

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, June 25, 2014 8:01:32 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 24, 2014 10:34 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 - 22:34

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Jessica

Last Name: Warren Blalock

Title:

Organization you are affiliated with:

City: Austin

State: Texas

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

I feel strongly that there are some illogical proposals on the table regarding the Texas Midwifery Board. These decisions are important to me because I have personally experienced the benefits of midwifery & value the current state of success the Texas Midwifery Board has found under DSHS jurisdiction that has helped create well regulated midwifery standards for the state of Texas. Because the Texas Midwifery Board is not due for Sunset Review until 2016-'17, I strongly feel that any changes to the Midwifery Board, it's law, or rules should be tabled until that review.

Furthermore, I think that the Texas Midwifery Board should not be moved to the Department of Licensing and Regulation. I think we can all agree that DSHS is best equipped to regulate health care professions, of which Midwifery is clearly a part of. The move will eliminate rule-making authority of the Midwifery Board, an ability crucial to continually improving safety and maintaining best practice standards.

Please note as well that the Sunset Review Commission has rejected the idea of moving the Texas Midwifery Board to the Medical Board or the Board of Nursing. I believe that these are not truly viable alternatives since Licensed Midwives are not doctors, nurses, or physician assistants.

Any Alternative or New Recommendations on This Agency:

It has been brought to my attention upon extensive research that ACOG/TCOG have stated in their comments that "lay midwives" should have to comply with ACME standards and take the AMCB exam for certification. It is important that it be recognized that Licensed Midwives are not "lay midwives". The definition of "layman" is "A person without professional or specialized knowledge in a particular subject." The Texas Midwifery Board already 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. If someone is licensed through the extensive standards set by a formal regulatory board such as The Texas Midwifery Board, how can it be implied by definition that a Licensed Midwife has no professional or specialized knowledge in the subject of birth and midwifery?

Furthermore, 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. Putting the recommended standards into place would put over 200 midwives out of business, harming Texas' economy and reducing access to maternity care for thousands of Texans.

Because of this, I FIRMLY believe that no changes are currently needed to the Texas Midwifery Board and revisions should be discussed during the 2016-2017 review.

My Comment Will Be Made Public: I agree