

**[External] CRNA PROPOSED RULEMAKING**

From Sarah Trau <sarahtrau22@gmail.com>
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To ST, RegulatoryCounsel <RA-STRegulatoryCounsel@pa.gov>

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To Whom It May Concern:

I am writing in response to the State Board of Nursing's proposed rule-making, 16A-5145 (CRNA).

My name is Sarah Trau, and I have been a registered nurse in the state of Pennsylvania since 2007, having earned my degree from Penn State University. Born and raised in Pennsylvania, I take great pride in the education I received here and in continuing to serve my home state. After working as a nurse in Pittsburgh for five years, I began my Master of Science in Nursing – Nurse Anesthesia program at La Roche College through Allegheny General Hospital. I have now been a Certified Registered Nurse Anesthetist (CRNA) for 10 years and currently practice full-time at St. Clair Hospital in Pittsburgh.

In my daily practice, I work clinically in the operating room providing anesthesia across a wide range of surgical specialties. I take a 24-hour call shift every week, during which I work in a care team model with an anesthesiologist. During off-hours and weekends, the two of us function independently, and I am often the only CRNA providing anesthesia coverage in the hospital. On any given day, I may deliver anesthesia care to over 20 patients. I routinely care for complex cases including cardiac anesthesia for open-heart surgery, obstetric anesthesia to support labor and delivery, and patients across all major surgical specialties.

This proposed rulemaking finally recognizes and licenses CRNAs as intended under Act 60 of 2021. It affirms our scope of practice—to administer anesthesia in cooperation with and under the overall direction of licensed physicians, podiatrists, and dentists—while also establishing appropriate licensing fees and certification standards.

- CRNAs are nationally certified and trained to provide anesthesia services independently. Across the country, CRNAs are recognized as advanced practice providers (APRNs), empowered to practice to the full extent of their education and training. Unfortunately, Pennsylvania remains behind the national standard, and this rulemaking is essential to modernize our state's recognition of CRNAs' expertise and role in patient care.
- Our education and clinical training are rigorous. During my two years of training in Pittsburgh, I completed over 1,000 clinical hours, preparing me to safely care for patients in high-stakes, fast-paced surgical environments. These regulations acknowledge the extensive preparation that CRNAs undergo to ensure safe, high-quality care.
- Numerous peer-reviewed studies show there is no statistical difference in outcomes when anesthesia is provided by CRNAs versus other providers. Nationally respected healthcare research organizations continue to affirm the safety and quality of anesthesia care delivered by CRNAs—even in complex and emergent cases.
- Pennsylvania is home to 15 top-tier nurse anesthetist programs and continues to be a national leader in CRNA education. These regulations reinforce the value of that education and the highly skilled professionals who serve our communities.
- In today's evolving healthcare environment, patients want high-quality, cost-effective, and personalized care. CRNAs deliver on all three by staying with our patients throughout their procedures, managing every aspect of their care—physically, emotionally, and mentally.

Given the scope, responsibility, and level of care we provide, it is vital that Pennsylvania's regulations reflect the current realities of CRNA practice. For all these reasons, I urge support for the proposed rulemaking. Thank you for your time, attention, and commitment to recognizing the role of CRNAs in Pennsylvania's healthcare system.

Sincerely,

Sarah Trau, CRNA, MS

St. Clair Hospital

Pittsburgh, PA