

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 8:59:57 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 27, 2014 8:08 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 27, 2014 - 08:07

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Nzinga

Last Name: Jones

Title:

Organization you are affiliated with:

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: DSHS currently regulates health care professions and should continue to do so with the The Texas Midwifery Board (which 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 tabled until it's review in a few years. Also, the Midwifery Board should not be consolidated with doctors or nurses since it's a unique and necessary health care profession. I have used the services of a midwife through two pregnancies and feel that the services provided were a perfect fit into my overall maternity health care needs alongside my nurses and doctors.

Any Alternative or New Recommendations on This Agency:

It's strange that ACOG/TCOG have stated in their comments that there is a conflict of interest due to Licensed Midwives holding the majority on the Midwifery Board when doctors hold the majority on the Medical Board and nurses hold the majority on the Board of Nursing. Nationwide, practitioners from their respective professions hold the majority on their respective regulatory Boards. Who else is better to regulate than a group of peers familiar with the ins and outs of the profession?

ACOG/TCOG have stated in their comments that "lay midwives" should have to comply with certain standards and certifications. But the Texas Midwifery Board already requires standardized education for Licensed Midwives (not "lay midwives") as well as examination. 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 out-of-hospital care. These standards would put many Licensed Midwives out of business, harming the state's economy and reducing access to comprehensive maternity care for thousands of Texans. There is a growing need for well trained, certified, and regulated out-of-hospital maternity care, and Texas should take note to retain, support, and expand the system instead of shrinking it. The US maternity system is lagging on the international scale and TX should be proud to take the lead and make improvements to better support families by providing a full spectrum of maternal

health care options. Again, no changes are currently needed to the Texas Midwifery Board and revisions should be discussed during it's 2016-2017 review.

My Comment Will Be Made Public: I agree