

# **POSITION PAPER: THE HAVOC ACT, 2026**

## **A Legislative Framework for Accessible, Trauma-Informed Canine Interventions and Universal Benefit Recognition in Ontario**

### **1. Executive Summary**

Ontario's frontline Emergency Services Personnel (ESP) and Public Safety Personnel (PSP)—including professional and volunteer firefighters, paramedics, police officers, special constables, emergency dispatchers, and correctional staff—face unprecedented rates of Post-Traumatic Stress Injury (PTSI) and Operational Stress Injuries (OSIs). While clinical evidence supports the use of task-trained psychiatric service dogs to mitigate acute trauma symptoms, current administrative and institutional frameworks create insurmountable bottlenecks.

Injured personnel routinely face multi-year waitlists and prohibitive costs through institutional service dog providers. Simultaneously, restrictive gatekeeping prevents qualified, self-trained, or privately-trained canine teams from receiving formalized recognition, regardless of their public composure or task competency.

The Havoc Act is a proposed legislative initiative designed to modernize service dog access across Ontario. By harmonizing provincial legislation with the existing principles of the Accessibility for Ontarians with Disabilities Act (AODA)—which recognizes a service animal based on functional need and medical documentation from a regulated health professional—the Act eliminates institutional monopolies. Furthermore, it establishes that any recognized, industry-standard Public Access Test (PAT) satisfies public safety requirements, and mandates that all social assistance programs, workplace safety boards, and benefit frameworks universally recognize task-trained service animals as legitimate, coverable recovery tools.

### **2. Background & Legislative Context: Harmonizing Provincial Law**

Under the Accessibility for Ontarians with Disabilities Act (AODA) and the Ontario Human Rights Code (OHRC), a service animal is legally recognized when it is readily identifiable or

accompanied by documentation from a regulated health professional confirming that the individual requires the animal for reasons relating to a disability.

Despite this clear legal foundation, a severe disconnect exists across other provincial frameworks:

- **Administrative Contradictions:** Workplace insurance programs, municipal regulations, and social assistance benefit structures frequently reject AODA-compliant teams, imposing arbitrary requirements for institutional "accreditation" or vendor-specific pedigree.
- **Systemic Disalignment:** While the law recognizes medical necessity, government benefit frameworks fail to provide corresponding recognition or financial support for the maintenance, equipment, and care of these legitimate therapeutic tools.

The Havoc Act seeks to resolve these contradictions by harmonizing all Ontario legislation, social service frameworks, and insurance regulations to match the core principle of the AODA: medical documentation establishing need, combined with demonstrated functional task capability, constitutes a legitimate service dog team.

### 3. The Bottleneck: Institutional Gatekeeping & Excessive Costs

The reliance on centralized institutional training entities has created systemic discrimination against first responders and individuals with disabilities in crisis:

- **Prohibitive Waitlists:** Institutional waitlists routinely stretch from 2 to 5 years. A first responder or frontline worker experiencing acute suicidal ideation, severe panic, or debilitating hypervigilance cannot safely defer intervention for half a decade.
- **Financial Exclusion:** Institutionally sourced animals frequently carry costs ranging from \$25,000 to \$30,000, creating an insurmountable barrier for individuals on medical leave or receiving social assistance.
- **Monopolization of Access:** Institutional entities frequently lobby against owner-trained or privately-trained service dogs to protect their funding pipelines. This locks out capable handlers who choose to work with independent professional trainers to evaluate, task-train, and deploy individually selected dogs (including rescue and shelter candidates).

## 4. The Legislative Solution: The Havoc Act Framework

The Havoc Act introduces three primary pillars of reform designed to establish equity, accessibility, and transparency across the province.

### **Pillar I: AODA Harmonization Across All Provincial Legislation**

The Act mandates that all provincial statutes, municipal bylaws, social service rules, and insurance regulations align directly with the AODA. Once an individual provides documentation from a regulated health professional confirming the medical necessity of a psychiatric service animal, no provincial agency, benefit provider, or insurer may deny recognition based on the animal's origin or training source.

