



Understanding CMS Requirements for SRNA Participation in Hospitals

Overview

This fact sheet clarifies Centers for Medicare & Medicaid (CMS) regulations and policy confirming Student Registered Nurse Anesthetists (SRNA) participation in teaching models. CMS rules recognize SRNA participation in anesthesia teaching cases in hospitals.

Key Takeaway

SRNAs are permitted to participate in teaching cases, including those in hospital settings, under the Medicare teaching rules and under Medicare payment rules.ⁱ There is no need for facilities to amend their by-laws and policies related to SRNAs. Certified Registered Nurse Anesthetist's (CRNA) working with SRNAs should contact their facility administrators to ensure compliance with federal teaching rules.

Facts about Medicare Regulations and Policy Regarding SRNAs

The Medicare hospital Conditions of Participation or corresponding hospital interpretive guidelines do not restrict SRNAs from being involved in anesthesia teaching cases in hospitals. The requirements for informed consent process in the hospital interpretive guidelines acknowledge their use by requiring hospitals to document the use of advanced practice provider students, which would include SRNAs, in tasks related to the surgery, such as administering anesthesia, in the informed consent.ⁱⁱ

Medicare payment policy for clinicians recognizes and acknowledges the use of 1:2 supervision ratio of teaching CRNAs or physician anesthesiologists to SRNAs.ⁱⁱⁱ Nothing excludes this payment from being made for teaching cases in the hospital setting.

CMS **does not prohibit** the SRNA from being the only anesthesia provider in the operating room for appropriate intervals. Medicare payment policy implies that there may be instances when the SRNA may be left alone in the room:

Reference of Use	Excerpt
140.5 - Payment for Anesthesia Services Furnished by a Teaching CRNA^{iv}	Payment can be made under Part B to a teaching CRNA who supervises a single case involving a student nurse anesthetist... The A/B MAC may allow payment...if a teaching CRNA is involved in cases with two student nurse anesthetists... The teaching CRNA can decide how to allocate his or her time to optimize patient care in the two cases [involving two SRNAs] based on the complexity of the anesthesia cases, the experience and skills of the student nurse anesthetists, and the patients' health status and other factors.

ⁱ The Joint Commission's facility accreditation standards also do not restrict the use of SRNAs in teaching cases. See The Joint Commission's FAQ stating that their standards are not intended to restrict health profession students in patient care: <https://www.jointcommission.org/en-us/knowledge-library/support-center/standards-interpretation/standards-faqs/000001178>. In addition, state laws generally exempt SRNAs from CRNA licensure requirements or state that SRNA practice is not prohibited. Please review your applicable state Nurse Practice Act and Board of Nursing Rules as well as facility laws to ensure that SRNAs are working in compliance with those laws.

ⁱⁱ State Operations Manual, Appendix A – Survey Protocol, Regulations and Interpretive Guidelines for Hospitals; A-0955

ⁱⁱⁱ The CMS Teaching Rules, available at [42 § 414.61](#) (see also: [42 § 414.46](#) and [Section 140.5 of Chapter 12 Medicare payment policy](#)), explicitly allow for a 1-2 supervision ratio of Certified Registered Nurse Anesthetists/physician anesthesiologist to SRNAs. In fact, CMS requires that the CRNA devote their time to those two cases, be present for pre- and post-anesthesia care and be available during the procedure. The supervision requirements and ratios for SRNAs allow for essential clinical experience opportunities for professional registered nurses who are enrolled in nurse anesthesia education programs.

^{iv} Medicare Internet Only Manual 100-04, Medicare Claims Processing Manual, Chapter 12 Section 140.5