

Canadian General Standards Board Service Dog Team Standard

A Failed Process

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Executive Summary

Key Topics:

- Canadian General Standards Board (CGSB)
- Service dogs, guide dogs
- Veterans Affairs Canada (VAC)
- Post Traumatic Stress Disorder (PTSD)
- Assistance Dogs International (ADI)
- International Guide Dog Federation (IGDF)

Issue:

CGSB was asked to develop a standard related to PTSD dogs; however, they expanded their scope to include all guide dogs and service dogs in Canada. They released a draft standard for public comment and there was a significant negative response. Advocates want the draft standard withdrawn and the standard development process stopped.

Background – Chronology of Events:

Starting in 2005, American service dog schools started placing dogs with veterans returning from Iraq and Afghanistan. Many found that their dogs not only mitigated physical disabilities, but were also helping them cope with PTSD.

Since that time, ADI, the global service dog accreditation organization, spearheaded efforts to develop standards and accreditation processes specifically for PTSD dogs. Once the standards are ratified by the ADI membership, any service dog organizations seeking accreditation for programs to place dogs with handlers who have military-related PTSD will have to meet these standards. This includes the eight ADI-accredited schools in Canada.

In Canada, beginning in 2013, VAC began responding to advocates regarding PTSD dogs for Canadian veterans. At the same time, a private sector organization asked CGSB to develop standards in this area.

In May 2014, Parliament's Standing Committee on Government Operations and Estimates was advised of CGSB's intention to pursue a standard for PTSD dogs. By the Spring of 2015, after a series of meetings and consultations, CGSB and VAC had signed an agreement for CGSB to develop a National Standard of Canada for service dogs. It is not clear why VAC and CGSB chose to ignore the relevant developments in the United States.

In October 2015, CGSB held the first meeting of its newly-formed Committee on Service Dogs to develop the standard. During this first meeting, the scope of the project was changed from a focus on PTSD dogs to include all guide dogs and service dogs in Canada. No effort was made to retain the existing scope, nor was an effort made to advise additional stakeholders of the change, or to reconstitute the committee to reflect the new interests that had been incorporated.

From May to June 2017, CGSB's Public Enquiry stage for the draft service dog team standard was opened. However, there was no broad public announcement, so those additional Canadians who had been incorporated into the scope remained largely unaware of the draft standard. It was only when two American guide dog schools alerted their Canadian graduates that alarms were raised.

To make matters worse, appeals needed to be made through the Canadian Human Rights Commission and Members of Parliament to force CGSB to make their documents and processes accessible to blind Canadians who were being impacted.

Concerns Expressed by Advocates:

CGSB and its Committee on Service Dogs started with a mandate to address issues related to PTSD dogs, but quickly changed the scope to incorporate all guide dogs and service dogs in Canada.

They ignored existing international accreditation and standard-setting bodies. On the PTSD front, they ignored significant developments and progress regarding PTSD dogs in the United States, resulting in PTSD dog standards in Canada being delayed years longer than they needed to be, more veterans suffering longer, and more unaccredited trainers victimizing veterans and funders.

CGSB and its Committee on Service Dogs did not merely intend to develop a voluntary standard, as they have stated to the public; they intended to develop public policy that would become mandatory. In this effort, CGSB failed to apply good public policy principles, failed to use good public policy processes, and did not develop any implementation plan.

CGSB and its committee ignored existing provincial laws and federal government initiatives; they strayed from statements made before a committee of Parliament, and ignored broad policy direction from the Prime Minister.

Their policy has been positioned in a way that would violate the human rights of vulnerable Canadians.

CGSB has no legal jurisdiction to make public policy related to human services, and they proceeded to develop the draft standard without the participation of those who hold responsibility – the provinces.

The process that CGSB and its committee followed lacked transparency and accountability, and the committee itself was constituted in a way that severely under-represents impacted people, and over-represents organizations and individuals who have conflicts of interest.

To make matters worse, each committee member and all participants are required to sign a nondisclosure agreement that places the proceedings in a state of secrecy. Even now, advocates are reticent to meet with the committee because their subsequent advocacy efforts would be hampered by the secrecy oath they are required to sign.

Recommendations:

Stop the Current Process

Stakeholders have lost trust in both the process and the participants; no amount of fixing will win that trust back. So, the most effective first step to get back on the right track is for the Minister of Public Services and Procurement and the Minister of Veterans Affairs to withdraw the draft standard and abandon the current process.

Introduce Accountability and Acquire Policy Development Expertise

Stakeholders have lost faith in both the process and the participants; it is not possible for CGSB to continue to lead. It is also difficult to provide a recommendation to the Government of Canada when they do not have jurisdiction for this policy area. If policy work continues at the federal level, it must be led by the Minister for Sport and Persons with Disabilities. Whatever processes unfold in the future at any level of

government regarding guide dog and service dog issues, it is recommended that clear accountability for policy development and implementation be established at the beginning of the process and communicated publicly. Further, the policy development must be undertaken by those with appropriate expertise.

Introduce Transparency and Open Up the Process

Because of a lack of communication, many affected stakeholders are still unaware that this draft standard was developed and would have affected their lives. Again, it is difficult to provide a recommendation to the Government of Canada when they do not have jurisdiction for this policy area. Whatever processes unfold in the future at any level of government regarding guide dog and service dog issues, it is recommended that users are placed in a strong position to influence policy outcomes, those who might experience cross-impacts or unintended consequences are engaged, and existing accreditation organizations are represented (ADI, IGDF) so that existing accreditation and standards are used. Parties must ensure there is open communication to all those in the public that are interested at every step of the process.

Create a Three-Pronged approach to Reflect the Three Policy Problems

Recognizing there are three distinct policy problems at play, there will be different needs and different participants for developing a solution to the problems associated with 1) addressing the growing demand in the new field of PTSD dogs, 2) ensuring access rights are addressed, and 3) dealing with the variety of legal approaches across Canadian jurisdictions. It is recommended that no jurisdiction attempt to address all three issues together in one process.

In Addressing Growing Demand, Seek to Regulate Industry, Not Individuals

CGSB's draft service dog team standard would have required assessments of every dog user in the country; this runs counter to the precepts of human rights. It is recommended that any regulatory approach focuses on regulating the dog training industry through existing, established accreditation bodies. For those who find that training their own dog is best for them, and thus there is no third-party accreditation to ensure quality, there needs to be an appropriate assessment that gives legitimacy for these dog / handler teams.

In Addressing Public Access Concerns, Build on Success

It is recommended that there be two areas of focus to enhance public access rights. First, all governments, dog users, trainers, schools, advocates, and allies have a shared responsibility within their own spheres of influence to educate the public. Second, there are jurisdictions in Canada that already have successful legislation, and policy developers must build on those approaches, rather than inventing new ones.

In Addressing Differences Across the Country, Strong Advocacy Will Win the Day

It is recommended that the Government of Canada encourage and facilitate individual Canadians, advocacy organizations, and provincial governments to work together to harmonize provincial requirements for guide dogs and service dogs to ensure legal protections are in place in every province, that those protections are consistent, and that each province recognizes dog / handler teams from other provinces without creating hurdles that become barriers to travel.

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Chapter 1: Introduction

Background

The Canadian General Standards Board (CGSB) is an arm of the Government of Canada – part of Public Services and Procurement Canada. In their own words, they “offer client-centred, comprehensive standards development and conformity assessment services in support of the economic, regulatory, procurement, health, safety and environmental interests of our stakeholders — government, industry and consumers”. Having a national standard-setting organization is a good idea.

Recently, CGSB released a draft standard for service dog teams in Canada so public comment could occur. There was a significant outpouring of negative commentary, especially from blind people who use guide dogs and their supporters. It was estimated that some 1,000 pages of commentary were received related to this sixty-page draft standard. Letters, phone calls, and meetings continue with elected officials; human rights organizations have been engaged, news outlets have had coverage, international standard-setting bodies have been contacted, and social media commentary is occurring. Every indication suggests that strong advocacy efforts against this draft standard will continue.

How could things have gone so wrong?

It is dismayed that this draft standard was developed by a Government of Canada agency, and landed in peoples’ laps with little, if any, notice. The draft standard itself seems ill-conceived and likely would violate the human rights of disabled Canadians.

There are many people who are advocating against this draft standard based on the content of the document. However, this report leaves the content of the draft standard to others, and reviews the process that was followed in the belief that good process leads to good results, and bad results must mean there was a process problem.

Approach

Research for this report has been based mostly on publicly-available information. Discussions occurred with some individuals who are advocating against the content of the draft standard, one conversation occurred with a representative from CGSB, and two Access to Information requests were filed.

Responses to the Access to Information requests have not yet been received; however, there are important time constraints related to the continuing CGSB process. Rather than wait for responses that might not arrive in time, there is enough information already gathered to warrant publishing findings and comments so they can be considered by decision-makers in a timely way. Further insights will be shared as more information becomes available, and as the CGSB process continues.



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Objectives

This report was prepared with three objectives in mind:

- To provide an understanding of the process undertaken by CGSB so advocates can see where, when, how, and why things went wrong;
- To contribute to the broader public discussion regarding standard-setting in the world of guide dogs and service dogs; and
- To show decision-makers that this standard-setting exercise needs to be stopped, and to provide some thoughts on how a better process might proceed.

Chapter 2: Myopia and Disenfranchisement – Background to What Happened

Chapter 2 Introduction

We will start by looking at the sequence of events. The details have been summarized and consolidated as much as possible to keep the size of this chapter manageable, while still covering key activities.

For those who are less familiar with the world of service dogs, we will start to introduce some definitions and some organizations. This will be helpful in later chapters.

In this chapter, you will see how the Canadian process ignored important developments in the United States that could have moved the ball forward much faster for veterans suffering from Post Traumatic Stress Disorder (PTSD). Also, we will discuss the sudden and unexpected change in the scope of work being done by CGSB that gave rise to so much trouble for guide dog users and others.

Definitions and Three Organizations to Meet

It is generally accepted that “guide dogs” are for the blind and vision impaired, and “service dogs are for people with disabilities other than those related to vision.

