

January 31, 2017

The Alaska Society of Radiologic Technologists (AKSRT) has been attempting for many years to get legislation passed for state licensure of individuals who perform ionizing radiation procedures in the state of Alaska. This legislation will establish affordable and achievable education and credentialing standards that will ensure competency of all individuals who perform x-ray exams resulting in improved radiation protection and safety for patients and workers and improved patient care.

AKSRT Legislative Affairs Committee members are frequently asked why we need to have licensure in Alaska. The answer is that for every one of the approximately 650 Registered Radiologic Technologists in Alaska there is another person, who is not a registered technologist, performing x-ray exams in the state. Some of these individuals have had formal education in x-ray, some have had a minimum of education and many have had no education at all. To ensure that all patients get the best care possible, we need to make sure all individuals who perform x-ray exams know what they are doing. We need to make certain they know about radiation protection and safety, equipment maintenance and operation, image production and evaluation, radiographic anatomy and positioning procedures. The only way that we can guarantee they know what they are doing is to establish a licensure program in the state that will ensure competency by establishing educational and credentialing standards.

Radiation protection is about safety and the prevention of any undue risk from radiation exposure, it should not be taken for granted as radiation can cause damage to DNA which can increase a person's lifetime risk of developing cancer. In 2010, the FDA recognized this risk and as part of a balanced public health approach launched an initiative to reduce unnecessary radiation exposure from Medical imaging. Forty one states have passed radiology regulations to monitor those who irradiate humans for healthcare purposes.

I encourage the legislature to support education and licensure for individuals who perform x-ray procedures. **HB89 will improve the safety and quality of medical imaging procedures by establishing education and credentialing standards that will ensure competency of all individuals who perform x-ray exams resulting in improved radiation protection and safety for patients and operators and improved patient care.**

Donna Rufsholm, B.S., ARRT (R)(M) CBDT
Alaska Society of Radiologic Technologists
Legislative Affairs Committee Chair

February 1, 2017

HB 89

Honorable Rep. Chris Tuck:

This letter is in response to HB 89 in the current Alaska Legislature, titled **“An Act requiring licensure of occupations relating to radiologic technology, radiation therapy, and nuclear medicine technology; and providing for an effective date.”** This very important document is intended to protect all Alaskans, including patients, device operators and the general public from excessive exposure to ionizing radiation in the health care field. The use of radiation today is a fundamental tool for healthcare practitioners that can reduce pain, reduce health care costs and save lives when used properly. However, in Alaska there are many instances where the use of radiation is abused to the detriment of patients, device operators and the general public because operators are not required to have any formal training, supervision by radiation certified clinical staff or pass a comprehensive radiation safety examination. New technologies have much higher radiation output capabilities yet lack the feedback for untrained operators to recognize that exposures to patient may be as much as up to one hundred times optimum. Excessive exposure to radiation has many deleterious effects including early cataracts, hair loss, cancer (especially breast cancers and leukemia), diminished intellect, shortened life span, missed diagnoses, and other preventable health issues that drive up costs. The key to achieving safer use is quality education of operators by certified training staff.

I urge your support in adopting this legislation to protect Alaskans, including those not yet born.

Thank you.

Clyde E. Pearce
907-350-8076
4610 Campus Circle unit 22
Anchorage, AK 99507

From: Blynn Dahlhamer
To: [Rep. Chris Tuck](#)
Cc: [Kendra Kloster](#)
Subject: HB89 LETTER OF SUPPORT
Date: Thursday, February 02, 2017 3:18:15 PM

Feb. 1, 2017

After living in the bush for twenty years, I have seen the lack of quality x-rays performed by non-trained personnel and/or clinicians. The positioning was more than sub-standard, the exposure techniques were either to under-exposed or over-exposed. There was never a certainty as to how many exposures the patient received before a diagnostic image was obtained. Most of the personnel in the outlying sub-clinics were only given one (1) week of training before they were allowed to perform x-ray exams.

I had another experience in a bush hospital where a physician assistant (PA) stated that he could take the images himself. After I finished my patient, I checked in on the PA and found that his images were over-exposed and position was not correct. He had decided to increase the technique (thinking this would correct the over-exposed image) and took another picture. I stopped him immediately. This patient was unnecessarily exposed due to lack of proper training.

