
From: Sarah Collins <sjbrown1@g.coastal.edu>
Sent: Sunday, September 27, 2015 7:57 PM
To: Haley, Nikki
Subject: Standards for Licensing Birthing Centers for Deliveries by Midwives

Dear Governor Haley,

I am writing in regards to the proposed regulations for birth centers published in the South Carolina State Register Document No. 4579, Proposed Amendment of R.61-102, Standards for Licensing Birthing Centers for Deliveries by Midwives.

My name is Sarah Collins and I am the mother of three boys. My two oldest boys were both born in a hospital setting and with each of them I was induced for no medical reason. I also received epidurals with both of them. My hospital births were not traumatic and both boys were born healthy and with no medical issues. With my third son though, I chose to give birth in my own home with a Certified Professional Midwife. My hospital births pale in comparison to my home birth. My prenatal care from the beginning with my CPM was more in depth and personal than any visit I ever had with my OB/GYNs. With my first two boys I was rotated between five doctors in one practice. They wanted me to get to know each of the doctors since who ever was on call the day I went into labor is who would deliver my baby. At each doctor's visit, I felt like a number not a person. I had to constantly remind each doctor of who I was and what was going on with me. And I was lucky to see the doctor for more than 10 minutes on any given visit. If I had a question or issue where I needed to contact the doctor personally, well that was just about impossible. Most of the time I had to leave a message and the call would be returned by a nurse. My prenatal visits with my CPM were personal and it gave me comfort in knowing that the person who I was seeing at EVERY visit would be the person to guide me once I went into labor. With my CPM I had a relationship, a real life personal relationship. I felt like a person to my CPM, not just another client. With my CPM my prenatal visits usually lasted anywhere from 45 minutes to one hour. She did everything they did at a regular doctor visit but then also made sure my nutrition was where it needed to be, made sure I was exercising and made sure I was doing all right mentally with all the changes that my body was going through. I also had my CPM's personal phone number so I could call or even text her if I had ANY questions/concerns/issues and had no issues getting in touch with her when I needed to.

My home birth experience was the most amazing experience of my entire life. It happened almost four months ago and I still feel like I'm on cloud nine. My recovery after giving birth this time around was SO much easier. I honestly didn't even feel like I had a baby. The freedom I felt being in my own home and being able to labor how I wanted to instead of being told that I had to stay in a bed strapped up to fetal monitors was amazing. I also enjoyed being able to breastfeed my baby for as long as I wanted without being rushed because my baby had to be taken to the nursery. With my oldest son, I was only able to be with him for twenty minutes before he was taken to the nursery and they kept him for TWO hours and with my second son he was gone for FOUR hours! That is just not acceptable...a newborn baby should not be whisked away from the mother after only twenty to thirty minutes, it is completely unnatural to take a newborn child away from it's mother so soon after birth.

At this point in time, I'm not sure if my husband and I will have any more children. But should we decide to have more children, I want to know that I have choices. Even though I did not have any of my children in a birthing center, I want to know that I have that option. I want to know that I have other choices besides a hospital to give birth in. I have multiple choices in where I can eat out at, where I can shop at, where I send my children to school so why should it be any different when it comes to giving birth? Having a baby is not some

scary medical event, it is something that my body was created to do and is a natural part of life. If a women is having a low risk pregnancy she should have the option to chose to birth in a birthing center, at home or in the hospital.

I am asking you that the National Professional Standards should become the basis for rules governing the education and practice of Licensed Midwives and guidelines for Birthing Centers in South Carolina. I also ask that you ensure that the guidelines for Licensed Midwives and Birthing Centers in South Carolina are evidenced-based and made for midwives and their clients, not by doctors and/or government bureaucrats. Midwives do not create the guidelines for doctors so doctors should not get to create the guidelines for midwives, it just simply does not make sense. I believe that Midwives should be able to practice their profession based on their own professional standards just as other health care providers do. More specifically regarding Reg. 61-102, I believe that requiring an on call physician is dangerous and will end up delaying emergency transfers to the higher level of care they might need. Midwives are capable of knowing when an emergency transfer is required and making them wait around for a physician to tell them what they already know is a waste of precious time and puts the mother and baby at a greater risk for a poor outcome. There is also no evidence that supports having a contractual agreement with consulting physicians would increase patient safety. If anything, this type of agreement creates a conflict of interest for physicians who are employed by a hospital. Please postpone regulation changes until the pending legislation brings the SC Birth Center Law (Title 44 -Health, CHAPTER 89) up to National Standards.

Please help to move South Carolina forward when it comes to women's rights. Women of South Carolina deserve to have choices when it comes to giving birth not more and more restrictions.

Thank you,
Sarah Collins