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FAMILIES
CENTER

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Mr. Donald S. Clark, Secretary,
Federal Trade Commission
Office of the Secretary
Room H-113 (Annex X)
500 Pennsylvania Avenue NW
Washington, DC 20580

RE: FTC Health Care Workshop, Project No. P131207

Dear Secretary Clark,

I have been watching with interest the recent Federal Trade Commission's "Workshop: Examining Health Care Competition" held on March 20-21 2014.

I am moved to remind you that the freestanding birth center was a case study of Lewin and Associates, Inc. in "Competition Among Health Practitioners: The Influence of the Medical Profession on the Health Manpower Market" completed in 1981 as "Volume II: The Childbearing Center Case Study"

As a certified nurse-midwife, applied anthropologist and the General Director of the then 60+ year old venerable Maternity Center Association which founded the Childbearing Center on NYC's Carnegie Hill in 1975, I was interviewed. The text of my doctoral dissertation, "Barriers and Conflict in Maternity Care Innovation" (Teachers College, Columbia University 1979), a political anthropological analysis of barriers to innovating in the health care delivery system is heavily quoted regarding measures taken by organized medicine to ensure the Center not open, and should that happen, that it would be closed. Neither occurred and today there are well over 200 freestanding birth centers functioning in the country with standards developed by a multidisciplinary team to guide them. One of those centers, the Family Health and Birth Center, (FHBC) established in 2000 under the aegis of the Developing Families Center in the District of Columbia, has proven that the outcomes of low income African American families can be sharply improved with the midwifery model of care being used there (Urban Institute 2013 Health Services Research)

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Community of Hope Family Health and Birth Center

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I hope that the workshop will bring solutions to the problems of serving childbearing families of whatever social, economic and racial origins. The recent *imprimatur* of the American College of Obstetricians and Gynecologists (2/6/2006) which cites "accredited freestanding birth centers ... as a safe setting for birth" should assist that effort. If I might be of any further assistance, I would be happy to comply.

Most Sincerely

Ruth Watson Lubic, CNM, Ed.D, FACNM, FAAN
Founder and President Emerita
Developing Families Center and
Family Health And Birth Center

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