

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, July 01, 2014 7:53:06 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 30, 2014 9:43 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 30, 2014 - 21:43

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Alison

Last Name: Parnell

Title: Doctor of Physical Therapy

Organization you are affiliated with: NA

City: North Richland Hills

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: It is my understanding that the Texas Midwifery Board currently is regulated under the Department of State Health Services. As a medical professional, I find that is paramount that all fields that manage human health be regulated properly. The Department of Health Services is able to do this adequately for the Texas Midwifery Board. The Texas Midwifery Board should not be moved the Department of Licensing and Regulation since this would not allow the board to make the decisions required to continually improve safety and implement best practice standards. I had an excellent experience with outstanding care with a Licensed Midwife with my first child and would like to know that with my next child that I will receive that same high standard of care. There is no need to make changes with the Texas Midwifery Board since is not due for review until 2016-2017 and the board is not requiring any changes at this time. Any revisions needed will be best handled during 2016-2017 review.

Any Alternative or New Recommendations on This Agency: I have been made aware that the TCOG/ACOG have stated that there is a conflict of interest with Licensed Midwives holding the majority of the Midwifery Board. This should not be the case as doctors hold the majority on the Medical Board and nurses hold the majority on the Board of Nursing along with other Boards that have practitioners from that profession that have the majority. It does not appear to uncommon. Furthermore, the TCOG/ACOG also state that "lay midwives" should have to comply with the ACME standards and take the AMCB exam for certification. To the best of my knowledge, the Texas Midwifery Board already requires a standardized education for Licensed Midwives in addition to a NARM exam. NARM is accredited by the NCCA which also accredits the ACME. I had a birth that was in an out-of-hospital setting that was the best choice for my family and I. It was a decision that I did not take lightly and did extensive research on before making my choice. If the requirements recommended by the ACOG/TCOG mean that the it would cause many midwives to go out of business and reduce access to maternity care, then as woman, I am against these recommendations because it infringes upon my right to an out-of hospital experience for the birth of my children with a Licensed Midwife.

My Comment Will Be Made Public: I agree