



AGENDA ITEM 9.4

TOPIC: **Initiate**

History of Topic

General Information

The *Veterinary Professionals Act, 2024 (VPA)* provides the legislative framework for an authorized activity model for the practice of veterinary medicine in Ontario. This framework moves away from an exclusive scope of practice in favour of a more prescribed approach to practice for veterinarians, veterinary technicians, and auxiliaries that clearly outlines the types of activities that can be performed by members as well those working under their supervision and delegation where applicable.

This cover sheet outlines Transition Council's work related to one aspect of this authorized activity model – initiation.

Legislative Framework

Section 9 of the *VPA* allows for the development of regulation that outlines the ways in which both members and non-members are permitted to perform authorized activities.

Section 9 (2) states that a member (either veterinarian or veterinary technician) may only carry out an authorized activity while engaged in the practice of veterinary medicine and subject to any prescribed conditions or prohibitions and any terms, conditions or limitations imposed on their licence.

Section 9 (3) states that a person who is not a member may carry out an authorized activity if it is delegated to that person by a member.

Schedule One of the *VPA* contains a list of seventeen (17) authorized activities can only be performed by members or by non-members to whom the activity is delegated or who are otherwise specifically authorized by the *VPA*.

Development of Regulatory Concept by Transition Council

Transition Council reviewed and forwarded for public consultation a regulatory concept related to initiation in January 2025. This concept included:

1. Definition of Initiation

Transition Council proposed the development of regulation language that includes a definition of initiation to help illustrate the process and its intended incomes.

Suggested Definition
Initiation: Means where a veterinary technician member is permitted to independently perform authorized activities without an order or delegation by a veterinarian member pursuant to the conditions set out in this Regulation.

2. Ability to Initiate Both Within and Outside of a Veterinarian-Client-Patient Relationship (VCPR)

Transition Council proposed the development of regulation language related to the authorized activity model to include the ability for a veterinary technician member to perform specific authorized activities both within and outside of a VCPR.

For the latter, Transition Council proposed that a veterinary technician member be able to initiate authorized activities proposed outside of a VCPR in recognition of the emergent nature in which these activities would likely be performed. The ability for a member to provide veterinary care outside of a VCPR in emergency situations is already outlined in Section 18 of Regulation 1093 and is likely to continue under the new regulatory framework. Given this, Transition Council recommended that a regulatory concept related to the authorized activity model clearly state that the initiation of authorized activities by veterinary technician members is also permissible in these circumstances.

3. Ongoing Expectations for Informed Client Consent

Transition Council proposed the development of regulation language that requires a veterinary technician member to still obtain informed client consent before proceeding with performing authorized activities under initiation regardless of whether a VCPR has been established.

4. Further Parameters Around When Veterinary Technician Members are Permitted to Perform Authorized Activities Through Initiation

Transition Council proposed the development of regulation language that outlines several overarching components that are required to be met for a veterinary technician member to initiate authorized activities. These include:

- That the veterinary technician member has the knowledge, skills and judgement to perform the authorized activity safely, effectively and ethically;

- That the veterinary technician member determines that the animal(s) or group of animals' veterinary care needs warrant the performance of the authorized activity, having considered:
 - The known risks and benefits to the animal of performing the authorized activity;
 - The predictability of the outcome of performing the authorized activity; and
 - The safeguards and resources available in the circumstances to safely manage the outcome of performing the authorized activity;
- That the veterinary technician member is accountable for determining that the animal's condition warrants performance of the authorized activity;
- That the veterinary technician member is accountable for the performance of the authorized activity; and
- The veterinary technician member coordinates care of the animal with a veterinarian member at the earliest opportunity.

Veterinary technician members would be permitted to initiate certain authorized activities (or components of) if they are practising in accordance with the regulation and from an accredited facility where the Veterinary Facility Director has permitted the initiation of the permitted authorized activities by veterinary technician members.

5. Authorized Activities Permitted to be Performed by Veterinary Technician Members Through Initiation

Transition Council proposed the development of regulation language related to the authorized activity model to outline the authorized activities (or components of) that are permitted to be initiated by veterinary technician members.

This proposed list was developed with the following lens:

- Facilitating timely access to needed veterinary services;
- Supporting team-based approaches to the delivery of veterinary care; and
- Encouraging full utilization of all available skillsets within the one profession, two professionals model.

The proposed list was also informed and guided by the core competencies developed by the Ontario Association of Veterinary Technicians that outline the skills that all veterinary technicians should possess upon completion of their education and training.

