

June 17, 2019

Bonnie Reib  
Director of Laboratory and Specimen Collection Centre Licensing

Dear Ms Reib:

**Re: Proposed Amendments to Regulation 682 (Laboratory and Specimen Collection Centre Licensing Act)**

Thank you for the opportunity to provide feedback to the proposed amendments to Regulation 682. We understand that the amendments are intended to support implementation of the improved newborn hearing program.

We would like to first express our support for the enhancements to the newborn hearing screening. These amendments will better integrate this screening and better allow healthcare providers and families to consider treatment options for babies with, or at risk of, hearing loss. Among other amendments, it adds the Permanent Hearing Loss Risk (PHL Risk) to the list of the laboratory tests midwives are authorized to order.

We would like to express our support for the College of Midwives of Ontario's letter of June 14 expressing disappointment that the amendments do not consider the College's request that the Ministry rescind the current list that limits the laboratory tests that midwives can order. The College has demonstrated that the current list acts as a barrier to individualized care, inter-professional collaboration, the prudent use of healthcare resources, and advances in healthcare technology and norms. Rescinding the list would allow midwives ordering authority within their scope of practice as defined in the *Midwifery Act*.

The College's request to amend Regulation 682 would conserve scarce healthcare resources, by avoiding unnecessary physician consultations, thus allowing savings to the government's healthcare budget. The AOM and the College would be pleased to continue to work with the Ministry to rescind Appendix B of Regulation 682 and achieve our shared goal of ensuring quality and cost-effective healthcare for Ontarians.

Yours truly,



Kelly Stadelbauer, RN  
Executive Director

Cc Allison Henry, Director, Health Workforce Regulatory Oversight Branch  
Strategic Policy and Planning Division, Ministry of Health and Long-Term Care

Kelly Dobbin, Registrar/CEO, College of Midwives of Ontario