



## Board of Medical Imaging and Radiation Therapy

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### ADVISORY OPINION STATEMENT

#### **Medical Imaging Technologists Performing Fluoroscopy During Swallowing Studies**

September 20, 2016

#### Position Statement:

The Kentucky Board of Medical Imaging and Radiation Therapy is authorized by Kentucky Revised Statutes (KRS) Chapter 311B to regulate advanced imaging professionals, medical imaging technologists, radiation therapist, and nuclear medicine technologists. The Board has received an inquiry regarding whether a medical imaging technologist may operate fluoroscopy equipment while a speech therapist performs a swallowing study with indirect supervision of a radiologist. This operation would constitute a violation of a medical imaging technologist's practice standards.

#### Topic Discussion:

A radiographer may perform "noninterpretive fluoroscopic procedures as prescribed by a licensed independent practitioner." See 201 KAR 46:040, Section 11(1) and Section 15(a). A "licensed practitioner" or "licensed practitioner of the healing arts" means a person licensed to practice medicine, osteopathy, dentistry, chiropractic, podiatry, or veterinary medicine. KRS 311B.020(8). Because a swallowing study is a diagnostic procedure, the utilization of fluoroscopy by a medical imaging technologist is a violation of the American Society of Radiologic Technologists (ASRT), "Radiography Practice Standards", revised June 16, 2013 incorporated by reference into the Kentucky Administrative Regulations, 201 KAR 46:040, Section 11 (1) and Section 15, (a).

An Advanced Imaging Professional, credentialed by the American Registry of Radiologic Technologists (ARRT) as a Registered Radiologist Assistant (R.R.A.) may independently perform fluoroscopy during this procedure, consistent with their scope of practice, and the "Radiologist Assistant Practice Standards", revised July 29, 2014 incorporated by reference by 201 KAR 46:040, Section 11 (11) and Section 15(k).

#### Board Authority:

The Board of Medical Imaging and Radiation Therapy is authorized by KRS 311B.010 to 311B.190 to regulate an operator of a source of radiation other than a licensed practitioner of the healing arts. The Board of Medical Imaging and Radiation Therapy utilizes Kentucky Administrative Regulations 201 KAR 46:010 to 201 KAR 40:090.

Applicable Statutes and Regulations:

*311B.010 Legislative policy and intent.*

- (1) It is the declared policy of the General Assembly of Kentucky that the practice of medical imaging, radiation therapy, and related occupations should be regulated and controlled as provided by this chapter and by the administrative regulations of the board in order to protect and safeguard the health and safety of the citizens of the Commonwealth of Kentucky.*

*201 KAR 46:040, Section 11. Practice Standards.*

*Individuals licensed pursuant to this administrative regulation shall perform according to practice standards of the discipline for which they hold credentials, as established by the American Society of Radiologic Technologists (ASRT), the American College of Radiology (ACR), the American Association of Physicists in Medicine (AAPM), and the Society of Nuclear Medicine and Molecular Imaging (SNMMI) and incorporated by reference. These standards include the:*

- (1) Radiography Practice Standards;*

*201 KAR 46:040, Incorporation by Reference.*

- (1) The following material is incorporated by reference:
  - (a) "Radiography Practice Standards", revised June 16, 2013;**