

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, June 24, 2014 3:38:32 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 24, 2014 3:18 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 - 15:17

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Melek

Last Name: Speros

Title:

Organization you are affiliated with:

City: Austin

State: Texas

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

I am writing to urge that the Texas Midwifery Board not be moved to the Texas Department of Licensing and Regulation. The Board is not due for Sunset Review until 2016-2017 and any changes to the makeup should be tabled until that review. Further, the Midwifery Board should not be moved from the DSHS, as this will eliminate its rule making authority and inhibit its ability to continue to improve safety and best practice standards.

I had wonderful, safe, and healthy birth experiences under the care of licensed midwives with my second and third pregnancies and I am concerned about the effect this decision would have. In the past, the Commission has declined to move the Midwifery Board to the Medical Board or the Board of Nursing, which is the right decision, as licensed midwives are neither nurses, doctors or physician assistants.

Any Alternative or New Recommendations on This Agency:

ACOG and TCOG's concern about Licensed Midwives holding the majority on the Midwifery Board is interesting, given that doctors hold the majority on the Medical Board and nurses hold the majority on the Board of Nursing. In fact, during the last review, the Sunset Commission was the one to give licensed midwives the majority on the Midwifery Board, given that other Boards at DSHS and around the country have providers from their specific profession as majorities on their board.

To clarify, licensed midwives in Texas are not "lay midwives." They must pass a 350 question, 8 hour standardized exam, given by NARM. NARM is accredited by the same commission which accredits ACME. Requiring licensed midwives in Texas to comply with requirements intended for nurse midwives who practice beyond the scope of Licensed Midwives, and which are not specialized for birth in an out-of-hospital setting is inappropriate. Implementation of these requirements would be detrimental to not only midwives, but to the families who seek their

care. It would hurt the Texas economy and reduce access to quality prenatal care and attendants who make birth safer for many women.

Please do not make any changes to the Texas Midwifery Board. Any revisions should be discussed during the 2016-2017 review.

My Comment Will Be Made Public: I agree