

Service Dogs in Canada - An Evolving Landscape

THIS PAPER INCLUDES:

BASIC TERMINOLOGIES, A PROPOSED END-USER/CONSUMER CHECKLIST, STANDARDS & PROBABLE NEXT STEP

Words Matter! Terminologies Pertaining to Service Dogs in Canada

Using certain words interchangeably routinely causes a great deal of confusion and avoidable conflict. This is particularly true in the realm of service dogs. The enclosed generic descriptions are intended to provide some clarity around a few common terms to enhance understanding within this complex environment.

Accreditation (Organizational):

The current service-dog scene encompasses a combination of business models like sole proprietorships, for-profits, non-profits, franchises, and registered charities. Some may be members of an umbrella organization, while others prefer to work independently. The term 'accreditation' in this context is used to indicate that an organization is self-accredited. In other words, accreditation in the service dog realm currently does not refer to a third party contractual or governmental accreditation through regulatory requirements, but rather, an internal process that suggests a degree of autonomy that determines an organization's benchmark for brand performance.

Service Dog Teams' (The handler and the service dog) Certification:

Teams that are trained by the producers whereby an ID Card is issued to verify that the team is ready to work as a team in public spaces.

Producers Certifications:

There are presently no academic or governmental regulations overseeing the qualifications of producers (service dog trainers). Trainers come from a variety of backgrounds with expertise that may, or may not initially encompass training a service dog team or working with persons with disabilities, trauma survivors, etc. There are however a few organizations that assert various requirements in accordance with their respective models and positioning within the marketplace.

Standards:

The term standards means different things to different people. Being clear about this term within a particular context is not only good business it helps to prevent businesses from misrepresenting themselves and their services. With this in mind, the Foundation's Service Dogs in Canada page provides a diagram that highlights three common references to and differences concerning standardization and their respective terms and purposes. In this context, those declaring the use of standards are referring to 'private company standards'. There are no standards relating to service dog teams or anything related within Canada's National Standardization Network (formerly known as National Standards System) or within the International Organization for Standardization's (ISO) framework.

Since there is no Canadian Industry/Trade Association there is no nationally recognized (mutually agreed upon) benchmarks or standards among competitors within this market.

What is a National Standard of Canada (NSC)?

The designation of a standard as a NSC indicates that it is recognized as the official Canadian standard in a particular subject area or topic. Before a standard can become a national standard, it must be approved by Standards Council of Canada (SCC). Standards that include the prefix CAN as part of their reference number have been designated an NSC. SCC-accredited Standards Development Organizations that have obtained the self-declaration status may publish National Standards of Canada without seeking SCC's approval of NSCs.

To be approved, an NSC has to meet certain requirements, including that it be:

- * developed by consensus from a balanced committee of stakeholders,
- * subjected to public scrutiny,
- * published in both official languages,
- * consistent with or incorporate existing international and pertinent foreign standards, and,
- * not a barrier to trade.

NSCs may be developed in Canada or adopted, with or without changes, from international standards. For more information, see Requirements & Guidance: Approval of National Standards of Canada Designation. An explanation of the self-declaration status and access to the revised 2017 Requirements & Guidance for Standards Development Organizations (SDOs) can be found at <https://www.scc.ca/en/accreditation/standards>.

To access the Foundation's Development of a National Voluntary Standard of Canada for Service Dog Teams FAQ's, please click on the underlined link.

Note: The Notice of Intent (NOI) to develop C**/CGSB-193.1 as a National Standard of Canada was withdrawn on 2018-03-27 as requested by the responsible SDO (NOI originally published on 2015-01-20). Read more <https://www.scc.ca/en/standards/notices-of-intent/cgsb/service-dogs>

Whose who?

Consumers, end-users, family members, donors, grant makers, sponsors, regulators, the private sector, voluntary sector, other stakeholders, and the public at large are at a disadvantage in terms of trying to understand whose who and what's what? In order to inform this process and fill these gaps there was an attempt to develop a National Voluntary Standard of Canada with and for Service Dog Teams to overcome the accessibility and attitudinal barriers that make service dog teams vulnerable to exploitation. Long-standing unresolved industry and systemic issues within this market took on a life of their own during this endeavor resulting in the termination of the project. Hence, the status-quo remains intact to the detriment of those who need and already have service dogs.

Quote:

"More than ever, it is vital that an infrastructure be in place to facilitate the growth of a vibrant open market to sustain service excellence." The Canadian Foundation for Animal-Assisted Support Services (CFAS)

Choosing a Producer (Service Providers)

A generic checklist is enclosed in response to many FAQ's people have when navigating this environment. While the list is not exhaustive, it does provide food for thought (stop and ponder). Shopping around and comparing responses is advisable.

Q1: How long has your organization or business existed?

