



# Veterinary Practice Owners Association of Ontario

*The Voice Of The Veterinarian Owned Practice...For A Stronger Profession And Excellent Care.*

2078 Upper Middle Road E, Oakville Ontario L6H 7G5

December 23, 2016

Marc Marin, DVM

President

College of Veterinarians of Ontario

2106 Gordon Street

Guelph, ON N1L 1G6

Dear Dr. Marin:

## **Re: Proposed Facility Accreditation Model**

The proposed facility accreditation model is the latest suggestion from the College of Veterinarians of Ontario that is meant to inspire confidence in the profession. After reviewing the proposed changes, it is alarming how onerous the practice of veterinary medicine is becoming. There are so many pressures faced by an individual practice owner that there is less time to focus on patient care.

From a financial standpoint, veterinary practices have seen a steady decline in the growth of their practices over the past seven years. We may associate this decline with many reasons like a slow growth economy, a declining pet owner demographic, the rise in the number of new veterinary clinics, increased competition from low-cost veterinary clinics, online pharmacies and from (non-means tested) rabies and sterilization clinics. As such, practice owners have had to focus considerable attention on ways to maintain growth like increasing the perception of value, creating online pet stores, health plans and changing how we book appointments. All of these things are a distraction, especially for a one veterinarian practice, from focusing on patient care. We need to allocate staff and resources just to make sure we have clients coming through the door.

From a provincial workplace standpoint, veterinary practices have seen a steady increase in regulatory requirements that need to be met. We have seen changes to the *Occupational Health and Safety Act* that includes violence and harassment in the workplace and *Accessibility for Ontarians with Disabilities Act*. And again, we need to allocate staff and resources to ensure we are meeting the legislative requirements.

Certainly, this is all par for the course of running a veterinary clinic. Now suddenly there are problems with the accreditation process that served the public and profession well for years. Veterinarians now need to have yearly self assessments and tri annual accreditation. For a single veterinarian practice owner, this proposed model simply represents more financial and bureaucratic red tape that gets in the way of patient care.

Concerns with the new proposal are:

- 1) Under the new accreditation proposal Workplace Health and Safety requirements will also be under the umbrella of the inspection process. This process that is now enforced under *Occupational Health and Safety Act* by the Ministry of Labour now must be double checked and enforced by the accreditation inspector under the *Veterinarians Act*. The addition of Workplace Health and Safety should not be a part the accreditation process.

- 2) The cost of running a practice continually increases and now members must pay a new annual fee for running this new costly, yet to be disclosed amount, yearly review. This new model now represents a new financial burden. Any new costs must be presented to members prior to consideration. We believe the current five-year accreditation period and fee structure is working well.
- 3) The idea that random inspections will prevent perceived activities such as the sharing of equipment or staging inspections is offensive! The mere implication suggests the College believes its members are intentionally trying to deceive the accreditation process. Just when you thought new yearly self assessments would prevent such perceived violations we will never truly meet the accreditation requirements because every veterinarian is trying to deceive the accreditation inspector. Truly, how random will these inspections be? Let us imagine a critical letter that is written about the College of the Veterinarians of Ontario, suddenly the author of that letter is now subject to a random inspection. Let us say a complaint is lodged against a member suddenly that member is now subject to a random inspection. Are these inspections random or are they at the whim of the College? There is no mention in the new accreditation proposal on the criteria that will make this process random. Will it be blind and at arm's length from the registrar and executive committees? A random inspection by definition is an uninvited warrantless invasion of private property and it must be dropped from this proposal.
- 4) Having a licensed veterinarian lead the inspection will provide a level of expertise and credibility to the inspection process but it may also create bias. The veterinary community is small and as such friendships and resentments may interfere with the impartiality of the inspection. The inspector must be instructed to recuse themselves to another inspector if any conflict exists. The clinic being inspected should be allowed to choose a different inspector if they believe a conflict of interest exists. Also, should a swine veterinarian be allowed to accredit and inspect a companion animal hospital? To improve credibility, we should only have companion animal veterinarians inspecting companion animal facilities? These concerns need to be addressed in future proposals.
- 5) This proposal only briefly touches on essential equipment and there is very little mention of acceptable standards of care as being a component of the accreditation and renewal process. There is no mention in this proposal as to how and why certain essential equipment, like dental radiography, can be easily added to the accreditation process. This process must be flexible for change. Future proposals must mention how veterinary equipment, supplies and standards of care are easily included or removed from the facility requirements.

Thank you again for the chance to comment on the proposed document. We would appreciate a written response to our concerns and that these concerns be discussed at the next council meeting.

Sincerely,

James McCleary, DVM

President