



## Texas Radiation Advisory Board

Michael Ford, C.H.P.  
Chair

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Executive Committee  
Jimmy Barker, P.E.  
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W. Kim Howard, M.D.  
Elaine Wells, M.S.

January 30, 2003

Eduardo Sanchez, M.D.  
Commissioner  
Texas Department of Health  
1100 W. 49<sup>th</sup> Street  
Austin, Texas 78756

Dear Dr. Sanchez:

The Texas Radiation Advisory Board recommended at its January 25, 2003, meeting that the Texas Department of Health conduct a study to evaluate the need for a Radiologic Practitioner Assistant (RPA) program in Texas and to determine the appropriate legislation needed to institute such a program.

Several states have answered this need by creating the role of Radiologic Practitioner Assistant (RPA). The RPA is *not* a Physician's Assistant (PA) as defined under current state regulations. Instead, the RPA is a certified Radiologic Technologist (RT) who has undergone additional training in patient assessment and procedural protocol in order to better assist the radiologist. The RT's background in imaging gives him/her unique abilities in imaging studies not encountered in other areas of medicine.

While there are several RPA training programs in other states and there is a national certification body for RPAs, there is currently no method to recognize this occupation in Texas. According to Mr. Dan Meador, Assistant General Counsel for the RT Program, Occupational Code 601.002(6), which establishes the RT Board, limits its jurisdiction to the radiologic arts and would not allow it to expand the role of the RT by establishing an RPA program.

One option is to recognize the RPA's role as a RT, allowing him/her to perform radiographic procedures while using the current rules on delegation of duties by physicians [Texas Occupations Code 157.001(A)] to cover the other aspects of his/her work.

A second possibility is to introduce legislation to either expand the jurisdiction of the RT Board to cover this occupation or to create a new board specific to RPAs.

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Understanding that the department's resources are even more limited than usual due to the anticipated budget shortfall, the Texas Radiation Advisory Board respectfully requests that the Texas Department of Health undertake the important activity of conducting a study to evaluate the need for a RPA program in Texas and to determine the appropriate legislation needed to institute such a program so that action can be taken in the near future.

If you have any questions, please feel free to contact Kim Howard, MD, Chair of the TRAB Medical Committee. (Telephone: 903/315-2072). Thank you for your time and assistance. Please let us know if we can provide any assistance in this matter.

Sincerely,  
Original signed by:

Michael Ford, C.H.P.  
Chair

cc: Debra Stabeno  
Rick Bays