HB89 will establish competency of individuals performing radiation exams through education and credentialing standards. This will improve patient care, radiation protection and safety for the patients and the operators.

Passage of **HB89** will ensure that our children, family and friends will not be exposed to radiation by someone who has had virtually no training in the effects of radiation, positioning, exposure techniques and safety.

Thank you for supporting **HB89** with the educational standards and credentialing.

Blynn H. Dahlhamer R.T. (ARRT) (R)(M)

POB 886

Homer, AK 99603

From: Delaney Jones
To: [Rep. Chris Tuck](#)
Cc: [Kendra Kloster](#)
Subject: House Bill No. 89
Date: Saturday, February 04, 2017 2:17:15 PM

Representative Tuck,

I am writing in support of House Bill No. 89: "An Act requiring licensure of occupations relating to radiologic technology, radiation therapy, and nuclear medicine technology; and providing for an effective date." I was born and raised in Alaska, and am now a first-year student at the University of Alaska Anchorage enrolled in the distance Radiologic Technology program in Juneau.

I believe that adequate education should be a requirement of anyone involved in radiation exposure for diagnostic purposes. An understanding of the potentially harmful effects of radiation and how this can be avoided is essential to ensure the safety of patients and people working in radiologic technology positions. Statewide standards should be required for each and every radiologic technology employee in Alaska. To ensure that proper knowledge and education has been achieved, licensure should be a requirement for employees in Alaska in occupations relating to radiologic technology.

Another reason I support this bill involves the substantial amount of time and money the education program requires. As a current student in this program, I do not think it is fair that I am paying for an education in a state university while this state does not recognize my profession. By the end of this program, I will be more qualified and knowledgeable about radiologic science than other people that are trained on the job, and I will possess the knowledge and training to be able to keep the radiation dose of my patients as low as reasonably achievable. I am going to school to ensure that I receive proper education to perform these skills, and I believe that this should be a requirement.

I appreciate you taking the time to read this, and thank you for sponsoring this bill.

Sincerely,
Delaney Jones

From: claudia@alaskan.com
To: [Rep. Chris Tuck](#)
Cc: [Kendra Kloster](#)
Subject: Support letter for HB089
Date: Friday, February 03, 2017 12:35:25 PM

Representative Chris Tuck:

I am in support of HB089.

An Act requiring licensure of occupations relating to radiologic technology, radiation therapy, and nuclear medicine technology; and providing for an effective date. <?xml:namespace prefix = "o" ns = "urn:schemas-microsoft-com:office:office" />

Most of those who undergo medical procedures involving radiation exposure assume safeguards are in place when nothing could be further from reality. Sadly, in Alaska there are many instances where the use of radiation is detrimental because there are no requirements. Legally, anyone is allowed to administer radiation “take an x-ray” in this state if they are working in a medical practitioners’ office....no minimum education or training required. No education on positioning, radiation protection, safety and shielding for the patient or the person administering the radiation.

New technologies have much higher radiation output capabilities. Untrained or unregulated operators may not know that these exposures could deliver one hundred times the needed dose. Significant aspects of medical imaging and radiation continue to remain unregulated in Alaska. The Basic Operator provision accommodates rural and native concerns while upholding the intent to protect everyone equally from excessive exposure to radiation.

The use of radiation today is a fundamental tool for healthcare practitioners that can reduce pain, reduce health care costs and save lives when used properly. I believe the key to achieving safer use is to require education of operators, especially radiation safety and proper positioning.

I urge your support in adopting this legislation to help lower healthcare costs and protect all who may benefit, including those not yet born.

Please show your support of this important legislation and encourage others to do the same.

Sincerely,

Claudia Tessier

439 Fairway Drive

Fairbanks, AK 99709

907 347-4125

From: Jason Grabowski
To: [Rep. Chris Tuck](#)
Cc: [Kendra Kloster](#); remcclung@alaska.edu
Subject: SB 89
Date: Friday, February 03, 2017 4:33:58 PM

Dear Honorable Christ Tuck,

I am writing to thank you for supporting SB 89. I understand that this bill has appeared in numerous forms over the past few years with little attention by the State government. Many people are opposed to anything that appears to be an unwarranted government regulation, but in this particular instance, requiring radiologic technologist to be certified is paramount.

