



July 10, 2026

Nebraska Credentialing Review Program Technical Review Committee
Nebraska Department of Health and Human Services

Re: Support for the Certified Nurse-Midwife 407 Credentialing Review Application

Dear Members of the Technical Review Committee,

On behalf of the Nebraska Hospital Association (NHA), we appreciate the opportunity to provide comments in support of the Certified Nurse-Midwife (CNM) application currently under review through Nebraska's Credentialing Review (407) process.

Nebraska hospitals and health systems are committed to ensuring patients receive timely, high-quality care delivered by qualified healthcare professionals working as integrated members of multidisciplinary teams. Certified nurse-midwives are an established part of that model. Across Nebraska, CNMs provide obstetric and gynecologic services in hospitals, clinics, and affiliated outpatient settings while collaborating closely with physicians, nurses, and other members of the healthcare team.

The NHA's annual member survey consistently identifies workforce shortages as one of the most significant challenges facing Nebraska hospitals. Hospitals across the state continue to face persistent shortages of health care professionals, particularly in obstetrics, gynecology, and primary care. These challenges are especially acute in rural and underserved communities, where recruiting and retaining physicians and other clinicians remains difficult. Supporting evidence-based solutions that enable qualified health care professionals to practice to the full extent of their education and training is an important strategy for improving access to care and strengthening Nebraska's health care workforce.

The proposed statutory updates recognize the education, graduate preparation, national certification, and clinical competencies of certified nurse-midwives while bringing Nebraska law into closer alignment with contemporary standards of practice and the role certified nurse-midwives already serve within Nebraska hospitals and health systems. Updating statutes to reflect current models of care can reduce unnecessary administrative barriers and provide healthcare organizations with greater flexibility to deploy qualified clinicians where they are needed most. The proposal also supports coordinated systems of care by reinforcing the established consultation, referral, and transfer relationships that are essential to patient safety.

The NHA supports policies that strengthen Nebraska's healthcare workforce, improve access to care, and enable hospitals to deliver high-quality services efficiently while maintaining patient safety. We believe this proposal advances those objectives and respectfully encourage the Technical Review Committee to recommend approval of the application.

Thank you for your consideration and for your service throughout the credentialing review process.

Sincerely,

A handwritten signature in black ink, appearing to read "Meghan Chaffee". The signature is fluid and cursive, with the first name "Meghan" and last name "Chaffee" clearly distinguishable.

Meghan Chaffee
Chief Legal & Advocacy Officer
Nebraska Hospital Association