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Memorandum

TO: Hospital Chief Executive Officers
Hospital Chief Medical Officers
Hospital Chief Nursing Officers

FROM: Elizabeth Daake Kelley, MPH, MBA, Director
Bureau of Health Care Safety and Quality

SUBJECT: Integrating Anesthesia Staff and Anesthesia Machines into COVID-19 Intensive Care Work Streams

DATE: April 2, 2020

The Massachusetts Department of Public Health (DPH) continues to work with state, federal and local partners on the outbreak of Coronavirus Disease 2019 (COVID-19), caused by the virus SARS-CoV-2, and we continue to appreciate the essential role you have in responding to this evolving situation. At this time, DPH does not have any ventilators despite requests to the federal government and we urge all hospitals to utilize and optimize the ventilators at their facilities immediately. We have included guidance documents to help with this process.

Hospitals should immediately identify any anesthesia ventilators, transport ventilators, and non-invasive ventilators in their organizations that can potentially be used for COVID-19 clinical management, ensure they are in proper working order, ensure they are available to use for the care of patients who need ventilator support, and ensure there are adequately trained staff to operate these resources. DPH understands that a portion of these ventilators need to also be utilized for managing non-COVID19 critical care.

The Centers for Medicare and Medicaid Services (CMS) waived requirements under 42 CFR §482.52(a)(5), §485.639(c) (2), and §416.42 (b)(2) that a certified registered nurse anesthetist (CRNA) is under the supervision of a physician in paragraphs §482.52(a)(5) and §485.639(c)(2). These waivers will allow CRNAs to function to the fullest extent of their licensure.

Accordingly, DPH recommends the integration of CRNAs and anesthesiologists into hospital emergency preparedness planning and the intensive care clinical workforce as health care professionals who are able to manage patients who require ventilator or anesthesia support.

The following guidance documents are important and will be helpful:

Health and Human Services, “Optimizing Ventilator Use during the COVID-19 Pandemic”

Available here: <https://www.hhs.gov/sites/default/files/optimizing-ventilator-use-during-covid19-pandemic.pdf>

American Society of Anesthesiologists, “APSF/ASA Guidance on ^[1]_[SEP] Purposing Anesthesia Machines as ICU Ventilators”

Available here: <https://www.asahq.org/-/media/files/spotlight/anesthesia-machines-as-icu-ventilators-4-1-update3.pdf?la=en&hash=3F73C1E7D970D39DE191E7EBD9751F55A5E0846F>

FDA, “Ventilator Supply Mitigation Strategies: Letter to Health Care Providers”

Available here: <https://www.fda.gov/medical-devices/letters-health-care-providers/ventilator-supply-mitigation-strategies-letter-health-care-providers>

We assure you that we are continuing to pursue additional ventilators from the federal stockpile every single day. We will be sure to update you as soon as these are obtained.