

# *A Canadian Service Dog Industry & Marketplace Study*

## *Unleashing Potential Phase I*



**November 8, 2020**



The Canadian Foundation  
for Animal Assisted Support Services

[www.cf4aass.org](http://www.cf4aass.org)



## **We Value**

- Accountability
- Candor
- Compassion
- Collaboration
- Ethics
- Impartiality
- Inclusion
- Integrity
- Professionalism
- Transparency

## **Research and Development**

### **DIALOGUE**

Informing research through collaboration and inquiry.

### **DISCOVERY**

What we know thought we knew, and what we discovered.

### **DEVELOPMENT**

Investing in today, while preparing for tomorrow.

## **About Us**

*The Foundation is an impartial national non-profit and registered charity that promotes the advancement of Canada's burgeoning Animal-Assisted Services Sector.*

*We build bridges between communities, disciplines, and relevant sectors to benefit people, pets in service, and partners (animals in service).*

*We are dedicated to consumers, the welfare of animals in service, and the recognition of service providers while fostering public confidence.*

## *Table of Content*

Acknowledgments.....	1
Preamble - .....	1
Canine-Assisted Living.....	1
Consumers in an Evolving Marketplace .....	3
“Towards a new consumer rights paradigm” .....	3
ISO Committee on Consumer Policy (COPOLCO) .....	5
Guidelines Context – National Standards of Canada (NSC).....	6
Standards - Benefits for Consumers.....	6
A Canadian Service Dog Consumer Survey .....	7
Demographics .....	7
About Service Dogs .....	8
Getting a Service Dog – The Process .....	8
Terminologies.....	9
Consumers –Takeaways .....	9
A Voice from Health Practitioners and Clinicians.....	10
Health Practitioners and Clinicians –Takeaways.....	18
Balancing Regulation and Competition.....	19
Understanding the Theory of Co-Creation and Competition.....	20
A Marketplace Within the Marketplace.....	21
Informing Decisions –Takeaways .....	23
The Charter.....	24
Purpose of the Canadian Human Rights Act .....	24
Disability – A Complex Phenomenon .....	25
Canadian Human Rights Act and the Duty to Accommodate .....	25
A Glimpse at the Ontario Legislation .....	26
Defining Disability in Canada.....	26
Provincial and Territorial Income of People with Disabilities .....	28
Disability Rights and Responsibilities –Takeaways.....	28
Canada’s National Standardization Network (NSN).....	29
Benefits for Businesses .....	30
Benefits to Regulators.....	30

Canada’s National Standards Network –Takeaways .....	30
The Canadian Service Dog Marketplace.....	31
A European Backdrop.....	31
The Competition Act of Canada .....	32
Trade Association Dos and Don’ts – A Resource for Removing Industry Barriers .....	32
Types of Conformity Assessments – Measuring Success .....	33
The Emotional Lives of Animals .....	34
Ten Inventions That Changed Your World .....	35
The Canadian Service Dog Industry - An Evolving Landscape .....	36
Canadian Association of Guide and Assistance Dog Schools (CAGADS) Membership .....	37
Other Relevant Information, Resources, Publications, and Videos .....	39
Producers Survey.....	40
A Canadian Service Dog Industry SWOT Analysis - Takeaways.....	46
Closing Remarks .....	47
Unleashing Potential Phase II.....	47
Appendices A – Disability Definitions and Accommodation Continued .....	48
<b>Conflict-Free Statement</b> .....	50

## Acknowledgments

We would like to take this opportunity to thank Dr. Nancy Carter, Evaluation Scientist. Dr. Carter invested her time and expertise toward the survey designs while providing analytical guidance, of which we are truly grateful.

We would also like to extend our gratitude to C. Scott, a University of Ottawa student pursuing psychology studies, who played an integral role in compiling data from the producers' websites.

## Preamble - Canine-Assisted Living

As far back as the first century AD, ruins, paintings, and woodcarvings portrayed evidence of canines assisting people with daily living challenges. In the 1750s into the early 1800s, structured training and manuals began to materialize from Paris and Vienna. Dr. Gerhard Stalling was instrumental in initiating the guide dog movement in Germany in the early 1900s after World War I. In 1923, the German Shepherd Dog Association opened a training center in Potsdam (Assistance Dogs: Learning New Tricks for Centuries, by Jennie Cohen). For more than two centuries, this movement has been building momentum. Like other evolving industries, Canada's Service Dog Industry has its share of growing pains such as fragmentation, gaps, and systemic issues. Nonetheless, the industry shows much promise because there is no shortage of interest and passion, not to mention hundreds of years of collective experience and expertise within this evolving landscape. But the potential is not enough to revolutionize the industry – collaborative efforts must be deliberate and strategic to succeed.

To expand on this hypothesis, consider the Animal-Assisted Services (AAS) Sector as a whole; this up and coming sector possesses various moving parts, and one of its significant contributors is that of Canada's Service Dog Industry.

The AAS Sector encompasses numerous stakeholders such as representatives within the justice, public safety, corrections, healthcare, social services, voluntary sectors, and multiple disciplines.

Industry Canada utilizes Statistics Canada data to determine the economic indicators as well as to outline industry trends. Based on this information, Industry Canada recognizes 20 industries throughout Canada.

Industry Canada does not recognize the social value and economic impact of Canada's AAS sector and its Service Dog Industry counterpart even though both the sector and the industry provide non-commercial and commercial services. Furthermore, there is no sector explicit National Occupational Classifications.

Consequently, this study suggests that understanding the socio-economic impact and trends of Canada's Service Dog Industry is a fundamental gap that has yet to be filled. Capturing the industry's impact and trends would consider factors like employment, employment earnings, economic outputs, and value-added or cost-benefit calculations. Therefore, this publication is not exhaustive by any means. On the contrary, it promotes a case for further research and industry development.

As a result, this study underscores vital themes that could shape a Canadian framework to advance Canada's Service Dog Industry by safeguarding quality and public safety. Still, achieving service excellence is not a destination but a journey.

With these things in mind, let us now shift our focus to the heart of the matter, removing and preventing barriers associated with Canine-Assisted Living (CAL) and the credibility of dedicated service dog trainers and service dog training organizations (producers).

Cordially,

*Joanne Moss*

CEO, Project Coordinator & Researcher

## Consumers in an Evolving Marketplace

### *\*A Consumer Checklist for selecting Service Providers\**

'Consumers' are defined as individuals that use services and products. However, when referring to service dog handlers, or those searching for a service dog, terms like 'clients' or 'end-users' are generally used. This study will use these terms interchangeably.



### "Towards a new consumer rights paradigm"<sup>1</sup>

Consumer rights and human rights play a significant role in today's marketplace. Take Sinai Detch's research on South African human rights in South Africa; he explains that accepting consumer rights as a necessary attribute of human rights is echoed by the International Covenant on Economic, Social, and Cultural Rights (ICESCR). Detch elaborates, "in a consumer-oriented society, the protection of the individual consumer is perceived as part of maintaining human dignity-especially against big business organizations, monopolies, cartels, and multinational corporations."<sup>2</sup>

As such, he asserts that "an examination of several basic international and national documents reveals that it is due time to acknowledge consumer rights as human rights."<sup>3</sup>

The International Charter for Consumer Rights embodies consumer's rights and responsibilities as follows:

- 1) The right to safety.
- 2) The right to choose.
- 3) The right to be heard.
- 4) The right to be informed.
- 5) The right to consumer education.
- 6) The right to consumer redress.
- 7) The right to a healthy environment.
- 8) The right to basic needs.

#### *Council of Canadians with Disabilities*

*Involving Consumers – A Consumer Control—People with disabilities must be involved in all stages of the development of disability services and policies and in all decision-making that affects their lives.*

The Consumers Council of Canada embraced the Charter and added 'the right to privacy.'

The Council further stresses that it works within an environment that makes consumer representation challenging because many of the mishaps of government and business that negatively impact consumers unnecessarily harm the reputations of governments and businesses due to inadequate consumer representation<sup>4</sup>.

<sup>1</sup> Deutch, Sinai.

[https://www.researchgate.net/publication/308208833\\_Towards\\_a\\_new\\_consumer\\_rights\\_paradigm\\_Evaluating\\_consumer\\_rights\\_to\\_human\\_rights\\_in\\_South\\_Africa](https://www.researchgate.net/publication/308208833_Towards_a_new_consumer_rights_paradigm_Evaluating_consumer_rights_to_human_rights_in_South_Africa)

<sup>2</sup> Deutch, Sinai. "Are Consumer Rights Human Rights?" *Osgoode Hall Law Journal* 32.3 (1994): 537-578. [http://digitalcommons.osgoode.yorku.ca/ohlj/vol32/iss3/4\\_Are\\_Consumer\\_Rights\\_Human\\_Rights?](http://digitalcommons.osgoode.yorku.ca/ohlj/vol32/iss3/4_Are_Consumer_Rights_Human_Rights?)

<sup>3</sup> Deutch, Sinai. "Are Consumer Rights Human Rights?" *Osgoode Hall Law Journal* 32.3 (1994): 537-578. [http://digitalcommons.osgoode.yorku.ca/ohlj/vol32/iss3/4\\_Are\\_Consumer\\_Rights\\_Human\\_Rights?](http://digitalcommons.osgoode.yorku.ca/ohlj/vol32/iss3/4_Are_Consumer_Rights_Human_Rights?)

<sup>4</sup> <https://www.consumerscouncil.com/about>

“The International Consumer Protection Enforcement Network (ICPEN) is a membership organization consisting of consumer protection law enforcement authorities from across the globe. ICPEN provides a forum for developing and maintaining regular contact between consumer protection agencies and focusing on consumer protection concerns. By encouraging cooperation between agencies, ICPEN aims to enable its members to have a greater impact on their consumer laws and regulations.”<sup>5</sup>

The Competition Bureau of Canada is a member of the ICPEN and an independent law enforcement agency that ensures that Canadian businesses and consumers prosper in a competitive and innovative marketplace.<sup>6</sup>

Both the ICPEN and the Bureau emphasize the need to involve consumers in discussions that impact their lives. The Bureau further raises another critical point – *that regulation should be used only where market forces will not achieve legitimate government policy objectives.*

“We believe that regulation should be used only where market forces will not achieve policy objectives and, even then, only to the extent necessary to address those objectives.” [Competition Bureau of Canada – The Competition Advocate](#)

At present, service dog consumers are not represented at the ICPEN table. For this reason, taking a closer look at governmental instruments that structure legislation, regulations, and policies may provide useful insight into whether there is enough interest in representing service dog consumers at this table. If so, what are the benefits of doing so?

A question to keep in mind is, what are the current government public policy dynamics, objectives, and gaps concerning service dogs in Canada and Canada’s Service Dog Industry? Delving deeper could gain a comprehensive understanding of how the public and private sectors intersect and engage within the service dogs’ realm; further research could facilitate discussions to coordinate efforts.

During the progression of pertinent discussions, including the recent attempt to develop a National Standards of Canada for Service Dogs<sup>7</sup>, human rights have played an integral role.

Before Veterans Affairs Canada will make policy decisions, they have committed to reviewing the results of their Service Dog Pilot Study.<sup>8</sup>

Likewise, industry players have no way of knowing whether they are achieving or exceeding the desired outcomes and, ultimately, the impact needed to benefit veterans and their families’ lives without policy objectives. Therefore, this begs the question, how does the absence of public policy or uncoordinated public policy impact consumers, and in this instance, veterans, their families, and producers?

<sup>5</sup> <https://www.icpen.org/who-we-are>

<sup>6</sup> <https://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/home>

<sup>7</sup> <https://www.cf4aass.org/development-of-a-national-standard-of-canada-for-service-dogs.html>

<sup>8</sup> <https://www.veterans.gc.ca/eng/help/faq/service-dog-pilot-study>



With this brief backdrop in mind, the autonomous development of legislation, regulations, and policy objectives may be causing more harm than good because these processes limit input from numerous consumers, producers, regulatory bodies, and other stakeholders.

