

STATE OF FLORIDA
BOARD OF NURSING

IN RE: THE PETITION
FOR DECLARATORY
STATEMENT OF
PAUL DOW, CRNA

FINAL ORDER

THIS CAUSE came before the BOARD OF NURSING (hereinafter Board) pursuant to §120.565, Florida Statutes, and Rule Chapter 28-105, Florida Administrative Code, at a duly-noticed meeting in Tampa, Florida on June 7, 2006, for the purpose of considering the Petition for Declaratory Statement (attached as Exhibit A) filed by PAUL DOW, CRNA (hereinafter Petitioner). Having considered the petition, the arguments submitted by counsel for Petitioner, and being otherwise fully advised in the premises, the Board makes the following findings and conclusions.

FINDINGS OF FACT

1. This petition was noticed by the Board in Vol. 32, No. 19, dated May 12, 2006 of the Florida Administrative Weekly at page 2247.
2. Petitioner, PAUL DOW, CRNA, is a certified registered nurse anesthetist licensed to practice professional and advanced practice nursing in the State of Florida, having license number ARNP 1342752.
3. Petitioner is employed by Anesthesia Associates of Dunedin (AAD).
4. AAD recently agreed to provide clinical training for an unlicensed anesthesiologist assistant (AA) trainee. The AA trainee is reported to be a student at an anesthesiologist assistant training program located outside Florida.
5. On or about April 7, 2006, Petitioner's supervising anesthesiologist was

directly supervising the AA trainee in the performance of an anesthetic procedure at Mease Countryside Hospital in Safety Harbor, Florida.

6. Prior to the completion of the procedure, the anesthesiologist ordered Petitioner to take over the supervision of the unlicensed AA trainee while the AA trainee completed the procedure.

7. Petitioner refused to comply with the order, because he questioned whether he, as a CRNA, should supervise an AA trainee in the administration of anesthesia.

8. The supervising anesthesiologist advised Petitioner that he was an employee of AAD, and as an employee he would have to supervise the AA trainee if directed to do so. Petitioner still refused to supervise the AA trainee.

9. Petitioner seeks a declaratory statement as to whether the supervision of an unlicensed AA trainee by a CRNA is authorized by Florida law, or whether it would violate Florida statutes and rules governing the practice of nursing.

10. The statutory provisions on which the declaratory statement is sought are Sections 456.072(1)(j), 456.072(1)(p), 464.012(3) and (4), 464.018(1)(l) and 464.018(1)(o), Florida Statutes. The provisions of the Florida Administrative Code upon which this declaratory statement is sought are Rules 64B9-4.001, 64B9-4.010, 64B9-8.005, and 64B9-14, Florida Administrative Code.

11. Licensure as an AA requires completion of an approved graduate level program. Section 458.3475(6)(a)4.a., Florida Statutes.

12. An approved program is one accredited by the Committee on Accreditation of Allied Health Education Programs (CAAHEP). Rule 64B8-31.004, Florida Administrative Code. The accreditation standards of CAAHEP are not described in

Chapter 458, Chapter 459, or Rule 64B8-31.004.

13. The Board assumes for purposes of this Order that the clinical training by AAD is part of the requirements for accreditation by CAAHEP.

14. According to the Petition, AA trainees are not required to have any type of health care training or licensure before they enter an AA training program; nor is any such preliminary licensure or education required by Section 458.3475.

CONCLUSIONS OF LAW

1. The Board has jurisdiction over this matter pursuant to Section 120.565, Florida Statutes, and Rule 28-105, Florida Administrative Code.

2. The petition filed in this cause is in substantial compliance with the provisions of Section 120.565, Florida Statutes, and Rule 28-105, Florida Administrative Code.

3. The practice of AAs in Florida is governed by Sections 458.3475 and 459.023, Florida Statutes. Pursuant to Sections 458.3475(1)(b) and 459.023(3)(a), an AA must be directly supervised by an anesthesiologist, *e.g.*, a licensed physician as defined in Sections 458.3475(1)(a) or 459.023(1)(a).

4. AA trainees are not required to be licensed registered nurses, are not required to have nursing training or clinical nursing experience, and are not governed by Chapter 464, Florida Statutes or Rule 64B9, Florida Administrative Code.

5. Petitioner does not know the extent of the didactic curriculum of an accredited program or this AA trainee's program, the extent of clinical training provided as part of the didactic program, the extent of what appears to be an internship requirement.

