



AGENDA ITEM 7.2

TOPIC: Veterinarian-Client-Patient Relationship (VCPR)

Overview

The College is proposing the development of regulation language related to the veterinarian-client-patient relationship (VCPR) in accordance with Section 93 (1) 23 of the *Veterinary Professionals Act, 2024*.

Relevant Sections

An overview of the relevant sections of legislation, regulation, by-law, and policy related to the VCPR (both current and future) has been attached to this cover sheet as Appendix “A”.

History of College Work Related to the VCPR

Current Framework

VCPR

The VCPR is the foundation upon which the delivery of clinical veterinary medicine is based.

Section 18 (2) (a) to (c) of Regulation 1093 made under the *Veterinarians Act* requires veterinarians to form a professional relationship with a client and their animal(s) prior to providing a singular or group of veterinary services.

Regulation 1093 does not contain any rules or language outside of the establishment of this relationship (including any rules related to maintaining or discontinuing). It also does not formally name the professional relationship.

The College’s *Professional Practice Standard: Establishing, Maintaining, and Discontinuing a VCPR* provides the formal name for the VCPR and states that a VCPR must be established by a veterinarian and that a veterinarian can choose when they enter into a VCPR. A veterinarian is required to inform client(s) of the ways in which the VCPR will be maintained at the time that it is established. This includes whether they will maintain the VCPR directly, or whether it will be maintained by the veterinary team working through the accredited veterinary facility where it was established, including other veterinarians and those working under a veterinarian’s supervision and delegation (including veterinary technicians). A VCPR is also required to be discontinued by a veterinarian working through the accredited veterinary facility at which it was established.

Section 20 of Regulation 1093 made under the *Veterinarians Act* indirectly ties the provision of after-hours veterinary care to the VCPR, requiring veterinarians to provide reasonably prompt



and medically necessary veterinary services to all animals that they have treated recently or treat regularly.

Regulatory Exemptions

Section 18 (3) of Regulation 1093 made under the *Veterinarians Act* outlines a list of circumstances in which the requirements for a VCPR do not apply. These exemptions include emergency situations, working as an employee of the Crown, providing veterinary services under another Act, providing veterinary services through a temporary facility, and conducting independent exams.

Inclusion in Legislative Reform

The College's 2018 Concept Paper entitled "Achieving a Modern Approach to the Regulation of Veterinary Medicine in Ontario" contained several recommendations related to the inclusion of both veterinarians and veterinary technicians as licensed professionals under the same statutory framework. As part of this proposal, the Concept Paper indicated the need to continue to adhere to ongoing public expectations related to the practice of veterinary medicine, including the importance of ongoing accountability, client consent, and collaborative teamwork.

Since the Concept Paper was developed in 2018, the College has undertaken additional research and outreach related to the VCPR to ensure currency and consistency. This has included ongoing engagement with several interested parties, including the:

- Ontario Veterinary Medical Association;
- Ontario Association of Veterinary Technicians; and
- Direct conversations with veterinarians and veterinary technicians.

What Will This Look Like?

The practice of veterinary medicine will continue to be overseen by the College under the *Veterinary Professionals Act, 2024*. Both veterinarians and veterinary technicians will become licensed members of the College under the one profession, two professionals model and will be required to adhere to all legislative, regulatory, and College policy requirements related to their practise of veterinary medicine.

A VCPR will continue to be required to be established prior to the provision of any veterinary service(s) unless otherwise specifically stated.

Previous Conversation at the Transition Council Table and Additional Research

In December 2024, Transition Council engaged in thoughtful and innovative conversation related to potential future models for the practice of veterinary medicine in Ontario. This



included conversation related to the future of the VCPR and whether there was possibility for both types of members to establish these relationships.

Based on this feedback, College staff conducted further analysis to assist with further consideration at the Transition Council table including:

1. Additional Consideration of the Framework Permitted Under the *Veterinary Professionals Act, 2024*

A focused review of the statutory and regulatory framework and allowances outlined in the *Veterinary Professionals Act, 2024* was conducted to ensure that all concepts proposed for consideration by the Transition Council were statutorily permitted.

2. High-Level Jurisdictional Scan

A brief jurisdictional scan of veterinary regulators (CAN, USA, UK) was conducted to determine the most common approaches to the VCPR.

In Canada, all jurisdictions currently require that a VCPR be established by a veterinarian. In New Brunswick and Manitoba, there has been some use of the term “veterinary-client-patient relationship” in policy. However, a veterinarian is still required to establish the relationship.

