissions

- Support for after-hours veterinary care remaining a veterinarian responsibility
 - o Ontario Association of Bovine Practitioners (OABP); ProVet Alliance
- Requests for clarity related to what qualifies as reasonably prompt

- OABP

For more information related to these submissions, please refer to the beginning of page 132 of the full consultation report [found here](#).

Further Information Gathered Based on Consultation Feedback

1. Inclusion of Veterinary Technicians in Providing After-Hours Veterinary Care

As noted above, the regulatory concept proposes that the provision of after-hours veterinary care remain the professional responsibility of veterinarian members. This does not preclude veterinary technician members from also assisting in the delivery of this care through accredited veterinary facilities including through initiation or under a veterinarian member's order or delegation. The approach for care delivery would be determined by the veterinary team at the veterinary facility.

2. Further Guidance to be Provided Through Policy

It is the intention of the College to facilitate the development of additional policy and guidance related to the provision of after-hours veterinary care services including how both members may play a role in its provision. An example of a possible resource (a decision flow chart) has been attached to this cover sheet as Appendix "A" to help illustrate these intentions.

Additional Context to Assist with Decision-Making

1. Transition Council Discussions Related to Members' Obligations

Transition Council reviewed and approved a regulatory concept related to members' obligations (known in policy as the VCPR and informed client consent) at its May 2025 meeting. As part of this approval, Transition Council proposed that the wording contained in Section 18 of Regulation 1093 remain as currently written and that no specific reference or connection to terms such as the VCPR or informed client consent be included within regulatory language developed under the VPA. This direction has been incorporated into the regulatory concept related to members' obligations as well as into the current proposed regulatory concept related to after-hours veterinary care.

For a full review of how this information would appear within the regulatory concept, please see the chart attached as Appendix "B".

Transition Council Discussion

The information contained in this cover sheet is being presented to Transition Council for its review and discussion related to next steps. To aid in this discussion, Transition Council is encouraged to consider if any further clarification or additional information is necessary prior to providing its direction.

Potential Direction

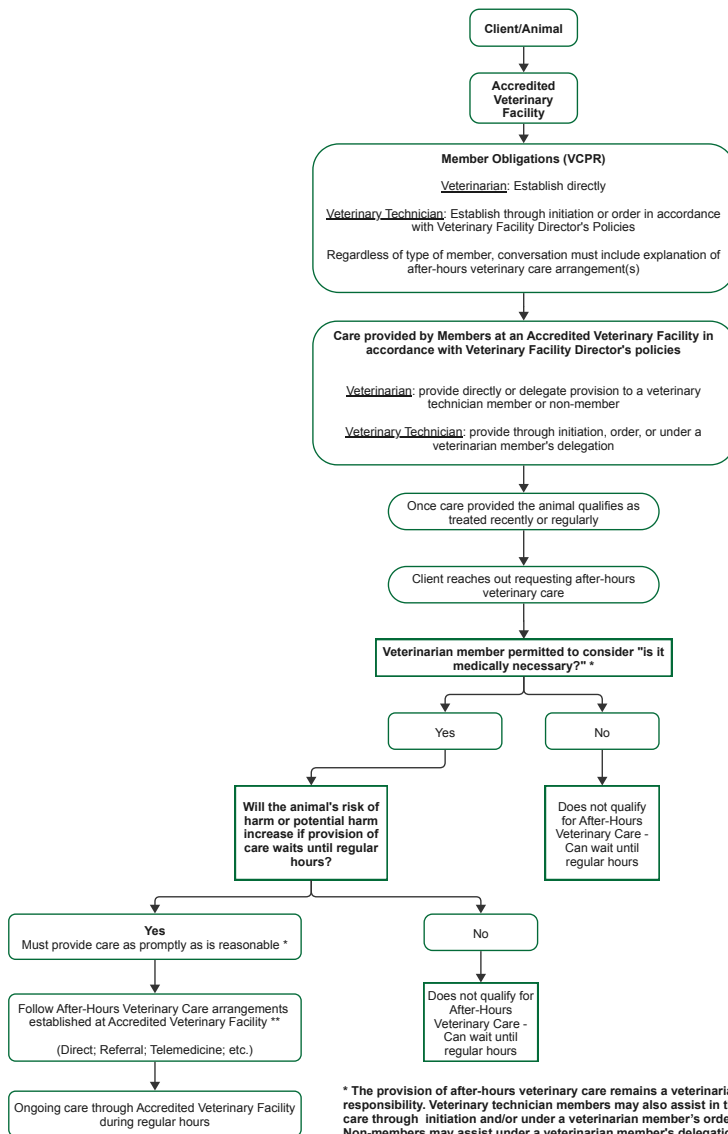
Based on this review and discussion, Transition Council may direct:

1. That the regulatory concept be approved for submission to OMAFA as presented or amended;
2. That the regulatory concept be returned to College staff for further work and consideration; or
3. Any other direction as determined by Transition Council.

Attachments

1. Appendix A – After-Hours Veterinary Care – Decision Flow-Chart
2. Appendix B – Regulatory Concept – After-Hours Veterinary Care

After-Hours Veterinary Care



* The provision of after-hours veterinary care remains a veterinarian member responsibility. Veterinary technician members may also assist in the delivery of this care through initiation and/or under a veterinarian member's order or delegation. Non-members may assist under a veterinarian member's delegation.

** Veterinarian members remain professionally responsible if arrangements with another veterinary facility fall through

Concept Chart – After-Hours Veterinary Care

Section	Primary Concepts Confirmed by Council	Additional Information	Date of Confirmation
This column outlines the specific section of regulation.	This column provides a description of the objectives sought and the associated reasoning.	This column provides any additional specific information required to ensure clarity.	This column outlines when Transition Council confirmed the concept as well any additional questions raised.
After-Hours Veterinary Care	<p>General</p> <p>Transition Council proposes the development of regulation language related to after-hours veterinary care in accordance with Section 93 (1) 23 of the <i>Veterinary Professionals Act, 2024</i>.</p> <p>Purpose</p> <p>The College of Veterinary Professionals of Ontario (CVPO) will be responsible for providing overarching requirements for the practice of veterinary medicine in Ontario.</p> <p>Overview</p> <p>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).</p>	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.	Transition Council confirmed the regulatory concept related to veterinary after-hours care in January 2025.

Section	Primary Concepts Confirmed by Council	Additional Information	Date of Confirmation
	<p>Ongoing After-Hours Care Requirements</p> <p>Section 20 of Regulation 1093 made under the <i>Veterinarians Act</i> 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.</p> <p>Enhanced Wording Related to After-Hours Veterinary Care Arrangements</p> <p>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.</p>		

Section	Primary Concepts Confirmed by Council	Additional Information	Date of Confirmation
	<p>Clarity Around Discharge Responsibilities</p> <p>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 type of veterinarian member and/or accredited veterinary facility referred to.</p>		



AGENDA ITEM 7.3

TOPIC: Proposed Regulatory Exemption for Members

Overview

This cover sheet has been developed to provide Transition Council with the necessary background and context to aid its further consideration of and potential direction related to a regulatory concept on exemptions for members.

One of the many proposed regulatory concepts for consideration to support the *Veterinary Professionals Act, 2024 (VPA)* is regulatory exemptions for members. This concept was discussed at length at the January 9, 2025, meeting of Transition Council and the following were approved for circulation and consultation:

Pathway One

Allowance for members working as employees of the Crown and/or under the oversight of another piece of federal or provincial legislation to provide authorized activities outside of an accredited veterinary facility.

Pathway Two

Allowance for a veterinary technician member to perform lower-risk clinical activities and certain authorized activities outside of an accredited veterinary facility in accordance with a treatment plan created by a veterinarian member.

Pathway Three

Allowance for a veterinary technician member to perform lower-risk clinical activities and certain authorized activities outside of an accredited veterinary facility upon receiving a written referral from a veterinarian member.

Pathway Four

Allowance for veterinary technician members working as employees of non-veterinary animal care providers who are performing authorized activities under specific statutory exemptions.

Please see Item 7.1 in the January 9, 2025 Transition Council package for full details on the previous discussion. A copy of the Minutes for this item are attached to this cover sheet as Appendix A.

Consultation

The regulatory concept related to regulatory exemptions for members was included in the list of regulatory concepts that were circulated for public consultation from February 11 to April 16, 2025. For this proposed regulatory concept, a range of responses were received that indicated mixed agreement with the concept as presented. For more information on this consultation feedback, including submissions from key partners such as the Ontario Veterinary Medical Association (OVMA) and Ontario Association of Veterinary Technicians (OAVT), please refer to Appendix B and pages 32-33 of the full consultation report found [here](#).

Further Information Gathered Since Consultation

The College has received a variety of additional information from different sources since the proposed regulatory concept was circulated for public consultation. Through further staff level analysis of consultation feedback received, additional legal perspectives, and discussions more generally, it became clear that certain regulatory concept pathways for member exemptions, particularly the exemptions for veterinary technician members to practise independently from an accredited veterinary facility, were raising questions related to whether sufficient regulatory oversight and public protection were being achieved.

While some pathways continue to have full oversight of the licensed member (veterinarian or veterinary technician) and their practise, some do not. In particular, legal advice has indicated that the level of independence afforded to veterinary technicians in Pathways 3 and 4 is in fact greater than that currently afforded to veterinarians. As a result, these licensed veterinary technicians would be neither accountable to practise from an accredited facility or in collaboration with a veterinarian while practising authorized activities. This is not in the public interest related to the safety of veterinary care and animal health and welfare.

As a result, Transition Council is being asked to revisit each of the proposed pathways with an enhanced lens on consistency with the CVPO's overall responsibility to uphold and protect the public and its animals.

Recommendations

Transition Council is asked to consider the following recommendations:

Recommendation A) It is recommended that Transition Council continue with the proposed regulatory concept for member exemptions for the first two pathways with minor edits:

Pathway One – Members Working for the Crown or Under Another Piece of Legislation (Minor Revision)

The first pathway Transition Council is being asked to approve is the ability for members to carry out authorized activities outside of an accredited veterinary facility if they work for the Crown or under another piece of federal or provincial legislation.

