

January 26, 2018

The Honorable Maida Townsend
Vermont House of Representatives
Vermont State House
115 State Street
Montpelier, VT 05633

Via email: mtownsend@leg.state.vt.us

Re: House Bill 684

Dear Representative Townsend:

The American Society of Radiologic Technologists (ASRT) is the national professional organization that represents more than 154,000 medical imaging and radiation therapy technologists who provide imaging care to our country's patients, including nearly 500 in Vermont. ASRT fully supports your efforts to ensure that radiologic technologists possess primary and post-primary certifications to perform specialized imaging examinations. We appreciate the opportunity to provide some suggestions to clarify the provisions in 26 V.S.A. chapter 51 as amended in HB 684, Sec. 18.

In reviewing the bill ASRT noticed that language regarding post-primary certification was amended in § 2821b. It is ASRT's position that computed tomography (CT) for attenuation correction may be performed by nuclear medicine technologists on hybrid imaging equipment as part of their primary certification by American Registry of Radiologic Technologists (ARRT) or the Nuclear Medicine Technologist Certification Board (NMTCB) without post-primary CT certification. Additionally, it is ASRT's position is that all technologists should hold post-primary certification in CT from the ARRT or NMTCB as a qualification to perform *diagnostic* CT on hybrid or stand-alone (free-standing) CT units.

ASRT suggests that the language in § 2821b., and amended in HB 684, be revised to read:

(a) The Board recognizes and follows the ARRT and NMTCB post-primary certification process for the following post-primary practice categories:

- (1) mammography;
- (2) computed tomography (CT);
- (3) cardiac-interventional radiography;
- (4) vascular-interventional radiography; and
- (5) positron emission tomography (PET).

(b) In order for a licensee who has obtained one of the three primary ARRT or NMTCB certifications set forth in section 2821a. of this subchapter to practice in one of the post-primary modalities set forth in subsection (a) of this section, the licensee must first obtain

post-primary certification from ARRT or NMTCB for that category, except:

- (1) a radiation therapist may perform CT for treatment simulation;
- (2) a nuclear medicine technologist may perform CT for attenuation correction on hybrid imaging equipment;
- (3) a licensee may perform examinations in a post-primary practice category to meet clinical experience requirements for post-primary certification under the supervision of a technologist who holds post-primary certification in the practice category.

ASRT is available to discuss this suggestion and to answer any questions that you may have. Please do not hesitate to contact me at gmorrison@asrt.org or ASRT Vice President of State Advocacy & Government Relations Christine Lung at cjlung@asrt.org.

Sincerely,



Greg Morrison, M.A., R.T.(R), CNMT, CAE
Associate Executive Director

Cc: Vermont Society of Radiologic Technologists