

**Midwifery Scope of Practice Comments
March 6 through March 12, 2013**

<p>Emergency Medical System situations should be exempt from the proposed rules for midwifery as the EMCT on scene is under the medical direction of an online or off line medical director, and are better equipped to handle a situation where they have been called too respond and transport.</p>	<p>Wed, Mar 11, 2013 6:34 PM</p>
<p>As an Emergency Physician and the EMS Medical Director for three different fire departments, I would like to express my concerns about this expanded scope of practice. The types so births being recommended for inclusion are very high risk. Doing these types of births at home will undoubtedly increase the maternal and fetal morbidity and mortality. When a bad outcome happens, and it is only a matter of time until something happens, my paramedics are called to pick up the pieces. This increases their malpractice exposure for problems not of their making. If this expanded scope of practice is enacted, I would suggest mandatory malpractice coverage for midwives and legislative malpractice protection for EMS and hospitals accepting these patients. M. Todd Clever, MD Emergency Physician Medical Director, Avondale, Buckeye, and Tolleson Fire Departments</p>	<p>Wed, Mar 6, 2013 2:03 PM</p>
<p>I am a consumer of midwife services. I have had two healthy children and am pregnant with my third. I have an educational background in biology and chemistry. I have worked for 4+ years in the medical profession. I am an educated consumer of healthcare. The midwife scope of practice does not reflect the fact that I am able to make responsible decisions about my own healthcare and the care of my children. The rules state, in their revised condition, that the only test I may freely refuse is the blood work for chlamydia. The rules should state that the client may refuse any treatment or testing, i.e. HIV, gonorrhea, chlamydia, syphilis, Rh, diabetes, Rhogam, etc. as long as the client is informed of all the risks and benefits of treatment and/or testing and is considered low risk for the condition being tested for or treated. As an educated, responsible woman I have the ability and should have the right to make informed decisions regarding prenatal and postnatal treatment. The laws regarding midwife scope of practice should respect that fact and should clearly state this as the case.</p>	<p>Wed, Mar 6, 2013 1:35 PM</p>