

Testimony of  
The **Connecticut Society of Radiologic Technologists (CSRT)**  
submitted to the  
Public Health Committee on  
Friday, March 16, 2018

Re: Raised Bill No. 300, An Act Concerning Collaborative Arrangements Between Physician Assistants and Physicians.

The Connecticut Society of Radiologic Technologists (CSRT) appreciates this opportunity to submit testimony concerning Raised Bill No. 300, An Act Concerning Collaborative Arrangements Between Physician Assistants and Physicians.

CSRT opposes the bill as written.

The CSRT is the state affiliate of the American Society of Radiologic Technologists (ASRT). We represent the more than 4,000 Radiologic Science professionals in the state of Connecticut.

1. The first concern of the CSRT is that a Scope of Practice Determination was not conducted in compliance with the Connecticut General Statutes 19A-16F-Report to General Assembly on Scope of Practice Review Processes. The goal of this process is to:
  - a. Create a more formal, standardized, and concise process for information gathering.
  - b. Create a process whereby knowledgeable, objective professionals in the relevant area of health care review and assess the information prior to any action by the public health committee.
  - c. Allow a body of professionals to make recommendations to the Public Health Committee based on formal evaluation of pertinent information and discussions with stakeholders.

This proposed change in the physician assistant (PA) scope of practice could have unintended and significantly negative consequences. It is the opinion of the CSRT that a Scope of Practice Determination should be done before this bill proceeds any further in the review process.

2. The second concern of the CSRT is the vague wording of Sec. 3. Section 20-12a (3) (B) *methods by which the physician and physician assistant will review medical therapeutics, corrective measures, laboratory tests and other diagnostic procedures that the physician assistant may prescribe, dispense and administer*. Specifically, the words *dispense* and *administer* are the most concerning for the CSRT. The physician assistant (PA) may prescribe radiology procedures, to which the CSRT does not object. Our concern is that the performance of radiologic procedures including general X-rays and computed tomography (CT) procedures are not part of their scope of practice. These common medical imaging exams are often referred to as diagnostic procedures. Perhaps the intent of this wording is to include only those diagnostic tests and procedures that do not involving ionizing

radiation. However, the CSRT is concerned that this vague wording might be misconstrued to include diagnostic procedures that involve the use of ionizing radiation.

The American College of Radiology (ACR) Practice Parameter for General Radiography (Res. 30-2013) states that only Radiologic Technologists who have attained “Certification by the American Registry of Radiologic Technologists (ARRT)...” may perform radiography procedures. Physician assistants are not included as professionals who may perform such procedures.

Section VII. of ACR Practice Parameter 30-13 titled, *Radiation Safety in Imaging* states that, “Radiologists, medical physicists, registered radiologist assistants, radiologic technologists, and all supervising physicians have a responsibility for safety in the workplace by keeping radiation exposure to staff, and to society as a whole, “as low as reasonably achievable” (ALARA) and to assure that radiation doses to individual patients are appropriate, taking into account the possible risk from radiation exposure and the diagnostic image quality necessary to achieve the clinical objective. All personnel that work with ionizing radiation must understand the key principles of occupational and public radiation protection (justification, optimization of protection and application of dose limits) and the principles of proper management of radiation dose to patients (justification, optimization and the use of dose reference levels).” Physician Assistants are not included in the ACR Practice Parameter due to their distinct and substantial differences in the level of education in radiology procedures they receive.

***It is the strong opinion of the CSRT that only qualified, educationally-prepared and clinically competent Radiologic Technologists should dispense ionizing radiation while administering radiographic procedures.***

Physician Assistants may use fluoroscopy as described in *Sec. 20-12i. Use of fluoroscopy by physician assistants. Qualifications and examination. Certain activities not prohibited.* This chapter should stay intact and should not be removed or changed.

On behalf of the Connecticut Society of Radiologic Technologists (CSRT), thank you for the opportunity to submit this testimony.

Sincerely,

Daniel N. DeMaio, M.Ed., RT(R)(CT)(ARRT)  
Board Chair, 2017-18  
Connecticut Society of Radiologic Technologists (CSRT)