



August 8, 2023

Joint Committee for Administrative Rules (JCAR)

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Illinois Department of Public Health (DPH)

DPH.Rules@illinois.gov

Re: Comments for proposed amendments to the Birth Center Licensing Rules, Second Notice

Dear Joint Committee for Administrative Rules, and Department of Public Health:

The American Association of Birth Centers (AABC) is writing to comment on the proposed amendments to the Birth Center Licensing Rules, Second Notice. AABC is a national organization responsible for the nationally accepted Birth Center Standards for quality care and administration of birth centers. Decades of experience and research in birth center care make up the birth center Standards which are updated and revised by a group of experts as needed when the evidence changes. These Standards are the foundation for national birth center accreditation by the Commission for the Accreditation of Birth Centers (CABC). CABC has developed Indicators to measure a birth center's compliance with the Standards. Below are our comments and recommendations on the proposed Licensing Rule.

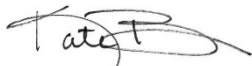
Proposal to exclude birth centers as a site for circumcision. Circumcision has always been performed in outpatient settings, including medical offices, for those parents who choose to postpone the procedure until the newborn is 1-2 weeks old. This option is available for those parents who wish to wait until newborn clotting is more developed. There should be no restriction on circumcision being performed in the birth center as a licensed healthcare facility because this could limit access to care for some populations.

Using a list of specific exclusions from birth center care. AABC recommends that state regulations use language that clinical guidelines are followed that meet "accreditation guidelines and AABC Standards." In this way, when the evidence changes, it is not necessary to go through the process of changing risk criteria in the Regulations. Using a list of specific exclusions can also lead to increasing the risks to patients if criteria in the regulations are not current. The evidence-based accreditation and AABC Standards should be cited by version in the Regulations.

Exclusion from birth center care of those with a previous cesarean. Patients with a previous cesarean have been offered care and birth at licensed birth centers for the past year. To arbitrarily change that provision now would restrict care for those who desire complete pregnancy and birth care in the birth center. This exclusion would severely limit access to care for some of the most vulnerable and underserved populations in your state. The Birth Center Licensing Act of 2021 was driven by concerns over racial disparities in health care, and the black maternal morbidity and mortality crisis. In addition, the closing of several hospitals in Illinois further restricts access, particularly on the south side of Chicago. The CABC accreditation process approves birth centers that provide a trial of labor to those with a previous cesarean birth.

Thank you for allowing us to comment on these proposed revisions to the Birth Center Licensing Rule. We are available to answer any questions you may have about these or other changes in the future. Our hope is that any changes to the Birth Center Licensing Rule preserve high quality evidence-based care that promotes increased access and decreased disparities.

Sincerely,



Kate Bauer
Executive Director, AABC



Jill Alliman, DNP, CNM
Government Affairs Chair, AABC