

Nebraska DHHS Division of Public Health
Credentialing Review Program
PO Box 95026
Lincoln, NE 68509

August 13, 2026

RE: Certified Nurse-Midwife Credentialing Review Proposal

Members of the Technical Review Committee

On behalf of CHI, we are pleased to offer our strong support for the Nebraska Certified Nurse-Midwives' Credentialing Review (407) Program application to modernize Certified Nurse-Midwife (CNM) practice in Nebraska.

CNMs are highly educated, nationally certified advanced practice registered nurses and essential members of Nebraska's maternal and women's health workforce. CHI supports policies that enable qualified health professionals to practice to the full extent of their education, training, certification, and licensure while maintaining strong standards for patient safety and professional accountability.

The proposed updates would strengthen access to high-quality care and help address persistent workforce challenges, particularly in rural and underserved communities. Modernizing CNM practice authority will allow healthcare organizations greater flexibility to deploy qualified clinicians where they are needed most while reducing unnecessary administrative barriers and aligning Nebraska law with contemporary models of care.

CHI also recognizes the application's thoughtful approach to patient safety and interdisciplinary collaboration. The proposed 2,000-hour transition-to-practice pathway, along with requirements for consultation, referral, transfer planning, and informed consent, provides appropriate safeguards while supporting CNMs' professional expertise. The defined criteria limiting planned out-of-hospital births to low-risk pregnancies further demonstrate a responsible approach to expanding access while prioritizing patient safety.

CNMs already work collaboratively with physicians, hospitals, nurses, and other healthcare professionals throughout Nebraska. These proposed changes appropriately preserve those relationships while recognizing CNMs' education, clinical competencies, and role in delivering high-quality maternal and women's healthcare.

For these reasons, CHI respectfully urges the Technical Review Committee to recommend approval of the Certified Nurse-Midwife Credentialing Review (407) Program application. We believe the proposed modernization will strengthen Nebraska's healthcare workforce, improve access to care, and support safe, coordinated, patient-centered services for women and families across the state.

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