

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 4:49:50 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 30, 2014 11:15 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 30, 2014 - 11:14

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Kimberly

Last Name: Walls

Title:

Organization you are affiliated with:

City: Tyler

State: Texas

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

I have experienced the skilled care of a Licensed Midwife through 8 pregnancies and births. The knowledge and wisdom of these caring individuals has been invaluable. Safety is always a number one priority in every birth, and excellent prenatal care and monitoring gives mothers the information needed to ensure the health of both mother and baby.

With this in mind I would recommend that the Midwifery Board should not be moved to the Department of Licensing and Regulation. Midwifery is involved in the healthcare of women and the DSHS is best equipped to regulate healthcare professions. It is important that the Midwifery Board maintain its rule making authority to ensure continually improved safety and practice standards among midwives.

Any Alternative or New Recommendations on This Agency:

It has been suggested by the ACOG/TCOG that "lay midwives" take the AMCB exam for certification. Licensed Midwives are not "lay midwives."

Licensed Midwives already have an extensive licensing procedure which includes standardized education as well as the NARM exam, which is a 350-question, eight-hour comprehensive midwifery exam that is accredited by the same agency that accredits the ACME (the National Commission for Certifying Agencies). A Licensed Midwife is specialize in providing care in an out-of-hospital setting which is not addressed in the requirements for a nurse midwife. These standards would put more than 200 midwives out of business thus harming the Texas economy and reducing access to maternity care for thousands of Texans.

No changes are needed to the Texas Midwifery Board and any proposed changes should be saved for discussion

during the already scheduled review in 2016-2017.

My Comment Will Be Made Public: I agree