This pathway supports the longstanding approach to member regulation under the existing *Veterinarians Act (VA)* and clearly supports public safety.

The two minor revisions from the January 2025 package being proposed are:

1. That the proposed pathway no longer include the requirement for members to not carry out authorized activities on publicly owned animals as this may occur in situations such as management of infectious diseases; and
2. That the *Animals for Research Act* be the only additional piece of federal or provincial legislation under which a member can carry out authorized activities outside of an accredited veterinary facility since all other pieces of relevant legislation reviewed (including the *Provincial Animal Welfare Services Act, 2024*) require the member to be directly employed or contracted by the Crown in order to provide services.

Pathway Two – Veterinary Technician Members Working Under a Veterinarian Member's Treatment Plan (Minor Revision)

The second pathway Transition Council is being asked to approve relates to the ability for a veterinary technician member to carry out authorized activities outside of an accredited veterinary facility if they are working under and in accordance with a veterinarian member's treatment plan.

Proposed changes to this pathway are limited. The College has confirmed that there is ongoing interest at the Ministerial level in ensuring this regulatory exemption as it is clearly connected to a veterinarian member's oversight and accountability.

The minor revision to the January 2025 package being proposed is:

1. That the proposed pathway be amended to separate a veterinary technician member's requirements related to the use of drugs and supplies into two categories:
 - a. For drugs – a veterinary technician member would be required to use the drugs prescribed by the veterinarian member, instead of provided, to allow for clients to obtain drugs from their dispenser of choice; and
 - b. For supplies – a veterinary technician member would be permitted to use their professional judgement to determine what supplies are appropriate and suitable for carrying out the treatment plan.

Recommendation B) It is recommended that Transition Council discontinue the development of a proposed regulatory concept for member exemptions for the final two pathways:

Pathway Three – Veterinary Technician Members Working based upon a Written Referral from a Veterinarian Member (Suggested Removal)

The third pathway Transition Council is being asked to revisit relates to the ability for a veterinary technician member to carry out authorized activities outside of an accredited veterinary facility if they are working based upon a written referral from a veterinarian member.

This pathway is being presented for potential removal from the proposed member exemptions for the following reasons:

1. There are no current regulation-making powers that would allow for an exemption of this nature, namely permitting a member to not adhere to the practise of authorized activities from an accredited facility as defined in the *VPA*¹;
2. The exemption as currently envisioned would create a parallel system to the CVPO's accreditation program in which independent veterinary technician businesses could operate without having to adhere to the same level of oversight and accountability as veterinarians and accredited veterinary facilities; and
3. The CVPO would have to rely on its mandatory quality assurance program to oversee the carrying out of authorized activities from these independent veterinary technician businesses, which is not the intention nor the nature of the program. Likely more important, is that the quality assurance program does not yet exist.

It is proposed that Transition Council strongly recommend that the future Council of the CVPO research the opportunity to expand the facility accreditation model to allow for veterinary technician members to hold a Certificate of Accreditation and serve as Veterinary Facility Directors so that they could offer certain authorized activities (such as those associated with animal rehabilitation) directly to the public. Fully exploring and consulting on these possibilities is in the interest of public access to veterinary care for their animals.

Pathway Four – Veterinary Technicians Members Employed by Non-Veterinary Animal Care Providers Operating under Certain Statutory Exceptions or Regulatory Exemptions (Suggested Removal)

The fourth pathway Transition Council is being asked to revisit relates to the ability for veterinary technician members to carry out certain authorized activities outside of an accredited veterinary facility if they were employed by a non-veterinary animal care provider who offered these services directly to the public by way of statutory exception or regulatory exemption.

This pathway is being presented for potential removal from the proposed member exemptions for the following reasons:

¹ “veterinary facility” means a building, a vehicle or land, or any combination of them, used or intended to be used as a place in or from which a member carries out authorized activities in the practice of veterinary medicine

1. There are no current regulation-making powers that would allow for an exemption of this nature, namely transferring oversight of a licensed member to a third-party non-accredited business;
2. Currently, veterinarian members who work for these employers are required to obtain accredited veterinary facilities in order to offer their services; and
3. The CVPO would have to rely on its mandatory quality assurance program to oversee the carrying out of authorized activities by these members, which is not the intention of the program and currently, the quality assurance program does not yet exist.

It is instead Transition Council strongly recommend that the future Council of the CVPO research the possibility of proposing an allowance for all members (both veterinarians and veterinary technicians) to carry out certain authorized activities outside of an accredited veterinary facility when working for these types of employers.

Discussion

The topic of exemptions for members, both veterinarians and veterinary technicians, is a challenging one. There are many strong positions from partners on the best direction forward. Transition Council is being asked to consider all decisions grounded in the public interest at this time to ensure animal health and welfare.

There is no debate as to the competence and skill of veterinary technicians or their ability to contribute to veterinary teams and positive animal health outcomes. The issue at this time is whether the College currently possesses the correct tools to provide oversight and protection of the public interest appropriately and as expected.

Although the discussion is largely along a continuum of permissions related to veterinary technicians and their skillsets, there is lack of information and evidence to support a change in the approach of the VPA which indicates all authorized activities occur from a veterinary facility accredited by the College. At this time, without additional substantive information, and accurate data on the actual nature of the practices under consideration, these businesses need to affiliate with accredited facilities overseen by veterinarians.

It is clear that veterinary technicians have been embracing an entrepreneurial spirit, as do their veterinarian colleagues. However, veterinary technician businesses currently exist outside of any regulatory framework. As veterinary technicians move to become licensed members, they too will need to adapt to practise within an accredited veterinary facility model as do their veterinarian colleagues.

While the data is minimal, and the plans of veterinary technician business owners cannot be anticipated, it is important to acknowledge that the change will impact their existing practices. Once final regulations have been proclaimed it will be important for the College to support these veterinary technician business owners in transition. Education materials, communications, accreditation advisors and other helpful tools will be essential to create successful outcomes.

Given that each pathway has its own specific considerations, Transition Council is asked to provide specific direction on each individually.

Motion One: Members Working for the Crown or under Another Piece of Legislation – Proposed Minor Revisions

Motion Two: Veterinary Technician Members Working under a Veterinarian Member's Treatment Plan – Proposed Minor Revisions

Motion Three: Veterinary Technician Members working based upon a Written Referral from a Veterinarian Member - Suggested Removal

Motion Four: Veterinary Technicians Members Employed by Non-Veterinary Animal Care Providers Operating under Certain Statutory Exceptions or Regulatory Exemptions - Suggested Removal

Based on its review and discussion, Transition Council may direct for each motion:

1. That the proposed pathway be approved for submission to OMAFA as presented or amended;
2. That the proposed pathway be removed from the regulatory concept related to member exemptions;
3. That the proposed pathway be returned to College staff for further work and consideration; or
4. Any other direction as determined by Transition Council.

Attachments

1. Appendix A – January 9, 2025 Transition Council Minutes – Item 7.1
2. Appendix B – Consultation Feedback



MINUTES

Transition Council

January 9, 2025

2:30 – 4:30 pm

Virtual

7.1. Integrating Existing Veterinary Technician Roles Outside of Accredited Veterinary Facilities Under the Veterinary Professionals Act, 2024

Ms. Jan Robinson introduced this agenda item noting that at its last meeting, Council asked College staff to further consider and research potential pathways for assuring that the roles that veterinary technicians have currently established outside of accredited veterinary facilities could continue with appropriate public protection safeguards under the new *Veterinary Professionals Act, 2024*.

Ms. Sarah Kirby went on to outline the options that College staff provided for veterinary technicians currently working outside of accredited facilities to transition over into the new framework while ensuring regulatory oversight and accountability. Five pathways were presented for Transition Council's consideration for public consultation. The pros and cons, the authority for the regulatory exemption and the conditions associated with the regulatory allowance were outlined for the five pathways. Full details were provided in the discussion paper found in the package.

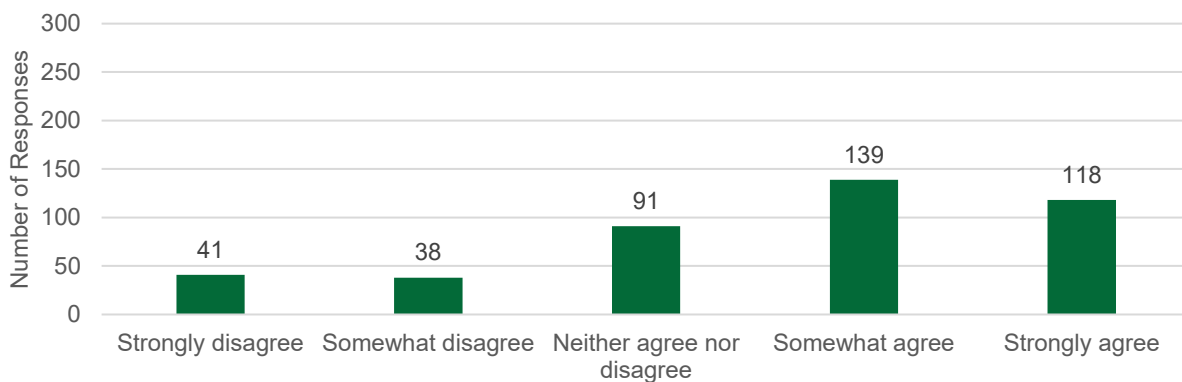
A discussion ensued and the Registrar and Ms. Kirby answered questions posed by Council. Council provided a general agreement for the five proposed pathways to be included in a regulatory concept related to the authorized activity model.

General Consultation Feedback

The regulatory concept related to regulatory exemptions for members was included in the list of regulatory concepts that were circulated for public consultation from February 11 to April 16, 2025.

The following quantitative responses were received related to regulatory exemptions for members:

Survey respondents were asked to indicate their agreement with a statement about regulatory exemptions for members on a Likert scale of responses from “Strongly disagree” to “Strongly agree”. The figure below presents the results of 427 responses to the statement “*The proposed exemptions for members are sufficiently inclusive to cover current practices.*”.



