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**To:** [DPH-Testimony, Reg (DPH)](mailto:RTestimony@MassMail.State.MA.US)

**Subject:** BORRC: 261 CMR

**Date:** Thursday, July 12, 2018 2:22:43 PM

Please consider the following as you debate to amend 261CMR 5.0 from 15 to 30 CEUs.

1. The requirement that 8 each of the 30 CEUs contact hours must be in eight (8) specific subjects.
   1. How will the Board ensure that there are reasonable numbers and opportunities to attend one each of the eight (8) specific subjects over the course of the license renewal period, either on line, in- person live training sessions, seminars or conferences?
   2. The requirement that 15 contact hours must be acquired by attendance at in-person, live training sessions, seminars or conferences.
      1. What is the rational and/or reasoning behind this requirement?
      2. In this electronic age, the convenience of on-line training outweighs in-person, live training sessions, seminars or conferences.
      3. Consider that a student may obtain an AS in Respiratory Care from an online course, except for the clinical portion which must be done in-person (at bedside) and is eligible to obtain a MA. Respiratory license. This is contradictory to what is being proposed.
      4. The cost of on-line training most likely will be below in-person, live training sessions, seminars or conferences, factoring in travel cost, child care, meals, and possibly hotel expense. Most employers no longer cover / reimburse these types of educational expenses or they are deminimus and limited.

Thank you for allowing Respiratory Therapist to weigh in on the proposed amendment of 261CMR 5.0.

Sincerely,

Michael F. Cornelius, RRT, JD