

**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 3:51:23 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Tuesday, June 24, 2014 12:55 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 24, 2014 - 12:55

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Kelli

Last Name: Cross

Title:

Organization you are affiliated with:

City: Greenville

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I am commenting in regard to the recommendation by the commission to move the Texas Midwifery Board to the Texas Department of Licensing and Regulation. I do not support such a move and feel it would be to the detriment of the midwifery profession in the state of Texas. It is important that the Board be allowed to retain their rule-making authority to ensure the improvement of the safety and practices of midwifery. This is integral to my family's choices and freedom in Texas, as we have used midwifery care for all four of our pregnancies and births. I suggest that all changes be tabled until the 2016-2017 Sunset Review for the the Texas Midwifery Board. As licensed midwives are not medical professionals, but do provide health services, the DSHS is the ideal department for the TMB.

Any Alternative or New Recommendations on This Agency: Midwives should continue to hold the majority of The Texas Midwifery Board, contrary to ACOG/TCOG's comments. I agree that the Commission made the best choice during the last Sunset Review to have the board reflect the majority as do the Medical Board and Board of Nursing. Also, I disagree with their comment that licensed midwives should have to comply with ACME standards and sit for the AMCB exam. LMs are already required to pass the comprehensive NARM exam, which is accredited by the National Commission for Certifying Agencies, the same agency that accredits the ACME. These standards would put more than 200 Texas midwives out of business, including my own, limiting my family's freedom and ability to access quality maternity care and hurt the Texas economy to which we contribute. LMs do not practice with the same scope of nurse-midwives, and therefore, should not be required to certify at the same level. No changes are needed to the Texas Midwifery Board at this time.

My Comment Will Be Made Public: I agree