

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, June 25, 2014 8:00:48 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 24, 2014 11:46 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 24, 2014 - 23:45

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Melanie

Last Name: Lunsford

Title:

Organization you are affiliated with:

City: Hurst

State: Texas

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

It has come to my attention that The Texas Midwifery Board is not due for Sunset Review until 2016-2017 and for this reason any changes to the Midwifery Board or it's law or rules should take place then and no sooner. The Texas Midwifery Board should stay with the DSHS as it is best equipped to regulate health professions and not be moved to the Department of Licensing and Regulation. Moving the Midwifery Board would eliminate its rule-making authority which is essential to its ability to continually improve safety and maintain practice standards. The Sunset Review has rejected moving the Texas Midwifery Board to the Board of Nursing and to the Medical Board as these are not feasible alternatives since Licensed Midwives are not nurses, doctors, or physician assistants. I used licensed midwifery care for the birth of my last child and I received excellent care. Moving the Texas Midwifery Board to the Department of Licensing and Regulation would negatively impact licensed midwives from being able to provide excellent care.

Any Alternative or New Recommendations on This Agency:

Doctors hold the majority of the Medical Board and nurses hold the majority of the Board of Nursing. Licensed Midwives hold the majority of the Midwifery Board. At the last Sunset Review, it was the Sunset Review Commission that chose to give the midwives a majority on the Board as other comparable boards also have practitioners from that profession as the majority on the Board.

There is no conflict of interest due to licensed midwives holding the majority.

Licensed midwives are not "lay midwives" as the ACOG/TCOG comments would suggest and should not have to comply with ACME standards and take the AMCB test for certification that the ACOG/TCOG is recommending. The Texas Midwifery Board already requires standardized education for Licensed Midwives as well as the NARM exam- a 350 question, 8 hour comprehensive midwifery exam. NARM is accredited by the NCCA which also accredits ACME. Further, the ACOG/TCOG requirements are for nurse-midwives which is a scope beyond

Licensed Midwives and are not specialized for providing exceptional care in out of hospital settings. These proposed standards would put over 200 midwives out of business and harm the Texas economy and jeopardize access to maternity care for thousands of Texans. No change is needed to the Texas Midwifery Board at this time. Revisions should be discussed during the 2016-2017 review.

My Comment Will Be Made Public: I agree