Approximately 60% (257/427) of respondents were in agreement (somewhat agree/strongly agree) that the proposed exemptions for members are sufficiently inclusive to cover current practice.

In addition to the quantitative data, the following qualitative trends were noted:

- Requests for clarity related to the tasks that can be performed by veterinarian technicians, allied professionals, and non-veterinary staff; and
- Requests to ensure that the quality of animal care continues.

For more information on this consultation feedback, please refer to pages 32-33 of the full consultation report found [here](#).

Consultation Feedback from Key Partners

Ontario Veterinary Medical Association (OVMA)

In its April 15, 2025, submission the OVMA shared:

- Support for a regulatory exemption for members working for the Crown or under another piece of legislation;

- Support for a regulatory exemption for veterinarian technician members working under a veterinarian member's treatment plan;
- Support for the remaining models if related to low-risk activities and those in the public domain; and
- Request for consultation and impact studies to be performed before any further changes to business models. This comment from the OVMA is consistent from the date of the introduction of Bill 171 and has been their position throughout the College's consideration of this topic. The OVMA strongly believes that discussion and decisions related to a veterinary technician acting as a Veterinary Facility Director and/or running a business separate and apart from a veterinarian require broad and fulsome consultation with the profession and is best left for the first Council of CVPO.

Ontario Association of Veterinary Technicians (OAVT)

In its April 16, 2025, submission the OAVT shared:

- Suggestion to split the regulation language into "supplies" and "drugs" and specify that drugs must be "prescribed by" rather than "provided by";
- Request to ensure that regulation explicitly allows veterinary technician members to use their professional judgement regarding the supplies they use; and
- Request to ensure that unlicensed individuals cannot perform a greater scope of authorized activities than a veterinary technician member working for the employer.

Other Submissions

- Support for a regulatory exemption for members working under another piece of legislation
 - o Ontario Association of Veterinary Technicians – Rabies Response Program
- Questions around how accountability and recordkeeping will work for businesses
 - o Alberta Veterinary Medical Association
- Request for ongoing consideration of swine veterinarians working outside of veterinary facilities
 - o Ontario Association of Swine Veterinarians; Ontario Association of Poultry Veterinarians

For more information related to these submissions, please refer to the beginning of page 132 of the full consultation report found [here](#).



AGENDA ITEM 7.4

TOPIC: Regulatory Exemption for Non-Members – Owners and Custodians under the *Provincial Animal Welfare Services Act, 2019*

Overview

Introduction

Transition Council has previously reviewed and approved several proposed regulatory exemptions for non-members for submission to the Ontario Ministry of Agriculture, Food, and Agribusiness (OMAFRA). This includes proposed regulatory exemptions related to pharmacy professionals, animal rehabilitation, farriers and hoof trimmers, and mass culls.

During the public consultation on these proposed regulatory exemptions, the College was contacted by the Ministry of the Solicitor General (SOLGEN) related to its administration of the *Provincial Animal Welfare Services Act, 2019 (PAWS)* and the ongoing work of its Animal Welfare Services division. This resulted in a series of conversations between the College and SOLGEN related to their area of Ministerial oversight and its administration in Ontario.

Most of the topics covered during these conversations confirmed that the current structure of the *Veterinary Professionals Act, 2024 (VPA)* intersected cohesively with *PAWS* and the work of Animal Welfare Services. Further, already proposed regulatory exemptions – such as those allowing for members who are employees of the Crown to carry out authorized activities outside of accredited veterinary facilities – addressed potential concerns related to members who work as Animal Welfare Inspectors.

As these conversations progressed, one area of potential concern was raised related to the ability for Animal Welfare Services to work with non-members to provide sheltering and ongoing care of animals under its custody. This resulted in a review of the current statutory exception under the *VPA* related to the ability for non-members to carry out a veterinarian member's treatment plan based on the direction of the owner which in turn has prompted the information contained in this cover sheet for Transition Council's review and consideration.

Legislative Framework

Section 2 of Schedule 1 of the *VPA* contains the following statutory exemption for non-members:

The administration of a treatment plan by a custodian of an animal if the treatment plan is made by a veterinarian member and carried out at the direction of the owner.

This statutory exception contains three main players:

Custodian: the person carrying out the veterinarian member's treatment plan.

Veterinarian Member: the veterinary professional required to develop the treatment plan.

Owner: the legal owner of the animal.

Section 93 (1) 8 of the *VPA* states that, subject to the approval of the Lieutenant Governor in Council, the Council may make regulations:

Prescribing exceptions for the purpose of Section 10 or 11 (of the *VPA*) or limiting or clarifying the exceptions set out in sections 2 and 3 of Schedule 1.

Relevant Background Information

Conversations between the College and SOLGEN have identified a potential need to clarify the role and responsibilities that Animal Welfare Services and Animal Welfare Inspectors have over an animal(s) or group of animals when they are removed or seized in accordance with the *PAWS Act*.¹

The College has confirmed with SOLGEN that there are circumstances where Animal Welfare Services takes custody of an animal(s) or group of animals that it believes has been subject to an offence under *PAWS*. When Animal Welfare Services takes custody of said animal(s), it is responsible for safeguarding the animal(s)' well-being (including providing any necessary

¹ **Removal – 31(1)** - An animal welfare inspector may remove an animal from the place where it is and take possession of the animal for the purpose of relieving its distress if, (a) a veterinarian has advised the inspector in writing that relieving the animal's distress necessitates its removal; (b) the inspector has inspected the animal and has reasonable grounds for believing that, (i) the animal is in distress and the owner or custodian of the animal is not present and cannot be found promptly, or (ii) the animal is in critical distress; or (c) an order respecting the animal has been made under section 30 and the order has not been complied with. 2019, c. 13, s. 31 (1); 2023, c. 12, Sched. 6, s. 5 (1-3).

Seizure - 44 (1) - An animal welfare inspector who is lawfully in any place may, without a warrant, seize any animal or thing that he or she has reasonable grounds to believe, (a) has been obtained by the commission of an offence under this Act; (b) has been used in the commission of an offence under this Act; (c) will afford evidence of the commission of an offence under this Act; or (d) is intermixed with a thing referred to in clause (a), (b) or (c).

veterinary care) until it is either returned to its owner or is officially forfeited to the Crown. The length of these seizures can vary greatly from as little as a few days to as long as several years.

When an animal(s) is removed or seized, Animal Welfare Services does not become its legal owner. Instead, they become the primary custodian of the animal(s) and are solely responsible for all care decisions (though there is a process to seek cost recovery from the owner of the animal(s) for the care provided). As part of these custodial duties, Animal Welfare Services is permitted under Section 44 (3) of *PAWS*² to deliver an animal(s) to a person for safekeeping. This person does not have to be a veterinary professional and is often community and/or shelter partners that Animal Welfare Services works with, but does not directly employ, to safeguard animals. Often these animals are delivered to these partners after they have been seen by a veterinarian and are accompanied by a veterinary treatment plan for ongoing delivery of care which may include the ongoing performance of certain authorized activities such as administering substances, including drugs, by injection or inhalation.

This process would not currently be permitted to continue under the *VPA* as only members (veterinarians and veterinary technicians) are permitted to carry out authorized activities unless otherwise specifically excepted and exempted and the current statutory exemption in Section 2 of Schedule 1 would only be applicable if Animal Welfare Services was the legal owner of the animal(s) during the seizure period - which it is not.

Proposed Regulatory Exemption

In recognition of the importance of Animal Welfare Services being able to continue to deliver these public safety focused services, Transition Council is asked to consider the following proposed regulatory exemption that clarifies that Animal Welfare Services qualifies as the owner of the animal(s) under the noted statutory exception as long as:

1. The animal(s) has been removed or seized in accordance with the *PAWS Act*;
2. The animal(s) is under the care of a custodian approved by the Chief Animal Welfare Inspector or their delegate; and
3. The custodian adheres to the treatment plan as developed by the veterinarian member (including only administering drugs that have been prescribed by the veterinarian member for the specific animal(s).)

It is important to note that this proposed exemption would only apply to third-party non-member custodians and could not be utilized by members (veterinarians and veterinary technicians).

² **Safekeeping – 44 (3)** - An animal welfare inspector shall deliver any animal or thing that he or she seizes to a person authorized by the Chief Animal Welfare Inspector for safekeeping.

For more information on this proposed regulatory exemption, please refer to the draft concept chart attached to this cover sheet as Appendix A.

A Note on Consultation

In considering this proposed regulatory exemption it is important to note that additional public consultation by the College on this item would not be required for the following reasons:

1. The proposed exemption pertains to another legislation framework and is designed to continue to allow existing Ministerial programs to continue to operate; and
2. The proposed exemption would be included in Transition Council's larger regulatory concept submission to OMAFA and would be included in their larger review of the material (including the completion of their own public consultation).

Transition Council Discussion

The information contained in this cover sheet is being presented to Transition Council for its review and discussion related to next steps. To aid in this discussion, Transition Council is encouraged to consider if any further clarification or additional information is necessary prior to providing its direction.

Potential Direction

Based on this review and discussion, Transition Council may direct:

1. That the proposed regulatory exemption be approved for submission to OMAFA as presented or amended;
2. That the proposed regulatory exemption be returned to College staff for further work and consideration; or
3. Any other direction as determined by Transition Council.

Attachments

1. Appendix A – Concept Chart – Owners and Custodians under the *Provincial Animal Welfare Services Act*

Concept Chart – Owners and Custodians under the *Provincial Animal Welfare Services Act*

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
This column outlines the specific section of regulation.	This column provides a description of the objectives sought and the associated reasoning.	This column provides any additional specific information required to ensure clarity.	This column outlines when Transition Council confirmed the concept as well as any additional questions raised.
Regulatory Exemption for Non-Members – Owners and Custodians under the <i>Provincial Animal Welfare Services Act, 2019</i>	<p>General</p> <p>Section 2 of Schedule 1 of the <i>VPA</i> contains the following statutory exemption for non-members:</p> <p style="padding-left: 40px;">The administration of a treatment plan by a <u>custodian of an animal</u> if the treatment plan is <u>made by a veterinarian member</u> and carried out at the direction of <u>the owner</u>.</p> <p>Section 93 (1) 8 of the <i>Veterinary Professionals Act (VPA)</i> states that, subject to the approval of the Lieutenant Governor in Council, the Council may make regulations:</p> <p style="padding-left: 40px;">Prescribing exceptions for the purpose of Section 10 or 11 (of the <i>VPA</i>) or limiting or clarifying the exceptions set out in sections 2 and 3 of Schedule 1.</p>	<p>This process would not currently be permitted to continue under the <i>VPA</i> as only members (veterinarians and veterinary technicians) are permitted to carry out authorized activities unless otherwise specifically excepted and exempted.</p> <p>It is important to note that this proposed exemption would only apply to third-party non-member custodians and could not be utilized by members (veterinarians and veterinary technicians).</p>	Transition Council has not yet confirmed the regulatory concept.

