

# **A Path to Veterans' Service Dog Standards**

## **PART I: THE NEED FOR NATIONAL STANDARDS**

In May and June of 2021, the House of Commons Standing Committee on Veterans Affairs (ACVA) embarked on a 4-meeting study on the efficacy and use of psychiatric service dogs by Canadian Armed Forces veterans to alleviate the symptoms of post-traumatic stress disorder (PTSD). The Committee also considered the resources required by the Department of Veterans Affairs (VAC) to implement access to psychiatric service dogs, the challenges associated with housing faced by veterans with a psychiatric service dog; and what should constitute minimum national standards for the training of PTSD psychiatric service dogs.

Unfortunately, the spring session of House of Commons adjourned before a comprehensive report could be considered by all members of ACVA. Nonetheless, Conservative Party of Canada members of the Committee believe that Veterans, their families, and their caregivers deserve a definitive statement of principle from the Official Opposition on the benefits of psychiatric service dogs and why Canadian national standards are urgently required to improve equality of access for all Veterans in need.

### **The Benefits of Service Dogs**

Regardless of the nature of their work with service dogs, a point of near unanimity from witnesses concerned positive impacts of service dogs on the lives of veterans. It was clear to Conservative members of ACVA that, although further research is required to ensure federal service dog policies evolve to meet changing needs, enough research has been completed to warrant the swift implementation of national standards. Witnesses highlighted both anecdotal and clinical evidence to suggest the benefits of trained service dogs outweigh the risks:

**“An extremely important fact is that to date there is no known case of a veteran with a fully trained service dog who has gone on to self-harm. These dogs are a valuable therapeutic adjunct to the war on PTSD.”<sup>1</sup>**

In addition to improved physical health and a decreased dependence on prescribed medication, it was widely stated that service dogs have a profound impact on veterans' quality of life:

**“In our experience, SDs (and animals generally) can be an entry point for relationship development with an individual seeking and receiving care. The SD is one pathway into the Veterans' lives. In the therapy dog research realm, we simplistically state based on our research findings and practice that a dog can ‘open the human heart a little bit’.”<sup>2</sup>**

**“I think what that dog is giving to the veteran is the support and opportunity to be able to function in day-to-day life. It might be establishing routines, supporting the veteran, having daily routines set up and being able to get to their appointments, resuming some of the**

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<sup>1</sup> ACVA, *Evidence*, 7 June 2021, 1550 (Mr. Medric Cousineau (Co-Founder, Paws Fur Thought)).

<sup>2</sup> Dr. Colleen Dell & Dr. Darlene Chalmers, “June 8, 2021 Briefing Note,” p. 3, <https://www.ourcommons.ca/Content/Committee/432/ACVA/Brief/BR11436038/br-external/ServiceDogResearch-e.pdf>.

**activities that a veteran may have done previously in their life before their injury—and it's mutual.<sup>3</sup>**

Conservative members of ACVA believe that service dogs have enormous potential to impact the 'trust' factor between veterans, their social circle, and their points of contact with VAC. It is often reported that support services struggle to provide assistance to the veterans they are there to help. Service dogs can play a significant role in improving communication between veterans and their case workers, as well as service providers.

### **The Urgency of National Standards for Service Dogs**

Witnesses offered varied perspectives on why the Canadian General Standards Board failed to complete its work in developing national standards for service dogs. Regardless of the true reason(s), going forward, Conservative members of ACVA believe that stakeholders should work together in a spirit of common purpose: for the improvement of Veteran well-being. The urgency for national standards was plainly communicated by witnesses throughout ACVA's study.

### **Accessibility**

National standards are needed to improve equality of accessibility for service dog handlers. Conservatives were troubled by witnesses who spoke to denials of service due to the use of a service dog:

**"Service dogs can also be a barrier for veterans seeking and receiving care, and these concerns reside primarily at the systems level. A veteran with a service dog being denied counselling or service at a counselling office is a concern. A veteran being denied housing because of a service dog is a concern. There seems to be no standard experience across the country."<sup>4</sup>**

National standards will only help to improve uniformity of service for those requiring the assistance of a service dog. A denial of services critical to the health or wellbeing of Veterans – especially if experienced to a greater degree in some areas of Canada compared to others – is unacceptable.

