

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, June 25, 2014 4:47:17 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 25, 2014 8:35 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 25, 2014 - 08:34

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Caryn

Last Name: Burt

Title:

Organization you are affiliated with:

City: Austin

State: Texas

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

I am a birth doula and have attended almost 100 births in my 4-year career, mostly in hospitals with OBGYN's. When it came time to plan for my own birth this past year, I knew that I wanted to deliver with a midwife. The few midwife-attended births that I witnessed in my career as a doula showed me the great difference between the obstetric and midwifery models of care. I chose a midwife because I wanted to feel safe, respected, informed, and educated. I had a beautiful birth to a healthy baby girl in April 2014, and I wholeheartedly believe that my pregnancy and birth were normal and healthy because of the steadfast and comprehensive care provided by my midwives. It is because of my amazing experiences with midwives as a birth doula and at my own birth that I find it so important to speak out and protect midwives' right to practice in Texas.

I am concerned that if the Texas Midwifery Board is moved to the Department of Licensing and Regulation, midwives and midwifery care in Texas will suffer. DSHS is best equipped to regulate health care professions. It seems that it could jeopardize the ability of the Midwifery Board to make rules that govern the safety of midwifery practice in Texas.

Any Alternative or New Recommendations on This Agency:

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 so I am not sure why this is a problem.

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. I object to the term "lay midwives" being used to describe Licensed Midwives.

Licensed Midwives are highly-trained, skilled, and certified healthcare professionals. 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.

I do not think that any changes are currently needed to the Texas Midwifery Board, and revisions should be discussed during the 2016-2017 review.

Midwifery care is so important for women in Texas and should be protected and strengthened. Birthing outside of a hospital setting with a Licensed Midwife is safe and can be hugely beneficial. It was for me. My midwife is arguably the best and most knowledgeable healthcare professional I've had, and I fear these new proposals will threaten her services to women who need them.

My Comment Will Be Made Public: I agree