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January 12, 2008

Sabina Howell  
Board Council  
PO Box 2649  
Harrisburg PA 17105-2649

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Dear Ms Howell:

As a Certified Nurse Midwife practicing in the state of Pennsylvania, I am gratified to hear of PL324 passing. The Law establishes prescriptive authority for midwives in Pennsylvania. I am concerned that the regulations promulgated by the Board of Medicine to fulfill the mandate of the law do not properly fulfill the intent and written substance of the law.

The written regulations redefine the practice of midwifery. The requirement for Board of Medicine approved collaborative agreements adds unnecessary and unsupported complexity and expense to midwives ability to provide safe care.

Midwives provide gynecological and early pediatric care as well as Obstetrical care. Midwives frequently staff low income clinics and are the only primary providers seen by these patients. Midwives are frequently trained in the same classes side by side with women's health Nurse Practitioners and have the same ability to provide well women care. Further they are often the only providers offering these services in their community.

The actions of the Board of Medicine will restrict access to care unnecessarily for Pennsylvanians, especially the most vulnerable.

Please consider amending and correcting the regulations to clearly fulfill the intent of the legislation. Thank you for your attention to this manner.

Sincerely,



Audrey K. Groff, CNM  
Director of Midwifery Services  
The Reading Hospital and Medical Center