

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 8:46:21 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 25, 2014 9:18 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 - 21:17

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Elizabeth

Last Name: Tombs

Title: CNM

Organization you are affiliated with:

City: Lubbock

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 its 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.

In the past, the Sunset Review Commission has rejected the idea of moving the Texas Midwifery Board to the Medical Board or the Board of Nursing. These are not viable alternatives since Licensed Midwives are not doctors, nurses, or physician assistants

Any Alternative or New Recommendations on This Agency: CPMs are not "lay midwives" but rather, they are licensed by the state and have taken a national exam (NARM). They are experienced and provide a small but essential component to healthcare choice. Keeping choice is essential to women's rights on where and how to birth their newborn. CPMs and CNMs share our common midwifery knowledge and often work hand in hand to provide quality healthcare. Indeed, please refer to birth center research and you will find exceptional quality care being provided by midwives.

My Comment Will Be Made Public: I agree