



# The Commonwealth of Massachusetts

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## Instructions for Physician Assistants (PAs) Regarding the Operation of Fluoroscopic Systems

Under Massachusetts regulations, PA's are authorized to operate fluoroscopic systems following the completion of both didactic and clinical training, and achievement of a passing grade on an examination provided through the American Registry of Radiologic Technologists (ARRT). The following outlines the specific steps that PA's must follow in order to legally practice fluoroscopy in any Massachusetts hospital, clinic or related healthcare facility. Regulations promulgated by the Massachusetts Radiation Control Program (RCP) in 105 CMR 120.405(K) and the Board of Registration of Physician Assistants (BORPA) in 263 CMR 5.04 and 5.08 describe the specific requirements for PA's to operate fluoroscopic systems.

1. PA's must complete 40 hours of didactic training on fluoroscopy, and an additional 40 hours of clinical training in the place of employment where the procedure will be carried out. At this time, an approved on-line training is offered through the American Association of Physician Assistants (AAPA). Information on this didactic training may be found at <http://www.aapa.org>. Other didactic trainings on fluoroscopy must first be approved by RCP in order to qualify the PA to practice fluoroscopy procedures.

Clinical training requires 40 hours performing fluoroscopic procedures under the direct supervision of a physician who meets the requirement of 105 CMR 120.405(K)(1)(a) or (b), or under a medical physicist, or a radiography educator. The record of such training should identify the specific fluoroscopic procedure, hours of training, and the printed name and signature of the supervising physician, medical physicist or radiographer.

2. Following completion of both trainings, PA's must submit to the Massachusetts Radiation Control Program the following:

- Proof of completion of approved didactic training on fluoroscopy in the form of a signed original certificate or a notarized copy of the certificate.
  - Proof of completion of clinical training on fluoroscopic procedures at his/her place of employment as described above.
  - A letter from the supervising physician confirming that the PA is qualified to carry out the specific fluoroscopic procedures and has completed necessary training.
  - A copy of the contract between the PA and the supervising physician.
  - A completed form (*Request to take the ARRT Fluoroscopy Examination*) to include name, address, and additional information.
  - These materials should be mailed to the Massachusetts Radiation Control Program (faxes and emailed copies will not be accepted).
3. Upon receipt and review of these documents, the RCP will recommend the candidate to the ARRT to take the fluoroscopy exam.
  4. The PA candidate may register for the exam directly with the ARRT by following one of these two steps: 1. Online payment by Credit Card at [www.StateRHC.org](http://www.StateRHC.org). 2. Payment via USPS requires a copy of the letter from the RCP and a cashier's check or money order made payable to the ARRT. Payments should be mailed to: ARRT, ATTN: StateRHC, 1255 Northland Drive, St. Paul, MN, 55120.
  5. Following testing, the ARRT will submit a copy of the grade to RCP, who will then provide the grade to the applicant with a copy to the PA Board. The passing grade of 75% is set by the ARRT, and must be met in order to perform fluoroscopic procedures.
  6. The RCP will maintain copies of the documents noted above and also the grade from the ARRT examination.
  7. The PA should ensure that the same information is provided to and available at their workplace in order to allow verification of competency to carry out fluoroscopic procedures by RCP inspection staff.
  8. In the event a PA changes the place of employment, new documentation from the supervising physician at the new institution should be submitted to RCP and to BORPA.

9. PA's interested in continuing to carry out fluoroscopic procedures should maintain compliance with both BORPA and with RCP regulations as required on an ongoing basis.
10. The RCP carries out regular inspections at hospitals, clinics and related healthcare facilities where fluoroscopy procedures are performed. The qualifications of PA's performing fluoroscopic procedures and compliance with 105 CMR 120.405 (K) will be verified during these inspections. Violations of RCP regulations will be reported to the facility where the PA is employed, and findings will also be shared with BORPA.
11. PA's should contact BORPA or RCP for additional information and regulatory requirements.