

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, June 30, 2014 8:24:58 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Saturday, June 28, 2014 11:31 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Saturday, June 28, 2014 - 23:30

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Nicole

Last Name: Bradford

Title: Ms.

Organization you are affiliated with: none

City: Pflugerville

State: Texas

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

I am writing about the current review of The Texas Midwifery Board. I have two children, one born at the North Austin Medical Center under the care of an obstetrician and one born at home under the care of a licensed midwife. My experience with a licensed midwife was excellent.

I do NOT believe the Midwifery Board should be moved to the Department of Licensing and Regulation. As a crucial component of women's healthcare, midwifery is best regulated by DSHS. A move to TDLR will eliminate the rule-making authority of the Midwifery Board, an ability critical to continually improving safety and maintaining best practice standards.

Any Alternative or New Recommendations on This Agency:

ACOG and TCOG have stated in their comments that there is a conflict of interest due to Licensed Midwives holding the majority on the Midwifery Board. However, doctors hold the majority on the Medical Board and nurses hold the majority on the Board of Nursing. 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.

Additionally, 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. 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, reducing access to maternity care for thousands of Texans.

I believe no changes are currently needed to the Texas Midwifery Board and revisions should be discussed during the 2016-2017 Sunset Review.

My Comment Will Be Made Public: I agree