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Pennsylvania MEDICAL SOCIETY®

February 17, 2009

The Honorable Arthur Coccodrilli, Chairman
Independent Regulatory Review Commission
14th Floor, Harrisstown 2, 333 Market Street
Harrisburg, PA 17101

**Re: Final Regulation
State Board of Medicine
16A-4926: Nurse Midwife Prescriptive Authority**

Dear Chairman Coccodrilli:

I am writing as President of the Pennsylvania Medical Society to support approval by the Independent Regulatory Review Commission of the above captioned final regulations regarding Nurse Midwife Prescriptive Authority. The Medical Society was a participant in the stakeholder process undertaken by the Board of Medicine that led to the promulgation of these final form regulations. We believe the regulations reflect the intent of the statute and the discussions with all interested parties that took place during the drafting process. Approval will permit nurse midwives with required pharmacology training and working in collaboration with a physician to prescribe medications for their patients.

Following submission of these regulations to IRRC and the legislative oversight committees, IRRC received several letters objecting to the use of the term "nurse midwife." The Board, in its response to comments, has accurately described the discussions and rationale that resulted in the use of the term. Subsequently, the Board has begun discussions regarding how to regulate non-nurse midwives. A Board workgroup has been charged with developing a legislative and regulatory approach to the issue, which may result in the need to revisit these regulations at some point in time, but should not delay the implementation of the regulations currently before IRRC.

On behalf of the Pennsylvania Medical Society, I appreciate the opportunity to comment on the Nurse Midwife Prescriptive Authority regulations and urge approval by IRRC.

Sincerely,

Daniel J. Glunk, MD
President

Robert M. Tomlinson, Chair, Senate Consumer Protection and Professional Licensure
Committee

Michael McGeehan, Chair, House Professional Licensure Committee
Sabina Howell, Board Counsel, State Board of Medicine
Ollice Bates, MD, Chair, State Board of Medicine

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