

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: DSHS Sunset Review
Date: Tuesday, June 24, 2014 3:51:35 PM

From: Lynette Cannon
Sent: Tuesday, June 24, 2014 12:55 PM
To: Sunset Advisory Commission
Subject: DSHS Sunset Review

Dear Sirs and Madams,

Please consider these facts when reviewing the Department of State Health Services Midwifery Board:

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. In the past the Sunset Review Commission has 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/TCOG have stated that there is a conflict of interest due to Licensed Midwives holding the majority over 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 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 academic and clinical education for Licensed Midwives as well as the NARM (North American Registry of Midwives) exam, a 350-question, eight-hour comprehensive midwifery exam. NARM is accredited by the National Commission for Certifying Agencies (NCCA) which also 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 Licensed 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.

Sincerely,

Lynette Cannon LM, CPM