

Midwives



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of Delaware County

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Barclay Square Shopping Center
1560 Garrett Road
Upper Darby, Pennsylvania 19082
(610) 284-3300

INDEPENDENT REGULATORY
REVIEW COMMISSION

#2657p

January 5, 2008

Ms. Fiona Wilmarth, Director of Regulatory Review
Independent Regulatory Review Commission
333 Market Street
14th Floor
Harrisburg, PA 17101

Dear Ms Wilmarth,

The Midwives of Delaware County have reviewed the proposed Prescriptive Authority Regulations and suggest the following changes:

1. The definition of midwife should not be changed.
2. The collaborative agreement should not have to be submitted to the Board for review.
3. The Master's degree requirement should only apply to midwives with prescriptive authority.
3. Make sure that collaborative physician is both MD and DO.

Yours,

Rebecca Choitz CNM

Sarah Robinson CNM

Bernadette Lloyd-Sobolow CNM

Linsey Will CNM

Moon Smith CNM

Amy Nathans CNM

An expert team
in pregnancy, birthing
and
well woman health care.