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Craig Cellini
Illinois Department of Financial and Professional Regulation (IDFPR)
320 W. Washington St., 2nd Floor Springfield, IL 62786
P: 217/785- 0813 F: 217/557-4451

12/16/2021

Re: DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION Proposed amendments to Administrative Procedures for General Professional Regulation Under the Administrative Code (68 IAC 1130; 45 Ill Reg 13807) to implement PA 102-4, which requires certain holders of health care licenses to complete a course on “implicit bias awareness” as part of their continuing education prior to each license renewal, effective 01/01/22

Dear Mr. Cellini:

The HRSA-funded Innovations to ImPROve Maternal OuTcomEs in Illinois (I PROMOTE-IL) project at the University of Illinois at Chicago is charged with addressing disparities in maternal health and improving maternal health outcomes, specifically the prevention and reduction of inequities in maternal mortality and severe maternal morbidity. Through this project, the Illinois Maternal Health Task Force was assembled to advise in the creation of the Illinois Maternal Health Strategic Plan to improve maternal health.¹ An identified strategic priority area is root/structural causes of health inequity, which includes supporting efforts to address implicit bias in health care.

With regards to maternal health outcomes, implicit bias has been shown to contribute to racial disparities in maternal morbidity and mortality.² Thus, we feel that a critical component of achieving maternal health equity and reducing racial disparities is the implementation of mandatory implicit bias training for all health care providers providing care to pregnant and postpartum persons. We applaud the legislature for passing HB158, which includes amendments to Administrative Procedures for General Professional Regulation Under the Administrative Code (68 IAC 1130; 45 Ill Reg 13807) to require certain holders of health care licenses to complete a course in implicit bias awareness as part of their continuing education. We also applaud IDFPR for working as quickly as possible to draft implementation rules.

¹ <https://ipromoteil.org/strategic-plan/>

² Saluja, B., & Bryant, Z. (2021). How implicit bias contributes to racial disparities in maternal morbidity and mortality in the United States. *Journal of Women's Health, 30*(2), 270-273.



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We respectfully suggest that the following modifications be made to the drafted rules as listed in Section 1130.500 Implicit Bias Awareness Training of the 2021 Illinois Register *Rules of Government Agencies*, Volume 45, Issue 45, November 5, 2021, Pages 13,803-14,060. The letters below correspond to identified subsections of the drafted rules.

- a) No comments
- b) No comments
- c) Modification: Addition of “state health quality improvement collaboratives, for employees or associates of its participating organizations” to the list of persons or entities allowed to provide implicit bias awareness training courses.
 - Rationale: The Illinois Perinatal Quality Collaborative launched the statewide Birth Equity Initiative in 2021, which includes resources and trainings for providers on implicit bias and respectful care.³ These resources include: Dignity in Pregnancy and Childbirth e-modules through Diversity Science, which were developed to meet implicit bias training requirements for hospitals and health care providers in California.⁴ Currently 86 hospitals, over 80% of Illinois birthing hospitals are engaged in this work, implementing implicit bias education with all obstetric health care providers, nurses and staff so it would be efficient to have these trainings count towards the implicit bias training requirement.
- d) No comments
- e) Modification: Addition of “recognizing and acknowledging personal implicit bias” as a minimum required topic to the implicit bias training course.
 - Rationale: Many healthcare providers do not recognize their personal implicit biases or how these impacts patient care. For example, a study conducted among members of the Society for Maternal-Fetal Medicine, found that “only 29% believed their personal biases affect how they care for patients.”⁵ Self-reflection on personal biases is listed as a key strategy to mitigate unconscious bias⁶ and should be included in the administrative rules as a required topic.

³ <https://ilpqc.org/birthequity/>

⁴ <https://www.diversityscience.org/ilpqc-new/>

⁵ Jain, J., & Moroz, L. (2017, August). Strategies to reduce disparities in maternal morbidity and mortality: patient and provider education. In *Seminars in perinatology* (Vol. 41, No. 5, pp. 323-328). WB Saunders.

⁶ Marcelin, J. R., Siraj, D. S., Victor, R., Kotadia, S., & Maldonado, Y. A. (2019). The impact of unconscious bias in healthcare: how to recognize and mitigate it. *The Journal of infectious diseases*, 220(Supplement_2), S62-S73.



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As there are not many available trainings specifically on “implicit bias,” we suggest broadening training options to include topics such as respectful care and the history of racism in the United States and the medical system in counting towards this requirement. We provide the University of Pittsburgh’s free asynchronous online course entitled “Anti-Black Racism: History, Ideology, and Resistance” as an example.⁷ Topics covered in this course include critical race theory, health disparities, and racial capitalism/disinvestment in Black communities.

- f) Modification: Addition that the course can be presented in a classroom setting, through a webinar or online “either in a synchronous or asynchronous format.”
 - Rationale: Current language is not clear about mode of course delivery; this modification provides additional flexibility to health care providers in identifying course options which meet the implicit bias training requirement.
- g) No comments
- h) No comments

On behalf of the I PROMOTE-IL project and the Illinois Maternal Health Task Force, thank you for your consideration of these comments.

Please contact me by email at sgeller@uic.edu or by phone at (312) 636-2194 if you have questions or need clarifications.

Sincerely,

Dr. Stacie Geller

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⁷ <https://www.provost.pitt.edu/anti-black-racism-history-ideology-and-resistance-final-course-syllabus>



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With Support From:

- Stephanie Altman, Shriver Center on Poverty Law
- Vickie Smith, Illinois Coalition Against Domestic Violence
- Ann Borders and Patti Lee King, Illinois Perinatal Quality Collaborative
- Carie Bires, Start Early
- Rachel Ruttenberg and Kelsie Landers, Heartland Alliance
- Tamela Milan-Alexander, Community Member
- Virginia Julion, Community Member
- David Faich, Community Member
- Glendean Burton, Community Member
- Cecelia Smith, Community Member



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