



Nebraska Association of Nurse Anesthetists

Nebraska Department of Health and Human Services
Division of Public Health
Credentialing Review Program
Attn: Technical Review Committee
P.O. Box 95026
Lincoln, NE 68509

July 28, 2026

RE: Support for the Certified Nurse-Midwife 407 Application

Dear Members of the Technical Review Committee:

On behalf of the Nebraska Association of Nurse Anesthetists (NANA), we are pleased to offer our strong support for the Nebraska Affiliate of the American College of Nurse-Midwives and its Credentialing Review (407) Program application to modernize Certified Nurse-Midwife (CNM) practice in Nebraska.

NANA represents Certified Registered Nurse Anesthetists (CRNAs) practicing across Nebraska. As a professional association representing advanced practice registered nurses (APRNs), we support regulatory frameworks that enable qualified APRNs to practice to the full extent of their graduate education, clinical preparation, national certification, and licensure while maintaining rigorous standards of professional accountability and patient safety.

CNMs are highly educated, nationally certified APRN professionals and essential members of Nebraska's maternal and women's healthcare workforce. Modernizing their practice authority will help Nebraska use its existing healthcare workforce more effectively, expand access to evidence-based care, and strengthen services for families, particularly in rural and underserved communities where maternity care options are increasingly limited.

The application offers a thoughtful and responsible approach. It establishes a 2,000-hour transition-to-practice pathway before a CNM may seek independent practice authority and preserves the consultation, referral, and transfer relationships that are fundamental to high-quality interdisciplinary care. It also includes specific informed consent and transfer planning requirements while limiting planned out-of-hospital birth attendance to defined low-risk pregnancies.

NANA contends that removing unnecessary practice barriers supports patient access, workforce sustainability, and sound health policy. The proposed changes appropriately recognize CNMs' expertise and better align Nebraska law with contemporary APRN practice and healthcare delivery.

For these reasons, NANA respectfully urges the Technical Review Committee to support the Certified Nurse-Midwife Credentialing Review (407) Program application.

Thank you for your consideration and for your service to the people of Nebraska.

Sincerely,

A handwritten signature in blue ink that reads "Laura Fraynd, CRNA". The signature is written in a cursive, flowing style.

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