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THE MIDWIFE CENTER
FOR BIRTH & WOMEN'S HEALTH

January 9, 2008

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

INDEPENDENT REGULATORY
REVIEW COMMISSION

Dear Ms. Wilmarth,

I am writing to comment on the proposed regulations for prescriptive authority for certified nurse-midwives. I have been the executive director of The Midwife Center for Birth & Women's Health for six years, previously serving on the founding board of the new nonprofit Midwife Center for two years, after it reincorporated in 2000. As a nonprofit birth center, we have partnered with the local funding community to improve access to high quality care for women and families in the region through outreach efforts and expanded services to underserved communities.

We have met with many of our local state representatives over the last couple of years to let them know about our practice and how it contributes to better health outcomes for women and infants in our region. We were delighted that Pennsylvania state legislators voted overwhelmingly to support prescriptive authority for certified nurse-midwives as part of HB1255 passed last summer.

We are very concerned, however, about some of the language in the proposed regulations, including the following:

- We do not understand why the definition of a midwife has been changed, and ask that the definition in the current regulations be used. Certified nurse-midwives are independent practitioners in Pennsylvania, who do not require supervision by a physician. HB1255 is supposed to support nurse-midwives practicing to the fullest extent of their education and training, not to limit it.
- Item 18.5(g) requires certified nurse-midwife (CNM) collaborative agreements be submitted to the board for review. We support the current standard of CNM collaborative agreements being reviewed at annual site visits from the Department of Health, and available upon request.

We also request that the \$50 charge per collaborative agreement be removed from the proposed regulations. Each of our five CNMs has about fifteen collaborative agreements, which would cost The Midwife Center about \$2500. This would be a tremendous financial burden on our nonprofit birth center.

Thank you for considering these comments. If you have any questions, please feel free to contact me at 412-321-6884.

Sincerely,

Christine Haas, MA
Executive Director

P E R S O N A L I Z I N G W O M E N ' S H E A L T H C A R E

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