The International Guide Dog Federation (IGDF) is based in the UK and was formed in 1989. It is comprised of 92 organizations in 30 countries (5 Canadian organizations), whose purpose is to serve people who are blind or vision impaired by training and providing guide dogs. IGDF facilitates a sharing of knowledge, experience, high-quality standards, methodologies and help for new or existing schools wanting to improve the quality of their operations. All of this is focused on improving the safe independent mobility of blind and vision impaired people throughout the world. IGDF provides an accreditation and assessment process which ensures that operational standards are maintained and improved in relation to the world benchmark high quality standard.

Assistance Dogs International (ADI) is based in the United States and was formed beginning in 1985 when a group of hearing dog organizations began gathering to develop common standards and guidelines. Today ADI has 129 organizations in 21 countries (8 Canadian organizations), which not only provide hearing dogs, but also service dogs for people who use power or manual wheelchairs, have balance issues, have various types of autism, need seizure alert or response, need to be alerted to other medical issues like low blood sugar, or have psychiatric disabilities. ADI establishes standards for the service dog industry ensuring that dogs are treated humanely, clients are treated with respect and dignity, and training is

delivered in a professional way. Members of ADI have developed an accreditation manual and accreditation procedures to evaluate the quality standards of service dog programs.

The Canadian Foundation for Animal-Assisted Support Services (CFAS) is a fund-raising, public awareness, and lobbying organization whose mission is to improve the health and quality of life of people with physical, emotional, and social challenges through partnerships with companion and service animals. The organization has a background related to animal-assisted therapy and promoting the emotional aspects of the human-animal bond. They do not produce guide dogs or service dogs, and are not accredited by either IGDF or ADI.

The American Experience – A Chronology

In 2005, ADI-accredited schools in the United States began placing service dogs with veterans returning from Iraq and Afghanistan to mitigate their physical disabilities (of the 900,000 American soldiers injured in these conflicts, it is estimated that up to 50,000 may have been able to benefit from a service dog). Many wounded veterans began using the tasks trained to mitigate physical disabilities to help them cope with PTSD.

By 2008, ADI had started to design a program to meet the needs of veterans with PTSD – the Trauma Assistance Dog (TAD) Program. With the success of TAD, in 2010 ADI decided to develop standards for service dogs assisting with PTSD, and a committee was created to develop best practices. This committee’s work was presented at two ADI International Conferences (Barcelona in 2012, and Denver in 2014), and later became the basis for the ADI Provisional Guidelines for the placement of PTSD Service Dogs webinar that is now available for member organizations.

By 2015, ADI had commissioned a committee to take best practices and the provisional guidelines and develop a framework on which standards could be based. By mid-2016, the ADI standards and ethics committee was given the task of developing the framework into definitive standards. Once the standards are ratified by the ADI membership, any service dog organizations seeking accreditation for programs to place dogs with handlers who have military-related PTSD will have to meet these standards.

The Canadian Experience – Ignoring the Americans

Over an extended time, CFAS received concerns related to PTSD service dogs, especially regarding the cost of service dogs and the need for assistance to access public spaces. They decided this problem arose because there were no consensus-based standards for best practices or third-party credentialing processes for service dog trainers. This conclusion seems unusual, given the evidence that work was developing well in the United States.

In 2013, responding to issues raised by veterans and lobbying by CFAS and others, Veterans Affairs Canada (VAC) commissioned a report on the use of service dogs to assist individuals with PTSD. The research team at McMaster University found the current international research to be inconclusive and, although there is anecdotal evidence of benefits, further research was required. It is not clear why ongoing work in the United States was not considered valid.



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In the second half of 2013, CFAS hosted two “Military Assistance Dog Summits” to raise awareness of the PTSD dog issue. They had taken the step of formally asking CGSB to develop a national standard for Canada, and CGSB presented at both summits.

Throughout 2014, stakeholder meetings were held involving VAC, the Department of National Defence, CFAS, and Wounded Warriors – a veterans’ support group. CGSB decided to move ahead with standard development, and in October 2014, convened a meeting to discuss the initial scope of a standard and potential project funding. Again, it is baffling why no organization made use of the work occurring in the United States – by this time, ADI best practices had been developed.

In March 2015, CBC News reported that funding provided for PTSD dogs for veterans by many branches of the Royal Canadian Legion had been put on hold due to concerns about poorly trained dogs. This highlights the issue that, given the lack of progress in Canada, many small, unaccredited organizations or uncertified individual trainers had entered the Canadian market – fraud was beginning to occur, further victimizing PTSD sufferers along with funders.

In the Spring of 2015, CGSB signed an agreement with VAC for the Development of a National Standard of Canada for service dogs, and that Fall, VAC launched a concurrent pilot study of service dogs to support those with PTSD. (The research team from Laval University expects that a phase 1 report will be complete by November 2017, followed by a final report in July 2018, but it has not been disclosed whether they will reference American experience in this area.)

In October 2015, CGSB held the first meeting of its newly-formed Committee on Service Dogs to develop a “service dog standard”. During this first meeting, the scope of the project was changed by the Committee from a focus on just PTSD dogs to include all guide dogs and service dogs in Canada.

The CGSB Committee on Service Dogs continued to meet through April 2017 when a “public enquiry” stage was initiated. From May to June 2017, CGSB’s Public Enquiry stage for the draft service dog team standard was opened. However, there was no broad public announcement or press release from CGSB, so blind Canadians were largely “in the dark”. A few messages were circulated on several small email lists inviting feedback, but the format of the CGSB document and CGSB’s comment form were inaccessible to the blind, so it gained little attention or traction in the blind community.

On June 27, 2017, two American guide dog schools alerted their Canadian graduates to the draft standard, which raised awareness and alarms. At the same time, several people were working through the Canadian Human Rights Commission, their Members of Parliament, and other people in their networks to get the CGSB website made more accessible and to accept general comments in letter form. These appeals to the CGSB gained a two-week extension for comments, to July 14, 2017.

Until late June, when guide dog users received letters of concern from their respective American guide dog schools and pressure from advocates through human rights and political avenues had an impact, most guide dog users in Canada did not know that a draft standard was being developed. So, most blind



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Canadians only had from June 27 to July 14 to understand that a draft standard had been developed which would affect their daily lives, review and discuss the draft, formulate responses, and submit their comments – a process where others had been involved for years.

Why Did We Not Piggy-Back on Existing American Progress?

Veterans in Canada and the United States were experiencing PTSD at the same times, and many were finding that having a service dog was an effective approach to help deal with their PTSD-related issues. Although this was not in a controlled academic environment, real experience, and especially the size and complexity of the American experience, indicated that PTSD dogs were worth pursuing.

No good answer has been given for why Canadian organizations did not avail themselves of the American experience, especially given that ADI has 8 accredited organizations in Canada. ADI is represented on CGSB's Committee on Service Dogs, but their voice was drowned out. One must ask, what were the motives of other committee members to ignore a solution that was readily at hand?

Then, when the CGSB Committee on Service Dogs expanded their scope to include guide dogs, why was no credence given to existing IGDF standards and accreditation processes? CGSB has suggested that ADI and IGDF standards are not "consensus based". However, given these organizations' histories, scope, positive global reputation, and documented process of researching and developing standards, CGSB's position is hard to swallow. It also seems disingenuous, given the poor quality of CGSB's public enquiry phase on this draft standard.



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Scope Change

In May 2014, Mr. Pablo Sobrino (Associate Assistant Deputy Minister, Acquisitions Branch, Department of Public Works and Government Services) spoke before the Standing Committee on Government Operations and Estimates and said, "CGSB was also recently approached to develop a standard for psychiatric service dogs. These dogs may be used to assist people with post-traumatic stress disorder, for instance." Senior leadership and Parliament had a clear picture of the scope of work that was to be undertaken by CGSB.

However, at its first meeting, the CGSB Committee on Service Dogs expanded its own scope from just PTSD dogs to include all guide dogs and service dogs. The Committee was constituted to address an area where standards were newly being developed in the United States (and did not yet exist in Canada), where small unaccredited training organizations were creating problems, where the rights of dog handlers were unclear and untested, but where some very specific work by ADI could have been brought to the table to realize quick wins for all concerned. Instead, the Committee moved into areas where there are decades of global experience, reputable accrediting bodies, excellent training schools, a solid human rights environment, and mature funding streams. And within this newly expanded scope, the committee seemed intent on ignoring the existing standards, and infringing upon or diminishing the existing rights of dog handlers.

It is important to emphasize the significance of this change in scope. There was no apparent effort by CGSB to pull the group back or re-frame the discussion. Simply put, with this change in definition, the entire project changed, along with the nature of the stakeholder groups that would be affected. An Access

to Information request has been submitted to determine whether this increased scope was vetted and approved at higher management levels, and if the Minister was made aware (given that Parliament had been informed of the smaller scope).

With this scope change now affecting many more stakeholders, schools and accreditation bodies began lining up against the draft standard, including ADI and IGDF. Guide dog and service dog users across the country are fearful that their hard-won rights are being withdrawn, and that the draft standard has such onerous and intrusive requirements that they may not be able to acquire a dog in the future. Indeed, some American schools have indicated that they may no longer accept Canadians into their programs if the draft standard is put in place in Canada.

Chapter 2 Conclusion

To the average Canadian, ignoring developments in the United States regarding PTSD dogs seems myopic, and the result of this myopia is that PTSD dog standards in Canada will be delayed years longer than they needed to be, more veterans will suffer longer, and unaccredited trainers will continue to take advantage of veterans and funders.

Between the sudden and unexpected increase in scope, the lack of a meaningful public consultation process, and the unnecessary intrusion into a well-established, accreditation-driven environment, disabled Canadians are feeling they have been disenfranchised by a committee that seems to be accountable only to itself.

Chapter 3: Using the Wrong Approach – Standards versus Public Policy

Chapter 3 Introduction

Guide dog users have been told not to worry because CGSB standards are voluntary. But, disabled people around the world know that voluntary standards can be used to diminish their rights, and it is only a matter of time before they become mandatory. We will explore this idea of voluntary standards versus mandatory public policy.

CGSB operates in a way that is based on the work they were set up to do. In this chapter, we will examine that context and why it does not lend itself to successful public policy formulation.

Organizations that prepare standards and those that undertake public policy development both operate within a set of principles; however, they are each very different. We will compare CGSB principles to good public policy principles to learn more about why the draft standard misses the mark.

Finally, we will look at the idea that CGSB does not have the legal authority to make a standard for service dogs.