A: The response may be two-fold the first being the time frame and the second part is to establish their level of expertise and experience. For example, someone may have worked as a pet or service dog trainer for 20 years, but then decided to free-lance to fill a niche.

Q2: What are the qualifications for trainers that work with persons with a disability to train a service dog team?

A: If the response is that the person or trainers of an organization are certified, ask them to elaborate to find out where they got their training and certification, whether they are required to pursue ongoing professional development, how many teams have they successfully trained and certified, who are they accountable to, and if they have had any disability-related training and vulnerable sector screening to ensure the safety of their clients. If the response is that they are accredited, reiterate that you want to know what the trainer qualifications are so as not to confuse a trainer's certification and/or qualifying credentials with the accreditation of an organization.

Q3: Do you work with an interdisciplinary team to meet the needs of your clients and if not, will you if your client makes this request?

A: If yes, then ask them to provide you with specifics. If not, ask if they are open to doing so.

Q4: To be considered as a candidate for your services or program are your clients required to raise funds?

A: This response may vary depending upon the business model. For example, some producers work through an insurance company and or charge for their services outright, which means the person or family, may be expected to solicit funding from elsewhere. If the organization is a registered charity, a client need not fund raise to acquire a service dog. If accepted into a registered charity program the agreement between the client and the service provider (producer) should have no such requirement whatsoever because donated funds are expected to be used for this purpose. Fundraising may be a requirement if the trainer or for-profit entity is providing the services. Be aware and take your time to understand verbal and written agreements before committing. There is nothing wrong with helping to fundraise for a charity, but the person, not the charity, needs to make this determination if they so choose.

Q5: Do I have to tell my story or let the organization use my photo to solicit funding?

A: No, do not do anything you are not comfortable doing.

Q6: Can I train my own dog?

A: Selecting and training a service dog is complex, therefore, it is important to remember that not all dogs are suited to be a service dog. The handler as well as the dog need to be trained in order to work as a team.

Q7: Do you (independent trainer) or does your organization screen staff and volunteers?

A: In either case, screening is necessary, including confirmation of a Vulnerable Sector Check.

Q8: Is your organization a registered charity, non-profit organization, or a for-profit venture?

A: Producers deliver their services in different ways, but all must adhere to applicable legislation and regulations, as appropriate. Therefore, relevant questions would be whether the organization or in the case of an independent trainer can demonstrate awareness of and a commitment to operate accordingly; accountability will depend upon relevant legislation and whom else the organization, business, or trainer works with. Transparency is necessary.

Q9: How many service dog teams do you or your organization graduate annually?

A: In order to foster confidence and transparency producers need to provide this basic information to convey the value (public benefit) they are creating with their resources and expertise.

Q10: Do you have a privacy policy that is referenced within your application process?

A: Privacy is key; therefore, knowing in advance what information is required and how it will be used is essential.

Q11: How do you determine who qualifies for your program?

A: Every trainer, organization, and business has their own application process, or should have, in order to determine eligibility to access their services. Choosing to self-train a service dog is becoming common practice due to long waiting lists or not meeting a given application criteria. In any case, information from reputable sources, resources, and supports are crucial in order to proceed with assurance.

Q12: Do you provide follow-up, aftercare, and resources to ensure the best possible outcomes?

A: Responses will vary depending upon the type and size of the business and its available resources. Regardless aftercare and ongoing training are important factors to ensure continued success and the welfare of the canine.

Q13: Is there a waiting list?

A: Some, not all, producers have waiting lists. It may be fitting to apply with more than one producer in order to speed up the process.

Q14: What happens with dogs that do not accomplish their specific training?

A: Canines that do not graduate are sometimes adopted by members of the public or go on to become a service dog in an area that best suits the dogs capabilities and temperament.

Q15: Do producers have any breed restrictions?

A: Breed restrictions are governed by jurisdictional legislation; however, some organizations have their own breeding programs that reflect their specific preferences.

Q16: Does a third party accreditation body recognize your organization/business?

A: There are currently no third-party service dog accreditation programs or bodies. As a result, self-accreditation (self-declaration) is a common practice within this emergent industry.

Co-creating a winning strategy today is a sound investment in tomorrow.

Minimizing risk by learning from the past and by working together for mutual success would be a reasonable next step in the evolution of the service dog industry. To explore this concept further please ponder the enclosed Trade Association Best Practices and the potential impact on end-users, producers, the government, and other stakeholders.

What is a trade association?

A trade association, also known as an industry trade group, business association, sector association or industry body, is an organization founded and funded by businesses that operate in a specific area of business that come together for the protection and advancement of their common interests.

Source: https://en.wikipedia.org/wiki/Trade_association & <https://www.merriam-webster.com/dictionary/trade%20association>

Trade Association "Do's and Don'ts"

The following "Do's and Don'ts" can help to identify the characteristics of a Trade Association and best practices sanctioned by Canada's Competition Act.