Transition Council proposed the development of regulation language that outlines the following authorized activities (or components of) be permitted to be initiated by a veterinary technician member:

Authorized Activity	Reasoning
Communicating to an individual the death of an animal(s) or group of animals.	Veterinary technicians are often involved in the triaging of animals, especially in emergency situations. In these circumstances, there may arise situations where a veterinary technician member may be presented with an animal(s) or group of animals where it is clear that death has occurred. As death is considered a diagnosis, it is proposed that veterinary technician members be permitted to communicate this diagnosis to assist in managing client expectations related to care options.
<p>Ordering the following laboratory tests on an animal or on specimens taken from an animal:</p> <ul style="list-style-type: none"> • Preliminary Hematology • Preliminary Urinalysis • Preliminary Cytology • Preliminary Serology • Preliminary Parasitology 	<p>The gathering of information from the results of laboratory tests can play an essential role in a veterinarian member's development of a diagnosis and subsequent treatment plan.</p> <p>Permitting veterinary technician members to begin this process by ordering preliminary tests will help to facilitate the timely collection of this information.</p> <p>Veterinarian members will remain responsible for interpreting the results of these tests and for the development of a diagnosis and/or treatment plan based on the findings.</p>
<p>Performing a procedure below the dermis for the purpose of:</p> <ul style="list-style-type: none"> • Taking a blood sample • Taking a punch biopsy • Taking a skin scrape • Cystocentesis • Fine needle aspiration • Placing an IV catheter 	<p>The following list of activities has been developed to facilitate the performance of the laboratory tests mentioned above.</p> <p>The placing of an IV catheter has also been included to allow for a veterinary technician member to prepare an animal in advance of further examination and/or treatment by a veterinarian member.</p>
With respect to the care of a wound below the dermis or below a mucous membrane, any of the following procedures:	This allowance has been designed to permit a veterinary technician member to begin to provide care to an animal in advance of

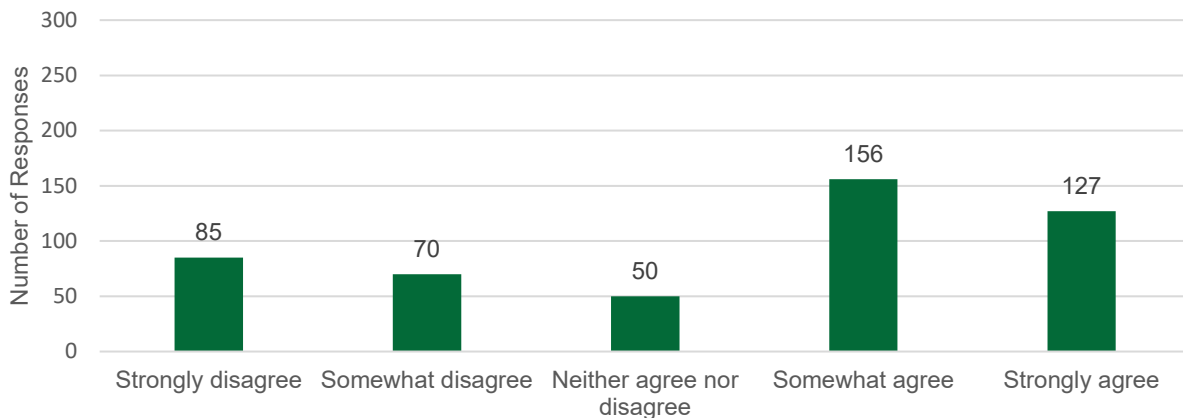
<ul style="list-style-type: none"> • Cleansing • Probing • Compressing • Dressing 	further examination and or treatment by a veterinarian member.
<p>Putting an instrument, arm, hand, or finger:</p> <ul style="list-style-type: none"> • Beyond the larynx to place esophageal or endotracheal tubing • Beyond the opening of the urethra to place a urinary catheter • Beyond the point of the animal's nasal passage where they normally narrow to collect a swab sample or place nasogastric tubing • Beyond the labia majora to conduct a vaginal or cervical exam or collect a swab sample • Beyond the anus or cloaca to check an animal's temperature • Beyond the anus to perform internal anal gland expression 	<p>The following lists of activities has been developed for the following reasons:</p> <ul style="list-style-type: none"> • To facilitate the performance of the laboratory tests mentioned above; • To allow for a veterinary technician member to prepare an animal in advance of further examination and/or treatment by a veterinarian member; and/or • To allow for a veterinary technician member to conduct a clinical assessment to assist the veterinarian member in the development of a diagnosis and/or treatment plan.
<p>Immobilizing a fracture of a bone or a dislocation of a joint or severed tendon for the purpose of temporary stabilization.</p>	<p>This allowance has been designed to permit a veterinary technician member to begin to provide care to an animal in advance of further examination and or treatment by (or under the order or delegation of) a veterinarian member.</p>
<p>Administering a substance by inhalation for the purpose of administering oxygen.</p> <p>Administering a substance by injection for the purpose of fluid therapy as long as said substance is not a drug.</p>	<p>These allowances have been designed to permit a veterinary technician member to begin to provide care to an animal in advance of further examination and or treatment by a veterinarian member.</p>

