

# AAS

Anesthesiologist  
**ASSISTANTS**

## INFLEXIBLE STAFFING STRUCTURE POTENTIAL **REDUCED REVENUE**

AAs are **only** able to provide anesthesia care **under the direct supervision** of a physician anesthesiologist.

Physician anesthesiologists can only bill for AAs when medical direction criteria are met.



**AAs CANNOT work Autonomously**



**Medical Direction (QK) TEFRA<sup>1</sup> Compliance Capability**

(2:1 Ratio)



**AA + ANES<sup>2</sup>**

**12 + 6**

**Staffing Cost<sup>3</sup>**

**4.52M**

**AAs CANNOT Collaborate with Surgeons or Proceduralists**



**Failed Medical Direction (QK) defer to Supervision (AD) Billing**

(3:1 Ratio)



**AA + ANES<sup>2</sup>**

**12 + 4**

**Staffing Cost<sup>3</sup>**

**3.68M**



**Significant Risk For Medicare Fraud**



**Reduced Revenue**

- **AAs must work** in an Anesthesia Care Team Model generally billed under Medical Direction billing model with no more than a 4:1 ratio (57 FR 33878, July 1992); However, the more costly, inefficient 2:1 ratio is more commonly used.
- AAs are trained to **ASSIST** physician anesthesiologists and **lack the staffing flexibility** needed in today's dynamic healthcare delivery systems. First starts in the morning and complications may result in delays **or even fraudulent practice or billing with potential jeopardy for facilities**. One study found physician anesthesiologists did not meet TEFRA rules 35% for 2:1 and 99% for 3:1 ratios.<sup>4</sup>
- CMS has **denied AAs** billing for services as performed autonomously. A physician anesthesiologist who fails to meet medical direction TEFRA<sup>1</sup> rules **must bill using the AD modifier and lose revenue** of up to 50%.

<sup>1</sup> Tax Equity and Fiscal Responsibility Act of 1982

<sup>2</sup> Physician anesthesiologist

<sup>3</sup> Staffing costs are based on salary only and provider staffing cost ratios are comparable when using median CRNA salary (\$166,540) according to 2018 AANA Compensation & Benefits Survey. Salary costs for physician anesthesiologists are based on the 75th pctl salary (\$420,284) according to HR Reported data as of March 29, 2018 from Salary.com

<sup>4</sup> Epstein R, Dexter F. (2012). Influence of supervision ratios by anesthesiologist on first case starts and critical portions of anesthetics. Anesthesiology, 116(3):683-691.