Standard, or Public Policy? A Question of Intent

CGSB's draft service dog team standard says, "this Standard does not preclude or override any applicable regulatory or legal requirements". Therefore, CGSB officials emphasize that the draft standard would be voluntary and does not constitute policy. However, the draft standard goes on to say that, "it may be referenced as a benchmark to support commonality of regulations / legislation for service dog teams across Canada"; and, the draft standard also says that, "this Standard is intended for use primarily by regulators", among others.

During meetings of CGSB’s Committee on Service Dogs, many references were made about pushing regulators to embed this standard in regulation, and about how much easier it is to have a standard developed than a regulation. The Committee even changed their scope to include the idea that the standard would “facilitate regulations”. The airline industry’s representative talked about different airlines being able to use the standard across Canada; this statement was made without the least worry that such an action would make the standard “policy by default”, place disabled travelers in a state of confusion, and put additional pressure on provinces to adopt the standard into their regulations.

Clearly, it is the intent of CGSB and its Committee to have the standard applied across Canada, and to encourage provinces to adopt it into provincial regulation. Some of the Committee members seem to be using the standard-setting process to achieve their own agendas by doing an “end run” around the provincial regulatory process.

It is noteworthy that there is only one provincial regulator who is a voting member of the Committee on Service Dogs, and that province failed to participate in any of the Committee meetings for which minutes have been made public (NB, minutes for one or two subsequent meetings are awaiting Committee



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approval before being released, so whether any provincial representatives attended those meetings is unknown). Are the provinces aware that this activity is going on, the implications for their programs and services, and the impact on the rights of people with disabilities?

In the context of making a standard that affects the daily lives of vulnerable individuals – those whose rights have historically been trampled, and who have had to fight long battles to be recognized as full citizens – any indication that a “voluntary” process is being developed by the government will create significant concern. Then, when it becomes clear that the committee developing the standard wants and intends it to become mandatory, it will quickly be understood by disabled Canadians that the “standard” is in fact government policy and is “voluntary” in name only.

Standards versus Public Policy – the Context of Different Approaches

We now understand that this draft standard is a public policy proposal, but it was developed by a group whose role is to develop voluntary standards. So, what’s the difference?

The context for a standard development exercise compared to one designed to develop public policy is significantly different, but because CGSB does not have policy expertise, their process falls short across every aspect of public policy development.

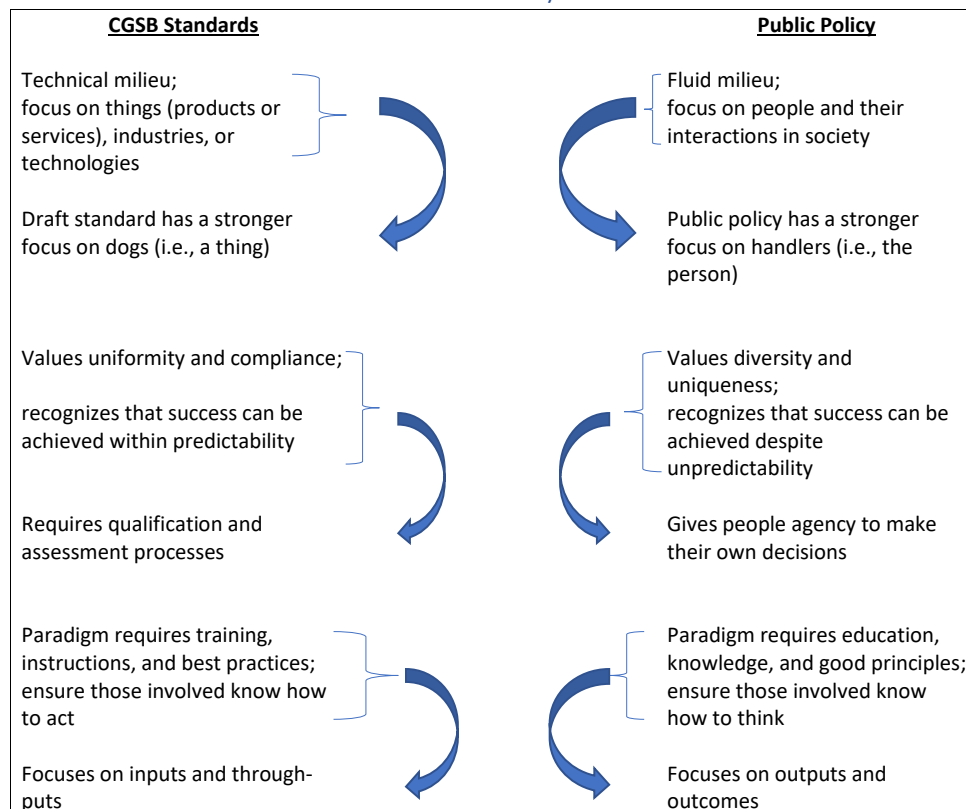
The CGSB standards milieu is technical; the focus is on things (products or services), industries, or technologies. On the other hand, the public policy milieu is fluid, the focus is on people and their interactions in society. As a result, the draft standard has a stronger focus on dogs (i.e., a thing), rather than handlers (i.e., the person).

The CGSB standards approach values uniformity and compliance and recognizes that success can be achieved within predictability. On the other hand, the public policy approach values diversity and

uniqueness and recognizes that success can be achieved despite unpredictability. As a result, the draft standard requires onerous qualification and assessment processes that infringe on peoples’ rights rather than giving people agency to make their own decisions in consultation with accredited training schools.

The CGSB standards paradigm requires training, instructions, and best practices to ensure those involved know exactly how to act to achieve success. On the other hand, the public policy paradigm requires education, knowledge, and good principles to ensure those involved know how to think to achieve success. As a result, the draft standard focuses on inputs and through-puts rather than outputs and outcomes.

Figure 1: The Standards Context Versus the Policy Context



The CGSB policies and procedures focus on the economy, trade and commerce, and technical product and process specifications, not human services. This is reinforced when many references in CGSB material are made to “consumers” (i.e., an economic unit) rather than people or citizens. An obvious illustration of this contextual problem is that the newly created CGSB Committee on Service Dogs was given an example of an existing standard as part of their orientation – the closest existing standard that CGSB could find to illustrate the task ahead relates to organic agriculture!

The CGSB standards approach does not reside in a public policy development context; thus, it is inadequate to address the needs of service dog and guide dog users across the country. Because of these shortcomings, the draft standard will not suit any modern regulatory agency as a jumping-off point for regulations.

Comparison of Principles

To further emphasize the difference between voluntary standards development and public policy development, we need to look at the principles that guide and inform each of these different activities. By comparing the different principles, we will gain a deeper understanding about why CGSB's scope change in October 2015 is so important.

CGSB Principles

The first stated policy within the CGSB Policy and Procedures Manual says that CGSB bases its standards development process on "ISO Guide 69". However, the International Organization for Standards (ISO) has withdrawn this standard. It is no longer available for the public to purchase, so it is not clear how, or whether, ISO's withdrawal of Guide 69 affects the principles that guide CGSB.

There are many principles listed in CGSB's Policy and Procedures Manual. It is a bit lengthy, but a summary of them is reproduced here for readers' reference. Some are good statements of principle, but many are process-oriented and tend to be inward-looking:

- Canadian principles, including:
 - consensus
 - equal access and effective participation by concerned interests
 - respect for diverse interests and identification of those who should be afforded access to provide the needed balance of interests
 - mechanism for dispute resolution
 - openness and transparency
 - open access by interested parties to the procedures guiding the standards development process
 - clarity with respect to the processes
- Canadian interests, including:
 - Canadian economy
 - Sustainable development
 - Health, safety and welfare of workers and the public
 - Assist consumers by facilitating choice, promoting consistent design quality, and providing consumers with safer, healthier and more environmentally sound products and services
- Standards should be based on the consolidated results of science, technology and experience, and aimed at the promotion of optimum community benefit
- Avoiding duplication
- Timeliness in the consideration for the development of new or revised standards
- Sufficient and competent staff
- Documentation retention
- Standards harmonization with international community
- Give due consideration to the adoption of relevant regional standards, International Standards, and other regional/international deliverables
- International and regional co-operation
- Ensure that standards are not developed to create unnecessary obstacles to international and/or inter-provincial trade

- Standards should be developed to meet the needs of the marketplace and should contribute to advancing trade in the broadest possible geographical and economic contexts
- Ensure that standards are not developed to fix prices, exclude competition or otherwise inhibit commerce beyond what is necessary to meet requirements of relevant technical regulations or other legitimate sectoral or local requirements for compatibility, environmental protection, health and safety
- Ensure that standards are not developed to discriminate among products based on the place of origin
- Safeguard that the source of the materials for the product of a standard is not prescriptive as to specify one location where they may be obtained
- Resolve identified instances of unjustified discrimination, and remove the potential for future instances
- Intellectual property
 - Do not specify the use of trademarked, patented, or patent pending material, products, processes or apparatus, or any constituent thereof, unless there is only one suitable material, product, process or apparatus, or constituent thereof available or a technical justification exists

Public Policy Principles

Principles of good public policy are summarized below (source: *Developing Public Policy: A Practical Guide* by Bobby Siu; Canadian Scholars Press, ©2014). These are higher-level principle statements than those used by CGSB, and they are all outward-looking ideas:

- Balance of public interests – are the interests of the diverse and varied stakeholders reflected and well-balanced in the policy
- Accountability – is an accountability framework well articulated
- Impact – are the objectives and expected impacts of the public policy explicitly stated
- Cost effectiveness – is the policy the most cost-effective way to solve the policy problem(s)
- Justice – is the policy just to everyone affected by its implementation, and does it reflect the hallmarks of social justice:
 - Each person is entitled to the most extensive set of basic liberties compatible with the same liberty for all (liberty principle)
 - All positions of public responsibility or private advantage should be open to all based on fair equality of opportunity (fair opportunity principle)
 - Any inequality in the distribution of resources for a good life is permissible only insofar as it is to the advantage of the worst-off group in society (difference principle)
- Balance of short- and long-term considerations – is the policy both present- and future-oriented

Commentary on Principles – Impact

Some of the CGSB principles fit with good public policy principles, but there are key areas where the two sets of principles diverge. We will specifically discuss "accountability" in a later chapter; so, setting that aside, we will begin by considering "impact".


