



[External] CRNA Proposed Rulemaking

From Minzola, Debra J. <djminzola@geisinger.edu>
Date Thu 7/24/2025 10:02 AM
To ST, RegulatoryCounsel <RA-STRegulatoryCounsel@pa.gov>

1 attachment (44 KB)
Regulatory Council letter from PANA President.pdf;

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Please see the attached.

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July 24, 2025

Regulatory Counsel
State Board of Nursing
P.O. Box 69523
Harrisburg, PA 17106-9523,

re.: 16A-5145 (CRNA)

To Whom It May Concern:

On behalf of the Pennsylvania Association of Nurse Anesthetists (PANA), which represents approximately 4,000 certified registered nurse anesthetists (CRNAs) and student registered nurse anesthetists (SRNAs) in the commonwealth, I write in support of the State Board of Nursing's proposed rulemaking, which fully recognizes and licenses CRNAs as intended under Act 60 of 2021. The rulemaking solidifies the scope of practice for these highly trained, advanced professionals to administer anesthesia in cooperation with and under the overall direction of licensed physicians, podiatrists, and dentists, while setting licensing fees and certification standards.

These regulations will have an immediate impact on Pennsylvania and how anesthesia is delivered in the commonwealth. CRNAs are recognized as the hands-on providers of anesthesia care, practicing in every setting where anesthesia is administered, including hospital operating and delivery rooms; ambulatory surgical centers; the offices of physicians, dentists, podiatrists, ophthalmologists, and plastic surgeons; and pain management centers. CRNAs deliver exceptional care to patients who rely on them during their most vulnerable moments.

Administering anesthetics when and where patients need it most, the unique expertise of CRNAs helps to strengthen our health-care delivery model and ensure communities stay healthy and safe through access to high-quality care. For example, CRNAs – not physician anesthesiologists – remain the primary providers of anesthesia care in rural America, enabling health-care facilities in these medically underserved areas to offer obstetrical, surgical, pain management, trauma stabilization, and other services. Without CRNAs, facilities in rural areas and medically underserved communities would not be able to maintain these services, forcing many rural Americans to travel long distances for care.

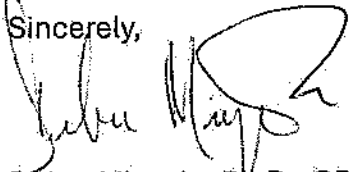
These regulations also underscore and validate what we already know: Because of their training and experience, numerous medical studies show there is no statistical difference in patient outcomes when a nurse anesthetist provides treatment. In fact, these studies by nationally recognized health-care policy and research organizations prove that CRNAs provide high-quality care, even for rare and difficult procedures. As health-care demands continue to grow, increasing the number of CRNAs will be key to containing costs while maintaining quality care. Managed care plans recognize CRNAs for providing high-quality

anesthesia care with reduced expense to patients and insurance companies. The Federal Trade Commission has even cautioned states against policies that restrict advanced-practice nurses' work. Pennsylvania is making the right move with this rulemaking.

CRNAs pride themselves on rigorous education and training standards. These regulations recognize the commitment each individual puts into their profession to provide the highest level of care. When you combine the clinical critical care registered nurses experience required to enter CRNA training, the clinical experience obtained in an undergraduate nursing curriculum, and the clinical anesthesia training in a nurse anesthetist program, the average nurse anesthetist completes 9,000 clinical hours. CRNAs must have a bachelor's degree, be a registered nurse, and have at least one year of acute care nursing experience prior to entering nurse anesthesia educational programs – in other words, they learn to assess and treat a broad range of health problems before even beginning anesthesia training. To keep up with evolving care standards, continuing education is important. Not only are CRNAs required to be nationally certified, but they also must be recertified every four years, which these regulations maintain.

We truly appreciate all the time and effort the State Board of Nursing and stakeholders put into developing this proposed rulemaking. These regulations will enhance the profession of nurse anesthesia, ensure Pennsylvanians continue to receive the highest level of care when and where they need it most, and establish clear guidance for providers. Once again, on behalf of PANA and the thousands of CRNAs and SRNAs that we represent, we fully support the rulemaking [16A-5145 (CRNA)] as proposed. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra Minzola", written over a white background.

Debra Minzola, Ph.D., CRNA, President
Pennsylvania Association of Nurse Anesthetists