



## MASSACHUSETTS RADIOLOGICAL SOCIETY, INC.

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To the Honorable Chairs and Members  
Joint Legislative Committee on Public Health

Re: H.2178 "An Act Pertaining to Physicians Delegating to Physician Assistants Procedures Using Ionizing Radiation"

My name is Alan Semine, M.D., and I am a radiologist and the Chief of Breast Imaging at Newton Wellesley Hospital and Medical Director of the Manton Breast Imaging Center and of the Auerbach Breast Center. I am president of the Massachusetts Radiological Society (MRS) which represents over 800 radiologists and radiation oncologists practicing in the Commonwealth. The MRS is opposed to H.2178.

The regulations of the Board of Registration of Physician Assistants ("PA Board") and the Board of Registration in Medicine ("Medicine Board") prohibit physician assistants from performing any procedure involving ionizing radiation or render a formal medical opinion on procedures involving ionizing radiation. The regulations were adopted in recognition that physician assistants do not receive formal training in performing ionizing radiation procedures, and the inherent danger of radiation exposure to patients and providers in allowing untrained individuals to engage in procedures involving radiation.

Physician assistants have become involved in interventional medical services with a supervising physician such as arthrograms, angiograms and placement of catheters in which fluoroscopy is used to assist in the procedures. Modern fluoroscopy equipment is capable of delivering very high radiation doses during prolonged procedures. There are reports in medical literature of serious skin injuries in some patients undergoing certain fluoroscopically guided procedures. In addition, exposure to ionizing radiation is cumulative over one's lifetime and is an important risk factor in development of cancer for both the patient and the provider. It is vitally important that exposure to ionizing radiation always be kept to the absolute minimum and only well trained individuals operate fluoroscopy equipment.

H.2178 would allow PAs to perform radiological procedures, including fluoroscopy, if they complete a radiation safety course. This bill is overly broad and limits the authority of the PA Board and the Medicine Board in protecting the public through regulating what a physician can delegate to a PA, and what a PA can do, as it relates to radiological procedures.

The PA Board and the Medicine Board currently have authority to regulate the performance of radiological procedures by physician assistants. The PA Board has convened a working group which consists of the Medicine Board, the Radiation Control Division of the Department of Public Health along with physician assistants and physicians, including MRS, to look at the issue of allowing PAs to use fluoroscopy equipment during interventional procedures. This process should be allowed to continue and the decision as to whether, and to what extent, a physician assistant is allowed to use fluoroscopy, and what training and qualifications may be required, should be left to the current regulatory process, because they are in a better position to develop an informed policy on fluoroscopy based on standards deemed to provide safe, appropriate and quality care to patients.

Unfortunately, H.2178 would interfere with that process by imposing an expansion of the scope of practice of physician assistants that ties the hands of the PA Board and the Medicine Board from effectively regulating the ability of physician assistants to perform procedures involving ionizing radiation.

The MRS would urge the committee to reject H.2178 and let the Board of Registration of Physician Assistants along with the Board of Registration in Medicine and the Division of Radiation Safety of the Department of Public Health continue its process of developing a policy regarding the use of fluoroscopy by PA's that meets standards of care and ensures patient safety. MRS in turn is prepared to support that process to make sure that the issue of PA's ability to participate in fluoroscopic procedures under capable physician supervision be addressed and resolved.

Respectfully submitted,

Alan Semine, M.D.  
President