

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, July 01, 2014 7:54:52 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, June 30, 2014 10:30 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 30, 2014 - 22:29

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Danielle

Last Name: Benito

Title: LM

Organization you are affiliated with:

City: Argyle

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I am concerned that moving the Texas Midwifery Board to the Department of Licensing and Regulation will seriously compromise the future of safe, quality maternity and newborn care for Texans. Midwifery is a health care profession, and its licensing and regulation belongs under the Department of State Health Services. Moving the Midwifery Board to the Department of Licensing would cancel its ability to continually improve safety and enforce evidence based practice standards.

Any Alternative or New Recommendations on This Agency:

Licensed midwives should continue to hold the majority on the Midwifery Board. This is not a conflict of interest. DSHS medical and nursing boards all have their respective professionals as the board majority, as they are best able to understand their profession and regulate themselves.

In response to ACOG/TCOG comments, Licensed Midwives are not "lay midwives".

Lay midwives are illegal in Texas. Texas Licensed Midwives have met standardized education requirements and have passed a comprehensive midwifery exam administered by NARM (the North American Registry of Midwives). NARM is accredited by NCCA, which also accredits ACME. The educational standards required for Texas Licensing and NARM credentialing are specialized to prepare and equip midwives for out-of-hospital care. The Texas Midwifery Board is not due for a review until 2016, and revisions should be discussed at that time.

My Comment Will Be Made Public: I agree