

Subject: **Advanced Practice Nurses Encroach on Radiology**

The Massachusetts Society of Radiologic Technologists Board of Directors would like to share critical information affecting the medical imaging and radiation therapy professions in Massachusetts. The mission of the MSRT includes advocating for safe and appropriate use of radiation used in imaging and therapy, and influencing health policy in the best interest of the citizens of the Commonwealth. A number of bills that will allow Advanced Practice Registered Nurses (APRN) to “administer,” “perform” or “interpret” medical imaging “tests” are currently under consideration in the Massachusetts Legislature and may affect patient care.

Massachusetts House Bill 1889 has been referred to the committee on House Ways and Means and will add to the nurse practitioner scope of practice: “Performance of advanced assessment and diagnoses, issuance of written prescriptions, the selection, ordering and *administration of tests* and therapeutics;”

MSRT is closely watching these bills that are currently under consideration to monitor for any amendments that may be made to allow advanced registered nurse practitioners to perform medical imaging.

- **House Bill 1996** that is currently drafted to read: “The board shall promulgate advanced practice nursing regulations which govern the provision of advanced practice nursing services and related care including, but not limited to, the ordering and interpreting of tests, the ordering and evaluation of treatment and therapeutics and any registration as a practitioner, under chapter 94C.”
- **Senate bill 1163** which currently reads: “Advanced practice nursing regulations which govern the provision of advanced practice nursing services and related care, including but not limited to the ordering and interpreting of tests and the ordering of treatment and therapeutics and any registration as a practitioner under chapter 94C, shall be promulgated by the board.”
- **Senate Bill 1207** which currently reads: “The board shall promulgate advanced practice nursing regulations which govern the provision of advanced practice nursing services and related care including, but not limited to, the ordering and interpreting of tests, the ordering and evaluation of treatment and therapeutics and any registration as a practitioner, under chapter 94C.”

In March 2016, the Massachusetts Board of Registration in Nursing issued [Advisory Ruling 0201](#) regarding nurse practitioners as first assistants in cardiac catheterization. The advisory ruling states: “CNPs who perform as First Assistants at cardiac catheterization may operate fluoroscopic systems when required for the production and display of serial x-ray images for the purpose of observing real-time motion of anatomical structures. CNPs may operate fluoroscopic systems in the capacity as first assistant in cardiac catheterization procedures. In addition, CNPs may operate fluoroscopic systems in clinical areas beyond the cardiac catheterization laboratory in order to produce and display serial x-ray images for the purpose of observing real-time motion of anatomical structures in order to safely perform diagnostic or therapeutic interventional procedures. Employer policies and procedures direct the education and training requirements of the CNP who operate fluoroscopic systems.”

The MSRT brought this ruling to the attention of the Massachusetts Department of Public Health Radiation Control Program and an official inquiry has been launched to determine if the nursing board ruling is in conflict with the regulations for radiologic technologist licensure.

The MSRT is strongly opposed to HB 1889, and we hope that you, as medical imaging and radiation therapy professionals, are equally opposed. Upon investigation no educational content in the APRN doctor of nursing practice or master's degree curricula covering radiation physics, radiobiology, radiation safety and radiation management has been identified. It would not be in the best interest of Massachusetts patients to allow the performance of imaging or therapeutic procedures by those who have no formalized education in such procedures.

We are now in the final few weeks of the legislative session. Please help us work to protect the integrity of our profession and the health of the citizens of the Commonwealth by contacting your state representatives and senators urging them to oppose any bills that would expand the APRN scope of practice to allow the "performance" or "administration" of any imaging "test" by anyone who cannot document formalized educational preparation or clinical competency assessment.

In your communication, please let lawmakers know that you oppose the expansion of the scope of practice for advanced practice registered nurses to include "performance" or "administration" of medical imaging "tests" or "examinations" without evidence of:

- Completion of specialized education in the management of ionizing radiation;
- Radiologic technologist or radiologist-supervised clinical training in medical imaging procedures; and
- Quantifiable competency assessment through examination.

Only registered and licensed radiologic technologists should perform procedures that use ionizing radiation and only experienced radiologists should interpret medical images. Registered radiologic technologists have the education, experience and skills required to perform highly technical procedures like conventional radiography and fluoroscopy, computed tomography, magnetic resonance imaging, nuclear medicine, vascular-interventional radiography or bone densitometry safely and effectively for Massachusetts patients.

You can find your state representative's and senator's name, phone number and email address at www.malegislature.gov. These unfolding events are evidence for the need for strong advocacy for our profession in Massachusetts. The MSRT would like to encourage you to join with us and take action today so that we can be a strong voice for our profession.

Thank you,
Massachusetts Society of Radiologic Technologists Board of Directors