



February 23, 2017

The Honorable Cynthia Soto  
Chairwoman  
Illinois State Health Care Licenses Committee  
288-S Stratton Office Building  
Springfield, IL 62706

Dear Chairwoman Soto:

**The American Osteopathic Association (AOA) and the Illinois Osteopathic Medical Society (IOMS) are writing in opposition to HB 677.** This bill would license midwives in the state and allow them to use the title “Certified Professional Midwife” (CPM). The bill also establishes a broad scope of practice for midwives to include independently administering approved medications, IV fluids, and performing emergency episiotomies. The AOA and IOMS believe that health practitioners’ scope of practice should be based upon appropriate education, training and competency demonstration requirements. Granting broad practice authority to a new class of practitioners without such requirements places the health and safety of Illinois 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](http://www.osteopathic.org). IOMS is a professional medical organization that represents over 3,500 DOs providing patient care in Illinois.

**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 examination. The proposed licensure and practice of midwives authorized through this legislation fails to provide the appropriate and necessary education and training standards needed to administer drugs to patients, administer local anesthetic, 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.
- **Strenuous continuing education requirements** for AOA board certified physicians, who participate in Osteopathic Continuous Certification. This process includes lifelong learning and continuous education, cognitive assessment and practice performance and assessment in order to ensure that board certified DOs maintain currency and demonstrate competency in their specialty area. Illinois-licensed physicians must complete **150 continuing medical education hours** per three-year renewal period.

The Honorable Cynthia Soto

February 23, 2017

Page 2

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.

**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 IOMS urge you to protect the safety of Illinois patients by opposing HB 677.** 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,



Boyd R. Buser, DO  
President, AOA



Melanie R. Jessen, DO  
President, IOMS

CC: Mark A. Baker, DO, AOA President-elect  
William J. Burke, DO, Chair, AOA Department of Governmental Affairs  
Richard Thacker, DO, Chair, AOA Bureau of State Government Affairs  
Adrienne White-Faines, MPA, AOA Chief Executive Officer  
Laura Wooster, MPH, Senior Vice President, AOA Public Policy  
Nicholas Schilligo, MS, Associate Vice President, AOA State Government Affairs  
Krystal White, MBA, Affiliate Executive, IOMS