General Consultation Feedback

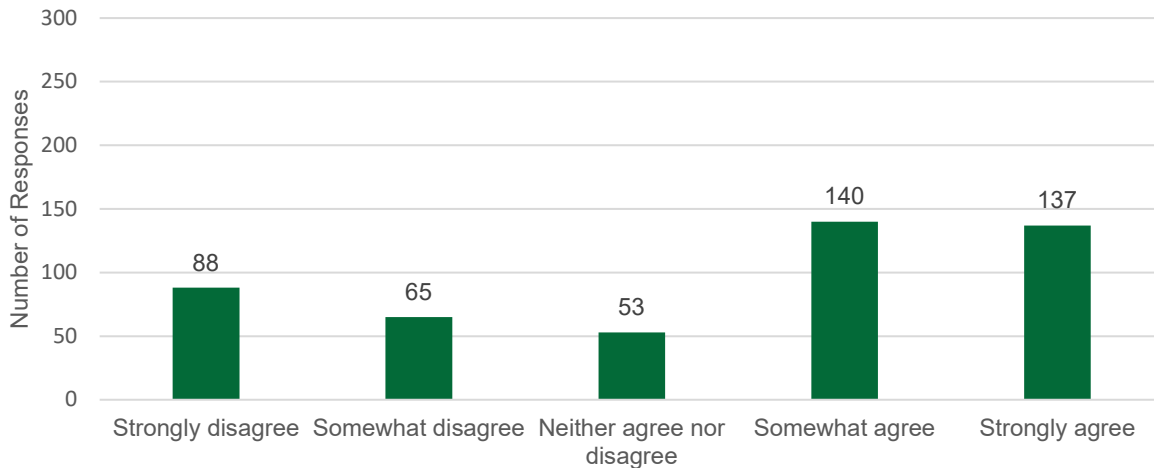
A regulatory concept related to initiation was included in the list of regulatory concepts that were circulated for public consultation from February 11 to April 16, 2025.

The following quantitative responses were received related to initiation:

Survey respondents were asked to indicate their agreement with two statements about Initiation on a Likert scale of responses from “Strongly disagree” to “Strongly agree”. The figure below presents the results of 488 responses to the statement “*The proposed model for initiation is appropriate.*”.



The figure below presents the results of 483 responses to the statement “*The proposed safeguards related to veterinary technicians performing authorized activities through an initiation process (only through accredited veterinary facility and where approved by the facility director) are adequate to protect the public.*”.



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

- Suggestions for some activities to be removed from the list of permitted activities under initiation:
 - o Punch biopsy
 - o Cystocenteses
 - o Fracture Stabilization; and
 - o Fluid therapy; and
- Questions about the ordering of tests that may be unnecessary for a veterinarian to make a diagnosis.

For more information on this consultation feedback, please refer to pages 29-32 of the full consultation report.

Consultation Feedback from Key Partners

Ontario Veterinary Medical Association (OVMA)

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

- Support for the requirement that orders be utilized per the veterinary facility director's discretion;
 - o Support is conditional on facility directors remaining veterinarian members; and
- Suggestion for some activities to be removed from the list of permitted activities under initiation, with the additional suggestion to include them in the list of activities permitted under orders:
 - o Preliminary hematology, cytology, and serology
 - o Taking a punch biopsy
 - o Cystocentesis
 - o Fine needle aspiration
 - o Putting an instrument, arm, hand, or finger beyond the opening of the urethra to place a urinary catheter
 - o Immobilizing a fracture of a bone or a dislocation of a joint or severed tendon for the purpose of temporary stabilization
 - o Administering a substance by injection for the purpose of fluid therapy as long as said substance is not a drug.

