

Agency Response to the Economic Impact Analysis

The Board of Medicine has the following response to the economic impact analysis prepared by the Department of Planning and Budget for 18VAC85-130-10 et seq., Regulations Governing the Practice of Licensed Midwives.

On page 2 of the EIA, it states: *To the extent that individuals who could have safely given birth at home are steered by the information toward a hospital delivery instead, they will incur costs that include the price differential between a home birth and a hospital birth, possible thousands of dollars, and the loss of the comfort that being in their home would likely provide them.*

The EIA does not account for the costs associated with a high-risk pregnancy for which disclosures and options for referral were not appropriately provided. If a woman with a high risk pregnancy is not provided information about risks, the result could potentially be a delivery that has become problematic, necessitating a transfer to a hospital, an emergency delivery and care of a newborn in a NICU. Those costs could range from \$35,000 to \$50,000. If the infant remained in NICU beyond seven days, the costs extend from \$3,500 to \$4,800 for each additional day.

Ultimately, the goal is a viable, healthy infant, regardless of the birth setting. There can be no comparison of costs for that purpose.