### **Inconsistencies between provinces**

In addition to the harm that an overall denial of service has on Veterans and their wellbeing, ACVA heard several witness interventions outlining the negative effect of standards currently employed in individual provinces. According to Veterans and their advocates, some provincial regulations have resulted in a further lack of accessibility, inconsistencies in training, and the failure to sufficiently enforce standards:

**"On January 1, 2016, the B.C. legislature put into force the B.C. Guide Dog and Service Dog Act. This act does not recognize any service dog teams or providers who were not trained or who were not affiliated with the ADI or IGDF, and it is in complete violation of the veterans charter**

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<sup>3</sup> ACVA, *Evidence*, 28 May 2021, 1510 (Dr. Darlene Chalmers (Associate Professor and Associate Dean of Undergraduate Studies, University of Regina, As an Individual)).

<sup>4</sup> House of Commons, Standing Committee on Veterans Affairs [ACVA], *Evidence*, 28 May 2021, 1450 (Dr. Darlene Chalmers (Associate Professor and Associate Dean of Undergraduate Studies, University of Regina, As an Individual))

**of rights, the Canadian Human Rights Act and the UN Convention on the Rights of Persons with Disabilities. This act prevents me from obtaining housing in B.C. and continues to be a huge barrier for veterans who need housing, as well as a barrier to accessing public spaces. I am not allowed access to any provincial offices, to travel on board passenger decks of BC Ferries with my service dog or to take public transit. This is one of the main driving forces that forced me, in May 2018, onto the streets. It was because I don't fit the criteria for the B.C. Guide Dog and Service Dog Act.”<sup>5</sup>**

Due to its size and scope, Canada requires a uniformity of standards for training, accessibility, and enforcement. Veterans are not being served well by a patchwork of standards that vary from province to province.

### **Inconsistencies in training and an unregulated industry**

The lack of national standards has created a vacuum in training and regulation. As individual trainers and providers strive to meet demand, witnesses highlighted the fact that the welfare of Veterans is often caught in the middle of competing visions:

Cpl. Christopher Lohnes of the Audeamus Service Dog Program referred to a client who had been assigned a service dog under the pretence that it had been fully trained to meet the standard of a service dog. It was only upon beginning owner-animal training that it was discovered that the client had little knowledge of the service dog's capabilities. Cpl. Lohnes attributed this to a failure to train the dog sufficiently before its assignment to the owner.<sup>6</sup>

Conservatives believe that national standards should be developed with a common purpose top of mind for all stakeholders. Improved Veteran wellbeing is not achieved through inconsistency in information and training. The incorporation of best practices from all sectors should underline stakeholders' work in developing national standards.

### **Benefits Outweigh Risks**

A thoughtful consideration of witness testimony has made it clear to Conservative members of ACVA that the need for national standards is critical. The Official Opposition believes that veterans should be able to benefit from service dogs trained to uniform standards Canada-wide. In the view of some witnesses, these standards will surely contribute to a reduction of fraud and improved uniformity of access:

**“...the current situation in this environment in the service dog industry is very fragmented, and there's no rhyme or reason. Anybody can hang a shingle on their door. That's why once a standard is actually developed and published by the Standards Council of Canada, there will be an impartial standard that everybody helped to produce, that all of the various stakeholders had an opportunity to produce.”<sup>7</sup>**

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<sup>5</sup> ACVA, *Evidence*, 14 June 2021, 1615 (Mr. William Webb (As an Individual)).

<sup>6</sup> ACVA, *Evidence*, 28 May 2021, 1430 (Corporal Christopher Lohnes (Royal Canadian Mounted Police, Audeamus Service Dog Program)).

<sup>7</sup> ACVA, *Evidence*, 14 June 2021, 1750 (Ms. Joanne Moss (Chief Executive Officer, The Canadian Foundation for Animal-Assisted Support Services)).

## **PART II: CURRENT STANDARDS FOR SERVICE DOGS IN CANADA**

At the present time, there are few options for Veterans to have a trained service dog certified. The committee heard from the following organizations that provide trained service dogs: ADI (Assisted Dogs International), Canine Companions (MSAR), Wounded Warriors and Audeamus appeared at committee, while other groups and individuals have submitted written briefs.

As we have heard in committee, there was no consensus when the Canadian General Service Board (CGSB) attempted to bring the industry together to create Canadian Standards. The fact that they did not accept the invitation to appear from ACVA was disappointing as their witness account could have shed light on the disfunction and how, in the future, the same issues could be addressed. Conservatives feel that the CGSB could have contributed significantly in successfully laying out another route to having a National Service Dog Training standard in Canada.

Ms. Garrett-Baird added that provincial jurisdictions also played a part in the establishment of national standards, though she did not say if provinces sent representatives to the CGSB discussion.

The Committee did not receive testimony from other countries, though both Ms. Garrett-Baird and Mr. Svenson of VAC both gave information on the United States and Australia on their progress to establish standards for service dogs. Ms. Garrett-Baird remarked on progress in the United States.

