



JAMES L. MADARA, MD
EXECUTIVE VICE PRESIDENT, CEO

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August 18, 2017

Via email gail.bernth@alaska.gov

Gail Bernth, MSN, ANP
Executive Administrator
Alaska Board of Nursing
550 West Seventh Avenue
Anchorage, Alaska 99501

Re: Proposed Changes to Title 12, Chapter 44, of the Alaska Administrative Code

Dear Administrator Bernth:

On behalf of the American Medical Association (AMA) and our physician and student members, I am writing to express our opposition to the proposed changes to the Alaska Administrative Code that would remove physician involvement from nurse anesthetist scope of practice. Expanding regulations governing nurse practitioners to include all advanced practice nurses has the effect of allowing nurse anesthetists to practice independent of physician supervision, collaboration, or oversight. For the reasons below, we oppose this change and strongly urge the Alaska Board of Nursing to reconsider its proposal.

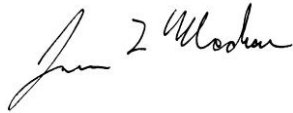
Notably, the proposed change is inconsistent with state law. Alaska regulations require nurse anesthetists to practice and prescribe pursuant to written practice guidelines with a physician anesthesiologist, physician, or dentist (12 AAC 44.500 and 44.525). Alaska regulations also specify that nurse anesthetists must administer anesthesia in consultation with a physician or dentist (112 AAC 44.510). While Alaska has chosen to opt out of Medicare rules requiring physician supervision of anesthesia, it is important to note that this opt out does not preempt the aforementioned regulations. As such, nurse anesthetists in Alaska are not currently independent practitioners, and the proposed regulations would drastically expand their scope of practice.

The proposed changes are dangerous to patients. Physician expertise – whether physician anesthesiologist, surgeon, or other physician – is critical in the perioperative period, when seconds can mean the difference between life and death. As such, we strongly encourage the Board to maintain physician leadership of the anesthesia care team, and not adopt this proposed regulation, particularly as it pertains to nurse anesthetists.

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Thank you for your consideration. If you have any questions, please contact Kristin Schleiter, JD, Senior Legislative Attorney, Advocacy Resource Center, at kristin.schleiter@ama-assn.org or (312) 464-4783.

Sincerely,

A handwritten signature in cursive script, appearing to read "James L. Madara".

James L. Madara, MD

cc: Alaska State Medical Association
American Society of Anesthesiologists