



December 19th, 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: Second Consultation on Draft Professional Standards for Midwives

Thank you for this additional opportunity to provide feedback on the important regulatory changes taking place at the College of Midwives of Ontario. We also appreciate the openness that College leadership and staff have shown through our countless discussions in the last 18 months about the proposed change in approach to CMO standards. Our feedback reflects what we have heard from our members both generally and during the CMO's consultation process, and also reflects the careful analysis of the various drafts by the members of our Quality, Insurance and Risk Management Committee; these committee members, as you may know, are well versed in medico-legal issues including preventative actions that advance client safety. In addition to this letter, we have provided minor feedback by email to CMO staff.

As you know, we are very supportive of streamlining standards to make the CMO's expectations of midwives more accessible, realistic and, most importantly, to allow midwives more flexibility in their practice to meet the needs of their clients and communities. We are very much in favour of a less specific and prescriptive approach to self-regulation.

Informed Choice as a Foundational Tenet of Ontario Midwifery

In response to the healthy dialogue our two organizations have had, we appreciate that the College has understood the AOM's concerns with rescinding the standards *When a Client Chooses Care Outside of Midwifery Standards of Practice* and *VBAC and Choice of Birthplace*. These documents support midwives to support client choices that fall outside medical norms and, therefore, are critical in protecting the informed choice of clients and the resultant quality of client care.

These two standards notwithstanding, we remain concerned that the very important foundational principle of informed choice will not be adequately reflected in the standards nor in other College documents, once the planned 23 rescindments have taken place. Informed choice is a definitional element of midwifery care; addressing it less directly has the potential to water-down this core element of midwifery and, therefore, to jeopardize clients' experiences of care including their experience of autonomy and agency. The College's representation of informed choice can make it clear that midwifery's understanding and provision of informed choice is very different than the understanding and implementation of informed consent practiced by many other healthcare providers.

We urge the College to reconsider integrating a detailed explanation of informed choice in the Professional Standards document or maintaining a separate standard highlighting informed choice. Articulating the nuances of informed choice as embodied in Ontario midwifery will not only protect clients but has the potential to positively influence all of healthcare in the future. Informed choice as a central tenet of health care should be an aspirational goal for the entire health care system, and currently, midwives are the leaders and role models in this area.

On-Going Communications with Members

We applaud the decision of the CMO to engage midwives and midwifery stakeholders in further consultation regarding the *Draft Professional Standards for Midwives*. We are concerned that, even with the education day dedicated to reviewing the standards, some midwives have not fully understood the magnitude of the proposed changes.

At the education day, attendees were asked about the five principles contained in this new document but not about the standards being rescinded nor about the broader context of the regulatory changes. Some attendees misunderstood the tracked changes as reflecting all of the changes from the current standards, not from the previous draft. As a result, some midwives may still be caught off guard and unprepared to integrate the standards into their practice. For example, they may not have worked to amend hospital policies on epidural and induction that may reference the current CMO standards. We trust that the College will continue to prioritize a comprehensive communications strategy with midwives as regulatory changes take place.

Evaluation Plan

And finally, as the process of consultation winds down, we look forward to the next phase of this project and hearing from the College about plans to evaluate the impact of these changes on public protection. If there is feedback we can provide on the evaluation component, as always, we are happy to continue the AOM-CMO dialogue about the CMO's new approach to regulation and appreciate this opportunity to provide feedback.

Yours truly,



Elizabeth Brandeis, RM, President

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