

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 12, 2014 8:05:47 AM

-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 11, 2014 8:54 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 11, 2014 - 20:53

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Louise

Last Name: Lewis

Title:

Organization you are affiliated with:

City: Joshua

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or
Opposed:

With this move, Texas will fall drastically behind the rest of the nation with the level of professionalism and care expected by respiratory care practitioners. Recently, the National Board for Respiratory Care, the governing association for respiratory professionals, has moved to increase educational requirements by mandating a bachelor's degree to work in the field, the exact opposite of what Texas is proposing.

Make no mistake; the elimination of licensure will decimate the Respiratory Care profession and patient health. There will no longer be a requirement that therapists maintain up-to-date training and education. Lack of licensure undermines the professionalism of current respiratory care practitioners, undervaluing their education and learned skills. Most importantly, the skill level of those providing care for respiratory patients will plummet, jeopardizing patient health and safety.

The NBRC does not regulate RCPs', but provides the credentialing examinations. The next step taken is to apply for a Texas License from the DSHS. Before obtaining a license, the DSHS will make sure the individual does not have a criminal history and all requirements to obtain the license and work as an RCP have been met.

The following are just a few components in the RCPs skill set:

- Directly managing highly technical mechanical ventilators to provide necessary life support for patients who are unable to sustain life on their own. These ventilators breathe for patients who cannot breathe for themselves or who need assistance to breathe.
- Understand the indications, hazards, contraindications, and dosages of prescription medications, including bronchodilators, antibiotics, Mucolytics, and steroids. These medications are provided to patients with lung disease such as Asthma and Chronic Obstructive Pulmonary Disease (COPD).

- Assist the physician in diagnosing cardio-pulmonary disease by performing diagnostic procedures and patient assessment
- Performs cardiopulmonary resuscitation (CPR) on patients of all ages whom are dying
- Administer medical gases such as oxygen, nitric oxide and helium
- Provide counseling to patients with cardio-pulmonary diseases
- Work with critically ill patients in all intensive care units (ICUs)

Any Alternative or New Recommendations on This Agency: There are numerous reasons to not deregulate RCPs'.

Public health and safety is of 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. Without the licensing requirement, hospitals and other patient care providers would not be required to hire individuals who met all the requirements described above.

Additionally, individuals engaged in criminal activity, or have lost their license to practice in another state could work in Texas without any review or screening to protect the citizens

of Texas. My recommendation is not to deregulate RCPs', but for the

Respiratory Care Practitioners program to either remain with the DSHS or to be transferred to the Texas Department of Licensing and Regulation. Any potential financial savings will be offset by the loss of life that is sure to occur.

We require licenses for nail salons, vet techs, hair salons and HVAC service so we should assure all patients that the state takes their well-being as seriously as we do their haircuts!

My Comment Will Be Made Public: I agree