



Nebraska Association of Nurse Anesthetists

Nebraska Department of Health and Human Services
Credentialing Review Program-407 Process
Division of Public Health
P.O. Box 95026
Lincoln, NE 68509

April 11, 2025

Re: Letter of Support for Nebraska Nurse Practitioners' Application to Expand Scope of Practice to Include Fluoroscopy

Dear Members of the Credentialing Review Committee,

I am writing this letter on behalf of the Nebraska Association of Nurse Anesthetists in support of Nebraska Nurse Practitioners' application to expand scope of practice to include fluoroscopy. Granting this privilege is a step forward in advancing patient care, improving access, and addressing critical workforce gaps in our healthcare system—particularly in rural and underserved areas of our state.

Nebraska Certified Registered Nurse Anesthetists (CRNAs) have been safely performing fluoroscopy and providing access to care in the state since the Certified Registered Nurse Anesthetists Practice Act (Nebraska Revised Statute 38-711) was revised in 2008 with LB 928 to include fluoroscopy in the CRNAs' performance of duties. To my knowledge, there have been no adverse events caused by CRNAs performing fluoroscopy.

Our support of this scope expansion comes after assessment of all six criteria for scope expansion included in the 407 review process.

Criteria 1: The health, safety and welfare of the public are inadequately addressed by the present scope of practice or limitation in the scope.

Nebraska is a predominately rural state, and access to care should be at the forefront of our minds. With a growing number of our society reaching older age, healthcare needs will continue to rise. Nurse Practitioners (NPs), trained in radiation safety, should be allowed to practice in accordance with their education and training. NPs have the potential to minimize patients' travel burden by streamlining patient care when fluoroscopic imaging is required.

Criteria 2: Enactment of the proposed change in scope of practice would benefit the health, safety, or welfare of the public.

Nebraska NPs should be permitted to practice fluoroscopy so Nebraska patients can receive timely care, close to home, as deemed necessary by trained professionals.

Additionally, Advanced Practice Registered Nurses desire the ability to practice to the full extent of their training. By limiting a profession's scope of practice, Nebraska runs the risk of losing healthcare providers to other states. This is of particular concern when neighboring states Iowa, Colorado, and Wyoming permit NPs to utilize fluoroscopy in their practice.

Criteria 3: The proposed change in scope of practice does not create significant new danger to the health, safety, or welfare of the public.

There is no reason to believe that NPs performing fluoroscopy after a radiation safety course would create a danger to patients nor healthcare personnel. Radiation safety courses provide additional education on minimizing harm to those in the vicinity of radiation. Other non-physician providers, such as CRNAs and Physician Assistants, have utilized fluoroscopy in Nebraska with no known adverse events.

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Criteria 4: The current education and training for the health profession adequately prepares practitioners to perform the new skill or service.

The Nebraska Nurse Practitioners propose a minimum of four hours post-graduate didactic education in fluoroscopy which includes: radiation safety, radiation production and characteristics, radiobiology, contrast media, and fluoroscopic unit operation. In addition, clinical training must include a minimum of five fluoroscopic procedures under the supervision of a formally trained preceptor.

Criteria 5: There are appropriate post-professional programs and competence assessment measures available to assure that the practitioner is competent to perform the new skill or service in a safe manner.

The Nebraska Nurse Practitioners propose initial clinical supervision and an additional one hour of continuing education in fluoroscopy with each license renewal.

Criteria 6: There are adequate measures to assess whether practitioners are competently performing the new skill or service and to take appropriate action if they are not performing appropriately.

After receiving education in fluoroscopy and radiation safety, the provider will be supervised by a formally trained preceptor, such as a medical physicist, radiologist, or other properly trained and licensed physician) for a minimum of five fluoroscopic procedures. I encourage the Nebraska Nurse Practitioners to have a clear plan in place to maintain oversight on the supervision process and steps taken should the need for remediation arise.

In closing, I urge the committee to approve this proposal and allow Nebraska Nurse Practitioners to pursue fluoroscopy privileges under clearly defined, evidence-based guidelines. This change represents a responsible expansion of practice that meets both patient need and safety standards.

Thank you for your thoughtful consideration.

Sincerely,

A handwritten signature in black ink that reads "Laura Fraynd, DNAP, CRNA". The signature is fluid and cursive, with the last name "Fraynd" being more prominent.

Laura Fraynd, DNAP, CRNA
President, Nebraska Association of Nurse Anesthetists