

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 3:54:19 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 24, 2014 11:48 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 - 11:47

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Chelsea

Last Name: Campbell

Title:

Organization you are affiliated with:

City: Houston

State: Texas

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

As a labor support person and licensed massage therapist, I have attended around sixty births out of hospitals (either at a home or at a birth center) under the care of certified professional midwives. While transport and interventions were necessary in particular cases, all cases had outstanding outcomes and the mothers feel they had a positive experience due to the option of midwifery in the state of Texas and the improving collaboration by different health care providers.

Upon hearing the suggestion that the midwifery board may be moved to the Department of Licensing and Regulation, I first had to look up the department. I had never heard of it. What I found were a group of industries that, while needing regulation, were not related to health at all. Midwifery is a healthcare field and interacts with other areas of the DSHS: the filing birth certificates through the Vital Statistics Unit, Newborn screening, and reporting diseases are all typical parts of the license. It just doesn't make sense to have them regulated by the TDLR. Regardless, I believe any potential changes that would completely restructure the licensing of midwifery be tabled until the scheduled Sunset in two years.

In closing, I would encourage the Sunset Committee to read the International Confederation of Midwives Definition of a Midwife (which has been approved by the WHO and International Federation of Gynecology and Obstetrics) and truly examine where midwifery falls in the regulatory bodies. Where would the public be served the best?

Any Alternative or New Recommendations on This Agency: ACOG has proposed that "lay midwives" be required to take the AMCB exam for certification. I disagree, and the proposal reflects ignorance on many levels. First of all, "lay midwives" are uncommon in Texas, as the state requires licensing to practice midwifery. Direct entry midwives who are licensed (LM) have their own certification, the CPM, which requires verification of clinical experience, skills and caregiving abilities, good character, and knowledge.

The last criteria- knowledge- is verified through the NARM exam, which tests a very different scope of practice than

the AMCB exam.

My Comment Will Be Made Public: I agree