



AMERICAN ASSOCIATION FOR RESPIRATORY CARE
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May 1, 2012

The Honorable Rick Snyder
P.O. Box 30013
Lansing, Michigan 48909

Dear Governor Snyder:

As President of the American Association for Respiratory Care (AARC), a national professional association representing over 53,000 respiratory therapists including the interests of the more than 5,000 respiratory therapists in Michigan, I urge you to consider the following statement.

The AARC categorically opposes the recommendation by the Michigan Office of Regulatory Reinvention Recommendations to rescind mandatory state licensure for Michigan respiratory therapists.

The recommendation by the Office of Regulatory Reinvention Recommendations would repeal the formal state licensure oversight process and inappropriately place that responsibility with the National Board for Respiratory Care (NBRC), a voluntary credentialing organization.

In a separate letter to your Office, dated April 25, 2012, the NBRC has unequivocally stated it is not structured to assume the responsibilities required by all states when licensing health care professionals.

As stated in the NBRC letter, it cannot check criminal and abuse backgrounds of individuals applying for its voluntary credentials. The NBRC is not in a position to legally enforce actions taken against therapists who commit practice offenses or demonstrate other behaviors that would cause someone to question the practitioner's ability to perform his or her duties in a competent and professional manner. Moreover, the NBRC has no investigative or subpoena powers to gather the information to fulfill this function.

AARC concurs fully with the concerns raised by the NBRC.

Respiratory therapy licensure in Michigan has been a success. Licensure has accomplished the intent of the legislature, that is, to protect the public safety and health from incompetent individuals rendering the complex cardio-pulmonary services and procedures that is the profession of respiratory therapy.

In 49 states the District of Columbia, Puerto Rico and Guam, the profession of respiratory therapy is regulated, that is, licensed by the state. Only Alaska at present has no state oversight of the profession. Alaska is in the process of addressing state licensure for respiratory therapists.

If Michigan were to repeal licensure, your state would become a refuge as the only state in the contiguous United States without respiratory therapy licensure. Michigan would become a magnet for individuals who do not meet the qualifications for licensure in their own states. Michigan would become a haven for those who have had their license rescinded or attract those who had committed an act that would render them ineligible for licensure in other states.

Rescinding respiratory therapist licensure equates to removing any state scrutiny of the individuals who will provide life sustaining respiratory therapy to the public. The NBRC's voluntary credential is not a substitute for legal state licensure.

The AARC urges you to use your authority as Governor to remove the profession of respiratory therapy from the list of health care professions recommended for de-licensing.

Respectfully,

A handwritten signature in cursive script that reads "Karen J. Stewart".

Karen J. Stewart, MSc, RRT, FAARC
President