

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 4:39:44 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 30, 2014 2:24 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 30, 2014 - 14:23

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Mary

Last Name: Loftin

Title: President

Organization you are affiliated with: Coalition for Nurses in Advanced Practice (CNAP)

City: Belton

State: Texas

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

Members of the Texas Sunset Commission:

I am writing to you as the Chair of the Coalition for Nurses in Advanced Practice (CNAP). CNAP is a coalition of organizations serving as an advocate for all advance practice registered nurses (APRNs) in Texas and actively monitors legislative and regulatory issues within Texas. Among our nine member organizations is the Consortium of Texas Certified Nurse Midwives (CTCNM). Please find below our positions regarding select Sunset staff recommendations in the Sunset staff report on the Department of State Health Services.

CNAP opposes the Sunset Commission's recommendation 3.2 in its report on the Department of State Health Services (DSHS) relating to midwives in Issue 3 (page 53). This report recommends moving the regulation of licensed midwives from the DSHS to the Texas Department of Licensing and Regulation (TDLR). The rationale is that TDLR can regulate health professions more effectively than DSHS and that midwives fall into a category of health professional with no direct connection to any of DSHS's larger activities regarding public health.

We believe that the DSHS staff possess unique knowledge and expertise in women's health that is needed for oversight of this group. Examples of the department's women's health mission include birth center licensing (where many Licensed Midwives work), the Family Planning Program, the Primary Expanded Health Care Program, breast and cervical cancer services, and Title V Maternal and Child Health Services.

In response to the two additional proposed recommendations from the American Congress of Obstetricians and Gynecologists (ACOG) and the Texas Association of Obstetricians and Gynecologists (TAOG), we submit the

following comments.

ACOG/TAOG Recommendation #2 on Midwifery Education and Certification CNAP endorses CTCNM's guiding principle supporting the goal of all midwives adhering to the standards set by the International Confederation of Midwives (and supported by the World Health Organization).

CNAP Point of clarification: We support the overall purpose of the ACOG/TAOG recommendation to require that licensed midwives comply with an educational and certification process. Licensed Midwives, however, have their own education and certification programs -- the Midwifery Education Accreditation Council (MEAC), which accredits educational programs for certified professional midwives (or licensed midwives as they are known in Texas), and the North American Registry of Midwives (NARM) which is the body that administers the certification exam for certified professional midwives. We support those avenues for them.

Thank you for your attention.

Any Alternative or New Recommendations on This Agency:

ACME and AMCB are education and certification programs specifically designed for Certified Nurse-Midwives and Certified Midwives (no regulatory path currently exists in Texas for Certified Midwives to practice). Thus, adding this avenue as an alternative education and certification process would promote additional quality resources for women's health in the state.

SUGGESTED REVISED RECOMMENDATION: Require completion of either a MEAC or an ACME educational program. Require certification of competency by either NARM or AMCB.

ACOG/TAOG Recommendation #3 on the Composition of the Midwifery Board

CNAP endorses Consortium of Texas Certified Nurse Midwives' (CTCNM's) position adhering to the beliefs and principles of the International Confederation of Midwives (ICM), which calls for equity in decision-making bodies. Thus, we do not support a greater number of CNMs on a CPM/LM Board.

Thank you for your attention.

My Comment Will Be Made Public: I agree