



## AGENDA ITEM 9.3

### TOPIC: Orders

## 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 – the development and use of orders.

### *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 order in November 2024. This concept included:

1. Definition of Order

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

Suggested Definition
<b>Order:</b> Means the process whereby a veterinarian member may direct a veterinary technician member to perform an authorized activity pursuant to the conditions set out in this Regulation.

2. Ability to Develop and Use an Order Within and Outside of a Veterinarian-Client-Patient Relationship (VCPR)

Transition Council proposed the development of regulation language that includes the ability for orders to be developed and utilized for the performance of authorized activities by veterinary technician members both within and outside of a VCPR in recognition of the emergent nature in which authorized activities may need to be performed.

3. Ongoing Expectations for Informed Client Consent

Transition Council proposed the development of regulation language that includes confirmation that a veterinary technician member is required to obtain informed client consent prior to proceeding with performing authorized activities pursuant to the order of a veterinarian member regardless of whether a VCPR has been established.

4. Further Parameters Around When Orders can be Developed and Utilized

Transition Council proposed the development of regulation language that outlines several overarching components that must be met by either a veterinarian or veterinary technician member before an order can be utilized. These include:

Veterinarian Members	Veterinary Technician Members
<ul style="list-style-type: none"> <li>• Orders must be in writing.</li> <li>• Can only develop orders for authorized activities that they themselves are competent to perform.</li> <li>• Must ensure that the veterinary technician member(s) practising pursuant to their order are competent to perform the included authorized activities.</li> <li>• Remain professionally responsible for the proper development and oversight of orders.</li> <li>• Must remain readily available to perform the authorized activities if required or requested.</li> </ul>	<ul style="list-style-type: none"> <li>• Required to only perform authorized activities that they are competent to perform.</li> <li>• Can refuse to perform authorized activities that they are not competent in or comfortable with.</li> <li>• Remain professionally responsible for the decision to carry out an authorized activity under a veterinarian’s order as well as their own performance.</li> <li>• Remain professionally responsible for ensuring adherence to a veterinarian member’s order as written.</li> </ul>

	<ul style="list-style-type: none"> <li>• Remain professionally responsible for coordinating with a veterinarian member when care falls outside of the parameters of an order.</li> </ul>
--	--

5. Authorized Activities Permitted to be Performed by Veterinary Technician Members Pursuant to the Order of a Veterinarian Member

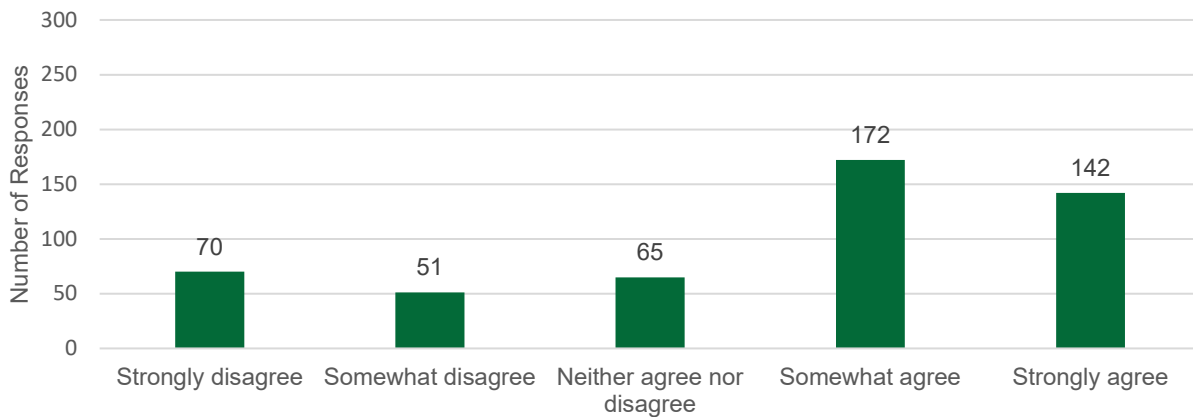
Transition Council proposed the development of regulation language that permits all delegable authorized activities (or components of) to be the subject of orders.

