



Original: 2505

**PENNSYLVANIA ASSOCIATION OF NURSE ANESTHETISTS**

234 NORTH THIRD STREET • HARRISBURG, PA 17101  
(800) 495-7262 • FAX (717) 909-9563 • EMAIL: info@pana.org • www.pana.org

**SENT VIA FACSIMILE—HARD COPY TO FOLLOW**

November 28<sup>th</sup> 2005

Gerald S. Smith  
Board Counsel, Pennsylvania State Board of Medicine  
P. O. Box 2649  
Harrisburg, PA 17105-2649

RECEIVED  
2005 DEC -9 AM 11:03  
REGULATORY  
AND REVIEW COMMISSION

Dear Mr. Smith:

I am responding to the request for comments on the proposed changes to **STATE BOARD OF MEDICINE: [49 PA. CODE CHS. 16 AND 18] Physician Assistants [35 Pa.B. 6127]**. The section of particular concern to the safety of the citizens within the Commonwealth is 18.145, which may be interpreted to delegate authority to Pennsylvania's Physician Assistants to administer general anesthetic agents. It is imperative that the Board of Medicine clarify this scope of practice issue. Without rigorous specialty education and clinical training specific to anesthetic practice, this would pose an egregious patient safety issue.

I realize that this may not be the intent of these proposed changes. I am requesting however that the language be changed to clarify the limitations of Physician Assistant scope of practice, specific to the administration of general anesthetic agents.

Sincerely yours,

*Arthur J. Zwerling*, MS, MSN, CRNA, FAAPM

Arthur J. Zwerling, MS, MSN, CRNA, FAAPM  
Vice President Pennsylvania Association of Nurse Anesthetists