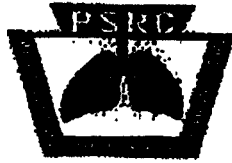


Original; 2494



The Pennsylvania Society for Respiratory Care

November 4, 2005

Pennsylvania Board of Medicine
PO Box 2649
Harrisburg, PA 17105-2649

SUBJECT: RESPIRATORY RESPIRATORY CARE CONTINUING EDUCATION

**RE: PENNSYLVANIA BULLETIN, VOLUME 35, NUMBER 41, PAGES 5520-5521 & 5523-5524
SATURDAY, OCTOBER 08, 2005**

PROPOSED RULE MAKING: STATE BOARD OF MEDICINE & STATE BOARD OF OSTEOPATHIC MEDICINE

As I am sure you are aware, on Friday, July 02, 2004, Governor Edward G. Rendell signed into law Senate Bills No. 751 and No. 752 which require individuals holding certification as Respiratory Care Practitioners (RCPs) in the Commonwealth of Pennsylvania to attend and complete 20 hours of mandatory continuing education during each two-year certificate period.

Under the new law the Pennsylvania State Board of Medicine and the Pennsylvania State Board of Osteopathic Medicine will refuse to renew a certificate issued to a respiratory care practitioner unless he/she has completed 20 credit hours of approved continuing education offered by providers approved by the State Board of Medicine and the State Board of Osteopathic Medicine.

It has been brought to the attention of the Board of Directors of the Pennsylvania Society for Respiratory Care (PSRC), that the legal counsel of the Pennsylvania Board of Medicine is interpreting the words, attend and complete, as applying only to live, traditional continuing education opportunities. This interpretation is, in the opinion of the Board of Directors of the PSRC and of numerous respiratory care practitioners and respiratory care departments in the Commonwealth of Pennsylvania, is contrary to the intent of the law.

By its very definition the word, attend, means to be present at or to listen to or heed. Neither of these definitions infers a live presentation e.g., one can attend a movie or taped presentation. It is in this regard that we are asking the Pennsylvania Board of Medicine to liberalize the interpretation of the regulations to include a combination of traditional and non-traditional continuing education methods.

Traditional education methods could be a "live" presentation in which there is the ability to have direct interaction with a presenter e.g., a live web cast, teleconference or a traditional classroom educational presentation.

Non-traditional education methods could range from pre-recorded presentations to internet-based presentations to journal review programs.

The Commonwealth of Pennsylvania acknowledges and recognizes the Entry Level CRT Examination of the National Board for Respiratory Care (NBRC) as its accrediting examination for the legal credential of RCP (Respiratory Care Practitioner). The NBRC in turn, has a Continuing Competency Program which demonstrates its compliance with the accreditation standards of the National Commission for Certifying Agencies (NCCA). This program permits respiratory care practitioners to provide proof of completion of a minimum of 30 hours of Category I Continuing Education (CE) acceptable to the NBRC. Category I Continuing Education is defined as participation in an educational activity directly related to respiratory therapy or pulmonary function technology, which includes any one of the following: lecture, panel, workshop, seminar,

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symposium, or distance education.

By requiring Respiratory Care Practitioners to only be able to earn continuing education credits by attending live presentations would place a financial hardship on individual respiratory care practitioners, respiratory care departments, and hospitals. The trickle down result could potentially have an adverse affect on patient care.

We all know there is a nationwide nursing shortage, however, according to the Bureau of Labor Statistics, the field of respiratory care is expected to grow at a rate of twice the average growth of all occupations. If respiratory care practitioners are required to earn all 20 CEU's at live presentations, many of them may not be able to renew their legal credentials because of a lack of "live" educational opportunities or the inability to remove themselves from the work environment to attend these presentations.

Last and certainly not least, if the Pennsylvania Board of Medicine decides that only live CEU's would be acceptable to fulfill a respiratory care practitioners' continuing education requirements, Pennsylvania would be the only state that currently would not recognize non-traditional methods of continuing education.

The Board of Directors of the PSRC submits the following recommendations:

A combination of traditional and non-traditional CEU's (50% of the continuing education units must be from traditional means and 50% from non-traditional means) to total 20 in a 2-year renewal period. Of these 20 CEU's we propose at least one CEU be in the category of Ethics and one CEU be in the category of "Patient Safety".

In closing, we ask The Board of Medicine to review the information presented and make a decision based on this information, which would be in the best interest of the Respiratory Care Profession and most importantly our patients.

Thank you very much for allowing us to present this information to you!