6. Since an AA is licensed to *assist* an anesthesiologist, not perform services as an anesthetist, Petitioner does not have sufficient knowledge of the appropriate scope

of practice of an AA in Florida.

7. Sections 464.012(3) and (4), together with an appropriate protocol, set forth the scope of practice of a CRNA. The Board has approved ARNPs to serve as faculty in practical nursing programs and registered nursing programs, and requires ARNP faculty members in post-graduate programs leading to licensure as an ARNP. See, Rules 64B9-2.005(3)(d) and 64B9-4.003(2)(e). Neither Section 464.012(3) or (4), nor Section 458.3475 authorize a CRNA to train or supervise an AA.

8. Section 456.072(1)(j), Florida Statutes, and Rule 64B9-8.005(2)(g) prohibit aiding, assisting, procuring, employing or advising any unlicensed person to practice a profession contrary to the chapter regulating the profession. It would appear to be contrary to Section 458.3475 for anyone other than a physician to supervise an AA, much less an unlicensed AA intern or trainee. Therefore, supervision by petitioner would be assisting or advising an unlicensed person to practice contrary to the supervision requirements of Section 458.3475.

9. Rule 64B9-8.005(2)(n), Florida Administrative Code, provides that practicing beyond the scope of the licensee's license, educational preparation or nursing experience constitutes a departure from the minimal standards of acceptable and prevailing nursing practice. There is no statutory authority for a Petitioner to supervise an AA, trainee or licensee. Without specific knowledge of the content of an approved training program and the appropriate scope of practice for the knowledge base acquired therein, Petitioner does not have adequate educational preparation or nursing experience to supervise an AA trainee.

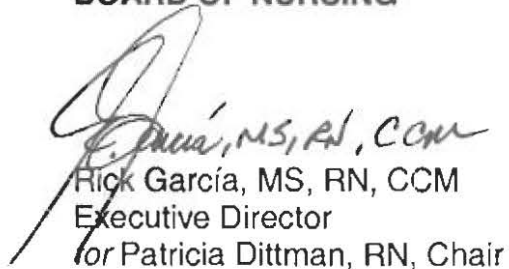
10. Supervision of an AA, trainee or licensee, would be practicing beyond the

scope of Petitioner's license in violation of 464.018(1)(h) and 456.072(1)(o), Florida Statutes.

WHEREFORE, the Board hereby finds that under the specific facts of the petition, as set forth above, Petitioner, Paul Dow, is not authorized by statute, and is not qualified by licensure, education or experience, to supervise an AA trainee engaged in the practice of anesthesia assistance during an approved training program.

DONE AND ORDERED this 25 day of July, 2006.

BOARD OF NURSING


Rick Garcia, MS, RN, CCM
Executive Director
for Patricia Dittman, RN, Chair

NOTICE OF APPEAL RIGHTS

Pursuant to Section 120.569, Florida Statutes, the parties are hereby notified that they may appeal this Final Order by filing one copy of a notice of appeal with the clerk of the department and by filing a filing fee and one copy of a notice of appeal with the District Court of Appeal within thirty days of the date this Final Order is filed.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Final Order has been furnished by U.S. Mail to Petitioner PAUL DOW, CRNA, 1014 Martin Luther King Jr. Blvd., Dunedin FL 34698 and James W. Linn, Esquire, P.O. Box 10788, Tallahassee FL 32302, this 20th day of July, 2006.


Deputy Agency Clerk

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FILED⁰²
DEPARTMENT OF HEALTH
DEPUTY CLERK
CLERK *Jhenna McKinn*

DATE 4-26-06



LEWIS, LONGMAN & WALKER, P.A.
ATTORNEYS AT LAW

REPLY TO: TALLAHASSEE

April 26, 2006

RECEIVED

RECEIVED

APR 26 2006

MAY 01 2006

HMQACB

Patricia Dittman, RN, Chair
Florida Board of Nursing
4052 Bald Cypress Way, Bldg C02
Tallahassee, FL 32399-3252

DEPT. OF LEGAL AFFAIRS
Administrative Law Bureau

Re: Petition for Declaratory Statement of Paul Dow, CRNA
(Supervision of Unlicensed Anesthesiologist Assistant Trainees)

Dear Ms. Dittman:

On behalf of our client, Paul Dow, CRNA, a petition for declaratory statement is enclosed. The petition seeks the Board of Nursing's opinion as to the applicability of certain provisions of the Nurse Practice Act and other statutes and rules governing the practice of nursing, to Mr. Dow's particular circumstances.