When legislation, regulations, and public policy are not aligned, systemic barriers emerge, making it more difficult for producers to meet the demands for service dogs, thus driving up the cost of producing service dogs. This cycle also increases wait times to acquire a service dog, which inadvertently contributes to individuals choosing to purchase ID Cards and vests online for their dogs.

A seamless approach could level the playing field through partnerships that aim to cultivate continuity, resources, support, and relevant information to benefit consumers, producers, and regulators alike.

## ISO Committee on Consumer Policy (COPOLCO)

The International Organization for Standardization (ISO) has a lot to say about *consumer policy and related standards*. Breakthroughs on this front consider a wide range of existing standards and committees.

However, current initiatives do not cover service dogs' that could be subject to change if Canadian consumers,' producers, regulators, and other stakeholders choose to shift this paradigm. A collective and united approach could provide valuable insight, guidelines, and principles to move this agenda forward.

One thing the Unleashing Potential – Phase 1 Study reaffirmed is that there is a need to develop Canadian Service Dog Industry Standards (CSDIS).

Moreover, there are numerous resources like UN Guidelines for Consumer Protection<sup>9</sup>, ISO/IEC Guide 71:2014, Guide for addressing accessibility in standards<sup>10</sup>, and ISO 26000 Guidance on social responsibility<sup>11</sup> that could influence voluntary standardization in this area along with the development of conformity assessment schemes.

**Former N.B. deputy chief coroner launches PTSD service dog mentoring program.**

*"I knew that a service dog was the thing that helped me. I had been a prisoner in my own home for a couple of years and when I found River, we were matched together, and I was able to go out and do things that I hadn't before," he said.*

*Source: Global News PTSD Mentor Program*

Subsequently, collaboration would help leverage consumer-oriented public policy and potentially shift systemic practices to streamline processes between the industry, the public sector, and private sectors.

Standards Council of Canada's "*Guidelines for Incorporating Standards by Reference in Regulations to Support Public Policy Objectives*"<sup>12</sup> is another useful governmental resource.

<sup>9</sup> <https://unctad.org/en/Pages/DITC/CompetitionLaw/UN-Guidelines-on-Consumer-Protection.aspx>

<sup>10</sup> <https://www.iso.org/standard/57385.html>

<sup>11</sup> <https://www.iso.org/iso-26000-social-responsibility.html>

<sup>12</sup> [https://www.scc.ca/en/system/files/publications/SCC\\_IBR-Guidelines-\\_v1\\_2018-09-05\\_EN.pdf](https://www.scc.ca/en/system/files/publications/SCC_IBR-Guidelines-_v1_2018-09-05_EN.pdf)

These guidelines take into account the following three options within the context of Canada's standardization network with the intention of "efficiently and cost-effectively advancing regulatory objectives."

## Guidelines Context – National Standards of Canada (NSC)

### Excerpts from the Guide – Connecting the Dots

- **Alternative References**

- Regulators may choose to reference more than one standard in a regulation to provide options by which compliance to certain performance requirements can be satisfied.

- **Partial References**

- Regulators often choose to incorporate a standard by reference as a whole in a regulation. This may be unsuitable, though in cases when only a portion, or portions, of the standard is relevant to the regulatory objective. In these instances, regulators may choose to incorporate only selected portion(s) of a standard in a regulation.

- **Qualified References**

- Regulators also have the option to exclude a portion, or several portions, of the referenced standard as being inappropriate for the regulatory purpose. This does not affect incorporating the remainder of the standard into the regulation, which would be legally binding.

### Standards - Benefits for Consumers<sup>13</sup>

Standards Council of Canada stresses how complying with standards, and third-party conformity assessment increases public confidence by helping to ensure,

- safer products and services,
- enhancing marketplace purchasing power or access based on consumer requirements, demand, and more options, and
- simplicity and compatibility due to consumer involvement and meeting the demand for and needs of consumers.

*"We've been happy to hear from The Canadian Foundation for Animal-Assisted Support Services. Its insights into some of the challenges faced by service dog teams has been most helpful as we continue to adapt transit services. We share your goals and look forward to working with you again."*

*The Canadian Urban Transit Association (CUTA) is committed to accessible transit for all Canadians." Quote: June 17, 2020*

<sup>13</sup> <http://www.scc.ca/en/standards/what-are-standards/benefits>

## A Canadian Service Dog Consumer Survey

CFAS announced the launch of the consumer survey on April 25, 2020. Participants were able to contribute until May 29, 2020. Participation in the survey was strictly voluntary.

The survey announcement was shared via social media and on the CFAS website. The purpose of this survey was to attain a consumer perspective. One hundred and fifty people responded.



Consumers were considered to be any one of the following:

- Caregivers/supports for individuals with service dogs
- Individuals and/or families interested in getting a service dog
- Owner-handlers
- Parents of children/youth with service dogs
- Individuals with service dogs

The survey captured the lived experiences of people with service dogs and those in the process of getting a service dog.

The introduction confirmed that responses would remain anonymous. The data collected would be analyzed and disseminated on a group basis and included in a final report on the Foundation's website.



### Demographics

The majority of respondents were adults between the ages of 18 and 64 (87%); 3% were seniors, and 15% reported they were less than 17 years of age, therefore, responding on behalf of a child or youth. The majority (66%) of respondents reside in Ontario, with a small number of respondents from other provinces. There were no respondents from Prince Edward Island, Nova Scotia, Newfoundland and Labrador, Yukon, Northwest Territories, or Nunavut. Of the 150 respondents, 47% are employed either full time (31%) or part-time (16%), and 28% disclosed that they were recipients of long term disability benefits, of which 22% were students and 15% were unemployed. The survey allowed participants to choose all applicable responses to their employment situation, and some respondents elaborated on their current situation. Several noted being out of work due to the Covid-19 Pandemic, being self-employed, or employed less than they would prefer. Other respondents shared that their medical condition makes working full-time a challenge.

## About Service Dogs

lab cross beagle mixed breed Goldendoodle X Shepherd  
 Labrador Retriever American cross Shepard Lab  
 Rottweiler mix Standard Poodle Golden Retriever  
 Collie German Shepherd retriever dog Labradoodle  
 Border Collie German Poodle Black Husky Australian Shepherd Golden

When asked how many service dogs the respondents have had, responses ranged from 0 – 3, with the majority (65%) reporting they’d only had one service dog. Of 143 respondents, 54% reported they had their service dog between 1 – 5 years. When asked how their service dogs benefit them, the majority (73%) said their dogs helped their mental health, followed by mobility support (32%) and alert support (30%). The answer choices are displayed below.

Eighty percent of respondents have obtained their service dog from Canada, while 4% came from the US and 3% from other countries. The majority of respondents (79 of 120) acquired their dog as a pet and either trained them on their own or paid for training. Participants were asked to rate how easy or difficult accessing reliable information, resources, and supports have been on their journey to get a service dog. Of those that had at least started the process (total of 126 respondents), the majority (87 participants; 69%) chose somewhat difficult (27%), difficult (18%), or very difficult (24%). Thirty-four participants (27%) chose somewhat easy (17%), easy (8%), or very easy (2%).

### Getting a Service Dog – The Process

Respondents were asked a series of questions about their experience in getting a service dog. When asked about their experience overall, 60% reported they were satisfied or very satisfied with their experience, compared to 9% that reported being dissatisfied or very dissatisfied.

Respondents with service dogs were asked to comment on the extent to which having a service dog aligns with their expectations. Of the 105 who responded to this question, 53% reported their expectations were exceeded, 41% said their expectations were met, and 6% reported their expectations were not met. When asked about how much the service dog has improved quality of life, the vast majority of 127 respondents said “extensive” (63%) or “a lot” (24%).

Some consumers felt the government should shut down websites and trainers who are not reputable or scamming people.

“For the purpose of this study the term ‘service dog’ is defined as canines that are assessed, socialized, and trained to carry out tasks that benefit persons with visible and invisible disabilities and other daily-living challenges.” CFAS

*\*This term does not include ‘guide dogs’ for people who are blind or visually impaired so as to respect the wishes of the guide dog community.*

Others mentioned a need for a central database and that not having standards is a problem. Another concern was that no one organization should determine whether a person needs a service dog.

Other Respondent(s) Comments expressed the need to learn about resources and what is entailed for owners to train their dogs. Some respondents felt that it should be more comfortable for owner trainers to receive social assistance to get the service dog benefit to prevent the escalation of court cases through the Ontario Social Benefits Tribunal. Others noted having a service dog made them feel safe.

## Terminologies

Some 'consumers' feel that the term 'service dog' needs to be redefined because there is no one mutually agreed-upon definition, which only adds to the confusion. For example, dogs trained to work with victims of crime tend to be referred to as service dogs in addition to other identifiers like a facility or court dogs<sup>14</sup>. Other consumer marketplace dilemmas are that acquiring a service dog may take up to two years, and then there is the cost factor. Different terminologies that need clear and concise definitions are words like professionals, accreditation, certification, and assessments.

## Consumers –Takeaways

1. Consumers are people that use paid, donated, or subsidized services and products.
2. Consumer rights are intrinsic to human rights.
3. Consumers need to be involved with matters that affect their lives.
4. The Competition Bureau of Canada is a member of the International Consumer Protection Enforcement Network.
5. Consumers benefit from standards.
6. The term service dogs and other relevant terminologies need to be clearly defined and consistent.
7. The vast majority of the participants affirmed that service dogs improve the quality of their lives and also make their handlers and/or families feel safer.
8. Some government disability programs include a service dog benefit, but not everyone on social assistance can access the benefits based on the current criteria.



<sup>14</sup> <https://courthousedogs.org/>

## A Voice from Health Practitioners and Clinicians

A survey seeking input from health practitioners and clinicians was launched on May 22, 2020. The survey was created to capture the perspectives of professionals who provide physical and mental health services to individuals who may benefit from acquiring a service dog or already have a service dog. Participation in the survey was voluntary. This survey was comprised of 22 respondents. Graphs and charts are primarily used to present the participants' responses.

The survey commenced by learning about the respondents' scope of practice. Fourteen responses were under the 'Other' category, as noted below, while direct responses indicated that two participants were nurses, and five were clinical psychologists.

- Behavioural Consultant
- Registered Psychotherapist
- Counsellor
- School Counsellor
- Clinical counsellor
- EAP Counsellor
- Licensed Counselling Therapist
- Registered Counselling Therapist
- Counselling Therapist
- Psychotherapist
- Counsellor
- Psychotherapist therapeutic counsellor
- Previous Nurse, Currently a Student

Eleven of the respondents have worked in their field of expertise between 1 to 5 years. Two worked between 6 - 10 years, one person between 11 to 15 years, and eight 16 or more years in their profession.



### The populations Served by Age Group - Scope of Services

Which of the following falls within the scope of your services? Please check all that apply.

Answer Choices	Responses		<b>Other Respondent(s) Comments:</b>  Individuals with disabilities and mental illnesses  Seniors  Caring Professionals; First Responders  Grief, loss, Compassion Fatigue, Burnout, and PTSD
Visible Disabilities	27.27%	6	
Invisible Disabilities	45.45%	10	
Life-Altering Injuries	36.36%	8	
Workplace Injuries	40.91%	9	
Chronic Illness	50.00%	11	
Addictions	45.45%	10	
Mental health	100.00%	22	
Other (please specify)		2	
	Answered	22	
	Skipped	0	

Answer Choices	Responses	
<b>Children</b>	63.64%	14
<b>Youth</b>	72.73%	16
<b>Adults</b>	90.91%	20
<b>Total Respondents</b>	22	

Answer Choices	Responses	
Yes - I've had clients/patients bring both service dogs and emotional support animals	27.27%	6
Yes - I've had clients/patients bring a service dog, but not an emotional support animal	0.00%	0
Yes - I've had clients/patients bring an emotional support animal, but not a service dog	18.18%	4
Yes - I've had clients/patients bring an animal, but I'm not sure if it was a service dog, emotional support animal, or a pet	4.55%	1
No - I've never had a client/ patient bring an animal to my office	50.00%	11
If you'd like to tell us anything further about your response to this question, please do so in the space below.		2
	Answered	22
	Skipped	0

One concern was that a client's sense of entitlement does not mean that they need an emotional/therapy support dog. Instead, they need to understand the legalities, ethics, and responsibilities first and foremost.

