

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 8:25:08 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Sunday, June 29, 2014 12:01 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Sunday, June 29, 2014 - 00:01

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Ashley

Last Name: Klemm

Title:

Organization you are affiliated with:

City: Cypress

State: Texas

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

.. DSHS is best equipped to regulate health care professions.

The Midwifery Board must have rule-making authority to maintain best practice standards and continually improve safety. Under DSHS, the Midwifery Board has this authority. DSHS is best equipped to regulate health care professions. Therefore, the Texas Midwifery Board should not be moved to the Department of Licensing and Regulation.

Any Alternative or New Recommendations on This Agency: I have experienced two pregnancies/births under the excellent care of a Texas licensed Certified Professional Midwife. ACOG/TCOG do not need to change the standards and certification exam for Certified Professional Midwives. The philosophy of care is different, and the two professions (obstetrics and midwifery) should remain distinct. ACOG/TCOG have stated in their comments that "lay midwives"

should have to comply with ACME standards and take the AMCB exam for certification. First, Licensed Midwives are not "lay midwives". The Texas

Midwifery Board already requires standardized education for Licensed Midwives as well as the NARM exam, a 350-question, eight-hour comprehensive midwifery exam. NARM is accredited by the National Commission for Certifying Agencies

(NCCA) which is the same accredits ACME. 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 care in out-of-hospital settings. These standards would put over 200 midwives out of business, harming Texas' economy and reducing access to maternity care for thousands of Texans. Women deserve access to the care provider and birth place of their choice. We must preserve licensed midwifery as it is currently legislated in Texas!

My Comment Will Be Made Public: I agree