Specifically, the petition requests a declaratory statement as to whether the supervision of an unlicensed anesthesiologist assistant (AA) trainee by a CRNA is authorized by Florida law, or whether it would violate Florida statutes and rules governing the practice of nursing.

Mr. Dow is substantially affected by this issue because he has been directed by his employer (a group of physician anesthesiologists) to supervise an unlicensed AA trainee, and he is uncertain as to whether his supervision of an unlicensed AA trainee in the administration of anesthesia is authorized by the statutes and rules governing his practice as a CRNA. This is an important issue to Mr. Dow as well as to many other CRNAs throughout Florida, who have been informed that they will also be required to supervise unlicensed AA trainees. We believe that once the Board of Nursing has an opportunity to consider the issues raised in the petition, it will issue a declaratory statement that the supervision of an unlicensed AA trainee in the administration of anesthesia by a CRNA is not authorized by Florida law, and would constitute a violation of one or more provisions of Chapters 456 or 464, Florida Statutes, and rules of the Board.

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Suite 670
Bradenton, FL 34205
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125 South Gadsden Street, Suite 300
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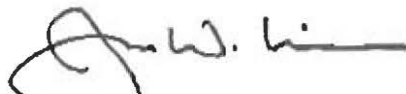
West Palm Beach
1700 Palm Beach Lakes Blvd.
Suite 1000
West Palm Beach, FL 33401
(561) 640-0820
Fax: (561) 640-8202

Patricia Dittman, RN, Chair
April 26, 2006
Page 2

We ask that notice of the enclosed petition be published in the next available issue of the Florida Administrative Weekly, as required by law, and that the petition be placed on the agenda of the next meeting of the Board of Nursing.

We would be pleased to provide additional information on this issue at the Board's request.

Sincerely,



James W. Linn

Enclosure

cc: Joe Baker, Jr., Acting Executive Director
Lee Ann Gustafson, Board Counsel

**STATE OF FLORIDA
DEPARTMENT OF HEALTH
BOARD OF NURSING**

In Re: Petition for Declaratory Statement of
Paul Dow, CRNA,

Petitioner,

RECEIVED

MAY 01 2006

DEPT. OF LEGAL AFFAIRS
Administrative Law Bureau

PETITION FOR DECLARATORY STATEMENT

Petitioner, Paul Dow, CRNA, by and through his undersigned attorneys and pursuant to Section 120.565, Florida Statutes and Chapter 28-105, Florida Administrative Code, petitions the Board of Nursing for a declaratory statement and states as follows:

1. The Petitioner is Paul Dow, whose address is: 1014 Martin Luther King Jr. Blvd, Dunedin, Florida 34698, phone: (727) 734-7733.
2. Attorneys for Petitioner: James W. Linn and Glenn E. Thomas, Lewis, Longman & Walker, P.A., 125 South Gadsden Street, Suite 300, Tallahassee, Florida, 32301, Phone: (850) 222-5702, Fax: (850) 224-1600.

Statement of Facts

3. Petitioner is a licensed Registered Nurse and a Certified Registered Nurse Anesthetist (CRNA), certified pursuant to section 464.012, Florida Statutes.
4. Petitioner is employed by Anesthesia Associates of Dunedin.
5. Anesthesia Associates of Dunedin recently agreed to provide clinical training for an unlicensed anesthesiologist assistant (AA) trainee. The unlicensed AA trainee is reported to be a student at an anesthesiologist assistant training program located outside Florida.

6. On or about April 7, 2006, Petitioner's supervising anesthesiologist was directly supervising the AA trainee in the performance of an anesthetic procedure at Mease Countryside Hospital in Safety Harbor, Florida.

7. Prior to the completion of the procedure, the anesthesiologist ordered Petitioner to take over the supervision of the unlicensed AA trainee while the AA trainee completed the procedure.

8. Petitioner refused to comply with the order, because he questioned whether he, as a CRNA, should supervise an unlicensed AA trainee in the administration of anesthesia.

9. The supervising anesthesiologist advised Petitioner that he was an employee of Anesthesia Associates of Dunedin, and as an employee he would have to supervise the unlicensed AA trainee if directed to do so. Petitioner still refused to supervise the AA trainee.

