



Midwifery Graduate Program

Women's Health Care Studies

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Sabina I. Howell, Counsel
State Board of Medicine
Bureau of Professional and Occupational Affairs
Commonwealth of Pennsylvania
P.O. Box 2649
Harrisburg, PA 17105-2649

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January 10, 2008

Dear Ms. Howell:

This past month I had the pleasure of presenting to the members of the State Board of Medicine an overview of the state of midwifery in Pennsylvania, particularly as it applies to those individuals who are trained as Certified Professional Midwives (CPM's) or who are self-taught and label themselves as "midwives." I was impressed at the attention given to this topic by the Board members, and at the stated goals of those present to be exploring this matter as a way of holding true to the Pennsylvania's Bureau of Professional and Occupational Affairs' mission to "protect the health, safety and welfare of the public."

In that same vein, I would like to comment on the proposed regulations put forth by the Board of Medicine to implement the recently passed legislation (P.L. 324, No. 50) (Act 50) regarding prescriptive authority for the Commonwealth's Nurse-Midwives. As you are aware this legislation was passed as a part of Governor Rendell's initiative to offer quality, safe health care to *all* Pennsylvanians, including women and children. Clearly, one longstanding barrier to accomplishing this goal was the lack of ability of nurse-midwives to write prescriptions for clients with who we offered care. Indeed, Pennsylvania had been the only state in the United States in which midwives could not write prescriptions. P.L. 324, No. 50 finally remedied that situation, thus allowing midwives to offer our clients the full scope of care as it is needed.

As with all legislation, regulations must first be written that clarify and guide the enactment of the law as it was intended. Unfortunately, due to several oversights or attempts to "legislate" the legislation, the recently published proposed regulations released by the Board of Medicine seem to deviate somewhat from the intention or spirit of (P.L. 324, No. 50) (Act 50). I am aware that comments you have received from other citizens of the Commonwealth, including Dana B. Perlman, CNM, MSN and Julie E. Cristol, CNM, MSN, Co-Chairs of the southeastern Pennsylvania chapter of the American College of Nurse-Midwives (ACNM, Region II, Chapter 4), and Vivian Lowenstein, CNM, MSN, President, Pennsylvania Association of Licensed Midwives (PALM), have offered detailed changes or corrections to the proposed regulations. Thus, I will not repeat these specifics here, but am writing to state that I support wholeheartedly these suggested changes and am confident that the Board members will recognize their importance to assuring the welfare of the women for who midwives offer care.

Thank you very much for your attention to this matter.

Sincerely,

William F. McCool, CNM, PhD
Director, Midwifery Graduate Program
University of Pennsylvania School of Nursing

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