

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, June 30, 2014 8:25:47 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Sunday, June 29, 2014 7:41 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Sunday, June 29, 2014 - 07:40

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Marni

Last Name: Smith

Title:

Organization you are affiliated with:

City: San Antonio

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I have sought the care of a Licensed Midwife through the birth of my 3 children. I could not have asked for better care throughout each pregnancy and birth. The Midwife's professionalism, scope of knowledge, experience, and care was outstanding. It has come to my attention that several changes are being reviewed with regards to the Texas Midwifery Board. Hence, I feel it necessary to comment here to preserve the wonderful right we parents have had to receive quality midwifery services. I understand the Texas Midwifery Board is not due for Sunset Review until 2016-2017. Please table any changes to the make-up of the Midwifery Board or it's law or rules until that review.

DSHS is best equipped to regulate health care professions, therefore the Texas Midwifery Board should not be moved to the Department of Licensing and Regulation. A move will eliminate Midwifery Board's rule-making authority, an ability crucial to continually improving safety and maintaining best practice standards. Additionally, moving the Texas Midwifery Board to the Medical Board or the Board of Nursing are not viable alternatives since Licensed Midwives are not doctors, nurses, or physician assistants. They are not medical professionals.

Any Alternative or New Recommendations on This Agency:

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. (Doctors hold the majority on the Medical Board and nurses hold the majority on the Board of Nursing) Now ACOG/TCOG states in their comments that there is a conflict of interest due to Licensed Midwives holding the majority on the Midwifery Board. .

ACOG/TCOG stated that "lay midwives" should have to comply with ACME standards and take the AMCB exam for certification. Licensed Midwives are not "lay midwives". 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. The Texas Midwifery Board has standardized education requirements 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 also accredits ACME. Implementing ACOG/TCOG recommended standards would put hundreds of midwives out of business, harming Texas' economy and reducing access to maternity care for myself and thousands of Texans. No changes are currently needed to the Texas Midwifery Board. Any revisions should be discussed during the 2016-2017 review.

My Comment Will Be Made Public: I agree