



Legacy Health
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April 27, 2015

Senator Laurie Monnes Anderson, Chair
Members, Senate Committee on Health Care

RE: Legacy Health Supports House Bill 2305

Legacy Health is a major nonprofit health care provider in Oregon and Southwest Washington. With six medical centers throughout the Portland-Vancouver region, Legacy treats more than half a million outpatients annually and admits more than 56,000 people each year to our facilities.

Legacy is home to five Sleep Disorders Centers and employs 22 Polysomnographic Technologists. As such, we have a significant interest in the passage of House Bill 2305. The current pathways to Oregon Polysomnographic Technologist licensure unduly hinder the ability of Legacy and other Sleep Centers to hire qualified, experienced Polysomnographic Technologists.

Pathway One: Academic Degree requires the completion of an Associate's degree in polysomnography or the completion of a polysomnography course of study accredited by the Commission on Accreditation of Allied Health Education Programs (CAAHEP). While we fully support a combined education and experience requirement for Polysomnographic Technologists wishing to become licensed in Oregon, this is unnecessarily restrictive as Associate's degree and CAAHEP-accredited programs are just two of the numerous types of qualified and nationally recognized polysomnography education pathways.

Furthermore, the first CAAHEP-accredited programs began in 2006, meaning the most experienced polysomnography professionals will not have had the opportunity to attend one of these specific programs. Because of this, we urge the passage of House Bill 2305 to permit as "polysomnography education" for the purposes of Oregon licensure any of the combined education and training pathways that are required by the Board of Registered Polysomnographic Technologists before an applicant may take the examination for the Registered Polysomnographic Technologist credential, the international gold-standard credential in the field. Currently this encompasses three of the Board of Registered Polysomnographic Technologists' six pathways:

- RPSGT Pathway 1: Clinical Experience, for candidates with a minimum of 1638 hours of experience in the field and who have also completed a STAR [Sleep Technology Approved Resource]-designated Self-Study education program;
- RPSGT Pathway 3: CAAHEP/CoARC Student, for graduates of a CAAHEP [Commission on Accreditation of Allied Health Education Programs] or CoARC [Commission on Accreditation for Respiratory Care]-accredited polysomnography education program; and
- RPSGT Pathway 4: Focused Training, for candidates with a minimum of 819 hours of experience in the field and who have also completed STAR-designated Focused education, or a combination of Self-Study and Focused 2 education.

Aligning Oregon's education and training requirements with those of the profession's gold-standard certifying body ensures that Oregon state law is in accordance with national standards while avoiding unnecessarily denying access to the State to highly skilled, educated professionals whose experience in the polysomnography field predates the existence of polysomnography Associate's degree and CAAHEP-accredited programs.

Additionally, current Oregon polysomnography licensure Pathway One specifies that applicants must pass the exam for the Registered Polysomnographic Technologist credential within the two years preceding the date of application for Oregon licensure. This means that Polysomnographic Technologists applying for licensure in Oregon through one of these pathways must either have earned their credential in the past two years, or they must retake the credentialing exam for a credential they already hold solely for the purpose of Oregon licensure. The Board of Registered Polysomnographic Technologists does not typically permit Technologists with an up-to-date credential to retake the exam, and a special exception has had to be made specifically for those seeking licensure in Oregon. The two-year timeframe requirement for passage of this exam is costly, unnecessary, and unfairly burdensome to experienced technologists. It is also illogical to request that the profession's credentialing body make an exception to its standards solely for Oregon.

We have raised our concerns to the members of the Oregon Respiratory Therapist and Polysomnographic Technologist Licensing Board twice in the last two years. First in response to rulemaking initiated by the Oregon Health Licensing Office staff and the second time through petitioning the board for a rule change.

We strongly support the passage of House Bill 2305 to allow Sleep Centers throughout Oregon to hire experienced and educated Polysomnographic Technologists.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Janise White", with a long horizontal flourish extending to the right.

Janise White, B.S. RRT
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