

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, June 30, 2014 8:19:18 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Saturday, June 28, 2014 1:36 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Saturday, June 28, 2014 - 13:35

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Chelsea

Last Name: Hovenweep

Title:

Organization you are affiliated with:

City: Austin

State: Texas

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

I recently learned that in your review of the Department of State Health Services, you have recommended that the Texas Midwifery Board be moved to the Department of Licensing and Regulation. I feel that this move would be detrimental both to Licensed Midwives, and to those who choose a Licensed Midwife's care for their pregnancy and birth. Moreover, the Texas Midwifery Board is not up for review until 2016-2017. Any changes to the board's rules, composition, and regulation could be considered at that time.

I am a mother of two, with another on the way, and I have received excellent care from a licensed midwife during each of my pregnancies. When my first child was born, we lived in Massachusetts, where midwifery is not regulated by the state, and while I personally had an amazing midwife, I was very excited to move to Texas where midwives are supported, recognized and regulated through the Department of State Health Services. Considering that pregnancy and birth are the most significant events that have occurred in my health history, I very strongly feel that this department is best equipped to oversee the Midwifery Board. The Department of Licensing and Regulation does not have the experience and expertise in health care necessary to appropriately regulate midwives. This move also would take away the rule-making authority of the Midwifery Committee -- an authority that is key to ensuring that every woman seeking the care of a midwife receives the best, safest possible care during her pregnancy and birth.

Please reconsider your recommendation and leave the Midwifery Board under the auspices of the Department of State Health Services.

Any Alternative or New Recommendations on This Agency:

Please allow Licensed Midwives to maintain the majority on the Midwifery Committee. Midwives are the people

most knowledgeable about their own profession. Doctors hold the majority on the Medical Board and nurses hold the majority on the Board of Nursing for this reason.

The ACOG/TCOG have also recommended that midwives in Texas all be required to pass certification exams intended for nurse-midwives. Midwives in Texas are already required to complete a standardized course of education and to pass a rigorous exam accredited by the same organization which accredits the exam for nurse-midwives (National Commission for Certifying Agencies (NCCA)).

Requiring all midwives in Texas to be certified as nurse-midwives is unnecessary, and would reduce access to maternity care in our state.

I really appreciate the high-quality choices for maternity care available to me as a resident of the state of Texas. It is a point of pride. The Midwifery Board should be allowed to continue the work they have done to make one of those choices -- that of maternity care with a Certified Midwife -- safe and accessible. I believe the current system ensures that Certified Midwives are highly qualified and well-regulated. Please hold any discussion of revisions until the scheduled 2016-2017 review.

My Comment Will Be Made Public: I agree