

April 9, 2025

To Whom it May Concern:

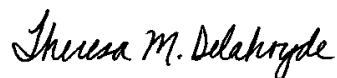
The Nebraska Board of Nursing would like to enter a letter of neutrality for the Credentialing Review proposal for Advance Practice Registered Nurses – Nurse Practitioners (APRN-NPs) to provide fluoroscopy in Nebraska. While the Board conceptually believes that the APRN-NP should be able to provide fluoroscopy, it has concerns about the proposal in the following areas:

- 1) Why does the NP applicant group believe they should be included in 38-1905, the 'Licensed practitioner, defined.' section, of the Medical Radiography Practice Act as opposed to a separate carve out pathway, such as the one utilized by the APRN- CRNAs?
- 2) The addition of the APRN-NP to the definition of Licensed Practitioner in 38-1905, adds the APRN-NP to an exempt group of individual professionals. 38-1920 (3) exempts such practitioners "from the rules and regulations of the department pertaining to the qualification of persons for the use of X-ray radiation-generating equipment operated for diagnostic purposes." How does the addition of your group of providers to this section protect the public?
- 3) Should the APRN-NPs be included in 38-1905 - what specific training, education, or certification requirements will be required of the APRN-NP in addition to standard NP education in order to add and to safely provide fluoroscopy to Nebraska NP practices?

One has to consider the history of APRN-NPs in Nebraska and the greater than 40-year process that has led to today's independent practice. The goal to provide primary care to all Nebraskans was realized in 2015 with the passage of LB107. The veteran NPs' that worked tirelessly to educate and enact legislation to create the current independent practice environment, never envisioned the direction where current practice is moving.

The Board of Nursing has witnessed the migration of the APRN-NP practice in Nebraska into settings that are pushing the limits of necessary health care practices and medical care. The current development and expansion of what are considered 'alternative, regenerative, or functional' medicine practices not only call into question medical necessity, but also safe, effective, ethical medical practices. These cash driven treatments are changing the landscape of the original intent of APRN practice. The introduction of fluoroscopy for all APRN-NPs has the potential to create unknown utilization and outcomes. For these reasons, the Board of Nursing has grave concerns about protection of the public in this state and is proclaiming neutrality for the Credentialing Review proposal for APRN-NPs to provide fluoroscopy in Nebraska.

Sincerely,



Theresa Delahoyde EdD, RN, CNE
President, Nebraska Board of Nursing