



Economic Impact Analysis Virginia Department of Planning and Budget

18 VAC 85-101 – Regulations Governing the Licensure of Radiologic Technologists-Limited

Department of Health Professions

September 9, 2002

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.G of the Administrative Process Act and Executive Order Number 21 (02). Section 2.2-4007.G requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. The analysis presented below represents DPB's best estimate of these economic impacts.

Summary of the Proposed Regulation

The Board of Medicine (board) proposes to: 1) require persons training as radiologic technologists-limited to gain practical experience in the radiologic procedures for which they are seeking licensure, 2) establish provisions for traineeships for radiologic technologists-limited that are similar to the traineeships for radiologic technologists, 3) prohibit the performance of certain procedures by radiologic technologists-limited for which they are not trained or tested, and 4) eliminate the requirement for an applicant for licensure as a radiologic technologist to submit documented evidence of her graduation from an educational program accepted by ARRT.

Estimated Economic Impact

According to the Department of Health Professions (department), when the American Registry of Radiologic Technologists (ARRT) examination was first required for licensure as a radiologic technologist-limited, the cut score set by the board was 75. Faced with a very poor

passage rate, the board decided to lower the cut score to the score recommended by ARRT, 65. The passage rate has dramatically improved,¹ but there has been a significant amount of dissatisfaction expressed by practitioners with the skill level of some limited licensees. The board has also heard from educators who believe that under the current regulations radiologic technologists-limited receive inadequate training.

Consequently, the board proposes to require that individuals seeking radiologic technologists-limited licensure provide evidence of having successfully performed in a traineeship at least ten radiologic examinations in the anatomical area for which they are seeking licensure under the direct supervision and observation of a licensed radiologic technologist or a doctor of medicine or osteopathy. Similar to the existing traineeship for individuals seeking radiologic technologist licensure, the traineeship for an applicant for licensure as a radiologic technologist-limited terminates fourteen days after receipt by the candidate of the licensure examination results or, if the training for limited licensure in bone densitometry or abdomen and pelvis, fourteen working days after completion of the required number of procedures. A notarized statement from the supervising practitioner shall attest to the applicant's competency in the areas of radiation safety, positioning, patient instruction, anatomy, pathology, and technical factors.

The proposed traineeship and demonstrated competency requirement is beneficial in that it provides information to employers and potential employers of radiologic technologists-limited concerning actual experience and demonstrated skill level. Employers seeking someone who already likely possesses enough skill to work without direct supervision will know to only interview individuals who are already fully licensed as a radiologic technologist-limited. Employers who hire an individual in a traineeship will know that the new hire will initially require direct supervision. Overall, individuals that have qualified for limited licensure will likely command a higher starting salary than individuals who have yet to demonstrate competency. Thus individuals who have demonstrated evidence of their acquired skills will receive higher pay commensurate with their skill level with the proposed traineeship and demonstrated competency requirement. The increased information provided to employers concerning the skill level of the radiologic technologist may also reduce the probability of

¹ Source: Department of Health Professions

mistakes that may adversely affect patients, since the supervisor will have a better idea of how much supervision is required.

The board proposes to prohibit performance of fluoroscopic procedures, computerized tomography, and vascular-interventional procedures by radiologic technologists-limited since those procedures are not covered on the ARRT examination for Limited Scope of Practice in Radiography and considered to be outside the scope of practice for a person with a limited license. According to the department, radiologic technologists-limited are not known to have been performing these procedures. Thus, the proposed prohibitions will have little impact. Explicitly adding the prohibitions to the regulations may help prevent any potential confusion as to whether radiologic technologists-limited are competent to perform the listed procedures.

The board proposes to eliminate the requirement for an applicant for licensure as a radiologic technologist to submit documented evidence of her graduation from an educational program accepted by ARRT. The documented evidence is unnecessary since AART requires the submission of transcripts documenting graduation as a prerequisite for sitting for the ARRT examination. Successful applicants radiologic technologist license must pass the ARRT certification exam. Since applicants will save the time and costs associated with documenting and sending evidence of their graduation and the board has no need of the information, this proposed change clearly produces a net benefit.

Businesses and Entities Affected

The proposed amendments affect the 918 persons licensed as radiologic technologists-limited, the 2,309 persons licensed as radiologic technologists, their employers and potential employers, their patients and potential patients, and individuals interested in becoming licensed as a radiologic technologist-limited or radiologic technologist.

Localities Particularly Affected

The proposed regulations affect all Virginia localities.

Projected Impact on Employment

The proposed amendments will not significantly affect employment levels.

Effects on the Use and Value of Private Property

The proposed amendments will not have a large impact on the use and value of private property.