



# COMMONWEALTH of VIRGINIA

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Daniel D. Rowley, BS, RRT-NPS, RPFT  
President, Virginia Society for Respiratory Care  
Surgical/Trauma/Burn ICU, Box 801443  
University of Virginia Medical Center  
Charlottesville, VA 22908

Dear Mr. Rowley:

Below follows the text of a letter that was sent to the respiratory therapy programs in the Commonwealth of Virginia.

*Dear Respiratory Therapy Program Director:*

*This letter is being written to revisit certain aspects of the law that provides the student exception to licensure for the practice of respiratory care. It is intended to be helpful to training programs, faculty, hospitals, respiratory care practitioners and respiratory care students.*

*The Board presumes programs that teach respiratory care seek the best possible experiences for their students during training to ensure they will be well-prepared for the practice of respiratory care. Concerns have been raised in the past about the role of students, their work and their supervision while still in training programs. The concept of a mentorship, conceived to be part and parcel of the student's program of study, has been forwarded. This letter reviews the concept of a mentorship and suggests the strongest stances that a program can take to ensure that students participating in these experiences are compliant with the law.*

*Mentorships are understood to be valuable student experiences wherein new skills are not taught or learned, but rather are experiences that serve to hone the skills in which the student has demonstrated proficiency. A mentorship is similar to summer courses in which no new skills are taught. They may be in noncritical care or critical care. The goal is to increase the speed, confidence and competence of the student. Students that elect to do mentorships typically are approved and recommended by the program to participate in a mentorship experience. Students' competencies are typically checked by the school, and again by the facility/mentor in which the mentorship will be performed. The mentor provides a report back to*

*the program regarding the student's performance in the mentorship. This information is used by the program to evaluate the student's progress in his/her curriculum of study.*

*Section 54.1-2956:01 of the Code of Virginia provides the framework by which a student qualifies for the exception to the requirement for a license to practice respiratory care. It has essentially five important links that appear to hold the framework together to lawfully permit a student to practice respiratory care.*

*The first link is "integral part of a program of study." In the event that a school establishes a mentorship program, it must be part of a student's program of study. Ideally, it should pass muster with the appropriate reviewing body as coursework, be assigned a course number and appear in the course catalog along with a description. This would be the strongest position that a program/hospital/student could have in this matter.*

*The second link in the law is "by students enrolled in an accredited respiratory care education program." All respiratory care students in a program that elect to participate in a mentorship program meet this requirement.*

*The third link is the requirement that the student be identified as a "Student RCP." All students that elect to enroll in a mentorship program must wear name tags identifying them as Student RCP's.*

*The fourth link is the issue of "direct supervision." Any student involved in a mentorship must be directly supervised by a fully licensed respiratory care practitioner during the time he/she is providing care.*

*Which brings us to the fifth link, that of the "appropriate clinical instructor." It would appear that this anticipates the individual providing the "direct supervision" in the above paragraph would have a designated faculty status with the college.*

*Attention to all these points of the law is necessary to show full compliance. Making sure the framework of a mentorship is strong is a benefit to the student, the program and the public.*

*With kindest regards,*

I hope this is of help to you, and thank you for your interest in the Board and the regulation of your profession.

Kindest regards,



William L. Harp, MD  
Executive Director  
Virginia Board of Medicine