

**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 8:06:01 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Tuesday, June 24, 2014 5:04 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 24, 2014 - 17:04

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Jocelyn

Last Name: Sandruck

Title:

Organization you are affiliated with:

City: Colleyville

State: Texas

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

The Texas Midwife Board should not be moved to the Dept of Licensing and Regulation. The Department of State Health Services is where it should be kept to insure safety of the women Midwives serves.

The level of care I received during my pregnancy with a midwife far exceeded my expectations. I can see how the midwifery care coupled with 'general' OB practices could support each other and not make the service be either/or. There's opportunity for synergy. Moving the midwives to a licensing department would further divide these two practices.

Any Alternative or New Recommendations on This Agency:

ACOG/TCOG have stated in their comments that "lay midwives" should have to comply with ACME standards and take the AMCB exam for certification. The Texas Midwifery Board already requires standardized education for Licensed Midwives as well as the NARM 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