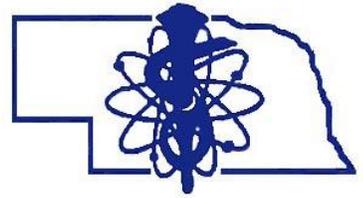


The Nebraska Society of Radiologic Technologists
An Affiliate of the American Society of Radiologic Technologists



April 30, 2019

Nebraska Department of Health & Human Services
Credentialing Review Program
PO Box 94986
Lincoln, Nebraska 68509-4986

Members of the Emergency Medical Services Credential Review Committee,

On behalf of the Nebraska Society of Radiologic Technologists, I am bringing concerns we have regarding the performance and interpretation of medical imaging procedures by Critical Care Paramedics as proposed in the credential review application.

The Nebraska Society of Radiologic Technologists (NSRT) feels that the performance and interpretation of any medical imaging procedure should only be facilitated by individuals who are educationally prepared & clinically competent to do so. The structured education for a Medical Radiographer, individuals whom perform imaging studies, ranges from two to four years and beyond. The structured education for radiologists, which often includes specialized fellowships, can take more than 10 years to complete.

The NSRT would ask the Technical Review Committee to closely review the educational structure provided to Critical Care Paramedics with regard to medical imaging. Are they educationally & clinically prepared to perform detailed imaging procedures such as Focused Assessment Sonography studies? Are Critical Care Paramedics educationally & clinically prepared to interpret complex Computed Tomography studies in the assessment of hemorrhagic or anoxic brain injuries? There is substantial liability associated with the interpretation of medical imaging procedures. What happens if the Critical Care Paramedic makes an incorrect interpretation of a stroke & administers a thrombolytic agent to a patient with a small, hard to distinguish hemorrhagic stroke? Where does the liability lie?

We also would raise the question of insurer structure with the current proposal. Are private insurers and Medicare covering the cost of the proposed imaging studies or will this be a cost that the patient incurs? Medical transport, both ground & air, is already expensive without the addition of possibly unnecessary FAST exams.

The NSRT strongly feels that it is in the best interest of Nebraskan's to limit the performance & interpretation of imaging studies to those currently licensed to do so. The Radiation Practice Act clearly delineates individuals that are qualified to perform these complex imaging studies. We ask that the Technical Review Committee consider excluding the medical imaging components of the application before you.

Regards,

The Nebraska Society of Radiologic Technologists Board of Directors