

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, July 01, 2014 7:57:56 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 30, 2014 11:42 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 30, 2014 - 23:42

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Christina

Last Name: Verstrate

Title: Student Midwife

Organization you are affiliated with: Association of Texas Midwives

City: Cypress

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 laws or rules should be tabled until that review.

I have had the honor of witnessing licensed midwifery care on many occasions.

The personalized care licensed midwives provide has inspired me to become one and I am currently enrolled at an approved midwifery school here in Texas. From my experience working in the birth field for the past 7 years as a doula and birth assistant, I have seen the type of care women receive from midwives and doctors, as well as attended their births; at home, birth centers, and hospitals. What this has taught me is that every woman should be afforded the type of care that they desire for their birth. Doctors and hospitals have their place in birth, just like midwives do. Both professions should be working together for the benefit of the woman and her unborn child.

My understanding is that the Texas Midwifery Board is not due for its next Sunset Review until 2016-2017.

Whether the legislature is under pressure to review this early, or someone is pushing their own agenda, neither should be a factor in this review being conducted early, and it should be tabled until its originally scheduled time.

Transferring the Texas Midwifery Board over to the Department of Licensing and Regulation would take rule-making authority away from the Midwifery Board and would be detrimental to midwives and the women they serve. Best practice standards and safety would greatly suffer from this action, therefore it would put women and infant health and safety in jeopardy.

Licensed midwives are unique healthcare professionals, not able to be classified as doctors, nurses, or physician assistants. With this in mind, prior Sunset Reviews have declined to move the Midwifery Board to the Medical

Board or Nursing Board, but now it has been decided to move up the time schedule, and to a portion of the state government that is unable to provide the up-to-date changes necessary for proper care? This does not make any sense to me.

Any Alternative or New Recommendations on This Agency:

ACOG/TCOG has expressed their concern of midwives holding the majority on the Midwifery Board. It makes sense to have the majority of the Midwifery Board composed of midwives, seeing as that is the group with the best understanding of the needs of every midwife and every prospective client. Most professions with a governing agency are composed of a board heavily seated by those in that profession, so why should licensed midwives be any different? ACOG/TCOG have further gone on to comment that “Lay” midwives should have to comply with ASME standards and take the AMCB exam for certification. This shows their lack of understanding with what the current day, licensed midwife in the state of Texas consists of.

The Texas Midwifery Board already requires standardized education for licensed midwives as well as a requirement for midwives to obtain their CPM (Professional Midwife Certification) by sitting for the NARM (North American Registry of Midwives) Exam that consists of an 8-hour, 350-question comprehensive midwifery exam. Following through with the suggestions of ACOG/TCOG would not only put hundreds of licensed midwives out of business, harming the Texas economy, but would reduce access to maternity care for thousands of Texas women.

I implore you to please not make any changes to the Texas Midwifery Board at this time. Any and all revisions should be tabled until the 2016-2017 Review.

My Comment Will Be Made Public: I agree