



April 4 2023

Dr. Karima Velji

Assistant Deputy Minister and Chief of Nursing and Professional Practice

Office of the Chief of Nursing and Professional Practice

19th Flr, 777 Bay St, Toronto, ON M7A 2J3

Sent via email: karima.velji@ontario.ca

Dear Dr. Velji,

RE: Follow up letter to Dr. Velji

We are pleased to hear the College of Midwives of Ontario (CMO) is collaborating with your team to modernize Schedule 2 of O. Reg 45/22 in a joint effort to improve client safety and convenience and reduce the clinical & administrative burden on our physician colleagues. We were encouraged to see your quick action to support the expansion of pharmacists' scope of practice, as well as your support for pharmacists to prescribe for six additional minor ailments - a change we look forward to in the fall. Of significance for midwives and their clients is the new route of access to anti-emetics and anti-nausea medications in pregnancy, since these are medications we, for the most part, cannot prescribe because of dated regulatory barriers. We maintain that the most appropriate access to these medications for midwifery clients would be as part of their routine care with their midwives - their primary care provider for pregnancy.

While we are glad to see any change that facilitates patients' access to essential medications and tests, we continue to have grave concerns regarding midwifery clients' lack of timely access to many common medications for pregnant individuals and newborns: vaccines, prostaglandins, analgesics, Histamine H2-Antagonists, amongst many others. These are medications that should easily be prescribed or administered as part of routine midwifery care. Over the years, the CMO has worked extensively to consult with midwives, the public and stakeholders around the safety of regulatory changes to midwives' prescribing and lab requisitions. They have proposed a number of options to the Ministry to decrease unnecessary and costly physician consultations and improve quality and convenient access to care.

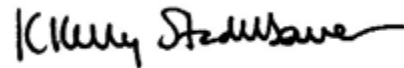
We wonder why the Ministry has not yet moved to modernize the regulations governing midwives' prescribing, given the current unprecedented strain on our healthcare system and health human resources? If pharmacists are able to prescribe for nausea and vomiting in pregnancy, why can't we - the experts in normal pregnancy and birth? It strikes us that different regulatory bodies are held to different standards, with differing timely access to needed changes, and we have growing concerns about inequities embedded into the process for regulatory updates.

Midwives play a key role in ensuring the safety of Ontario's perinatal and newborn populations. The AOM is proud of the work of Ontario's midwives: we are recognized worldwide for the quality of our care, our research and [Clinical Practice Guidelines](#) and are a model for a well-integrated, safe system. We know the CMO is ready to move forward with you to update our regulations to match best practice and our existing scope. We are happy to assist in any way.

Thank you,



Jasmin Tecson, RM
President



Kelly Stadelbauer RN BScN MBA
Executive Director

Cc: Sylvia Jones, Minister of Health, Ministry of Health
Allison Henry, Director, Health Workforce Regulatory Oversight Branch, Ministry of Health
Virginia Collins, A/Manager, Regulatory Design and Implementation Unit, Ministry of Health
Nadia Surani, Director, Primary Health Care Branch, MOH