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<p>Overview</p> <p>Conversations between the College and SOLGEN have identified a potential need to clarify the role and responsibilities that Animal Welfare Services and Animal Welfare Inspectors have over an animal(s) or group of animals when they are removed or seized in accordance with the <i>PAWS Act</i>. This person does not have to be a veterinary professional and is often community and/or shelter partners that Animal Welfare Services works with, but does not directly employ, to safeguard animals.</p> <p>When Animal Welfare Services takes custody of said animal(s), it is responsible for safeguarding the animal(s)' well-being (including providing any necessary veterinary care) until it is either returned to its owner or is officially forfeited to the Crown.</p> <p>When an animal(s) is seized, Animal Welfare Services does not become its legal owner. Instead, they become the primary custodian of the animal(s) and are solely responsible for all care decisions.</p> <p>Regulatory Exemption for Owners and Custodians under <i>PAWS</i>.</p> <p>In recognition of the importance of Animal Welfare Services being able to continue to deliver these public safety focused services, the following proposed regulatory exemption that clarifies that Animal Welfare Services qualifies as the owner</p>	<p>Additional public consultation by the College on this item would not be required for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposed exemption pertains to another legislation framework and is designed to continue to allow existing Ministerial programs to continue to operate; and 2. The proposed exemption would be included in Transition Council's larger regulatory concept submission to OMAFA and would be included in their larger review of the material (including the completion of their 	

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<p>of the animal(s) under the noted statutory exception as long as:</p> <ol style="list-style-type: none"> 1. The animal(s) has been removed or seized in accordance with the <i>PAWS Act</i>; 2. The animal(s) is under the care of a custodian approved by the Chief Animal Welfare Inspector or their delegate; and 3. The custodian adheres to the treatment plan as developed by the veterinarian member (including only administering drugs that have been prescribed by the veterinarian member for the specific animal(s).) 	<p>own public consultation).</p>	



AGENDA ITEM 7.5

TOPIC: Accreditation

Overview

Outlining the framework and expectations for facility accreditation allows for one of the fundamental roles of the College to be established and carried out. Sections 21 through 26 as well as several regulation-making authorities found in the *Veterinary Professionals Act, 2024* reflect the College's ongoing obligations in this area and the College seeks to modernize its approach in accordance with the new statutory framework.

Current Framework

Regulations for facility accreditation outlined in Regulation 1093 under the *Veterinarians Act* were last amended in 2022. These amendments were a first step towards the modernization of the profession and the intentions of these amendments have been set up to carry over closely into regulations under the *VPA*. The facility accreditation program is currently under the purview of the Legacy Council and associated Accreditation Committee.

What Will Change?

The introduction of the *Veterinary Professionals Act, 2024* does not necessitate many updates to the current provisions for facility accreditation found under the *Veterinarians Act*. However, there are a number of mainly administrative amendments that may further clarify the role of the program and assist with ensuring it is implemented smoothly. These are not substantive, but are meaningful to the interpretation and implementation of the regulations.

Concept

A draft concept has been developed to support the College's work in this area and to outline the specific supplementary components that are required in Regulation to ensure clear and defensible language related to facility accreditation that is focused on public protection. In particular, the concept speaks to the proposed inclusion of:

1. A formally recognized definition of "Holder of Certificate of Accreditation"

The concept proposes that Regulation language be developed that defines the "holder of certificate of accreditation" to provide more clarity that following application and issuance of the certificate, it is held by the facility director who made the application.



2. Proposed Ability to Grant Extensions in Writing

The concept proposes that Regulation language be developed to ensure unique situations where a facility director leaves the position do not lead to the unnecessary expiration of the certificate of accreditation. These scenarios do occur now and are not frequent. Allowing the Registrar to grant an extension in writing for a new facility director to be designated will support efficiency of process and allow for the continuance of the certificate of accreditation, limiting the disruption to providing care.

3. Clearly Requiring the Payment of Accreditation Fees

The concept proposes that Regulation language be developed that clearly requires the payment of accreditation fees as set out in the bylaws. This will allow for a greater understanding that should the fee not be paid, the certificate of accreditation will expire.

4. Carrying Over Language from Section 50 of Regulation 1093

The concept proposes that Regulation language be developed that contains all relevant sections in one location. Currently, regulatory language related to facility accreditation is found in two locations within Regulation 1093. These are sections 15-16 and section 50. Carrying over language from section 50 into the dedicated facility accreditation section will assist with transparency and clarity when interpreting and implementing the regulations.

Example Language

In effort of highlighting how few changes are being proposed, a draft version of potential facility accreditation regulation language developed by the College has been attached to this cover sheet as Appendix “A”.

This language is being shared with the Transition Council to help shape its understanding of the College’s proposed approach.

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 *Veterinary Professionals Act, 2024*. Development of this language will be the responsibility of the legislative drafters of the provincial government and will be overseen by the Ontario Ministry of Agriculture, Food and Agribusiness (OMAFRA).

Discussion

The draft concept and associated draft language related to facility accreditation is now being presented to Transition Council for its review and discussion related to next steps.



Options

Following discussion, Transition Council may elect to:

1. Direct that the draft concept be approved for submission to OMAFA as presented or amended;
2. Direct that the draft concept be returned to College Staff for further review and development; or
3. Other.

Attachments

1. Appendix A – Draft Version of Facility Accreditation Regulatory Language

FACILITY ACCREDITATION

DEFINITIONS

HOLDER OF CERTIFICATE OF ACCREDITATION MEANS THE VETERINARIAN MEMBER WHO HAS OBTAINED A CERTIFICATE OF ACCREDITATION THAT IS NOT EXPIRED OR REVOKED

10. (1) In order to obtain, maintain or renew a certificate of accreditation for a veterinary facility, other than a temporary facility, the owners of the veterinary facility or the partners in the practice conducted in or from the facility, as the case may be, shall designate a facility director. O. Reg. 260/22, s. 2.

(2) The facility director shall be responsible for the oversight of the veterinary facility, including ensuring that the facility is operated in accordance with the Act, the regulations and the standards established by the Council under section 8 of the Act. O. Reg. 260/22, s. 2.

(3) The facility director shall ensure that their name and contact information are clearly and publicly displayed at the veterinary facility. O. Reg. 260/22, s. 2.

(4) For greater certainty, despite the designation of a facility director, each member practising in or from a veterinary facility is responsible for meeting the requirements set out in the Act and the regulations and the standards established by the Council under section 8 of the Act. O. Reg. 260/22, s. 2.

11. (1) A certificate of accreditation for a veterinary facility, other than a temporary facility, shall not be issued or renewed unless the veterinary facility and the applicant meet the applicable requirements set out in the Act and the regulations and the standards established by the Council under section 8 of the Act. O. Reg. 260/22, s. 2.

(2) The following requirements apply with respect to an application for the issuance or renewal of a certificate of accreditation for a veterinary facility, other than a temporary facility:

1. The application shall be submitted by the facility director to the College.
2. The applicant shall submit the application on a form provided by the Registrar.
3. The applicant must,
 - i. hold a general or restricted licence the conditions of which are consistent with the conditions of the certificate of accreditation that is being sought, and
 - ii. be engaged in the practice of veterinary medicine conducted in or from the veterinary facility in respect of which the application is being made.
4. With respect to an application for a renewal of a certificate of accreditation, the applicant must be in compliance with any terms, conditions and limitations as specified by the Registrar on the existing certificate of accreditation.
5. The applicant shall pay the fees set out in the by-laws and shall not be in default of any fees.
6. The applicant shall provide, on a form provided by the Registrar, a written undertaking that the applicant will,
 - i. be responsible for the oversight of the facility, including ensuring that the facility is operated in accordance with the Act, the regulations and the standards established by the Council under section 8 of the Act, and
 - ii. ensure that only members will have responsibility for and control over all of the clinical and professional aspects of the provision of services through the facility, including maintaining the standards of practice of the profession.
7. If the facility director is not an owner of the veterinary facility or a partner in the practice conducted in or from the facility that is the subject of the application, the application shall include a written attestation from the owners or partners, as the case may be, that the facility director is authorized to be the facility director and is authorized to provide the undertaking required under paragraph 6. O. Reg. 260/22, s. 2.

11.1 REVOKED: O. Reg. 260/22, s. 2.

12. (1) A certificate of accreditation expires five years after it is issued or renewed unless,

- (a) it expires at an earlier date pursuant to subsection (2); or
- (b) the Registrar issues or renews the certificate on condition that it expire at an earlier date. O. Reg. 260/22, s. 2.

(2) Unless the Registrar has granted an extension in writing, Aa certificate of accreditation shall expire before the period described in subsection (1) if any of the following events occurs:

1. A veterinary facility, or a stationary element of a facility with a mobile element, is relocated.
2. The veterinary facility no longer has a facility director.
3. The veterinary facility no longer has any members who would meet the requirements in paragraph 3 of subsection 11 (2).
4. The veterinary facility no longer has any members who have made an undertaking that would satisfy the requirements set out in paragraph 6 of subsection 11 (2). O. Reg. 260/22, s. 2.

