

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 26, 2014 8:45:35 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 25, 2014 9:55 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 - 21:55

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Cathy

Last Name: Rude

Title: CPM

Organization you are affiliated with: ATM

City: katy

State: Texas

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

I am very concerned about the plans to put the Texas Midwifery Board under a new licensing agency that does not appear to have any experience with Healthcare professionals. The DSHS obviously deals with several healthcare related groups as well it should and while I understand it is overwhelmed with its current load, I do not think the Midwifery Board should be one to be considered to lessen this load. There are only 219 midwives in Texas at this time versus almost 30,000 massaged therapists for example. I can see how moving this group and perhaps others could be a viable alternative. However, the Midwifery Board needs to stay under the umbrella of the DSHS. To move it would eliminate rule making authority of the Midwifery Board, which is crucial to safety and the ability to maintain best practice standards.

I am also very concerned about how this plan has proceeded and with so little warning it was even being considered. This is not right or fair for the consumers as well as the providers in Texas. The Midwifery Board is up for review by the Sunset Commission in 2016-2017. Any action concerning the makeup of the Board or its rules should be tabled until that time.

I have personally experienced exemplary care with midwives for myself and my babies and have been a midwife as well for the past 20 plus years. I want the option for out of hospital birth with midwives to continue to be a viable choice for the women and babies of Texas. I see these recommendations as a real threat to that freedom.

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