10. Petitioner seeks a declaratory statement as to whether the supervision of an unlicensed AA trainee by a CRNA is authorized by Florida law, or whether it would violate Florida statutes and rules governing the practice of nursing.

Relevant Statutory and Regulatory Provisions

11. The statutory provisions on which this declaration is sought are Sections 456.072(1)(j), 456.072(1)(p), 464.012(3) and (4), 464.018(1)(l), 464.018(1)(o), and 464.012(4), Florida Statutes. The provisions of the Florida Administrative Code upon which this declaration is sought are Rules 64B9-4.001, 64B9-4.010, 64B9-8.005, and 64B9-14, Florida Administrative Code.

12. The practice of anesthesiologist assistants in Florida is governed by Sections 458.3475 and 459.023, Florida Statutes. These statutes provide definitions and standards of performance for licensed anesthesiologist assistants and supervising anesthesiologists. A licensed AA may perform "medical services delegated and directly supervised by a supervising anesthesiologist." Section 458.3475(1)(b), Fla. Stat.

13. The AA statutes require that licensed AAs must be under the "direct supervision" of a board certified or board eligible anesthesiologist whenever they are involved in an anesthetic procedure. "Direct supervision" is defined as "onsite, personal supervision by an anesthesiologist who is present in . . . the surgical or obstetrical suite when the procedure is being performed in that surgical or obstetrical suite, and who is in all instances immediately available to provide assistance and direction to the anesthesiologist assistant while anesthesia services are being performed." Section 458.3475(1)(g), Fla. Stat.

14. However, Sections 458.3475(4) and 459.023(4), Florida Statutes, completely exempt unlicensed AA trainees from the requirements of the statutes governing AA practice, including the supervision requirement:

PERFORMANCE BY TRAINEES.—The practice of a trainee is exempt from the requirements of this chapter while the trainee is performing assigned tasks as a trainee in conjunction with an approved program.

15. Sections 458.3475(11) and 459.023(11) expressly state that the supervising anesthesiologist is liable for the performance of the licensed AA. However, there is no similar provision in the law that makes the supervising anesthesiologist liable for the performance of an unlicensed AA trainee.

16. Since Chapters 458 and 459 are silent as to the supervision requirements of unlicensed AA trainees, Petitioner, as a licensed registered nurse and certified registered nurse anesthetist, must seek guidance from the Board of Nursing as to whether his supervision of an unlicensed AA trainee is authorized by the Nurse Practice Act, or would violate the statutes and rules governing the practice of nursing.

17. The functions that may be performed by an advanced registered nurse practitioner who is certified as a certified registered nurse anesthetist are set forth in Section 464.012(3) and (4), Florida Statutes:

(3) An advanced registered nurse practitioner shall perform those functions authorized in this section within the framework of an established protocol. A practitioner currently licensed under chapter 458, chapter 459, or chapter 466 shall maintain supervision for directing the specific course of medical treatment. Within the established framework, an advanced registered nurse practitioner may:

- (a) Monitor and alter drug therapies.
- (b) Initiate appropriate therapies for certain conditions.
- (c) Perform additional functions as may be determined by rule in accordance with s. 464.003(3)(c).
- (d) Order diagnostic tests and physical and occupational therapy.

(4) In addition to the general functions specified in subsection (3), an advanced registered nurse practitioner may perform the following acts within his or her specialty:

(a) The certified registered nurse anesthetist may, to the extent authorized by established protocol approved by the medical staff of the facility in which the anesthetic service is performed, perform any or all of the following:

1. Determine the health status of the patient as it relates to the risk factors and to the anesthetic management of the patient through the performance of the general functions.
2. Based on history, physical assessment, and supplemental laboratory results, determine, with the consent of the responsible physician, the appropriate type of anesthesia within the framework of the protocol.
3. Order under the protocol preanesthetic medication.
4. Perform under the protocol procedures commonly used to render the patient insensible to pain during the performance of surgical, obstetrical, therapeutic, or diagnostic clinical procedures. These procedures include ordering and administering regional, spinal, and general anesthesia; inhalation agents and techniques; intravenous agents and techniques; and techniques of hypnosis.
5. Order or perform monitoring procedures indicated as pertinent to the anesthetic health care management of the patient.
6. Support life functions during anesthesia health care, including induction and intubation procedures, the use of appropriate mechanical supportive devices, and the management of fluid, electrolyte, and blood component balances.
7. Recognize and take appropriate corrective action for abnormal patient responses to anesthesia, adjunctive medication, or other forms of therapy.

