Department of Health and Human Service

Bureau of Health Professions Licensure

Board of Registration of Respiratory Care

239 Causeway Street

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Boston, MA 02114

To the members of the BORRC,

I have a few comments regarding the proposed changes to 261 CMR.

After reading the proposed changes to 261 CMR, I was glad to see that the BORRC has not dictated what type of educational activity or program is acceptable in the process of fulfilling contact hour requirements. I have found internet courses much more valuable than attending costly conferences in my effort to maintain my knowledge and skills as a Respiratory Therapist.

A recent “Advisory on Continuing Education Requirements” from June 2017 from the MSRC, suggested that with the proposed changes to 261 CMR the board would require 15 contact hours be obtained from a seminar or workshop activity and that certain subjects were also required.

I would be against the board dictating that part of the contact hours be obtained from attending a seminar/workshop or dictating required subjects. I feel that I know what form of continuing education and what subject I need to increase my effectiveness as a RT. This decision should be left to the individual therapist, not the board.

Increasing the required contact hours from 15 to 30 seems a bit excessive because RN’s in Massachusetts are only required to obtain 15. 20 contact hours would be more reasonable and affordable for Massachusetts RT’s.

For many years I was an RT clinical educator and would provide contact hours to my staff for educational programs that we developed. I only got approval from the AARC/MSRC when I organized a large seminar for community RT’s. The removal of section 5.05 makes it seem that all seminar/conference/lecture- type educational activity done internally (hospital based) would have to be approved by the AARC/MSRC. This would stifle this type of continuing education done on a local level and increase the cost of providing this type of program. I hope that the board clarifies this issue with the changes to the regulation.

Respectfully Submitted,

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