

American Association of Birth Centers

America's Birth Center Resource



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

Dear Ms. Wilmarth,

On behalf of the American Association of Birth Centers I am writing to comment on the proposed regulations for prescriptive privileges for certified nurse-midwives in the Commonwealth of Pennsylvania.

I urge you to ensure that the requirements are limited to that needed for certification for prescriptive privileges for midwives who are licensed under existing regulations and in no way conflict with those regulations for practice.

Some examples of where change is recommended are:

- ✓ In section 18.5 (g) the collaborative agreement should not have been submitted to the Board for review. The CNM collaboration with physicians is already addressed in their regulations for licensure and this would create an unnecessary burden for the nurse-midwives and physicians.
- ✓ The Master's Degree requirement should be moved to Section 18.6A to reflect that a Master's Degree is only required for prescriptive authority and not for midwifery practice.
- ✓ The definition of a midwife should revert to the original definition in the current midwifery regulations.

Thank you for the opportunity to comment on these regulations. We are pleased that Pennsylvania has extended prescriptive authority to nurse-midwives.

Sincerely,

Kate E Bauer, MBA
Executive Director



formerly the National Association of Childbearing Centers (NACC)

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