



October 13, 2017

Ministry of Health and Long-Term Care
1075 Bay Street, 9th floor
Toronto, ON M7A 0A5
c/o rosabelle.sankar@ontario.ca

Dear Madam or Sir:

Re: Regulations 682 and 683 of the Laboratory and Specimen Collection Centre Licensing Act

Thank you for taking the time to review this submission from the Association of Ontario Midwives to the proposed amendments to Regulations 682 and 683 under the Laboratory and Specimen Collection Centre Licensing Act.

Registered Midwives in Ontario have provided personalized, excellent care for more than 180,000 pregnant clients and their newborns since 1994. Midwives provide complete primary care to their clients and their babies in pregnancy, labour and for 6 weeks after birth. This primary care includes specimen collection of blood, urine, swabs and pap smears, under the midwife's own authority.

Midwives are relieved to learn that the exemption of their offices from the definition of "Specimen Collection Centre" will remain, albeit in regulation instead of legislation. Maintaining this exemption recognizes the role of the College of Midwives of Ontario in overseeing the quality of midwives' practices and that nothing is to be gained by adding additional reporting obligations on midwives. This exemption protects clients' access to services, client compliance with health recommendations and healthcare costs.

Thank you very much for the opportunity to provide this submission.

Sincerely,

Elizabeth Brandeis, RM
President
Association of Ontario Midwives

Kelly Stadelbauer, RN, BScN, MBA
Executive Director
Association of Ontario Midwives