

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 3:58:34 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 24, 2014 9:49 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 24, 2014 - 09:48

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Bridget

Last Name: Brown

Title: Certified Childbirth Educator

Organization you are affiliated with: The Bradley Method

City: Austin

State: Texas

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

All three of my children were born with the expert care of midwives; one in the hospital, and two at home.

Any changes to the make-up of the Midwifery Board or it's law or rules can wait until the Texas Midwifery Board is due for Sunset Review in 2016-2017.

Because we all care about safety and maintaining best-practice standards, the Texas Midwifery Board should not be moved to the Department of Licensing and Regulation. DSHS is best equipped to regulate health care professions. The move will eliminate rule-making authority of the Midwifery Board, an ability crucial to continually improving safety and maintaining best practice standards.

The Sunset Review Commission has already rejected the idea of moving the Texas Midwifery Board to the Medical Board or the Board of Nursing. These are not viable alternatives since Licensed Midwives are not doctors, nurses, or physician assistants. ACOG/TCOB will agree - they are not medical professionals.

Any Alternative or New Recommendations on This Agency:

The Sunset Review Commission has already chosen to give midwives a majority on the Midwifery Board since other Boards at DSHS and around the country have practitioners from that profession as the majority on their Board; eg.

doctors hold the majority on the Medical Board and nurses hold the majority on the Board of Nursing.

ACOG/TCOG are recommending that "lay midwives" (licensed midwives are not "lay midwives") should have to

comply with ACME standards and take the AMCE exam to be certified.

However, licensed midwives already take the Texas Midwifery Board-required standardized education for licensed midwives as well as the 350-question, eight-hour comprehensive midwifery exam - the NARM exam. NARM is accredited by the National Commission for Certifying Agencies (NCCA), which is the same one that accredits ACME.

The requirements recommended by ACOG/TCOG are for nurse-midwives with an expanded scope beyond that of the Licensed Midwife, not for specialists 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 and harming Texas' economy.

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