



Outlook

[External] CRNA proposed rule-making 16A-5145

From Pam Wroblewski <pam@bpwpc.net>  
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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 rulemaking, 16A-5145 (CRNA).

I have been a CRNA working in PA for over 35 years and have been the owner of a large CRNA group practice since 1995, which employs over 50 CRNAs. Our staff provides anesthesia services under the direction of the operating surgeon at over 6 surgery centers, 2 community hospitals, and several offices locations. Without our staff, it would be extremely difficult for many seniors and pediatric patients to access care, many who are Medicare or Medical Assistance patients. Our group was one of the first CRNA-owned groups in PA, which participated with and billed insurers directly.

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.

We CRNAs pride ourselves on rigorous education and training standards. These regulations recognize the commitment each individual puts into their profession to provide the highest level of patient care possible. After I completed nursing school and received my bachelors degree, I worked as a critical care nurse for over 3 years. I completed a demanding nurse anesthesia program with over 1500 cases along with much more than the required hours and later obtained my masters degree. While working as a CRNA, I completed a doctorate in nurse anesthesia practice from St. Vincent University. All of our staff, have advanced graduate degrees along with many years of clinical experience.

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. Our group safely performs over 15,000 anesthetics per year while working at the top of our license in cooperation with a physician, podiatrist or dentist for many different specialties.

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. Our group works with students from 4 different anesthesia programs to help to educate future CRNAs. We pride ourselves in mentoring future leaders, practitioners and educators.

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 patient is cared for in all aspects.

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,  
Pam Wroblewski, DNAP, MPM, RN, CRNA, CASC

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