



## AGENDA ITEM 8.1

### **TOPIC:     Licensure**

### **History of Topic**

#### *General Information*

One of the fundamental roles of the College is to review applicants for licensure to determine their suitability to practise veterinary medicine in Ontario.

The College has been operating under the same licensure structure for veterinarians established by the *Veterinarians Act (VA)* and Regulation 1093 since 1990. Though advancements in approaches to licensure have been achieved through policy, the College has been limited in its ability to adapt and enhance its licensure program to reflect evolution in the practice of veterinary medicine. This has resulted in an overreliance on the Registration Committee's ability to extend or limit certain licensure requirements on a case-by-case basis and has led to an increase in both staff and committee workload to craft solutions for the different types of applicants that seek to practise in Ontario.

Since 1993, the *Ontario Association of Veterinary Technicians Act, 1993* has granted the Ontario Association of Veterinary Technicians (OAVT) the ability to register individuals who meet the qualifications and conditions set out in the OAVT's by-laws and to permit use of the titles "Registered Veterinary Technician" or "Registered Veterinary Technologist" in the province of Ontario. Though not equivalent to a professional licence, this designation has been used for over 30 years to communicate to the public which individuals possess the skills, knowledge, and judgement to safely practise as a veterinary technician and has served as a basis for ongoing conversations related to regulation of the veterinary profession as a whole.

The *Veterinary Professionals Act, 2024 (VPA)* creates the statutory framework for both veterinarians and veterinary technicians to become members of the College of Veterinary Professionals of Ontario (CVPO) under the one profession, two professionals model.

This legislation requires an overall update to the College's current licensure approach while also offering opportunities to instill more agile approaches moving forward.

## *Legislative Framework*

Sections 14 and 93 (1) 12-14 of the *VPA* provide the statutory framework for the development regulation language related to licensure.

## **Development of Regulatory Concept by Transition Council**

Transition Council reviewed and forwarded for public consultation a regulatory concept related to licensure in September 2024. This concept included two primary sections:

### Section One - General Licensure Categories and Requirements

#### 1. Applicant Requirements

Transition Council proposed the development of regulation language that outline general application requirement for all applicants to the CVPO including those related to professional suitability (including background checks), eligibility to work, and language requirements.

#### 2. Additional Requirements Related to Licensure Types

Transition Council proposed the development of regulation language that outlines three sub-classes of licensure for both veterinarian and veterinary technician members.

#### *General Licence*

This subclass of licence will be for applicants who are competent to provide the full scope of practice for veterinarians or veterinary technicians. It will also include applicants who have completed a limited licensure assessment or specialty that has confirmed competency in a narrowed scope of practice (including those limited to certain areas of public service, academia, specialty, or scope of practice). For the latter, terms, conditions, and/or limitations will be placed on the general licence based on the demonstrated competencies.

#### *Provisional Licence*

This subclass of licence will be for applicants who are actively undergoing a competency assessment process and will permit them to practise under the supervision of a veterinarian member while completing the requirements for a general licence. It will also include individuals who are completing an education program, internship, or residency.

This subclass will be time-limited and will be valid for three (3) years starting on the date that it is issued to ensure that applicants remain dedicated and active in their pursuit of a general licence.

### *Short-Term Licence*

This subclass of licence will permit applicants to provide veterinary services in Ontario for a specific short-term purpose such as a state of emergency or specific locum arrangements.

Applicants for a short-term licence as a **veterinarian** will be required to obtain the Registrar's approval for their proposed work and to practise at or from an accredited veterinary facility where the Veterinary Facility Director has assumed and confirmed responsibility to continue any care provided.

Applicants for a short-term licence as a **veterinary technician** will be required to obtain the Registrar's approval for their proposed work and to work under the delegation and supervision of a veterinarian member at or from an accredited facility where the Veterinary Facility Director has assumed and confirmed responsibility to continue any care provided.

Specific competency requirements for veterinarian and veterinary technician members would be outlined at a higher level in regulation with additional details contained in CVPO policy including:

- Specific competency requirements for veterinarians including proof of education (e.g., DVM) and assessment(s) (e.g., NAVLE, National Board Exams); and
- Specific competency requirements for veterinary technicians including proof of education (e.g., approved veterinary technician or veterinary technologist program) and assessment(s) (e.g., VTNE).

