



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

January 16, 2020

Claire Ramlogan-Salanga, RM, President  
College of Midwives of Ontario  
55 St. Clair Ave. W., Suite 812, Box 27  
Toronto, ON M4V 2Y7

Dear Claire:

**Re: Request to defer the rescinding of the Consultation and Transfer of Care Standard**

We are writing you to request that the CMO consider deferring the plan to rescind the Consultation and Transfer of Care Standard.

In the past, the AOM has advocated for the CMO to not rescind this particular standard as midwives often use it within hospitals to advocate for their clients and to clarify the midwifery scope of practice. Nevertheless, we understand the College's aim in moving away from prescriptive standards and appreciate the value in enabling midwives to work to the fullest extent of their scope and avoid unnecessary consultations. We also appreciate the College's plan to replace the Consultation and Transfer of Care Standard with a guide on scope of practice.

This is a time of great upheaval in the health care system and many midwives are in vulnerable positions with regards to hospital and inter-professional relations. During this time of health system transformation, midwives, and thus their clients, would benefit from having a clear College standard defining when midwives are expected to manage care independently and when to consult and/or transfer care. We know that clinically unnecessary transfers of care are more likely to lead to clinical errors and negatively impact clients' experience of care.

It remains unclear how midwives will be implemented into Ontario Health Teams (OHTs). With a lack of blueprint for integration, there is a risk that midwives could be included in OHTs with a scope of practice limited by the administration of the OHT. The Consultation and Standard of Care Standard is a tool that midwives can use in negotiating their role as primary care providers with their OHT or potential OHT.

Moreover, the implementation of proposed changes to the Designated Drugs and Substances Regulation will also cause some upheaval in midwives' inter-professional relationships as what midwives consult for in relation to drugs will change. It is our experience that the vast majority of hospitals around the province are still struggling to integrate the recent changes to the Prescribing and Administering Standard and this is impacting client care.

We would suggest delaying the rescinding of the standard until the changes to the Designated Drugs and Substances Regulation have been implemented and the healthcare system has stabilized after the transition to Ontario Health Teams.

We are happy to discuss this further and to answer any questions you may have.

Yours truly,

A handwritten signature in black ink, appearing to read "E Brandeis". The signature is written in a cursive style with a small dot above the "i".

Elizabeth Brandeis, RM, President

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