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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Sabrina I. Howell, Esq., Board Counsel  
State Board of Medicine  
P.O. Box 2649  
Harrisburg, PA 17105

**Re: State Board of Medicine's proposed regulations  
Nurse-midwives' prescriptive authority**

The Pennsylvania State Nurses Association (PSNA) appreciates the opportunity to respond to the State Board of Medicine's proposed regulations in regard to the implementation of Act 50 of 2007 (Prescriptive authority for nurse-midwives.)

PSNA believes that HB 1255 was not intended to become a vessel used to change the definition of "practice of midwifery" [18.1] or to further restrict the overall practice of certified nurse-midwives (CNMs) by mandating that collaborative agreements be submitted to the Board [18.5(g)]. These changes would have a negative impact on access to care, which ironically was the reason that HB 1255 was introduced in the first place.

These regulations must adhere to the original intent of HB 1255—that prescriptive authority be given to CNMs with the appropriate qualifications. PSNA feels that the regulations must focus on giving prescriptive authority to CNMs with the appropriate level of education and clinical experience, and shouldn't incorporate any language that restricts the current practice of nurse-midwives.

We have read over the comments provided to the Board by the Pennsylvania Association of Licensed Midwives and fully endorse their remarks in regard to the above issues. PSNA recommends that their comments be taken into careful consideration as these proposed regulations are reviewed.

Thank you for the opportunity to offer comments on this important matter, and please feel free to contact me at the number below.

Sincerely,

Betsy Snook, M.Ed., BSN, RN  
Executive Director  
The Pennsylvania State Nurses Association  
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