5. The facility director has failed to pay the fees set out in the bylaws.

13. The holder of a certificate of accreditation shall immediately notify the College, in writing, if any of the following events occur:

1. Any change to the name of the veterinary facility.
2. Any change in the type of species treated in or from the facility.
3. Any change in the scope of veterinary services offered in or from the facility.
4. The relocation of the veterinary facility or of a stationary element of a facility with a mobile element.
5. Any change in the identity of the facility director.
6. The facility no longer has any members who would satisfy the requirements set out in paragraph 3 of subsection 11 (2). O. Reg. 260/22, s. 2.

TEMPORARY FACILITIES

14. (1) A certificate of accreditation for a temporary facility shall not be issued unless the temporary facility and the applicant meet the applicable requirements set out in the Act and the regulations and the standards established by the Council under section 8 of the Act. O. Reg. 260/22, s. 2.

(2) The following requirements apply with respect to an application for a certificate of accreditation for a temporary facility:

1. The application shall be submitted by the applicant to the College.
2. The applicant shall submit the application on a form provided by the Registrar.
3. The applicant must,
 - i. hold a general or restricted licence the conditions of which are consistent with the conditions of the certificate of accreditation that is being sought, and
 - ii. be engaged in the practice of veterinary medicine conducted in or from the temporary facility. O. Reg. 260/22, s. 2.

CERTIFICATES OF ACCREDITATION

15. (1) A certificate of accreditation for a veterinary facility, including a temporary facility, issued by the Registrar must include the facility name, location, any terms, conditions or limitations and the date of expiry of the certificate. O. Reg. 260/22, s. 2.

(2) A certificate of accreditation for a veterinary facility, including a temporary facility, limits the veterinary practice in or from the facility to the veterinary services specified in the certificate and for the period of time specified in the certificate which, in the case of a temporary facility, shall be no longer than 30 days. O. Reg. 260/22, s. 2.

(3) The holder of a certificate of accreditation,

- (a) in the case of a veterinary facility other than a temporary or mobile facility, shall ensure that the certificate of accreditation is posted visibly in the veterinary facility; or
- (b) in the case of a temporary or a mobile facility, shall make the certificate of accreditation available to any person for review upon request. O. Reg. 260/22, s. 2.

(24) A holder of a certificate of accreditation who meets the requirements of section 11 is eligible for a renewal of the certificate if an application for the renewal is submitted not earlier than five months and not later than three months before the expiry of the certificate. R.R.O. 1990, Reg. 1093, s. 50 (2); O. Reg. 260/22, s. 7 (1).

(~~35~~) If an application for renewal is not submitted in the time specified under subsection (~~24~~) and the certificate of accreditation expires, the holder of the certificate must submit a new application. R.R.O. 1990, Reg. 1093, s. 50 (3).

(~~46~~) Upon receipt of an application for renewal, the Registrar shall promptly cause an inspection ~~under subsection (1) of the facility~~ to be carried out. R.R.O. 1990, Reg. 1093, s. 50 (4).

(~~57~~) If a holder of a certificate of accreditation applies in accordance with subsection (~~24~~), and the inspection does not occur one month or more before the expiry of the certificate of accreditation, the certificate of accreditation remains valid,

- (a) until the Registrar renews the certificate of accreditation; or
- (b) where the Registrar refuses to renew the certificate of accreditation, until the Accreditation Committee decides the disposition of the application. R.R.O. 1990, Reg. 1093, s. 50 (5).

(~~68~~) If a member applies for a certificate of accreditation and complies with section 11, the Registrar shall promptly cause an inspection to be carried out in order to determine if the veterinary facility meets the qualifications, requirements and applicable standards under the Act and the accreditation standards~~established under subsection 8 (1) of the Act~~. R.R.O. 1990, Reg. 1093, s. 50 (6); O. Reg. 260/22, s. 7 (2).

TRANSITION

15.1 (1) A certificate of accreditation that was in force immediately before the day this section comes into force is continued and is subject to the same terms, conditions and limitations that were in effect immediately before that day. O. Reg. 260/22, s. 2.

(2) For greater certainty, the continuation of the certificate of accreditation does not change the status of a hearing or review related to the certificate of accreditation, or any associated deadlines, if the hearing or review was commenced but not concluded before the day this section comes into force. O. Reg. 260/22, s. 2.

(3) A certificate of accreditation that is continued under subsection (1) shall expire in accordance with the rules that were in effect immediately before the day this section comes into force. O. Reg. 260/22, s. 2.

15.2 Despite section 11, an application for the issuance or renewal of a certificate of accreditation that was submitted before the day section 11 comes into force shall be determined in accordance with this Regulation as it read immediately before that day. O. Reg. 260/22, s. 2.



AGENDA ITEM 8.

TOPIC: Proposed Approach to Existing Standards and Policies

Overview

On June 13, 2025, Transition Council was presented with a proposed approach for streamlining the policy development process under the *Veterinary Professionals Act, 2024 (VPA)*.

Section 100(4) of the *Veterinary Professionals Act, 2024* grants the Transition Council the ability to pre-emptively make any standards required to support the implementation of a new statutory framework for the practice of veterinary medicine in Ontario.

This approach proposes to divide the work into three main streams: changes to overall approach or direction, minor changes, or rescinding. Each stream is described as:

1) Changes to Overall Approach or Direction

This stream is designed for existing College policies that have been flagged for potential substantial changes based on the regulatory concepts approved by Transition Council. It would also include any brand-new policies that may need to be developed to assist with the implantation of the new model established under the *VPA*. These policies would be reviewed by Transition Council individually across several meetings and would all be circulated for public consultation before potential approval.

2) Minor Changes/No Changes

This stream is intended to capture any policies requiring minor changes that would not commonly or historically require large review or public consultation. Qualities these policies may have to be considered for this stream would be changes to language related to the one profession, two professionals model (for example, clarifying what type of member is meant where) and/or policies needing updated references. This stream would also capture any policies that do not require immediate changes and would help facilitate a smooth transition upon full proclamation of the regulations. It is proposed that this stream be presented to Transition Council as an omnibus motion for approval, with Transition Council having the ability to remove any policy from the motion for further review if desired.

3) Rescinding

This stream is intended to capture any existing College policies that may need to be rescinded in entirety on the transition date. Examples of qualities these policies might have include policies with material that would be in direct conflict with the new model and policies in which their content is now or will be covered in the Act, Regulation, or a new policy. Given that all existing College policies are the work of Legacy Council, the list of policies for rescinding would be presented to Legacy Council for review and potential confirmation.

A flow chart has been developed to help illustrate the proposed approach for Transition Council and can be found attached to this cover sheet as Appendix A.

At the June meeting, Transition Council indicated its support for this process and directed College staff to continue working on the details of this work, including the sorting of existing College policies into each stream.

Summary of Work Since June 13, 2025

Review and Sorting of Existing Policies

Following the June 13, 2025, Transition Council meeting, College staff worked to develop a list of existing College policies for sorting into the approved streams of work. A list of these sorted policies is attached to this cover sheet as Appendix B.

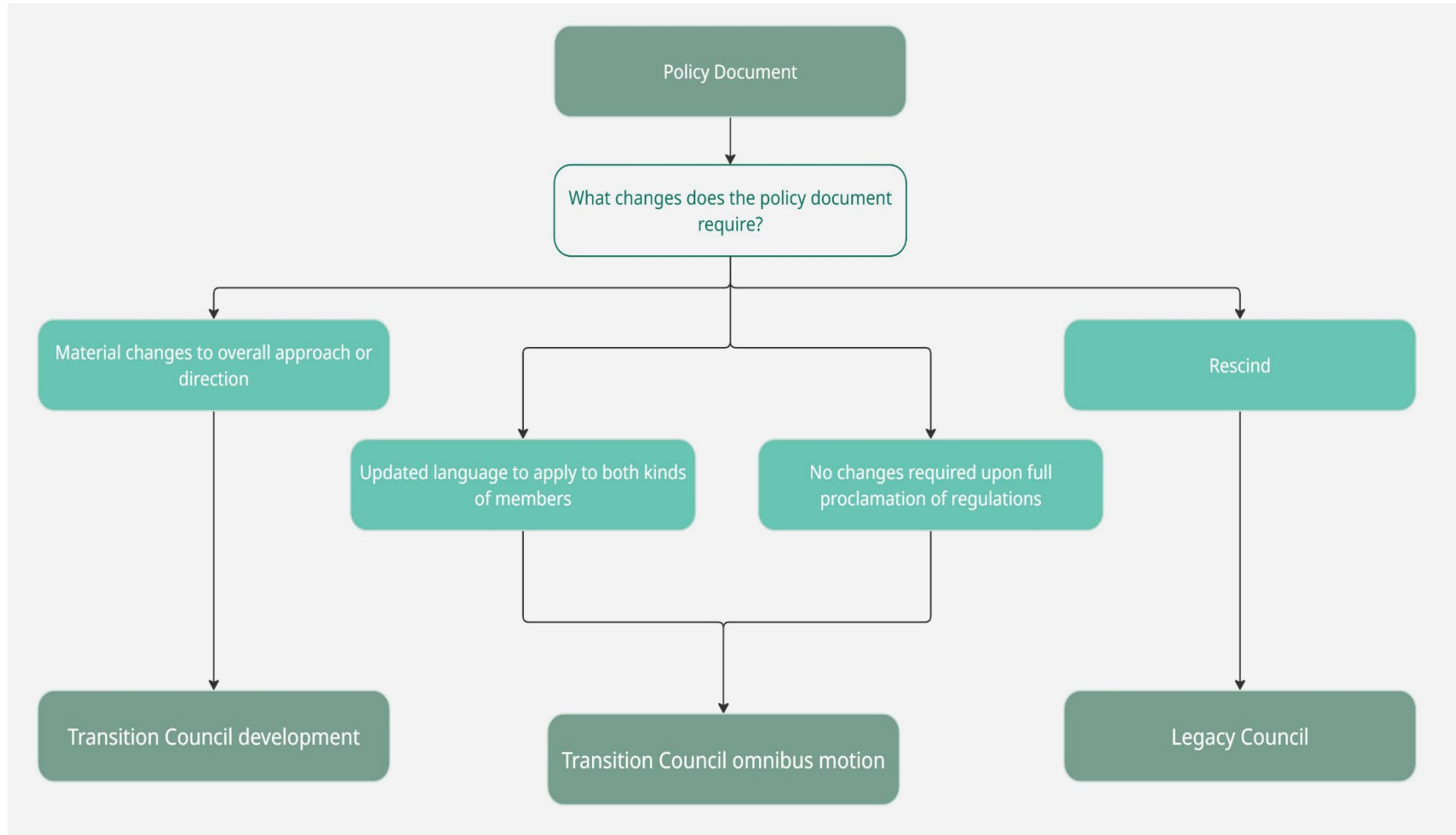
At the August 11, 2025, meeting, Transition Council is being asked to confirm the proposed list to support College staff in further developing materials on each policy for its future review and consideration.

