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To whom it may concern:

I am writing in response to the proposed increase in required contact hours from 15 to 30 for respiratory therapists for license renewal. I do not know of any supporting evidence that this is going to improve patient care or clinical outcomes. The NBRC requires 6 contact hours per year for those who need to re-credential. While we all can agree that continuing education is a good thing it is not clear to me that doubling the hours required and adding 8 mandatory mostly non-technical topics is necessary. When reviewing the contents of several of the most well regarded and popular conferences attended by my staff we found only 1 or 2 of the new 8 proposed required topics. Medicine changes so quickly we need the emphasis on clinical issues.

The primary people who are responsible for ensuring staff competency are their department directors, supervisors and educators. There are mandatory annual educational requirements in our facility that address several of the proposed mandatory topics such as ethics, patient safety, infection control etc. as I am sure other facilities do also. It is up to employers and supervisors to ensure their employees demonstrate ethical and professional behavior. Rather than mandate all 8 of these topics be included every license period it would seem more reasonable to just have them be included as acceptable to meet the existing requirement.

I see that recently the Board has voted to increase the therapist’s scope of practice in the areas of medication administration, arterial lines and vascular catheters. It would seem more appropriate to me to continue to have the emphasis on clinical practice for continuing education, especially now where there are additional competencies that may apply.

We have a relatively small department and it can be challenging to give staff time off to go to specific conferences. Many employers are not paying for outside conferences. This adds a financial burden on the licensee.

I would ask the board to reconsider this proposal and if there is no compelling evidence that doubling the number of contact hours and mandating of these 8 specific topics will add to the quality of respiratory care delivered in this state to not enact this change.

Thank you for allowing me to comment.

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Addendum: A recent US News article that ranked states as best for healthcare had data compiled by McKinsey & Co. The states were ranked in the following categories: Access to Care, Quality of Care and Public Health. 3 of the top 10 states rated for best healthcare are states that require no contact hours for respiratory therapists to re-credential.

These 3 states: Hawaii, Colorado & Utah are also among the top 5 rated in just the quality category. Conversely 5 states that require 30 hours to re-credential, California, New York, New Jersey, South Carolina & Pennsylvania ranked 14th, 38th, 23rd, 35th & 20th respectively in the quality category.