**“The United States, as noted, is very well advanced in research and the benefits related to service dogs. Currently, the United States Department of Veterans Affairs service dog veterinary health benefit provides service dogs to veterans for issues relating to hearing, vision and mobility.”<sup>8</sup>**

On Australia, Mr. Svenson added:

**“Australia is currently conducting a study. They started in 2018. It is a four-year study looking at how assistance dogs—the term they use is “psychiatric assistance dogs”—can complement other evidence-based treatment. They were also looking at practical implementation challenges for a formal program. That study is still ongoing.”<sup>9</sup>**

There are several organizations that currently offer service dogs; their training methods and standards have been established in different manners. To summarize their processes into a short statement does not do the work they do justice. The following organizations appeared or submitted information to ACVA:

**Assistance Dogs International (ADI)** has created standards based on assistance dog standards that were in place. Manuals and documents are only available to accredited members or programs and on a case by case basis. National Service Dogs is accredited by ADI. (Appeared at ACVA, June 7, 2021)

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<sup>8</sup> ACVA, Evidence, 12 May 2021, 1750 Ms. Crystal Garrett-Baird (Director General, Policy and Research, Department of Veterans Affairs)

<sup>9</sup> ACVA, Evidence, 12 May 2021, 1755 Mr. Nathan Svenson (Director, Research, Department of Veterans Affairs)

**Audeamus** has been doing research into PTSD service dogs and provides specially trained dogs to support Veterans, First Responders and War Correspondents. Based on evidence and research, dogs and partners participate in curriculum-based training. They continue research and advocacy for best practices in the industry. (Appeared at ACVA, May 28, 2021)

**Canadian Association of Professional Dog Trainers** support the statement that any standard developed should include a requirement to use Humane Hierarchy Methodology best training practices.

**Canadian Foundation for Animal-Assisted Support Services (CFAS)**, an impartial organization promoting the animal-assisted sector. CFAS has partnered with the Human Resources Standard Organization to develop Canadian national standards in light of the dissolution of the CGSB meetings. CFAS seeks to cut through the conflicts of interest to have standards established. (Appeared at ACVA, June 14, 2021)

**Meliora Service Dogs** uses science-based and compassionate medical service dog training and, in several provinces, uses the “Canine Good Citizen” test before dogs can be recognized for use. (Appeared at ACVA, June 14, 2021)

**MSAR (Mehgan Search and Rescue)** is a First Nations based organization in Manitoba specializing in search and rescue, service dog and working dog training. Training is based on a six step, 72 task training course. MSAR is the certifying authority for Courageous Companions. (Provided a written submission to ACVA)

**Wounded Warriors Canada (WWC)** is a national mental health service provider and recently partnered with VAC to screen, intake, train and pair dogs with handlers. WWC partners with service dog providers, like Paws Fur Thought, across Canada to fund and partner dogs with Veterans. Standards used by WWC were influenced by the work of the CGSB and provinces that have established standards. (Appeared at ACVA, May 28, 2021)

### **PART III: THE ROLE OF GOVERNMENT**

As a country and as a people, Canadians have always appreciated the service of our brave men and women in uniform. They answered the call, fought to ensure we remain free and promoted our values of freedom, tolerance, and the rule of law around the world.

However, this long-held appreciation does not mean we can't do more to support our Canadian Armed Forces when their service is complete. In fact, there is always more we can and must do. In recent years, conversations surrounding the realities of the mental health issues, PTSD and PTSI experienced by our Canadian Armed Forces veterans have evolved and so too have the treatment options for these issues.

Over the course of four meetings, the Committee heard from several witnesses with direct knowledge, experience and expertise in the provision of service dogs and the lack of national standards.

While recognizing that the federal government plays a direct role in the provision of services to veterans, it was clear through the testimony heard that with respect to the issue of national standards for service dogs, the government, specifically Veterans Affairs Canada (VAC), should leave this process to independent authorities.

Notably, Mr. William Webb stated repeatedly throughout his testimony that:

**“VAC needs to stay out of this independent process completely and allow it to proceed unimpeded.”<sup>10</sup>**

On this issue, Mr. William Webb also stated:

**“The service dog industry cannot be relied upon to make a national standard.”<sup>11</sup>**

The testimony from representatives of VAC with respect to the efficacy and need for service dogs was inconsistent, at best, in relation to testimony the Committee heard from veterans on the same subject matter. The inconsistency, unfortunately, represents a government agency that is severely out of touch with the veterans it is mandated to serve.

