

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 4:52:06 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 30, 2014 10:42 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 - 10:42

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Monique

Last Name: Johnstone

Title:

Organization you are affiliated with:

City: The Woodlands

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I am writing here today to offer my recommendations on the suspected changes to the Texas Midwifery Board. It has come to my attention that it has been suggested the Texas Midwifery Board be moved to the Texas Department of Licensing and Regulation. I suggest that that is a mistake. The Texas Midwifery Board is best to be regulated by the Department of State Health Services. They have experience with health care issues which would be best for the continuity of improving outcomes for mothers and babies. Moving the Texas Midwifery Board would take away the ability to set rules, based on the evidence, to improve safety and best practice standards. Midwives are a unique healthcare professionals, therefore in the past the move has been rejected. So once again I DO NOT believe it is in the best interest of women and their families to move the Texas Midwifery Board to the TDLR. I have had amazing and very personalized care through two pregnancies and births with licensed/certified midwives, I will want that same care with any future pregnancies and births.

Any Alternative or New Recommendations on This Agency: I would also like to state that it makes plenty of sense for midwives to hold the majority on the Texas Midwifery Board. The medical board consist mainly of doctors and the Board of nursing consists mainly of nurses. It is how we can achieve the best standard practices for the patients. Also, Texas Midwives must undergo comprehensive training and pass a NARM exam, which is a very thorough exam.

NARM is accredited by the NCCA. ACOG/TCOG have expressed in their comments that midwives should have to comply with ACME standards and pass the AMCB exam to certify. If the NCCA is capable of accrediting the ACME, they are capable of setting standards for the NARM. Therefore a certified midwife in Texas should not have to comply with the ACME, as they are a very unique type of healthcare professional and should have their own accreditation system.

Changing this would change the care thousands of Texans have received and plan to receive in the future. Thank you for your time.

My Comment Will Be Made Public: I agree