

# Case Study: Use of CRNAs in Rural Colorado

Gail Finley

Vice President Rural Health and Hospitals

Colorado Hospital Association



# What is a CRNA?

Certified Registered Nurse Anesthetist:

A CRNA is a licensed “advance practice nurse” who has education and training in the delivery of anesthesia, and obtained national certification from a nationally recognized accrediting agency.



# Medicare CRNA Supervision

## § 482.52(a)(4)

A CRNA, as defined in..., who, unless exempted in accordance with paragraph (c) of this section, is under the supervision of the operating practitioner or of an anesthesiologist who is immediately available if needed;



# Medicare: CRNA Opt-out

§482.52(c)

Allows for a state exemption.

A hospital may be exempted from the requirement for physician supervision of CRNAs, if the state submits a letter signed by the Governor, after consulting with the State's Boards of Medicine and Nursing, requesting exemption.



# That letter...

Must attest that he or she has consulted with the state Boards of Medicine and Nursing about issues related to access to and the quality of anesthesia services in the State and has concluded that it is in the best interests of the state's citizens to opt-out of the current physician supervision requirement, and that the opt-out is consistent with State Law.



# The Case

Two critical access hospitals received deficiencies regarding physician supervision of CRNAs.

- In one, supervision was provided by a local surgeon. He was not on site, or immediately available.
- In the other, supervision was by a group of anesthesiologists who periodically came to town to “sign off” on the charts of the CRNAs



# The Response

Both modified policy to require that the operating surgeon provide the supervision

- In one, some surgical specialists threatened to stop providing services unless anesthesiologists were hired, they were unwilling to supervise the CRNAs
- In the other, due to the “discomfort” of the operating physicians, the hospital had to identify and commit \$350K/year for an anesthesiologist to supervise the CRNAs



# Work

## Patient Safety

- 2008 Collaborative Scopes of Care Advisory Committee: an evidence based review of the quality, safety and efficacy of using independent practice CRNAs
- Review of three years of hospital complaints, sentinel event/occurrence reports
- Board of Nursing review of complaints
- Board of Nursing survey of peers for CRNA complaints





# Impact on Access to Care

- Closest available “like care” was approximately 97 miles away, economic impact, difficult travel in winter, concerns that consumers would forego care
- Created a potential patient safety issue as the closest anesthesiologist was one hour away, leading to delayed surgical interventions for some emergent surgical cases.





**Table 1 - Types of Anesthesia Providers by Colorado's Rural Hospitals  
(Hospitals located in rural areas with more than 25 beds)**

<b>Rural Hospitals</b>	<b>City</b>	<b>Anesthesia Coverage in December 2008</b>	<b>Anesthesia Coverage in February 2010</b>
Arkansas Valley Regional Medical Center	La Junta	CRNA	CRNA
Colorado Plains Medical Center	Ft. Morgan	CRNA	CRNA
Delta County Memorial Hospital	Delta	CRNA	CRNA
Keefe Memorial Hospital	Cheyenne Wells	CRNA	CRNA
Mercy Regional Medical Center	Durango	Anesthesiologist	Anesthesiologist
Montrose Memorial Hospital	Montrose	Anes/CRNA	Anes/CRNA
San Luis Valley Regional Medical Center*	Alamosa	CRNA	CRNA
St. Thomas More	Canyon City	Anes/CRNA	Anes/CRNA
St. Anthony Summit Medical Center	Frisco	Anesthesiologist	Anes/CRNA
Sterling Regional Medical Center	Sterling	CRNA	CRNA
Vail Valley Medical Center	Vail	Anesthesiologist	Anesthesiologist
Valley View Hospital	Glenwood Springs	Anesthesiologist	Anesthesiologist
Yampa Valley Medical Center	Steamboat	Anesthesiologist	Anesthesiologist

*Key: Anes/CRNA = Anesthesiologists and CRNAs*

*CRNA = Certified Registered Nurse Anesthetists*



**Table 2 - Types of Anesthesia Providers by Colorado's Critical Access Hospitals (CAHs)  
(Hospitals located in rural areas with no more than 25 beds, over 35 miles from another hospital, or 15 miles from another hospital in mountainous terrain or areas with only secondary roads.)**

