

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 26, 2014 1:44:25 PM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 26, 2014 9:54 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 26, 2014 - 09:53

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Melissa

Last Name: Bates

Title: LM, CPM

Organization you are affiliated with: ATM

City: Katy

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or
Opposed:

I have recently been made aware of an odd attempt to move the Texas Midwifery Board to another division, which concerns me. The Texas Midwifery Board is not due for Sunset Review until 2016-2017. Any changes to the make-up of the Midwifery Board or its law or rules should be held off until that review.

For multiple reasons it is imperative that The Texas Midwifery Board NOT be moved to the Department of Licensing and Regulation. DSHS is best equipped to regulate health care professions. As it stands the board is able to have the authority to make rules and regulate the profession, continually improving safety and maintaining best practice standards - this would be taken away if the board was moved to another licensing agency.

Midwives are unique health care professionals working with moms and babies and their health and safety require more than the department of licensing can offer.

Any Alternative or New Recommendations on This Agency:

I have also been made aware that ACOG/TCOG have stated in their comments that there is a conflict of interest due to Licensed Midwives holding the majority on the Midwifery Board. The argument doesn't make sense as doctors hold the majority on the Medical Board and nurses hold the majority on the Board of Nursing. I was told during the last Sunset Review, it was the Sunset Review Commission that chose to give midwives a majority on the Board since other Boards at DSHS and around the country have practitioners from that profession as the majority on the Board.

ACOG/TCOG have stated in their comments that "lay midwives" should have to comply with ACME standards and take the AMCB exam for certification. First, Licensed Midwives are not "lay midwives". The Texas Midwifery Board already requires standardized education for Licensed Midwives as well as the NARM exam, a 350-question, eight-hour comprehensive midwifery exam. NARM is accredited by the National Commission for Certifying Agencies (NCCA) which is the same accredits ACME. The requirements recommended by ACOG/TCOG are for

nurse-midwives with an expanded scope beyond that of the Licensed Midwife and are not specialized for providing care in out-of-hospital settings. These standards would put over 200 midwives out of business, harming Texas' economy and reducing access to maternity care for thousands of Texans.

I personally received midwifery care during my fourth pregnancy and birth.

The experience was incredibly positive and empowering, so much so that I enrolled in a midwifery program after that delivery in order to become a midwife myself. I feel women should have a choice in healthcare providers and that we need to keep that in mind when making any changes to the Board.

No changes are currently needed to the Texas Midwifery Board and revisions should be discussed during the 2016-2017 review.

My Comment Will Be Made Public: I agree