### General Consultation Feedback

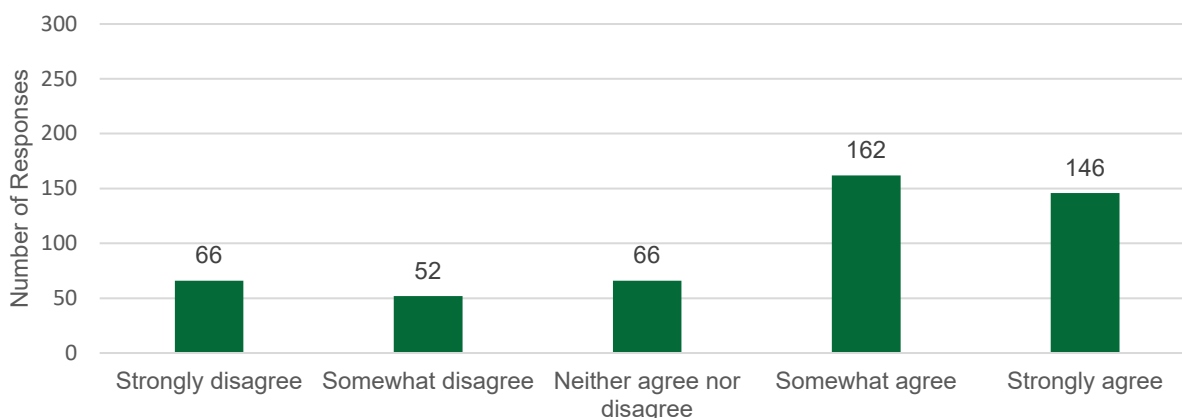
A regulatory concept related to order was included in the list of regulatory concepts that were circulated for public consultation from February 11 to April 16, 2025.

The following quantitative responses were received related to order:

Survey respondents were asked to indicate their agreement with two statements about Orders on Likert scale of responses from “Strongly disagree” to “Strongly agree”. The figure below presents the results of 500 responses to the statement “*The model for orders is appropriate.*”.



The figure below presents the results of 492 responses to the statement “*The proposed safeguards related the use of orders (only in an accredited veterinary facility and where approved by the veterinary facility director with professional responsibilities for both types of members) are adequate to protect the public.*”.



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

- Questions related to the requirement for orders to be in writing;
- Questions seeking clarity on delegable and non-delegable activities permitted to be included in an order; and
- General support for the regulatory concept.

For more information on this consultation feedback, please refer to pages 27-29 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
- Requests for the College to provide educational support to clinics inclusive of sample templates and expectations.

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

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

- Strong support for the inclusion of order as a regulatory tool;
- Request that orders for the purpose of carrying out authorized activities only remain available to licensed members of the CVPO;
- Requests for the College to develop standards or templates to assist veterinary facilities in developing orders;
- Support for the inclusion of all delegable activities for use in orders; and
- Highlights that the requirement for orders to be in writing may be an administrative burden and substantial workload for veterinary facility directors, and suggests the resources developed by the College could assist with this.

### *Other Submissions*

- Request for more clarity on the limits of orders
  - o Ottawa Humane Society; ProVet Alliance
- Support for facility director oversight of orders
  - o Ontario Association of Bovine Practitioners
- Overall support for the regulatory concept
  - o Ontario Association of Swine Veterinarians; Ontario Association of Poultry Veterinarians

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

## **Further Information Gathered Based on Consultation Feedback**

1. Requirements Related to Veterinary Facilities and Facility Policies Established by the Veterinary Facility Director

In recognition of some of the consultation feedback received, it is confirmed that the regulatory concept contained the expectation that orders only be permitted to be used from veterinary facilities and in accordance with the facility policies established by the Veterinary Facility Director.

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 orders can be developed and implemented.