Do's

- * Do establish an effective compliance program and, where practicable, appoint a compliance officer;
- * Do exercise care when collecting and sharing competitively sensitive information within the association. Use a third party to collect the information and have it disseminated in aggregated form so that it cannot be attributed to any competitor;
- * Do ensure that measures are in place to prevent the disclosure of competitively sensitive information to or between individual association members;
- * Do ensure that association meetings have agendas and that minutes accurately reflect attendance and discussions;
- * Do ensure that attendees use caution during association meetings.

- * If improper discussions arise, attendees should leave the meeting and have their departure noted in the minutes. The incident should be reported to association executives and/or legal counsel and appropriate action should be taken;
- * Do allow all members to attend annual and other general meetings so as not to exclude a specific firm or category of the association's membership;
- * Do find alternatives to recommended fee guidelines to provide information to the public or association members on prices;
- * Do ensure that the exercise of standard setting and other statutorily granted self regulatory powers is appropriately related to the regulatory mandate established by legislation;
- * Do ensure that rules, codes of conduct or standards (rules) include a clear statement of objectives, expectations and responsibilities, as well as a transparent dispute resolution mechanism; and
- * Do ensure open consultations in the development of any rules.

Trade Association "Don'ts"

- * Don't engage in communications at association meetings or social events about competitively sensitive information. Private meetings between competitors under the pretext of association meetings should be discouraged;
- * Don't use unreasonable disciplinary measures to coerce members to provide information or data for information sharing purposes;
- * Don't establish arbitrary criteria for membership that will exclude a competitor or category of competitors from membership in the association;
- * Don't impose sanctions or discriminate against members that do not adhere to rules with respect to competitively important considerations;
- * Don't create a false impression that lower prices or fees are indicators of lower quality services;
- * Don't use rules to establish prices, mandate levels or types of services, restrict advertising, or exclude viable competitors from the market;
- * Don't use standard-setting to artificially provide some competitors with a competitive advantage over others, including firms with the potential to enter the market; and
- * Don't make materially false or misleading representations to the public promoting the business interests of the association's members.

Source: Competition Bureau
 Trade Associations and the Competition Act
<http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/03691.html>

Probable Next Step:
 Explore the feasibility of establishing a national service dog's industry association.

Managing Risk - Tools of the Trade

Ensuring truth in advertising
 Promoting truth in advertising by discouraging deceptive business practices and how you can make informed choices. Read more
http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/h_00529.html

Preventing abuse of market power.

Ensuring dominant companies do not exploit their market power or engage in acts that lessen competition. Read more

http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/h_02758.html

Reviewing mergers

Conducting reviews of business mergers to ensure they do not substantially lessen or prevent competition. Read more

http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/h_00114.html

Advocating for greater competition

Promoting benefits of a competitive and innovative marketplace, in Canada and abroad, for businesses and consumers. Read more

http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/h_03557.html

International efforts

Addressing, preventing, and prosecuting anti-competitive conduct that crosses borders. Read more

http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/h_00128.html

Benefits of Competition

Promoting competition would foster new and exciting opportunities to respond to and expand this burgeoning sector's ability to meet the current demands, while preparing for the future. Working together would pave the way to collaborating with a cross-section of organizations, communities, sectors, and disciplines to enhance service delivery. Some of the anticipated results would encompass shorter wait times, quality assurance, and end-users/consumer satisfaction.

While the term 'competition' may have a negative connotation in some circles it is good for the economy, sector development (innovation), establishing credibility, informing stakeholders, donors, sponsors, grant makers, promoting job creation, and apprenticeship programs. In summation, 'competition' that is managed well positively affects the Triple Bottom Line (TBL).

TBL Characteristics:

Triple bottom line is an accounting framework with three parts: social, environmental and financial. Some organizations have adopted the TBL framework to evaluate their performance in a broader perspective to create greater business value. Source: Wikipedia

About Us

The Canadian Foundation for Animal-Assisted Support Services (CFAS) endeavours to inspire and sustain the innovation, coordination, and integration of exceptional Animal-Assisted Services within Canada's healthcare, social services, justice, and corrections sectors in order to establish and help sustain One Health for People, Pets, and Partners (PPP). One Health for PPP is a Canadian Foundation for Animal-Assisted Support Services (CFAS) initiative that unites and engages individuals, communities, organizations, disciplines and sectors in order to co-create our collective desired future. Health in this context includes all

aspects of individual and collective well-being grounded in informed decision-making as active and engaged members of society.

Contact Us:

1010 Polytek St., Unit 14,

Ottawa, Ontario, K1J 9H9

Email: servicedogs@cf4aass.org ?

Website URL: www.cf4aass.org

Facebook: <https://www.facebook.com/OneHealthforPeoplePetsandPartners>

Business Number: 870159043RR0001