### In general, what is your level of comfort with clients/patients bringing animals to your workplace?

Answer Choices	Responses	
Extremely comfortable	59.09%	13
Very comfortable	18.18%	4
Somewhat comfortable	13.64%	3
Not so comfortable	0.00%	0
Not at all comfortable	0.00%	0
Not applicable	9.09%	2
If you would like to tell us anything further about your response to this question, please do so in the space below.		5
	Answered	22
	Skipped	0

#### Respondent(s) Comments

- Some practitioners stated that bringing dogs into the workplace often acts as an incentive to attend appointments.
- The range in the temperament of the animals, as well as handler training, is vast. Some teams have significant challenges that can impact a client's progress.
- Some are not comfortable being around an animal that isn't trained or when an animal is showing signs of distress.
- Animals are screened, and strict guidelines are in place in some practices for an animal before the animal is identified as an Emotional Support Animal (ESA).

When asked about their experience in assessing clients to receive a service dog, most of the respondents indicated they had not ever been asked to do so, and only 18% were asked to provide a referral. Similarly, 18% reported having a policy in place for providing referrals and assessments. Most respondents (82%) reported being at least somewhat familiar with research regarding patient outcomes as they relate to service dogs, and 95% reported being at least somewhat knowledgeable about the role of service dogs.

Answer Choices	Responses	
Yes	27.27%	6
No	72.73%	16
Not sure	0.00%	0
Not applicable	0.00%	0
If you would like to tell us anything further about your answer, please do so in the text box below.	9.09%	2
A couple of respondents said this is and isn't within their scope of practice.	Answered	22
	Skipped	0



When asked about their experiences in assessing clients to receive an emotional support animal, the majority (59%) of the respondents indicated that they had not been asked to do so; 23% reported being asked to provide a referral for a person to be assisted by an emotional support animal and 31% reported having a policy in place for providing referrals and assessments.

Most respondents (95%) reported being at least somewhat familiar with research regarding patient outcomes as they relate to emotional support animals, and all reported being at least somewhat knowledgeable about the role of emotional support animals.

Answer Choices	Responses	
Extremely familiar	13.64%	3
Very familiar	13.64%	3
Somewhat familiar	54.55%	12
Not so familiar	4.55%	1
Not at all familiar	13.64%	3
If you would like to tell us anything further about your response to this question, please do so in the space below.		1
	Answered	22
	Skipped	0

**Other Comment:**

More research is necessary. Access to research by clinicians, policymakers, and insurers is important.

**How knowledgeable would you say you are about the role of service dogs?**

Answer Choices	Responses	
Extremely knowledgeable	31.82%	7
Very knowledgeable	22.73%	5
Somewhat knowledgeable	40.91%	9
Not so knowledgeable	4.55%	1
Not at all knowledgeable	0.00%	0
If you would like to tell us anything further about your answer, please do so in the text box below.	0.00%	0
	Answered	22
	Skipped	0

**Have you ever been asked to provide a referral for a service dog?**

Answer Choices	Responses	
Yes	18.18%	4
No	81.82%	18
Not sure	0.00%	0
Not applicable	0.00%	0
If you would like to tell us anything further about your answer, please do so in the text box below.		1
	Answered	22
<b>Comment:</b> This is a frequent request.	Skipped	0

### Do you or your organization have a policy related to assessments and referrals for service dogs?

Answer Choices	Responses	
Yes	18.18%	4
No	63.64%	14
Not sure	18.18%	4
Not applicable	4.55%	1
If you would like to tell us anything further about your answer, please do so in the text box below.		3
	Answered	22
	Skipped	0

#### Respondent(s) Comments:

- I assess and assist clients with the expectations of their service dogs and find new ways to mitigate symptoms collaboratively.
- It is difficult to find reputable producers/trainers to refer to/or who follow up promptly/or have a reasonable waitlist
- No, but we could use one. For everyone's benefit. Staff, organization and patient.

### How familiar would you say you are with research on patient/client outcomes related to emotional support animals?

Answer Choices	Responses	
Extremely familiar	27.27%	6
Very familiar	27.27%	6
Somewhat familiar	40.91%	9
Not so familiar	0.00%	0
Not at all familiar	4.55%	1
If you would like to tell us anything further about your response to this question, please do so in the space below.		2
	Answered	22
	Skipped	0

#### Respondent(s) Comments:

- More is needed; I found very little supportive literature overall
- I work in the field of human-animal connection and have written a policy for my organization on ESA

When asked about their experience in assessing clients to receive an emotional support animal, the majority (59%) of respondents indicated they had not been asked to do so; 23% reported being asked to provide a referral for a person to be assisted by an emotional support animal and 31% reported having a policy in place for providing referrals and assessments.

Most respondents (95%) reported being at least somewhat familiar with research regarding patient outcomes as they relate to emotional support animals, and all reported being at least somewhat knowledgeable about the role of emotional support animals.

#### How knowledgeable would you say you are about the role of emotional support animals?

Answer Choices	Responses	
Extremely knowledgeable	27.27%	6
Very knowledgeable	36.36%	8
Somewhat knowledgeable	36.36%	8
Not so knowledgeable	0.00%	0
Not at all knowledgeable	0.00%	0
If you would like to tell us anything further about your answer, please do so in the text box below.		0
	Answered	22
	Skipped	0

#### Have you ever been asked to assess for a person to obtain an emotional support animal?

Answer Choices	Responses	
Yes	36.36%	8
No	59.09%	13
Not sure	4.55%	1
Not applicable	0.00%	0
If you would like to tell us anything further about your answer, please do so in the text box below.	4.55%	1
	Answered	22
	Skipped	0

#### Comment:

- This is complicated as some clients want to circumvent a 'no animal' policy by acquiring an ESA. As a rule, I will only support a client's request for an ESA if they are a regular client, have a diagnosed disability, and document how an ESA would alleviate symptoms.

#### Have you ever been asked to provide a referral for a person to be assisted by an emotional support animal?

Answer Choices	Responses	
Yes	22.73%	5
No	77.27%	17
Not sure	0.00%	0
Not applicable	0.00%	0
If you would like to tell us anything further about your answer, please do so in the text box below.		1
	Answered	22
	Skipped	0

### Do you or your organization have a policy related to assessments and referrals for emotional support animals?

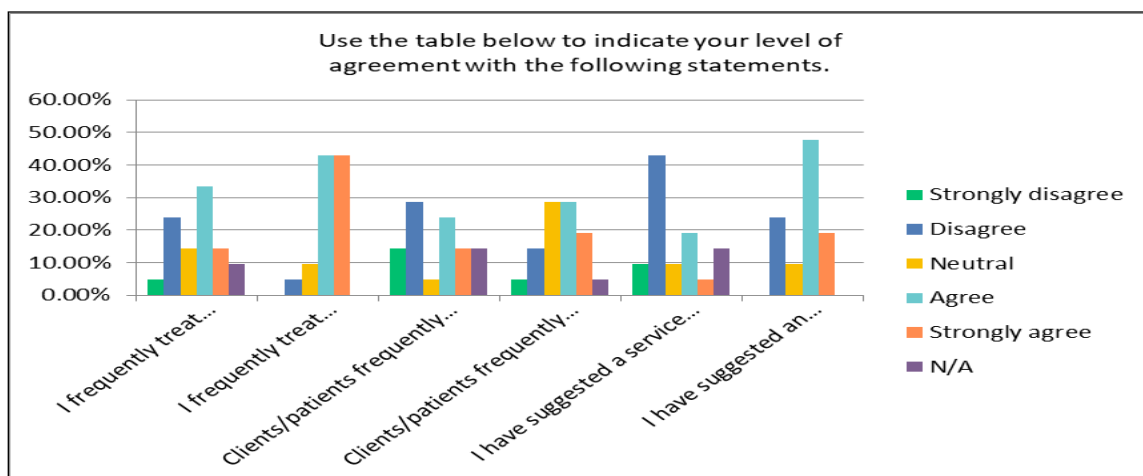
Answer Choices	Responses	
Yes	31.82%	7
No	40.91%	9
Not sure	22.73%	5
Not applicable	4.55%	1
If you would like to tell us anything further about your answer, please do so in the text box below.		2
	Answered	22
	Skipped	0

#### Respondents Comments:

- There are policies in place for Equine Assisted Therapy
- I work in an educational institution where students have requested ESA's on campus and in residence. A well-researched policy was necessary to ensure the protocol for clients, animals, and peer communities.

#### The following chart captures the responses to subsequent statements.

1. I frequently treat clients/patients who I think would benefit from a service dog
2. I frequently treat clients/patients who I think would benefit from an emotional support animal
3. Clients/patients frequently ask me questions about service dogs
4. Clients/patients frequently ask me questions about emotional support animals
5. I have suggested a service dog as a treatment for my clients/patients
6. I have suggested an emotional support animal as a treatment for my clients/patients



Respondents were also asked to indicate their level of agreement with the following six statements. The corresponding responses reflect their lived experiences concerning supporting and assisting clients concerning service dogs and emotional support animals.

**1. I feel comfortable providing advice to clients/patients about obtaining a service dog**

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	N/A	Total
14.29%	23.81%	23.81%	19.05%	9.52%	9.52%	21
3	5	5	4	2	2	

**2. I feel comfortable providing advice to clients/patients about obtaining an emotional support animal**

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	N/A	Total
9.52%	19.05%	9.52%	42.86%	19.05%	0	21

**3. I have access to all the guidelines and resources I need to meet my clients/patients' needs related to obtaining a service dog**

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	N/A	Total
28.57%	42.86%	4.76	19.05%	0	4.76%	21

**4. I have access to all the guidelines and resources I need to meet my clients/patients' needs related to obtaining an emotional support animal**

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	N/A	Total
19.05%	33.33%	19.05%	23.81%	4.76%	0	21

**5. I feel sufficiently knowledgeable about service dogs to meet the demand for information from my clients/patients'**

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	N/A	Total
9.52%	47.62%	9.52%	23.81%	4.76%	4.76%	21

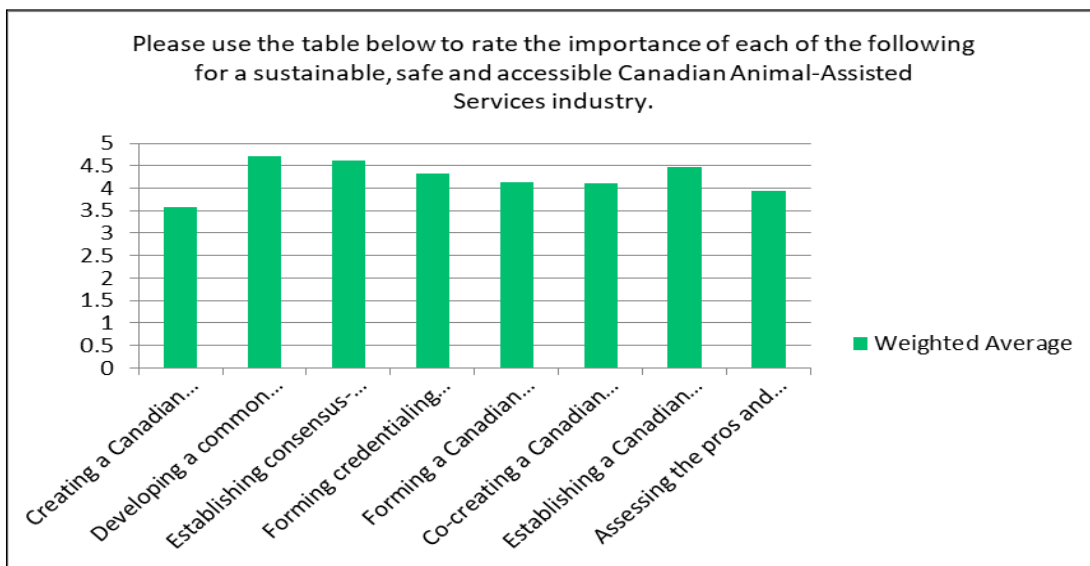
**6. I feel sufficiently knowledgeable about emotional support animals to meet the demand for information from my clients/patients'**

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	N/A	Total
9.52%	19.05%	9.52%	42.86%	19.05%	0	21

Finally, the participants were asked to rate the importance of each of the following statements. The options ranged from not important at all, somewhat important, important, very important, essential, or not sure.

