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INDEPENDENT REGULATORY
REVIEW COMMISSION

January 5, 2008

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

Dear Ms. Howell,

The Midwives of Delaware County have reviewed the proposed Prescriptive Authority Regulations and suggest the following changes:

1. The definition of midwife should not be changed.
2. The collaborative agreement should not have to be submitted to the Board for review.
3. The Master's degree requirement should only apply to midwives with prescriptive authority.
3. Make sure that collaborative physician is both MD and DO.

Yours,
Rebecca Choitz CNM
Sarah Robinson CNM
Bernadette Lloyd-Sobolow CNM
Linsey Will CNM
Moon Smith CNM
Amy Nathans CNM

An expert team
in pregnancy, birthing
and
well woman health care.