



AMERICAN ASSOCIATION FOR RESPIRATORY CARE
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May 18, 2021

Ms. Kelly M. Cruz
Director, Employment and Compensation Line of Business
Defense Civilian Personnel Advisory Service (DCPAS)
Defense Human Resources Activity
Department of Defense
Washington, DC 20301

Dear Ms. Cruz:

The American Association for Respiratory Care is the national professional organization with a membership of over 40,000 respiratory therapists (RT) and whose organizational activities impact over 190,000 practicing respiratory therapists across the country. Respiratory therapists are nationally credentialed medical professionals who specialize in providing pulmonary diagnostics and care and are experts in treating patients who suffer from respiratory conditions like Chronic Obstructive Pulmonary Disease (COPD), asthma, pneumonia, lung trauma and other respiratory-related diagnoses such as COVID-19.

As President of the AACRC, I am writing to make you aware of changes in the RT qualification standards implemented in March 2021 by the Veterans Administration as we believe the changes could impact civilian employment of RTs in the military as pointed out by one of our members who is a registered respiratory therapist (RRT) working in a naval hospital in Florida where the RT position is capped at a GS7. The revised VA standards require all new RT employees to be licensed and to hold the RRT credential as entry level for permanent employment, the latter of which is a goal of the AACRC. Significant changes in pay grades have "raised the bar" from a GS08 to a GS11 level for full performance which is far below the top of the grade level highlighted by our member. He raised concerns that without changes in the DOD, managers could see an exodus of civilian RTs to the VA where recognition of the RTs' value is more appropriately recognized and compensated. A copy of the qualification standards for certified and registered respiratory therapists are attached for your convenience.

The practice of respiratory therapy has evolved from the days of oxygen therapy, arterial blood gas interpretation, and nebulizer therapy. Current practice requires respiratory therapists to

have extensive assessment abilities and practice competencies to initiate and provide cardiopulmonary interventions for their patients across a broad scope of practice and in a variety of patient care venues. Respiratory therapists are also the essential health care providers when it comes to management of individuals who have been mechanically ventilated, and their role has been critical in monitoring and assessing the patient's respiratory needs and response to therapy during the pandemic.

We hope that as part of your role in overseeing policies related to defense civilian personnel and compensation, you will review the VA RT standards and consider changes to your employment qualifications that fully recognize the value and expertise of respiratory therapists in treating and managing patients with cardiopulmonary disease. Ultimately, the goal of the respiratory therapy educational system and state licensure process is to prepare competent respiratory therapists to provide safe and effective patient care in an increasingly complex health care environment. Changes to your policies can go a long way to meeting that goal.

Thank you in advance for considering this request.

Sincerely,

A handwritten signature in cursive script that reads "Sheri Tooley".

Sheri Tooley BSRT, RRT, RRT-NPS, AE-C, CPFT, FAARC
President and CEO 2021-2022

Attachments