

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 9:04:51 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 26, 2014 4:36 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 - 16:35

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Nichole

Last Name: Heilbron

Title:

Organization you are affiliated with:

City: Joshua

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: The Texas Midwifery Board should not be moved to the Department of Licensing and Regulation. DSHS is best equipped to regulate health care professions. Midwifery is not the same as other professions regulated by the TDLR. It needs to retain the experience of DSHS regarding 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: 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 since other Boards at DSHS and around the country have practitioners from that profession as the majority on the Board. There is no conflict of interest with a majority of a board being reflective of the professions it oversees. It makes no sense for attorneys to make up the majority of a Nursing board and have decision making authority in an area for which they are not experts.

My Comment Will Be Made Public: I agree