



November 7, 2019

Lilly Martin, Chair
Quality Assurance Committee
College of Midwives of Ontario
55 St. Clair Ave. W., Suite 812, Box 27
Toronto, ON M4V 2Y7
qap@cmo.on.ca

Dear Lilly and the Quality Assurance Committee:

Re: Second Birth Attendants

Over the last year, the College of Midwives of Ontario (CMO) and the Association of Ontario Midwives (AOM) have constructively discussed the challenges posed by Second Birth Attendants (SBAs) that are not regulated healthcare providers (RHPs) and are therefore ineligible to receive a provider card for the Neonatal Resuscitation Program (NRP). We share the CMO's commitment to the quality and safety of midwifery care in Ontario. We understand that the Quality Assurance Committee (QAC) has had concerns about the safety of non-RHP SBAs who do not meet the minimum requirements outlined in the CMO's Policy on Continuing Competencies. We are writing to share our understanding of how non-RHPs are able to be safe SBAs and to encourage the QAC to engage with these midwives before making any changes to SBA requirements or the applicability of the waiver policy.

Midwives consider their ethical, moral, and legal responsibility for the safety of care provided to clients and need to comfortably rely on SBAs at home births. For the affected communities that are often facing healthcare staffing shortages, the challenge is for a practice group to recruit adequate RHPs to provide 24/7 call coverage, but only offer a few hours of work. Some communities have been able to do so, but many other practice groups have not been able to. Instead, these midwives take all reasonable steps to ensure that their SBAs are skilled and competent to deal with any eventuality that may arise at home births.

Many of these midwives feel that their care is safer with non-RHP SBAs than it would be with those with provider cards. To have adequate call coverage with SBAs who are actively-registered regulated healthcare providers (and therefore otherwise employed), the practices would need a long list of SBAs. This results in each SBA attending no or very few home births. They feel that it is safer to have a small roster of non-RHP SBAs who are comfortable and experienced at home births; rather than SBAs who rarely attend home births and are therefore uncomfortable and inexperienced.

Midwives ensure that their SBAs are familiar with and able to access home birth equipment, that they complete and practice NRP (without receiving a provider card), and that they understand the midwifery model of care. If the CMO is reconsidering its approach to SBAs without provider cards – namely by granting waivers – we would urge you to engage directly with these midwives as part of the information gathering process. It is both important that these midwives feel that the College has heard their concerns before making changes, but also that the QAC understand what measures can be implemented to ensure safety with non-RHP SBAs. Only the midwives who are working in these practices can address these concerns and share their strategies to ensure the safety of their care.

As always, I thank you for your consideration of this letter and we look forward to the CMO and AOM's continuing discussions.

Yours truly,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Abigail Corbin, Chair
On behalf of the Quality, Insurance and Risk Management Committee

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