

Midwifery Scope of Practice Comments December 19 through 25, 2012

I am a Licensed midwife covering the Yavapai County area. I'd like to express my concern regarding the proposed requirement for LMs to have a letter from a physician agreeing to assume care in situations that are outside of the midwife's scope of practice. This requirement is extremely unrealistic, and I believe it would seriously limit the number of practicing midwives in Arizona, thus restricting women's access to their choice of care provider. Even physicians who actively back up and support home birth mothers and their midwives are not going to put an agreement like this into writing. That would be professional suicide. In my area, doctors are threatened with loss of hospital privileges if they back up midwives. And last time I checked, malpractice agreements do not favor MDs who have in writing a plan to back-up midwives. There are wonderful doctors who enjoy working with home birth families and midwives. This should be encouraged for the physical and emotional safety of the moms and babies we serve. Let's not make it any harder on these courageous doctors than it already is. Let's not make it impossible for midwives to meet the state's requirements. This requirement must be removed entirely.

I had two home births in the Verde Valley with a midwife who traveled an hour from Prescott to serve me. My other option was a midwife in Flagstaff, also an hour away. I am concerned with the new licensing requirements as they especially affect new midwives who want to serve the northern Arizona population. There currently is one doctor who is supportive of midwifery in the Prescott, Verde Valley and Sedona areas. He practices in Cottonwood. In fact, my midwife will bring her tri-city clients to Verde Valley Medical Center in Cottonwood if they need transport because of this doctor. If a new midwife applying for licensure is required to have letters of recommendation from medical providers, it would eliminate her from the process due to the lack of support in Northern Arizona. In addition, any requirement for a named back up doctor would eliminate her from the process. The hostile environment in Northern Arizona against licensed midwives from the medical community needs to be considered.

“R9-16-102. Qualifications for Licensure Application for Initial Licensure: Applicant information, including documentation verifying applicant’s citizenship, applicant’s age (changed from 18 to 21), whether convicted of a felony or misdemeanor, completed education, North American Registry of Midwives certification, current photograph of applicant (moved from R9-16-103), attestation acknowledging true and accurate and applicant’s signature;” I know of a very special, mature, dedicated young woman who has and is working very hard to reach her goal of being a licensed midwife. She is 18 currently and if the above change to the “R9-16-102” occurs that would cause her to have to wait 2 more years to get her license. This seems like a very unreasonable request for someone who has already invested time, energy into the training and is so close. I suppose I can understand a change for those entering the process in the future if that is actually necessary but not for someone already in the process. Please consider carefully the above change to "applicant’s age".