

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 9:03:43 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 26, 2014 6:51 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 - 18:50

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Alison

Last Name: Hinojosa

Title:

Organization you are affiliated with:

City: San Antonio

State: Texas

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

First, 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 held until then.

Second, the Texas Midwifery Board should not be moved to the Department of Licensing and Regulation.

Midwifery practice is a health care profession, and regularly communicates and works with obstetricians. DSHS is best equipped to regulate health care professions, and keeping related fields together will be best to continually improving safety and maintaining best practice standards.

Any Alternative or New Recommendations on This Agency:

Direct-Entry Midwives are best tested under NARM requirements since this standard bests deals with out-of-hospital births (as opposed to ACME standards). Both the NARM exam and AMCB exam are both accredited by the National Commission for Certifying Agencies (NCCA). Requiring Direct-Entry midwives (not "lay-midwives" but Licensed Midwives) to qualify for an exam that specializes in in-hospital births would not only be redundant, but would put over 200 midwives out of business, harming Texas' economy and reducing access to maternity care for thousands of Texans.

I will add that Direct-Entry midwives that sit for the AMCB are licensed as Certified Midwives (CM). Currently only New York and New Jersey have health care systems able to accommodate Certified Midwives. There is no school in Texas able to teach for Certified Midwives. The current Texas Licensing for Direct-Entry Midwives and Certified Professional Midwives has been very well regulated and has served the public well. There is no need for a change of licensing requirements as drastic as what the ACOG/TCOG has proposed.

My Comment Will Be Made Public: I agree