<b>Critical Access Hospitals</b>	<b>City</b>	<b>Anesthesia Coverage in December 2008</b>	<b>Anesthesia Coverage in February 2010</b>
Aspen Valley Hospital	Aspen	Anes/CRNA	Anes/CRNA
Conejos County Hospital Corp.	La Jara	No Surgery	No Surgery
East Morgan County Hospital	Brush	CRNA	CRNA
Estes Park Medical Center	Estes Park	CRNA	CRNA
Family Health West Hospital	Fruita	No Surgery	Anesthesiologist
Grand River Hospital District	Rifle	Anes/CRNA	Anes/CRNA
Gunnison Valley Hospital	Gunnison	CRNA	CRNA
Haxtun Hospital District	Haxtun	CRNA	CRNA
Heart of the Rockies Regional Medical Center	Salida	CRNA	CRNA
Kit Carson County Memorial Hospital	Burlington	CRNA	CRNA
Kremmling Memorial Hospital	Kremmling	CRNA	CRNA
Lincoln Memorial Hospital	Hugo	CRNA	CRNA
Melissa Memorial Hospital	Holyoke	CRNA	CRNA
Mt. San Rafael Hospital	Trinidad	CRNA	CRNA
Pagosa Mountain Hospital	Pagosa Springs	No Surgery	No Surgery

*Key: Anes/CRNA = Anesthesiologists and CRNAs  
CRNA = Certified Registered Nurse Anesthetists*



“CRNAs are the sole anesthesia providers in most of Colorado’s rural hospitals. They practice independently, administering anesthesia services, airway management, and trauma stabilization to rural Coloradans whose lives often depend on the availability of the CRNA in the local community. Opting out of the federal CRNA supervision requirement is consistent with Colorado’s state hospital regulations and since it became available in 2001, fifteen states have taken the Opt-out with no adverse consequences. Because CRNAs provide a safe, valuable option for anesthesia care in rural communities where there are no anesthesiologists, the Colorado Rural Health Center (the State Office of Rural Health) strongly supports the Opt-out for Colorado.”

***Lou Ann Wilroy, Chief Executive Officer, Colorado Rural Health Center***

“As a result of the deficiency we received from CDPHE regarding the supervision of CRNAs, out-of-town surgeons, primarily orthopedics, will not perform surgery here anymore because of the CRNA supervisory requirements we had to put in place. This causes the patient and family to travel at least 2 hours one-way, find lodging and arrange transportation for procedures we could perform locally. This is a huge access to quality healthcare issue as well as an economic issue for these patients, the local community and our medical center.”

**Ken Leisher, CEO, Heart of the Rockies Regional Medical Center, Salida**



"During the last of my eight years as President of the Colorado State Board of Health, we were asked by Governor Bill Owens to give an opinion as to whether he should "Opt-out" of the CMS regulation requiring physician supervision of Certified Registered Nurse Anesthetists in Colorado. At that time, my sense was that there was really no need for the Opt-out, though my opinion proved to be in the minority, as the Board of Health voted to recommend the Governor Opt-out of this provision. Since that time, I have realized that a number of rural hospitals face the possible loss of their surgical services, since many surgical specialists are quite averse to providing "supervision" for a service about which they have absolutely no knowledge or training. In essence, it is truly a sham requirement for specialists with no anesthesia training whatsoever to provide such supervision. In my own rural hospital, we are experiencing reluctance on the part of several surgical specialists to provide services so long as this supervision requirement is extant. Therefore, I respectfully urge Governor Ritter to consider strongly implementing the Opt-out provision from the CMS rule requiring physician supervision of Certified Registered Nurse Anesthetists as soon as possible."

**V. Michael Barkett, M.D., Fellow, American College of Surgeons, Fellow, American College of Gastroenterology, Diplomat, American Board of Surgery, Former President, Colorado State Board of Health**



# Success/Outcome

- Governor Ritter submitted a letter to CMS
  - Specific to Rural Hospitals
  - The opt-out allowed hospitals and medical staff to supervise CRNAs anyway they wanted too
  - Allowed full “independent” practice authority without supervision
- Colorado Medical Society and the Colorado Society of Anesthesiologists filed a lawsuit





# Professional Regulations

- Very important
- Foundation for patient safety
- Also have interests in meeting the health care needs of our communities, ensuring access to care, creating options for community





# Status of the Lawsuit

- Basis of lawsuit
  - Patient Safety
  - Financial harm
  - Nurse Practice Act
  - Captain of the Ship
  - Delegated Medical Function
- Rulings to Date – since 2010
  - State Supreme Court Hearing – early June

