



 Outlook

[External] CRNA proposed ruling 16A-5145 (CRNA)

From Suzanne Morrison <srm77@icloud.com>
Date Wed 7/23/2025 6:22 PM
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 rulemaking, 16A-5145 (CRNA).

I am a CRNA who has practiced solely in the state of Pennsylvania for my entire career. I graduated from West Penn Nursing School in Pittsburgh, PA in 1986 and have continued to advance my education throughout my career. I graduated with my MSN in nurse anesthesia in 2005 from Hamot School of Anesthesia in Erie, PA. In 2013, I completed my DNP at the University of Pittsburgh. In addition to my clinical practice, I have held positions of leadership as Chief and have also served as full-time faculty at a nationally recognized institution. Nurse anesthesia's foundation is deeply rooted within the state of Pennsylvania with Sister Mary Bernard being the first nurse to practice the specialty of anesthesia in 1877.

This rulemaking finally recognizes and licenses CRNAs as intended under Act 60 of 2021. The rulemaking solidifies the scope of practice for CRNAs to administer anesthesia in cooperation with and under the overall direction of licensed physicians, podiatrists, and dentists, while setting licensing fees and certification standards.

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.

Both the 2004 Standards and PDS require that the nurse anesthesia clinical curriculum prepares the student for the full scope of current practice in a variety of work settings and requires a minimum of 600 clinical cases and 2000 clinical hours including a variety of procedures, techniques, and specialty practice (ref. 2004 Standards – Standard III, Criterion C18 and PDS Standard E.2.3, as well as the Appendices of the Standards). The case requirements defined in the Appendices of the 2004 and PDS Standards identify mandatory minimums as well as preferred case numbers. While all students must meet the minimum case requirements in order to be eligible for the National Board of Certification and Recertification for Nurse Anesthetists (NBCRNA) National Certification Examination, normally students exceed the minimums in various categories during their clinical rotations.

Pennsylvania is among the top draws nationally for CRNA students, with 15 highly rated nurse anesthetist programs operating across the commonwealth. With these regulations, Pennsylvania is doing the right thing by strengthening existing CRNA programs and supporting the highly qualified professionals these programs produce.

In today's changing health-care environment, patients want health care delivered with personal care, at a lower cost, with a high degree of confidence. CRNAs deliver all of these by staying with their patients throughout the entire procedure and ensuring that the whole of the patient is cared for --- physically, mentally and emotionally.

For all these reasons, I urge support for the proposed rulemaking. I appreciate all the work that has gone into finally giving CRNAs the recognition they deserve. Thank you for your time and attention to this matter.

Sincerely,
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