

NOTE: Subject line should include the phrase "Scope of Practice"

Dear Administrator Verma:

I welcome the opportunity to submit comments to the Centers of Medicare & Medicaid Services (CMS) to give additional input and recommendations regarding elimination of specific Medicare regulations that require more stringent supervision than existing state scope of practice laws, or that limit health professionals from practicing at the top of their license. I am a Certified Registered Nurse Anesthetists (CRNA) and provide anesthesia and pain management care for a wide variety of surgical cases in many different types of settings. CRNAs are the primary providers of anesthesia care in rural America, enabling healthcare facilities in these medically underserved areas to offer obstetrical, surgical, pain management, and trauma stabilization services.

Numerous peer reviewed studies have shown that CRNAs are safe, high quality and cost-effective anesthesia professionals who should practice to the full extent of their education and abilities. As a main provider of pain management services, CRNAs are uniquely skilled to provide both acute and chronic pain management in a patient centered, compassionate and holistic manner across the pain continuum in all clinical settings. Because CRNAs personally administer more than 49 million anesthetics to patients each year in the United States, their services are crucial to the successful development and implementation of techniques such as anesthesia enhanced recovery after surgery (ERAS[®]) programs. CRNAs and other anesthesia professionals play an integral role in these episodes of care as proper anesthesia services management can make a tremendous difference in terms of improving patient flow, patient safety, and cost savings. Conversely, research shows that suboptimal care in the preoperative, intraoperative, or postoperative phases of surgery may compromise care, resulting in poor patient outcomes and unnecessarily higher healthcare costs. As the agency increases its ongoing efforts to help reduce regulatory burdens that prevent CRNAs from practicing to their full scope and create and enforce a more patient-centered health care system that adheres to the key principles of affordability, accessibility, quality, innovation, and empowerment, we urge the strategic consideration of the role of anesthesia delivery that is safe and cost-efficient and include the use of techniques such as (ERAS[®]) programs, which help reduce costs and improve patient outcomes be emphasized in future patient care.

I appreciate this opportunity for comment. I believe removal of the requirement for physician supervision for CRNA anesthesia services is an important step and should be a priority for CMS. CRNAs are vital to resolving the challenges facing our nation's healthcare system and we look forward to partnering with the agency to show the important role CRNAs can have in achieving the main goals of meaningful reform, reducing health care costs, and improving access to the highest quality healthcare.

Sincerely,