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| College of Veterinarians of Ontario2106 Gordon Street Guelph, Ontario N1L 1G6Registrar’s E-mail: jrobinson@cvo.orgPresident’s E-mail: president@cvo.org Fax: 519-824-6497 or 1-888-662-9479 | The Honourable Jeff Leal, Minister of Agriculture, Food and Rural AffairsMinistry of Agriculture, Food and Rural Affairs1 Stone Road West, Guelph, ON N1G 4Y2Ministry E-mail: about.omafra@ontario.ca Minister E-mail: minister.omafra@ontario.caFax: 519-826-4335 |

Dear College of Veterinarians of Ontario & The Ontario Minister of Agriculture,

I am concerned with the proposed amendments to the Veterinarians Act, and my future ability to easily and affordably access rehabilitation services for my animal. My animal has benefitted from the services provided by a physical therapist trained in animal rehabilitation. My top areas of concern regarding the Proposed list of ‘Authorized Activities’ within the proposed Veterinarians Act are as follows:

1. Regarding “Making or communicating a diagnosis identifying a disease, disorder, dysfunction or condition as the cause of an animal’s signs and presentation”.

The physical therapist that has seen my animal provided a thorough physical evaluation and was able to convey to me what she felt was causing my animal pain or problems. I understand that the information she provided to me was different than that of a veterinary medical diagnosis but was specific to her findings. The information she communicated helped me to understand the problem my animal was having, why she selected the treatments my animal received, and why she prescribed the home exercises or therapies she did. Furthermore, she communicated those findings and her diagnosis to my veterinarian, which both my veterinarian and I appreciated. I understand that this is no different than in the human field of medicine, where a physical therapist is legally allowed to communicate a diagnosis as the cause of a person’s symptoms. I would expect nothing less for my animal.

1. Regarding “Performing a procedure on tissue below the dermis”

Acupuncture and Dry Needling are techniques utilized by my animal rehabilitation physiotherapist. She has been trained to use these techniques on humans and has applied them to my animal. I was impressed with her knowledge and skills in this area. I am concerned that removing the right for my physical therapist to perform a needling technique on my animal, or to mandate that she seek permission and directive from a veterinarian to utilize these techniques, will have the consequence of reducing my access to these services; thus increasing the time delay between assessment and treatment for conditions where needling would be appropriate, and increasing the healthcare cost burden if I needed to have an additional veterinary consult before each needling treatment or if my veterinarians insisted that I to go elsewhere for acupuncture / dry needling services.

Additionally, the wording, “procedure on tissue below the dermis’ is confusing. Any technique delivered to the skin (from petting to massage or any other manual therapy) will impact tissues below the surface. Nerve endings in the hair follicles are impacted by petting, manual therapies (i.e. massage, myofascial release, or mobilizations) affect muscles, nerves, fascia, blood vessels, bone, and joints, all below the dermis, all below the dermis. Therapeutic Exercise is another application of a procedure to impact tissues below the dermis. Of additional concern, even providing first aid or CPR is done to impact tissues below the dermis. I am concerned about the unintended consequences of this restrictive language within the proposed Act.

1. Regarding “Applying or ordering the application of a form of energy prescribed by the regulations under this Act”

The physical therapist I have used to provide rehabilitation to my animal was very knowledgeable and skilled in the application of therapeutic modalities. From her explanation, each of the modalities used provides a transference of energy (light, sound, electrical, pressure, etc.). To include the “Application of Energy” as an Authorized Activity under the proposed Veterinarians Act, would mean that every time my animal’s therapist wanted to use a modality to treat, she would need to have my veterinarian authorize the use of each and every modality. My veterinarian does not have training in animal rehabilitation or therapeutic modalities used in physical therapy practice. As such, I would not expect him/her to know when such tools were appropriate and be able to delegate this responsibility. Requiring a physical therapist to seek veterinary permission and ‘directive’ in order to utilize energy devices / therapeutic modalities will have the consequence of reducing access to these services and skilled practitioners, increasing the time delay between assessment and treatment, and/or exponentially increasing the healthcare cost burden for me, the pet owner (should I be required to take my animal for an additional veterinary consult).

Additionally, the term ‘energy’ is far too broadly encompassing. ‘Energy’ is a term that encompasses many things. The sun provides energy. Walking an animal in the sunshine or letting him/her outside during daylight involves the application of energy via photo-stimulation of cells. Providing my dog with food and water is to apply energy to sustain its very existence. Petting or grooming transfers energy. Applying a hot pack / cold pack is a method of delivering energy. Energy healing (i.e. Reiki, Qi Gong, Healing Touch, etc.) are energy medicine practices which most veterinarians do not perform or understand. One could argue that any ‘care’ provided to an animal is an application of energy in one form or another. I am concerned about this language impacting areas of day to day animal care beyond what would be deemed veterinary medicine.

Thank you for taking the time to read my letter and hopefully address my concerns by way of amending the proposed language in the new Veterinarians Act.

Sincerely,

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