



Board of Nursing

Wes Moore, Governor · Aruna Miller, Lt. Governor · Ryan Moran, DrPH, MHSA, Acting Secretary

April 1, 2025

The Honorable Joselyn Pena-Melnyk
Chair, Health and Government Operations Committee
Room 240
House Office Building
Annapolis, MD 21401

RE: SB 854 – Health Occupations - Licensed Direct-Entry Midwives - Revisions

Dear Chair Pena-Melnyk and Committee Members:

The Maryland Board of Nursing (the Board) respectfully submits this letter of opposition for SB 854 Health Occupations - Licensed Direct-Entry Midwives - Revisions. While we support our Licensed Direct-Entry Midwives (LDEMs) and the expertise they have in their practice, we believe that the changes made in this bill are potentially dangerous, interfere with continuity of care, and could place patients at risk.

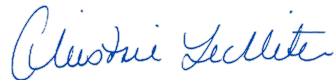
The Board is proud to oversee the practice of Licensed Direct-Entry Midwives and recognizes the important work they do for parents and children during many of the most important times in any family's life. The Board has supported LDEMs as independent practitioners, and recognizes that during low-risk pregnancy labor, delivery, and postpartum periods they can provide excellent care up to any standard. Over this session the Board has worked tirelessly with the sponsor and stakeholders on the various issues the Board had with the bill. The stakeholders were understanding of the Board's concerns for patient safety and continuity of care, and common ground was found on various issues. However, the Board remains adamant that parts of the bill expand LDEM scope of practice beyond their training, and would put parents and children in danger during the birthing process. In particular, the bill as currently written continues to allow LDEMs to care for patients with severe anemia. Given the amount of bleeding expected in a normal pregnancy, severe anemia can be extremely dangerous for both the parent and the baby. With severe anemia, the pregnancy is no longer "low-risk", and is therefore outside the scope of practice for the LDEM, and the Board believes warrants immediate transfer to an appropriate provider with the requisite training to treat these patients. Though there were changes made to the bill in this area, it is not an issue the Board feels it can move on, and must continue its opposition to the bill.

It should be reiterated here that the Board has the utmost trust in our LDEMs to provide care to low-risk patients, but they do not have the clinical expertise to handle high-risk pregnancies independently. The Board knows how important LDEMs are to our state's healthcare workforce. They provide essential care to hundreds of Marylanders every year, and we would be far less capable of providing necessary services if not for their important work. As such, we do support

the extension of their licensure in the bill. They are, however, part of a larger system designed to ensure safe provision of care. This bill exposes LDEMs and their patients to greater risks, and for these reasons we respectfully ask this committee for an unfavorable report on SB 854.

Thank you again for your time. For more information, please contact Ms. Mitzi Fishman, Director of Legislative Affairs, at 410-585-2049 or mitzi.fishman@maryland.gov, or Ms. Rhonda Scott, Executive Director, at 410-585-1953 or rhonda.scott2@maryland.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine Lechliter". The signature is written in a cursive, flowing style.

Christine Lechliter
Board President

The opinion of the Board expressed in this document does not necessarily reflect that of the Department of Health or the Administration.