



**The American College of
Obstetricians and Gynecologists**
WOMEN'S HEALTH CARE PHYSICIANS

To the Members of the 407 Review Committee,

The Nebraska Section of the American College of Obstetricians and Gynecologists (Nebraska ACOG) appreciates the opportunity to provide comments regarding the proposed revisions to Nebraska's Certified Nurse-Midwife practice regulations.

Nebraska ACOG supports efforts to ensure that maternity care in Nebraska is safe, evidence based, and patient centered. We appreciate that the proposed framework clearly defines eligibility for low-risk pregnancies and establishes expectations for consultation, referral, and transfer of care when clinical circumstances warrant. These provisions promote patient safety while recognizing the importance of timely collaboration among members of the maternity care team.

Nationally, the American College of Obstetricians and Gynecologists supports team based maternity care. While ACOG does not advocate for statutory requirements for collaborative practice agreements, ACOG encourages the adoption of models of care that ensure team based collaboration. Additionally, ACOG recognizes that clinical responsibilities should be shared and delegated in accordance with each clinician's education, training, expertise, and scope of practice.

Nebraska continues to face significant challenges in providing timely access to maternity care, particularly in rural and underserved communities. Certified Nurse-Midwives are important members of the maternity care workforce and play a valuable role in providing care for individuals with low-risk pregnancies within collaborative systems of care.

We appreciate the thoughtful work of the 407 Review Committee and its commitment to ensuring that Nebraska's regulations reflect current evidence, promote patient safety, and support access to high quality maternity care for Nebraska families.

Sincerely,

Mary Kinyoun, MD

Chair, Nebraska Section

American College of Obstetricians and Gynecologists

