23 December 2009

Kent Cannaday, CRNA
Texas Association of Nurse Anesthetists
701 Brazos Street, Suite 670
Austin, TX 78701

Dear Mr. Cannaday:

This letter is in reference to the Texas Association of Nurse Anesthetists’ (TANA’s) request for information on the practice of certified registered nurse anesthetists (CRNAs) in the State of Texas. You specifically requested information related to the ordering of drugs and devices for the purpose of providing anesthesia or anesthesia-related services and whether CRNAs are required to hold prescriptive authority and controlled substance registration numbers.

The CRNA’s license to practice in an advanced practice role is derived from the Nursing Practice Act and his/her educational preparation as a nurse anesthetist. Like physicians, CRNAs are credentialed to practice in facilities (e.g. hospitals or ambulatory surgical centers) by medical staff bylaws or institutional policies. The CRNA’s credentialing must include physician delegation to order drugs and devices for the purpose of providing anesthesia or anesthesia-related services.

Section 157.058 of the Medical Practice Act (Texas Occupations Code) codifies the practice of CRNAs as follows:

§157.058. Delegation to Certified Registered Nurse Anesthetist

(a) In a licensed hospital or ambulatory surgical center, a physician may delegate to a certified registered nurse anesthetist the ordering of drugs and devices necessary for the nurse anesthetist to administer an anesthetic or an anesthesia-related service ordered by the physician [emphasis added].

(b) The physician’s order for anesthesia or anesthesia-related services is not required to specify a drug, dose, or administration technique.

(c) Pursuant to the physician’s order and in accordance with facility policies or medical staff bylaws, the nurse anesthetist may select, obtain, and administer those drugs and apply the medical devices appropriate to accomplish the order and maintain the patient within a sound physiological status [emphasis added].

(d) This section shall be liberally construed to permit the full use of safe and effective medication orders to use the skills and services of certified registered nurse anesthetists.

The aforementioned statute expressly permits CRNAs to select, obtain and administer anesthesia and anesthesia-related medications and apply appropriate medical devices necessary to accomplish the order and maintain the patient within a sound physiological status. The CRNA may carry out these functions pursuant to a physician’s order for anesthesia or an anesthesia-related service that does not have to be drug-specific, dose-specific, or administration technique-specific. These functions are appropriate for CRNAs based on their advanced educational preparation.
In order to provide effective anesthesia and anesthesia-related services, CRNAs need to have the ability to order dangerous drugs as well as controlled substances in Schedules II through V. The Board believes that CRNAs may order these medications once they have been credentialed to do so in the institutional setting without the need for prescriptive authorization from the Board of Nursing. The Board has never required CRNAs to hold prescriptive authority or separate controlled substance registrations because the authority to order such medications has been delegated to the CRNA by a physician.

The Texas Board of Nursing is the state agency with the legal authority to regulate the practice of advanced practice registered nurses in the State of Texas (Texas Occupations Code, Sec. 301.152). The board affirms that CRNAs may select, order, and obtain medications necessary for the administration of anesthesia and anesthesia-related services pursuant to a physician's order and consistent with medical staff bylaws or policies. Additional prescriptive authorization is not required for CRNAs writing medication orders.

I hope this information is helpful to you. If you require additional information or clarification, please feel free to contact me.

Sincerely,

[Signature]

Katherine A. Thomas, MN, RN
Executive Director

cc: Lynda Woolbert, Coalition for Nurses in Advanced Practice
Jim Willmann, Texas Nurses Association
Jim Walker, Nurse anesthesia representative to BON APN Advisory Committee
Susan Willis, TANA representative to BON APN Advisory Committee