



July 15, 2009

Dear Members of Congress,

It has come to our attention that members of Congress will be asked to consider an amendment providing for federal recognition under the Social Security Act (SSA) of Certified Professional Midwives (CPMs). On behalf of the American College of Nurse-Midwives (ACNM), I am writing to inform you that ACNM opposes this recognition because individuals holding the CPM credential lack a uniform minimum standard of accredited academic education.

There is no precedent for extending federal recognition under the SSA to a class of health care providers who have not graduated from an accredited educational program or institution. **Until the CPM community has developed a uniform process to ensure that all CPMs have graduated from an accredited education program, Congress should not recognize this class of provider in its entirety.**

Understanding Midwifery Credentials

There are three certifications in midwifery practice in the United States.

- **Certified Nurse-Midwives (CNMs)** recognized under §1861(s)(2)(L) of the Social Security Act since 1988, and licensed with prescriptive authority in all 50 states, CNMs' broad scope of practice includes primary care and gynecologic care to women of all ages as well as care during pregnancy and childbirth in all birth settings. CNMs are required to graduate from an academic program accredited by the Accreditation Commission for Midwifery Education (ACME), which has been recognized by the US Department of Education (USDE) as an accrediting body since 1982. CNMs are certified by the American Midwifery Certification Board (AMCB). **As of January 1, 2011, a graduate degree is required for entry into clinical practice for CNMs.**
- Since 1996, the **Certified Midwife (CM)** credential has enabled individuals without a nursing background to pursue a career in midwifery. Like CNMs, CMs graduate from an ACME-accredited program and are certified by AMCB; they must meet the same core competencies and standards of practice as CNMs, and **as of January 1, 2011, are required to hold a graduate degree for entry into clinical practice.** The American College of Nurse-Midwives is working to gain broader state recognition of CMs as well as federal recognition under the SSA. There are nearly 12,000 combined CNMs and CMs in the US today.
- **CPMs** come from a variety of backgrounds and have a narrower scope of practice and education than CNMs /CMs. In most of the 23 states in which they are licensed, CPM practice is limited to the provision of maternity care services for out-of-hospital births. Two different educational pathways

are available to those seeking certification as a CPM by the North American Registry of Midwives (NARM): (1) graduation from an academic program accredited by the Midwifery Education Accreditation Council (MEAC), or (2) completion of apprentice training which does not have MEAC accreditation. According to CPM leaders, at least half of the estimated 1400 CPMs are apprentice-trained.

Like most certifying bodies, NARM is accredited by the National Organization for Competency Assurance's National Commission for Certifying Agencies. **This accreditation reflects an approved testing process and a psychometrically sound exam. Accreditation of the certifying body, however, is not the same as requiring graduation from a formal accredited educational program prior to taking the certification exam.**

The Role of Educational Accreditation in Quality Assurance

Accreditation is a non-governmental, peer evaluation process which serves to assure the quality of education in the United States. In health care, educational accreditation, professional certification, and state licensure each play an essential complementary role in assuring that health professionals are educated and competent to practice. The some functions of accreditation include:

- Verifying that an institution or program meets established standards;
- Assisting prospective students in identifying acceptable institutions;
- Protecting an institution against harmful internal and external pressure;
- Raising the standards of educational institutions;
- Involving the faculty and staff comprehensively in institutional evaluation and planning; and
- Establishing criteria for professional certification and licensure and for upgrading courses offering such preparation.

By statute, the USDE is required to publish a list of nationally recognized accrediting agencies deemed to be reliable authorities as to the quality of education or training provided by the higher education programs and institutions they accredit.

Midwifery Education in the Global Context

The US should promote the highest standards for the education of health care professionals—not lower standards than those of other countries. In its 2009 document “Global standards for the initial education of professional nurses and midwives,”

(www.who.int/hrh/nursing_midwifery/hrh_global_standards_education.pdf) the World Health Organization (WHO) has recommended standards for nursing and midwifery programs. The document calls for midwives to be educated at an accredited university program that is part of a higher education accredited institution and has criteria that meet accreditation standards for both clinical practice and academic program components.

Similarly, WHO recommends that core midwifery academic faculty be knowledgeable as educators and hold a minimum of a bachelor's degree (preferably a graduate degree). Clinical faculty should include midwives and other health professionals with a university degree and clinical and educational expertise, and midwifery schools validate clinical and educational expertise and competency of faculty and provides faculty with professional development opportunities.

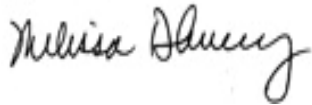
CPM preceptors do not meet these standards. According to NARM, CPM preceptors can be either (1) licensed and certified as a CPM, CNM, or CM; or (2) a midwife without specific certification or licensure who has practiced as a primary attendant without supervision for three years and fifty out-of-hospital births.

In Conclusion

As Congress considers proposals to provide uniform federal recognition of CPMs as health care providers under the Social Security Act, ACNM urges Congress to support federal laws and regulations based on successful completion of a formal accredited education program; national certification in midwifery; state licensure; and regular recertification/continuing education.

ACNM requests that Congress strongly support minimum educational standards in the education of all health care professionals by opposing the federal recognition of CPMs who have not graduated from an accredited formal educational program or institution.

Sincerely,

A handwritten signature in cursive script that reads "Melissa Avery".

Melissa D. Avery, PhD, CNM, FACNM, FAAN
President