



NORTH CAROLINA RESPIRATORY CARE BOARD
125 Edinburgh South Drive, Suite 100
Cary, NC 27511

November 10, 2016

Brittany Komansky, MHA, BSN, RN, CEN
Manager, Emergency Services
Apex Healthplex, Wake Med
120 Healthplex Way
Apex, NC 27502

Dear Ms. Komansky,

This letter is sent on behalf of the North Carolina Respiratory Care Board in response to your email of April 15, 2016, requesting an interpretation of the Respiratory Care Practice Act (“*RCPA*”) and the Board’s Rules in relation to the performance of splinting at WakeMed Healthplex facilities by respiratory care practitioners (RCPs) who are licensed by the Board. The Board is the North Carolina agency that has statutory responsibility for regulating the practice of respiratory care, and the licensees are subject to the *RCPA* and the Board’s Rules while performing any duties at WakeMed Healthplex facilities.

The Board discussed your request at the October 13, 2016 Board Meeting, and reviewed the information you furnished in your email and at recent meetings of the Board’s Practice Committee. The Board determined that splinting is **not within** the scope of practice of respiratory care since it is not customarily taught as part of Respiratory Therapy education. However, given the parameters of the WakeMed Healthplex operations, and the information you have presented about splinting at WakeMed Healthplex facilities, and after considering a study by the Virginia Board of Health Professions, it is clear that the entry-level splinting skills described in the information you submitted to us require a minimum of a high school education and one year full-time work experience in either a hospital, clinic or office setting, working directly in the treatment of the orthopedic patient(s). For this reason, the Board has determined that an RCP who performs these tasks under the order of a licensed physician does not engage in hazardous health care practices in violation of G.S. 90-659 (1) (d), so long as:

- 1) *The RCP has documented training and annual documented competency for the procedures approved by the institution, including at least one year of full-time work experience; and*
- 2) *The facility or program where these procedures are performed maintains policies and guidelines for the performance of these procedures, as it would for any procedures provided by the respiratory care practitioners that it employs.*

Please advise if you have any other questions about this issue.

Regards,

William L. Croft, Ph.D., RRT, RCP
Executive Director