

July 27th 2021

Nebraska Department of Health and Human Services
Attn: Ron Briel
PO BOX 95026
Lincoln, NE 68509-5026



Dear Mr. Briel,

Please accept this letter to serve as the Nebraska Society of Respiratory Care (NSRC) Letter of Intent to pursue a credentialing review of the Nebraska statutes relating to the scope of practice of Respiratory Care Practitioners (RCPs).

Extracorporeal Membrane Oxygenation (ECMO), is a modified cardiopulmonary bypass technique used to treat life threatening cardiac or respiratory failure. Respiratory therapists across the nation have the ability to be trained and certified to administer, manage and monitor this critically important life support system due to their unique and current skillset in working with the cardiopulmonary system. The extensive training makes therapists uniquely qualified to manage the ECMO system, by specifically overseeing the administration of blood, blood by-products and medication delivery intravenously. As a provider, to some of most critical ill patients in the state of Nebraska and region, we as respiratory care practitioners, are responsible for management and maintain of some most technology and advance equipment used on these patients.

While the statute clearly brings administration of complex cardiopulmonary therapeutic modalities and procedures within the scope of an RCP's licensure, the current statute addressing scope of practice for a respiratory care practitioner Neb. Rev. Stat §38-3205, does not squarely address medication administration. Recently, feedback from the Nebraska Department of Health and Human Services (DHHS), make it unclear if Nebraska's licensure for RCP's would consider administration of medication during these complex cardiopulmonary therapies to be within the scope for RCPs even when they have obtained certification as Extracorporeal Membrane Oxygenation (ECMO) Specialists.

With this information provided, the NSRC is proposing the following changes:

- **Update the definition of respiratory care in section 38-3205** to better clarify the role of a respiratory care practitioner as it relates to the administration of pharmacological agents related to respiratory therapy procedures.

A copy of this letter via U.S. Mail along with our \$500 application fee. We will submit our official once we receive confirmation that our application is eligible for review.

Thank you for your assistance with this process. If you have any questions, please do not hesitate to contact me.

Sincerely,

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