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Sent: Tuesday, March 24, 2026 2:48 PM
To: House Health and Human Services Committee; Rep. Donovan, Susan R; Rep. Giraldo, Joshua J.; Rep. Potter, Brandon C.; Rep. Casimiro, Julie A.
Cc: Nicole McCarty; Lynne Urbani; Julie Lefebvre; willfarrell@wafarrell.com
Subject: H8135 - Letter - Support with Amendment - Laura Turini, Rhode Island Association of Nurse Anesthetists

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March 24, 2026

The Honorable Susan R. Donovan
Chair, House Committee on Health and Human Services
Rhode Island State House
Providence, RI 02903

Re: Support and Amendment to H8135 – Inclusion of Certified Registered Nurse Anesthetists (CRNAs)

Dear Chair Donovan:

I write in support of H8135 and to respectfully request your consideration of a targeted amendment to H8135 to ensure that certified registered nurse anesthetists (“CRNAs”) are included within the provider classes entitled to equal reimbursement under the legislation.

As currently drafted, H8135 extends reimbursement parity to nurse practitioners and physician assistants, but does not include CRNAs. This omission is significant given both the essential role CRNAs play in delivering anesthesia services across Rhode Island and the ongoing challenges surrounding equitable reimbursement for those services.

The need for clarity is underscored by the interpretation of Rhode Island General Laws § 27-18-48(c) by the Office of the Health Insurance Commissioner (“OHIC”). In correspondence between the Rhode Island Association of Nurse Anesthetists and OHIC, OHIC has taken the position that insurer practices reducing reimbursement for CRNA services, including those billed using the QZ modifier, do not violate state law.

That interpretation is inconsistent with the General Assembly’s 2015 addition of subsection (c), which established a clear nondiscrimination standard prohibiting differential treatment of providers acting within their lawful scope of practice, except where justified by quality or performance measures. Reimbursement reductions applied solely on the basis of provider type, rather than objective quality or performance, undermine the statute’s purpose and effectively permit the very discrimination the law was intended to prevent.

In light of this, H8135 presents an appropriate and timely opportunity to clarify legislative intent and

ensure that reimbursement parity applies consistently across similarly situated advanced practice providers, including CRNAs. This amendment - which we can draft and submit to the committee shortly - is consistent with the bill's existing structure, and does not expand scope of practice. Rather, it ensures that when CRNAs provide covered services within their licensure, they are reimbursed on the same basis as other providers performing the same services.

Thank you for your consideration of this amendment and for your leadership on issues impacting access to high-quality, cost-effective care in Rhode Island. I would welcome the opportunity to discuss this further.

Respectfully submitted,

Laura Turini

President, RIANA (Rhode Island Association of Nurse Anesthetists)

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