8. Recognize and treat a cardiac arrhythmia while the patient is under anesthetic care.

9. Participate in management of the patient while in the postanesthesia recovery area, including ordering the administration of fluids and drugs.

10. Place special peripheral and central venous and arterial lines for blood sampling and monitoring as appropriate.

18. Nothing in the above-quoted statute authorizes or contemplates a CRNA supervising an unlicensed AA trainee in the administration of anesthesia.

19. Rule 64B9-4.001(1) defines "Advanced Registered Nurse Practitioner" to include a registered nurse duly certified pursuant to section 464.012, Florida Statutes. Rules governing the practice of ARNPs therefore apply to Petitioner. Rule 64B9-4.010 provides numerous standards for ARNP protocols, none of which authorize or contemplate a CRNA supervising an unlicensed AA trainee in the administration of anesthesia.

20. Section 456.072(1)(j), Florida Statutes and Rule 64B9-8.006(3)(aa) prohibit a licensee from:

Aiding, assisting, procuring, employing, or advising any unlicensed person or entity to practice a profession contrary to this chapter, the chapter regulating the profession, or the rules of the department or the board.

21. Section 456.072(1)(p), Florida Statutes, prohibits a licensee from:

Delegating or contracting for the performance of professional responsibilities by a person when the licensee delegating or contracting for performance of such responsibilities knows, or has reason to know, such person is not qualified by training, experience, and authorization when required to perform them.

22. Section 464.018(1), Florida Statutes prohibits a licensee from:

(l) Knowingly violating any provision of this part, a rule of the board or the department, or a lawful order of the board or department previously entered in a disciplinary proceeding or failing to comply with a lawfully issued subpoena of the department.

(o) Violating any provision of this chapter or chapter 456, or any rules adopted pursuant thereto.

23. Rule 64B9-8.005(2) provides that:

Failing to meet or departing from minimal standards of acceptable and prevailing nursing practice shall include, but not be limited to, the following:

* * *

(g) Aiding and abetting the practice of registered nursing or practical nursing by any person not licensed as a registered nurse or a licensed practical nurse.

**Description of How the Statutes and Rules
Apply to Petitioner's Circumstances**

24. Section 464.012, Florida Statutes, expressly authorizes a certified CRNA to administer anesthesia and perform a wide range of anesthesia-related functions pursuant to an established protocol approved by the medical staff of the facility in which the anesthetic service is performed.

25. Certified registered nurse anesthetists are authorized to serve as faculty and participate in the education and clinical training of licensed registered nurses who are enrolled in an accredited nurse anesthesia master's degree program. Fla. Admin. Code Rule 64B9-4.003(2).

26. AA trainees are not required to be licensed registered nurses, are not required to have nursing training or clinical nursing experience, and are not governed by Chapter 464, Florida Statutes or Rule 64B9, Florida Administrative Code.

27. The education and training of CRNAs is very different than that of AAs. AAs are specifically trained to assist anesthesiologists, and are limited to practicing under the direct supervision (in the same operating suite) of an anesthesiologist. In contrast, CRNAs are educated and trained to administer all types of anesthesia, with or without anesthesiologist supervision.

28. AA trainees are not required to have any type of health care training or licensure before they enter an AA training program.

29. In contrast, CRNAs must graduate from a four year baccalaureate program, obtain licensure as a registered nurse, and have at least one year of critical care nursing experience before they begin a master's level nurse anesthesia program.

30. Because of the differences in education, training and licensure between CRNAs and AAs, Petitioner has no way of knowing what professional responsibilities an unlicensed AA trainee is qualified by training, experience, and authorization to perform. The supervision of an unlicensed AA trainee by Petitioner would therefore constitute a violation of section 456.072(1)(p), Florida Statutes, and Rule 64B9-8.006(3)(aa).

31. The applicable standards for protocols between an ARNP and a supervising physician, as set forth in Rule 64B9-4.010, do not authorize or contemplate a CRNA supervising an unlicensed AA trainee in the administration of anesthesia.

