December 5, 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

Thank you for the opportunity to comment on the consultation document regarding the Proposed Facility Accreditation Model.

The OVMA Board of Directors reviewed the consultation document at its November meeting. Conceptually, the Board supported the move to a new accreditation model that focuses on outcomes and adaptability to better meet the needs of veterinary practices and clients in the future. The Board was also supportive of the move to an adaptable model that only requires one accreditation per practice.

However, the Board had serious concerns regarding the proposed inspection intervals. The College is proposing moving from the current five-year re-accreditation cycle to a three-year inspection cycle, with the addition of annual self-assessments and random inspections between the regular re-accreditation inspections. In the absence of data that suggests that Ontario veterinary practices are frequently significantly deficient, OVMA is not satisfied that there is a compelling reason to reduce the inspection interval by 40%, with the resulting increase in costs to the College, veterinarians and, ultimately, the client. OVMA therefore recommends that re-accreditations continue to take place every five years, until there is a demonstrable need for a shorter cycle.

The Board also had questions and concerns regarding the proposed random inspections. While the consultation document does not specifically refer to such inspections as “surprise” inspections, the fact that they will be conducted with limited notification suggests that they are intended to discourage practices from sharing equipment, etc. in order to pass the inspection. The Board also questioned the need to randomly inspect veterinary practices that had passed their previous inspection with flying colours. If random inspections are to be added to the regular inspection cycle, they should focus on facilities that were found to be deficient upon previous inspections, not facilities that passed without concern.

The proposed self-assessment cannot be properly evaluated without additional information. Specifically, what would the cost of the self-assessment be? How much time it would require to complete? Would the facility director be required to submit the self-assessment to the College? Would the self-assessment be reviewed by the CVO inspector as part of the re-accreditation process?
The Board also had questions as to what would happen if there were changes to a clinic’s scope. Would a whole new inspection be required? Would the practice have to close until the re-accreditation takes place?

Finally, the Board was concerned about potential unintended consequences should the College move towards some form of restricted licensure in the future. Would a clinic that limits its scope on its accreditation certificate inadvertently limit individual practitioners’ ability to practice as they saw fit in the future?

Thank you once again for the opportunity to comment on the consultation document. We hope this input is helpful. If you have any questions regarding this response, please contact OVMA’s Manager of Government and External Relations, John Stevens at jstevens@ovma.org or 800.670.1702, ext. 24.

Sincerely,

Christine Coghill, DVM
President