

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 4:37:51 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 30, 2014 2:54 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 - 14:54

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Elizabeth

Last Name: Burch

Title:

Organization you are affiliated with:

City: Austin

State: Texas

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

When making the decision to use a Licensed Midwife for the birth of my son, I was so pleased with the State's progressive stance on midwifery and licensing. And my experience with the professionalism and excellence of care I received from the Licensed Midwife I hired only reaffirmed this.

I am writing to ask that you keep being at the forefront of women's health and childbirth options by tabling any changes to the Texas Midwifery Board or it's law or rules until the Board is due for Sunset Review in 2016-2017.

Please do not eliminate the rule-making authority of the Midwifery Board as this is crucial to continually improving safety and maintaining best practices. Other professionals hold the majority on their boards, such as doctors on the Medical Board and nurses on the Board of Nursing. I do not think this is a conflict of interest in any way.

I firmly believe DSHS is the state department best equipped to regulate health care professions, not the Dept. of Licensing and Regulation. The Medical Board and the Board of Nursing are not viable alternatives because Licensed Midwives are health care professionals but they are not doctors, nurses or physicians assistants.

Any Alternative or New Recommendations on This Agency:

Again, 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. 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.

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.

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