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INDEPENDENT REGULATORY  
REVIEW COMMISSION

January 13, 2008

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Sabina I. Howell  
Board Counsel  
P.O. Box 2649  
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Dear Ms. Howell,

I am a practicing nurse-midwife and have been for twenty-seven years, the last twenty-five serving the people of Pennsylvania. I am writing to thank you for the hard work you are doing on the prescriptive privilege regulations for nurse-midwives and to strongly encourage you to implement the changes noted below in the recently published regulations. These changes will make the regulations more accurately reflect the intent of the law by allowing the efficient and safe usage of this privilege in serving the women of Pennsylvania.

Specifically, the changes fall in two categories:

1)definition: a)the definition in our current regulations should not be changed in these new regulations, b)the "midwife colleague" should not be a substitute but rather a practice partner or collaborating physician, and c)the Master's degree requirement needs to be clearly stated to apply only to prescriptive privilege not to midwifery practice in general; and  
2)practicality: this issue revolves around the ability to practice and allow the law to have that intent: as presently written, requiring all collaborative agreements to be reviewed by the Board and requiring the collaborating physician to be involved in notification of the patient in case of prescriptive error places undue and unnecessary burdens on all concerned. The end result of this impracticality is to make it more difficult to provide in a timely fashion the care the women of Pennsylvania and their babies need. The impractical sections involved are 18.6c and 18.9 a, b, and c. Section

18.9d stated thusly would suffice: "A midwife with RX authority who cannot fulfill the requirements for Rx authority shall cease to prescribe."

Thank you again for your diligence in this important matter. I would welcome any comment or question you would like to make. I wish you a very Happy New Year.

Sincerely yours,



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CNM Coordinator,  
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