32. CRNAs are required by law to maintain professional liability (malpractice) insurance as a condition of licensure. Section 456.048, Fla. Stat. However, physicians, including anesthesiologists, are not required by Florida law to have professional liability insurance. Section 458.320, Fla. Stat. Although the statutes governing AAs impose liability on the supervising anesthesiologist for the performance of licensed AAs, the statutes are silent concerning who is liable for the performance of unlicensed AA trainees. Moreover, unlicensed AA trainees are not required by Florida law to have professional liability insurance. Serious liability issues could arise if CRNAs are forced to supervise unlicensed AA trainees. Simply put: A CRNA who supervises an unlicensed AA trainee could easily become the "deep pocket" in the event the AA trainee commits a negligent act.

33. Florida CRNAs' commitment to patient safety and positive patient outcomes has helped to keep CRNAs' professional liability insurance premiums affordable. If CRNAs are forced to supervise inexperienced, unlicensed AA trainees, it is likely that increased CRNA insurance premiums or limits on the ability of CRNAs to find adequate coverage will result.

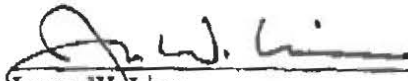
Ultimately, increases in the cost of professional liability insurance coverage for CRNAs will drive CRNAs from the state, and decrease Florida citizens' access to anesthesia services.

34. Florida law mandates that licensed AAs practice only under the direct supervision of a physician anesthesiologist. It only makes sense that the supervision of unlicensed AA trainees be held to the same standard.

35. No provision of the Nurse Practice Act or the rules of the Board of Nursing authorize a certified registered nurse anesthetist to supervise an unlicensed AA trainee in the administration of anesthesia.

WHEREFORE, Petitioner requests a declaratory statement by the Board of Nursing that the supervision of an unlicensed anesthesiologist assistant trainee in the administration of anesthesia by a certified registered nurse anesthetist is not authorized by Florida law, and would constitute a violation of one or more provisions of Chapters 456 or 464, Florida Statutes, and Rule 64B9, Florida Administrative Code.

Respectfully submitted this 26th day of April, 2006.


James W. Linn
Florida Bar No. 0312916
Glenn E. Thomas
Florida Bar No. 0489174
Lewis, Longman & Walker, P.A.
Post Office Box 10788
Tallahassee, FL 32302
(850) 222-5702
(850) 224-9242 (Fax)

Attorneys for Petitioner

Bolden, Kimberly

From: John Garrison [John_Garrison@oag.state.fl.us]
Sent: Wednesday, May 03, 2006 9:59 AM
To: Bolden, Kimberly
Subject: Re: FW: CRNA Declaratory statement

Kim - Lee Ann instructed yesterday that this Petition for Declaratory Statement of Paul Dow should be filed with the Clerk bearing the date of April 26, 2006. This will involve backdating, but the Clerk Amy Carraway said it could be done because the Petition was received on that date by MQA. Please go ahead and file the petition copy you have with this date and it will be put for public notice with that same date.

Thanks

John Garrison

<Kimberly_Bolden@doh.state.fl.us>
05/02/2006 04:41 PM
To
<JoeJr_Baker@doh.state.fl.us>, <Donna_Rooks@doh.state.fl.us>
cc
<Rebecca_Keaton@doh.state.fl.us>, <John_Garrison@oag.state.fl.us>
Subject
FW: CRNA Declaratory statement

The Declaratory Statement was sent to Patricia Dittman and received by "HMQACB" on April 26. Mr. Garrison will fax us a copy to us. Lee Ann Gustafson has set this Declaratory Statement to be included in the Agenda for the June Board meeting.
(Thanks John and Becky for educating me on this issue!)

Thank you,
Kimberly Bolden
Program Operations Administrator
Board of Nursing

BEGIN-ANTISPAM-VOTING-LINKS

FAX TRANSMISSION

OFFICE OF THE ATTORNEY GENERAL

PL 01 The Capitol
Tallahassee, FL 32399-1050
(850) 414-3300
Fax: (850) 922-6425

To: Kim Bolden, PA
Board of Nursing

Date: May 3, 2006

Fax: 850-245-4172

Pages: 11, including this cover sheet.

From: John Garrison, DOH
Paralegal
850- 414-3706

Subject: Paul Dow, CRNA - Declaratory Statement

COMMENTS:

Kim - Here's the material I promised to send so that you can have the petition filed with the clerk. Please confirm that the filing has been taken care of.

Thanks

John Garrison

Please call John Garrison at (850) 414-3706 if you do not receive all pages. Thank you.