July 31, 2018

To whom it may concern,

I am writing this letter regarding the proposed changes to 261 CMR 5.00. This regulation sets provisions for continuing education requirements for Respiratory Therapist licensure.

Among others changes, this proposal increases the current requirement of 15 CEUs every two years to 30 CEUs every two years. I am against these changes.

I feel the current 15 CEU requirement is adequate. Doubling the requirement could pose financial difficulties for some RTs as historically our salaries are NOT near the top of hospital clinician’s salaries.

Also, a potential problem is with work scheduling and staffing. My experience over the years it is was not easy to provide time off to all of our approximately 50 employees and maintain adequate staffing. Doubling the requirements would exacerbate these concerns.

I understand other states have already increased their CEU requirements to 30. I do not know with certainty, but would be interested in any documented improvements in any relevant hospital quality measures in these states.

Sincerely,

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