The diagram reflects the overall weighted average of all responses, indicating that most felt that a national service dog fund's development was very important. At the same time, all remaining statements were considered essential.

1. Creating a Canadian service dog fund would help clients in financial need cover costs associated with their service dog (e.g., food, veterinary insurance).
2. Developing a common language around terminology related to this profession (e.g., service dog, assistance dog, accreditation, standards, certification, professionals, assessors).
3. Establishing consensus-based Canadian industry standards.
4. Forming credentialing criteria for assistance/service dog trainers, assessors, and related career paths.
5. Forming a Canadian speaker's bureau to educate the public.
6. Co-creating a Canadian advocacy strategy to remove accessibility and accommodation barriers of assistance/service dog teams.
7. Establishing a Canadian policy and procedures toolkit for health service providers.
8. Assessing the pros and cons of third-party accreditation of service dog organizations.



## Health Practitioners and Clinicians –Takeaways

### Respondents Closing Remarks

- Thank you for your work to protect the integrity of this industry as you seek the highest standards of care for the needs of vulnerable populations. With your assistance, Animal Assisted Therapy can meet its full potential.
- I would like to see similar standards developed for the therapy dogs that work with mental health professionals.
- As nurses, we as medical professionals need more reliable information to protect ourselves and patients when it comes to service dogs.
- Many organizations out there are making things worse for patients rather than better, and they are not held accountable. Also, concerning the Ontario Disability Support Program, the Ministry of Community and Social Services are stringent on who can get the “dog guide benefit” despite it not aligning with Ontario Definition. A national standard is needed as well as improved laws and procedures relating to service dogs.

Thank you for this survey. I believe the development of standards is essential, and that part of this standardization must encompass animal welfare. I feel this has been left out of most conversations as they tend to focus on benefits to humans only. Conversations regarding ESA's must extend beyond this if an animal would benefit the individual. Including whether the client can afford an animal, can provide adequate nutrition, exercise enrichment, and veterinary care. Without this, I would argue that the benefit has been compromised.

- More training for mental health practitioners is needed, as many are asked to 'prescribe' ESA's without adequate knowledge of what steps need to be followed. I trained for one year in AAT, so I am committed to competency and standardization.
- Canada desperately needs regulations on this.
- I think it would be wise to have a criterion for training standards of emotional support animals since they can cause damage and wreak havoc if they are untrained but certified. There should be a minimal training requirement. Also, there should be education for landlords. I worked with one woman who suffered severe depression after her dog was taken away when she was moved into a smaller apartment. Her doctor signed off, saying she needed the dog as an ESA, and she was willing to do all the training the landlord wanted. However, they still wouldn't allow the animal in the building even though it was small, non-shedding, hypoallergenic, non-barking, and had the doctor's note and my endorsement. She also had her family's support to care for the dog if, at some point, she couldn't. He just refused, and she was too depressed to fight, so the dog was rehomed even though it was her only comfort after losing her husband the year prior.

I have a dog that comes into my office with specific clients, and it is incredible the effect he has on being a co-regulator and in calming and soothing. He has helped many clients immensely in their therapeutic process and in meeting their mental health goals.

- I do not have experience with service dogs. My scope of practice uses horses to support clients in self-development and emotional growth, and healing. Thank you—best wishes on your research.

## Balancing Regulation and Competition<sup>15</sup>

The Competition Bureau of Canada published this comprehensive article which focuses on regulations that affect the economy and provides practical guidance to regulators to ensure that legitimate policy objectives are met while allowing the benefits of competition to be achieved.

The Bureau advocates that “in all sectors of the economy, regulation should only be put in place when there is good evidence to show that, without regulation, policy objectives will not be met.”

---

<sup>15</sup> <https://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/04141.html>

Likewise, the cost must not be measured merely in dollars and cents. Instead, legislation, regulations, and policy directives must consider their impact on service dog consumers, the service dog marketplace, and businesses grappling with accommodating service dog teams and the public.

## Understanding the Theory of Co-Creation and Competition

C. K. Prahalad and Venkat Ramaswamy, Harvard Business Review, January-February 2000, “Co-opting customer competence,” explains the theory of co-creation and why it is essential.

Prahalad and Ramaswamy put it this way. “Business competition used to be a lot like traditional theater: On stage, the actors had clearly defined roles, and the customers paid for their tickets, sat back, and watched passively.”

They go on to say that “In business, companies, distributors, and suppliers understood and adhered to their well-defined roles in a corporate relationship. Now the scene has changed, and business competition seems more like the experimental theater of the 1960s and 1970s; everyone and anyone can be part of the action.”

Moving beyond theory requires a leap of faith. Take the Canadian Food Inspection Agency (CFIA), for example. They asked the question, “What is co-creation?<sup>16</sup>”

CFIA concluded that “*co-creation is a form of open policy making where those implicated by the outcome are directly involved in its creation. This approach is one method of engaging in experimentation.*”

The CFIA used co-creation principles to safeguard Canada’s plant and animal resources by generating ideas, collaborative analysis, development, presenting, testing, and co-delivering the results.

The participants were considered partners willing to listen to and hear numerous perspectives from people with relevant expertise and experiences, hence why the CFIA achieved what they set out to do.

Theodore Roosevelt once said, “People don’t care how much you know until they know how much you care.” Therefore, it is possible that innovation is not limited to a deliverable(s), but rather authentic communication that enriches mutual trust and respect.

The current status-quo infers that anyone can be part of the fragmented Canadian Service Dog Industry with little or no accountability. In other words, anyone can hang a ‘shingle on their door’ to start their service dog business.

Adopting a collective phased in approach could have a number of targeted advantages. For example, Canadian Service Dog Industry Standards could become seed documents for the development of a suite of National Standards of Canada (NSC).

One of the many benefits of NSC are that published standards can be referenced in supplementary public policy, legislation, and regulations establishing continuity and enhanced credibility. CFAS

<sup>16</sup> <https://open.canada.ca/en/blog/co-creation-and-open-policy-making>



When there is money to be made with little or no accountability, safety, quality assurance, and credibility are compromised.

Co-creation complements Appreciative Inquiry (AI). AI helps to distinguish and analyze what is already functioning well. In other words, AI could be used to foster a groundbreaking discussion to co-create a shared vision for Canada's Service Dog Industry. The dialogue would focus on the industry's strengths before examining its weaknesses and threats.



[Fake service dogs a menace for legitimate owners, businesses alike.](#) Ashley Burke · CBC News  
· Posted: Mar 09, 2018 4:00 AM ET | Last Updated: March 9, 2018

*“Unlike properly trained service animals, these dogs sometimes bark, jump at people and cause other disruptions. It makes it more difficult for people who actually legitimately do need service animals.”*

*Kyle Rawn, Accessibility Professionals of Ontario*

Starting from a capacity vantage point may contribute to invested exploration to tackle old problems in new ways.

Canada's Service Dog Industry is at a crossroads. If nothing changes, nothing changes, and the status quo will continue to go unchallenged, but at what cost?

Is the 'familiar' worth holding onto at the expense of not initiating proactive change to ensure consumer satisfaction, the welfare of service dogs, public safety, and the credibility of dedicated producers'?

Likewise, unsuspecting donors, corporate sponsors, and grant-makers also risk being duped by savvy marketers.

The absence of an infrastructure to frame Canada's Service Dog Industry is a liability that negatively impacts all concerned. *The good news is the script can be re-written.*

***Simply put, co-creation is just good business!***

### **A Marketplace Within the Marketplace**

Inconsistencies and gaps have given way to the retail sector as well, whereby anyone can purchase a service dog ID card, a service dog vest, and harness followed by their disclaimers. Take the Service Dogs Canada.org disclaimer, for example.

#### **Service Dogs Canada's Disclaimer reads:**

“The information submitted to the servicedogsCanada.org website is provided by the purchaser for informational purposes only. The contents of this website are presented without any representation or warranty whatsoever, including as to the accuracy or completeness of the information contained herein.

The purchaser understands and agrees that the only involvement by servicedogscanada.org is to supply the represented information and equipment.” [Service Dogs Canada](#)

Then there is CertaPet. Their pitch is, “Get an Emotional Support Animal Letter You Can Trust for Less Than \$1/Day, Get Started with a Free Pre-Screening Now.”

They go on to say, “Why there’s No Such Thing to Register an Emotional Support Animal (ESA): Canada Style!

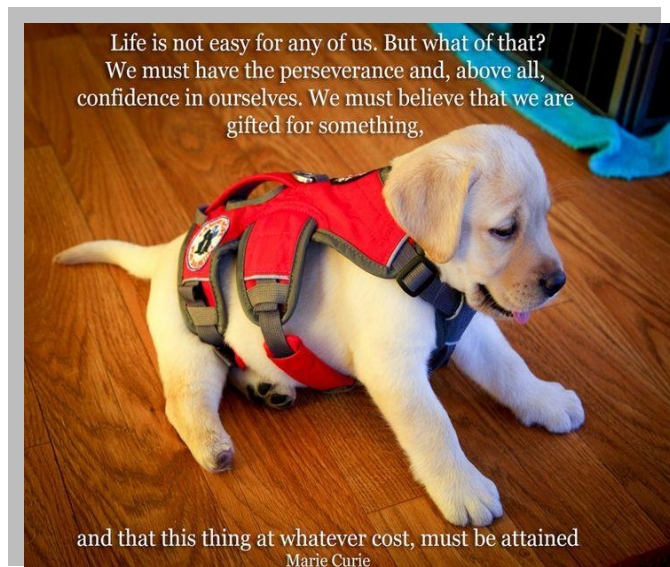
The so-called emotional support animal registration AND certification in Canada does not exist. No law requires you to register your ESA or to get them certified! Companies trying to sell you an emotional support animal certification in Canada are fraudulent. All you need to get an emotional support animal in Canada is an emotional support letter. This letter is issued by a qualified mental health professional. All the information it contains is about you as the owner and why you need one.”<sup>17</sup>

What about Therapeutic.org? “Don't be fooled by fake sites! The so-called emotional support animal registration AND certification in Canada does not exist.”<sup>18</sup>

But this trend does not stop here. Purchasing service dog paraphernalia has never been easier; Amazon, Wish, AliExpress, and Etsy, among others, are now part of this booming retail sector. To add to the mix, if certification is not necessary, then why are service dog registries surfacing? A basic [Google search](#) reveals much more.

### Root Causes

Prolonged wait times to access a service dog, not meeting a specific service dog organization’s application requirements or prohibitive costs, have contributed significantly to people deciding to train or work with a private trainer to train a dog of their choosing. Also, applications may be denied due to a person’s preference for a specific breed or wanting their pet to be trained as a service dog even though the dog may not be suitable. Regardless, it takes resources, knowledge, expertise, and experience to train working dogs.



<sup>17</sup> <https://www.certapet.com/emotional-support-animal-canada/>

<sup>18</sup> <https://therapeutic.org/canada-register-emotional-support-animal/>

Articles like “Guide dog owners call for a national standard to regulate service animal training, ownership” By Ross Lord Global News, Posted May 3, 2019, 9:48 AM Updated July 18, 2019, 8:41 AM<sup>19</sup> and “Fake service dogs a menace for legitimate owners, and businesses alike” by Ashley Burke · CBC News · Posted: Mar 09, 2018, 4:00 AM ET | Last Updated: March 9, 2018<sup>20</sup>

British Columbia’s Guide Dog and Service Dog Act, regulation, and policy updates<sup>21</sup> attempted to address public safety concerns. Still, these good intentions have not addressed systemic issues and industry fragmentation.

