To the Department of Public Health Hearing regarding the proposed amendments to 105 CMR 130.000 and 105 CMR 140.000:

Dear Council, 10/28/2024

I am Sarah McRell, a resident of Holden, Massachusetts, mother, nurse and certified nurse-midwife that currently works doing homebirth throughout central Massachusetts and also is a nurse-midwife at Seven Sisters Midwifery and Birth Center in Florence, MA.

Throughout my career I have worked in a variety of delivery settings including hospitals with a level III NICU to home. I agree with most amendment changes proposed that are related to birth centers in the 105 CMR. However, I cannot support the mandate 140.903 Equipment and Supplies (A) Standard neonatal warming device. This is not a standard required for birth centers in surrounding states. The only birth center in our state is mandated to have one which was/is a burden for start-up costs and they have never used it. Babies are kept warm by doing skin to skin with their parent(s) as evidence shows this is the best way to warm a baby and vital for bonding. In emergencies, a transwarming device is used. As a provider in a birth center setting, I have never once thought to use the warming device to help warm up a baby. It is an unneeded and financially burdensome piece of equipment.

Also, I would like to address the requirement of birth assistants to have experience in labor and delivery as described in 140.902 (C). This disregards the job training that is specific to birth center care that is more valuable to the environment of the birth center and the clients it serves. Labor and delivery experience does not translate to better birth center nursing. What if nurses have other vital experiences such as ICU? Hospital L&D experience should not be a requirement. Rather, I feel it would be helpful to list the actual skills the birth assistant should have such as: IV skills, NRP, protocols for postpartum hemorrhage management, fetal heart rate monitoring evaluation and interpretation, transfer and discharge home procedures.

Please consider upgrading these amendments. Thank you for your consideration!

Sarah McRell CNM

Embrace Midwifery Care Inc.

3 Brussels St. #202

Worcester, MA 01610