

## **28 Pa. Code §555.32 (a) Administration of Anesthesia**

### **Approved Expedited Exception**

The Department permits students enrolled in Council on Accreditation of Nurse Anesthesia Programs (COA) accredited nurse anesthetist programs to administer anesthesia in PA Class B or Class C licensed ambulatory surgical facilities (ASFs).

### **Clinical evidence/support for this exception**

Supervised training in clinical settings is an integral part of the education of students in healthcare disciplines. The Department's current hospital regulations permit administration of anesthesia by nurse trainees enrolled in a course approved by the American Association of Nurse Anesthetists. There is currently no such provision in the department's regulations for ASFs. This exception is offered in support of the Commonwealth's need for an adequate and appropriately trained healthcare workforce.

Accreditation is a peer process whereby a private, nongovernmental agency grants public recognition to an institution or specialized program that meets or exceeds nationally established standards of acceptable educational quality.

There are 13 nurse anesthesia educational programs located in PA and all are currently accredited by the Council on Accreditation of Nurse Anesthesia Programs (COA), which accredits nurse anesthesia programs based on nationally established standards of academic quality. The Council is a nationally recognized accrediting agency for the accreditation of institutions (institutional accreditation) and programs (programmatic accreditation) of nurse anesthesia within the United States, its territories and protectorates, at the post-master's certificate, master's or doctoral degree levels, including programs offering distance education. COA's Standards for Accreditation of Nurse Anesthesia Educational Programs contain essential requirements for accredited nurse anesthesia programs related to governance, resources, program of study, program effectiveness, and accountability.

Accreditation standards require that programs submit an affiliation agreement with every clinical facility and a clinical site application for COA approval prior to sending students to that facility. COA standards also restrict clinical supervision of students in anesthetizing areas to Certified Registered Nurse Anesthetists (CRNAs) and/or anesthesiologists with institutional staff privileges who are immediately available in all clinical areas, and prohibit instruction by graduate registered nurse anesthetists or resident physicians if they act as the sole agents responsible for the student.

Regulations of the PA State Board of Nursing require that CRNAs practice in cooperation with a surgeon or dentist. The nurse anesthetist's performance shall be under the overall direction of the chief or director of anesthesia services, if such exists.



COA standards require the program to ensure that students and CRNA faculty including clinical instructors are currently licensed as registered professional nurses in one jurisdiction of the United States and CRNAs are certified/recertified by the Council on Certification/Recertification of Nurse Anesthetists.

There is no need for government intervention to assure quality standards for education of nurse anesthesia students.

Requirements for this exception are focused on carrying out the Department's duty to safeguard the public and setting standards for the quality of care delivered by licensed facilities.

Nothing in this exception is intended to prevent PA licensed ASFs from offering clinical learning opportunities to students from COA accredited nurse anesthesia schools located outside of the Commonwealth of PA.

#### **Minimum requirements for this exception**

- The student registered nurse anesthetist (SRNA) must be enrolled in an educational program of a school for nurse anesthetists accredited by the Council on Accreditation of Nurse Anesthesia Programs (COA), as approved by the State Board of Nursing under 49 Pa. Code §21.17.
- The SNRA must have completed 6 months SRNA clinical experience in an acute care setting.
- A CRNA or anesthesiologist must provide 1:1 clinical supervision of the SRNA.
- The ASF is licensed by the Department as either a Class B or Class C ASF.
- The ASF shall enter into an affiliation agreement with the school at which the SRNA is enrolled that shall set forth the terms and conditions of the nurse anesthetist student clinical training in the ASF.
- Clinical supervision shall be provided by either a CRNA certified by the Council on Certification/Recertification of Nurse Anesthetists who holds a current PA nursing license or a PA licensed physician credentialed to provide anesthesia services.
- CRNAs providing clinical supervision of a nurse anesthesia student must practice in accordance with 49 Pa. Code § 21.17. Anesthesia.
- The ASF and the student's school shall jointly determine those procedures in which SRNAs may be involved. The manner in which those procedures are identified shall be defined in the affiliation agreement between the ASF and the school.
- The ASF shall verify that all SRNAs have current professional liability insurance prior to initiation of their student experience in the ASF.
- The patient shall be informed that a SRNA will be involved in the procedure and the exact role of the SRNA in the administration, monitoring, etc. of anesthesia to be administered to the patient.

#### **Documentation to be provided to the Dept by the facility**

- 1) The signed affiliation agreement between the facility and the nurse anesthesia education program or school setting forth the terms and conditions of student clinical training in that



facility. If the affiliation agreement is an umbrella agreement covering multiple sites within a healthcare system, it must specifically name the ASF as a clinical teaching site.

- 2) Evidence of the education program's/school's current valid COA accreditation.

Exceptions granted by the Department address the state requirements only. Facilities certified by CMS for Medicare and Medicaid, or planning to seek certification, are responsible for ensuring that the facility remains in compliance with the Conditions of Coverage.

Exceptions requested and granted by the Department will not be transferred to a new owner should a change of ownership occur.

Granting of this exception does not relieve the facility of the reporting requirements of the Pennsylvania Patient Safety Authority.