



Dear Technical Review Committee Members:

On behalf of Nebraska's Clinical Nurse Specialists, we are pleased to express our support for the Nebraska Certified Nurse-Midwives' Credentialing Review, commonly known as the 407 Review, and the proposed modernization of Nebraska's Certified Nurse-Midwife statutes.

Clinical Nurse Specialists and Certified Nurse-Midwives are two of the four recognized Advanced Practice Registered Nurse roles, along with Nurse Practitioners and Certified Registered Nurse Anesthetists. As APRNs, we share a commitment to ensuring that Nebraska's laws and regulations reflect contemporary education, national certification standards, evidence-based practice, and the full scope of professional preparation.

We support efforts to bring Nebraska's Certified Nurse-Midwife practice framework into closer alignment with the APRN Consensus Model, which was developed to promote greater consistency in APRN licensure, accreditation, certification, and education across states. Nebraska has made significant progress toward modernizing APRN practice, and we believe continued alignment with the Consensus Model strengthens the APRN workforce while maintaining appropriate standards for public protection.

Certified Nurse-Midwives are nationally certified, graduate-prepared APRNs whose education and certification establish competencies in the provision of comprehensive midwifery and reproductive health care. Statutory requirements that unnecessarily distinguish CNMs from other APRNs or impose restrictions inconsistent with their education, certification, and national standards can create barriers to practice without a corresponding benefit to patient safety.

We therefore support the Nebraska Certified Nurse-Midwives' 407 Review and its goal of establishing a modernized practice framework that more appropriately reflects the CNM role within the broader APRN profession. Increasing consistency among Nebraska's four APRN roles also supports regulatory clarity, workforce development, and access to high-quality health care, particularly in communities where access to maternity and reproductive health services may be limited.

Nebraska's Clinical Nurse Specialists appreciate the opportunity to support our Certified Nurse-Midwife colleagues and the continued advancement of APRN practice in Nebraska. We respectfully encourage favorable consideration of their 407 application and efforts to bring Nebraska law into greater alignment with the APRN Consensus Model.

Sincerely,

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