

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Respiratory Care Practitioner Program - Sunset Advisory Commission Recommendations
Date: Friday, June 13, 2014 4:42:42 PM

Importance: High

From: Carpenter, Michael E
Sent: Friday, June 13, 2014 1:17 PM
To: Sunset Advisory Commission
Subject: Respiratory Care Practitioner Program - Sunset Advisory Commission Recommendations
Importance: High

Greetings Texas Sunset Advisory Commission Members,

I am a licensed Respiratory Care Practitioner (RCP) in the state of Texas. There are presently 14,614 licensed respiratory care practitioners in Texas. In May 2014, the Sunset Advisory Commission Staff Report recommended to discontinue 19 regulatory programs currently housed at the Department of State Health Services (DSHS) which includes Respiratory Care Practitioners Program (Page 4, Issue 3 and Pages 106-108, Appendix E). Licensed RCPs' must complete a specialized, college-based educational training program from an accredited college, and must successfully complete a national credentialing process consisting of rigorous examinations before they are eligible to apply for a state license.

The accreditation body for Respiratory Care, [Committee on Accreditation for Respiratory Care](#) (COARC) and the credentialing body, [National Board for Respiratory Care](#) (NBRC) **DO NOT** provide the functions served by state licensure. They lack the legal authority of state licensure boards and cannot check criminal and abuse backgrounds of individuals practicing Respiratory Care in the state of Texas. They have no legal power to regulate and to monitor the ongoing competence of Respiratory Care Practitioners in the patient care setting. The RCPs' are regulated by the Texas Respiratory Care Practitioners Program with the DSHS.

The scope of practice for a licensed RCP is complex. The following are just a few procedures in an RCP's scope of practice:

- Directly manages highly technical mechanical ventilators providing necessary life support for patients who are unable to sustain life on their own.
- Routinely administers prescription medications, including bronchodilators, antibiotics, analgesics, and opioids.
- Assists the physician in diagnosing cardio-pulmonary disease by performing diagnostic procedures and patient assessment
- Performs CPR in all types of health care facilities and on patients of all ages
- Administers medical gases such as oxygen, nitric oxide and helium
- Provides counseling and rehabilitation to patients with cardio-pulmonary diseases
- Functions as members of the Extracorporeal Life Support team

- Works with critically ill patients in all intensive care units (ICUs)
- Serves as an invaluable member of land and air transport teams.
- Valuable members of hospital Cardiac Code and Rapid Response Teams providing life sustaining CPR and respiratory support

There are numerous reasons to not deregulate RCPs'. Public health and safety is our greatest concern. Licensed RCPs' are direct patient care providers in a profession where extensive specialized skills and training are required and a significant potential risk of harm to the public exists from lack of training education and incompetence. The lack of a formal state licensure process in Texas would mean that RCPs' whom are incompetent, engaged in criminal activity, or have lost their license to practice in another state can work in Texas without any review or screening to protect the citizens of Texas. I have attached copies of letters asking you to change your recommendation regarding the Respiratory Care Practitioner Program from our State and National professional organizations as well as two from non-profit organizations that support citizens suffering from various respiratory diseases.

I humbly ask you not to deregulate RCPs', and for the Respiratory Care Practitioners program to either remain with the DSHS or to be transferred to the Texas Department of Licensing and Regulation.

Respectfully submitted,

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