Dr. Alexander Heber, a VAC official, testified that:

**“First of all, it is true that having a psychiatric service dog does not in any way have the evidence behind it to call this a treatment or a therapy, in fact. We consider it more as what we might call an adjunctive treatment or a complementary treatment to the evidence-based treatments for PTSD, major depression or whatever condition the dog is helping the veteran with.”<sup>12</sup>**

This quote directly contradicts evidence the Committee heard from veterans and organizations and speaks to the need for more evidence-based research on the part of the Government of Canada and VAC.

here is evidence that is clear and cannot be understated: PTSD Service Dogs save lives and save families.

The Government of Canada should also be regularly comparing findings with our international partners on the efficacy of service dogs and their impact on the lives of our veterans.

Ms. Crystal Garrett-Baird, Director General of Policy and Research at VAC testified that:

**“The Australian Department of Veterans' Affairs is conducting a four-year study, which began in 2019, to examine the impact of service dogs for veterans with post-traumatic stress disorder.”<sup>13</sup>**

As previously referenced by Ms. Sheila O'Brien, the Veterans Administration in the United States has completed and released a study in March 2021 on this issue. This study produced clear findings that the Government of Canada must examine.

Having reviewed the testimony from veterans directly and from veterans' organizations, there is evidence and it is clear: PTSD Service Dogs save lives, save families, and this cannot be understated. The positive impacts of service dogs on the lives of veterans, including a reduction in suicidal ideation should be taken seriously and acted upon. The Committee has also heard from veterans and veterans' organizations that VAC is demonstrably not the appropriate

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<sup>10</sup> ACVA, Evidence 14 June 2021, 1615 Mr. William Webb

<sup>11</sup> ACVA, Evidence, 14 June 2021, 1615 Mr. William Webb

<sup>12</sup> ACVA, Evidence, 12 May, 2021, 1715, Dr. Alexandra Heber (Chief of Psychiatry, Health Professionals Division, Department of Veterans Affairs)

<sup>13</sup> ACVA, Evidence, 12 May 2021, 1655, Ms. Crystal Garrett-Baird (Director General, Policy and Research, Department of Veterans Affairs)

authority to embark on the important and necessary endeavour of developing national standards for service dogs – this should be respected.

#### **PART IV: RECOMMENDATIONS**

1. Psychiatric Service Dogs have the potential to be a game changer in the lives of our veterans and their families. We owe it to Veterans to listen intently to their anecdotal evidence. There is also a need for an education campaign to inform health care professionals about the role of service dogs, and their benefits, in Veterans' lives.<sup>14</sup>
2. VAC's first priority must be psychiatric service dogs for veterans. Compassion and empathy toward Veterans with PTSD or any other mental illness due to brain injuries or trauma must be the first priority in setting standards.<sup>15</sup>
3. Participants on the standards committee itself must not have a financial interest – charitable or business – in providing, training or testing service dogs. Standards must be set by an objective body that does not include actual trainers, suppliers, accreditors, VAC or organizations that receive funding from VAC to facilitate providing service dogs to veterans.
4. Standards should be 'open' to the practices of different groups. A team approach should be adopted for the development of made-in-Canada standards that fit within the context of provincial and territorial human rights service dog policies.<sup>16</sup>
5. The standards body should aim to develop national standards through a two-pronged approach; an approach that considers both standards of training as well as the performance of service dogs and their teams post-training. There is not a one-size-fits-all solution.<sup>17</sup>

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<sup>14</sup> For rationale, see: ACVA, *Evidence*, 28 May 2021, 1450 (Dr. Darlene Chalmers (Associate Professor and Associate Dean of Undergraduate Studies, University of Regina, As an Individual)).

<sup>15</sup> For rationale, see: ACVA, *Evidence*, 14 June 2021, 1630 (Mr. Marc Lapointe (Certified Trainer, Meliora Service Dogs)).

<sup>16</sup> For rationale, see: ACVA, *Evidence*, 28 May 2021, 1420 (Brigadier-General (Retired) Peter Holt (Audeamus Service Dog Program)); ACVA, *Evidence*, 28 May 2021, 1450 (Dr. Darlene Chalmers (Associate Professor and Associate Dean of Undergraduate Studies, University of Regina, As an Individual)).

<sup>17</sup> For rationale, see: ACVA, *Evidence*, 7 June 2021, 1550 (Ms. Laura A. MacKenzie (Owner and Master Trainer, K-9 Country Inn Working Service Dogs)); ACVA, *Evidence*, 7 June 2021, 1600 (Ms. Danielle Forbes (Executive Director, National Service Dogs)).