

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 4:49:35 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 30, 2014 11:24 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 30, 2014 - 11:24

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Rachel

Last Name: Johnson

Title: Texas Midwifery Board

Organization you are affiliated with: TCBN

City: Ft Worth

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.

The move will eliminate rule-making authority of the Midwifery Board, an ability crucial to continually improving safety and maintaining best practice standards.

The Texas Midwifery Board is not due for Sunset Review for 2-3yr. Absolutely NO changes should not be discussed until that review.

Moving the Texas Midwifery Board to the Medical Board or the Board of Nursing is not a viable alternative since Licensed Midwives are not physician assistants, doctors, nurses. They aren't medical professionals!

Any Alternative or New Recommendations on This Agency:

Licensed Midwives are not "lay midwives"!

COG/TCOG, there is not a conflict of interest because Licensed Midwives hold the majority on the Midwifery Board. Doctors hold the majority on the Medical Board & nurses hold the majority on the Board of Nursing. DSHS, don't discriminate because of title. Other Boards around the country have practitioners from their profession and are in the majority on their Boards.

Infact, it was the Sunset Review Commission themselves that chose to give midwives a majority on the Board during the last Sunset Review.

ACOG/TCOG have stated in their comments that "lay midwives" should have to comply with ACME standards and

take the AMCB exam for certification. That is NOT needed! The Texas Midwifery Board already requires standardized education for Licensed Midwives as well as the NARM. The NARM exam is a 350-question, eight-hour comprehensive midwifery exam. I will mention here that NARM is accredited by the National Commission for Certifying Agencies (NCCA) which is the same accreditation as ACME.

Imposing those standards would put over 200 Texas midwives out of business!

That would be harming Texas' economy and reducing access to maternity care for thousands of Texans like me! I have had 3 out of hospital births with Texan Licensed Midwives and will have at least 3 more. My husband and I believe that the requirements recommended by ACOG/TCOG should remain only for nurse-midwives. Nurse-midwives are not specialized for providing care in out-of-hospital settings like Licensed Midwives. Nurse-midwives' alone need the expanded scope for their hospital setting as a medical professional -Licensed Midwives do not.

I say, NO changes are currently needed to the Texas Midwifery Board! Any revisions should be discussed during the 2016-2017 review.

My Comment Will Be Made Public: I agree