

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 8:02:41 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 24, 2014 8:35 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 - 20:34

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Ulrike

Last Name: Schmidt

Title: Home birther, mother, student midwife

Organization you are affiliated with:

City: Austin

State: Texas

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

i am a mother of two, and both of my girls were born into the hands of caring, licensed midwives. the right to birth how, with whom, and where a woman wants is a human right, and barring complications that would risk a mother or baby out, that right should be honored and upheld. Midwives in the state of Texas are trained and licensed. They are not "lay" midwives.

midwives are deeply, deeply invested in the health and well-being of women and babies. and it is this reverence that drives what they do: holding the most sacred of spaces for woman and child.

do not take this lightly. they don't.

any proposed changes to the midwifery board of texas would greatly change midwifery care in texas. their next sunset review is not until 2016-2017.

changes should be tabled until then.

DSHS is best able to oversee the midwifery board. midwives should maintain their rule making authority. this will insure safety and help to maintain best practice standards.

Any Alternative or New Recommendations on This Agency:

COG/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.

Thank you SO much for your consideration!

My Comment Will Be Made Public: I agree