

**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 3:40:19 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Tuesday, June 24, 2014 2:48 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 - 14:47

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Melissa

Last Name: Duncan

Title:

Organization you are affiliated with:

City: Caddo Mills

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: The TX midwifery board is not due for Sunset Review until 2016-2017.

Any changes to the midwifery board or its laws should be tabled until that review. The TX midwifery board should not be moved to the Dept of Licensing and Regulation. DSHS is best equipped to regulate health care professions. This move would eliminate rule making authority of the midwifery board. This is crucial to continually improving safety and maintaining best practice standards. I have experienced a hospital birth and a midwife birth. The latter was the best experience by far. Please do not make this change. The care was excellent with the midwife.

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. During the last Sunset Review, it was the Sunset Review Commission that chose to give midwives a majority on the Board. Licensed Midwives are not "lay midwives." they are required to take a standardized education as well as an 8 hour comprehensive exam. NARM is accredited by the NCCA which is what accredits ACME. The requirements recommended by ACOG/TCOG are for nurse-midwives. They are not specialized for providing out-of-hospital care. These standards would harm TX economy and put over 200 midwives out of business and reduce care to for thousands of Texas. No changes are necessary to the TX Midwifery Board and revisions should be discussed during the 2016-2017 review.

My Comment Will Be Made Public: I agree