## Section Two – Transfer of Licensed Veterinarians and Licensing of Veterinary Technicians Registered with the Ontario Association of Veterinary Technicians (OAVT)

### 1. Transfer of Existing Veterinarian Licences

Transition Council proposed the development of regulation language that permits veterinarians licensed under the VA to automatically have their licences transferred under the VPA with the same terms, conditions, and limitations that exist on their current licence. Transition Council further proposed that veterinarians licensed under the VA be required to complete a module in veterinary jurisprudence related to the VPA within a timeframe determined by Transition Council and that the completion of this module not affect the transfer of their licence.

### 2. Licensing of Veterinary Technicians Currently Registered with the OAVT

Transition Council proposed the development of regulation language that permits the creation of a specific pathway for veterinary technicians currently registered with the OAVT to apply for licensure with the CVPO. Transition Council further proposed that this specific pathway include the requirement to complete Transition Council further proposed that veterinarians licensed under the VA be required to complete a module in

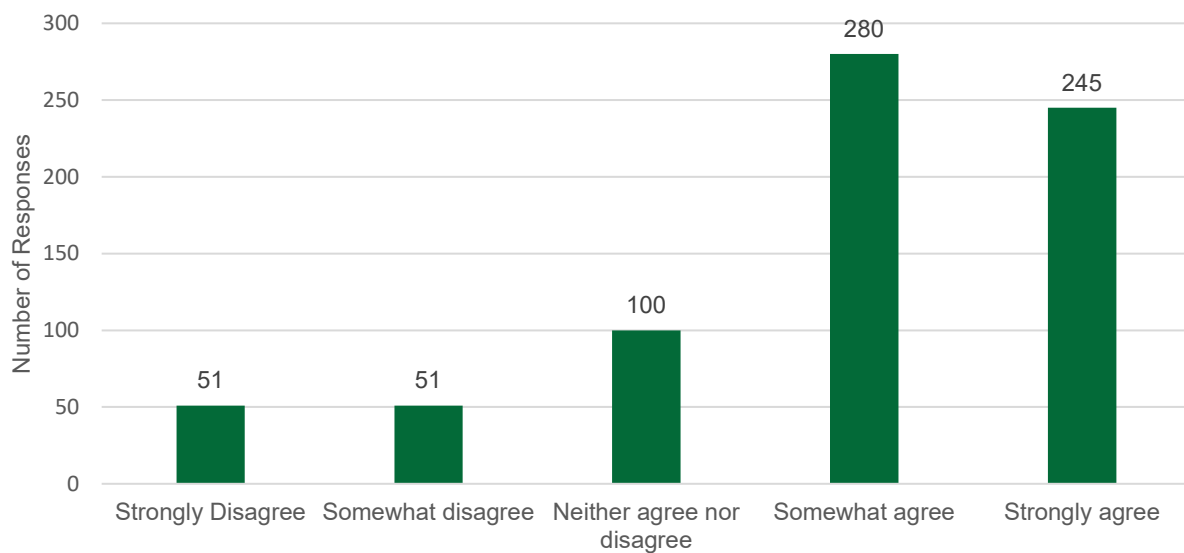
veterinary jurisprudence related to the VPA within a timeframe determined by Transition Council and that the completion of this module not affect the obtainment of a licence.

