



Maryland
Hospital Association

March 2, 2020

To: The Honorable Shane Pendergrass, Chairman
House Health & Government Operations Committee

From: Jennifer Witten, Vice President, Government Affairs
Maryland Hospital Association

Re: Letter of Concern-House Bill 989-Hospitals-Care of Infants After Discharge

Dear Chairman Pendergrass:

On behalf of the Maryland Hospital Association's (MHA) 61 member hospitals and health systems, we appreciate the opportunity to comment on House Bill 989. Maryland's 32 birthing hospitals deliver more than 67,000 babies each year and are committed to a safe delivery, hospital stay, and discharge home.

The state's hospitals agree with the intent of House Bill 989 and the important role that safe sleep practices have on reducing infant mortality. Sadly, approximately 3,500 infants die every year in the United States from sleep-related reasons.ⁱ In 2018, Sudden Infant Death Syndrome accounted for 13% of all infant deaths in Maryland and was a leading cause of death for infants ages 28 days to 11 monthsⁱⁱ.

Since the mid-1990's, the Maryland Department of Health's Perinatal Clinical Advisory Committee has published Perinatal System Standards, which are incorporated into the regulations used by state agencies standardizing obstetrical units and neonatal intensive care units.ⁱⁱⁱ The advisory committee reviews and updates the standards as new research becomes available. Recently, the standards were revised to also incorporate recommendations from the 8th edition of the Guidelines for Perinatal Care— issued by the American Academy of Pediatrics (AAP) and the American College of Obstetricians and Gynecologists (ACOG). The committee is led by multidisciplinary experts including obstetrical providers, birthing hospital representatives, state agencies and representatives from professional organizations such as the AAP, ACOG and the Maryland Medical Society.^{iv}

HB 989 presents concerns because the Perinatal System Standards already require hospitals to “have a written policy to address infant safety issues including safe sleep, abusive head trauma (shaken baby), and car seat safety.”^v Creating additional requisites concerning infant discharge is duplicative and does not provide the flexibility to incorporate changes to standards of care. Given the importance of safe sleep education, there are numerous initiatives underway to promote awareness in Maryland's hospitals throughout the duration of a mother and baby's stay, not just at discharge. The Maryland Patient Safety Center includes safe sleep counseling as a component of the Perinatal Neonatal Quality Collaborative, a state-sponsored quality improvement program which all of the birthing hospitals participated.^{vi} Hospitals were provided

a tool to audit their efforts to promote a safe sleep culture. In addition, Baltimore City hospitals work closely with the B'More for Healthy Babies to educate and promote safe sleep practices sharing a video with parents to demonstrate safe sleep practices. These activities have also included nurses modeling safe sleep in nurseries, which is a practice recommended by the Centers for Disease Control and Prevention and the AAP.^{vii}

Maryland's hospitals acknowledge the importance of, and actively participate in, safe sleep education for new moms and families prior to each baby's discharge. However, we urge the committee to reconsider a statutory approach given the existence of The Perinatal Standards and the extensive ongoing activities focused on promoting safe sleep in our communities.

For more information, please contact:
Jennifer Witten
Jwitten@mhaonline.org

ⁱ Centers for Disease Control & Prevention (January, 2018). *CDC Vital Signs: Safe Sleep for Babies*
<https://www.cdc.gov/vitalsigns/pdf/2018-01-vitalsigns.pdf>

ⁱⁱ Maryland Department of Health. (October, 2019). *Maryland Vital Statistics: Infant Mortality in Maryland, 2018*.
https://health.maryland.gov/vsa/Documents/Infant_Mortality_Report_2018.pdf

ⁱⁱⁱ Maryland Department of Health. (April, 2019). *Maryland Perinatal System Standards*.
https://phpa.health.maryland.gov/mch/Pages/perinatal_standards.aspx

^{iv} Perinatal Clinical Advisory Committee (April, 2019). *The Maryland Perinatal System Standards*.
https://phpa.health.maryland.gov/mch/Documents/perinatal_newsletters/Maryland%20Perinatal%20System%20Standards_Revised%20April%202019_FINAL.pdf

^v Perinatal Clinical Advisory Committee (April, 2019). *The Maryland Perinatal System Standards*. Pg. 30
https://phpa.health.maryland.gov/mch/Documents/perinatal_newsletters/Maryland%20Perinatal%20System%20Standards_Revised%20April%202019_FINAL.pdf

^{vi} Maryland Patient Safety Center. (n.d.). *Perinatal Neonatal Quality Collaborative*.
<https://www.marylandpatientsafety.org/perinatalcollaborative.aspx>

^{vii} American Academy of Pediatrics. (November, 2016). *SIDS and Other Sleep-Related Infant Deaths: Updated 2016 Recommendations for a Safe Infant Sleeping Environment*
<https://pediatrics.aappublications.org/content/138/5/e20162938>