

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, June 27, 2014 4:49:37 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 27, 2014 2:13 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 27, 2014 - 14:13

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Daphne

Last Name: Hager

Title:

Organization you are affiliated with:

City: Houston

State: Texas

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

I have received excellent care by Licensed Midwives during my two pregnancies and births as well as during the postpartum stage. It is crucial that Texas continues to offer the best support possible to its midwives, as they continue to support the health and livelihood of its mothers and children.

The Texas Midwifery Board is not due for Sunset review until 2016-2017; I believe any changes to the Midwifery Board's law or rules should be tabled until that review.

I believe that The Texas Midwifery Board should continue to be regulated by DSHS, as DSHS is best equipped to regulate health care professions. Moving the Texas Midwifery Board to the Department of Licensing and Regulation would remove the board's ability to continue to improve safety and best practice standards.

Further, Licensed Midwives are not doctors, nurses, or physician assistants and therefore should not be moved to the Medical Board or the Board of Nursing.

Any Alternative or New Recommendations on This Agency:

I disagree with the idea that there is a conflict of interest due to there being a majority of Licensed Midwives on the Midwifery Board. It is consistent with the practice of other states through the nation, and consistent with doctors' majority on the Medical Board and nurses' majority on the Board of Nursing.

Licensed Midwives are not "Lay Midwives". The Texas Midwifery Board already requires rigorous testing via NARM for Licensing. There is no need to change this practice, and it would not make sense to test midwives against ACME standards with the with the AMCB exam, as this exam does not provide testing of education in out-of-hospital settings. Rather, it is focused on Nurse-Midwives and their separate scope of practice. Changing the testing standards would put over 200 competent, capable midwives out of business in Texas, which would be an

unfounded travesty, reducing the amount of available care to women in Texas that demand this valuable service.

There are no changes that need to be made at this time to the Texas Midwifery Board, Revisions should be discussed during the 2016-2017 review.

My Comment Will Be Made Public: I agree