

**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 9:03:48 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 26, 2014 6:33 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 26, 2014 - 18:33

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Andrea

Last Name: Hall

Title:

Organization you are affiliated with:

City: Granbury

State: Texas

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

I have experienced excellent care from a Licensed Midwife through two healthy pregnancies, and am again under a Licensed Midwife's care for my current healthy, normal pregnancy. The Texas Midwifery Board is not due for Sunset Review until 2016-2017. Any changes to the make-up of the Midwifery Board or it's law or rules should be tabled until that review.

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.

Any Alternative or New Recommendations on This Agency:

Licensed Midwives should continue to hold a majority on the Midwifery Board, just as doctors hold a majority on the Medical Board and nurses hold a majority on the Board of Nursing.

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