## General Consultation Feedback

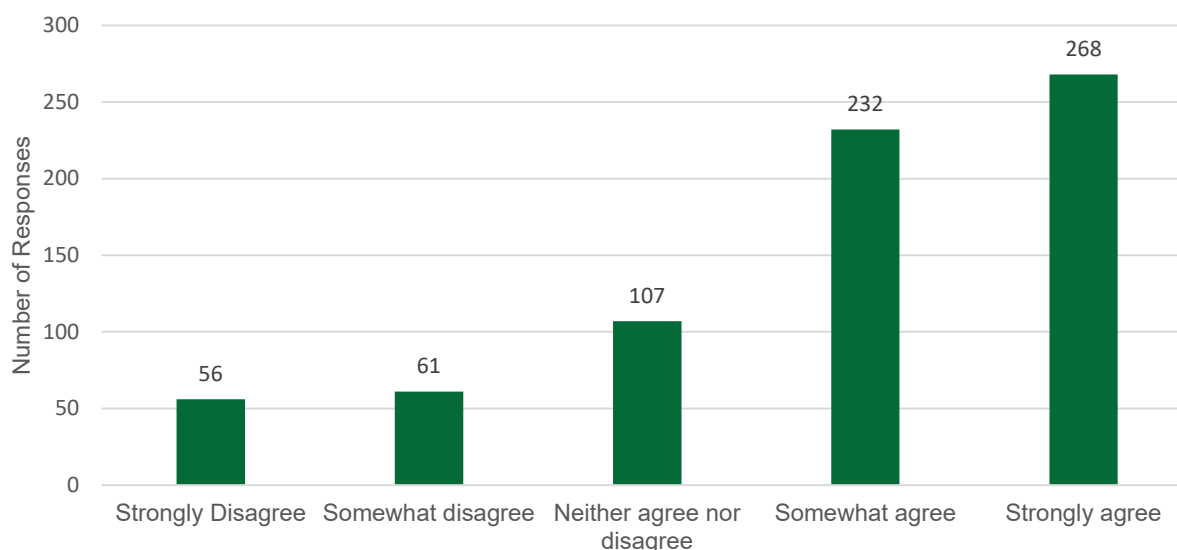
Licensure was included in the list of regulatory concepts that were circulated for public consultation from February 11 to April 16, 2025.

The following quantitative responses were received related to licensure:

Survey respondents were asked to indicate their agreement with two statements about Licensure on Likert scale of responses from “Strongly disagree” to “Strongly agree”. The figure below presents the results of 727 responses to the statement “*The proposed subclasses of member licences are inclusive of all types of members*”.



The figure below presents the results of 724 responses to the statement “*The proposed licensure requirements are appropriate to protect the public*”.



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

- Specific comments related to the proposed regulatory language, particularly:
  - o Questions related to non-registered auxiliaries and support staff and their place within the new system;
  - o Comments on the differences between the licensing process for veterinarians currently licensed with the College and veterinary technicians registered with the OAVT;
  - o Requests for more clarity related to short-term licence; and
  - o Requests for more clarity related to provisional licence.

For more information on this consultation feedback, please refer to pages 13-16 of the full consultation report.

## Consultation Feedback from Key Partners:

*Ontario Veterinary Medical Association (OVMA)*

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

- Request for terminology changes related to licensure categories including revising 'General Licence' to be 'Full Licence' or 'Unrestricted Licence'; and
- Request for clarity around requirements for a jurisprudence module for licence transfer.

### *Ontario Association of Veterinary Technicians (OAVT)*

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

- Overall support for the model;
- Requests in parity of approach for veterinarians and veterinary technicians related to the jurisprudence module; and
- Interest in ongoing discussions related to the process for licensure for veterinary technicians.

### *Other Submissions*

- Requests for clarity around licensure pathways for veterinary technicians
  - o Ottawa Humane Society; Alberta Veterinary Medical Association
- Request for terminology changes related to licensure categories
  - o Ontario Association of Bovine Practitioners
- General support for concept
  - o ProVet Alliance; Ontario Federation of Agriculture
- Support for inclusion of pathways for limited licensure
  - o Ontario Association of Swine 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. General Licence Terminology**

The term “general” has been used to refer veterinarian licences since the VA and Regulation 1093 were first introduced in 1990. This term is commonly known amongst both the profession and the public related to the practice of veterinary medicine and is also commonly used by other professions, such as nursing and chiropractic.

Under the proposed licensure model, those holding a general licence will hold a licence either with or without terms, conditions, or limitations. If an individual’s general licence has any associated terms, conditions, or limitations (such as a requirement to only practise on certain species or in certain specialties) then these will be clearly laid out on the public register.

This model has been designed to move away from the previous use of the term “restricted” when referring to licences with terms, conditions, and limitations and instead more accurately reflects the ability for these members to practise in the areas in which they have demonstrated competency.

