



Maternity Care Coalition

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INDEPENDENT REGULATORY
REVIEW COMMISSION

January 11, 2008

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

Dear Ms. Howell:

The Maternity Care Coalition (MCC) would like to make the following comments on the regulations proposed by the Board of Medicine published in the Pennsylvania Bulletin on Saturday, December 15, 2007 regarding implementation of the Act of July 2007, (P.L.324, No.50) (Act 50) giving midwives prescriptive authority.

Through outreach, health education, and family support, Maternity Care Coalition works to improve maternal and child health throughout the Greater Philadelphia Area. We are a community based health promotion and advocacy program serving over 3,000 families each year in low-income communities in Philadelphia, Delaware, and Montgomery Counties.

As a community based organization, we bring the perspective of the consumer to our concerns about access to prenatal, birthing, and postpartum care. We have published several reports about the status of childbirth and maternity services and have found a critical need for the supply of childbirth professionals. (Full reports are available on our website.) Therefore, we support efforts to ensure that midwives are recognized as childbirth professionals whose scope of practice in Pennsylvania will recognize their full education and training.

Based on our recent research outlining the dearth of care and the need to access quality care, we offer the following comments on the proposed regulations:

Definition of Midwife:

Section 18.1

This definition of a midwife seems to restrict the scope of practice, rather than fully embrace their training and needed role in the community. Rather than restrict care to only pregnant women, the definition needs to recognize that midwives play a role in well-woman gynecology, family planning and postpartum care. We suggest returning to the original definition of a midwife in House Bill 1255 which states a midwife is a person licensed to practice midwifery.

*Strengthening families,
one baby at a time*

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Section 18.6

The legislation (HB 1255) specifies that only midwives with Master's degrees can prescribe. The regulations, as written in this section, can be misconstrued to imply that only midwives with Master's degrees may practice. There are qualified midwives, licensed in the Commonwealth, who do not have Master's degrees. The legislation did not intend to prevent them from practicing. The current structure could be interpreted as implying that both prescriptive authority and a Master's degree are a requirement of practice.

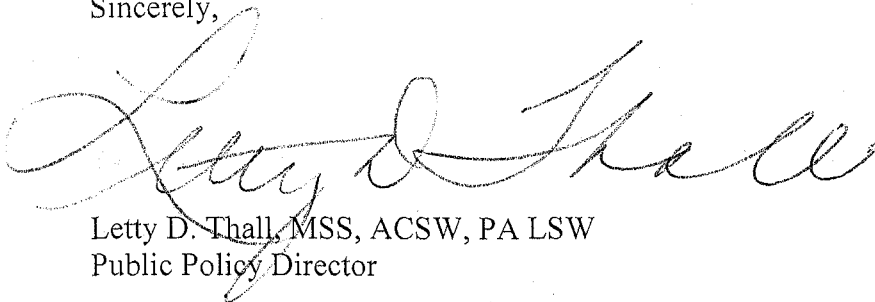
Collaborative Agreements:

Section 18.5

Since 1987, midwives have practiced with collaborative agreements that are revised as needed to reflect changes in the practice. The Board proposal to add subsection (g) to require review of the collaborative agreement by the Board seems like an additional paper work step that will further deter childbirth professionals from practicing in the Commonwealth and deny women access to care. There is no reason to require approvals and filing procedures when "Immediate access to agreements" is stated in other sections including subsection (h).

Maternity Care Coalition is a private nonprofit organization with the mission to improve maternal and child health and well being through the collaborative efforts of individuals, families, providers and communities. The agency achieves its mission through outreach in high-risk neighborhoods and advocacy at the local, state, and national levels. We use our knowledge and front line experience to bring the voices of low-income pregnant and parenting women and teens to the attention of policy makers at the local, state and national levels. We would be happy to supply any additional information that the State Board of Medicine might need. Please do not hesitate to contact me if you need additional information

Sincerely,

A handwritten signature in cursive script that reads "Letty D. Hall". The signature is written in black ink and is positioned above the typed name and title.

Letty D. Hall, MSS, ACSW, PA LSW
Public Policy Director