



AMERICAN ASSOCIATION FOR RESPIRATORY CARE  
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February 5, 2015

The Honorable Mitch Greenlick  
900 Court St. NE.  
H-493  
Salem, OR 97301

**RE: HB 2305 Polysomnography Licensure**

Dear Chairman Greenlick:

As President of the American Association for Respiratory Care (AARC), a national professional association representing nearly 50,000 respiratory therapists including the interests of the more than 1,700 respiratory therapists in Oregon, we must oppose HB 2305. This legislation would re-instate the on the job (OJT) pathway as an acceptable avenue for sleep disorder personnel to obtain an Oregon license to practice the full scope of practice defined as polysomnography

Oregon recognized that individuals who were providing an array of sleep disorder services in a variety of health care sites, including sites that were not hospital based required state mandated regulation via the licensure process. Licensure was deemed essential in order to protect the health and safety of the citizens of Oregon.

The enactment of the polysomnography licensure law put in place mandatory standards for education and competency documentation. As noted above these education and testing standards were critical components that provide assurance to the public that licensed polysomnographic technologists are qualified and competent to render the full range of polysomnography services.

**If enacted, HB 2305 will undermine these essential standards.** The bill will revise the current law to allow individuals with a combination of “education and training” to obtain a polysomnography license. These words may appear benign but make no mistake this provision is clearly to allow for individuals to learn on the job, with no consistent curriculum or education standards. Oregon has two accredited polysomnography education programs, Linn-Benton Community College and Oregon Institute of Technology and these programs graduate 30 -40 polysomnographic technologists per year. Formally educated polysomnographic technologists are readily available for employment in Oregon. Allowing OJTs to again enter the workplace is neither necessary or in the best interests of the public health and safety.

The effort to re-instate an OJT pathway was first attempted in 2012 as a request to revise the polysomnography licensure regulations. After careful review of the purported rationale from the supporters of this far reaching change, the Joint Respiratory Therapist and Polysomnographic Technologist Licensing Board denied the request in keeping with its mandated responsibility to protect the health and safety of the public. Now the supporters of re-establishing an OJT pathway to polysomnography licensure have taken their failed regulatory effort to the Oregon legislature. This new legislative effort to mandate an on the job pathway to licensure must not succeed.

The AARC urges you and your fellow Committee Members to dismiss HB 2305 from further consideration or legislative action.

Respectfully,

A handwritten signature in black ink, appearing to read "Frank R. Salvatore, Jr.", written in a cursive style.

Frank R. Salvatore, Jr., RRT, MBA, FAARC  
President