### **2. Proposed Transition for Veterinary Technicians Registered with OAVT**

The proposed licensure model has been designed to facilitate as straightforward as possible of an application process for veterinary technicians currently registered with the OAVT to become members of the CVPO. This process will include the submission of an application (which will be

subject to overall licensing requirements such as criminal record checks, conduct declarations, etc.) as well as associated application and licensing fees in accordance with the CVPO's By-laws.

### 3. Jurisprudence Module Requirements

The jurisprudence module requirement for veterinarians currently licensed with the College and veterinary technicians currently registered with the OAVT will be applied equally to these two categories. Veterinarians will see their licences automatically transferred over on the day that the *VPA* comes into effect. Veterinary technician members who apply within a certain time frame (predicted to be within four (4) months of the *VPA* coming into full effect) will also be able to obtain licensure upon completion of this application process. Both groups, however, will be expected to complete a jurisprudence module within a timeframe determined by the Transition Council. Should this module not be completed, the member will then be subject to professional review by the College for failing to complete this requirement.

### 4. Specialist Designations

During the consultation process, the College was also directly approached with questions related to the recognition of specialists. The College expects that the CVPO will continue to recognize specialist designation under the *VPA*. This is currently achieved through the following approach:

Section 36 (3) and (4) of Regulation 1093 under the *VA* currently states:

(3) A member shall not use a term, title or designation which indicates specialization in veterinary medicine or represents to the public that the member is a specialist or is specially qualified in a branch of veterinary medicine, unless the member is qualified in that specialization in accordance with subsection (4).

(4) In order to be qualified in a specialization for the purposes of subsection (3), a member must be a graduate of a program that is approved by the Council and is designed to educate a person to be a veterinary specialist in that area.

This regulatory language was last updated in 2022 and was marked by the College as requiring no additional amendments or changes under the new statutory framework.

Sections 82 (1) (b) of the *VPA* states:

The Registrar shall maintain one or more registers which shall include .... 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.

Section 93 (1) 22 of the *VPA* states:

Subject to the approval of the Lieutenant Governor in Council, the Council may make regulations... governing the designation of members as specialists, including prescribing the qualifications and requirements for designation as a specialist, prescribing classes or

categories of specialists, governing the powers and duties of specialists, governing the suspension or revocation of such designations, and governing the regulation and prohibition of the use of such designations.

This statutory framework provides the necessary tools to continue the language currently outlined in Regulation 1093.

If this wording is carried forward as currently written, the ability to qualify for specialist designation (including the type of member who can qualify) will continue to be determined by the CVPO Council through the development of College Policy. It is expected that current recognition (veterinarian members who have obtained board-certified specialties) will remain the only specialties recognized until such time that the CVPO Council determines that it wishes to make amendments to this approach. The College is also aware of both existing and emerging specialist opportunities for veterinary technicians, which may also be managed by the CVPO Council, should it decide to do so.

## **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 licensure 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 - Licensure

| 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. |
| <b>Licensure</b>   | <p><b>General</b></p> <p>Transition Council proposes the development of regulation language related to licensure in accordance with Sections 14 and 93 (1) 12-14 of the <i>Veterinary Professionals Act, 2024 (VPA)</i>.</p> <p>This regulation language will apply to both veterinarian and veterinary technician members.</p> <p><b>Purpose</b></p> <p>The College of Veterinary Professionals of Ontario (CVPO) will be responsible for reviewing the education and credentials of applicants to determine whether they are competent to safely practice veterinary medicine. This will be achieved through the licensure process.</p> <p><b>Overview</b></p> | <p>General application requirements including those related to conduct (including background checks), eligibility to work, and language requirements will be outlined at a higher level in regulation with additional details contained in CVPO policy.</p> <p>Specific competency requirements for veterinarians will be outlined in CVPO policy and will include proof of education (ex. DVM) and assessment(s) (ex. NAVLE, National Board Exams).</p> | Transition Council confirmed the regulatory concept related to licensure in September 2024.                    |

