



 Outlook

[External] CRNA Proposed Rulemaking, 16A-5145 (CRNA)

From Peggy Blankenship <Peggy@assnoffices.com>
Date Mon 7/28/2025 1:06 PM
To ST, RegulatoryCounsel <RA-STRegulatoryCounsel@pa.gov>

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

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

re.: 16A-5145 (CRNA)

To Whom It May Concern:

Pennsylvania is among the top draws nationally for certified registered nurse anesthetist (CRNA) students, with 15 highly rated nurse anesthetist programs operating across the commonwealth. Yet, for many years, the students who graduated from our programs were recognized only as Registered Nurses, at least within the commonwealth. Pennsylvania had been one of just two states that failed to recognize "certified registered nurse anesthetist" in some form. Act 60 of 2021 changed that, finally granting professional recognition to CRNAs for their advanced education, specialized training, and clinical skills.

The State Board of Nursing's proposed rulemaking [16A-5145 (CRNA)] puts into practice the intent of Act 60 and formally establishes professional designation and certification standards, among other things, for CRNAs. As part of the contingent of nurse anesthetist programs operating within the commonwealth, we come together to fully endorse and support the proposed rulemaking and urge swift approval.

These regulations will have an immediate effect on the profession by solidifying the state's position as the top destination for nurse anesthesia education and creating a new incentive for the students we educate and train to stay and practice here. Again, before Act 60, some students took their talents to other states that recognized CRNAs professionally, even though they may have had to wait as long as six months to become credentialed, delaying their ability to work. Now, we can reverse that "brain drain" by ensuring our commonwealth remains an attractive place not only to get an education, but to stay and build a career in nurse anesthesia and to be recognized for the education and training they achieved.

Retention of these advanced professionals in Pennsylvania should be a priority for our commonwealth because of the outstanding health services they provide, thus improving the health and welfare of all residents. With these regulations, Pennsylvania is doing the right thing by strengthening existing CRNA programs and supporting the highly qualified professionals these programs produce.

We teach our students that anesthesia outcomes are affected by factors such as provider vigilance, attention, concentration, and organization and we require that they engage in rigorous training to meet these goals. In fact, the average nurse anesthetist completes 9,000 hours of clinical training, including the clinical ICU experience as a registered nurse required to enter CRNA training, the clinical experience obtained in an undergraduate nursing curriculum, and the clinical anesthesia training in a nurse anesthesia program. This amount of educational and practical experience supports the conclusion by many studies that there is no difference in patient outcomes when a nurse anesthetist provides treatment compared to a physician anesthesiologist. In fact, these studies by nationally recognized health-care policy and research organizations indicate that CRNAs are competent to provide high-quality care, even for rare and difficult procedures.

As educators, we do all we can to turn out the highest caliber of candidates who will work to ensure access to safe, effective, efficient, affordable, compassionate care. We are grateful that the commonwealth finally recognizes CRNAs for the advanced professionals they are. We appreciate that the State Board of Nursing has developed a comprehensive proposed rulemaking that considers the high level of education and training our students must attain and that CRNAs must continue to meet to practice.

Pennsylvania's nurse anesthetist programs work collectively to ensure our students are the best and the brightest. These regulations celebrate their achievements, incentivize them to remain in the commonwealth after they graduate, and enhance the entire profession for the benefit of any patient who needs anesthesia care. For all these reasons, we once again offer our support for this rulemaking and urge swift approval. Thank you.

Sincerely,

- Allegheny School of Anesthesia / Duquesne University
- Cedar Crest College Nurse Anesthesia Program

- Drexel University Nurse Anesthesia Program
- Geisinger Health System / Bloomsburg University of Pa. Nurse Anesthesia
 - Independence Health System School of Anesthesia at Saint Vincent College
 - LaRoche University Doctor of Nurse Anesthesia Program
 - La Salle University Nurse Anesthesia Program
- St. Luke's University Health Network/DeSales University Nurse Anesthesia Program
 - Thomas Jefferson University, Jefferson School of Nursing, Nurse Anesthesia Program
- University of Pennsylvania School of Nursing Nurse Anesthesia Program
- University of Scranton School of Nurse Anesthesia
- UPMC Hamot School of Anesthesia / Gannon University
- Villanova Doctorate Nurse Anesthesia Program
- York College of Pennsylvania / WellSpan Health Nurse Anesthetist Program