

# 2656

December 16, 2008

Ms. Kim Kaufman  
Executive Director  
Independent Regulatory Review Commission  
333 Market Street, 14<sup>th</sup> Floor  
Harrisburg, PA 17101

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Kaufman:

I am writing as a representative of the Committee to Advance Midwifery Practice (CAMP) to support Vivian Lowenstein, President of the Pennsylvania Association of Licensed Midwives (PALM), in her request that the IRRC review Regulation 16A-4926 and in her recommendation that there is title clarity for the current and amended midwifery regulation by keeping the original term "midwife" and not changing to the exclusive and limited "nurse-midwife." By keeping the original term "midwife," the Commonwealth of Pennsylvania will preserve the possibility of extending prescriptive privilege to Certified Midwives (CMs) when the laws change to regulate CM practice, as we hope will happen in the near future.

CAMP's mission is to expand the Certified Midwife credential to each of the 50 States. The American College of Nurse Midwives (ACNM) accredits CMs with a degree equivalent to that of Certified Nurse Midwives (CNMs). CMs come from a health science background separate from nursing, yet attend classes alongside CNM candidates. They take the same courses in the same programs accredited by the ACNM and sit for the same accreditation exam, administered by the American Midwifery Certification Board (AMCB), formerly known as the ACNM Credentialing Council (ACC).

Our goal is to continue to expand the CM credential, so that we may legally practice in every state. CMs are currently licensed in New York, New Jersey, and Rhode Island to provide full-scope midwifery care as CNMs do. We hope to soon be legally regulated to practice in Pennsylvania with full scope of practice. We have been in close contact with Ms. Lowenstein and PALM and are thrilled that the Pennsylvania licensed midwives now have prescriptive authority, as do CNMs in every other state and CMs in some states.

The ACNM established the CM credential with the intent of increasing access to midwifery care for women across the country, and has ensured that CMs and CNMs are equally qualified to prescribe medications for their patients, requiring the same pharmacology training for CNM and CM candidates.

We support Ms. Lowenstein's request that the IRRC review the final form of the Nurse-Midwife Prescriptive Authority (Regulation 16A-4926) with the recommendation of the use of the term "midwife" for consistent title clarity with our national profession organization, the ACNM.

Sincerely,

Laura Sheperis, CM, MSM  
Committee for the Advancement of Midwifery Practice

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**From:** Kaufman, Kim  
**Sent:** Tuesday, December 16, 2008 9:48 AM  
**To:** Gelnett, Wanda B.  
**Cc:** Smith, James M.; Wilmarth, Fiona E.  
**Subject:** FW: Comments regarding regulation 16A-4926 Nurse-Midwife Prescriptive Authority  
**Attachments:** Nurse Midwife Prescriptive Authority.doc

FYI comment.

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**From:** Laura Sheperis [mailto:lsheperis@gmail.com]  
**Sent:** Tuesday, December 16, 2008 9:44 AM  
**To:** Kaufman, Kim  
**Cc:** Vivian Lowenstein  
**Subject:** Comments regarding regulation 16A-4926 Nurse-Midwife Prescriptive Authority

Dear Ms. Kaufman,

Please find attached a letter with comments regarding regulation 16A-4926 Nurse-Midwife Prescriptive Authority for your review.

Sincerely,  
Laura Sheperis, CM, MS  
Certified Midwife