

August 5, 2024

Re: Chapter 33 - Midwifery Joint Committee Permanent Rules 21 NCAC 33 .0118 (c)

Dear Ms. Ellis,

Thank you for the opportunity to provide comment on the proposed changes to the Midwifery Joint Committee's Permanent Rules. The National Association of Certified Professional Midwives (NACPM) is the professional organization for Certified Professional Midwives who are the midwifery experts in community birth standards.

NACPM encourages the Committee to remove prohibitions on midwifery practice from the proposed law. Writing healthcare standards into laws creates costly issues in the future as professional standards continue to evolve and change as new evidence in clinical practice becomes available. Instead, it is best practice for statutes to set limitations by directing providers to adhere to standards determined by the provider's professional organization or other comparable official document.

This way, the standards are regularly updated to reflect the best clinical practice using current evidence, allowing providers to provide the highest quality of care. The National Partnership for Women & Families expresses that states should, "Amend unnecessarily restrictive midwifery practice acts to enable full-scope midwifery practice, in line with their full competencies and education as independent providers who collaborate with others according to the health needs of their clients."

In alignment with this stance, it is recommended that section 21 NCAC 33.0118 part (c) be revised, for example, in the following way,

(c) In addition to the requirements in this Rule, a licensed midwife who attends and provides midwifery services for a planned home birth is prohibited from providing service outside the midwife's professional organization's standards of care and practice guidelines.

Please consider this request regarding the effectiveness of these Rules in achieving optimal perinatal health for birthing people in North Carolina and their families.

Sincerely,

Cassandra Jah, PhD, CPM, LM, IBCLC
Executive Director, NACPM