PAs and Fluoroscopy

Physician assistants (PAs) have been performing diagnostic and interventional procedures that use ionizing radiation since the early days of the profession. A PA’s ability to perform these procedures has been derived from state PA practice laws that permit physicians to delegate the ability to order and perform diagnostic tests and therapeutic procedures, presumably including procedures that use ionizing radiation, to PAs. State governments have an obligation to protect those within their borders from the potentially harmful effects of radiation. Laws governing the use of ionizing radiation are designed to ensure that anyone who performs a procedure using ionizing radiation has the necessary training to assure the safety of the patient, the person performing the procedure, and anyone else in the room.

As the radiology health care workforce has advanced, the use of ionizing radiation by PAs has come under scrutiny in some states. In states that regulate the use of ionizing radiation, the laws governing PA practice and those governing ionizing radiation may contradict one another. Most state medical imaging laws permit only licensed radiologic technologists (RTs) to take x-rays or perform other procedures utilizing ionizing radiation, such as fluoroscopy. However, state PA scope of practice provisions authorize PAs to perform these tasks as authorized by the physician. This can create a conflict between state PA practice laws and provisions that regulate medical imaging.

Licensing Laws & Exemptions

RT licensing laws commonly provide an exemption for other practitioners whose scope of practice may lawfully include the use of radiologic technology. An exemption allows the practitioner to perform procedures that require an RT license without being required to obtain an RT license in addition to their other state license. State RT laws vary in how they address exemptions from RT licensure requirements to perform radiological procedures and may include PAs in those definitions. Other states include a section listing professionals who are exempt from the provisions of the RT practice laws. These lists typically include physicians, dentists, podiatrists, chiropractors and veterinarians, as well as those licensed as x-ray operators, nuclear medicine technologists, radiographers, CT technologists and radiologist assistants. Although some states have been hesitant to give PAs a full exemption from RT licensing requirements, many states have been receptive to exempting the use of fluoroscopy for PAs with additional training.

The first laws authorizing the practice of radiologic technology were predominantly adopted in the 1970s and 1980s, when many states did not yet legally recognize PAs. Therefore, unless “physician assistant” or “PA” is specified within the exemption, one should not assume that RT laws or rules include PAs in the group of professions that are exempted from the requirement for RT licensure in order to perform procedures involving ionizing radiation.

Development of the Fluoroscopy Educational Framework for PAs

To address the barriers faced by PAs whose practice requires the use of fluoroscopy, AAPA contacted the American Society of Radiologic Technologists (ASRT) to discuss creation of a solution that could be applied in multiple states. ASRT actively pursues enactment of laws and regulations in states to authorize practice and license RTs. AAPA supported including PAs as an “exempt” provider as AAPA policy calls for PAs to be allowed to perform any legal procedure for which they have appropriate training and experience. However, ASRT would not agree to support a PA exemption without an accompanying educational requirement. Following negotiations, AAPA, along
with PAs in Radiology and ASRT agreed to the joint development of an educational program for PAs who use fluoroscopic guidance in their practice.

In 2009, AAPA and ASRT collaborated to create the *AAPA/ASRT Fluoroscopy Educational Framework for the Physician Assistant*, an educational program that instructs PAs in areas of radiation safety, radiation biology, function of fluoroscopic equipment, and regulations regarding radiation exposure limits. The educational framework is divided into two sections, 40 hours of didactic instruction and 40 clinical hours. The online didactic section covers patient history, contrast media, operation of the fluoroscopic unit and radiation safety. The second section is a clinical component. The program is designed for working professionals. The educational program is recognized by the American Registry of Radiologic Technologists (ARRT) and participants that complete this program are allowed to take the ARRT Fluoroscopy Examination when required by the state.

**The Agreement Between AAPA and ASRT**

The Fluoroscopy Educational Framework was developed as a consensus between AAPA and ASRT. As such, ASRT has agreed not to oppose legislation or regulations authorizing PAs to use fluoroscopy that include the agreed upon components. The agreed upon components include: 1.) Requiring PAs wishing to use fluoroscopy to complete 40 hours of didactic and 40 clinical hours and 2.) Passage of the ARRT exam. The agreement does not propose a continuing medical education requirement.

As the national organization for RTs, ASRT has agreed to these terms. However, ASRT’s affiliate state chapters are not uniformly bound by the terms of the agreement. PAs seeking to use fluoroscopy in a state are encouraged to contact the state RT society to address any potential concerns.

**SAMPLE LANGUAGE FOR STATUTE OR REGULATION**

Sample 1: A PA performing fluoroscopy or advanced radiologic procedures must have completed the Fluoroscopy Educational Framework for the Physician Assistant created through the collaboration of the American Academy of PAs and the American Society of Radiologic Technologists.

Sample 2: Prior to engaging in the use of fluoroscopy for guidance of diagnostic and therapeutic procedures, a PA shall successfully complete a course that includes forty hours of training on topics that include, but are not limited to, radiation physics, radiation biology, radiation safety and radiation management applicable to fluoroscopy and 40 hours of supervised clinical practice.

**Conclusion**

PAs routinely perform procedures that require fluoroscopic guidance and should be authorized to utilize all technology for which they are appropriately trained to provide patient care. Some physicians believe PA practice laws already give them the ability to authorize PAs to use fluoroscopy. However, it is important to check RT practice laws and regulations as well to make sure they do not prohibit PAs, either explicitly or by omission, from performing procedures that use ionizing radiation.

AAPA and ASRT developed the Fluoroscopy Educational Framework for PAs who need to utilize fluoroscopy in clinical practice as a conveniently accessible educational program in radiation protection and radiation safety. ASRT has agreed not to oppose legislative or regulatory measures that authorize PAs to use fluoroscopy as long as it requires the completion of 40 didactic and clinical hours and passage of the ARRT exam. For more information on the AAPA/ASRT course visit [www.aapa.org/fluoroscopy](http://www.aapa.org/fluoroscopy).

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1. *AM. ACAD. OF PHYSICIAN ASSISTANTS, 2015-2016 POLICY MANUAL*, 53 (2015);