The idea of "impact" is that every public policy tries to solve a problem. A public problem leads to negative impacts, and through the development and implementation of a new policy, the negative impacts ought

to be eliminated or at least mitigated. This means that every policy needs to have formal explicit, clear, and consistent objectives. The draft service dog team standard does not.

This requirement to consider impacts is not evident in the CGSB principles; rather, their principles are geared to guide the standards development activity itself, rather than consider any public impacts other than the need to enhance trade. Why would their principles not consider the impact question? The only logical answer is that CGSB assumes the impacts have been analyzed by others. Somebody else does the policy analysis and decides that a standard is the solution to a public problem, then CGSB just develops a standard the best way they know how – some other organization is responsible for implementation and the impacts of the policy.

To put this into focus with the service dog team draft standard, you will remember from Chapter 2 how CFAS, VAC, and others were engaged in years of meetings looking at problems related to PTSD dogs. CGSB participated in many of those meetings. If we consider for a moment that those meetings were a type of

public policy development process, this puts CGSB's draft standard in a new light. All the meetings during 2013 – 2015 should have defined a problem, looked at impacts, and discussed what options might be suitable to mitigate those impacts. As a result of those meetings, VAC concluded that a national standard for PTSD dogs was the solution.



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Regardless of the flaws in the VAC / CFAS process, it would be logical that CGSB would not see itself as “owning” the impact responsibility; rather, they are just responsible to develop a national standard according to their normal way of doing business to meet the expectations of VAC and CFAS (the originators and owners of the process that drove the “policy decision”).

However, where CGSB becomes culpable is when they allowed the Committee on Service Dogs to dramatically increase its scope. Now, none of the policy analysis that might have been done by VAC has any relevance to the work that was being conducted by CGSB; yet, the process continued. CGSB effectively took responsibility for a public policy development process of massive scope without doing any of the ground work necessary for it to be successful.

Commentary on Principles – Justice

The idea of “justice”, and especially “social justice”, is absent from CGSB principles. In the normal course of their business, CGSB relies on the concept of “consensus”, and would have no need to consider whether the rights of some people (even the majority) may need to be knowingly and intentionally compromised to protect the rights of others. Yet, this is a reality of developing public policy in the disability arena.

CGSB does not have the skills or abilities to tackle issues raised by social justice concerns, nor did it create a Committee on Service Dogs with these skills. What is more, it is not legally positioned to address these questions. By attempting to draft a standard that impacts the daily lives of disabled Canadians, they have naturally bumped into (and glossed over) areas where social justice considerations needed to be addressed, and weren't.

Jurisdiction – Canada Versus the Provinces

Under Canada’s constitution, provinces are responsible for, among other things, health, education, social services, property and civil rights. The draft standard is firmly embedded within this scope. It deals with the definition of disability, who may access service dogs and guide dogs as a result of a disability, what personal and private information must be provided and to whom in order to qualify to obtain and use a dog, how the dog may be used, what places and facilities must allow access, what objections may be valid for disallowing a dog / handler team access, the terms and conditions related to the care and training of dogs, and the processes related to ensuring the well-being of the dog / handler team. This entire draft standard sits within provincial jurisdiction.

Given the clear intention to force these standards across the country, it would seem the provinces should have been well-represented on CGSB’s Committee on Service Dogs, but they were not.

The areas covered by this draft standard fall within the jurisdiction of provincial governments. The Government of Canada does not have jurisdiction to make either standards or public policy in these areas.

Chapter 3 Conclusion

We have seen that CGSB and its Committee on Service Dogs intended to develop public policy related to service dogs and guide dogs, but they are not qualified to do so. Whatever public policy development process CGSB might be relying on (e.g., VAC), fails to reflect good public policy principles in relation to the expanded scope of the project. Furthermore, the Government of Canada does not have jurisdiction to develop standards or policies in this area without the full participation and agreement of the provinces.



“THE AREAS COVERED BY THIS DRAFT STANDARD FALL WITHIN THE JURISDICTION OF PROVINCIAL GOVERNMENTS.”

Chapter 4: Non-Compliance – A Look at Processes

Chapter 4 Introduction

In Chapter 3 we looked at higher-level principles and learned that there are important differences between standard development and public policy development. In Chapter 4 we are going to continue the comparison, but this time we will drill down a level and look at processes – the steps that an organization goes through to produce either a standard or a public policy. How do the steps match up or differ?

We will then begin to compare what CGSB did, to what its own policy and procedure manual requires.

A word of clarification about some terminology. In Chapter 2 we discussed how CGSB formed the Committee on Service Dogs in October 2015 to draft the service dog team standard. As we begin looking at details from CGSB’s procedures, you will see references made to the “Technical Committee” or “TC”; the Committee on Service Dogs is the Technical Committee for this standard – they are the same group. When CGSB’s policies are being quoted, you will see the TC terminology used because their policy needs to be generic. But we will continue to use the committee’s actual name (the Committee on Service Dogs) when we are talking specifically about the service dog team standard and related processes.

Comparison of Process – CGSB versus Public Policy

CGSB Process

The steps in CGSB's standard development process are summarized as follows:

- Preliminary Stage – CGSB evaluates the New Work Item Proposal (NWIP) to develop or maintain standards
- Proposal Stage – in discussions with the requester, CGSB further evaluates and finalizes the NWIP and prepares a project proposal, including a work plan and a draft scope, and identifies required funding
- Drafting Stage – the public is advised of the existence of the work item and the first drafts are prepared
- Committee Development Stage – the draft is further developed and reviewed by the Technical Committee (TC) (*remember: in our case, the "TC" is CGSB's Committee on Service Dogs*)
- Public Enquiry Stage – the draft is made available for public comment while the TC continues to review the draft
- Committee Approval Stage – the draft is approved by ballot by the TC
- Ratification Stage – the approved draft and the documented steps leading to its approval are submitted to the Panel on Process Assurance (PPA) for second-level review; proposed CGSB standards are ratified at this stage, whereas National Standards of Canada and National Adoptions of Canada are submitted to the Standards Council of Canada (SCC) for ratification (*in our case, the service dog team standard would go to the SCC because it is proposed to be national in scope*)
- Publication Stage – the standard is published, a notice of completion and publication is published, and distribution is initiated
- Review Stage – a notice of intent is published; standards are reviewed in accordance with applicable schedules or needs and a decision is made to amend, revise, reaffirm, or withdraw
- Withdrawal Stage – a notice of intent is published, a public review and a ballot or a survey of the stakeholders is held, a second-level review is submitted to the PPA for approval, and a notice of withdrawal is published

Public Policy Process

The steps in the public policy development process are summarized as follows (source: *A Guide to Policy Development* (Office of the Auditor General of Manitoba, January 2003):

Issue Identification – how one understands and defines a problem affects the policy solutions put forward to address the issue, so it is critical to properly diagnose the problem and distinguish the symptoms or effects of a problem from the actual problem itself.

Issue Analysis – often a problem involves many concerns and is multi-dimensional; identify the key dimensions of a problem, analyze the problem from different perspectives, understand the environment in which the problem is occurring, understand stakeholder / client perspectives, and conduct comparative data analysis.

Generating Solutions:

- Develop a conceptual framework to drive the selection of policy options to be assessed, which includes the main working parameters (i.e., the “givens” or the limitations within which you are working), the key principles / values, and government / ministerial goals and priorities;
- Identify desirable short-, medium-, and long-term outcomes to frame the assessment of potential policy options and to aid in the performance monitoring step; thus, each option is assessed in relation to its potential to meet expected outcomes;
- Be careful to distinguish policy options from implementation options; and
- Develop criteria for evaluating the pros and cons of each option, and evaluate each option against the same criteria.

Consultation – consultation must be tailored to meet the time frames, resource availability, and nature of the policy issue at hand; decide who, what, when, where, why, and how.

Performance Monitoring – the root causes of a policy (see previous steps) provide the seeds of potential indicators by which to measure progress in achieving the policy objective; or, look to the programs and initiatives through which policy is implemented for measurement criteria.

Commentary on Process – Linear versus Interactive

The process followed by CGSB to develop standards is linear, with one step following another; there is provision for moving back to a previous stage, but that is designed to handle exceptions, rather than being an integral part of the process. In the case of the public policy development process, the steps are not discreet and the process is designed to be iterative; the steps are inter-related and inter-dependent with movement back and forth between the steps being expected.

Particularly in the human services field, with widely divergent interests at play, the use of a linear process is likely to place stress on the participants as new information comes forward in later stages. It will also put stress on stakeholders and the public as their opportunities to have input are limited – in fact only at one place in the process, and then only after much work has already been done behind closed doors. These stresses are certainly evident from the volume and nature of negative feedback received by CGSB on the draft service dog team standard.

Commentary on Process – No Implementation Plan

CGSB’s process does not contemplate “implementation”, but simply “publication”. The public policy process contains an implementation bias at every stage, especially regarding performance monitoring. Without a sound implementation process that has been developed and vetted at each stage, most policies would fail, as will the service dog team standard, if it moves ahead as it is.

In Chapter 3, we looked at how CGSB seems to be relying on the work done by VAC, CFAS, and others during 2013 – 2015. This work is viewed as a policy development process, and the policy decision was taken to develop a standard. CGSB is then simply in the position to do their standard development work



“WHEN CGSB CHANGED THE SCOPE OF THE PROJECT AND NEGATED ANY PREVIOUS CONSULTATIONS, THEY CREATED AN IMPLEMENTATION VACUUM – WHO IS GOING TO IMPLEMENT THIS STANDARD, AND HOW?”

without worrying about implementation. The assumption must be that implementation will be done by others. This is the only way that the lack of “implementation” in CGSB’s draft standard would make any sense.

However, when CGSB changed the scope of the project and negated any previous consultations, they created an implementation vacuum – who is going to implement this standard, and how? Access to Information requests have been filed to acquire more documents, but pending that, there is no public evidence that this implementation question has been realistically addressed by CGSB or any other organization in government – federal or provincial.

Commentary on Process – No Meaningful Consultation or Environmental Scan

Given the broad scope of this project, there should be ample evidence of people having been consulted openly and frequently. In short, any consultation that occurred, happened in relation to PTSD dogs. There is no evidence of a public policy development process undertaken by any organization in the federal government related to the broad scope of the draft standard. No issue identification, no issue analysis, no development of alternative solutions, no consultation, and certainly no performance monitoring plan. This is because the CGSB process does not accommodate a broad look at the environment in which it’s standards are being developed and ultimately implemented. If this work happened, it happened behind closed doors.



