



March 15, 2010

Centers for Medicare and Medicaid Services  
U.S. Department of Health and Human Services  
P.O. Box 8013  
Baltimore, Maryland 21244-8013

Attention: CMS-0033-P

I am pleased to comment on behalf of the American College of Nurse-Midwives (ACNM) to the proposed rule regarding the Electronic Health Record Incentive Program issued on January 13, 2010, by the Centers for Medicare and Medicaid Services (CMS). ACNM is pleased with the proposed rule and has no recommendations at this time for modifications.

With roots dating to 1929, ACNM is the oldest women's health care organization in the U.S. ACNM is the professional association that represents Certified Nurse-Midwives (CNM) and Certified Midwives (CM) in the United States. ACNM provides research, administers and promotes continuing education programs, establishes clinical practice standards, creates liaisons with state and federal agencies and members of Congress. Our mission is to promote the health and well-being of women and infants within their families and communities through the development and support of the profession of midwifery as practiced by CNMs and CMs. The philosophy inherent in the profession is that every individual has the right to safe, satisfying health care with respect for human dignity and cultural variations.

ACNM is committed to the adoption and usage of certified electronic health record technology and was a supporter of this initiative within the American Recovery and Reinvestment Act (ARRA) (Pub. L. 111-5) as it moved through the Congress and signed into law by President Barack Obama in early 2009. Midwives, practicing as primary care providers throughout the nation, are on the front lines of health care delivery to women in the United States. The resources provided in ARRA and described more fully in this proposed rule, will enable CNMs to access the technologies needed to improve efficiency within the services they deliver.

ACNM has reviewed the definition of "meaningful use" within the proposed regulation and see no problems with it at this time. We believe the clinical quality measures

proposed are appropriate and in line with the current standard of care CNMs and CMs provide today.

As CMS moves forward with this initiative, we suggest that the agency coordinate directly with ACNM to provide information to CNMs and CMs on how and when to acquire electronic health record technologies and information regarding approved vendors. We look forward to working with CMS to provide CNMs and CMs with timely access to the information they need to ensure that the technology they acquire meets the standards set by CMS.

Thank you for your work on this important initiative. Please contact Tina Johnson, CNM, Director of Professional Practice and Health Policy at ACNM, at (240) 485-1840 ([tjohnson@acnm.org](mailto:tjohnson@acnm.org)), or Patrick Cooney, Federal Representative for ACNM, at (202) 347-0034 ([patrick@federalgrp.com](mailto:patrick@federalgrp.com)), with any questions you might have regarding midwives, the services they provide, and populations they serve, as it relates to this initiative.

Sincerely,

Lorrie Kaplan  
Executive Director