Sincerely,



John Conrad, BS, RRT-NPS, RCP
2005 Legislative Affairs Chairperson
2005 President-Elect
Pennsylvania Society for Respiratory Care

Enclosures

Original: 2494

**Soldiers + Sailors Memorial Hospital**32-38 Central Avenue
Wellsboro, PA 16901-1899(570) 723-7764
Fax: (570) 724-7235

Sabina I. Howell
Board Council, State Board of Medicine
PO Box 2649
Harrisburg PA 17105-2649

November 3, 2005

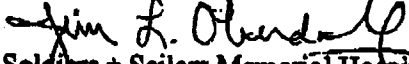
Dear Ms. Howell,

I am a Director of a Respiratory Care Department in a small community hospital in north central PA and writing you this letter about the CEU's required for Respiratory Therapists. It is good that CEU's are now necessary in the practice of Respiratory Care to mandate all therapists make efforts to keep current in their profession. The concern I have is that, "the PSRC and PA State Board of Medicine continue to recommend that any therapist who wishes to complete some or all of their continuing education hours do so at LIVE events that are approved for continuing education by the AARC, AMA (category I), AOA, or CSRT until final regulations are published that allow non-traditional forms of continuing education."

Due to both our location and budget constraints, it may be very difficult for all of our staff to attend or participate in enough "LIVE events" to achieve their 20 CEU's in the two year period. It would be helpful, and I do not believe it would compromise the quality of continuing education if other non-traditional programs were allowed. An example would be the "AARC's Professors Rounds, which allows a therapist to watch a one hour long DVD, take and pass a test. The amount of CEU's that one could get through a program like this should be limited to 8 or 10 in a two-year period.

One last concern would be the total amount of CEU's that one could get by taking ACLS, PALS and NCLS courses. Maybe consider a limit of 12 in that area in a two-year period.

Thank you for your time reviewing these concerns I have as well as many of my colleagues.

Jim L. Oberdorf, RRT, RPFT
Director of Cardiopulmonary Services

Soldiers + Sailors Memorial Hospital
32-36 Central Avenue
Wellsboro, PA 16901
570-723-0111

Original: 2494

Gentzler, Deb

From: IRENEBUDS@aol.com
Sent: Friday, August 12, 2005 12:37 PM
To: Brightbill, Senator David
Subject: RE: CONTINUING EDUCATION REQUIREMENTS FOR RESPIRATORY THERAPISTS

Dear Mr. Brightbill,

I am a licensed Respiratory Therapist in the state of PA. The new licensing requirements for my respiratory license requires me to obtain 20 hours of continuing education in the respiratory field. I have no objection to these requirements, however, I am not allowed to do these credits online. The Medical Board informs me I must attend a class. The doctors do not have to attend a class and they may obtain their continuing education online. I feel this is very unfair. The classes are very expensive and we do not make near the amount per hour as a doctor. Also, I work 11pm to 7am. In order to attend a class that is only offered during daytime hours, I will have to go without sleep. There is also nothing offered as far as a class to attend in this area. Now, I will not only have to be deprived of my sleep, I will have to take time off of work and travel which will add to the expense of have to attend a class.

Is there anything you can do to help?

Sincerely yours,
Alice I Homey

456 N. 5th St.
 Lebanon

RECEIVED

Please prepare response for my attention.
 Please prepare response to the Secretary's attention.
 Please show this report by: 10/31/05
 Please refer to my proposal.
 No response.
 SPECIAL INSTRUCTIONS:
 5/1/

8/17/2005

Original: 2494

November 8, 2005

Sabina Howell, Esq.
Board Counsel
PA State Board of Medicine
PO Box 2649
Harrisburg, PA 17105

Dear Ms. Howell,

As a concerned Respiratory Care Practitioner in the State of Pennsylvania, I am asking that the existing law regarding Continuing Education Unit's or CEU's be revised to allow some of the 20 credits to be non-traditional. I feel a 50/50 split would meet the needs of everyone concerned.

I work in a small hospital in Northcentral PA and would find it very difficult to have to attend and complete 20 live CEU's, both budget and time wise due to our location. I am very much in favor of the idea of CEU's because our profession should be at the forefront of continuing education. I am a member of my professional society, the AARC and also a member of the PSRC.

Non-Traditional credits can be web-based, journal-based, or even home study, but should involve some aspect of Respiratory Care. I hope that this change can and will be considered for the benefit of all Respiratory Care Practitioners in the State of PA.

Thank you in advance for your consideration.

Sincerely,



Michele S. Comes, RRT-NPS, RPFT, AE-C

Michele Comes
PO Box 214
Knoxville PA
37924