

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 9:04:47 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 26, 2014 4:38 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 26, 2014 - 16:37

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Lincey

Last Name: Knox

Title:

Organization you are affiliated with:

City: Lewisville

State: Texas

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

I have become aware of the possibility of changes occurring within the State Midwifery Board currently under review by the Sunset Committee. It is my understanding that the Texas Midwifery Board is not on the schedule for Sunset Review until 2016-1017. This current review is happening 2 years in advance and I believe it best that any changes in to the Midwifery Board and/or its laws and regulations be put on hold until the rightful time arrives for any changes to be made if deemed necessary. The rightful time would be when the next Sunset Review is scheduled to occur, which is 2016-2017.

It is also imprudent to moved the Texas Midwifery Board to the Department of Licensing and Regulation. I believe midwifery in Texas, as it falls under the umbrella of medical care should continue to be regulated by the DSHS. They have the understanding and knowledge base to be able to guide the practice of midwifery and to maintain that Texas Midwifery is continually improved and maintained as a safe profession.

This issue has been presented previously and the Sunset Committee rejected the idea of moving the Midwifery Board to the MEdical Board or Board of Nursing, as midwives are not doctors nurses, or physician assistants. These boards are not good alternatives due to the fact that midwives do not fall under these categories.

Any Alternative or New Recommendations on This Agency:

One issue that the ACOG/TCOG has presented is the idea that Licensed Midwives hold the majority of seats on the Midwifery Board. As a governing body over a profession it is generally those that hold the most knowledge and experience on the subject that compose a board or regulatory body. For the Medical Board the majority are doctors and for the Nursing Board, the majority are nurses.

I do not disagree with this organization and concerning the Medical and Nursing Boards, I don't know who would.

Most would agree that Doctors need to compose the Medical Board and this is an undisputed fact. However, the same should be assumed for the Midwifery Board. The Medical Board should not be composed of Licensed Midwives governing doctors and the Midwifery Board should not be composed of doctors, governing midwives.

As part of the last Sunset Review, it was decided by the Commission to give licensed midwives the majority of seats on the Board, mirroring the organization of other Boards at DSHS and around the country.

Comments have also been made by the ACOG/TCOG that "lay midwives" should be held to the same standard as Nurse Midwives and comply with ACME standards and requirements, specifically certification exams. I would like to point out that "lay midwives" are different from State Licensed Midwives. There is a distinction between the two. In order to become Licensed as a midwife in the state of Texas, you are required to complete a standardized educational program. This is then followed by an apprenticeship of no less than 2 years. You are then required to take and pass a standardized, written exam. This is the NARM Exam, that is an 8 hr comprehensive midwifery exam put forth by the North American Registry of Midwives, accredited by the National Commission of Certifying Agencies, which is the same agency that accredits ACME.

The requirements that the ACOG has proposed to place on Licensed Midwives are those that nurse midwives, who have a nursing degree and have obtained their masters in midwifery, are required to adhere to. Licensed Midwives are not nurse midwives and do not have the nursing background and are trained to care for women in the hospital setting with a medical model of care.

Imposing these standards on Licensed Midwives who are educated and trained to provide care in out-of-hospital settings would force many midwives out of their profession, greatly limiting a woman's access to maternity care in Texas.

There is currently no need for changes within the Texas Midwifery Board. Any changes or revisions should be presented and discussed during the 2016-2017 review.

Thank You

My Comment Will Be Made Public: I agree