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[External] CRNA Proposed Rulemaking

From TD C <carnahantd@gmail.com>
Date Mon 7/21/2025 4:46 PM
To ST, RegulatoryCounsel <RA-STRegulatoryCounsel@pa.gov>

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CRNA Proposed Rulemaking

To Whom It May Concern,

I am writing in response to the State Board of Nursing proposed rulemaking **16A-5145 (CRNA)**. I am a Certified Registered Nurse Anesthetist, educator, business owner, and board member who has been practicing for the entirety of my 6-year career as a CRNA in the state of Pennsylvania, in and around the Philadelphia area. Allow me to tell you why this rulemaking is so important for our profession:

This will finally recognize and license CRNAs as has been intended under Act 60 of 2021. This solidifies the scope of practice for CRNAs to administer anesthesia both in cooperation with and under the direction of licensed physicians, podiatrists, and dentists, while setting standards for certification and licensing fees.

CRNAs pride themselves on the quality and safety of the care that we provide which is reflective of our rigorous education and training standards. My doctoral training comprised 3 years of intense clinical and didactic education in Philadelphia at the University of Pennsylvania, where I provided *THOUSANDS* of hours of hands-on anesthesia care to Pennsylvania citizens across the lifespan continuum and in every surgical and anesthetizing location; this included operating rooms, labor and delivery suites, outpatient surgery, and trauma bays. These regulations recognize the commitment that each CRNA has invested into providing the highest level of anesthesia care.

Because of that training and experience, CRNAs have been validated in numerous peer-reviewed academic studies to demonstrate *NO DIFFERENCE* in patient outcomes when providing anesthesia care. This data is supported among nationally-recognized health policy and research organizations, even for rare and difficult procedures. Across the commonwealth and in a variety of practice environments and surgical settings, CRNAs provide the majority of anesthesia - serving citizens, Veterans, and rural healthcare.

In today's changing healthcare environment, patients want personalized care delivered at a lower cost and with a high degree of confidence. CRNAs deliver all of that, maintaining cost-effective, evidence-based, personalized care throughout each surgical procedure, where they are at the head of the bed for every breath and every beat, ensuring safe patient outcomes for the physical, mental, and emotional components of preoperative care.

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

Sincerely,
Thomas D. Carnahan IV, DNP, CRNA
Sandman Slumber Services, LLC