September 21, 2022

Nebraska Department of Health and Human Services
Licensure Unit
Attn: Technical Review Committee
PO Box 95026
Lincoln, NE 68509-5026

Attn: Technical Review Committee, Board of Health, and Dr. Gary Anthone,

My name is Kelly Driscoll, and I am the President and CEO of Faith Regional Health Services. Located in Norfolk, Nebraska, we are a non-profit, 131-bed acute care facility. I am writing this letter to express my opposition of the licensing of Anesthesiologist Assistants (AAs) in Nebraska.

At Faith Regional Health Services, all anesthesia providers, Certified Registered Nurse Anesthetist (CRNAs) and Physician Anesthesiologists administer their own anesthetics. We are comprised of three (3) physician anesthesiologists and eight to eleven (8-11) CRNAs who provide anesthetic and surgical care. We do not utilize the medically directed anesthesia care team model required for AA's as it would result in increased costs and decreased staffing efficiency. AA's are required to have the direct, on-site physical presence of a physician anesthesiologist at all times to administer anesthetics. CRNAs are able to work without the direct, on-site physical presence of a physician anesthesiologist and are able to administer anesthetics individually. Thus, AA's do not increase the total number of anesthesia providers in Nebraska, rather the AA's direct, on-site supervision requirement of two (2) providers per case versus one (1) provider (fulfilled by a CRNA or a physician anesthesiologist) per case would worsen the shortage of independent anesthesia providers.

Currently, there are not sufficient clinical training sites to accept the existing CRNA applicants. According to the program directors at both Bryan College of Health Sciences and Clarkson College, there were, in total, 175 applicants between both schools (some students did apply to both schools) with a maximum number of 43 students being accepted between both schools in 2022. If Nebraska does not currently have the availability in the cardiac operating rooms or the neurosurgery operating rooms to expand CRNA program acceptance numbers due to the need for more clinical sites; how will there be sufficient clinical sites for AA students? If an AA student is training in an operating room under physician medical direction, it removes the clinical experience from a CRNA student. Again, AA's do not increase the number of anesthesia providers in total but rather could decrease the total number of prospective CRNA applicants and adds a dependent provider to the health care workforce.

I would encourage Nebraska to prioritize education, recruitment and the retention of independently licensed CRNAs and physicians to ensure the continued access to high quality care. Supporting the licensing of Anesthesiologist Assistants (AAs) in Nebraska will only add to

the existing healthcare staffing shortage and further exacerbate the shortage of independent providers.

Thank you in advance for your thoughtful review and consideration of this issue. Please consider how moving forward with licensing Anesthesiologist Assistants in Nebraska could negatively impact health care in Nebraska. It is my hope that you will oppose the licensure of Anesthesiologist Assistants in Nebraska.

Sincerely,

Kelly Driscoll, President and CEO
Faith Regional Health Services
2700 Norfolk Avenue
Norfolk, NE 68701