



June 23, 2021

TO: Bryan May, MP. Chair, Standing Committee on Veterans Affairs

**FROM: J. Brian Archer, President & Director,
Citadel Therapy Canine Society (Citadel). Vancouver, BC**

RE: Committee Research related to a National Standard for Service Dogs

Via E-Mail.

Reference: Your executive assistant's conversation with Chipman Kean on Monday, June 14, 2021 and any additional communications that you might have received.

We would like to begin by thanking you and the committee members for affording Citadel the opportunity to provide a submission related to the above topic. Citadel Canine is Canada's longest-running, mission-specific PTSD service dog provider. Unlike some of the other Canadian-based providers, Citadel was established solely for the purpose of working with military veterans, first responders, nurses and corrections officers. Most of the other large Canadian PTSD service dog providers financially compensate their administrative employees with a substantial amount of funding. Citadel, for the most part, operates utilizing a dedicated team of volunteers, enabling us to provide wonderful dogs and/or successfully train teams in a highly cost-effective manner. Since our incorporation in 2012, we have placed dogs or supported teams in every Province except Prince Edward Island.

It is our understanding that Veterans Affairs Canada (VAC) is currently examining options related to the direct funding of PTSD service dogs, and possibly funding the overall management (including a National Standard) of a service dog program for military veterans and RCMP members. We would like to provide your committee with the following important pieces of information as they conduct their research:

1. There is a possibility that the committee may encounter arguments opposed to the stated effectiveness of a service dog for those individuals dealing with the challenges associated with PTSD. The committee can be absolutely assured that a candidate will experience a significant improvement in their mental and physical health condition. The following steps should be conducted prior to paring a candidate with a dog:
 - a thorough consultation and written prescriptive referral from a licensed health care professional.
 - a proper and thorough assessment during the candidate's Intake process.This improvement also has a dramatic positive collateral impact on the candidate's immediate family and close circle of friends and associates.

2. Your committee is now informed that there is no “National Standard” for service dogs in Canada. This is the key topic that has bedeviled almost every outsider group attempting to create a common legislated public policy to manage or govern service dogs and their handlers. It is the opinion of Citadel, and our cross-Canada network of highly capable dog trainers, that the “Public Access” challenge is the issue that requires the most attention. This must also be part of the VAC’s vetting process when looking at the options of financial supporters of service dogs.

It is our opinion, based on considerable first-hand experience, that rather than spending time on the development of an overall national standard for the training and delivery of service dogs, everyone involved (donors, training schools, individual service dog trainers, handler teams, and local government agencies etc.) would be far better served if there was instead a concerted effort to create a set of National Certification Testing Standards. In a manner almost identical to the long-established practice for obtaining a personal driver’s licence, this certification and testing standard would then be applied across the board to all service dog teams requiring public access privileges, regardless of their source. In addition, to preclude any possibility of a conflict of interest, no special privileges would be granted to any producer of service dogs to train and then certify their own teams.

The certification test should be created by a group of highly qualified service dog trainers and certified dog behavior consultants (but not service dog schools). The group creating the National Service Dog Certification Test should also include key stakeholders such as public transportation entities, the restaurant industry, large real estate landlords, and representatives from Provincial regulatory agencies. It should also include organizations such as the Canadian Foundation for Animal-Assisted Support Services (CFAS), which will help ensure that the important personal mobility challenges of those with physical disabilities are being recognized when developing the final testing template.

If such a standard certification test were created, then large funding agencies, such as VAC and larger donors would be assured that the funding they direct towards service dogs will in fact be supporting handler teams that have been independently tested by government appointed or contracted examiners, who themselves have a high degree of experience and familiarity related to the input from the dog trainers within the certification standards development group.

3. During the Standing Committee’s research, you have encountered information relating to one group of service dog training schools that fall under the umbrella of the USA-based **Assistance Dogs International (ADI)**. This written submission would also like to introduce Parliamentary members of the Committee to the **Canadian Assn. of Service Dog Trainers (CASDT)**. CASDT is a federally incorporated organization that is comprised solely of Canadian service dog trainers. Members of CASDT include Canada’s two largest not-for-profit (CRA-registered) PTSD service dog training schools: **Courageous Companions Inc.**, based in Edmonton, and **Citadel Therapy Canine Society**, based in

Vancouver. CASDT members also include individual service dog trainers, and **MSAR Service Dogs**, a large training operation based in Winnipeg. MSAR can likely lay claim to producing the very first PTSD service dog paired with a Canadian military veteran. MSAR is also unique with respect to the fact it is the only major Canadian service dog provider directed by aboriginal Elders, and First Nations leadership. Also included within the CASDT membership group is a service dog trainer based in Nova Scotia. That individual and her assistants have been successfully producing wonderful medical service dogs for over 20 years. While this submission will in no manner argue the comparative merits of either umbrella organization, it is important to note here that at present there are no outside, independent agencies that can “accredit” or “certify” either ADI, or CASDT.

4. As part of your Committee’s research, a carefully examination of the costs associated with producing properly trained service dogs, and ultimately creating successfully tested and certified service dog teams should be undertaken. It is common knowledge that several of the Canadian service dog schools, that are members of ADI, are quoting costs ranging from \$25,000. to \$35,000. per dog. (2) On the other hand, schools that are members of CASDT can and in fact are producing successfully certified teams for just a fraction of those amounts. As mentioned briefly in the introduction to this submission, it is our understanding that VAC is being urged to fund the provision of service dogs for individual military veterans and RCMP members. In recognition of this, we in turn would highly recommend that members of the Standing Committee, and staff within VAC carefully investigate the costs associated with a variety of service dog providers within Canada. It is also our understanding that VAC might be considering outsourcing the funding of service dogs to a single outside vendor, or service dog program manager. If that is the case, then we would request that CASDT be included in those discussions, and also be afforded the opportunity to submit a comprehensive Proposal if in fact this idea moves forward.

Note (1): The information and suggestions included within Item 2. of this submission were provided by Mr. Kean and Mr. Archer to Government of Ontario representatives, at their request. Two meetings were held in 2019 (one in person, and one via teleconference), where Ministerial aides, and then senior officials from the Departments of Education, Health, the Attorney General, and Seniors & Persons with Disabilities attended. One meeting was convened and Chaired by Minister Cho. The suggestions were received in a very positive manner, and had it not been for the Pandemic we all have had to deal with since March of 2020, there likely would have been legislation, or policies already introduced within Ontario to reflect these suggestions.

Note (2): A presentation was made to RCMP “E Division” by Pacific Assistance Dog Society (PADS) based in Burnaby, BC. PADS is a key Canadian member of ADI. The cost to produce a PADS service dog was included within that presentation. A power point screen shot taken by an RCMP member attending that presentation was provided to Citadel, and it clearly denotes \$35,000. as the cost for a single PADS dog. By comparison, this is nearly five times the cost to produce a fully certified Citadel PTSD-OSI service dog team.

To conclude, we thank the members of the Standing Committee on Veterans Affairs for taking the time to review this submission. If any member of the committee requires more information or input related to their research on service dogs, or if there are any additional questions that might have arisen as a result of this submission, then we welcome those inquires, and they may be directed towards:

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J. Brian Archer. **Citadel Therapy Canine Society**. Vancouver, BC. 604-837-4884

Respectfully submitted by,

JB Archer

J. Brian Archer,
President.

CC'd to: John Dugas, CD2 Master Warrant Officer (retired). Chairman, CASDT, and Chairman, Courageous Companions, Edmonton, AB

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Member: Canadian Assn. of Service Dog Trainers