Discussion

Transition Council is asked to review the information found in this cover sheet and to provide its feedback – including any questions or concerns - related to the proposed process.

Attachments

1. Appendix A – Flow Chart
2. Appendix B – List of Policies



Full Review and Development by Transition Council

Professional Practice Standards:

1. Delegation (likely to become Authorized Activities)
2. Informed Client Consent
3. Veterinary Dentistry
4. Veterinarian-Client-Patient Relationship
5. Conflicts of Interest in the Practice of Veterinary Medicine

Position Statements:

6. Unauthorized Practice

Policy Statements:

7. After Hours Care (potential to transition into a Professional Practice Standard)

Minor Amendments (clarifying which member, updating references, etc.) for Omnibus

Professional Practice Standards:

1. Prescribing a Drug
2. Use of Compounded Drugs in Veterinary Practice
3. Dispensing a Drug
4. Medical Records
5. Diagnostic Laboratory Testing
6. Management and Disposal of Controlled Drugs
7. Veterinary Euthanasia
8. Advertising
9. Telemedicine
10. Humane Animal Handling and Restraint
11. Extra Label Drug Use

Policy Statements:

- 12. Provision of Veterinary Services to Wildlife
- 13. Sale of Non-Drug Veterinary Products
- 14. Managing Questions of Ownership and Ownership Disputes of Companion Animals

Position Statements:

- 15. Reporting Animal Abuse or Neglect
- 16. Animal Welfare
- 17. Veterinary Stewardship of the Responsible Use of Antimicrobial Drugs in Animals
- 18. Steering
- 19. Bundled Services
- 20. Medically Unnecessary Veterinary Services
- 21. Pain Management

Rescind by Legacy Council

- 1. Use of Forms of Energy in the Treatment and/or Care of Animals Policy Statement
- 2. Use of Forms of Energy in the Treatment and/or Care of Animals Position Statement
- 3. Use of Non-Conventional Therapies in the Practice of Veterinary Medicine Position Statement



AGENDA ITEM 9.1

TOPIC: Updated Transition Council Workplan

Background

The Transition Council Workplan Timeline is designed to assist Council with keeping track of the work that is currently under its direction and serves as an overview of work completed and work in progress.

Attachments

- Transition Council Workplan Timeline

Transition Council Work Timeline

Current as of: July 23, 2025

September 2024 Meeting #1	September 2024 Meeting #2	October 2024	November 2024 (3 sessions)	December 2024
			<div>Session One</div> <div>Terms of Reference</div> <div>Authorized Activities pt.2</div>	
<div>Governance Framework</div> <div>Election of Chair</div>	<div>Concepts:</div> <div>Licensure</div> <div>Committees and Panels</div> <div>Conflict of Interest</div>	<div>Briefing on After-Hours Care</div>	<div>Session Two</div> <div>Authorized Activities pt.3</div>	<div>Concepts:</div> <div>After-Hours Care</div> <div>Regulatory Medicine</div> <div>Quality Assurance</div>
<div>Approve Key Concepts for Development</div> <div>Workplan Review</div>	<div>Introduction to Authorized Activities</div> <div>Professional Misconduct and Fines and Offences</div> <div>Terms of Reference</div>		<div>Session Three</div> <div>Authorized Activities - Revisiting:</div> <div>Mass culls</div> <div>Dental extractions</div> <div>Embryo implantation</div>	<div>VCPR/ICC</div> <div>RVT Businesses</div> <div>Acupuncture</div>

Green

 - Complete

Orange

 - In Progress/Returning consultation

Purple

 = Initiate consultation

Black

 = Upcoming Transition Council discussion and direction

Projected proclamation of the full Act - early 2026

VCPR - Veterinarian-Client-Patient Relationship

ICC - Informed Client Consent

January 2025 (2 sessions)	March 2025	May 2025	June 2025	August 2025	September 2025
<div>Session One</div> <div>Authorized Activities - Pharmacy</div> <div>Drugs</div> <div>Businesses continued</div>				<div>Continue approving concepts for submission to Ministry</div>	<div>By-laws approved for consultation</div>
	<div>Consultation Period (Closed April 16)</div>	<div>Review Consultation Feedback</div> <div>Begin approving concepts for submission to Ministry</div>	<div>By-laws discussion continued</div> <div>Standards identified for development pre-proclamation</div>	<div>- After-hours Veterinary Care</div> <div>- Regulatory Exemptions for Members</div> <div>- Chiropractors</div> <div>Review draft regulation concept submission to the Ministry</div> <div>By-laws discussion continued</div>	<div>Approach to Policies:</div> <div>Unauthorized Practice</div> <div>Veterinary Dentistry</div> <div>Authorized Activities</div>
<div>Session Two</div> <div>Full synthesis review of concepts</div> <div>Approval of concepts for consultation</div>	<div>Transition Council Retreat</div>				

December 2025	February 2026	March 2026	June 2026	September 2026
<div>Review consultaton feedback and approve by-laws</div>				
<div> <div>Approach to Policies:</div> <div>VCPR</div> <div>ICC</div> <div>After-hours Veterinary Care</div> <div>Conflicts of Interest</div> </div> <div> <div>Review Draft Policies:</div> <div>Unauthorized Practice</div> <div>Veterinary Dentistry</div> <div>Authorized Activities (1st review)</div> </div>	<div>Consider response to Ministry consultation on concepts</div>	<div>Review Draft Policies:</div> <div>VCPR</div> <div>ICC</div> <div>After-hours Veterinary Care</div> <div>Conflicts of Interest</div> <div>Authorized Activities (second review)</div>	<div>Review Draft Policies:</div> <div>Omnibus policies</div> <div>Any other Policy review to be determined</div>	<div>Review Draft Policies:</div> <div>Any other Policy review to be determined</div> <div><i>If regulation language is finalized, initiate consultation on approved policies</i></div>
<div>Considerations for Proclamation</div>				



AGENDA ITEM 9.2

TOPIC: Format for Regulatory Concept Submission to the Ministry

Overview

The *Veterinary Professionals Act, 2024* grants the Transition Council of the College of Veterinary Professionals of Ontario the ability to make any regulations required to support the implementation of a new statutory framework for the practice of veterinary medicine in Ontario. The development of these regulations remains subject to the approval of the Lieutenant Governor in Council and is supported and overseen by the Ministry of Agriculture, Food, and Agribusiness (OMAFRA). A visual of this process is found in Appendix A.

In developing these proposed regulations, Transition Council focused on the development of regulatory concepts – instead of specific regulatory language.

Work of Transition Council

Transition Council began reviewing a wide range of regulatory concept topics in September 2024, and continued discussions throughout the following months. Transition Council held seven (7) meetings in which it considered these regulatory concepts (both in full and in partial follow-ups). The discussions on regulatory concepts prior to consultation concluded at the January 29, 2025, meeting, and a public consultation was held from February 11 to April 16, 2025.

The review of consultation feedback and confirmation of regulatory concepts for submission to OMAFA began in May 2025, and is expected to conclude at the August 11, 2025 Transition Council meeting.

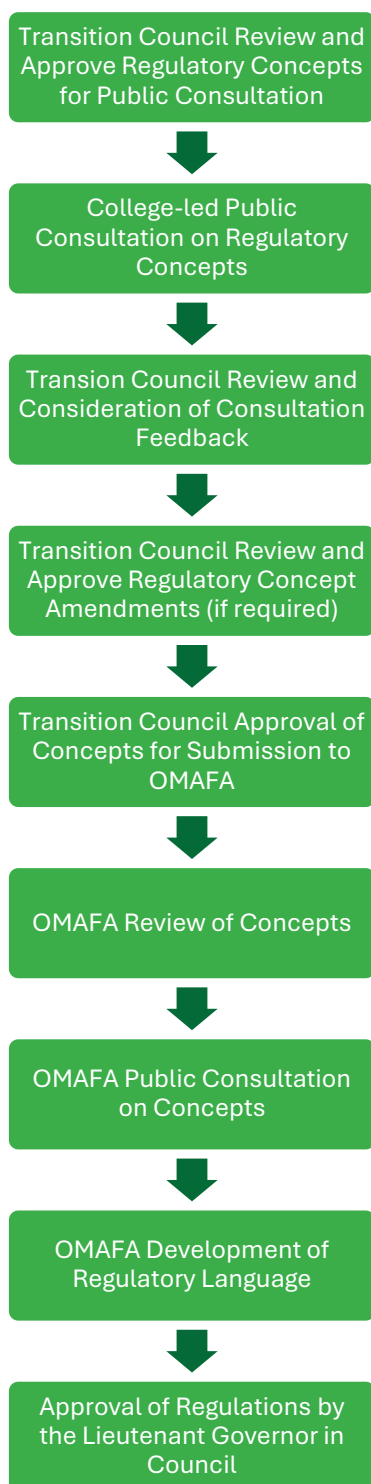
Following the completion of confirming the regulatory concepts for approval to OMAFA, College staff will develop a full Regulatory Concept Paper based on Transition Council's discussions and decisions. An example of the general format of this submission can be found in Appendix B. A detailed example of the content to be developed for each regulatory concept can be found in Appendix C. Following this development, the Paper will be shared with the Chair and Vice-Chair of Transition Council for confirmation before submitting it to the Minister.

Discussion

Transition Council is asked to review the information found in this cover sheet and to provide its feedback – including any questions or concerns - related to the proposed process for approval of the final Regulatory Concept Paper submission.