It is important to note that in these jurisdictions, the VCPR is also tied to the performance of physical examination or premise visit which is not currently a requirement in Ontario. Veterinary technicians in these jurisdictions are also required to work under the supervision and delegation of a veterinarian.

In the United States, all jurisdictions currently require that a VCPR be established by a veterinarian. The American Association of Veterinary State Boards (AAVSB) models this requirement in its Model Regulation on the Establishment and Maintenance of a Veterinarian-Client-Patient Relationship, [found here](#). The Model Regulation also recognizes that once established, a VCPR is maintained by all licensed members associated with the accredited veterinary facility. All jurisdictions in the United States require veterinary technicians to work under the supervision and delegation of a veterinarian.

In the United Kingdom, the term “under care of” is used to refer to the relationship that is formed between a veterinary surgeon (veterinarian) and their client. This relationship is expected to be formed by a veterinary surgeon and is established when the veterinary surgeon accepts a client’s offer for professional responsibility over it. A physical examination or premise visit is not required for a veterinary surgeon to assume care over an animal. A veterinary surgeon is required to provide 24-hour care services to any animal that they have taken under their care. A veterinary surgeon is permitted to rely on their veterinary team (including veterinary nurses) or arrangements with other veterinary surgeons to provide



veterinary services. Veterinary nurses are required to work under the delegation and supervision of a veterinary surgeon.

3. Conversation with the College's Legal Team

The draft concept contained in this cover sheet was preliminary shared with Julie Maciura, a member of the College's external legal team. Based on her review, Ms. Maciura advised that the draft concept was sound and legally defensible. She also advised that potential clients who were first interacting with a veterinary team at an accredited veterinary facility would assume that a VCPR had been established once veterinary services were offered or performed from the facility. She noted that the likelihood of this assumption was especially high in circumstances where a veterinary technician member may be performing veterinary services through their own initiation or under a veterinarian's order.

Concept

A draft concept (attached to this cover sheet as Appendix "B") has been developed to support Transition Council's work related to the VCPR. In particular, the draft concept speaks to the proposed inclusion of:

1. Separate Regulatory Section for VCPR

Regulation 1093 under the *Veterinarians Act* currently contains one regulatory section that outlines both the VCPR and informed client consent. As both the VCPR and informed client consent are essential to the safe and accountable practice of clinical veterinary medicine, the draft concept proposes the VCPR be allotted its own specific section within the regulation to allow for clarity surrounding its specific requirements.

2. Enhanced Recognition that the VCPR is Maintained by the Veterinary Team Working Through an Accredited Veterinary Facility

The practice of veterinary medicine in Ontario has evolved to recognize that once established, a VCPR is maintained by the entire veterinary team associated with an accredited veterinary facility. The draft concept proposes that this approach be formally recognized within regulation to ensure clarity for both the public and the profession.

3. Both Types of Members Permitted to Establish a VCPR

In recognition of the VCPR's association with the veterinary team at an accredited veterinary facility, the draft concept proposes that both types of members be permitted to establish a VCPR. All VCPRs would continue to be required to be formed through an accredited veterinary facility and in accordance with facility policies established by the Veterinary Facility Director.



4. Connection Between the VCPR and After-Hours Veterinary Care

As the provision of after-hours veterinary care by veterinarian members remains one of the core public expectations related to the delivery of clinical veterinary medicine, the draft concept proposes that regulation language be developed that clearly outlines its connection to the VCPR. With this recognition, the draft concept also proposes that a veterinary technician member only be permitted to establish a VCPR if there is a veterinarian member(s) on the veterinary team associated with the accredited veterinary facility who then assumes responsibility for the delivery of after-hours veterinary care services as well as management of any adverse reactions.

5. Ongoing VCPR Requirements

The draft concept proposes that the current VCPR requirements contained in Regulation 1093 under the *Veterinarians Act* carry forward including that a member must be retained by the owner or authorized representative of the animal(s) or group of animals, that the member must advise that they will only provide services in accordance with the standards of practice for the profession, and that an agreement is reached between the member and potential client regarding the scope of services to be provided.

6. Enhanced Recognition of Client Needs

In addition to the current requirements outlined in Regulation 1093, the draft concept proposes that language be added that requires the member to consider the specific needs of the client when establishing a VCPR. This is proposed in recognition of the importance of spectrum of care conversations including those related to the needs of specific groups, such as Indigenous communities.

7. Continuation of Regulatory Exemptions

In recognition of the different situations and circumstances in which members may be practising clinical veterinary medicine, the draft concept also proposes that the current exemptions in Section 18 (3) of Regulation 1093 made under the *Veterinarians Act* related to the VCPR continue under the new regulatory framework. The draft concept also proposes the inclusion of other regulatory exemptions previously discussed by Transition Council, including members working under another piece of federal or provincial legislation.