X-ray exams are not merely a point and shoot affair. I graduated from UAA with a degree in Radiologic Technology in 2013. My degree and national certification proved that I understood what was necessary for a quality diagnostic exam. An in-depth study of anatomy and physiology, physics, proper patient shielding and positioning, and the creation and transmission of x-rays are essential to patient safety and care.

I've worked in hospital, clinical, and, imaging centers. I have seen first-hand how patients have been terribly served by uncertified x-ray staff. Subpar radiologic exams lead to over-radiated patients, mistakes in diagnosis, and higher cost to patients. For example, a radiologist reading exams from clinics performed by uncertified staff, turned to me and asked rhetorically, "What am I supposed to do with this patient's x-ray films? I can't make a diagnosis from these films!" Not only did the patient have to get an unnecessary dose of radiation, he would have to get another dose to hopefully obtain a useful diagnosis. In my experience, this is not an uncommon occurrence, especially from urgent care and doc-in-a-box facilities.

X-rays exams are almost universally required by insurance companies before requesting an MRI or CT. Often, a quality x-ray exam may rule out the need for an expensive MRI or CT. An improper x-ray exam may force a doctor to order a CT or MRI to obtain a diagnosis. In fact, I believe that a credentialed radiologic technologist can help keep the cost down. I'm sure that insurance companies have studied and understood that quality x-ray exams can save themselves as well as their patients' money. A CT can cost up to 10 times more than an X-ray and expose the patient to 10 or more times the amount of radiation.

It is not only the patients who suffer, but the poorly trained staff. Their misunderstanding of x-ray physics can lead to improper shielding and over-exposure that can lead to cancer, cataracts, and complications to a fetus.

Some legislators may believe that requiring certification will burden healthcare providers with unnecessary labor cost; I believe this cost is more than offset by what is gained in patient care and safety.

I thank you for your time and diligence,

Jason Grabowski (RT)

From: Eugene Culp
To: [Rep. Chris Tuck](#)
Cc: [Kendra Kloster](#)
Subject: Support of HB 89
Date: Saturday, February 04, 2017 12:56:00 PM

4 February, 2017

To: Representative Chris Tuck and the Alaska Legislature

As a longtime Alaskan resident I am in support of:

HB 89; "An Act requiring licensure of occupations relating to radiologic technology, radiation therapy, and nuclear medicine technology; and providing for an effective date."

Introduced by Representative Chris Tuck

I am concerned that there is no licensure or standards required in Alaska to perform medical imaging (X-rays, etc.) on patients. Meanwhile licensing is required for Haircutters, Tattoos, Pediatricians, etc. This seems to make no sense as it is well known and documented that many people in the nation or world for that matter are over irradiated from medical imaging.

Science has proven that long term and over dosage has medical consequences such as cancer and other serious affects on humans. In Alaska anybody off the street can give X-rays, hard to believe in this day. I have also read that Alaska's standard for medical imaging ranks in the lowest in the Nation, not something to be proud of.

I realize that the Legislature in is dealing with Alaska's budget problems, but HB 89 would not pose much cost to the state and would be very beneficial in providing safer medical imaging for all Alaskan residents.

Thanks for you consideration,

Eugene Culp
POB 73127
Fairbanks, AK 99707
907.479.4390
eugene@alaskan.com

From: Eve Kincade
To: [Rep. Chris Tuck](#)
Cc: [Kendra Kloster](#)
Subject: HB 89
Date: Sunday, February 05, 2017 1:46:29 PM

Representative Tuck,

I am writing to show my support for HB 89. Requiring licensure for radiologic technologists is very important to the safety of both patients and healthcare workers. The training and education that is part of becoming certified is very safety focused, and requires commitment of the students. Not only paying for the education through a state university, but spending the time and effort it takes to get through the program to get certified nationally, and not have that profession recognized by the state does all of the professionals a great disservice.

Thank you for your time,

Eve Kincade

From: RHONDA MERRIHEW
To: [Rep. Chris Tuck](#)
Cc: [Kendra Kloster](#)
Subject: Regarding H. B. 89
Date: Wednesday, February 08, 2017 9:08:25 PM

Dear Representative Tuck,

As a constituent who lives in your district I want to express my support for H.B. 89. I appreciate the support and help that you have given to this important issue. It is important that you continue to support H.B. 89. This bill recognizes the training and qualifications of radiologic technologists just like me who provides quality patient care with awareness toward patient radiation safety. The bottom line is that everyone in our state deserves to be protected from radiation which is a carcinogen and needs to be administered by a qualified radiologic technologist. Thank you for your attention to this important matter.