Attachments

1. Appendix A – Regulatory Concept Process
2. Appendix B – Example Regulatory Concept Paper – General Format
3. Appendix C – Example Regulatory Concept Paper – Concept Details



Proposed Regulatory Concepts

Supporting the Implementation of the *Veterinary Professionals Act, 2024*

Submitted by: Transition Council of the *Veterinary Professionals Act, 2024*

Submitted to: Hon. Minister of Agriculture, Food, and Agribusiness

XXXX, 2025



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**Example Layout for Regulatory Concepts Paper – Individual Concepts (Example:
Licensure Concepts)**

Category Layout – Licensure

Title

Part A – Licensure

Overview

Concept Layout – Licensure – Licensure

Summary of Concept

Overview

Note on Approach

Transition Council Approval

Concept Layout – Licensure – Professional Misconduct

Summary of Concept

Overview

Note on Approach

Transition Council Approval

Concept Layout – Licensure – Conflict of Interest

Summary of Concept

Overview

Note on Approach

Transition Council Approval



AGENDA ITEM 10.1

TOPIC: By-Law Concepts: Election of Council Members

Background

Veterinarian and veterinary technician members who wish to serve on Council under the new *Veterinary Professionals Act* (VPA) will generally be elected to the Council. The exception is academic members representing veterinarian and veterinary technician education programs who will be appointed. Public members of Council will continue to be appointed by the Ontario government.

The VPA provides a range of number of Council members and in a March 2025 retreat, the Transition Council had discussed a preference for the Council to consist of ten elected veterinarian members, five elected veterinary technician members, six-eight public members appointed by the Lieutenant Governor in Council, one veterinary technician member who is a faculty member of an Ontario education program and one veterinarian member who is a faculty member of a veterinarian education program. The Transition Council discussed the modernization of regulatory boards and the trend towards smaller sizes. While the new Council will not be smaller, the Transition Council discussed a preference for maintaining a smaller Council where possible (to support good governance and reduce costs) while maximizing the diversity of voices contributing to the discussion which had guided thoughts on staying at the lower end of the allowable range of veterinarian members and the higher end of veterinary technician members.

The By-Laws for the new College will need to define how veterinarians and veterinary technicians are elected to Council. The VPA provides that:

98. (1) The Council may make by-laws relating to the administrative and internal affairs of the College not inconsistent with this Act and the regulations, including by-laws respecting the following matters:

25. Respecting and governing the qualifications, nomination, election and term or terms of office of the members to be elected to the Council, and disputed elections.



Discussion

The College of Veterinarians of Ontario currently uses an election process based upon geographical districts. The province is divided into twelve districts and a veterinarian from each district is elected to serve on Council by those licensed members within each district. Electoral districts based on geography has been very common for decades and traditionally came out of the fact that regulatory bodies were often transitioning away from being professional associations. More modern approaches to these Council or Board positions have been used by regulators in the last few years. The most common approach for new regulators or those making changes is a competency and attribute-based electoral process. This generally means there are no longer districts from which members are elected. There are a defined number of Council positions and each individual that stands for election is assessed against the list of competencies and attributes to ensure that the Council as a whole meets the desired list of competencies and attributes. Council considers a broad range of issues and must make decisions in the public interest. Ideally, the Council will represent a diverse group of perspectives and bring different competencies and attributes that complement one another.

The move towards competency-based Councils has included a corresponding move away from electoral districts based on geography among regulatory bodies. Although geographic distribution may be an important consideration, it is not the only consideration that most regulators are currently using. The Ontario College of Pharmacists (OCP) moved away from electoral districts in 2020. OCP implemented a competency-based process in order to reflect experience working with various patient populations, such as acute, urban, rural, northern and Indigenous; demonstration of serving the populations represented; and those running for election are encouraged to have prior experience as a non-Council Committee member.

In June 2022, The College of Dietitians of Ontario (CDO) approved a governance modernization framework. In June 2023, CDO adopted a single electoral district that moved away from a number of districts based on geography. This was to allow a focus on diversity in a variety of areas. The CDO also adopted a competency and attribute framework as election eligibility criteria.

The *Veterinary Professionals Act* provides for five Council seats for veterinary technicians. Our traditional approach of twelve geographical districts does not easily work for veterinary technicians and supports the need to consider a new approach.



Legacy Council had contemplated moving to a competency-based Council when it completed a Governance Modernization Review in 2022 but chose not to make changes at that time due to the fact that the College was moving towards new legislation.

Competencies and Attributes for Consideration

The competency and attribute frameworks previously considered by the Legacy Council and those used by other regulators suggested inclusion of the following:

- Specific skills that all members of Council should possess (e.g. ability to commit the necessary time, effective communicator, commitment to public interest mandate, collaborative, ethical/honest/acts with integrity)
- Specific competencies that some members should possess (e.g. financial knowledge, risk management, strategic thinking, building external relationships, governance experience)
- Council as a whole should possess professional experience related to understanding systems-level trends in veterinary medicine, familiarity with One Health and animal welfare concepts and initiatives
- Council should have individuals with a history of working with different patient/client populations (small animal, production animal, equine, regulatory medicine), and representation from Northern Ontario, rural or remote practitioners
- Diversity of people, which can include race, abilities, ethno-cultural backgrounds, gender, Indigenous Peoples, place of education, etc.
- Experience on College Committees is valuable

Inclusion of a Nominating Committee, which Transition Council directed at the June Transition Council meeting, will ensure that those running for election meet the desired competencies of Council.

Mandatory Competencies and Attributes

If Council moves away from districts, there is still the ability to designate Council positions for specific competencies or attributes that Transition Council feels are necessary in order to function as a Council. For example, there could be a specific Council position that requires a production animal veterinarian, or an Indigenous veterinarian, or a veterinarian who works in Northern Ontario to fill that Council position.



Voting

In consideration of the new College and the increased focus on teams, there is an opportunity to remove the barriers we previously had where individuals are only voting for those in their own district. Council members do not represent the interests of those in their district; they represent the public interest.

Moving away from electoral districts allows for all licensed members to vote for all open Council positions. There seems to be no reason to have veterinarians only vote for veterinarians and technicians only vote for technicians given that all elected positions represent the public. This allows for enhanced engagement in the election of Council members as there will be elections held each year instead of an individual only getting the opportunity to run for Council or vote within their own district every three years.

Questions for Consideration:

- Does Transition Council prefer to remain with elections based on geographical districts or is there support to move to competency and attribute-based Council positions?

If there is a preference for competency and attribute-based Council elections:

- Does Transition Council support the list of proposed competencies and attributes? Are there additional considerations?
- Are there any mandatory competencies or attributes which should be designated as a Council position to ensure they are represented at the Council table?
- Does Transition Council support the move to allow all licensed members to vote for all open Council positions?



AGENDA ITEM 10.2

TOPIC: By-Law Concepts: Public Register

Background

The College maintains a register of information about licensed members and accredited facilities. A subset of the information on the register is designated as public information. This public register ensures that the College has relevant information about those that are regulated and provides information that the public relies upon to make care provider decisions.

The *Veterinary Professionals Act*, section 82, designates specific information to be on the register and made available to the public (see Appendix 1). Section 82 (3) indicates that the public register is to be maintained electronically and posted to the College's website.

Section 98 of the *VPA* provides the authority to require any other additional information be present on the public register that Council decides to include in a By-Law.

By-laws

98 (1) The Council may make by-laws relating to the administrative and internal affairs of the College not inconsistent with this Act and the regulations, including by-laws respecting the following matters:

29. Respecting information to be included on any register created under this Act and respecting whether and when information on the register can be removed from the Register.

There is public scrutiny about what information a regulator provides on its public register and recent media articles ([a recent example related to the Law Society](#)) suggest that the public expects fulsome information about the conduct of regulated professionals. Professional members of regulators have traditionally argued that too much publicly available information violates their privacy. In an increasingly digital world, most information is now available on the internet. A regulator's role in public protection causes us to think about what information is needed to be displayed in a public register to maintain the public interest and trust.



Discussion

In addition to the requirements outlined in the *VPA*, Transition Council is asked to consider other areas which it may choose to include in the By-Laws related to the public register to enhance transparency for members of the public. The existing requirements in regulation 1093 are proposed to be continued (see Appendix 2) and there are a number of other areas for consideration by Transition Council.

Cautions and Specified Continuing Education or Remedial Programs (SCERPS)

Section 23 of Schedule 2 of the *Regulated Health Professions Act (RHPA)* requires that a notation of every caution that a member has received from the Inquiries, Complaints and Reports Committee and any specified continuing education or remedial programs (SCERPS) required by a panel are to be noted on the register.

Cautions and SCERPS are intended to be remedial to address practice deficiencies. The College does not currently post cautions of the Complaints Committee or Executive Committee. Licensed members will likely argue that public register notations are seen to be punitive and that including this information on the public register is contrary to the purpose of remediation which is to support practice improvement. The public has generally felt that this information is relevant to consumer choice and that if there has been concerns about practice identified the public has a right to know.

Findings of Professional Negligence or Malpractice

Section 23. (2) 12. of the RHPA Health Professions Procedural Code requires regulators to post every finding of professional negligence or malpractice, which may or may not relate to the member's suitability to practice unless the finding is reversed on appeal. These findings would be made in civil lawsuits and hold the individual accountable for negligence or malpractice. Transition Council is asked to consider whether this information is relevant for the public when choosing a care provider.



Criminal Charges, Findings and Conditions of Release

Health regulators in Ontario are required to post any charges or findings under the Criminal Code (Canada) or the Controlled Drugs and Substances Act (Canada) on the public register including:

- the fact and content of the charge
- the date and place of the charge
- a summary of the finding
- a brief summary of the sentence
- any conditions for release following a charge
- a notation if the matter is under appeal

The VPA and our proposed regulation related to prescribed offences outline the charges and findings which a licensed member must self-report to the College and includes:

- 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 Conversation 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.