“PUTTING CGSB’S
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Commentary on Process – Ignoring Government Directions

If CGSB had considered even the immediate Government of Canada environment, they would have considered not only VAC’s efforts related to PTSD dogs, but also the Minister of Sport and Persons with Disabilities, who is undertaking a high-profile public consultation regarding accessibility across the country. How does this standard relate to the Minister’s consultations?

The Prime Minister made a statement in December about accessibility for people with disabilities that constituted broad policy direction to his staff. He said, “we celebrate the contributions made by persons with disabilities to our country, and recommit ourselves to building a Canada that is truly inclusive and equal. Around the world, far too many persons with disabilities still face major barriers – stigma, discrimination, limited accessibility, even denial of basic human rights – to fully participate in society. Here at home we are trying to do our part to address this challenge.” The draft service dog team standard does not further that agenda. Rather, it treats persons with disabilities as inferior, unable to make their own reasoned decisions, and even unable to care for their own dogs to the same degree as anyone else in our communities.

And what about the provinces, who are legally responsible for this area of policy? For example, Ontario has tabled legislation – the Ontario Service Dogs Act – that has passed first reading; was this accounted for when the draft standard was written? Other provinces have existing legislation; was this accounted for?

All of this leads me to conclude that the CGSB standards development process is inadequate to address the public policy needs related to guide dogs and service dogs. Putting CGSB's linear process ahead of a sound public policy development process has resulted in faulty policy being placed before a vulnerable stakeholder group for their time-limited input.

CGSB Policy and Procedure – Non-Compliance

To fully compare CGSB's process requirements with what happened, more information is required; Access to Information requests have been made. However, there is sufficient information available to illustrate that at least some of CGSB's own requirements were not followed in some substantial areas. To do this analysis, in each instance we will quote the relevant CGSB policy followed by a commentary.

CGSB policy 6.1.7 Canadian Regulations

"All standards shall comply with existing federal statutes and regulations. Consideration should be given to ensuring standards comply with relevant provincial regulations if there are no applicable federal statutes and regulations."

There is provincial legislation already in place governing guide dogs and service dogs; for example:

- BC Reg. 223/2015 – Guide Dog and Service Dog Regulation under the Guide Dog and Service Dog Act
- AB Reg. 108/1979 – Guide Dogs Qualifications Regulation under the Blind Persons' Rights Act
- AB Reg. 59/2017 – Service Dogs Qualifications Regulations under the Service Dogs Act
- ON RRO 1990 Reg. 58 – Guide Dogs under the Blind Persons' Rights Act

There is provincial legislation currently under consideration in Ontario (Bill 80 – Ontario Service Dogs Act, 2016; passed first reading).

The draft standards conflict with existing legislation, and potentially with proposed legislation; as such, this puts the draft standard in conflict with CGSB policy 6.1.7.

Because of the obvious conflicts between the draft standard and existing or proposed legislation, it is worth considering to what extent the development of these draft standards may represent a lobbying effort by some members of the Committee on Service Dogs, intent on swaying elected officials. As such, the draft standard might be viewed by some as interfering with the provincial legislative process.

CGSB policy 6.4.1 Project Proposal and Agreement

"CGSB may request additional information from the requester or hold an exploratory meeting to adequately define the work item. CGSB is responsible for managing, and normally chairs, the exploratory meetings that typically include CGSB and key stakeholders. When the work item has been adequately defined, CGSB prepares a project proposal, including a work plan, a draft scope and identifies required funding. When an agreement has been reached on the terms of the agreement and the funding has been established, CGSB prepares an agreement."

An exploratory meeting was held October 2014 with a selection of individuals (the process to select these individuals has not been disclosed). However, once the Committee on Service Dogs began meeting in

October 2015, the scope of the work changed significantly. Although we are awaiting the release of a copy of the NWIP, the funding agreement with VAC, and the work plan that went to the Committee on Service Dogs in October 2015, it is safe to say that these documents were designed to focus on PTSD dogs. The process to develop plans for a narrow scope is inadequate with the new, broader scope. No effort was made to return to the beginning of the process, engage appropriate stakeholders, and properly define the work.

By not restarting their standard-setting process when the Committee on Service Dogs broadened its scope, CGSB is in violation of its policy 6.4.1.

CGSB policy 6.5.4 Harmonization with an International/Regional Standard and Other Standards

As mentioned in Chapter 2, no weight was given to existing standards and accreditation processes that are in place from the IGDF, or ADI. These standard-setting organizations are recognized in provincial legislation, and are recognized in many countries. The excuse for ignoring the work of these organizations is that their standards were not developed using a “consensus model”, and thus are not recognized by ISO.

The IGDF and ADI standards were developed with considerable international input. Further, a search of ISO material suggests they do not have any human services standards, and their standards classification system does not accommodate human services standards. So, ignoring internationally recognized standards on the basis that they are not within ISO’s documents seems to be nonsensical, as it is not anticipated that they will ever address human services matters.

With the understanding that CGSB is attempting to develop public policy in the human services arena, they should have been willing to adopt existing, well-established standards. By not doing so, they have violated their policy 6.5.4.

CGSB policy 6.5.5.1 Draft Development

“When there are no relevant international, regional or national standards, drafts may be prepared by: the CGSB TC Secretary in consultation with the requester, the sponsor or other interested parties; a single technical expert such as a TC member, a technical expert, an industry association or other organization; the TC as a whole; or a working group established specifically for the task.”

Setting aside the failure to adopt existing international standards, CGSB activities were technically in compliance with this policy; however, a comment is still prudent.

The area of disability policy is complex, and not conducive to writing-by-committee; however, a decision seems to have been made to use the Committee on Service Dogs and some working groups to accomplish much of this writing task, resulting in confusion and tensions on the Committee.

When working groups were first struck, no time was spent defining each working group’s terms of reference and scope. This resulted in considerable loss of time and wasted effort until appropriate terms of reference were finally established (NB, these terms of reference have not been made public, but would be useful to assess the quality of each working group’s contribution and whether they remained within scope).

So, CGSB complied with this policy, but its implementation was messy and ineffective.

CGSB policy 6.5.3 Technical Committee

“For the new work item, CGSB shall establish a new TC or update an existing TC and assign a Committee Secretary.”

There are quite a few matters of concern regarding the technical committee (i.e., the Committee on Service Dogs). So much so, that they deserve a section to themselves. So, we will cover the Committee on Service Dogs in some detail in Chapter 5.

Chapter 4 Conclusion

We have seen how CGSB’s standard development process tends to be linear, so is not conducive to effective public policy development which requires more fluidity and better, ongoing connection to diverse stakeholder groups. We have also seen how the process lacks any evident implementation strategy and has no way to measure its own success. This is probably because, with the increased scope, the actual policy problem was never properly defined. The process even ignored important Government of Canada and provincial government directions and initiatives that are directly related to the draft standard’s subject matter. Finally, several areas of CGSB policy were simply not complied with, or were implemented in a way that was ineffective.

Chapter 5: The Missing Ingredients for Success – Transparency and Accountability

Chapter 5 Introduction

We have moved from “context” and “principles” in Chapter 3, to processes in Chapter 4. Now we complete our drill-down look at the work done by CGSB in its preparation of the draft service dog team standard. The last level of detail is a look at the CGSB’s Committee on Service Dogs.

Then, we will raise our sights to a higher level again. We will see how the lack of appropriate “policy positioning” underpins so much of what is wrong with the draft policy, and had there been more transparency and clear accountability throughout the development of the draft standard, it would have remained focused on the problems it was intended to resolve.

Committee on Service Dogs – Lots of Questions

As mentioned in Chapter 4, there are several significant matters related to the Committee on Service Dogs (referenced throughout this chapter as “The Committee”).

Scope Change

Under its policies, CGSB is responsible for establishing a “Technical Committee” from among materially and directly affected organizations and individuals to develop consensus-based documents. CGSB created The Committee to meet this requirement. According to policy, CGSB and The Committee must then jointly establish The Committee’s name and scope.

Throughout this report, we have emphasized the critical nature of The Committee’s decision to broaden its own scope, despite all the previous work that was focused on PTSD dogs. This ability of The Committee to set its own scope is problematic in principle. It could lead to unintended consequences in public policy

development as committees are likely to change directions based on the make-up of membership. Further, it opens the door to intentional manipulation of public policy if committee members have specific objectives of their own that are not aligned with the original intention of the group's mandate.

Specifically, The Committee increased their scope well beyond PTSD dogs to include all guide dogs, service dogs, and their handlers across the country. What was the motivation to do this? Why was it not stopped by CGSB? Surely someone in a position of authority would have understood that this scope change fundamentally altered the landscape on which The Committee was formed and negated all the work that had been undertaken up to that point.

An Access to Information request is outstanding that might result in the release of the original material that was given to The Committee. Once this material is available, we will be able to determine the full significance of the change. Currently, we are left with questions about how and why private citizens who were gathered to consider PTSD dogs could embark on an adventure in public policy manipulation.

Membership


CGSB policy requires equal access and effective Canadian participation to the standards development process by concerned interests. CGSB must ensure that participation in standards development is accessible to affected stakeholders, and that there is documented evidence that efforts were made to address the challenges of finding resources for participation. Setting aside the scope change, information has not yet been released publicly to substantiate how members of The Committee were chosen, so no comments can be offered on that point; however, with the scope change, the make-up of The Committee became unrepresentative of the affected stakeholders.

When dealing with human services policy, it is critical to have legal support, especially with human rights issues being central to the policy process. The Committee has no human rights legal presence, which may explain the violations of existing human rights requirements that reside within the draft standards.

There is a lack of human services policy expertise at the table. One province (Alberta) was asked to participate; however, they were not present at any of The Committee's meetings for which minutes have been made public. Even if the one province had participated, this would not be representative of various provincial perspectives that come into play when dealing with policies that lie within provincial jurisdiction. CGSB has an obligation to fill this expertise gap on The Committee.

