

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 9:04:15 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 26, 2014 5:58 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 - 17:57

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Lauren

Last Name: Mulford

Title:

Organization you are affiliated with:

City: Sanger

State: Texas

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

Don't make any changes to the Midwifery Board until the Sunset Review in 2016. At that time, if any changes need to be made, review them then. Don't move the TX Midwifery Board to the Dpt of Licensing and Regulation. The Midwifery Board needs to have rule-making authority which will continue to allow improvement of safety and maintenance of best practice standards.

Midwives are not doctors, nurses, or PAs and do not belong under the Medical Board or the Board of Nursing.

Any Alternative or New Recommendations on This Agency:

Doctors hold the majority on the Medical Board and Nurses the majority on the Board of Nursing. Similarly, it is not a conflict of interest for Licensed Midwives to hold the majority of the Midwifery Board. To claim otherwise is just ridiculous and possibly even petty.

Texas has no "lay midwives" as all are required to meet a standard education as well as the NARM exam (350 questions, 8 hours!). This same exam is accredited by the same group that accredits ACME. If the NARM exam isn't good enough, then it follows that the ACME is also not good enough since the same group National Commission for Certifying Agencies. 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