

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, June 24, 2014 3:51:01 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 24, 2014 1:07 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 24, 2014 - 13:07

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Deborah

Last Name: Blumentritt

Title: Changes to the Texas Midwifery Law

Organization you are affiliated with: None

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: At home in Austin several years ago my husband and I were pleased to have a most beautiful experience giving birth to our third child with the help of a Licensed Midwife and her assistant. They took superior care of us from prenatal care through labor, delivery, and post-delivery. Since these highly studied midwives already do superior work taking care of pregnancies and births, I believe that all the structure of the Midwifery Board, its laws and rules, should not be up for any change at this time and considerations ought to be tabled until the review that is due in the 2016-17 Sunset Review.

Also, since the Midwifery Board's major ongoing goals are to continually improve safety and maintain the best practices, and since the DSHS is by far the best agency to regulate health care professionals, then the Texas Midwifery Board should not be moved to the Dept. of Licensing and Regulation.

A move of the Midwifery Board to the Dept. of Licensing and Regulation will keep the Midwifery Board from having rule-making authority which a must for safety and best practices! Lastly, please note that Licensed Midwives are not the same as doctors, nurse, and physician assistants who are medical professionals, and as such, the past Sunset Review Commissions have wisely rejected the idea of moving the Texas Midwifery Board to the Medical Board or to the Board of Nursing.

Any Alternative or New Recommendations on This Agency: Please note that doctors and nurses already hold the majorities on the Medical Board and Board of Nursing. So please understand that when ACOG/TCOG state that Licensed Midwives holding a majority on the Midwifery Board is a conflict of interest, there is indeed, equally, no such conflict of interest. Note also that during the last Sunset Review, the Sunset Review Commission chose to give midwives a majority on the Board since this is the same as other DSHS Boards and like Boards across the rest of the country. Moreover, Licensed Midwives are not "lay midwives" as ACOG/TCOG have stated in their comments, and so Licensed Midwives should not have to comply with ACME standards nor take the AMCB exam for certification. This is because current requirements of the Texas Midwifery Board include standardized education

for Licensed Midwives as well as the NARM (which is accredited by the National Commission for Certifying Agencies [NCCA]) exam which is a 350-question, eight-hour comprehensive midwifery exam. Understand that NCCA accredits ACME, and 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 the out-of-hospital settings. These unwise proposed new standards would put over 200 midwives out of business, and this would not only harm our Texas' economy, but it also would greatly reduce access to maternity care for many thousands of Texans. Finally, please take note that 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