



May 25, 2024

Hon. Sylvia Jones
Minister of Health

ATTN: Laboratories and Diagnostics Branch
Health Programs and Delivery Division
Ministry of Health
438 University Avenue, 4th Floor
Toronto, ON. M7A 1N3

Dear Minister Jones,

Re: Proposed Amendments to Ontario Regulation 45/22 (General) under the Laboratory and Specimen Collection Centre Licensing Act to expand midwives' authority to order additional laboratory tests and allow midwives to perform certain point-of-care tests.

I am writing to you on behalf of the 68,000 registered nurses and health-care professionals, and over 18,000 nursing student affiliates represented by the Ontario Nurses' Association (ONA). Our members work in hospitals, long-term care facilities, public health units, the community, and clinics across Ontario.

ONA supports the proposed amendments to Ontario Regulation 45/22 (General) under the Laboratory and Specimen Collection Centre Licensing Act to expand midwives' authority to order additional laboratory tests and allow midwives to perform specific point-of-care tests.

Midwives can uniquely provide essential pregnancy, birth and newborn care in numerous health-care settings across Ontario. Midwives significantly contribute to the overall health of women and newborns and our public health-care system. ONA welcomes the proposed amendments as they allow midwives to be more autonomous while delivering care they have the training, skills, knowledge to do so – instead of seeking the assistance of other care providers, such as nurses or doctors, to assist with providing and carrying out the order.

It is proven that access to quality midwifery care prevents maternal and newborn deaths. Midwifery care also improves multiple health-related outcomes, including but not limited to, sexual and reproductive health, immunization, breastfeeding, tobacco cessation in pregnancy, tuberculosis, Human Immunodeficiency viruses, obesity in pregnancy, early childhood development and postpartum depression. Therefore, midwives must be authorized to order point-of-care testing within their scope of practice and be able to perform point-of-care tests on collected specimens. By doing so, midwives can provide a more fulsome point of care when

needed, thus providing safer, in-the-moment, competent clinical care. In conclusion, ONA supports the proposed amendment and thanks the Ministry of Health for the opportunity to provide feedback.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erin Ariss', with a stylized flourish at the end.

Erin Ariss, RN
President, Ontario Nurses' Association