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May 8, 2026

Nebraska Department of Health and Human Services  
Division of Public Health  
Credentialing Review Program – 407 Process

Dear Members of the 407 Review Committee,

On behalf of the Nebraska Nurse Practitioners, I write in support of the Nebraska Certified Nurse-Midwives (CNMs) application for practice modernization. Certified Nurse Midwives are highly educated Advanced Practice Registered Nurses whose graduate education, national certification, and extensive clinical training fully prepare them to provide safe, evidence-based midwifery care.


CNMs complete accredited master's or doctoral programs that are integrated with comprehensive preparation in pregnancy, birth, postpartum, and newborn care. Their education includes extensive clinical experience across the full continuum of reproductive health, preparing them to manage physiologic care, recognize and respond to complications, and coordinate consultations or transfers when clinically indicated.

In addition, CNMs hold national certification through the American Midwifery Certification Board and maintain ongoing continuing education and recertification requirements. Their education explicitly prepares them to practice safely in all birth settings, including hospitals, birth centers, and planned out-of-hospital environments, with a strong emphasis on patient selection, informed consent, emergency preparedness, and continuity of care.

The proposed reforms do not expand CNM practice beyond their education or training. Rather, they modernize Nebraska's regulatory framework to align state statute with nationally recognized education, certification, and practice standards consistent with the APRN Consensus Model.

As professional peers, Nebraska Nurse Practitioners respectfully urge approval of the proposed scope of practice reforms and affirm Nebraska's commitment to evidence-based regulation and high-quality care.

Respectfully submitted,

  
[Diane Jackson, MS, APRN-FP \(May 11, 2026 15:47:38 CDT\)](#)  
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President, Nebraska Nurse Practitioners