

To: House Health and Human Services Committee

From: Jacque Amspacker
Executive Director

Date: February 16, 2004

Subject: HB 2698; concerning licensure of radiologic technologists

Thank you for considering the comments of the members of the Johnson- Wyandotte County Medical Society on HB 2698. The bill creates a licensing act for radiologic technologists. While we do not oppose the licensure of this group of health care workers, we cannot support this bill unless an exception is created for radiologic services performed in the physician office setting.

Enactment of this bill will make it illegal for anyone other than a licensed radiologic technologist to operate an x-ray machine for diagnostic or therapeutic purposes. The only exceptions to that requirement are for licensees of the healing arts board (physicians, chiropractors, podiatrists) when they personally provide the service, students, health care providers in the armed services, and dentists, dental hygienists and dental assistants. In other words, any physician who provides x-ray services in his or her medical office would have to employ a licensed radiologic technologist, or a registered x-ray technician, to operate an x-ray unit, regardless of the complexity of the services provided. In many areas of the state, particularly in rural areas, this requirement is simply not reasonable.

During the lengthy debate on this bill in previous years, much time has been dedicated to quality and patient safety. We feel just as strongly about those issues as do the bill's supporters but we remain firmly unconvinced that this bill does anything to address these. It is the current state of the law that the supervising physician is responsible for the competency of those professionals working in his or her office and the physician bears legal liability if services are not performed appropriately. There are already sufficient safeguards in Kansas law and incentives to ensure that these services are performed adequately without adding further administrative constraints.

While we do not oppose licensure for this group, we would respectfully urge you to adopt an amendment that would exempt physician offices from the licensure and registry requirements for radiologic technologists. We are concerned that if this bill applies to physician offices, it will add more unnecessary regulation and cost to the health care delivery system. Thank you for the opportunity to offer these comments.

Sincerely yours,