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

Suite 500

Boston, MA 02114

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.

Hospitals and other healthcare providers throughout the Commonwealth are currently experiencing a shortage of Respiratory Therapists. Were the Board to increase the required CEUs, it would have a significant and negative impact not only on therapists, but also our hospitals and by extension the quality of care we are able to our patients.

Considering the shortage of Respiratory Therapists, trying to find shift coverage to allow therapists to attend conferences will be a considerable challenge. Making it a mandatory requirement to attend a conference in person, specifically, will cause hospitals to run with below minimum staffing and negatively impact our patients’ care.

The salary of a Respiratory Therapist does not support the cost of an increased CEU burden. Many therapists strain to afford their current requirement of 15 CEUs. Many workers piece together part time and per diem jobs to support their families. If this change occurs, it would more than double the expense for CEUs, and many therapists would be forced to lose per diem hours or attend a seminar on an off day. On top of lost wages, this would incur other costs, such as lost wages for per diem work, but also additional daycare and travel costs for those attending conference on off days. Further, there has been no explanation as to how this expansion of required CEU’s will benefit our profession or our patients. When choosing a career in the healthcare field – comparing positions, salary, and future requirements to maintain a license, Respiratory Therapy would fall below others as a choice, further diminishing the field of potential workers.

By comparison, nursing requires 15 CEUs in Massachusetts, 100% of which can be done on-line. Nursing salaries are also markedly higher than those earned by Respiratory Therapists. In an age of expanding on-line degree programs, videoconference and telecommuting, why are we being asked to return to seminars, likely in locations like Boston which will require long and challenging commutes? Attending seminars is costlier to both Respiratory Therapists and our hospitals. On-line CEUs diminish the time out of work, decrease cost, minimize disruption to families, and ease the burden on hospitals to accommodate time off, while providing the information needed to maintain and grow our skills.

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

Respectfully submitted,

Matt Lyford

Administrative Organizer

1199SEIU