Note on Proposed Approach

Additional details related to the VCPR, including how it is maintained and discontinued, will be able to be developed through College Policy.

The term “veterinarian-client-patient relationship” will also be able to be revisited through College Policy as it is not currently outlined in either the *Veterinarians Act* or the *Veterinary Professionals Act, 2024*.



Discussion

The draft regulatory concept and associated draft language related to the VCPR is now 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 the following questions:

- Is there anything unclear or missing?
- Does the draft concept seem logical?
- Does the draft concept raise any concerns?
- Does the draft concept raise any thoughts or considerations related to unintended consequences?

Attachments

1. Appendix A - Relevant Legislation, Regulation, By-Law and Policy Sections – VCPR
2. Appendix B - Draft Concept – VCPR.

Veterinarian-Client-Patient Relationship (VCPR)

Relevant Sections of Legislation, Regulation, By-Law, and Policy

Current Framework Under the *Veterinarians Act*

7 (1) Subject to the approval of the Lieutenant Governor in Council and with prior review by the Minister, the Council may make regulations with respect to the following matters:

8. Prescribing and governing standards of practice for the profession.

Current Framework Under Regulation 1093

18. (1) A member shall comply with the standards of practice of the profession in the performance of veterinary services. O. Reg. 233/15, s. 12.

(2) A member shall not provide veterinary services in respect of an animal unless the member has,

(a) been retained by the owner of the animal, an authorized representative of the owner or an individual who the member reasonably determines is acting in the interest of the animal;

(b) advised the client that the member will only provide services in accordance with the standards of practice of the profession;

(c) reached an agreement with the client as to the scope of the services to be provided by the member; and

(d) obtained the consent of the client for each service to be provided. O. Reg. 233/15, s. 12.

(3) Subsection (2) does not apply if,

(a) a member, acting reasonably, determines that it is an emergency and that the animal requires immediate veterinary services;

(b) a member is an employee or contractor of the Crown in right of Canada or the Crown in right of Ontario and is providing veterinary services as part of that employment or contractual relationship;

(c) a member is providing veterinary services in or from a temporary facility;

(d) a member is providing veterinary services that are permitted or required under the *Dog Owners' Liability Act*, the *Animals for Research Act*, the *Provincial Animal Welfare Services Act, 2019*, the *Animal Health Act, 2009* or under any other Act except for the *Veterinarians Act*; or

(e) a member is retained or employed by a person other than an animal's owner to conduct an independent examination of the animal and report on the animal's health to that person. O. Reg. 233/15, s. 12; O. Reg. 260/22, s. 3.

- 20.** (1) A member is responsible for providing reasonably prompt services outside of regular practice hours if the services are medically necessary for animals that he or she has recently treated or that he or she treats regularly. R.R.O. 1990, Reg. 1093, s. 20 (1).
- (2) The services required under subsection (1) may be provided by the member or an associate or by referral to another member who has agreed to cover the referring member's practice. R.R.O. 1990, Reg. 1093, s. 20 (2).
- (3) If a member provides services under subsection (1) outside of regular practice hours by referring an animal to an emergency clinic, the member is responsible for promptly continuing to provide medically necessary services to the animal after discharge from the emergency clinic until the services are no longer required or until the client has had a reasonable opportunity to arrange for the services of another member. R.R.O. 1990, Reg. 1093, s. 20 (3).
- (4) A member shall inform each of his or her clients as to how they can access services outside of the member's regular practice hours. O. Reg. 233/15, s. 14.
- (5) If a member changes the arrangements for accessing services outside of the member's regular practice hours, he or she shall promptly inform his or her clients of the changes. O. Reg. 233/15, s. 14.
- (6) The member shall keep records of every time information is provided under subsections (4) and (5). O. Reg. 233/15, s. 14.
- (7) If an animal is to be left in a veterinary facility after regular practice hours, the member treating the animal shall inform the client of supervision arrangements for that animal. O. Reg. 233/15, s. 14.
- (8) This section does not apply to a member who provides veterinary services in or from a temporary facility unless compliance with this section is required as a condition to the certificate of accreditation of the temporary facility. O. Reg. 233/15, s. 14.

Current College Policy

[Professional Practice Standard: Establishing, Maintaining, and Discontinuing a Veterinarian-Client-Patient Relationship \(VCPR\)](#)

Future Framework under the *Veterinary Professionals Act, 2024*

93 (1) Subject to the approval of the Lieutenant Governor in Council, the Council may make regulations,

23. prescribing and governing standards of practice of veterinary medicine and standards for veterinary facilities, including respecting standards for the use of technology in the practice of veterinary medicine, when technologies may be used and the manner and circumstances in which they may be used.