Ontario Association of Veterinary Technicians (OAVT)

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

- Support for the regulatory tool of initiation to be available exclusively for veterinary technician members;
- Support for the requirement to obtain informed client consent;
- Support for the proposed definition of initiation and proposed list of activities; and
- Suggestion to allow for orders and initiation to be used in coordination of one another.

- For example, if a veterinary technician member initiates and performs a clinical assessment, collects a blood sample, and completes a preliminary hematological laboratory test, the results of which are specified within an applicable order, can the veterinary technician member then continue to carry out additional authorized activities permitted by that order without additional steps or engagement with a veterinarian.

Other Submissions

- Support for the proposed list of activities permitted through initiation
 - Animal Shelter Professionals of Ontario; Ontario Federation of Agriculture
- Requests for clarity on the limits of initiation
 - Ottawa Humane Society
- Requests for clarity on the qualifications required to practice under initiation
 - ProVet Alliance
- Questions about how the process of initiation will work in practice
 - Alberta Veterinary Medical Association
- Requests for some activities to be removed from the list of permitted activities under initiation:
 - Ordering laboratory tests
 - Performing a punch biopsy
 - Cystocentesis
 - Fine needle aspiration
 - Placing a urinary catheter
 - Temporarily immobilizing a fracture
 - Ontario Association of Bovine Practitioners
- Suggestion for the addition of activities relevant to food animal practice, such as conducting post-mortems and laboratory specimen collection
 - Ontario Association of Swine Veterinarians; Ontario Association of Poultry Veterinarians

For more information related to these submissions, please refer to the beginning of page 131 of the full consultation report.

Further Information Gathered Based on Consultation Feedback

1. Confirmation of Core Competencies of Veterinary Technicians

Based on the feedback received through the consultation survey as well as the key partner submissions, an additional review was conducted of the OAVT core competencies as well as the Canadian Veterinary Medical Association Essential Skills List. In particular, the authorized activities suggested to be removed from the initiation list were once again compared to the competencies. Through this process, it was confirmed that the authorized activities proposed to be permitted through initiation were contained in the competencies and skillsets of veterinary technicians and therefore taught to all graduates.

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 entire authorized activity model, including orders, for review and consideration by both the profession and the public. This will include information related to how initiation can be used by veterinary teams.

Additional Context to Assist with Decision-Making

Based on the consultation feedback received and the additional information gathered, no additional changes or amendments to the regulatory concept related to initiation are suggested at this time.

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 – Regulatory Concept (as presented in the public consultation)

Concept Chart - Initiation

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 any additional questions raised.
Initiation	<p>General</p> <p>Transition Council proposes the development of regulation language related to initiation in accordance with Section 9 (2) of the <i>Veterinary Professionals Act, 2024 (VPA)</i>.</p> <p>Purpose</p> <p>The one profession, two professionals model enables the development of new approaches to practice that seek to fully utilize the skillset possessed by veterinary technicians to assist with public access to veterinary care. While the <i>VPA</i> establishes the framework for this approach, the development of additional detail required for full implementation is assigned to regulation.</p> <p>Overview</p> <p>The College of Veterinary Professionals of Ontario (CVPO) will be responsible for ensuring the delivery of safe and</p>	<p>The overarching recommendations related to circumstances in which veterinary technician members can practice through initiation have been developed in recognition of the enhanced level of professional judgement, decision-making, and accountability that would be required of veterinary technician members in these cases.</p> <p>The proposed list of authorized activities (or components of) for veterinary technician members to perform</p>	<p>The majority of authorized activities marked for initiation were confirmed by Transition Council in November 2024.</p> <p>Transition Council engaged in additional consideration related to two areas – the performance of rectal examinations and the performance of internal anal gland expression.</p> <p>Transition Council determined that the risks associated with the performance of</p>

