



AMERICAN OSTEOPATHIC ASSOCIATION
TREATING OUR FAMILY AND YOURS



March 16, 2017

The Honorable David Standridge
Alabama State House Boards Agencies and Commissions Committee
11 South Union Street
Suite 524-D
Montgomery, Alabama 36130

Dear Representative Standridge:

The American Osteopathic Association (AOA) and the Alabama Osteopathic Medical Society (AOMS) are writing to urge you to oppose HB 316. This bill would license midwives in the state and allow them to use the title “Certified Professional Midwife” (CPM). Unlike every other health profession in Alabama, this bill omits many details regarding scope of practice and allows a newly created State Board of Midwifery to determine the minimum education requirements for midwife licensure and the allowable scope of practice, including the use of medications. The AOA and the AOMA are concerned that deferring to a midwife-led entity to determine the appropriate scope of practice and educational requirements for a new class of practitioners, without setting education, training and competency demonstration requirements, may put the health and safety of Alabama patients at risk.

The AOA represents nearly 130,000 osteopathic physicians (DOs) and osteopathic medical students, promotes public health, encourages scientific research, serves as the primary certifying body for DOs and is the accrediting agency for osteopathic medical schools. More information on DOs/osteopathic medicine can be found at www.osteopathic.org. AOMS is a professional medical organization that represents almost 600 DOs providing patient care in Alabama.

The AOA supports the “team” approach to medical care because the physician-led medical model ensures that professionals with complete medical education and training are adequately involved in patient care. We believe that granting authority to a new class of health care provider to provide services to patients should be directly related to education, training and competency demonstration. The proposed licensure and practice of midwives authorized through this legislation fails to provide the appropriate and necessary standards needed to independently treat patients or identify signs of complicated pregnancies that require transfer to a physician.

Osteopathic medical education includes:

- **Four years of medical school**, which includes two years of didactic study totaling upwards of **750 lecture/practice learning hours** just within the first two years, plus two more years of clinical rotations done in community hospitals, major medical centers and doctors’ offices.

- **12,000 to 16,000 hours of supervised postgraduate medical education**, i.e., residencies, where DOs develop advanced knowledge and clinical skills relating to a wide variety of patient conditions.
- **Alabama-licensed physicians** must complete **25 continuing medical education hours annually**.

In order to become licensed as a CPM, this bill requires that applicants successfully complete an educational program or “pathway” accredited by the Midwifery Education and Accreditation Council (MEAC), or obtain a North American Midwifery Bridge (NARM) Certificate. The NARM certificate only requires completion of 50 continuing education contact hours within the previous five years, and MEAC accredits several types of programs whose requirements vary significantly. Post-graduate and continuing education is available but not required.

MEAC Certified Professional Midwifery educational programs:

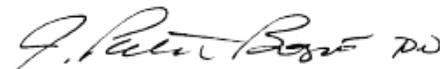
- **Vary in duration** from **one- to three-years**.
- **Vary in structure**; they can be completed **in person, online**, or via **individualized study**.
- **Vary in their curriculums** and requirements for graduation.

Health professionals’ scope of practice must be based on their level of training, education, experience and examination. Allowing CPMs who have completed minimal educational requirements (which may be done online or via individualized study) to independently care for women throughout pregnancy and delivery, and recognize complications which may be beyond the scope of their education, could place the public health and safety at risk. **The AOA and AOMS urge you to oppose HB 316.** Should you need any additional information, please feel free to contact Nicholas A. Schilligo, MS, AOA Associate Vice President of State Government Affairs, at nschilligo@osteopathic.org or (800) 621-1773, ext. 8185.

Sincerely,



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President, AOA



J. Patrick Boyett, DO
President, AOMA

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