Tragic stories like the one broadcasted by CTVNews.ca Staff Jackie Dunham CTVNews.ca Writer, Published Thursday, January 10, 2019, 7:00 PM EST “Ont. Mother blames daughter’s suicide on U.S. man accused of not training service dogs<sup>22</sup>” are painful reminders of how badly things need to change. One death directly or indirectly linked to trying to acquire a service dog is one too many.

Other barriers to getting a service dog may involve the type of disability experienced by the consumer, a life-altering injury, or impairment. Some people may not have a support network to assist them, or they may be unable to leave their homes.

CFAS receives hundreds of emails annually concerning service dogs. Many people and family members feel intimidated and overwhelmed when trying to navigate this fragmented environment. Consumers need and deserve trustworthy information and sources to reduce the risk of being exploited and misled.

Furthermore, consumers need reliable options within this multi-million-dollar unregulated industry and marketplace to get the necessary support and resources to make informed decisions. Indeed, this is the impetus required to form a ‘coalition of the willing’ to ensure that appropriate needs are met appropriately and promptly.

### **Informing Decisions –Takeaways**

---

- A conflict-free method to identify trustworthy sources is essential to reduce the risk of consumers being exploited and misled and to ensure the welfare of service dogs and public safety.
- Co-creation is just good business.
- Consumers need more opportunities to engage with the industry and other stakeholders to ensure their views are heard in areas that impact their lives while also learning about others' opinions.
- Handlers and their families need support, resources, and credible information to make educated decisions.

<sup>19</sup> <https://globalnews.ca/news/5232932/guide-dog-owners-national-standard-service-animal-training-ownership/>

<sup>20</sup> <https://www.cbc.ca/news/canada/ottawa/ontario-hotels-fake-service-animal-scam-1.4567432>

<sup>21</sup> <https://www.bcclaws.ca/civix/document/id/complete/statreg/15017>

<sup>22</sup> <https://www.ctvnews.ca/canada/ont-mother-blames-daughter-s-suicide-on-u-s-man-accused-of-not-training-service-dogs-1.4248417>

- Participants, including the public and private sectors, are more than stakeholders; they are potential partners.
- There is a need for a suite of Canadian Service Dog Industry standards, consistent terminologies, and a process that involves multi-stakeholder collaboration and cooperation to initiate collective conflict-free decision making.

## The Charter

The [Canadian Charter of Rights and Freedoms](#)<sup>23</sup> guarantees the right to equal protection and equal benefit of the law without discrimination and, in particular, discrimination based on disability. [The Canadian Human Rights Act](#)<sup>24</sup> echoes this right, as does [Bill C-81](#) An Act to ensure a barrier-free Canada (Short Title: Accessible Canada Act). This Act received [Royal Assent](#) on June 21, 2019.

The Universal Declaration of Human Rights ([UDHR](#)) states, “*Whereas recognition of the inherent dignity and the equal and inalienable rights of all members of the human family is the foundation of freedom, justice, and peace in the world.*”

Canadian John Peters Humphrey, Director of the Division of Human Rights within the United Nations Secretariat, was called upon by the United Nations Secretary-General to work on the project and became the Declaration's principal drafter.<sup>25</sup>

The Disability Rights Movement in Canada Article by Dustin Galer Published online February 5, 2015, Last Edited April 23, 2015, points out that the Canadian disability rights movement arose in the latter half of the 20th century.

It includes multiple social movements that take a similar but distinct approach advocating civil rights for almost four million people with physical, sensory, and cognitive impairments — nearly 14 percent of the Canadian population.<sup>26</sup>

### Purpose of the Canadian Human Rights Act

The purpose of this Act is to “extend the laws in Canada to give effect, within the purview of matters coming within the legislative authority of Parliament, to the principle that all individuals should have an opportunity equal with other individuals to make for themselves the lives that they are able and wish to have and to have their needs accommodated, consistent with their duties and obligations as members of society, without being hindered in or prevented from doing so by discriminatory practices based on race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability or conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered.”<sup>27</sup>

<sup>23</sup> <https://www.parl.ca/DocumentViewer/en/42-1/bill/C-81/royal-assent>

<sup>24</sup> <https://www.canlii.org/en/ca/laws/stat/rsc-1985-c-h-6/latest/rsc-1985-c-h-6.html>

<sup>25</sup> <https://www.parl.ca/legisInfo/BillDetails.aspx?billId=9990870&Language=E>

<sup>26</sup> Dustin Galer. <https://www.thecanadianencyclopedia.ca/en/article/disability-rights-movement>

<sup>27</sup> <https://laws-lois.justice.gc.ca/PDF/H-6.pdf>

## Disability – A Complex Phenomenon

According to Employment Social Development Canada (ESDC), “Disability is a complex phenomenon, reflecting an interaction between features of a person's body and mind and features of the society in which they live. A disability can occur at any time in a person's life; some people are born with a disability, while others develop a disability later in life. It can be permanent, temporary, or episodic. Disability can steadily worsen, remain the same, or improve. It can be very mild to very severe. It can be the cause and the result of disease, illness, injury, or substance abuse. Because of its complexity, there is no single, harmonized “operational” definition of disability across federal programs.”<sup>28</sup>



Subsequently, physicians’ may find themselves in a bit of a quandary when trying to make this determination depending upon the definition's purpose. For instance, the legal test for CPP disability is one of employability rather than medical eligibility.

Eligibility determinations for *Canada's Disability Tax Credit* are not without its challenges, and denial may impede a patient from getting an assessment for a service dog or other supports and benefits needed to make life manageable and accessible.

### Canadian Human Rights Act and the Duty to Accommodate

Section (g) unpacks accommodation as follows.

“To be considered to have a bona fide justification, it must be established that accommodation of the needs of an individual or a class of individuals affected would impose an undue hardship on the person who would have to accommodate those needs, considering health, safety, and cost.”

While the Ontario Human Rights Code is silent concerning what defines a service animal, the Human Rights Tribunal of Ontario (the “Tribunal”) has provided some guidance on the matter.

For example, in *Allarie v Rouble*, the Tribunal made it clear that “there is nothing in the Code which limits the definition of a service animal to one which is trained or certified by a recognized disability-related organization.”

Despite this precedent, people partnering with service dogs in Ontario are still frequently challenged when applying for government benefits for their service dogs.

<sup>28</sup> <https://www.canada.ca/en/employment-social-development/programs/disability/arc/reference-guide.html>

## A Glimpse at the Ontario Legislation

### Ontario

“Several pieces of legislation in Ontario specifically address rights and restrictions for persons who use service animals. These include Ontario’s Human Rights Code (the “Code”), the Accessibility Standards for Customer Service Regulations under the Accessibility for Ontarians with Disabilities Act (the “AODA”), the Blind Persons’ Rights Act (the “BPRA”), and the Health Promotion and Protection Act (“HPPA”)”<sup>29</sup>

### Arch Disability Law Continued

#### Ontario Human Rights Code

“The definition of “disability” pursuant to the Code includes any person who has a “physical reliance on a guide dog or other animal” and extends the protection of the Code to persons who require the use of service animals.”

“The Tribunal has emphasized that service cannot be denied to persons with disabilities who use service animals. Organizations have a legal obligation under the Code not to refuse a person's entry or access to a building, premise, good, or service on the basis that the person uses a service animal. *If a person is accompanied by a service animal for disability-related reasons, denying entry or access to the person and his or her service animal would consequently be discrimination on the ground of disability.* It is important to note, however, that the Tribunal has also demonstrated that they are sensitive to the fact that many service providers and organizations are not well-versed in their obligations and duties when it comes to the use of service animals by persons with non-evident disabilities.”<sup>30</sup>

## Defining Disability in Canada

The Government of Canada does not have a single official definition of disability. However, it is advisable to consult the definitions of disability used by the World Health Organization (WHO) and by the United Nations (UN) in its Convention on the Rights of Persons with Disabilities.

*According to the WHO, disabilities are not defined in terms of specific categories of individuals, but rather as the interactions between people and the societies in which they live.*

The UN Convention on the Rights of Persons with Disabilities describes persons with disabilities as those who have long-term physical, mental, intellectual, or sensory impairments, which in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others. For more information, please consult the following link: <http://www.un.org/disabilities/convention/conventionfull.shtml>.

<sup>29</sup> <https://archdisabilitylaw.ca/focus-the-law-of-service-animals-in-ontario/>

<sup>30</sup> <https://archdisabilitylaw.ca/focus-the-law-of-service-animals-in-ontario/>

People with disabilities often face the stigma of being labeled dependent. Labels are offensive, as they ignore the abilities of people with disabilities and their real and potential contribution to society.

It is essential to use terms that promote equality, independence, and value to promote inclusive environments. For more information on the correct usage of terms about people with disabilities, please review the following document:

*“It is advisable to consult the definitions of disability used by the World Health Organization (WHO) and by the United Nations (UN) in its Convention on the Rights of Persons with Disabilities.”<sup>31</sup>*

***The World Health Organization's (WHO) definition of barriers:***

“Factors in a person’s environment that, through their absence or presence, limit functioning, and create disability. These include aspects such as:

- a physical environment that is not accessible,
- lack of relevant assistive technology (assistive, adaptive, and rehabilitative devices),
- negative attitudes of people towards disability, and
- services, systems, and policies that are either nonexistent or that hinder the involvement of all people with a health condition in all areas of life.”

The Overview of Human Rights Codes by Province and Territory in Canada<sup>32</sup> published in January 2018 provides further insight into this subject matter.

According to Statistics Canada, “An estimated one in five Canadians (or 6.2 million) aged 15 years and over had one or more disabilities that limited them in their daily activities, according to new findings from the 2017 Canadian Survey on Disability (CSD).

For many of these Canadians, challenges and obstacles in their day-to-day lives may limit their full participation in society. Understanding the challenges faced by persons with disabilities in their personal, employment, or economic situations helps inform government policy.”

Furthermore, “The prevalence of disabilities among Canadians tends to increase with age. However, more than 540,000 youths aged 15 to 24 years (13%) had one or more disabilities; this is compared with 20% or 3.7 million working-age adults (25 to 64 years), and 38% or 2 million seniors aged 65 and over. Women (24%) were more likely to have a disability than men (20%) were, and this was the case across all age groups.”

Other considerations, “Severity is a major factor in looking at the lives of persons with disabilities. Those with more severe disabilities often have lower rates of employment, lower-income even when employed full-year and full-time, and a greater likelihood of living in poverty regardless of age. In 2017, 57% of Canadians with disabilities had a “milder” disability (classified as having a mild or moderate disability), and 43% had a “more severe”

<sup>31</sup> <https://www.canada.ca/en/employment-social-development/programs/disability/arc/reference-guide.html>

<sup>32</sup> <https://ccdi.ca/media/1414/20171102-publications-overview-of-hr-codes-by-province-final-en.pdf>

disability (classified as having a severe or very severe disability). In all cases, the disability was severe enough to limit them to some extent in their daily activities.”

### Provincial and Territorial Income of People with Disabilities

Service delivery within this marketplace is multifaceted; therefore, consumers' income levels are an important factor to consider in purchasing services, soliciting donations, grants, sponsorship, and caring for service dogs during their lifetime of service. Some handlers prefer to keep their retired service dogs and therefore absorb the cost of doing so.

The Conference Board of Canada provincial and territorial income ranking in 2012 reads as follows, Manitoba is the best-performing province: the average income of people with disabilities is 76.5 percent that of people without disabilities. Alberta is the worst-performing province, as people with disabilities earn, on average, just two-thirds that of people without disabilities. People living with disabilities earn between 70 and 75 percent of the income earned by people without disabilities in most provinces. Source: [Conference Board of Canada](#)<sup>33</sup>

### Disability Rights and Responsibilities –Takeaways

- The United Nations' *Convention on the Rights of Persons with Disabilities (CRPD)* recognizes that “*disability is an evolving concept and that disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinder their full and effective participation in society on an equal basis with others.*”<sup>34</sup>
- Framing policy, procedures, programs, and this emerging industry from this vantage point may *promote the harmonization of collective approaches* while facilitating barrier-free Canine-Assisted Living.
- Access to government service dog benefits needs to be based on the person rather than the service dog's sourcing. Public safety and quality assurances are industry and marketplace matters.
- With an aging population, the demands for service dogs continue to rise.
- It would be prudent for Canada's Service Dog Industry to work within these existing parameters to initiate the development of a suite of collective standards as well as homogeneous terminologies.

