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I am making this statement in response to the Mass Board of Respiratory Cares proposal to increase the number of continuing education contact hours required for license renewal. As of this date, July 16, 2018 a Respiratory Therapist licensed in MA is required to obtain 15 continuing education hours within the 2 year license cycle, the same requirement as a Registered Nurse license in MA. According to an Advisory the Board posted on June 20, 2017 The Board is proposing to double this to 30 hours and limit how many of those hours can be earned on line to only 15. It is my opinion that doing this will place an unfair financial burden on many licensed RT’s in the state as it is much more expensive to pay to attend a live conference than it is to do it online. It also presents a hardship for the RT who must take time out of work and away from family to attend a live conference. Often times this is earned time or unpaid time off. It should also be noted that attending a live conference requires the RT to sit in on lectures that may not necessarily be relevant to what they currently practice. For example if an RT is not working in an area with pediatrics sitting in on a one hour lecture on a pediatric topic because it is part of the agenda of a live conference, does not make that RT a better RT, it just adds another hour to the required amount needed for renewal. This Board should be basing decisions on continuing education in a way that will make the RT a better RT and allowing them to choose easily accessible educational opportunities that meet their professional needs while taking into consideration the impact on finances and family dynamics. Allowing RT’s to easily access up to date education in the areas they are practicing in is the most effective continuing education, not just taking continuing education to fill an unreasonable quota.

This brings me to my next point. The Board wants to double the number of education hours from 15 to 30 and I would like to ask what the motivating factor behind this drastic change is? My thorough review of the Mass Board of Respiratory Cares minutes going back as far as 2015 does not indicate any discussion of why the Board feels this is necessary. I have to ask if the entire Board feels doubling the continuing education is needed based on a conclusion they have made from reviewing regulatory cases before them that indicate more education is needed for all licensed RT’s in the Commonwealth? If the Board has identified significant regulatory issues regarding RT’s in the Commonwealth that they feel requires the doubling of continued education then why has the Board only met twice since January of 2018?

In 2015 the Mass Board of Respiratory Care removed the limit of how many hours of continuing education an RT could earn online making the process far more affordable and convenient for Respiratory Therapists. I proposed this change to the Board after having a discussion with an RT who was employed by me at the time. She was a single Mother of three young children working 2 RT jobs to support her family. She disclosed to me that it was very difficult for her to take unpaid time out of work and pay for child care to attend a live conference and then have to pay so much for the conference when she could get free continuing education on line, at home, in topics that would benefit the area she was working in. I agreed that, considering these things, it seemed very unfair that an RT was being held to a different professional standard than an RN. Statistically RN’s make more money than RT’s in the state of MA and yet an RN was and IS still able to obtain all of their 15 continuing education hours online in an affordable manner that considers many family dynamics. In fact a Registered Nurse Practitioner in the State of MA is required to obtain 75 continuing education hours every 5 years which equates to 15 per year and they can obtain all of them online. The proposal the Board of Respiratory Care is considering will require a respiratory therapist to get the same amount of continuing education as a Nurse Practitioner and I think we can all agree that makes no sense at all.

During the Board discussion to remove the limit on how many continuing education hours an RT could earn online in 4/2015, former Board of Respiratory Care Chairman Polnick made a motion to remove the cap of continuing education hours an RT could earn online allowing RT’s to earn them anyway they chose as long as they met the required 15 per 2 year renewal cycle. All members present voted yes to that change except Mr. Nuccio. During Board discussion of this current proposal Mr. Nuccio responded to Atty Strachan’s concern that this proposal could present a financial hardship for some licensee’s. Mr. Nuccio said it would not present any hardship as there are many free continuing education opportunities online. He also pointed out there were many free available with a membership to the AARC (American Association of Respiratory Care). It should be noted the annual cost to be a member of the AARC is approximately 90.00 so it is not free. Doubling the required number of continuing education hours and limiting how many can be obtained online will place an unfair financial burden on our profession.

It should also be noted that in 2015 the Mass Board of Respiratory Care provided a report of a random CEU audit. This report found that of the 306 audit letters they sent out 115 were unreachable or unable to verify they were in compliance with the continuing education requirements. That is 37.5 % of the RT’s notified were not in compliance. Since that time the Board has not publicly identified ways to increase compliance with licensees but rather proposes to double the required amount needed and make it more expensive and more difficult to get them. I think if the intent of this proposal is to improve our profession, as no other reasons have been publicly provided, the Board would be better served to hold licensees accountable by providing documented proof of the current 15 continuing education hours within a specified time frame from renewal application. This way the expense of providing that proof rests with the licensee not the Commonwealth. A licensee would still be able to renew online but would be required to provide proof of continuing education either electronically or by mail. This would require ALL licensees to be in compliance and make it clear to the Commonwealth who is not by those who do not provide proof of attendance. If the Mass Board of Respiratory Care wants to make continuing education a priority then they should require licensee’s provide proof of CRCE with renewal, especially since it is obvious based on your own 2015 random audit that many licensed RT’s were not in compliance. Doubling the amount needed and making it more expensive and difficult to obtain will not make RT’s better in the Commonwealth. Limiting how many continuing education hours can be earned on line will benefit those organizations and business’ that sell continuing education. One that comes to mind is the Massachusetts Society of Respiratory Care (MSRC). They hold an annual conference where attendees buy continuing education. The cost to attend the two day conference can be hundreds of dollars per RT and also require travel expenses for those coming from areas of the state that make a daily commute difficult. Ms. DeSilva was a Board member of the MSRC just one month prior to becoming a Member of the Board of Respiratory Care so I am certain she can provide insight to the Board about the significant amount of money the MSRC generates each year selling continuing education. Limiting the number of continuing education an RT can earn online will force RT’s to attend costly live conferences rather than making it an option as it currently is now.

I hope that the Board of Respiratory Care will reconsider all things when moving forward with this proposal. I hope each of you will reconsider the financial burden this will place on RT’s throughout the Commonwealth. I hope each of you will reconsider the scheduling issues it will present to managers to allow for time off for RT’s to attend live conferences often times all at a similar time of year. I hope each of you will reconsider how this compares us to our other professional peers within the Commonwealth particularly nurses. Ms. Cavallaro, as a Board member and an RN I hope you will reconsider the impact this will have on RT’s who will not be able to obtain CEU’s in the same affordable and convenient manner you are and ask yourself why the different standard for an RT?

The Massachusetts Board of Respiratory Care is responsible to regulate our practice and enforce the laws established by our Legislature and I appreciate what they are tasked to do. I hope that this portion of that task will allow you to hear from those of us who practice daily and know the hardship this proposal will create for the thousands of licensed RT’s throughout the Commonwealth. I hope that as a Board of educated professionals you will consider all that you have heard and take all things into consideration when moving forward.

Thank you for this second public opportunity to provide feedback on this important matter. I know along with many other RT’s I will be eagerly watching and listening to your next meeting to hear your thoughts and rational on this proposal moving forward.

Thank you,

 Holly Saurman