

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 4:53:49 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 30, 2014 9:49 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 30, 2014 - 09:49

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Heather

Last Name: Martin

Title: IBCLC,RLC

Organization you are affiliated with: Beyond the Breast Lactation Services

City: Ft Worth

State: Texas

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

To Whom It May Concern,

I was recently alarmed to hear that despite the fact that the Texas Midwifery Board is not due for Sunset Review until 2016-2017, your department feels the need to move the oversight for Texas Midwives to the supervision and control of the Department of Licensing and Regulation.

The move to TDLR would eliminate the authority of the Midwifery Board, a crucial element in the course of improving safety and the maintenance of best practice standards.

I have had the benefit both personally and professionally of working alongside many midwives. Their knowledge and expertise has been a blessing through the care of pregnancies and successful deliveries of my last singleton birth and the birth of my multiples. The ability to consult with those midwives caring for my clients regarding their infants in the early postpartum days is a benefit to both the families and our professional relationship.

I am greatly opposed to the idea of my midwives and co-workers being regulated but the same department that regulates my plumber or electrician.

The Department of State Health and Services is best equipped to regulate health professionals in the state of Texas.

Any Alternative or New Recommendations on This Agency:

I believe that tabling the discussion of oversight and the potential movement of the Texas Midwifery Board should wait until 2016-2017 when they are up for the next Sunset Review.

The American Academy of Obstetrics and Gynecology (ACOG)and likewise, the Texas Committee of Obstetrics and Gynecology (TCOG)stated that there is a conflict of interest as Licensed Midwives hold the majority of the Midwifery Board, isn't this rightly so? Would we expect differently in any other field, whether it is Engineering, Meatpacking, Nursing or Physicians? Why would another professional entity hold the majority or oversight for the profession? Nurses hold the majority of the Board of Nursing, physicians hold the majority of the Medical Board

and so it should be with the Midwifery Board-that Licensed Midwives hold the majority.
The Texas Midwifery Board requires standardized education for all Licensed Midwives in addition to their exam.
Following suggestions of the ACOG/TCOG for lay midwives would greatly reduce the access to maternity care for thousands of Texans while also closing the businesses of over 200 Licensed Midwives, which in turn harms Texas economy.
NO changes are needed for the Texas Midwifery Board and any revisions should be tabled and discussed during the 2016-2017 review.

My Comment Will Be Made Public: I agree