



Association of  
Ontario **Midwives**  
*Delivering what matters.*

August 25th, 2017

Tiffany Haidon, President  
College of Midwives of Ontario  
55 St. Clair Ave. W., Suite 812, Box 27  
Toronto, ON M4V 2Y7

Dear Tiffany:

**Re: Draft Professional Standards for Midwives**

We appreciate the opportunities the CMO has provided to the AOM to ask questions and better understand the College's regulatory transformation. We have provided some specific feedback on the Draft Professionals Standards document to Johanna Geraci and Marina Solakhyan, both in person and in writing. This letter addresses one over-arching concern about the need to maintain certain foundational standards that currently support midwives to uphold client autonomy and informed choice.

We understand that it is not the regulatory body's role to impose a model of practice onto the profession. However, the College has the legislated role of ensuring public protection within the context of midwifery care. In order to ensure safe and quality midwifery care, the public must know and understand midwives' scope of practice and the foundational principles that are currently found in the CMO's standards. We believe it is the College's role, in order to protect the public, to articulate these foundational principles through the maintaining of certain key standards.

We completely agree that having a less specific and prescriptive approach to regulation has the potential to allow midwives to practice with greater flexibility to meet the needs of their communities. However, midwives and midwifery care are still largely marginalized in the healthcare system and within individual institutions. This marginalization has the potential to negatively impact client care and jeopardize client safety. Such negative impacts are most likely to be seen in the following areas: client's choices regarding their care may be restricted through hospital policies; medically unnecessary transfers of care may be imposed leading to increasing clinical risks; continuity of care may be disrupted leading to poorer clinical outcomes. College standards can protect clients from these situations and the resultant clinical and client satisfaction outcomes.

Many midwives currently use College documents (such as the Home and Out-of-Hospital Births and Informed Choice standards) when challenged by physicians for supporting a client's choice. The power of a document issued by the regulatory body cannot be underestimated in terms of its ability to act as a shield for midwives advocating for the care that their client has chosen. Statements from the AOM lack the authority required to shield midwives from such encroachments the way that a statement from midwives' regulator can. Client care will be directly affected if midwives cannot challenge threats to client choice and client autonomy with the backing of these College documents.

It is for these reasons that we feel strongly that the "Midwifery Model of Care", especially the foundational principles of informed choice, choice of birthplace, and continuity of care need to be emphasized in the Professional Standards document (or in another document). Even though the current draft Professional Standards addresses these elements, they are not articulated in great enough detail to be understood by the public and interprofessional colleagues. For example, the common definition of "person-centred care" as adopted by many hospitals cannot be assumed to be the same as what is commonly understood in the midwifery community. Similarly, standard statements like: "Provide client with a choice between home and hospital births", lack specificity which could lead to physicians to challenge midwives who support clients to have out of hospital births under contentious circumstances by obstetrical standards (e.g., VBACs). The lack of specificity about VBAC in particular has the potential to negatively impact VBAC rates.

An explanation of midwifery "foundational principles", the principles that the public demanded and that led to the establishment of professional midwifery in Ontario, could be maintained in another standard (one that is not rescinded) or could be included in the overview section of the Professional Standards document. The inclusion of these principles in the Professional Standards document highlight them as the bedrock on which the professional standards are built. Clients, members of the public and other healthcare providers who access this document will understand the expectation of adherence to these foundational principles. We strongly recommend the following statements be maintained so that their importance is not minimized within a larger broader document:

- Code of ethics
- Home and Out of Hospital Birth
- Informed choice
- VBAC and choice of birthplace
- Continuity of care

We are happy to further discuss any of these points with you and again, appreciate this opportunity to provide feedback.

Yours truly,

A handwritten signature in black ink that reads "Elizabeth Brandeis". The signature is written in a cursive style with a prominent initial "E".

Elizabeth Brandeis, RM, President

Cc: Kelly Dobbin, CEO & Registrar, CMO  
Kelly Stadelbauer, Executive Director, AOM  
Allyson Booth, Director Quality and Risk Management, AOM