In CGSB policy, they must seek a balance of members on The Committee among various interests, including "users", "producers", "regulators", and "general interest" members. Currently, The Committee's membership make-up is 12 producers (40%), 7 general interest (23%), 5 regulators (17%), and only 6 users (20%). This is obviously not balanced.

Having this imbalance on The Committee that is 20% users and 80% non-users reflects Canada's continuing history of marginalizing disadvantaged and vulnerable populations. For too long, disability policy has been made by "others". For too long, "others" have spoken about people and for people, rather



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than with people. The Committee and the standard development process is just another in a long line of processes that undermines the acceptance of persons with disabilities into society in every aspect of life. There is an adage in disability policy work that should guide all CGSB's work in the future, regardless of the topic: "nothing about us, without us". 20% representation on The Committee is despicable.


Further exacerbating the problem of balance, of the 30 voting members, 3 (10%) represent transportation interests, which is surely an over-representation of interests for one industry on a committee for a standard that affects the entirety of a citizen's life, not just transportation.

Potential Conflict of Interest

Members of The Committee must disclose to CGSB management any actual or potential conflicts of interest in the carrying out of their roles and responsibilities, and a member must withdraw from any discussion and voting on any work item when such a conflict of interest occurs.

Whether actual or potential conflicts of interest have been declared to CGSB has not been disclosed; however, there are several potential conflicts that are evident from the list of members, and that should have been addressed. In the documents that have been released publicly, there has been only one abstention noted in the minutes of The Committee meetings, and it is not clear what the reason for the abstention might have been.

- When the scope of the committee's work was dramatically increased, it seems likely that organizations focused on "companion" animals might see great benefit from having their organization incorporated in the new scope, with the greater visibility and public access rights that might ensue. Was this potential conflict declared?
- Producers on The Committee might benefit by having a scope and standard that closes the door to those who want to obtain service dogs and guide dogs in the US. Was this potential conflict declared?
- Those whose organizations might be producing a limited or shrinking number of dogs might benefit by creating a large assessment industry under the new requirements. Was this potential conflict declared?
- A member may represent only one organization on The Committee; however, an instance has become evident where the work of one member in support of the draft standard is appearing on another member organization's website. While this might not be a conflict, has anyone from CGSB assessed this activity for potential conflict? How many instances are there where members are supporting each other's organizations, and does this support amount to collusion? Have any declarations occurred for instances where members have an association (either directly or through close inter-personal relationships) with other organizations or individuals on The Committee or with someone who may materially benefit from The Committee's work?




"HOWEVER, THERE ARE SEVERAL POTENTIAL CONFLICTS THAT ARE EVIDENT FROM THE LIST OF MEMBERS, AND THAT SHOULD HAVE BEEN ADDRESSED."

It is easy to construct scenarios where conflicts of interest would be at play on The Committee. Stakeholders deserve public assurance that conflicts have been declared and addressed, and that CGSB is actively monitoring this aspect of policy development.

A Financial Burden for Public Consultation

We have emphasized the importance of consulting with affected stakeholders throughout the policy development process. It is difficult to reach out to people and obtain their views at the best of times; it is even more difficult to convince people to commit their time for a committee that is expected to have many meetings in a distant place over an extended time. Further, when the stakeholder group in question is characterized by having difficulty travelling, and often living in poverty, the challenges of obtaining involvement are large. CGSB's approach increases these difficulties by not covering travel costs for The Committee's members. This is highly unusual for Government of Canada policy development exercises, and dramatically reduces the pool of stakeholders from which CGSB might draw participants.

This model probably works for CGSB's normal business when they are dealing with corporate clients, but now that they have embarked on public policy development in the human services area, they need to recognize that committee members cannot be expected to pay their own way to attend meetings, nor find an organization to support them.



“EACH MEMBER OF THE COMMITTEE WAS REQUIRED TO SIGN A NONDISCLOSURE AGREEMENT AT EVERY MEETING THAT EFFECTIVELY MUZZLED THEM FROM SEEKING INPUT FROM OTHERS.”

Oath of Secrecy

In the development of standards and public policy that will affect the daily lives of a broad sector of the public, there ought to be an expectation that The Committee consults with their organization and their stakeholders, and CGSB ought to ensure a public consultation process is facilitated. In this way, members understand they represent their organization's or their constituents' views above their own. The lack of a public consultation before draft standards were developed is reflective of CGSB's unpreparedness to undertake human services policy.

However, even with the supposition that consultation would occur within organizations, each member of The Committee was required to sign a nondisclosure agreement at every meeting that effectively muzzled them from seeking input from others. This agreement requires as follows:

- I acknowledge that as a contributor at the Technical Committee Meetings, I have access to information that is confidential or proprietary to third parties, to information that is conceived, developed or produced during the meetings and to information that is otherwise unavailable to the public, including all discussions held during the meetings.
- I agree that I will not reproduce, copy, use, divulge, release or disclose, in whole or in part, in whatever way or form any information described above to any person other than a person employed by CGSB and other current members of the Technical Committee. I undertake to safeguard the same and take all necessary and appropriate measures to prevent the disclosure of or access to such information in contravention of this agreement.
- I also agree to waive all rights, copyright, title and interests to any work product, materials or any other contribution provided by me during the CGSB Committee on Service Dogs Technical Committee Meetings and that all such contributions shall be the property of the CGSB exclusively. I understand that I am required to identify any patented or otherwise legally protected items in the information I provide.

- I acknowledge that as a member of this committee, I have a duty to remain neutral, fair-minded and non-partisan in the consideration of all issues pertaining to the work of the Technical Committee.
- I acknowledge that I will not influence, or otherwise take part in a decision of the Technical Committee knowing that the decision might further my private or political interest.
- I understand that if in the opinion of the Committee Leadership (Chair, Vice Chair, Secretary, CGSB representative) a conflict of interests exists as a result of the information I disclosed or any other information brought to the Committee's attention, the Committee Leadership may require me to take steps to resolve or otherwise deal with the conflict or, at its discretion terminate the relationship it has with me.

So, despite its own policy (5.9.1 "All members shall... communicate with their organization's management with respect to standardization activities."), CGSB purposefully restricted the level of consultation by using a nondisclosure agreement. At best, even if members were inclined to break their agreement and engage with their work colleagues, this agreement certainly discourages members from consulting with the community about The Committee's activities and creates misunderstandings, mistrust and difficulty in obtaining accurate information.

It is important to note that, even if The Committee had been unmuzzled, 70% to 80% of guide dog users in Canada acquire their dogs from American schools and do not belong to any member organization that sits on The Committee – an example where The Committee should have been re-cast after the scope was changed.

Tone Deaf – Missing the Necessary Policy Positioning

We are coming near the end of our analysis of the processes used to develop the CGSB draft service dog team standard, and to finish off we need to elevate our perspective to higher-level concerns. We need to turn from details about processes and how committees work, to consider three larger issues. The first we might call "policy positioning".

Because of its lack of policy development experience in the human services arena, CGSB and The Committee are "tone deaf" to the implications of their policy choices, so it has fallen to advocates to point out shortcomings and raise alarms.

Assess the School, or Assess the Person?

The current law in some provinces and the approach used in many other jurisdictions is to place expectations on dog training schools to produce the best product in the best way possible. Then, because of this positive output, disabled Canadians will experience the best outcomes. This places reliance on accreditation processes run by IGDF and ADI. The schools accredited by both IGDF and ADI not only do excellent work producing quality dogs for prospective handlers, but they also do ongoing follow-up and support for their graduates to ensure quality outcomes continue to be achieved for the life of the dog / handler team. It is only in the case of those who choose to train their own dog (i.e., no accredited school is involved) that jurisdictions provide for an individual assessment to be administered so they may become legitimate dog / handler teams for legal purposes.

The CGSB draft service dog team standard introduces an entirely different policy positioning. It ignores the dog training schools and places full reliance on individual assessment and monitoring of each dog /

handler team. How this assessment mechanism will work, to whom it will report, how it will be paid for, and how the assessment process will be monitored are all left to the imagination. Surely, it will represent a large bureaucracy paid for either by tax payers, or by placing the financial burden on disabled individuals, many of whom are already impoverished.

Aside from the implementation and cost implications, this shift in policy positioning away from monitoring the industry and towards monitoring disabled Canadians creates a structure that will intrude on people's lives, violate their rights, and return disabled Canadians back to an institutional, paternalistic, care-based model of services, rather than the inclusive, values-oriented, rights-based approach that currently exists.

Focus on Dogs, or Focus on People?

The policy proposal that is contained in the draft service dog team standard focuses on the dog / handler team, and looks for standardization across all types of dogs. This focus on the dog misses the importance of putting the person at the centre of human services policy development and considering all aspects from the person's perspective.

A person-centred policy development process would have quickly identified that people who are blind, deaf, physically, emotionally, or intellectually challenged all have different needs within a dog / handler team. Why would we expect that one standard would suffice for all, just because a dog is the common denominator?


By positioning the policy in a dog-centric context rather than a person-centred context, CGSB lost the opportunity to truly identify the needs of people that might (or might not) need to be embedded in policy.

Lack of Transparency

The next "larger issue" to consider is transparency.

The process to develop public policy requires openness and transparency. On paper, CGSB policies and procedures provide an open and transparent process; however, in practice, the experience with this standard has been opaque, if not secret.

The initiation of this work by private interests, the involvement of VAC, and all the policy development work and research that might (or might not) have taken place before it was decided that a standard was required, happened behind closed doors from sometime before September 2013 until a project agreement was signed with VAC in May 2015. At that point, CGSB was required to make public their intention to undertake standards work; however, that process is seriously flawed.



"THE CGSB DRAFT SERVICE DOG TEAM STANDARD INTRODUCES AN ENTIRELY DIFFERENT POLICY POSITIONING. IT IGNORES THE DOG TRAINING SCHOOLS AND PLACES FULL RELIANCE ON INDIVIDUAL ASSESSMENT AND MONITORING OF EACH DOG / HANDLER TEAM."

Two CGSB policies apply:

“6.5.1 Notice of intent of new work item – CGSB shall publish a notification of the new work item.

6.1.15.2 Notification requirements – a. Notice of intent (notification of new work item); CGSB shall inform the Canadian public by providing their notices of intent to the CNS platform when it has taken the decision to develop or adopt a new standard or other regional / international deliverable, new edition, amendment, reaffirmation or withdrawal of an already published standard... Notices of intent shall be submitted in both of Canada’s official languages.”

