

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, June 25, 2014 4:34:55 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 25, 2014 2:40 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 25, 2014 - 14:39

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Summer

Last Name: Richards

Title:

Organization you are affiliated with:

City: LONGVIEW

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: Because the Texas Midwifery Board is not due for a review until 2016-2017, any changes regarding the make-up of the Board (or its rules/laws) should be tabled until then. In addition, because there are health professionals in DSHS, DSHS is better equipped to hold midwives in TX to a higher level of excellence and evidence-based practices. As a mother who had a successful home-birth because of the choice I had to employ the services of a local, accredited midwife, I know first-hand that it is vital that midwives be given the opportunity to have high standards, because they are supporting mothers and newborns (just as OB/GYNs do in the hospitals).

Any Alternative or New Recommendations on This Agency: ACOG & TCOG have indicated that it is not good for midwives to hold a majority on the Midwifery Board, but doctors hold a majority on the Medical Board and nurses hold the majority on the Board of Nursing. It's not a conflict of interest - on the contrary, midwives know better than anyone else what is best practice for midwives, and are (and should be) seriously invested in the well-being of not only licensed midwives across the State of Texas, but also the families that they serve. ACOG & TCOG have also stated in their comments that midwives should be required to take the AMCB certification exam and comply with ACME standards - however, midwifery education is already standardized, and culminates in the NARM exam, which is accredited by the NCCA (the same organization that accredits ACME standards). The ACOG/TCOG recommendations are applicable only to nurse-midwives, who are not licensed to practice outside of a hospital setting. Changing this rule would put about 200 midwives across the state of Texas out of business, and reduce health-care options for thousands of families. As such, no changes are needed to the Texas Midwifery Board, and any revisions should be discussed during the impending 2016-2017 review.

My Comment Will Be Made Public: I agree