



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.	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.
Putting a finger beyond the anus for the purpose of manipulating the tailbone.	Manipulating the tailbone is another 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.
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 chiros 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>

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	<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>

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	<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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	<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 		