

January 11, 2008

Sabina I. Howell, Board Counsel  
P.O. Box 2649  
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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Re: P.L. 324, No. 50, Act 50.

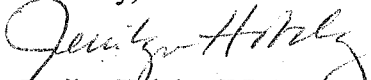
Dear Ms. Howell:

I am writing this letter in response to the proposed regulations by the State Board of Medicine regarding implementation of the act of July 2007, (P.L.324, and No.50) (Act 50) giving midwives prescriptive authority. I applaud the work that has been accomplished to achieve this long overdue and much needed addition of prescriptive authority for the midwives of Pennsylvania. However, there are a few concerns that must be addressed before the regulations are finalized to be in concert with the statute for midwives. I would appreciate your attention to the following suggested corrections for these regulations.

The definition of a midwife is not the same as the original definition in the current regulations and should continue to remain the same as there is no change in the definition of a midwife related to prescriptive privileges. The definition of a midwife "colleague" should be consistent with 18.6 as the colleague must be a practice partner or collaborating physician and not a "substitute". There is no need to require a collaborative agreement to be submitted to the Board for review (18.5.g.) as these are standard practice documents, therefore this item should be deleted from these regulations. The master's degree is only required for prescriptive authority and not for midwifery practice, and therefore should be moved to 18.6.A. The initial sentence regarding inappropriate prescribing in 18.6.c. should also be deleted. Finally, all of 18.9.a.b.c. should be deleted and instead replaced with a sentence such as: "A midwife with prescriptive authority show cannot fulfill the requirements for such prescriptive authority shall cease to prescribe."

Thank you for your time and attention to this matter. These suggested changes are critical to the quality and consistency of the proposed regulation of prescriptive authority for midwives in PA. As the last state in the U.S. to achieve prescriptive authority for midwives, I know that you will want to ensure that this legislation is accurate and will stand the test of time. Again, I thank you for the effort involved in achieving the goal of prescriptive authority for midwives in Pennsylvania and for serving the public safety and health of those in this state who will benefit from this important legislative effort.

Sincerely,



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cc:

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