<sup>33</sup> <https://www.conferenceboard.ca/hcp/provincial/society/disability-income.aspx?AspxAutoDetectCookieSupport=1>

<sup>34</sup> From the Preamble (e) to the CRPD, supra note 6 at p. 3.



## Canada's National Standardization Network (NSN)

### What is Canada's national standardization network?

"Canada's national standardization network is the network of people and organizations involved in voluntary standards development, promotion, and implementation in Canada."<sup>35</sup>

### About the Standards Council of Canada (SCC)<sup>36</sup>

"SCC is a federal Crown Corporation responsible for promoting standardization in Canada. SCC leads and facilitates the development and use of national and international standards and accreditation services to enhance Canada's *competitiveness and well-being*. SCC's mission involves working with our stakeholders and customers (its accredited Standards Development Organizations – SDO) to promote efficient and effective standardization that strengthens Canada's competitiveness and social well-being. Everything SCC does is aimed at improving Canadians' quality of life."

### What are standards?

According to SCC, "a standard is a document that provides a set of agreed-upon rules, guidelines, or characteristics for activities or their results. Standards establish accepted practices, technical requirements, and terminologies for diverse fields. They can be mandatory or voluntary and are distinct from Acts, regulations, and codes. *National Standards of Canada (NSC) can be referenced in any of these legal instruments.*"

"Most standards aim to attain an optimal level of order within a certain context. Standards developed within internationally recognized protocols like the International Organization for Standardization (ISO) are easy to recognize and reference giving way to Canadian and global marketplaces around the world."

### Standards can be either voluntary or mandatory

"Standards are voluntary when organizations are not legally required to follow them. Organizations may choose to follow them to meet customer or industry demands. Standards are mandatory when they are enforced by laws or regulations, often for health or safety reasons."

### ***A standard is distinct from an Act, a regulation, or a code:***

"An Act is a statute that establishes control or directives based on legal authority.

A regulation is a statutory instrument made by exercising a legislative power conferred by an Act of Parliament. Regulations have binding legal effects. If a voluntary standard is referenced in a regulation, it becomes mandatory.

<sup>35</sup> <https://www.scc.ca/en/help/faqs/what-canadas-national-standardization-network>

<sup>36</sup> <http://www.scc.ca/>

A code is broad in scope and is intended to carry the force of law when adopted by a provincial, territorial, or municipal authority. Code may include any number of referenced standards.”

The standards SCC refers to are performance-oriented, prescriptive that test products, design standards that test the technical nature of a product, and management system standards that define and map out a business’s policies and objectives. Other factors to consider when developing standards are whether they are intended to be voluntary or mandatory.

### **Benefits for Businesses**

“Simply put, standards make everyday life work, and for Canadian businesses, standards open up a world of possibilities. Standards are the unseen infrastructure designed to safeguard the safety of all Canadians while lending credibility to those that demonstrate conformity to the standards, safety, and reliability that exemplify quality assurance and service excellence.

Collaborative standards, fuel Canada’s economy, foster innovation, cultivate competitive advantage, reduce trade barriers, improve performance and production, and help to manage risk.”

### **Benefits to Regulators**

“Canadian standards that are developed by balanced representation through a collaborative process, while open to the public, published in both official languages that take into account other relevant standards within and outside Canada are beneficial to government officials. SCC adds a layer of quality assurance through its accreditation program to help prevent conflict of interest to ensure that published *National Standards of Canada (NSC)* benefit the Canadians they will affect, like consumers, businesses, and the general public.”

### **Canada’s National Standards Network –Takeaways**

- Revisiting standards to ensure their value in this ever-changing world is considered a best practice. Doing so saves time, resources, and money.
- Working with third-party conformity assessment organizations provides the confidence needed to demonstrate compliance with relevant standards without governments regulating an industry's responsibilities.
- Conducting governmental Regulatory Impact Analysis (RIA) may help redirect resources to meet the demand for sound service dogs.
- Public sector stakeholders can contribute to the success of Canada’s Service Dog Industry by promoting competition in the marketplace to achieve their respective objectives. In such cases, an RIA may be useful to determine whether a policy outlining values, ethics, goals, objectives, and corresponding procedures may be more fitting than legislation and regulations.

- Management System Standards tend to be the European approach. The latter is best suited for ensuring that the service provider/producer (trainers, assessors, animal behaviourists, and training schools) are operating effectively.

## The Canadian Service Dog Marketplace

The current service-dog industry environment is a mixture of business models like sole proprietorships, for-profits, non-profits, membership-based franchises, and registered charities. Some producers are members or affiliates of particular organizations, while others prefer to work independently.

The term '**accreditation**' within this milieu does not refer to a 'third party' contractual or governmental accreditation through regulatory requirements. But instead, an internal process suggesting a degree of self-attestation and peer reviews that determine an organization's benchmarks or private company standards for brand performance and recognition.<sup>37</sup>

The absence of voluntary third-party certification and program accreditation increases the risk of misleading advertising, inconsistent, and questionable practices. Moreover, a lack of transparency and accountability may lead to the exploitation of unsuspecting consumers, donors, grant-makers, sponsors, volunteers, and the public.

## A European Backdrop

Due to the rapid growth of the evolving service dog field and its unregulated fragmentation, the topic of standards is at an all-time high. Interestingly, the *Bulgarian Institute for Standardization* proclaimed that they are always a step ahead when they proposed the '**Assistance Dog and Guide Dog Teams Standards**'<sup>39</sup> and 'Instructors Competences Initiative.'

The initiative for this new field of technical work was launched by the *Slovenian Instructors Association – Centre for Guide Dogs and Assistance Dogs (SLO-CANIS)* and is based on the standardization work done so far in the field:

the CEN/CWA 16520:2012 "Guide dog mobility instructor – Competences" and recently published document CEN/CWA 16979:2016 'Dog training professionals – Knowledge, skills and competence requirements.' The main proponent of this initiative was the European Guide Dog Federation (EGDF). [Click here](#) to read more.

### **Assistance Dog and Guide Dog Teams Standards and Instructors Competencies Initiative**<sup>38</sup>

This initiative was followed by The CEN Workshop Agreement on 'Dog training professionals - Knowledge, skills, and competence requirements' (CWA 16979:2016) published in January 2016. This pro-to-standard covers many types of trainers of dogs, in the behavioural, assistance, and sports areas that include trainers of Guide Dogs and Service Dogs, but not Police Dogs or dogs used by the military. The following links provide further details.

<sup>37</sup> [https://www.cf4aass.org/uploads/1/8/3/2/18329873/service\\_dogs\\_in\\_canada\\_-\\_an\\_evolutionary\\_landscape\\_-\\_jan\\_9\\_2019.pdf](https://www.cf4aass.org/uploads/1/8/3/2/18329873/service_dogs_in_canada_-_an_evolutionary_landscape_-_jan_9_2019.pdf)

<sup>38</sup> [http://www.bds-bg.org/en/pages/page\\_880.html](http://www.bds-bg.org/en/pages/page_880.html)

CFAS's involvement in the industry precipitated a discussion with the Standards Council of Canada (SCC) to explore the possibility of applying to the European Committee for Standardization (CEN) to establish an impartial observing status on CEN technical committees. SCC was instrumental in providing more information for the Foundation's consideration.

### **Competition Around the World<sup>39</sup>**

The Competition Bureau of Canada is a member of the *International Competition Network*. The subject of competition has been a common theme throughout this study due to its applicability. Why is this important? Because the Bureau's mandate, like its counterparts, helps to ensure that businesses and consumers prosper in a competitive and innovative marketplace.

Consequently, the harmonization of minimum standards within the service dog industry must be weighed in conjunction with the short and long-term big picture to avoid pitfalls. The ensuing list provides some tangible examples.

### **The Competition Act of Canada**

#### **Trade Association Dos and Don'ts – A Resource for Removing Industry Barriers**

The Competition Bureau of Canada's list of "Dos and Don'ts" for Trade Associations is intended to help minimize risk under the Act. While the title targets 'Trade Associations,' the principles are no less applicable to individual producers and businesses.

#### **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;

<sup>39</sup> <http://www.consiliulconcurentei.ro/en/useful-links/competition-authorities-around-the-world/>

- 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.

#### **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.

## Types of Conformity Assessments – Measuring Success

“ISO (the International Organization for Standardization) and IEC (the International Electrotechnical Commission) form the specialized system for worldwide standardization.”<sup>40</sup> Therefore, providing more contextual meaning through these channels helps to unpack terms like second and third-party certification.

---

<sup>40</sup> <https://www.iso.org/obp/ui/#iso:std:iso-iec:17000:ed-2:v1:en>

“ISO/IEC 17000 Conformity Assessment – Vocabulary and general principles define the first party as a “conformity assessment activity that is performed by the person or organization that provides the object” (clause 2.2).

That means in the case of ISO/IEC 17024, if a certification body were to self-assess that they meet ISO/IEC 17204, that would be considered a first-party assessment; this cannot be called accreditation because, like “certification,” accreditation must be performed by a third party. Since the certification body is assessing itself, this is not a third party and, therefore, cannot be accreditation.<sup>41</sup>

## ISO Excerpts

### First-party conformity assessment activity

conformity assessment activity that is performed by the person or organization that provides or that is the object of conformity assessment (4.2).

### Second-party conformity assessment activity

conformity assessment activity that is performed by a person or organization that has a user interest in the object of conformity assessment (4.2).

### Third-party conformity assessment activity

conformity assessment activity that is performed by a person or organization that is independent of the provider of the object of conformity assessment (4.2) and has no user interest in the object.

### Peer Assessment

Assessment of a body against specified requirements (5.1) by representatives of other bodies in, or candidates for, an agreement group (9.10).

### Accreditation

Third-party attestation (7.3) related to a conformity assessment body (4.6), conveying formal demonstration of its competence, impartiality (5.3), and consistent operation in performing specific conformity assessment activities. More details are available on the ISO’s website.<sup>42</sup>

These prospects would not exclude current industry practices but enhance them through a voluntary global standardization and conformity assessment framework.

## The Emotional Lives of Animals

The purpose of developing a National Standard of Canada was to “ensure consumer confidence in the services.” However, it was equally evident that service dogs’ welfare and humane training methodologies were a collective priority.<sup>43</sup>

<sup>41</sup> [www.proftesting.com/blog/2016/09/28/first-second-and-third-party/](http://www.proftesting.com/blog/2016/09/28/first-second-and-third-party/)

<sup>42</sup> <https://www.iso.org/obp/ui/#iso:std:iso-iec:17000:ed-2:v1:en>

<sup>43</sup> Update: April 16, 2018 – Notice of Intent Withdrawn  
<https://www.scc.ca/en/standards/notices-of-intent/cgsb/service-dogs>

Animals' emotional lives are just as meaningful as human emotions, as is their ongoing care. "Combining careful scientific methodology with intuition and common sense," says Jane Goodall, Ph.D., DBE, founder of the Jane Goodall Institute, are essential qualities for those who are committed to improving the lives of animals."



Jane Goodall is one of many scientists who have revealed how much there is to learn from animals about social organisation and communication. AAP/Julian Smith



### ***The Canadian Veterinary Medical Association (CVMA) October 16, 2015***

#### [Humane Training Methods for Dogs – Position Statement<sup>44</sup>](#)

The Canadian Veterinary Medical Association (CVMA) supports humane training methods for dogs based on current scientific knowledge of learning theory.

Reward-based methods are highly recommended. Aversive methods are strongly discouraged as they may cause fear, distress, anxiety, pain, or physical injury to the dog.