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<p>quality veterinary care by its members including within the dynamics of veterinary teams where there may be different providers and methods of service delivery being utilized.</p> <p>Definition of Initiation</p> <p>Transition Council proposes the development of regulation language that includes the following definition of initiation:</p> <p style="padding-left: 40px;"><u>Initiation</u> means where a veterinary technician member is permitted to independently perform authorized activities without an order or delegation by a veterinarian member pursuant to the conditions set out in this Regulation.</p> <p>This definition is designed to provide context related to the process of initiation and a framework upon which further detail can be developed.</p> <p>Initiation and the Veterinarian-Client-Patient Relationship (VCPR)</p> <p>Transition Council proposes that initiation be permitted within a VCPR. In recognition of the emergent nature in which this tool may be used, Transition Council also proposes that initiation be permitted outside of a VCPR.</p> <p>Initiation and Informed Client Consent</p> <p>Transition Council proposes the development of regulation language that confirms that a veterinary technician member is required to obtain informed client consent whenever</p>	<p>through initiation has been developed based on extensive risk-based research and analysis. The proposed list has also been informed and guided by the core competencies developed by the Ontario Association of Veterinary Technicians that outline the skills that all veterinary technicians should possess upon completion of their education and training.</p> <p>The proposed list has also been developed with the following lens:</p> <ul style="list-style-type: none"> • Facilitating timely access to needed veterinary services; • Supporting team-based approaches to the delivery of veterinary care; and • Encouraging full utilization of all available skillsets within the one profession, two professionals model. 	<p>rectal examinations necessitated that it remains under either a veterinarian member's order or delegation.</p> <p>Transition Council confirmed that the performance of internal anal gland expression be added to the list of authorized activities permitted through initiation in January 2025.</p>

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<p>possible before proceeding through their own initiation regardless of whether a VCPR has been established.</p> <p>Veterinary Technician Members Performing Authorized Activities Through Initiation</p> <p>Transition Council proposes the development of regulation language that outlines the circumstances in which veterinary technician members are permitted to perform certain authorized activities through initiation. This includes:</p> <ul style="list-style-type: none"> • That the veterinary technician member has the knowledge, skills, and judgement to perform the authorized activity safely, effectively, and ethically; • That the veterinary technician determines that the animal(s) or group of animals' condition warrants the performance of the authorized activity, having considered: <ul style="list-style-type: none"> ○ The known risks and benefits to the animal(s) or group of animals of performing the authorized activity; ○ The predictability of the outcome of performing the authorized activity; and ○ The safeguards and resources available in the circumstances to safely manage the outcome of performing the authorized activity; 	<p>The process of initiation is designed for the performance of authorized activities and does not prevent veterinary technician members from initiating other forms of clinical veterinary medicine from an accredited veterinary facility in accordance with facility policies.</p>	

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<ul style="list-style-type: none"> • That the veterinary technician member remains professional responsible for determining that the animal(s) or group of animals' condition warrants performance of the authorized activity; • That the veterinary technician member remains professionally responsible for the performance of the authorized activity; and • The veterinary technician member coordinates care of the animal(s) or group of animals with a veterinarian member at the earliest opportunity. <p>Authorized Activities Permitted to be Performed by Veterinary Technician Members Through Initiation</p> <p>Transition Council proposes the development of regulation language that outlines the authorized activities (or components of) that are permitted to be performed by veterinary technician members through initiation. This includes:</p> <ul style="list-style-type: none"> • Communicating to an individual the death of an animal or group of animals; • Ordering the following laboratory tests on an animal or on specimens taken from an animal: <ul style="list-style-type: none"> ○ Preliminary Hematology ○ Preliminary Urinalysis ○ Preliminary Cytology ○ Preliminary Serology ○ Preliminary Parasitology; 		

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<ul style="list-style-type: none"> • Performing a procedure below the dermis for the purpose of: <ul style="list-style-type: none"> ○ Taking a blood sample ○ Taking a punch biopsy ○ Taking a skin scrape ○ Cystocentesis ○ Fine needle aspiration ○ Placing an IV catheter; • With respect to the care of a wound below the dermis or below a mucous membrane, any of the following procedures: <ul style="list-style-type: none"> ○ Cleansing ○ Probing ○ Compressing ○ Dressing; • Putting an instrument, arm, hand, or finger: <ul style="list-style-type: none"> ○ Beyond the larynx to place esophageal or endotracheal tubing ○ Beyond the opening of the urethra to place a urinary catheter ○ Beyond the point of the animal's nasal passage where they normally narrow to collect a swab sample or place nasogastric tubing ○ Beyond the labia majora to conduct a vaginal or cervical exam or collect a swab sample. ○ Beyond the anus or cloaca to check an animal's temperature 		

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<ul style="list-style-type: none"> ○ Beyond the anus to perform internal anal gland expression. • Immobilizing a fracture of a bone or a dislocation of a joint or severed tendon for the purpose of temporary stabilization; • Administering a substance by inhalation for the purpose of administering oxygen; and • Administering a substance by injection for the purpose of fluid therapy as long as said substance is not a drug. 		