

American Association of Birth Centers

America's Birth Center Resource



3123 Gottschall Road - Perkiomenville, PA 18074 - Tel: 215-234-8068 - Fax: 215-234-8829 - aabc@birthcenters.org - www.birthcenters.org

OFFICERS

Lesley Rathbun, MSN, CNM, FNP
President

Jennifer Stevens, MSN, CNM
Vice President

Judi Davidson, CDM, CPM
Secretary

Keith Williston, BSW
Treasurer

DIRECTORS

Kenneth Blau, MD

Kiersten Figurski, LM, CPM

Catherine Gordon, MSN, CNM, FNP-BC

Jackie Griggs, MS, CNM, CPM, IBCLC

Jessica Illuzzi, MD, MS

Amy Johnson-Grass, ND, LN, LM, CPM

Mark Shwer, MD

Kenzie Singleton, JD

Fran Schwartz, JD
Alternate Director

EXECUTIVE DIRECTOR

Kate E. Bauer, MBA

March 10, 2014

Federal Trade Commission
Office of Policy Planning, and
Bureau of Competition
600 Pennsylvania Avenue, NW
Washington, D.C. 20580

Re: Comments for Health Care Workshop, Project No. P131207
Examining Health Care Competition

Dear Chairwoman Ramirez, Commissioners, and FTC Staff;

The American Association of Birth Centers (AABC) is pleased to submit the attached comments in connection with the above-referenced workshop, "Examining Health Care Competition." AABC is the national trade association of freestanding birth centers (FSBC), an innovative facility-based health care delivery option typically staffed by Certified Nurse-Midwives (CNM) and/or Certified Professional Midwives (CPM) or other Licensed Midwives (LM). Although the absolute number of FSBCs is still small (265 as of February 2014), that number has increased by 65% since 2004, and demand for birth center and midwife services is on a steady upward trend.

These comments provide information regarding freestanding birth centers in the context of the market for maternity care services in the United States at the present time. The focus of these comments is on barriers to entry, such as restrictive state regulation of midwives and freestanding birth centers; anti-competitive practices of hospitals and physician groups; exclusion of birth centers and midwives (cost-effective high quality providers) from managed care provider panels; and limits on consumer information, access, and choice regarding the full range of maternity care providers.

To provide a picture of the today's maternity care market we have attached or linked copies of recent studies on various aspects of that market. These include:

- The March 2014 National Health Care Statistics data brief on place of birth and other birth-related characteristics;
- The 2013 study "The Cost of Having a Baby in the United States," prepared by Truven Health Analytics® for Childbirth Connection, Catalyst for Payment Reform, and the Center for Healthcare Quality and Payment Reform;
- Reports based on Childbirth Connection's Transforming Maternity Care multi-stakeholder project to improve the delivery of and access to maternity care services;
- Published peer-reviewed studies on outcomes of care in birth center settings;
- Various charts and maps that provide graphic representations of demographic or regulator factors.

Thank you for conducting this important workshop. We hope you will permit Karen S. Fennell, MS, RN, our policy analyst, to make a brief presentation during the proceedings. Ms. Fennell has already pre-registered online. We plan to follow up with more detailed commentary before the April 30 deadline.

Sincerely,

Lesley Rathbun, MSN, CNM, FNP
President
American Association of Birth Centers