



**The Pennsylvania Radiological Society**  
**214 State Street, Harrisburg, PA 17101**  
**717-695-4751**

Subject: Support for House Bill 1545

January 16, 2018

Dear Representative Mustio,

The Pennsylvania Radiological Society (PRS), a chapter of the American College of Radiology (ACR), is an organization of over 1600 members representing radiologists, radiation oncologists, and radiation physicists from across the commonwealth. Our mission includes the advancement of the science of radiology, improvement in radiology services to patients and the medical community, and the establishment of high medical and ethical standards in the practice of radiology.

As a corollary to our mission, we are writing to you to support consideration of House Bill 1545 for a hearing by the House Committee on Professional Licensure. House Bill 1545 provides for medical imaging and radiation therapy licensure and establishes a Medical imaging and Radiation Therapy Board of Examiners which would license and establish qualifications for individuals in Pennsylvania who perform medical imaging or radiation therapy procedures on humans for diagnostic or therapeutic purposes.

The PRS (and parent organization ACR) have long supported patient protection from excessive and improper use of radiation in medicine. Past ACR Council actions reflect the following: "The American College of Radiology supports licensure, certification, or other appropriate methods designed to assure the qualifications of all persons operating equipment emitting ionizing radiation." (adopted 1986,1996,2006, 2016).

Currently in Pennsylvania a uniform standard does not exist to assure patients that individuals operating medical imaging or radiation therapy equipment and performing medical imaging or radiation therapy procedures have the appropriate education, training, and certification to protect them from the harmful effects of excessive and improperly performed medical imaging or radiation therapy procedures.

Current Joint Commission (JACHO, national hospital accrediting organization) standards specify training and certification standards for medical physicists who support diagnostic radiology and radiation oncology equipment and continuing education guidelines for technologists who operate diagnostic radiology and radiation oncology equipment, but do not specify specific education, training, and certification for all individuals operating medical imaging or radiation therapy equipment and performing medical imaging or radiation therapy

procedures. It is currently the responsibility of individual states to set and enforce requirements for these individuals.

A Joint Commission Sentinel Event Alert published August 2011 reviews the radiation risks of diagnostic imaging including cancer risk, burns, hair loss, and other injuries. Patients most prone to harm from diagnostic radiation include children and young adults, pregnant women, individuals with medical conditions sensitive to radiation including diabetes mellitus and hyperthyroidism, and individuals receiving multiple doses over time. In this document, JACHO recommends that an organization develop a process to “ensure physicians and technologists who prescribe diagnostic radiation or use diagnostic radiation equipment receive dosing education and are trained on the specific model of equipment being used; and institute a process for annual education, review, and competency testing.” A consistent mechanism for this to occur in Pennsylvania does not currently exist. Licensure of personnel involved in medical imaging or radiation therapy procedures addresses this issue.

The ACR Technical Standard for Management or the Use of Radiation in Fluoroscopic Procedures (developed 2002, latest revision 2013) sets qualifications and responsibilities for personnel performing or supervising fluoroscopically guided procedures including physician or physician designee, qualified medical physicist, radiologic technologist, radiation therapist, and other ancillary personnel using fluoroscopy. Pennsylvania currently does not have a uniform mechanism to ensure that these qualifications and responsibilities are met.

In support of the recommendations above by JACHO, ACR, and other national organizations involved in radiation safety including the FDA, PRS supports House Bill 1545 and the establishment of a Medical Imaging and Radiation Therapy Licensing Board to establish uniform competency standards in medical imaging and radiation therapy equipment use and safety by involved practitioners.

Sincerely,

A handwritten signature in cursive script that reads "Keith Haidet MD FACR".

Keith R. Haidet, M.D, FACR

President, Pennsylvania Radiological Society

Attachments (6)