



PENNSYLVANIA ASSOCIATION OF NURSE ANESTHETISTS

January 12, 2009

2729

Ann Steffanic
Administrator, State Board of Nursing
P.O. Box 2649
Harrisburg, Pennsylvania 17105-2649

Dear Ms. Steffanic:

As President of the Pennsylvania Association of Nurse Anesthetists (PANA), I would like to comment on the proposed regulation 16A-5124. I would also like to address the comments made by Dr. Joseph Galassi (PSA President) in a letter to you dated December 3, 2008.

The Pennsylvania Association of Nurse Anesthetists is in full support of the State Board of Nursing, Regulation 16A-5124. I offer any assistance PANA may provide to ensure the State Board's success in passing this regulation. As a CRNA who has been successful at maintaining independence in a field controlled by physicians, I can truly appreciate the countless hours and dedication required to obtain the necessary regulatory language.

Dr. Joseph Galassi stated that Nurse Anesthetists wanted to "expand" their scope of practice in HB 1256 with language that would allow a CRNA to work under collaboration with non-anesthesiologists. This reflects a gross misunderstanding of what the CRNAs scope of practice is and has been for more than 150 years. CRNAs across the state work with non-anesthesiologists in hospital, ASFs, ASCs, and office based practices. In fact, **Fulton County Medical Center**, McConnellsburg, Pennsylvania, employees only CRNAs, operating completely independently of anesthesiologist. I myself have owned a business for more than nine years during which we work daily with out anesthesiologist supervision. I am successfully reimbursed for my services directly from insurance providers. **PA Code Title 28, 123.5 and PA Code Title 28, 555.32** of the Department of Health regulations legally defines this aspect of a CRNAs scope of practice. It is further clarified in our Nursing Board regulation **PA Code 28, 21:17**.

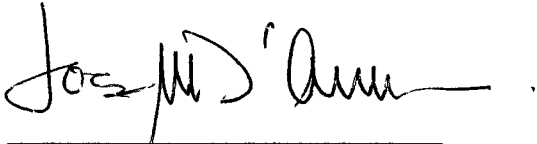
We have a severe shortage of CRNAs in this state. As quoted in the D.O.H. State Health Improvement Whitepaper; **"THE NURSE WORKFORCE IN PENNSYLVANIA 2004,"** by 2010, the shortage will grow to 17,000 (14%) and in 2020, it will be over 40,000 (30%). As the President, I am facing an incredible challenge in motivating our CNRAs to stay. Pennsylvania is the epi center for CRNA education in the country with almost 17 schools. We have the largest SRNA representation (550 students) and also the largest shortage of CRNAs than any other state. The majority of states have a 10% shortage of CRNA providers. Pennsylvania surpasses this number at astounding 14%.

Among the major reasons for this shortage is the fact that we are one of the few states that does not recognize the CRNA as an advanced practice. All of our border states, except New York, have an advanced practice license for CRNAs and their scope of practice is secured with a law instead of a regulation by their State Board of Nursing. If the State Board of Nursing does not stand behind their advanced practices, Pennsylvania will continue to lose its best and brightest to our neighbors.

The Pennsylvania Association of Nurse Anesthetists stands ready to support their fellow colleague CRNPs in any way we can to maintain the future of advanced practices in nursing.

If I can be of any help please email or call our office. The Pennsylvania Association of Nurse Anesthetists looks forward to assist in any way we can to further the cause of nursing in Pennsylvania.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph D'Amico", with a horizontal line underneath.

Joseph D'Amico, CRNA, Ph.D.

President

Pennsylvania Association of Nurse Anesthetist

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