### **Ten Inventions That Changed Your World**

Although these inventions may have appeared incomprehensible back in the day, what happens when people dare to dream, persevere, and take a leap of faith?

### **Managing Risk to Improve Quality of Life**

There are risks involved if nothing changes, and there are risks involved if something does.

Michelle Mulder wrote an inspiring article posted on October 29, 2018,<sup>45</sup> called "11 Inventions to Celebrate." This article cited the following Canadian inventions.

- Insulin
- Canadarm (space research)
- Birchbark Canoe
- Marquis Wheat Kernels - Is your bread well-bred? You bet!
- Paint Roller
- Robertson Screwdriver
- Pacemaker
- Electric Oven
- Blackberry
- Snowmobile
- Foghorn



<sup>44</sup> <https://www.canadianveterinarians.net/documents/humane-training-methods-for-dogs>

<sup>45</sup> <https://www.canadashistory.ca/explore/science-technology/11-inventions-to-celebrate>

These inventors risked being misunderstood, mocked, dismissed and the possibility of failing, but thank goodness, they did not give up.

Without risk-takers like Dr. Gerhard Stalling, who initiated the guide dog movement in Germany in the early 1900s after World War 1 and a Canadian engineer George Klein<sup>46</sup> who made the world more accessible by inventing the motorized wheelchair in 1952 life as we now know it could have taken a very different turn for people who use a wheelchair.

### *Social Inventions*<sup>47</sup>



What exactly is a social invention, and what does it have to do with service dogs?

According to Stuart Conger, former Chairman and Executive Director, Saskatchewan NewStart Inc., “A social invention is a new law, organization or procedure that changes the ways in which people relate to themselves or to each other, either individually or collectively.”

Might this definition or similar definitions inspire and even warrant a closer look at Canada’s Service Dog Industry. If so could it initiate a paradigm shift when it comes to being able to access well

trained and socialized service dogs.

Thousands of Canadians partner with service dogs because they need a service dog just as much as some folks need their wheelchairs. Sometimes they may even need both.

Others may wait up to three years to be matched with a service dog.

Even though service dogs are flesh and blood their value is no less significant or worthy of our attention than that of other inventions like hearing aids or other assistive devices.

## The Canadian Service Dog Industry - An Evolving Landscape

The enclosed tables provide a snapshot of Canadian producers. Please note that the checkmarks concerning practices and requirements simply indicate that some information is available on the applicable websites, but the content and extent varies.

### [Canadian Association of Guide and Assistance Dog Schools \(CAGADS\)](#)

[CAGADS Canine Humane Care Training and Treatment Policy](#)

[CAGADS School Protocol 2012](#)

<sup>46</sup> [George Klein Inventor](#)

<sup>47</sup> The Innovation Journal: The Public Sector Innovation Journal, Volume 14(2), 2009



## [Assistance Dogs International- Glossary of Terms](#)

### **[Canadian Association of Guide and Assistance Dog Schools \(CAGADS\) Membership](#)**

[Autism Dog Services Inc.](#)

[British Columbia and Alberta Guide Dog Services](#)

[Canadian Guide Dogs for the Blind](#)

[COPE Service Dogs](#)

[Dogs with Wings Assistance Dog Society](#)

[Lions Foundation of Canada Dog Guides](#)

[MIRA Foundation Inc.](#)

[National Service Dogs Training Centre, Inc.](#)

[Pacific Assistance Dogs Society](#)

---

### **[Canadian Association of Service Dog Trainers \(CASDT\) Membership](#)**

**Membership** - [Minimum Membership Standards Overview](#)

[Chip Kean, MMM, CD Associate Certified Dog Behavior Consultant](#)

[Citadel Canine Society](#)

[Cloverfield Behaviour \(Heather Logan\)](#)

[Courageous Companions – MSAR Standards](#)

[Kim Robertson KPA CPT Dog Sense](#)

[MSAR Service Dogs - MSAR Standards](#)

[No Dogs Left Behind](#)

[Pet Intel. Behaviour Centre](#)

[Rachel Savage Service Dog Assistance Partners](#)

[Suzanne Wiebe CEG, ACDBC Blackridge Service Dogs](#)

[VI K9 Consulting & Training](#)

[Watch My 6](#)

---

	Practices Overview	Requirements
<a href="#">Asista Foundation</a>	✓	
Aspen Service Dogs		
<a href="#">Assistance Dogs for All (AD4A)</a>	✓	
<a href="#">Assistance Service Dogs BC</a>	✓	
<a href="#">AUDEAMUS</a>	✓	✓
<a href="#">Autism Dog Services Inc.</a>		
<a href="#">Canadian Alert Dogs, Inc.</a>	✓	✓
<a href="#">Canadian Intervention and Assistance Dogs</a>	✓	
<a href="#">Canine Support Services</a>	✓	
<a href="#">Epic Service Dogs (MSAR Standard)</a>		
<a href="#">Hope Heels Service Dogs</a>		✓
<a href="#">K9 Country Inn Service Dogs</a>	✓	
<a href="#">Kingston 4 Paws Service Dogs</a>		
<a href="#">Leash of Hope Assistance Dogs</a>		
<a href="#">Les chiens togo</a>	✓	
<a href="#">Maritime Specialty Service Dog Society</a>		
<a href="#">PAWS Fur Thought</a>	✓	
Pawsitive Horizons	✓	✓
<a href="#">Searchlight Service Dogs</a>		✓
<a href="#">Skunk Academy</a>	✓	✓
<a href="#">Sweet Charity Medical Assistance Dogs</a>	✓	✓
<a href="#">Thames Centre Service Dogs</a>		

<a href="#">The Canadian Veteran Service Dog Unit</a>	✓	
<a href="#">Vancouver Island Compassion Dogs Society</a>	✓	
<a href="#">Wounded Warriors Canada</a>	✓	✓

## Other Relevant Information, Resources, Publications, and Videos

The Department of National Defence Administrative Order and Directive DAOD 2005-0 was developed to accommodate service dog teams. The Directive states that, "Accreditation for service dog training institutions is provided by national and international organizations, including Assistance Dogs International, the International Guide Dog Federation, and Meghan Search and Rescue (MSAR).

For more information, please click on the embedded links.

- [2005](#)
- [2005-0, Service Dogs.](#)
- [2005-1, Service Dog Access to Defence Establishments](#)

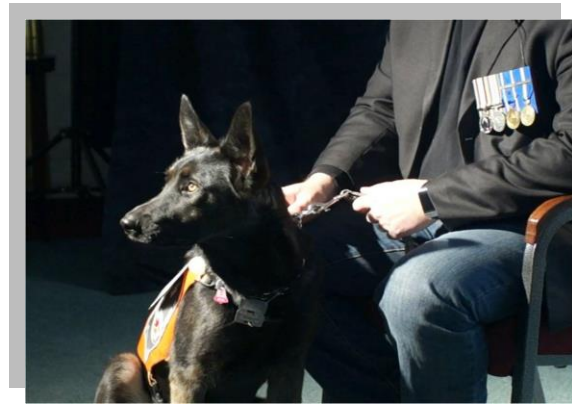
Because of the volume of assistance being requested by veterans and their families in the absence of National Standards of Canada (NSC) the Foundation (CFAS) established and named its military fund in honour of Major-General Lew MacKenzie (Rt'd) its esteemed patron, to support Canadian Forces Members, Veterans, and their Families.<sup>48</sup>

The fund later expanded to include First Responders and their Families.

Thanks to contributors like the True Patriot Love Foundation, Giant Tiger, and private donors, CFAS initiated and hosted two Canadian Military Service Dog Summits in 2013. The summits addressed the urgent need to access service dogs and to discuss the many roadblocks to acquiring a service dog, such as fragmentation, cost, systemic gaps, and the absence of National Standards of Canada. Public access with service dogs was also problematic.



*Even though the picture on the left shows two service dogs snoozing on the floor during the first summit make no mistake, they were on duty.*



<sup>48</sup> <https://www.cf4aass.org/the-major-general-lew-mackenzie-fund.html>

Presentations and discussions included topics like PTSD, the lived experiences of veterans with service dogs and their families, standardization, conformity assessment, and collaboration. The subsequent reports and videos highlight both events.

- [The First Canadian Military Service Dog Summit Report](#)
- [The Second Canadian Military Service Dog Summit Report](#)
- [The First Canadian Military Assistance Dog Summit Video](#)
- [The Second Canadian Military Service Dog Summit Video](#)

**Standards Council of Canada's publication [Consensus Standards - are going to the dogs?](#)** provides a historical backdrop.

#### **Other Summit Highlights - Animals in War Dedication Monument Presentation**

[Canada's Animals in War Tribute Video](#) was produced by CFAS in partnership with Navigator-Video Communications after the second summit to honour another one of CFAS' esteemed patrons and summit guest speakers Veteran Lloyd Swick. His leadership along with his devoted family, friends, volunteers, comrades and donors paid homage to the selfless service of animals in wars past and their continued dedication.

## Producers Survey



A producers' survey was made available from February 7, 2020, to March 16, 2020. Participation in the survey was voluntary. The survey announcement was shared with 40 organizations across Canada by email. A total of 16 representatives responded to the study, a response rate of 40%. However, many respondents chose to skip questions in various parts of the survey; thus, results are presented with the number of respondents and percentages for transparency and clarity purposes. One organization was missed because we learned about them after the survey was analyzed.

Employees	Volunteers
31% reported 1 or no Employees	13% reported no volunteers
44% reported 2 - 5 Employees	25% reported 1-5 volunteers or less
19% reported 6 – 30 employees	31% reported 6 – 30 volunteers
6% reported more than 30 employees	31% reported more than 30 volunteers

### Employment and Volunteerism

Out of the 16 organizations that participated in the survey, a total of 256 people are employees (range 0 – 172), and 1,249 (range 0 – 560) are volunteers. All but three organizations reported relying on more volunteers than employees.

### Populations Served and Scope of Services

When asked about the populations served, the majority reported serving children and youth. Fewer than 50% of the respondents reported providing services to “adults;” however, 27% offer services to seniors, and 33% reported serving either veterans, first responders, or both. Those who noted serving ‘other’ populations reported providing services to individuals with complex needs.

Population Served	Percent	Number
Visible disabilities	60	11
Invisible disabilities	93	11
Life-altering injuries	47	7
PTSD	80	4
Workplace injuries	40	5
Chronic illness	67	5
Other	20	8

When asked about their services' scope, more respondents reported serving individuals with invisible disabilities than visible ones.

Respondents that chose the ‘other’ category noted autism, among other challenging cases.

### Organization Types and Languages

Twenty-one percent of respondents reported they offer services in both English and French. Seven of 15 respondents said they do not provide services in both official languages; one noted there have been no requests for French assistance but would use an interpreter if needed. Another respondent said that they are recruiting French-speaking and indigenous trainers. Almost 30% of respondents were unsure whether services could be provided in both languages.

Forty-seven percent of the respondents identified as registered charities, 33% as for-profit businesses or sole proprietorships, and 7% as not-for-profit organizations. Two respondents chose 'other'; of those, one identified as an "owner-trainer" and another identified as a corporation.

Twenty-one percent of respondents reported they offer services in both English and French. Seven of 15 respondents said they do not provide services in both official languages. One person noted there had been no requests for assistance in French, but they would use an interpreter if needed.

Another person reported they are actively recruiting French-speaking and indigenous trainers. Almost 30% of respondents were unsure whether services could be provided in both languages.

### **Policy and Governance**

When asked whether their organization was a member of a service dog organization governed or led by fellow producers, five reported they were; another five said they were not, while three were unsure.

One respondent who was not a member of an organization commented, "We have been looking forward to a Canadian organization to provide guidance, [&] collaborative learning opportunities to support our work."

The vast majority (86%) of organizations reported having a policy and procedural manuals in place. Ninety-three percent of the respondents reported having a privacy policy.