| Section | Primary Concepts Confirmed by Transition Council  | Additional Information   | Date of Confirmation |
|---------|---|--|----------------------|
|         | <p>The CVPO will oversee two classes of licensure – one for veterinarians and one for veterinary technicians. Each class of licensure will have three subclasses – General, Provisional, and Short-Term.</p> <p>The creation of new licensure categories will result in the need for existing licence types under the <i>Veterinarians Act</i> to merge into one of the three subclasses.</p> <p><b>Transfer of Veterinarian Licences</b></p> <p>Veterinarians licensed under the <i>Veterinarians Act</i> will automatically have their licences transferred over under the <i>VPA</i> with the same terms, conditions, and limitations that exist on their current licence. Some veterinarians who hold restricted licences with specific practice requirements (ex. specialists who hold licences to practice in their area of specialty) will be contacted prior to the full introduction of the new licensure model to transfer their licence to the most appropriate new category. All veterinarians will continue to be able to practice in the same way that they are currently permitted.</p> <p>Veterinarians licensed under the <i>Veterinarians Act</i> will be required to complete a module in veterinary jurisprudence related to the <i>VPA</i> within a timeframe determined by Transition Council. The completion of this module will <u>not</u> affect the transfer of a veterinarian's licence and will be a requirement for all current members.</p> | <p>Specific competency requirements for veterinary technicians will be outlined in CVPO policy and will include proof of education (ex. approved veterinary technician or veterinary technologist program) and assessment(s) (ex. VTNE).</p> <p>All applicants will be required to meet requirements related to veterinary jurisprudence.</p> <p>The Licensing Committee (formerly the Registration Committee) will retain its ability to waive or amend any of the licensing requirements for an applicant.</p> |                      |

| Section | Primary Concepts Confirmed by Transition Council   | Additional Information | Date of Confirmation |
|---------|--|------------------------|----------------------|
|         | <p><b>Veterinary Technicians Currently Registered with the Ontario Association of Veterinary Technicians (OAVT)</b></p> <p>Veterinary technicians currently registered with the OAVT will have a specific pathway for applying for licensure with the CVPO. This will include the requirement to complete a module in veterinary jurisprudence related to the VPA within a timeframe determined by Transition Council.</p> <p><b>Application Process for New Members</b></p> <p>All individuals who are not currently licensed under the <i>Veterinarians Act</i> will be required to submit an application for licensure to the CVPO. This requirement will apply to all veterinarians and veterinary technicians including those veterinary technicians currently registered with the OAVT. The application date for licensure with the CVPO has not yet been determined but will be communicated publicly prior to commencement.</p> <p><b>New Licence Types under the VPA</b></p> <p><i>General Licence</i></p> <p>This subclass of licence will be for applicants who are competent to provide the full scope of practice for veterinarians or veterinary technicians. It will also include applicants who have completed a limited licensure assessment that has confirmed competency in a narrowed scope of practice. For the latter, terms, conditions, and/or</p> |                        |                      |

| Section | Primary Concepts Confirmed by Transition Council  | Additional Information | Date of Confirmation |
|---------|---|------------------------|----------------------|
|         | <p>limitations will be placed on the general licence based on the demonstrated competencies.</p> <p><i>Provisional Licence</i></p> <p>This subclass of licence will be for applicants who are actively undergoing a competency assessment process and will permit applicants to practice under the supervision of a veterinarian member while completing the requirements for a general licence.</p> <p>This subclass will be time-limited and will be valid for three (3) years starting on the date that it is issued to ensure that applicants remain dedicated and active in their pursuit of a general licence.</p> <p><i>Short-Term Licence</i></p> <p>This subclass of licence will permit applicants to provide veterinary services in Ontario for a specific short-term purpose such as a state of emergency.</p> <p>Applicants for a short-term licence as a veterinarian will be required to obtain the Registrar's approval for their proposed work and to practice at or from an accredited veterinary facility where the Veterinary Facility Director has assumed and confirmed responsibility to continue any care provided.</p> <p>Applicants for a short-term licence as a veterinary technician will be required to obtain the Registrar's approval for their proposed work and to work under the delegation and supervision of a veterinarian member at or from an</p> |                        |                      |

| Section | Primary Concepts Confirmed by Transition Council   | Additional Information | Date of Confirmation |
|---------|--|------------------------|----------------------|
|         | accredited facility where the Veterinary Facility Director has assumed and confirmed responsibility to continue any care provided. |                        |                      |