

January 2, 2008

To Whom It May Concern:

We are four Certified Nurse Midwives (CNM's) writing to express our concern about the lack of practice guidelines for Certified Professional Midwives (CPM). We are not opposed to CPM's practicing in Virginia. Nor are we opposed to home birth. In fact studies have shown homebirth to be safe for low risk women.

However it has come to our attention that there are CPM's who are advertising and promoting home-birth for women who should clearly be in a hospital setting. These include women with non-vertex presentation, twins and women desiring Vaginal Birth after a Cesarean section (VBAC). Our concern is for these women and the health of their infants, a safe birth with a good outcome.

The Midwives Alliance of North America lists the regulations for all states that have CPM's practicing. Some states even require CPM's to present in writing the advantages and disadvantages of home birth. Most have clear practice guidelines; some require one visit with a CNM or MD. A good number list what type of women are not allowed to be cared for a CPM therefore not a candidate for a home birth, including but not limited to:

- Gestational Diabetes
- Women who are morbidly obese
- Non-vertex presentation
- Twins
- Women desiring VBAC.

The link to these state regulations is <http://www.mana.org/laws.html>

When a CPM transfers a patient to a hospital who they clearly should not have provided care for, it compromises the integrity of our profession as midwives. Consumers are not often aware of the differences between Nurse-Midwives and Professional Midwives. This concern does not even address the risk to the infant and mother during the time it takes to transfer to another facility (i.e. driving to the facility, admission procedures, preparation for delivery). These transfers also usually come as a "drop off" and do not include helpful medical, prenatal, or labor history to provide optimal care.

We urge you to look at adding guidelines to make home-birth safe for all. Any further questions can be addressed to us at the phone numbers listed below with our names and signatures:

Sincerely