CGSB may have posted an appropriate notice of intent for their work on this standard; however, it should have been clear to them that few, if any, disabled Canadians are in the habit of monitoring standards development on obscure websites. Those that do monitor such things likely would have seen that the work related to PTSD dogs, and not become too concerned.

In an area where human services policies are being impacted and the daily lives of a broad cross-section of Canadians will be affected, there needs to be a higher standard for informing the public than simply putting it on the web. There should have been press releases and public notices; Members of Parliament and provincial elected officials responsible for disability policy should have been notified. In addition to using both of Canada’s official languages, especially when dealing with an area directly impacting the lives of blind Canadians, notices from CGSB must be available in alternative formats – this is Government of Canada policy that was not complied with.

The secrecy continued during development of the draft standard due to the nondisclosure agreement that The Committee members needed to sign.

Following the development of a draft, CGSB is required to hold a “public enquiry” stage. Again, two policies apply:

“6.7.1 Notice of public review

6.1.15.2 Notification requirements – b. Notice of public review; CGSB shall notify the Canadian public in a suitable medium of standards available for public review. The public review shall be a minimum of sixty (60) calendar days when a mature draft is available and shall be completed before the final approval by the TC. The notice shall include the start and end dates of the review period. The notice shall indicate how to obtain a copy of the draft standard. This minimum period of sixty (60) calendar days may be shortened with appropriate rationale and action to proactively inform affected stakeholders. Appropriate rationale may involve health and safety reasons for the public or the environment.”

Because Canadians who would be affected by this standard were not aware that the work was underway, they were surely not aware to look on an obscure website to discover that a public enquiry process had begun and that they should review the draft standard. We discussed in Chapter 2 the efforts that needed

to be taken to achieve access to review and comment on the draft standard and the sense of disenfranchisement that resulted.

So, the process up to the public enquiry stage has been largely held behind closed doors, and the “public” enquiry stage was seriously flawed, putting those affected at a disadvantage. Had the process been more transparent, the stakeholders who were originally affected (those with PTSD) could have become engaged much earlier in the process and helped to guide the policy process in a more effective way. Once the scope was changed, an appropriate level of transparency would have ensured that affected stakeholders were informed and engaged to provide feedback that the new standard was not required in broader scope of things.

Accountability – Confusion

The final “larger issue” to consider is accountability.

There is no clear accountability for this draft standard.

- The work seems to have been initiated by private citizens
- VAC is involved and providing funding
- Other federal agencies that have appeared at various committee tables include the Department of National Defense, Armed Forces Canada, Transport Canada, and the Canadian Transport Agency
- CGSB under Public Service and Procurement Canada is running the development process
- The Minister of Sport and Persons with Disabilities is conducting extensive related public consultations
- Canadian provinces hold constitutional jurisdiction over the subject area; Alberta has a seat at The Committee, but has not participated
- The draft standard creates an assessment / compliance function but it is not stated who will run that process nor who they will report to

No one can point to who among elected officials will be accountable to the public for the implementation of this standard and for this change in public policy. As a result, advocates have been forced to use a “shotgun” approach, blanketing many ministries with their concerns, engaging with their MPs, and copying in the Prime Minister’s Office.

With the lack of accountability, disabled Canadians are fearful that unaccredited producer organizations, uninformed businesses, and/or the public-at-large will simply begin to apply the standard without regulatory sanction, thus undermining human rights codes, and reducing or eliminating existing legal rights. At the very least, this would create mass confusion about which rules apply in which jurisdictions.

Given the participation on The Committee of Transport Canada, the Canadian Transport Agency, and the National Airline Council of Canada (fully 10% of committee votes), there is fear that the airline industry will hold some accountability for implementing the standard. The relationship between this industry and disabled Canadians has not always been positive, so there is fear they have a motive to curtail travel by disabled Canadians.

If accountability had been clear to Canadians, affected stakeholders would have known who was responsible for each process; they would have been able to become involved more effectively to communicate their needs and to redirect the process back to its original intent.

Advocacy Will Continue

Because of how things played out, guide dog and service dog users have no trust left for this process or its players.

Despite the fear and suspicion that has been created, guide dog and service dog users are more than sympathetic to the cause of disabled veterans who suffer from PTSD and would benefit from having a Trauma Assistance Dog (or whatever term is developed through ADI's consultation process). Many stand ready to assist and provide advice and guidance within an appropriate policy development context. However, due to the loss of trust in the CGSB process and the Committee on Service Dogs, users are resolute in their commitment to advocate against this standard until it is withdrawn.

Chapter 5 Conclusion

Considering all the factors we have examined in previous chapters of this report, and now seeing concerns and questions about CGSB's Committee on Service Dogs, lack of transparency throughout the standard development process, and lack of accountability for the process and its results, as the title of this report suggests, this truly has been "a failed process".

Chapter 6: Moving Forward – Finding Some Wins with a Different Approach

Chapter 6 Introduction

In this final chapter, we will summarize the concerns we have covered in previous chapters. Then, in the interest of turning to a more positive tone, we will provide a very brief analysis of the original policy problem as we see it, and offer recommendations for how to find some "wins" with a different approach.

Summary

The goal we set ourselves at the beginning of this report was to mostly set aside the content of the draft service dog team standard, and instead to focus on the processes that were followed in its development. It was felt that this would help us to more deeply understand why the draft standard is so flawed.

CGSB and its Committee on Service Dogs started with one mandate – to address issues related to PTSD dogs – but quickly changed the scope to incorporate all guide dogs and service dogs in Canada. They ignored existing accreditation and standard-setting bodies in favour of developing a made-in-Canada solution. And on the PTSD front, they ignored significant developments and progress regarding PTSD dogs in the US, resulting in PTSD dog standards in Canada being delayed years longer than they needed to be, more veterans suffering longer, and more unaccredited trainers victimizing veterans and funders.

CGSB and its Committee on Service Dogs did not merely intend to develop a voluntary standard, as they have stated to the public; they intended to develop public policy that would become mandatory. In this effort, they failed to apply good public policy principles, failed to use good public policy processes, and did not develop any implementation plan. They ignored existing provincial laws and federal government initiatives; they strayed from statements made before a committee of Parliament, and ignored broad

policy direction from the Prime Minister. They positioned their policy in a way that would violate the human rights of vulnerable Canadians. All this in an area where they have no legal jurisdiction, and without the participation of those who do hold responsibility.

The process that CGSB and the Committee on Service Dogs followed lacked transparency and accountability, and the Committee itself was constituted in a way that severely under-represents impacted people, and over-represents organizations and individuals who have potential conflicts of interest. To make matters worse, each committee member and all participants are required to sign a nondisclosure agreement that places the proceedings in a state of secrecy. Even now, advocates are reticent to meet with the Committee because their subsequent advocacy efforts would be hampered by the secrecy oath they are required to sign; thus, the Committee is working in an echo chamber of their own opinions, not hearing voices of dissent.

Is there any wonder that stakeholders have reacted negatively?

The Way Forward – A Problem Redefined

In looking for a positive path forward, we must return to the original problem that gave rise to all this activity. As mentioned earlier in this report, problem identification, definition, and analysis is at the heart of policy development. So, before offering recommendations for how to move ahead, we will provide a short beginning to a new problem analysis.

Returning to the specific issues presented to CGSB related to PTSD dogs, we see there are three related public policy problems that require different solutions.

Growing Demand in a New Field

A growing number of people who suffer from PTSD are realizing they can experience a better quality of life by having a specially-trained dog to assist them. This is a new and developing field, and experience in the United States is showing good results, thus increasing the visibility of dogs as a potential aid for PTSD sufferers.

The growing demand in Canada led to a shortage of well-trained dogs from accredited training schools. This shortage had three results, each of which presents its own set of impacts. To meet the demand for PTSD dogs:

- Unaccredited trainers entered the industry;
- Unscrupulous trainers entered the industry; and
- People trained dogs themselves.

No doubt, the increased demand and emergence of unaccredited trainers also created organizational stresses among accredited schools.

Funders have played a major role in exacerbating the problem by not distinguishing between accredited and unaccredited training options, facilitating the growth of unacceptable dogs in the PTSD community, and moving badly-needed financial resources away from accredited organizations.

Contrast this with the history of guide dog training, where a process over many decades has seen schools almost universally choose accreditation as the path to quality, driven by discerning funders who have

almost exclusively restricted funding to accredited schools. Further, users have been very careful in choosing almost exclusively accredited schools. In the case of guide dogs, accreditation equals success.

So, the policy problem is a question of how to support the growth of a successful industry that produces quality dogs so those with PTSD can achieve positive outcomes. How can accredited schools be better supported financially? How can unaccredited schools / trainers be moved into accreditation, and unscrupulous trainers be frozen out of the industry? For those dogs that continue to be trained by individuals or unaccredited trainers, how can users, funders, and the public be assured that they are going to fulfill their role successfully?

Public Access Concerns for a New Type of Dog / Handler Team

Relatively, there is good public awareness about guide dogs, and their rights and responsibilities for public access are legally entrenched. This is the result of decades of hard work conducted by schools, advocates, and individual blind people to educate and advocate for rights. Access rights for service dogs are not as mature, but jurisdictions are beginning to provide legal backing in this area as well.

With the burgeoning PTSD dog environment, handlers have an expectation that the same access rights as other service dogs and guide dogs will be provided. However, service dog access, being newer, is not as well-understood by the public as guide dog access. In addition, service dog organizations, advocates and users have not done the same amount of on-the-ground legwork as has occurred with guide dogs.

The proliferation of poorly-trained service dogs has created a backlash against public access rights. Making matters worse, those who claim that their pet provides them with needed emotional support are trying to claim public access rights. This undermines the acceptance of all legitimate guide dog and service dog users in the public arena and gives rise to the “fake dog” problem. How can the public effectively differentiate “fake dogs” from legitimate guide dogs and service dogs?

While there are generic public access issues, some industries present specific or acute issues. Such industries as food services (restaurants, bars), transportation (taxis, airlines, trains, buses) and accommodations (hotels, motels, bed and breakfast) have all been at the centre of access-denial concerns. There are some spaces where access denial arises because they sometimes claim to not be “public” – examples include schools, rental apartments, and hospitals. Often, members of these organizations or owners of these spaces claim that the rules and expectations for access rights are not clear.

