



August 1, 2008

Michael D. Maves, MD, MBA, Executive Vice President  
Nancy H. Nielsen, MD, PhD, President  
American Medical Association  
515 N. State Street  
Chicago, IL 60610

Dear Drs. Maves and Nielsen:

I am writing to you as President of the American College of Nurse-Midwives (ACNM), on behalf of the more than 11,000 Certified Nurse-Midwives (CNMs) and Certified Midwives (CMs) in the US. CNMs and CMs play a critical role in our nation's maternity care system, attending more than 11% of all vaginal births. In addition, we conduct more than seven million<sup>1</sup> outpatient visits—90% of which are for primary, preventive care, including gynecological care. Moreover, 70% of the women seen by CNMs and CMs are considered vulnerable by virtue of their age, socioeconomic status, education, ethnicity or location of residence.<sup>2</sup>

We wish to comment on the American Medical Association's (AMA's) recent resolutions 204 "Midwifery Scope of Practice and Licensure" and 205 "Home Deliveries." These resolutions were introduced by the American College of Obstetricians and Gynecologists (ACOG), referred to Reference Committee B and approved on June 17, 2008.

***ACNM strongly rejects Resolution 204's call for greater physician and regulatory oversight of midwifery practice.*** CNMs and CMs are autonomous health care professionals. We practice within a system of care that relies on communication, collaboration and cooperation with all care providers in order to provide the best possible health care to women and childbearing families. In the vast majority of states, CNMs are recognized as licensed independent practitioners. The safety and efficacy of the care we provide has been abundantly documented over decades.

ACNM considers it vital to ensure proper CNM/CM representation on regulatory boards overseeing our practice to ensure appropriate and well-informed decision-making on scope of practice and other issues. An appropriately configured board of midwifery could meet this need. In the attached addenda, we suggest specific policy approaches that will ensure a qualified midwifery workforce practicing within established standards of care and working collaboratively and seamlessly within the health care system.

***ACNM supports a woman's right to choose home birth. We strongly oppose efforts to legislate site-of-birth choices for women and their families—which is exactly what Resolution 205 proposes to do.*** Clinical practice must be guided by research. The scientific evidence strongly supports that planned home

birth under established selection criteria is a safe alternative to hospital birth. In the attached addenda, we summarize this evidence, explore the drivers behind the home birth choice and recommend specific strategies to improve the continuity of care for the small proportion of women and families choosing home birth.

We request that AMA work with ACNM and other stakeholders to prioritize a focus on the larger issues plaguing our nation's maternity care system that are affecting a significant proportion of childbearing families in the US.

Lastly, we have seen that confusion about midwifery credentials often leads to misguided policy directives and therefore have included an addendum with additional information on Certified Nurse-Midwives (CNMs) and Certified Midwives (CMs) and the ACNM. We hope that these clarifications will assist the AMA in separating the issue of birth site from that of appropriate qualifications for professional midwives—a confusion that pervades both resolutions.

Please note that ACNM also previously submitted written comments to AMA in opposition to language in Resolution 214, "Doctor of Nursing Practice," which calls for physician supervision of anyone with a DNP degree. These comments are resubmitted as an attachment to this letter.

Thank you for your attention to these important issues. We look forward to meeting with you at your earliest convenience to begin working together in a positive direction to address these important issues.

No work is greater than the power behind it.

Sincerely,



Eunice K.M. Ernst, CNM, MPH, DSc(Hon)  
President  
American College of Nurse-Midwives

Cc: Dr. Douglas Kirkpatrick, President, American College of Obstetricians and Gynecologists

**List of Attachments**

- Addendum I: About the American College of Nurse-Midwives
- Addendum II: Ensuring a Qualified Midwifery Workforce
- Addendum III: Home Birth is a Rational, Personal Choice
- Addendum IV: Planned Home Birth Using Established Selection Criteria is a Safe Alternative to Hospital Birth
- Addendum V: Disaster Preparedness Planning Must Include Provisions for Birthing in Place
- Addendum VI: Is Home Birth a Significant Problem in the US Maternity Care System?
- Addendum VII: AMA's Call for More Physician Oversight and Regulation of Midwifery is Unwarranted
- Addendum VIII: ACNM's Policy Agenda to Ensure Qualified Professional Midwives

ACNM Issue Brief, "Midwifery Certification in the United States" (January 2008)

ACNM June 2008 letter to AMA re Resolution 214