

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 3:41:44 PM

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

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

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Karli

Last Name: Hetherington

Title:

Organization you are affiliated with:

City: Round Rock

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. Licensed Midwives are trained healthcare professionals who provide evidence-based care to women in normal, low-risk pregnancy and birth. DSHS is best equipped to regulate health care professions. The move would also 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 commented 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.

ACOG/TCOG also 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 successful completion of 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 revised standards would put over 200 midwives out of business, harming Texas' economy and reducing access to maternity care for thousands of Texans.

My Comment Will Be Made Public: I agree