



AMERICAN OSTEOPATHIC ASSOCIATION

TREATING OUR FAMILY AND YOURS



TO: Members of the Maryland State House Health and Government Operations Committee

FROM: Maryland Association of Osteopathic Physicians
American Osteopathic Association

DATE: February 22, 2018

SUBJECT: House Bill 1437

The American Osteopathic Association (AOA) and the Maryland Association of Osteopathic Physicians (MAOP) are writing regarding HB 1437. This bill allows direct-entry midwives (DEMs) to provide care for women with a history of disorders which could result in a high-risk pregnancy. Further, where complications arise during the pregnancy, the bill only requires transfer to another health care “practitioner,” who may similarly lack the education and training necessary to safely handle a high-risk pregnancy. The AOA and MAOP are concerned that allowing DEMs to care for pregnant women with a history of certain disorders without physician involvement could put the safety of Maryland patients at risk.

The AOA represents 137,000 osteopathic physicians (DOs) and 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. MAOP is a professional medical organization that represents over 1,100 DOs providing patient care in Maryland.

The AOA and MAOP support 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. DEMs are not required to complete any formal medical education, and may not be able to recognize signs of pregnancy complications that exceed the scope of their training. Further, this bill provides no additional education, training, competency demonstration, or professional liability insurance requirements for DEMs.

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.

- **Maryland-licensed physicians** must complete **50 continuing medical education hours every two years.**

This bill allows Maryland-licensed DEMs to complete:

- **A North American Registry of Midwives (NARM) bridge certificate.**
- NARM-certified DEMs *may attend a midwifery program* or school, but it is **not required.**
- **In lieu of formal schooling,** DEMs may **apprentice with another midwife** and document completion of the NARM's Portfolio Evaluation Process (PEP).¹
- The PEP requires completion of **informal** education and attendance at 10 - 20 births as an "observer," an "assistant" and a "primary under supervision" by another midwife.²
- **50 hours of continuing education in the past two years,** to include 14 hours of obstetric emergency skills training and 36 hours of other education relating to pregnancy complications and neonatal care.

This bill:

- **Deletes language requiring DEMs to transfer patients** with a history of complications, including **gestational diabetes, epilepsy and thrombosis.**
- Only requires transfer of patients who **develop complications as prenatal care proceeds.**
- **Only requires transfer** to another "**health care practitioner,**" who may be another non-physician clinician.

Health professionals' scope of practice must be based on their level of training, education, experience and examination. Allowing individuals who may not have completed any formal education to independently care for women throughout pregnancy and delivery, and recognize complications which may be beyond the scope of their training, could place the public health and safety at risk.

The AOA and MAOP appreciate your consideration of our concerns regarding HB 1437.

Should you need any additional information, please feel free to contact Raine Richards, JD, Director, State Government Affairs at r-richards@osteopathic.org or (800) 621-1773, ext. 8199.

Sincerely,



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President, AOA



Brian Kahan, DO
President, MAOP

¹ <http://narm.org/pdffiles/AppForms/PEP-ELInstructions.pdf>.

² <http://narm.org/pdffiles/CIB.pdf>. (p. 7)

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