Dog users diverge on the topic of carrying and showing identification cards. Some feel this is a reasonable expectation to prove they are legitimate users with the right to access public places with their dog, while others feel they ought to be free to travel in public without being asked for an identification card to show their dog is a legitimate guide dog or service dog.

In cases of access denial, there are often legal remedies, but these require processes that are financially or procedurally onerous, or otherwise not easily available to disabled individuals. Often, in Canadian



THREE-PRONGED PROBLEM:

- GROWING DEMAND IN A NEW FIELD
- PUBLIC ACCESS CONCERNS
- DIFFERENCES ACROSS JURISDICTIONS

jurisdictions, remedies rely on human rights complaints, which are neither timely, nor effective in addressing the underlying humiliation and stigma that results from a case of access denial. Police officers, who are usually the only authority figure available to a dog handler during an access denial dispute, are often uninformed in this area of law, as it is a low priority for them.

So, the public policy problem is a question of how to ensure public access for legitimate dog / handler teams while eliminating those who illegally claim access rights, and reducing instances where members of the public seek documentary evidence of the legitimacy of the team. How can access rights be made clear for both the public, and for those specific industries and spaces where problems most often arise? How can access rights be most effectively enforced?

Differences Across the Country

Canada is a federation where responsibility for the laws governing guide dogs and service dogs resides with the provinces. Dog users sometimes struggle when travelling across the country because the laws they have at home do not necessarily apply where they are visiting, and rules for how they may identify themselves as legitimate guide dog or service dog users are different, or might not be accepted in different provinces.

Some provinces have laws and regulations in place, while others rely on their respective human rights commissions or tribunals to adjudicate disputes. Some have had open and transparent policy development processes, while others have remained conspicuous by their lack of attention to public access issues.

So, the public policy problem is a question of making provinces aware of issues and concerns related to the guide dog and service dog problems described above, and actively and aggressively advocating for improved and consistent approaches across the country. How can the provinces best be brought together in this area of public policy that is important to a relatively small, but determined group of Canadians? What role can the Government of Canada play in bringing the provinces together?

A New Beginning for Problem Analysis

This forms the beginning of a thorough public problem analysis. Much more ought to be done to flesh out quantitative issues (how many guide dogs, service dogs, PTSD dogs are there in Canada by province? How many people are waiting for each type of dog? How many trainers are there who are within accredited environments versus unaccredited? Etc.). Much more needs to be done to document impacts. In short, reference should be made to the good public policy principles and processes that were described earlier in this report.

That all being said, the problems that are described above, in concert with the many issues with CGSB's draft service dog team standard that we have identified throughout this report, are sufficient for us to make some important recommendations for getting onto a winning path.

Recommendations

While most of these recommendations are directed to government, there are also important aspects that are directed to users, advocates, trainers, and schools.

1. Stop the Current Process

The preponderance of evidence from this review shows that it is a failed process. Stakeholders have lost trust in both the process and the participants; no amount of fixing will win that trust back. So, the most effective first step to get back on the right track is to withdraw the draft standard and abandon the current process.

In government, it is often easier to let an existing process run its course, even if it becomes evident part way through that the results will not be useful – in the end, the results get buried in a report that is simply never actioned. However, in some cases it is important to take the more difficult decision, which is to actively stop a process in mid-stream, admitting that mistakes were made. This is one of those cases.

In the medical profession, there is the concept of *primum non nocere* – “first, do no harm”. The concept holds that an existing problem might be better left alone if the solution is going to cause more harm elsewhere. In the case of this standard development process, in the drive to solve a problem related to PTSD dogs, the approach that has been chosen will do significant harm to guide dog and service dog users across the country. Surely not a reasonable trade-off, and certainly a process that must be stopped now.

2. Introduce Accountability and Acquire Policy Development Expertise

Because stakeholders have lost faith in both the process and the participants, it is not possible for CGSB to continue to lead any efforts in this policy area. We have shown that they do not have the appropriate expertise to carry out human services policy development.

A decision must be made about which area of government is responsible to lead the policy process. The answer to this is not easy, nor clear. VAC seems to have the impetus to move forward, but the provinces hold jurisdiction, and the issue affects many more PTSD sufferers than just veterans. For this reason, to the extent the Government of Canada wants to move in this policy area, it is recommended that the Minister of Sport and Persons with Disabilities (SPD) be given the lead role, with a firm mandate to involve VAC and the provinces at the outset and throughout the process.

The idea would be to appoint a lead minister who would be accountable for the policy process at the federal level, recognizing that implementation responsibilities will shift to the appropriate jurisdictions once policy solutions have been developed.

Ensure there are clear reporting requirements to the Minister so progress can be monitored and reported to stakeholders and the public. The objective is to ensure that good policy development principles and processes are followed, the project is maintained within scope, and completed in a timely manner.

3. Introduce Transparency and Open Up the Process

Because of a lack of communication, many affected stakeholders are still unaware that this draft standard was developed and might have affected their lives. Whoever is accountable for the new process must be mandated to ensure it is open and transparent to all stakeholders.

Ensure users are in a strong position to influence policy outcomes. Ensure those who might experience cross-impacts or unintended consequences are engaged. Ensure existing accreditation organizations are

represented (ADI, IGDF), so that existing accreditation and standards are used, rather than reinvented. Ensure there is open communication to all those in the public that are interested at every step of the process.

4. Create a Three-Pronged approach to Reflect the Three Policy Problems

There will be different needs and different participants for developing a solution to the problems associated with addressing the growing demand in the new field of PTSD dogs, compared to ensuring access rights are addressed, and dealing with the variety of legal approaches across Canadian jurisdictions. It would not make sense to have one process try to address all these areas; however, in whatever jurisdiction addresses these challenges, it is important to make all the processes accountable to the same minister. This will ensure a coherent policy response across all three areas.

It must be up to the those with policy development expertise to develop and oversee the three processes, but it would be recommended that stakeholder input be acquired in developing these solutions to ensure public buy-in for each process.

5. In Addressing Growing Demand, Seek to Regulate Industry, Not Individuals

The CGSB's draft service dog team standard that requires assessments of every dog user in the country runs so far counter to the precepts of human rights that it is necessary that we make a specific recommendation against this idea being raised again. It comes from two factors: 1) unaccredited producers being in control of the standard development process, and 2) a lack of understanding of the policy problem. As we illustrate above, the problem is not users. The problem is unaccredited and unscrupulous trainers and a lack of funding for accredited schools. The solution lies in the industry, not with the users. The solution lies in a focus on accreditation for schools and their trainers.

For those who find that training their own dog is best for them, and thus there is no third-party accreditation to ensure quality, there are solutions already in place in some jurisdictions that provide for a provincially-mandated assessment that gives legitimacy for these dog / handler teams.

6. In Addressing Public Access Concerns, Build on Success

It is recommended that there be two areas of focus to enhance public access rights.

SEVEN RECOMMENDATIONS

Stop the current process

Introduce accountability and acquire policy development expertise

Introduce transparency and open up the process

Create a three-pronged approach to reflect the three policy problems

In addressing growing demand, seek to regulate industry, not individuals

In addressing public access concerns, build on success

In addressing differences across the country, strong advocacy will win the day

First, all governments, dog users, trainers, schools, advocates, and allies have a responsibility within their own spheres of influence to educate the public. Most importantly, it is the exercising of the personal responsibility of the user and their dog in every-day interactions with the public to always educate and always portray a positive image of the dog / handler team so that people learn to respect them, and the next handler who comes along can benefit from an improved reception. These rights are not simply handed out to a dog user for free – there are responsibilities that go with the rights.

Second, there are jurisdictions in Canada that already have successful legislation. Build on those approaches, rather than inventing new ones.

7. In Addressing Differences Across the Country, Strong Advocacy Will Win the Day

The Government of Canada can attempt to pull provinces together to address this policy issue, but stakeholders need to be realistic – this is not an area of significant concern in federal / provincial relations; there is some skepticism that federal / provincial discussions can have any impact here.

What will have an impact is the strong and coordinated advocacy from citizens at the provincial level. Consideration needs to be given to creating a coordinated advocacy effort whereby a coalition of users and their allies can work together towards ensuring legal protections are in place in every province, that those protections are as consistent as possible, and that each province recognizes dog / handler teams from other provinces without creating hurdles that must be surmounted by users.

For advocacy to be most effective, guide dog, service dog, and PTSD dog users need to work together and support each others' efforts to further the provincial consistency agenda. There are currents of dissention within each of these groups and among them, and the more people work together towards a common goal, the less these tensions will rule the day.

Chapter 6 Conclusion and Comments from the Author

Throughout the six installments of this report, we have tried to use publicly available material to draw a clearer picture of what happened, and why the CGSB draft service dog team standard feels so wrong to so many people. The greatest tragedy in this whole affair is that it has resulted in delays for many people who desperately need the support of a service dog to help them address the issues they face from PTSD. The solution seems so clear and close, yet years have been lost in a failed process. We know that many from the dog-user community, regardless of their specific disabling condition, are ready and anxious to help move a new process forward. The sad reality is that a solid solution that focuses on building a sustainable, high-quality PTSD dog industry that focuses on quality outcomes for people is still years away, and the years wasted on this process could have been put to much more productive use.

Although this report was originally published on the WordPress site, CanadianGuideDog.WordPress.com, we will continue to advocate on behalf of all guide dog and service dog users.

Our goals should be to ensure a healthy accreditation-based industry, to develop and sustain funding streams that make sense and support quality outcomes rather than profit motives, to ensure laws are in place that support public access and help everyone distinguish fake dogs, and to help attain consistency across the country.

Annex 1: Acronyms

Acronyms that are used frequently within the report are defined when they first arise in the text. They are listed here in alphabetical order for easy future reference.

ADI	Assistance Dogs International
CFAS	Canadian Foundation for Animal-Assisted Support Services
CGSB	Canadian General Standards Board
IGDF	International Guide Dog Federation
PTSD	Post Traumatic Stress Disorder
SPD	Ministry of Sport and Persons with Disabilities
TC:	Technical Committee (this is a generic CGSB term; for the service dog team standard, the TC was the Committee on Service Dogs created by CGSB)
VAC	Veterans Affairs Canada

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