



April 25, 2012

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

Dear Governor Snyder,

The NBRC has received a copy of The Office of Regulatory Reinvention Recommendations regarding Occupational Licensing in the State of Michigan. While the NBRC is pleased its competency testing and voluntary credentialing processes are apparently held in high esteem by the Advisory Rules Committee; it is gravely concerned that one of the recommendations was the deregulation of respiratory therapists.

The NBRC is a voluntary credentialing agency which lacks the legal power of state licensure boards, and while we work in partnership with state licensure entities, the NBRC cannot check criminal and abuse backgrounds of individuals applying for its voluntary credentials. State licensure agencies can perform these screenings on applicants for licenses to assure protection of the health and safety of their citizens. Further, 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 practitioners' ability to perform his or her duties in a competent and professional manner. The NBRC has no investigative or subpoena powers to gather the information to fulfill this function. The vast majority of actions taken by its Judicial and Ethics Committee involve charges referred after state licensure agencies have taken final actions regarding those individuals. The NBRC secondarily takes action regarding an individual's voluntary credentials in response to the actions taken by state licensure agencies.

The NBRC Board of Trustees will meet Saturday, April 28 to consider this matter. The NBRC will issue a more comprehensive response to the Office of Regulatory Reinvention's Recommendations at that time. The NBRC is shocked that the Report recommends the deregulation of the life sustaining profession of respiratory therapy. It is the opinion of the NBRC that deregulation of respiratory therapists would place the citizenry of the State of Michigan at severe risks for great harm.

Respectfully submitted,

Kerry E. George, MEd, RRT, FAARC
President

Gary A. Smith
Executive Director