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

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Howell,

I am writing regarding Act 50 which would give prescriptive authority to certified midwives in Pennsylvania. I am a nurse-midwife; I have practiced in Philadelphia since 1988 in a variety of setting and practice models. After 13 years at Pennsylvania Hospital, for the last one and a half years I have worked for Greater Philadelphia Health Action providing antenatal, family planning and gynecological care to healthy women at several of their neighborhood sites. We have collaborative agreements with several Ob-Gyns depending on the site.

I urge you to follow the intent of Act 50, and change the regulations to reflect the fact that CNMs do not just provide prenatal and delivery care. Furthermore, requiring our collaborative agreements to be submitted to the Medical Board for review is excessively time-consuming, may be prohibitively expensive for midwives and may discourage physicians from entering into a collaborative agreement. This is the opposite of what was intended by Act 50.

Finally, in cases of inappropriate prescribing, I urge you to change the language so that the midwife, or her colleague, notify the patient. Requiring the collaborative physician to do this will certainly result in a delay in notifying the patient, quite the opposite intent of regulations intended to protect the health of women.

Respectfully submitted,



Katherine Winkler, CNM

Cc:

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Fiona Witmarth, Director Regulatory Review  
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