97 (1) The Council may establish,
(b) standards for the practice of veterinary medicine that must be met and maintained by members.

Concept Chart -
Veterinarian-Client-Patient Relationship (VCPR)

Section	Primary Concepts Confirmed by 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>Veterinarian-Client-Patient Relationship (VCPR)</p>	<p>General</p> <p>Transition Council proposes the development of regulation language related to the veterinarian-client-patient relationship (VCPR) in accordance with Section 93 (1) 23 of the <i>Veterinary Professionals Act, 2024</i>.</p> <p>This regulation language will apply to both veterinarians and veterinary technicians.</p> <p>Purpose</p> <p>The College of Veterinary Professionals of Ontario (CVPO) will be responsible for providing overarching requirements for the practice of veterinary medicine in Ontario.</p> <p>Overview</p> <p>The VCPR is the foundation upon which the delivery of clinical veterinary medicine is based.</p>	<p>Additional details related to the VCPR, including how it is maintained and discontinued, will be able to be developed through College Policy.</p> <p>The term “veterinarian-client-patient relationship” will also be able to be revisited through College Policy as it is not currently outlined in either the <i>Veterinarians Act</i> or the <i>Veterinary Professionals Act, 2024</i>.</p>	<p>Transition Council confirmed the regulatory concept related to the VCPR in January 2025.</p>

Section	Primary Concepts Confirmed by Council	Additional Information	Date of Confirmation
	<p>Separate Regulatory Section for VCPR</p> <p>Regulation 1093 under the <i>Veterinarians Act</i> currently contains one regulatory section that outlines both the veterinarian-client-patient relationship (VCPR) and informed client consent. As both the VCPR and ICC are essential to the safe and accountable practice of clinical veterinary medicine, Transition Council proposes that the VCPR be allocated its own specific section within regulation to allow for clarity surrounding its specific requirements.</p> <p>Enhanced Recognition that the VCPR is Maintained by the Veterinary Team Working Through an Accredited Facility</p> <p>The practice of veterinary medicine in Ontario has evolved to recognize that once established, a VCPR by the entire veterinary team associated with an accredited veterinary facility. Transition Council proposes the development of regulation language that formalizes this approach to ensure clarity for both the public and the profession.</p> <p>Both Types of Members Permitted to Establish a VCPR</p> <p>In recognition of the VCPR's association with the veterinary team at an accredited facility, Transition Council proposes the development of regulation language that permits both types of members to establish a VCPR. VCPRs would be required to be formed through an accredited veterinary facility and in accordance with facility policies established by the Veterinary Facility Director.</p>		

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	<p>Connection Between the VCPR and After-Hours Veterinary Care</p> <p>As the provision of after-hours veterinary care by veterinarian members remains one of the core public expectations related to the delivery of clinical veterinary medicine, Transition Council proposes the development of regulation language that clearly outlines its connection to the VCPR. With this recognition, the Transition Council also proposes that a veterinary technician member only be permitted to establish a VCPR if there is a veterinarian member(s) on the veterinary team associated with the accredited veterinary facility who then assumes responsibility for the delivery of after-hours veterinary care services as well as management of any adverse reactions.</p> <p>Ongoing VCPR Requirements</p> <p>Transition Council proposes the development of regulation language that carries forward the current VCPR requirements contained in Regulation 1093 under the <i>Veterinarians Act</i> including that a member must be retained by the owner or authorized representative of the animal(s) or group of animals, that the member must advise that they will only provide services in accordance with the standards of practice for the profession, and that an agreement is reached between the member and potential client regarding the scope of services to be provided.</p>		

Section	Primary Concepts Confirmed by Council	Additional Information	Date of Confirmation
	<p>Enhanced Recognition of Client Needs</p> <p>In addition to the current requirements outlined in Regulation 1093, Transition Council proposes the development of regulation language that requires the member to consider the specific needs of the client when establishing a VCPR. This is proposed in recognition of the importance of spectrum of care conversations including those related to the needs of specific groups, such as Indigenous communities.</p> <p>Continuation of Regulatory Exemptions</p> <p>In recognition of the different situations and circumstances in which members may be practising clinical veterinary medicine, Transition Council proposes the development of regulation language that carries forward current exemptions in Section 18 (3) of Regulation 1093 made under the <i>Veterinarians Act</i> related to the VCPR continue under the new regulatory framework. Transition Council also proposes the inclusion of regulatory exemptions for members working under another piece of federal or provincial legislation.</p>		