### **Pillar II: Flexible Competency Standards via Existing Public Access Tests**

Rather than forcing handlers into multi-year institutional programs or creating redundant government bureaucracies, The Havoc Act establishes that any established, industry-standard Public Access Test (PAT) fulfills public safety benchmarks.

- Handlers may demonstrate public readiness using any existing, recognized public access evaluation (such as standardized evaluations used across canine behavioral networks and community training organizations).
- Testing evaluates core functional metrics: basic obedience, public composure, environmental neutrality, and a minimum of specific disability-mitigating tasks.
- This flexible standard ensures rigorous public safety without creating financial bottlenecks or corporate gatekeeping.

### **Pillar III: Universal Recognition Across All Social Services & Insurance Frameworks**

The Havoc Act expands financial and administrative recognition far beyond workplace safety programs, embedding service dog coverage into the broader social safety net:

- **Workplace Safety & Insurance:** Mandates rapid adjudication and presumptive expense coverage for task-trained service animals supporting first responders and frontline workers with psychological workplace injuries.
- **Social Assistance Programs:** Requires provincial social assistance programs—including the Ontario Disability Support Program (ODSP) and Ontario Works (OW)—to explicitly recognize service animal maintenance, veterinary costs, and food allowances without administrative delay or clawbacks.

- **Volunteer & Auxiliary Equity:** Explicitly legislates equal access and expense coverage for volunteer firefighters, auxiliary officers, and part-time personnel, who experience the same operational trauma as full-time personnel.

## 5. Stakeholder Impact Analysis

| Sector / Group                                                   | Direct Impact of The Havoc Act                                                                                                                                                                                       |
|------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Clinical Practitioners (Psychologists / Psychotherapists)</b> | <b>Restores Clinical Autonomy:</b> Re-establishes the medical doctor or psychotherapist as the sole authority on disability need, preventing non-clinical training vendors from dictating therapeutic interventions. |
| <b>First Responders &amp; Frontline Personnel</b>                | <b>Immediate Access:</b> Eliminates multi-year waitlists, allowing personnel to actively train and deploy a service animal in months rather than years.                                                              |
| <b>Social Assistance Recipients (ODSP / OW)</b>                  | <b>Financial Parity:</b> Ensures that service dog maintenance allowances and veterinary supports are universally recognized and covered under provincial assistance.                                                 |
| <b>Independent Dog Trainers &amp; Behaviorists</b>               | <b>Professional Inclusion:</b> Allows qualified independent trainers to coach handlers toward standard Public Access Tests without institutional sidelining.                                                         |
| <b>Government &amp; Taxpayers</b>                                | <b>Cost-Effective Efficiency:</b> Leverages existing community testing standards and medical oversight, streamlining access without establishing costly new state-run training institutions.                         |

## 6. Conclusion & Call to Action

The current institutional monopoly on service animals is an unacceptable barrier to trauma recovery and disability support in Ontario. Leaving injured personnel and individuals with disabilities trapped on multi-year waitlists when viable, task-trained alternatives exist contradicts the fundamental intent of provincial accessibility laws.

The Havoc Act, 2026 creates a unified, fair, and accessible system by harmonizing provincial statutes with the AODA, recognizing established industry Public Access Tests, and extending full support across all social service and insurance frameworks.

### Key Recommendations for Decision-Makers:

- **Legislative Adoption:** Members of Provincial Parliament (MPPs) are urged to support this framework to harmonize provincial law with existing human rights principles.
- **Cross-Sector Support:** Labor unions, mental health associations, independent trainer coalitions, and disability advocacy groups are called upon to endorse the position paper.
- **Policy Alignment:** Immediate administrative review by WSIB, ODSP, OW, and healthcare insurers to integrate task-trained service animal coverage into standard benefit guidelines.