

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 8:14:37 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Saturday, June 28, 2014 9:49 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Saturday, June 28, 2014 - 09:48

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Rachel

Last Name: Nehme

Title: Midwifery Care -- My Positive Experience

Organization you are affiliated with:

City: Austin

State: Texas

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

This past November, 2013, I had the extreme privilege of receiving my maternity care through my trained, licensed, and incredibly experienced midwife (who is also a nurse practitioner and RN). I had a very safe, healthy, and normal birth and I have nothing but incredibly positive feedback to share about my experience with midwives!

I firmly believe DSHS is best equipped to regulate health care professions such as midwifery care. Please do NOT move the Texas Midwifery Board to Department of Licensing and Regulation. This is in the best interest of mothers everywhere who desire professional and safe care from midwives for their pregnancies, birth, and postpartum experiences.

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.

COG/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.

My Comment Will Be Made Public: I agree