

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 8:58:28 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 25, 2014 4:58 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 - 16:58

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Amy

Last Name: Sellers

Title:

Organization you are affiliated with: City of Kilgore

City: Kilgore

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: The Texas Midwifery Board is not due for Sunset Review until 2016-2017. Any changes to the make-up of the Midwifery Board or it's law or rules should be tabled until that review. The Texas Midwifery Board should not be moved to the Department of Licensing and Regulation. DSHS is best equipped to regulate health care professions. The move will eliminate rule-making authority of the Midwifery Board, an ability crucial to continually improving safety and maintaining best practice standards.

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. 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.

I personally have very unique circumstances that make homebirth the only possibility for me to continue having children. I have experienced the excellent care of a Licensed Midwife through 2 pregnancies and births, and one more is on the way. Without their care, our dream of having a large family would not have been possible. Please consider our requests carefully, as you have the ability to determine the fate of many lives. These lives form the foundation of our nation as a whole, as we sustain the sanctity of the family and practice our right to bear, nurture, and bring precious children into this world.

My Comment Will Be Made Public: I agree