Sincerely,

Rhonda Merrihew

Representative Chris Tuck
State Capitol Room 204
Juneau AK, 99801

Dear Representative Tuck:

The legislation HB 89 addressing the licensure of occupational fields related to radiologic technology, radiation therapy, and nuclear medicine is of paramount interest to me because I am a radiologic technologist. This issue directly impacts my profession.

I am primarily concerned with patient care and worry about patient outcomes when individuals who are not adequately trained perform studies that require the use of ionizing radiation. When radiation settings are incorrectly used or when preventable repeat studies are performed the patient ultimately suffers.

Other aspects of this same issue that affect my profession are educational in nature. When an individual is not adequately trained, but performs an imaging study it is a blatant disregard of the knowledge and skill that I worked hard to gain. I believe in the pursuit of knowledge. I paid for an education at a state university, but my profession is not currently recognized by the State of Alaska. I believe that when a person puts in the time and works hard towards a goal they should be recognized for their efforts.

Thank you for your consideration of my viewpoint on this matter. The people of Alaska deserve high quality medical care. This bill provides assurance that Alaskans receive quality care when clinical staff use ionizing radiation in a medical setting. I would like to see this legislation pass and I fully support it.

Sincerely,

Andrew Stefan R.T.(R)(ARRT),
anstefan15@gmail.com

February 9, 2017

The Honorable Representative Chris Tuck
1500 W. Benson Blvd.
Anchorage AK, 99503

RE H.B. 89 Radiologic Technologists – Support

Dear Representative Tuck,

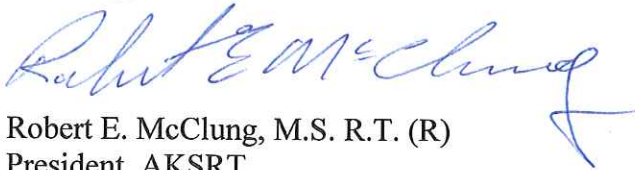
On behalf of the Alaska Society of Radiologic Technologists (AKSRT), an Alaskan professional society representing Radiology Technology students, Radiologic Technologists, Computed Tomography Technologists, Magnetic Resonance Imaging Technologists, Ultrasonographers, Nuclear Medicine Technologists, Radiation Therapists, Mammographers, we would like to affirm and express our strong support for HB 89, the Regulation of Radiologic Technologists.

Our profession provides imaging and therapeutic care using ionizing radiation. We provide instruction to our patients on the risks and effects of radiation. Technologists must determine the appropriate amount of radiation exposure for the part and patient involved. The AKSRT believes to ensure public safety and a professional standard of care it requires regulation to ensure only those trained can safely operate radiation producing equipment.

Some within the community resist passing this bill. However, this places patients, employees, and others at risk of the cumulative effects of radiation. It also does not recognize the continued education required to operate equipment, provide proper patient care in medical imaging, and the initial requirements to enter into the imaging profession.

I am writing as the AKSRT President in support of this legislation and hope you and your colleagues recognize the importance of HB 89. If you have any questions please do not hesitate to call me.

Sincerely,

A handwritten signature in blue ink, reading "Robert E. McClung". The signature is fluid and cursive, with a long horizontal stroke at the end.

Robert E. McClung, M.S. R.T. (R)
President, AKSRT

March 6, 2018

The Honorable Chris Tuck
House Majority Leader, Alaska House of Representatives
State Capitol Room 204
Juneau, AK 99801
Via email: Representative.Chris.Tuck@akleg.gov

Re: House Bill 89

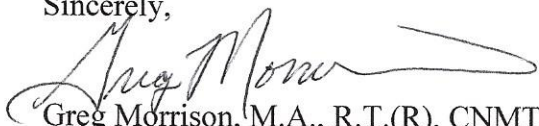
Dear Majority Leader Tuck:

The American Society of Radiologic Technologists (ASRT) represents more than 154,000 medical imaging and radiation therapy professionals, including nearly 400 in Alaska. ASRT is pleased to see that Alaska, one of the few states left in our country that does not license radiologic technologists, is considering a bill to create licensure standards for persons who perform medical imaging and radiation therapy procedures on patients. We strongly support this effort.

