The Commonwealth of Massachusetts

Executive Office of Health and Human Services

Department of Public Health

Bureau of Health Professions Licensure

Board of Registration of Respiratory Care

239 Causeway Street

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To: The Board of Registration of Respiratory Care:

I am writing to you regarding the Board’s proposed revision to its regulations at 261 CMR 5.00.  My understanding, is the Board is proposing an increase in the amount of Continuing Education Units (CEUs) required for Respiratory Therapists.

Respiratory therapy departments are experiencing a shortage currently in our area. Increasing the required CEUs will have a great impact on our hospitals and therapists which ultimately affects our patients.

Considering the shortage of Respiratory Therapists, trying to find coverage for shifts to allow these therapists to attend conferences will be a true challenge. Making it a mandatory requirement will cause hospitals to run with below minimum staffing which directly affects our patients’ care.

The salary of a Respiratory Therapist does not support the cost of CEUs. Many therapists find it difficult to pay for their current requirement of 15 CEUs. I see many of my coworkers working two or more per diem jobs to support their families.  If this change occurs, it would more than double the expense for CEUs, the therapist would lose per diem hours to attend a seminar and pay daycare without working to support the daycare expense.  When choosing a healthcare field and comparing positions, salary, and future requirements to maintain a license, Respiratory would fall below others as a choice, further diminishing the Field.

Nursing requires 15 CEUs in Massachusetts and all can be done on-line. The salary is markedly higher as well. In an age of expanding on-line degree programs, why are we being asked to return to seminars? Attending seminars are much more costly than those offered on-line.  On-line CEUs diminishes the time out of work, cost, disruption to families, and burden on hospitals to accommodate time off.

I sincerely ask that you consider these issues before changing the current CEU program.

Respectfully submitted

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