

**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 4:44:36 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 27, 2014 3:16 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 27, 2014 - 15:15

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Molly

Last Name: Miller

Title:

Organization you are affiliated with:

City: Denton

State: Texas

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

As a former client of a Texas licensed midwife, I stand by their right to regulate their standards in the best way possible, by experts in their field.

It seems that DSHS is the best place for the Midwifery Board. I would hate to see access to midwifery limited to only nurse-midwives under the ACOG/TCOG standards. All of the licensed midwives in whose care I have been are excellent health-providers, extremely knowledgeable and professional, and I felt completely comfortable and safe putting my health and the health of my child in their hands. I do not feel that there is any need for these kinds of changes to the testing, certification, or regulation of licensed midwives in Texas.

Additionally, the Texas Midwifery Board is not due for Sunset Review until 2016-2017. Any changes to the make-up of the Midwifery Board or it's law or rules should be tabled until that review.

The Texas Midwifery Board should not be moved to the Department of Licensing and Regulation. DSHS is best equipped to regulate health care professions.

The move will eliminate rule-making authority of the Midwifery Board, an ability crucial to continually improving safety and maintaining best practice standards.

In the past, the Sunset Review Commission has rejected the idea of moving the Texas Midwifery Board to the Medical Board or the Board of Nursing. These are not viable alternatives since Licensed Midwives are not doctors, nurses, or physician assistants.

Any Alternative or New Recommendations on This Agency:

ACOG/TCOG have stated in their comments that there is a conflict of interest due to Licensed Midwives holding the majority on the Midwifery Board.

However, doctors hold the majority on the Medical Board and nurses hold the majority on the Board of Nursing.

During the last Sunset Review, it was the Sunset Review Commission that chose to give midwives a majority on the

Board since other Boards at DSHS and around the country have practitioners from that profession as the majority on the Board.

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.

No changes are currently needed to the Texas Midwifery Board and revisions should be discussed during the 2016-2017 review.

My Comment Will Be Made Public: I agree