



1119 Lindenhurst Street
Philadelphia, PA 19116-1313
SRPEweb.org

Director, Regulations Management (02REG),
Department of Veterans Affairs,
810 Vermont Avenue NW. Room 1068,
Washington, DC 20420

In response to RIN 2900-AP44-Advanced Practice Registered Nurses.

Dear Director,

The U.S. Department of Veterans Affairs (VA) has introduced a proposal that would allow nurses to, "Order, perform, supervise, and interpret laboratory and imaging studies." The Society of Radiology Physician Extenders (SRPE) **strongly opposes** this measure as only registered radiologic technologists and Radiologist Assistants (RAs) should perform procedures that use ionizing radiation. Furthermore, only radiologists should provide interpretations of medical images to ensure appropriate diagnosis.

Although certified nurse practitioners (NPs) are highly trained healthcare professionals in the area of general medicine, they lack the education, experience, and/or skills required to perform highly technical procedures like fluoroscopy, x-ray, computed tomography, nuclear medicine, vascular-interventional, and/or bone densitometry.

The Radiologist Assistant (RA) is uniquely qualified radiologist physician extender. The RA is a registered radiologic technologist who has completed advanced didactic and clinical education in the specialized area of medical imaging. RAs work under the supervision of a radiologist and have specific education and training in radiation safety, radiobiology, positioning, fluoroscopic operation, imaging appropriateness, radiologic procedures, and radiopharmaceuticals. Enclosed are two articles published in peer reviewed journals regarding the education and training of NPs and RAs in medical imaging.

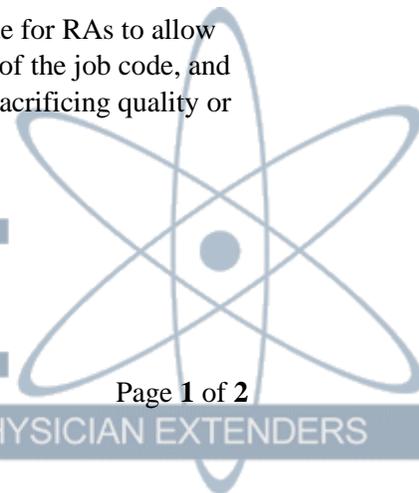
The SRPE supports the concept to expand the pool of qualified healthcare professionals but not at the cost of quality of care. The SRPE encourages the use of the most appropriate physician extender to provide care to our nation's veterans by performing tasks to the extent of their education and training. In medical imaging, the RA is the only physician extender with specific education and training to provide safe, effective care to veterans under the supervision of a radiologist. After repeated requests to the administration of the VA for the creation of the job code to allow RAs to work in the VA health system, the VA has not created a job code or recognize the RA thus limiting access to care.

The SRPE encourages the U.S. Department of Veterans Affairs to establish a job code for RAs to allow RAs to work under the supervision of a radiologist in medical imaging. The creation of the job code, and recognition of the RA, will increase efficiency of medical imaging services without sacrificing quality or safety.

If you have any questions, please contact me,

Sincerely,

SRPE





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