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## Lebanon Valley Midwifery and Women's Wellness

A birth and women's wellness center with licensed, certified nurse-midwifery care

*Serving Lebanon County, western Berks and nearby areas*

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January 13, 2008

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

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms. Wilmarth,

I am writing to you regarding the Board of Medicine's proposed regulations published in the Pennsylvania Bulletin (12/14/07).

I am a licensed and certified nurse-midwife, the owner of Lebanon Valley Midwifery and Women's Wellness (LVMWW), the first and still only licensed midwifery practice to directly serve Lebanon County, as well as western Berks and nearby areas. LVMWW provides full scope midwifery care: gynecological including family planning, childbearing, and newborn care.

As the Vital Statistics figures show, Lebanon County residents have been and are increasingly seeking midwifery care. Indeed, many are already traveling to adjacent counties for midwifery care. LVMWW particularly serves uninsured women and many who have transportation difficulties. These women seek unlicensed care if no licensed care is available.

Obtaining collaborative physician services has been very difficult; the lack of prescriptive privileges has contributed to this. With the passage of HB 1255, we anticipated the removal of this part of the barrier. Unfortunately, the proposed regulations will create more not fewer barriers to the choices Pennsylvania women have.

While I appreciate that many of the proposed regulations do follow the legislative language, a number go beyond. I ask you to refer to the recommendations and rationales in the table in the letter from Vivian Lowenstein of the Pennsylvania Association of Licensed Midwives (PALM) regarding the changes I believe are important to the proposed regulations. In addition, LVMWW is a small practice at this time and is very concerned about the financial concerns raised by Katy Dawley of the Midwifery Institute.

I, and the staff of LVMWW, are committed to providing safe midwifery care to the women we serve. We hope that you will follow the recommendations cited above made so that the women may have access to this care. Thank you very much for your time.

Sincerely,

*Susan Farrell, CNM*

Susan Farrell, C.N.M.