Information about charges and findings, especially related to Criminal Code offences, is often publicly available through the media or other means. The College has in the past received inquiries about why information about charges or findings that are available through other means are not reflected on the public register. Some of this information may impact the public's decision making on provider choice, however, some of the above information may be more relevant to the College's decision making related to



licensure, investigations, or the issuance of accreditation certificates, especially related to mobiles. If Transition Council supports the addition of any of this information to the public register, perhaps it is most appropriate to mirror the RHPA and include *Criminal Code* (Canada) and the *Controlled Drugs and Substances Act* (Canada) charges and findings on the public register. For the remaining offences that will be reported to the College, the Investigations & Resolutions Committee will review these reports, and the most serious matters would be referred to discipline. Discipline matters would be added to the public register through the existing VPA requirements which would have included a screening committee risk assessment and formal discipline referral process.

Registration/Licensure in Another Jurisdiction

Many regulators collect and provide information about registration or licensure in another jurisdiction. This is to provide transparency about the current practice of the professional. Most regulators provide public lists of licensed members, so this information is generally publicly available on other websites.

Disciplinary Finding by Another Regulator

Under Ontario Regulation 261/18, health regulators in Ontario are required to post information if the registrant/licensed member has been the subject of a disciplinary finding or a finding of professional misconduct or incompetence by another regulator or licensing authority in any jurisdiction. This provides transparency about the fulsome regulatory conduct of the licensed member. Regulated professionals do occasionally change jurisdictions to avoid the public nature of a disciplinary finding. Information about findings is usually available on the website of the regulator that made the finding. The public generally supports a regulator providing this information all in one location.

Ownership of Accredited Facility

There has been some discussion that members of the public want to better understand who owns each veterinary facility. At this time, the College does not collect information about who owns an accredited facility. The media has in the past drawn attention to the



fact that veterinary regulators may not collect this information and some members of the public may feel like ownership is important in their choice of care providers.

Licence Numbers

As increasing numbers of clients receive prescriptions to have their drugs dispensed at pharmacies, Transition Council is asked to consider whether it is important to make licence numbers publicly available. Registration numbers for health providers in Ontario have been publicly available for many years to assist pharmacists in confirming the registration/licensure of the prescriber. Pharmacists are required to confirm the authenticity of the prescriber by confirming the registration/licence number. At this time, pharmacists contact the College directly to verify the veterinarian prescriber. This verification process can slow down the time it takes the clients to get access to medications and as the volume of prescriptions written increases it significantly increases the administrative resources that the College must put towards confirming licence numbers.

College staff spoke with other regulators in Ontario and they did not report higher levels of fraud than we have traditionally seen related to inappropriate use of registration/licence numbers for prescribing.

Licence numbers can also assist the public in verifying the identity and register information of their veterinary care providers when the names of licensed members may be similar.

Questions for Consideration:

- Would Transition Council like to include any of the above areas in our By-Laws as information that would be available on the College's public register?
- Are there other areas not listed above that should be considered for inclusion on the public register?



Appendix 1: *Veterinary Professionals Act*

Registers

82 (1) The Registrar shall maintain one or more registers which shall include,

- (a) the name of every person to whom a licence is issued and the class of licence issued;
- (b) any designation of a member of the College as a specialist and any withdrawal of recognition by the College of the specialist status of a member or former member;
- (c) any terms, conditions or limitations imposed on a licence;
- (d) any revocation, suspension or cancellation of a licence;
- (e) the fact and amount of any fine imposed by the Discipline and Fitness to Practise Committee and the fact of any reprimand by the Committee, unless the Committee directs that no entry be made;
- (f) where an entry results from a decision of a committee, the name of the committee that made the decision and any finding of the committee resulting in the entry;
- (g) information that a member of the College consents to be entered in a register;
- (h) the date of the decision or order that results in an entry under this subsection;
- (i) any notice of accreditation hearings and related allegations under section 26;
- (j) any notices of discipline hearings and related allegations, which shall be entered before the holding of the hearing;
- (k) a copy of the specified allegations against a member or former member for every matter related to professional misconduct or incompetence that has been referred by the Investigations and Resolutions Committee to the Discipline and Fitness to Practise Committee under subsection 49 (5) and that has not been finally resolved;



- (l) information that the Licensing Committee or Discipline and Fitness to Practise Committee specifies shall be included;
- (m) if findings of the Discipline and Fitness to Practise Committee are appealed, a notation that they are under appeal, which shall be included until the appeal is finally disposed of;
- (n) a notation and synopsis of any acknowledgements and undertakings in relation to matters involving allegations of professional misconduct or incompetence before the Investigations and Resolutions Committee or the Discipline and Fitness to Practise Committee that a member has entered into with the College and that are in effect;
- (o) with respect to a certificate of accreditation issued by the Registrar,
 - (i) the name of any person who holds the certificate of accreditation,
 - (ii) the location and class of a veterinary facility for which the certificate of accreditation is issued,
 - (iii) any terms, conditions or limitations attached to the certificate of accreditation,
 - (iv) the date of expiry of the certificate of accreditation, and
 - (v) any revocation, suspension or cancellation of the certificate of accreditation;
- (p) professional corporations that have been issued a certificate of authorization;
and
- (q) any other information authorized or required to be entered by the regulations or by-laws.



Appendix 2: Regulation 1093

52. (1) The Registrar shall enter in the register the following information for each member:

1. The name of the member, and if the member has changed his or her name, any past names used by the member since beginning to practise veterinary medicine.
2. The university and year of graduation of the member.
3. The year the member joined the College.
4. The member's principal place of practice or residence.
5. The address of the member's principal place of practice or, if none, a current address for contacting the member.
6. The member's business telephone number, if there is one.
7. The member's professional activity.
8. The member's employment function and type of employment.
9. The language or languages in which the member can offer professional services.
10. The class of licence held by the member.
11. The conditions and limitations imposed on the member's licence.
12. A notation of every decision or sanction imposed on the member's licence. O. Reg. 398/07, s. 20; O. Reg. 233/15, s. 31 (1).



AGENDA ITEM 10.3

TOPIC: By-Law Concepts: Professional Liability Insurance

Background

Professional liability insurance offers coverage for errors, omissions, and negligent acts that are committed by a professional. *The Veterinary Professionals Act* provides the authority to make By-Laws to establish requirements for licensed members to maintain professional liability insurance.

By-laws

98 (1) The Council may make by-laws relating to the administrative and internal affairs of the College not inconsistent with this Act and the regulations, including by-laws respecting the following matters:

28. Establishing requirements for maintenance of professional liability insurance coverage for members and former members.

At its June 2025 Council meeting, the Transition Council provided direction to include a requirement for licensed members to hold professional liability insurance in the By-Laws. It was felt that the addition of the requirement for professional liability insurance is in the public interest.

Discussion

In order to place the requirement related to professional liability insurance in the By-Law, the Transition Council must define any specific requirements related to the insurance policies that must be met. There are a few areas in which staff is seeking direction outlined below.

Amount of Coverage

The insurance coverage provided by both the Ontario Veterinary Medical Association (OVMA) and the Ontario Association of Veterinary Technicians (OAVT) offers coverage of \$2 million. This \$2 million of coverage is per occurrence and per aggregate limit.

It is less relevant to consider the coverage amounts for other professions when setting appropriate coverage amounts for veterinarians. Different professions will have different



risk profiles. The fact that the OVMA and OAVT coverage amounts are the same suggests that the industry standard for veterinary medicine in Ontario is \$2 million of coverage.

Question for Consideration:

- Is Transition Council comfortable setting a per occurrence and aggregate limit of a minimum of \$2 million of coverage?

Deductible

A deductible is the amount of money the insured party must pay before the insurance policy covers any claims. Some regulators place requirements related to the cost of deductibles to ensure that coverage is still accessible even if the professional is in a dire economic position.

The OAVT insurance coverage does not have a deductible and the OVMA insurance coverage includes a \$1,000 deductible.

Question for Consideration:

- Does the Transition Council want to include any requirements related to deductibles?

Tail Insurance or Extended Coverage

Insurance policies can be claims-made or occurrence-based. Claims-made policies provide coverage for claims that arise during the policy's active period regardless of when the incident took place. If a claim arises after the policy expires it is not covered unless tail insurance or extended coverage is purchased. Occurrence-based policies provide coverage for incidents that happen during the policy period regardless of when the claim is reported.

The OAVT policy provides for a one-year extended reporting period. The OVMA policy is occurrence-based and therefore provides coverage for the policy period regardless of when the claim arises.

Regulators often require tail insurance if the insurance coverage is not an occurrence-based policy. This requirement becomes relevant when a veterinarian or veterinary



technician discontinues their licensure due to a leave of absence, retirement, etc. and no longer continues to hold a current insurance policy.

Question for Consideration:

- Does the Transition Council want to ensure insurance coverage continues for a minimum period of time after the policy is completed?

Individual coverage vs employer provided coverage

Transition Council is asked to consider whether they wish to make a requirement about whether the licensed member is required to hold their own insurance or whether an employer policy is sufficient.

There is a risk of an employer sponsored liability insurance declining to provide coverage if they deem the individual acted negligently or failed to adhere to another requirement within the employment site. The employer's interests may not always align with the professionals' or the public interest. Individualized insurance protects both the public and the veterinarian or veterinary technician by ensuring that coverage is available when needed. Requiring the licensed member to hold their own insurance allows the veterinarian or veterinary technician to ensure that the coverage meets the requirements for which they are accountable. The downside to requiring individualized insurance is cost to licensed members. Members of OAVT have professional liability insurance included as part of their association fees. OVMA members pay extra for their insurance coverage. Individualized professional liability insurance can also be purchased from other insurance providers.

Question for Consideration:

- Does the Transition Council wish to require that licensed members hold their own insurance coverage or are employer policies sufficient as long as they meet the requirements laid out in the By-Laws?

COVER SHEET
Transition Council Meeting
August 11, 2025



AGENDA ITEM 11.

TOPIC: Confidentiality

Councillors are reminded that Council meetings are public meetings.

Information discussed in in-camera sessions must be kept confidential by all in attendance. All budget/financial/strategic alignment documents are not to be shared outside of the meeting as these documents are working documents of Council and not public material. Any inquiries regarding the package can be directed to the website where the public package is posted.

Minutes of the Council meeting are not approved until its next meeting.