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**To:** [DPH-Testimony, Reg (DPH)](mailto:RTestimony@MassMail.State.MA.US)

**Subject:** Clinic Licensure Regulations, hearing 10/25/16

**Date:** Sunday, October 23, 2016 6:38:38 PM

I am writing as a practicing nurse-midwife and member of the Massachusetts Chapter of the American College of Nurse Midwives I am also the MA ACNM representative to the MADPH Perinatal Committee. I'd like to recommend the following changes to the draft regulations 105 CMR 140.901, Birth Center Written Policies and Procedures:

In accordance updated regulations on the practice of nurse midwifery that allow independent practice:

1. 140.902 (B): remove 'for midwifery management of care' and add 'that are outside the scope of midwifery practice', as midwives do not require physician supervision as per 244 CMR 4.06 (2).

The full sentence would read as follows: The Director of Medical Affairs shall be responsible for advising and consulting with the medical staff of the birth center on all matters related to medical management of pregnancy, birth, post-partum, newborn and gynecologic health care including policies, procedures and protocols that are outside the scope of midwifery practice.

1. Remove 140.902 (C), as nurse-midwives have full prescriptive authority and do not require physician supervision as per Massachusetts regulations 244 CMR 4.07(2)

Thank you for your consideration.

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