



Nebraska
Academy
of PAs

October 13, 2022

Technical Review Committee for the Credential Review of Anesthesiology Assistants:

The Nebraska Academy of PAs (NAPA), representing physician assistants across Nebraska, appreciates the opportunity to provide comments on the credential review to license Certified Anesthesiologist Assistants (CAA) in Nebraska. This letter is not intended to offer a position of support or opposition, our legislative board remains neutral on the specific proposal. NAPA respectfully submits concern regarding the 407 application of anesthesiologist assistants that compares a CAA's scope to that of a PA with access to patients and relationships with physicians incorporated into the care we provide. The comparison between PAs and CAAs misrepresents our profession and deserves further explanation.

The scope of practice of PAs allows for the provision of medical services delegated by and provided with the collaboration of a licensed physician or podiatrist. The proposed scope of practice for a CAA is to perform various supportive tasks under the direction of a physician anesthesiologist. NAPA contends that CAAs should not be able to have their own patients (those they see in isolation from other licensed health care professionals). For example, while many patients have a dedicated PA, they must call to schedule an appointment and services are billed as if provided by the PA. The same could not be said for a CAA. People will be patients of the anesthesiologist, not the CAA, who will be working under the direction of an anesthesiologist for a specific patient interaction.

Furthermore, the terminology of "certified anesthesiologist assistant" could be confusing to the public who are familiar with the role of a PA whose training, education, and licensure makes PAs able to provide a more diverse array of medical services. Again, NAPA takes no issue with the underlying merits of the CAAs' proposed scope of practice but wishes to clarify that the two scopes of practice and models of providing medical services are not as similar as the applicant group suggests.

Thank you for the opportunity to provide feedback on the proposed 407 application. NAPA welcomes further discussion with Nebraska's Department of Health and Human Services regarding these issues and encourages a continued dialogue. For any questions you may have please do not hesitate to contact Joselyn Luedtke, NAPA lobbyist, at joselyn@zulkoskiweber.com.

Thank you,

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