After reviewing House Bill 89, the ASRT appreciates the opportunity to express to you some of our concerns regarding this proposed legislation. HB 89, Section 2, creates a licensure program for radiologic technologists. To ensure that Alaska's licensure program is consistent with radiologic technologist licensure programs in other states, ASRT recommends that the language currently in HB 89 be replaced with the attached bill draft.

ASRT appreciates the opportunity to provide input on the development of legislation regarding the licensure of radiologic technologists and look forward to working with you and other members of the Alaska Legislature to ensure that the citizens of your state receive radiologic health care from qualified, highly educated and certified radiologic technologists. If you have any questions, please contact me (gmorrison@asrt.org) or Vice President of State Advocacy & Government Relations Christine Lung (cjlung@asrt.org).

Sincerely,



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

Cc: Alaska Society of Radiologic Technologists
Rep. Sam Kito, Chair, House Labor and Commerce Committee
(Representative.Sam.Kito@akleg.gov)

Attachment: 2018 AK HB 89 ASRT CS.docx

Testimony of the International Society for Clinical Densitometry
**HB 89 "An Act Requiring Licensure of Occupations Relating to Radiologic
Technology, Radiation Therapy, and Nuclear Medicine Technology"**
March 7, 2018
Labor and Commerce Committee

Dear Representative Kito, Representative Wool and members of the Committee:

I am writing on behalf of the International Society for Clinical Densitometry (ISCD) regarding **HR 89, An Act Requiring Licensure of Occupations relating to Radiologic Technology, Radiation Therapy and Nuclear Medicine Technology**. The ISCD shares the goal of insuring competency of individuals performing radiologic procedures, including bone density testing. However, we are suggesting an amendment to the bill to include bone densitometry as an appropriate area for a limited license and to recognize the **ISCD's National Commission for Certifying Agencies (NCCA) accredited technologist certification program (CBDT®)** for individuals performing bone density testing.

Bone density testing is used to diagnose and treat osteoporosis, a disease that results in over 2 million fractures in the United States each year. The need for accurate bone density testing is a critical tool in fighting osteoporosis and reducing the number of these fractures. As Alaska adopts a new framework to regulate radiologic technologists, we urge you to incorporate the ISCD's certification program for bone density testing.

The ISCD is the oldest and largest certifier of bone density technologists in the United States. Our mission is to advance excellence in the assessment of skeletal densitometry through certification, education, and facility accreditation programs. Our certification programs **are designed to ensure competency in the field of bone densitometry**. Successful candidates receive the designation of Certified Bone Densitometry Technologist (CBDT). The CBDT credential meets all the standards for the accreditation of certification programs, as established by the NCCA, and is evaluated annually by the NCCA to ensure continued compliance.

ISCD certification lends assurance to patient and payers that an individual has achieved a high level of competency in the field of bone densitometry and is recognized by other state regulators and Medicare providers (see attached for examples). Our certification program currently has 1,443 Certified Bone Density Technologists (CBDT) in the United States, **including eight people in the state of Alaska.**

As currently drafted, these highly qualified and trained bone density technologists are excluded from the legislation. Specifically, **Sec 08.89.150(b)(3) Qualifications for a limited radiologic imager**, excludes limited licensees from performing bone densitometry.

We urge you to follow the path of many other states and include bone densitometry as an appropriate area to obtain a limited license, provided that individual is certified by either the International Society for Clinical Densitometry or the ARRT in bone densitometry.

At the end of this letter is a more comprehensive description of the ISCD and our Certified Bone Densitometry Technologist program. I would be happy to provide additional information or to speak with you about the legislation. My contact information is listed below.

Thank you very much for your consideration of this important issue.

Sincerely,



Robert Blank, MD, PhD

Description of the International Society for Clinical Densitometry and the Certified Bone Densitometry Technologist program

Certified Bone Densitometry Technologist (CBDT®) is a professional certification accredited by the National Commission for Certifying Agencies (NCCA) in the field of bone densitometry for technologists who *perform* bone