

January 10, 2008

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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 was very pleased 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 written 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.

I believe that several of my partners have alerted you to problematic changes which would limit the scope of care we will be providing in part by making it unnecessarily difficult to procure prescriptive authority and in part by outright reducing midwives scope of practice. 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,



Kathleen Coco CNM, WHNP, MSN