

**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 8:42:18 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Sunday, June 29, 2014 9:20 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Sunday, June 29, 2014 - 21:20

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Sylvia

Last Name: Duke

Title:

Organization you are affiliated with:

City: Hawkins

State: Texas

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

As the Texas Midwifery Board is not due for Sunset Review until 2016-2017, I feel that any changes to the make-up of the Midwifery Board/it's law or rules should be tabled until that review.

The Texas Midwifery Board should not be moved to the Department of Licensing & Regulation because DSHS is best equipped to regulate health care professions. Such a move would eliminate rule-making authority of the Midwifery Board, which is an ability crucial to continually improving safety and maintaining best practice standards for Midwives.

The Sunset Review Commission has previously rejected the idea of moving the Texas Midwifery Board to the Medical Board or the Board of Nursing: Licensed Midwives are not doctors, nurses, or physician assistants. They are not medical professionals.

I have had excellent care from a Licensed Midwife through 5 pregnancies and births.

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. As doctors hold the majority on the Medical Board and nurses hold the majority on the Board of Nursing, there surely is no issue. 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. However, 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