## 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 orders 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 - Orders

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
<p>This column outlines the specific section of regulation.</p>	<p>This column provides a description of the objectives sought and the associated reasoning.</p>	<p>This column provides any additional specific information required to ensure clarity.</p>	<p>This column outlines when Transition Council confirmed the concept as well any additional questions raised.</p>
<p><b>Orders</b></p>	<p><b>General</b></p> <p>Transition Council proposes the development of regulation language related to orders in accordance with Section 9 (2) of the <i>Veterinary Professionals Act, 2024 (VPA)</i>.</p> <p><b>Purpose</b></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><b>Overview</b></p> <p>The College of Veterinary Professionals of Ontario (CVPO) will be responsible for ensuring the delivery of safe and quality veterinary care by its members including within the</p>	<p>The overarching recommendations related to circumstances in which veterinarian and veterinary technician members can employ orders have been developed in recognition of the enhanced level of professional judgement, decision-making, and accountability that would be required of both professionals in these cases.</p> <p>Veterinarian members would also be permitted to develop orders that outline the ways in which veterinary technician</p>	<p>Transition Council confirmed the approach for orders within authorized activity model in November 2024.</p>

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<p>dynamics of veterinary teams where there may be different providers and methods of service delivery being utilized.</p> <p><b>Definition of Order</b></p> <p>Transition Council proposes the development of regulation language that includes the following definition of order:</p> <p style="padding-left: 40px;"><u>Order</u> means the process whereby a veterinarian member may direct a veterinary technician member to perform an authorized activity or set of authorized activities for a specific routine treatment plan or purpose pursuant to the conditions set out in this Regulation.</p> <p>This definition is designed to provide context related to the development and use of orders and a framework upon which further detail can be developed. This framework is being proposed based on existing structures and processes that exist in human healthcare, as well as in recognition that similar processes already exist in areas of veterinary medicine, such as the use of standard operating procedures (SOPs).</p> <p><b>Orders and the Veterinarian-Client-Patient Relationship (VCPR)</b></p> <p>Transition Council proposes that orders be permitted within a VCPR. In recognition of the emergent nature in which this tool may be used, Transition Council also proposes that orders be permitted outside of a VCPR.</p>	<p>members can perform authorized activities. In this, a veterinarian member could decide to include requirements related to supervision but could also allow for a veterinary technician member to independently perform authorized activities if they adhere to the requirements of the order and CVPO Policies, such as those made related to prescribing and dispensing.</p> <p>While orders are primarily designed to facilitate the performance of authorized activities, a veterinarian member would also be permitted to include other aspects of clinical veterinary medicine within their order for performance by a veterinary technician member.</p>	

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<p><b>Orders and Informed Client Consent</b></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 possible before proceeding under a veterinarian member's order regardless of whether a VCPR has been established.</p> <p><b>Further Parameters Around When Orders Can Be Developed and Utilized</b></p> <p>Transition Council proposes the development of regulation language that outlines the circumstances in which veterinarian members would be permitted to develop orders and veterinary technician members would be permitted to practice under a veterinarian member's order. This includes:</p> <p><u>Veterinarian Members</u></p> <ul style="list-style-type: none"> <li>• Required to develop orders in writing;</li> <li>• Can only develop orders for authorized activities that they themselves are competent to perform;</li> <li>• Must ensure that the veterinary technician member(s) working pursuant to their order are competent to perform the included authorized activities;</li> <li>• Remain professionally responsible for the proper development and oversight of orders; and</li> </ul>		

Section	Primary Concepts Confirmed by Transition Council	Additional Information	Date of Confirmation
	<ul style="list-style-type: none"> <li>• Must remain readily available to perform the authorized activities if required or requested.</li> </ul> <p><u>Veterinary Technician Members</u></p> <ul style="list-style-type: none"> <li>• Required to only perform authorized activities that they are competent to perform;</li> <li>• Remain able to refuse to perform authorized activities that they are not competent in or comfortable with;</li> <li>• Remain professionally responsible for the decision to practice under a veterinarian member's order as well as their own performance;</li> <li>• Remain professionally responsible for ensuring adherence to a veterinarian member's order as written; and</li> <li>• Remain professionally responsible for coordinating with a veterinarian member when care falls outside of the parameters of an order.</li> </ul> <p><b>Authorized Activities Permitted for Use in Orders</b></p> <p>Transition Council is proposing the development of regulation language that permits all delegable authorized activities to be used in orders.</p>		