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December 26, 2007

Ms. Sabina I. Howell, Board Counsel
P. O. Box 2649
Harrisburg, PA 17105-2649

Dear Ms. Howell:

I am writing to comment on the proposed rulemaking for the State Board of Medicine [49 PA Code Chs. 16 and 18] relating to Nurse Midwife Prescriptive Authority, Published 15 Dec.

I am currently a certified nurse-midwife licensed in Pennsylvania.

In § 18.1, the definition of a "midwife colleague" is somewhat unclear. Do "midwife colleagues" have to maintain collaborative agreements with the same physician? It would seem intuitive that in order to substitute for a given midwife, the "colleague" should have a collaborative agreement with the same physician.

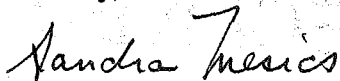
In § 18.5 (g): "The collaborative agreement ... shall be submitted to the Board for review." This is somewhat ambiguous. Will the board send a follow-up "approval" or "disapproval" of the collaborative agreement? I am concerned about the volume of these agreements, and the Board's turnaround time on approvals. Could this be changed to require that the collaborative agreement be filed with the Board? In this event, the Board can randomly review collaborative agreements for compliance.

§ 18.6c "Inappropriate prescribing." I believe the first sentence does not make sense and should be deleted. What is "inappropriate prescribing?" Who determines what is inappropriate?

§ 18.9 a-c. I believe paragraph (c) should be added to the end of paragraph (a). The way it reads now, the midwife could face disciplinary action against her (his) license if the collaborating physician fails to notify the board of a change or termination of the collaborative agreement.

I wish to thank you for the opportunity to comment on this proposed rulemaking.

Sincerely,



Sandra Mesics, RN, MSN, CNM
Certified Nurse-Midwife

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