

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, June 27, 2014 9:06:16 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 26, 2014 3:19 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 26, 2014 - 15:18

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Elizabeth

Last Name: Spring

Title:

Organization you are affiliated with:

City: Cockrell Hill

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: Any changes made to the Midwifery Board or the Midwifery Laws or Rules should not proceed until the Texas Midwifery Board is due for review in 2016-2017. Any changes made before this may be considered unlawful.

Furthermore, moving the Texas Midwifery Board to the department of licensing and regulation will cause for a serious decline in the safety and structure that has been set in place. The department of licensing and regulation is not equipped to take on this task, it is certainly better being left under DSHS who is able to better regulate health-care professions. Lastly; Certified Professional Midwives are not doctors, nurses or physician's assistants, thus the Texas Midwifery Board should not be placed under the Medical Board or Board of Nursing- it does not apply to them, their practice guidelines, ethics, or scope of practice whatsoever.

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, this must not be a conflict of interest since it is the same in the Medical Board and the Board of Nursing.

The Texas Midwifery Board 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, which Licensed Midwives practice in-these should not apply to Licensed Midwives. Any changes to the Midwifery Board or Midwifery laws and regulations should be made ONLY at the 2016-2017 review.

Changes made prior to this are unlawful. Thank you!

My Comment Will Be Made Public: I agree