### **Performance Monitoring and Quality**

The majority of respondents (79%) reported their organization uses performance indicators to monitor performance. The majority of respondents (92%) also say collaborating with clients to design and improve the services and programs they offer. When asked how often their organization follows up with consumers, all who responded reported follow up happens at least yearly (23%), with the majority reporting follow up more than once a year (77%). The "other" category provided further details such as some producers recertifying their clients for three consecutive years after certification, while some check-in every month or more frequently as needed to ensure efficacy throughout the team's lifecycle.

Nine of 12 respondents (75%) reported awareness of international best practices for consumer rights, and 42% said their organization had adopted the International Consumer Rights Charter to guide their work; 33% reported they had not, and 25% were unsure.

54% of respondents reported they don't work with a breeding program, and the majority (67%) wrote they do not work with rescue animals. One respondent noted that their organization has a couple of cases where trained service dogs were from dog rescue organizations. However, it is not a regular practice, and another specified that rescues were appropriate for a particular program of service they offer but not others. Two respondents reported they consider it risky to work with rescued dogs as there had been a high risk of failure in their experience.

Three respondents noted they are open to working with all breeds, while five reported breeds they don't work with or will only work with exceptional circumstances.

There was close to an even split between those who say they maintain ownership of the service animals (5 participants) and those who do not (6 participants). Participants noted maintenance of ownership varied based on the nature of service and client circumstances.

Participants rated the importance of various factors for ensuring a sustainable service dog training industry in Canada. Developing a common language, establishing industry standards, and forming credentialing criteria for professionals were most frequently cited as important or very important. Responses are summarized in the table below.

<b>Questions and Answers *Some respondents' skipped a few questions.</b>						
	Somewhat important or not important		Important		Very important or Essential	
<b>Questions</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>	<b>#</b>	<b>%</b>
<b>Service dog fund to help clients in financial need to cover costs associated with their service dog</b>	3	25%	1	8%	8	67%
<b>Developing a common language around terminology related to this profession (e.g., service dog, assistance dog, accreditation, standards, certification, professionals, assessors).</b>	1	8%	0	0%	11	92%
<b>Establishing consensus-based Canadian industry standards.</b>	1	8%	1	8%	10	83%
<b>Forming credentialing criteria for assistance/service dog trainers, assessors, and related career paths.</b>	2	17%	0	0%	10	83%
<b>Assessing the pros and cons of third-party conformity assessment.</b>	2	17%	2	17%	7	58%
<b>Assessing the pros and cons of third-party accreditation of service dog organizations.</b>	2	17%	3	25%	7	58%
<b>Participating in an annual Canadian conference.</b>	3	25%	6	50%	2	17%
<b>Forming a Canadian speakers bureau to educate the public.</b>	2	17%	5	42%	5	42%
<b>Contributing to the content of an online portal to showcase your brand in the marketplace.</b>	7	58%	0	0%	5	42%
<b>Co-creating a Canadian advocacy strategy to remove accessibility and accommodation barriers of assistance/service dog teams.</b>	1	8%	3	25%	8	67%

<b>Professional development.</b>	2	18%	3	27%	6	55%
<b>Working together to establish industry-specific Canadian National Occupation Classifications (NOC).</b>	3	25%	3	25%	6	50%
<b>Accessing affordable industry group insurance.</b>	1	8%	3	25%	8	67%



# A Snapshot of Canada's Service Dog Industry

## Privacy Policy

9 (26%) mentioned having a privacy policy

## Revenue

19 (54%) posted online the average revenue in 2019 was \$1,340,727.00

## Service Fees

16 (46%) offer free services 19 (54%) charge for their services

## Business Models

2 (6%) independent trainers, 7 (20%) for-profit business 7 (20%), non-profit 16 (45%), 10 (29%) charitable organizations

## Populations Served Age Groups

63% offer services to all age groups 29% offer specific services to children/youth 8% to adults and seniors

## Types of Service Dogs

Seizure alert, hearing loss, mobility support, PTSD, psychiatric support, autism support, diabetes alert

13 (37%) train service dogs, whereas 22 (63%) provide trained service dogs to those who are in need

13 (37%) are members of a service dog organizations coalition

14 (40%) publish their private company standards on their website

## Service Dog Team Benefits

Mutually Beneficial



Improved Lifestyle



Stress Reduction



Behavior Modification



Better Perspective



More Active



Average Years in Business

13

Canine-Assisted Living  
A New Leash on Life

2019 - Sourced from 35 Service Dog Organization Websites

The Canadian Foundation for Animal-Assisted Support Services [www.cf4aass.org](http://www.cf4aass.org) ©

## A Canadian Service Dog Industry SWOT Analysis - Takeaways



# A Canadian Service Dog Industry SWOT Analysis



### Internal

#### Strengths

- Evolving Industry
- Extensive networks
- Increasing interest in collaboration and stakeholder engagement
- Mutual interest in standards development and quality assurance
- Niche markets
- Some consumer engagement
- Subject matter expertise
- Versatile services

#### Weaknesses

- Duplicated efforts
- Fragmentation
- Industry framework gaps
- Long waiting lists
- Need more consumer and other stakeholder involvement
- No common vocabulary or national, international consensus-based standards
- Strained communication

#### Opportunities

- Augment industry strategies to meet marketplace demand
- Co-create a suite of minimum industry standards
- Collaborate with a range of stakeholders to fill industry gaps and resolve systemic issues
- Develop National Occupational Classifications
- Enhance consumer involvement
- Explore expansive career options
- Invest in quality assurance and industry recognition
- Market diversification
- National advocacy and education outreach

#### Threats

- Absence of a Canadian industry strategy to map and measure progress and impact
- Change in market trends
- Impeded progress due to misunderstandings
- Inconsistent vocabulary
- Public safety and industry credibility
- Rising costs
- Sustainability
- Systemic issues

### External

## Closing Remarks

The Covid-19 pandemic has altered life as we know it, especially as we encounter the repercussions of social distancing. However, the isolation experienced by thousands of Canadians with disabilities, life-altering injuries, chronic illness, and even their family members is a harsh daily reality – a societal crisis that often goes unnoticed.

Change is the one thing we can count on whether we choose to initiate it or not. The Covid-19 pandemic is a prime example. But when change comes in the form of a crisis, it can also become the catalyst for inventing new ways to do old things differently and sometimes even better.

Co-creating a consumer-driven Canadian Service Dog Industry may appear to be too ambitious and risky given the projected complexities. Nevertheless, the isolation, inequity, accessibility, and accommodation barriers faced by a growing number of Canadians of all ages with service dogs and those in need of one are the one's paying the price for this crisis today and, if nothing changes - tomorrow.

In the words of Chief Dan George, *“If you talk to the animals, they will talk to you, and you will know each other. If you do not talk to them, you will not know them, and what you do not know, you will fear. What one fears, one destroys.”*



## Unleashing Potential Phase II

### A Call to Action

***“We may not have it all together, but together we have it all.”***

*Author Unknown*

Phase II entails a brief post-study national survey. The study's purpose is to hear from consumers, producers, regulators, other stakeholders to determine the level of interest in participating in Phase III, the development of a three-year work plan. The work plan would focus on enhancing Canada's Service Dog Industry to serve Canadians better while preserving the credibility of skilled and devoted service dog trainers and service dog training organizations.

May the pandemic's impact be a reminder that we are in this together, and together, we have it all.

To participate in Phase II – the post-study survey [please click here](#).

---

## Appendices A – Disability Definitions and Accommodation Continued

### Canada Pension Plan Disability Benefits - What we mean by "disability"

To qualify for disability benefits (disability pension and post-retirement disability benefit) under the Canada Pension Plan (CPP), a disability must be both "severe" and "prolonged," and it must prevent you from being able to work at any job regularly. Severe means that you have a mental or physical disability that regularly stops you from doing any type of substantially gainful work. Prolonged means that your disability is long-term and of indefinite duration or is likely to result in death.

### Department of National Defence

#### DND-ADOD-2005-0-Service-Dogs - disability (déficience)

Any previous or existing mental or physical disability and includes disfigurement and previous or existing dependence on alcohol or a drug. (Section 25 of the Canadian Human Rights Act)

### Duty to Accommodate

Duty to accommodate (obligation de prendre des mesures d'adaptation) The obligation of the Department of National Defence and the Canadian Armed Forces to adopt measures to eliminate disadvantage to current and prospective Department of National Defence employees, Canadian Armed Forces members, and applicants to the Canadian Armed Forces, as a result of a rule, policy, practice or barrier that has or may have an adverse impact on individuals or designated groups protected under the Canadian Charter of Rights and Freedoms, the Canadian Human Rights Act or the Employment Equity Act. (Defence Terminology Bank record number 694596) medical practitioner (médecin).

### Veterans Affairs Canada

Disability Assessment "is the sum of the Medical Impairment rating and the Quality of Life rating. In accordance with the *Pension Act* and the *Veterans Well-being Act*, disability is defined as the loss or lessening of the power to will and to do any normal physical or mental act." As impairment refers to a loss of function that can be measured and documented objectively, disability, as defined in the Pension Act and the Veterans Well-being Act, exceeds the physical limitations of impairment and thus requires both medical (impairment) and non-medical (QOL) information to determine the final assessment of disability."

### An Act to ensure a barrier-free Canada

Disability means any impairment, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment — or a functional limitation — whether permanent, temporary or episodic or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society. (handicap)

**Duty to Accommodate:** [See Section 3 Compliance with Regulations](#)

## World Health Organization

The World Health Organization is a specialized agency of the United Nations concerned with international public health.

Disability is defined by the World Health Organization (WHO) as the temporary, prolonged, or permanent reduction or absence of the ability to perform certain commonplace activities or roles, sometimes referred to as activities of daily living.

### Models of Disability: Types and Definitions

Varying perceptions influence views when attempting to define 'disability.' Notably, many are viewed through specific cultural, political, and legal, medical, human rights, social, economic, and public health lenses. Disabled World is one of many sources that provide additional insight into the complexities of defining disability through models of disabilities that further fuel ongoing debates, views, and assertions when attempting to inspire and initiate change.

Author: Disabled World, Contact: [www.disabled-world.com](http://www.disabled-world.com), Published: 2010/09/10 (10 years ago) - Updated: 2019/12/06 (3 months ago).

### Key Points

- » The spectrum model refers to the range of visibility, audibility, and sensibility under which mankind functions. The model asserts that disability does not necessarily mean a reduced spectrum of operations.
- » Disability rights movements, activists, scholars, and practitioners construct debates around the two main models, social and medical, of understanding of disabilities.

### Main Digest

Disability studies is an academic discipline that examines and theorizes about the social, political, cultural, and economic factors that define disability. The disability rights movement, scholars, activists, and practitioners construct debates around two distinctly different models of understanding of disability - the social and medical models of disability.

Many scholars in disability studies describe a medical model of disability that is part of the general biomedical approach. In this model, disability is considered an entirely physical occurrence, and being disabled is a negative that can only be made better if the disability is cured. The person is made "normal."

Many disability rights advocates reject this and promote a social model in which disability is a difference - neither a good nor a bad trait. To learn more about models of disability, please visit <https://www.disabled-world.com/definitions/disability-models.php>

## Conflict-Free Statement

*In keeping with The Canadian Foundation for Animal-Assisted Support Services (CFAS) code of ethics and standard operating procedures, a press release dated November 8, 2019, was released to announce the launch of this study and its funding source.*

*To maintain transparency, as well as to ensure the integrity of the study the CFAS hereby confirms that it has remained conflict-free, by entering into a written agreement with both funders, namely Courageous Companions and MSAR Service Dogs, before receiving funding or commencing the study.*

*Though CFAS collects information in good faith and reviews the sourced information for any untrue material facts or inaccurate information, CFAS does not represent that the information from third party sources is accurate or complete.*

*As a result, CFAS shall not be in any way responsible for any indirect, special or consequential damages that may arise to any person, organization, or business from any error in the information contained in this report nor does it guarantee or assume liability for any omissions of the information contained therein. Information contained therein cannot be the basis for any claim, demand or cause of action. This report and the information contained herein does not constitute a scientific publication or legal opinion and shall not carry any evidentiary value whatsoever.*

*2020 Copyright©*