

College of Veterinarians of Ontario (CVO) Proposed Accreditation Model

Discussion Paper

Summary of Proposal

The College of Veterinarians of Ontario (the College) oversees the practice of veterinary medicine in Ontario under the *Veterinarians Act* and Regulation 1093 (and further, via by-laws and policies established by the College). As the regulatory body for veterinarians, the College licenses over 5,000 veterinarians across the province.

In addition to licensing qualified individuals, the College is also responsible for inspecting and accrediting the veterinary facilities from which these licensed veterinarians practise. Veterinarians in Ontario must practise from an accredited veterinary facility. There are currently more than 1,500 veterinary practices operating 2,300 facilities (including mobile facilities) across the province.

The College's Facility Accreditation program ensures veterinary facilities provide a professional environment and contain the essential equipment required for patient care. In exercising this mandate, the College seeks to protect the public interest and enhance the quality and safety of veterinary care.

The model for accrediting veterinary facilities set out in Regulation 1093 no longer reflects the current practice of the veterinary medical profession and the range of veterinary facility types from which veterinarians practise. This model is based on a specific set of facility categories that are set out in Regulation 1093.

Veterinary practice has become increasingly specialized in nature. At the same time, some practice owners are seeking greater flexibility to provide a broader scope of services/procedures to animal species which do not align perfectly with the rigid requirements in the current accreditation framework. As a result, the College and its veterinarian members have experienced the following:

- Duplicative and inflexible requirements that some veterinary facilities must meet (e.g., being required to have a specific piece of equipment in the practice that is unlikely to be needed given the nature of the practice);
- Unnecessary steps in the internal oversight activities of the College requiring requests from members of the College for exemptions (e.g., veterinary practice owners seeking exemptions from the College's Accreditation Committee in order to provide a very narrow scope of practice); and
- Limitations on the scope of services veterinarians are permitted to provide clients and patients due to the prescriptive list of facility categories that are permitted in Ontario (e.g., a companion animal hospital in a rural community that may also wish to provide some equine mobile and/or large animal mobile services to farms is currently required to seek additional certificates of accreditation from the College).

The College and its members have also raised related concerns with current requirements under Regulation 1093 for approving veterinary facility names and restrictions on advertising.

The Ontario government is committed to cutting red tape and reducing unnecessary regulatory burden for all businesses, to lower business operating costs and improve Ontario's competitiveness. As part of this effort, the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA) and the Council of the College are proposing changes to Regulation 1093. The proposed changes would allow the College to adopt a new, streamlined, outcome-based accreditation model for veterinary facilities.

The proposed accreditation model would continue to be a sustainable model based on cost recovery where revenues and costs are balanced. It would not alter the existing framework of cost recovery for veterinary practice owners, nor would it impact the quality of animal care. A move away from a prescriptive, list-based approach to accreditation would also reduce administrative burden, offer more flexibility and encourage expansion and innovation in the services veterinarians offer to the public, while protecting the public interest and instilling confidence in veterinary regulation and the quality and safety of veterinary care.

Regulation changes proposed for the accreditation model, facility naming and advertising are outlined in more detail below.

1. Accreditation Model

The proposed accreditation model would enable a flexible and dynamic program that meets the needs of facility accreditation, enhance accountability related to facilities and inspire greater public confidence in how physical facilities are overseen. The new model would permit a veterinarian to define the scope of practice and species that is associated with the facility and would improve flexibility and reduce administrative burden as veterinary care and services evolve.

The proposed facility accreditation and inspection model would:

- Provide a model of facility accreditation that reflects the services and scopes of practice that are relevant to a specific facility and to the Ontario context;
- Provide a dynamic, progressive facility accreditation program that allows for change and growth in the profession;
- Reduce administrative burden for veterinarians whose practice includes a diverse range of species (i.e., a mixed practice) or those who have a very specific scope of practice (e.g., a veterinarian who specializes in providing palliative end-of-life care for companion animals);
- Reduce burden for the College by reducing the need for veterinary practice owners to request exemptions from the College's Accreditation Committee; and
- Enhance and strengthen the image of the veterinary profession by continuing to protect the public interest and enhance the quality and safety of veterinary care.

2. Facility Naming

Under the current accreditation model, veterinary facilities are subject to restrictive and prescriptive facility naming requirements (i.e., what a veterinary facility can, and cannot, be named under sections 11 and 41 of Regulation 1093).

Before a veterinary facility can be accredited by the Registrar or Accreditation Committee and offer services to clients and patients, the facility's name must be approved by the Registrar. The name approval process can take several weeks and may delay a facility's opening and ability to provide veterinary services. This can be a particular burden in cases where a veterinarian is opening a new practice or when an existing practice has been sold and is being re-named.

Removing the requirements related to the naming of veterinary facilities would align with the proposed new accreditation model and would reduce administrative burden and improve competitiveness for veterinary facilities across Ontario.

3. Advertising

Once a facility has been accredited by the College, a significant investment by the practice owner is often required to build recognition and awareness in the community and to attract new clients. These efforts are tied directly to facility naming. Under the current Regulation, provisions related to advertising provisions are restrictive, contain language that is not directly related to advertising and do not reflect how the public seeks information in a technological age (e.g., the current regulatory restrictions significantly limit the use of testimonials and reviews).

Under the proposed new accreditation model, veterinarians would be able to develop and advertise veterinary facilities that reflect their specific areas of practice/specialties. Removing prescriptive provisions related to advertising (e.g., as they relate to online testimonials and reviews) would also align with the government's Open for Business mandate, allow for greater creativity in how new business can be generated and improve competitiveness for veterinarians and their practice(s).

Consultation

The Council of the College and OMAFRA are seeking feedback from veterinarians, animal owners (including livestock and poultry producers), industry and public interest advocacy organizations, and members of the public on the proposed amendments as outlined in this paper. Your feedback will be considered during the development of potential changes to Regulation 1093.

Questions for Consultation

1. Do you agree with the changes described in this proposal? Why or why not?
2. Do you have any specific concerns with any of the items discussed in this proposal?
3. Would the proposed changes reduce burden or contribute to additional opportunities or other impacts for your business?

How to provide feedback

By email (feedback can be sent to either email address, or both)

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Attention: Consultation on Proposed Veterinary Facility Accreditation Model