



February 12, 2021

The Honorable Evan Vickers
Utah Senate
320 State Capitol
Salt Lake City, Utah 84114

Re: Opposition to S.B. 27

Dear Majority Leader Evan Vickers:

On behalf of the American College of Radiology (ACR)¹, I am writing to express our concern with Senate Bill (S.B.) 27. This bill would allow physician assistants (PAs) to order, perform, and interpret diagnostic studies and therapeutic procedures. This lack of definition of “diagnostic studies” could include interpretation of x-ray or advanced imaging procedures. ACR recommends clarifying “diagnostic studies” by adding, “For radiologic procedures, a physician assistant can order diagnostic procedures and utilize the findings or results in treating the patient”.

Including medical school, the majority of physician radiologists undergo 10 years of comprehensive training beyond their undergraduate degree. The four-year medical school requirement is foundational to the practice of medicine in that it entails a comprehensive understanding of the human body, its systems, functions, and disease processes. While in medical school, radiologists learn anatomy, physiology, pathology, pharmacology, and pathophysiology as is required of all graduating physicians. Medical school is followed by a one-year clinical internship, and a four-year residency program interpreting tens of thousands of imaging studies under the supervision of a practicing radiologist. Radiology residents typically spend at least four weeks (130 lecture hours) in an intensive Radiologic Pathology Correlation Course entailing a comprehensive review of all imaging modalities, the radiologic presentation of a broad range of diseases and pathologic basis from all organ systems, with emphasis on the principles of radiologic-pathologic correlation. Most radiologists elect to continue their training with a one- or two- year post-residency fellowship program in a radiology subspecialty to hone their diagnostic skills in a radiology subspecialty.

By sharp contrast, the current physician assistant education model is two years with 2,000 hours of clinical care and includes no residency requirement. Whereas radiologists are trained interpreting tens of thousands of imaging, PAs have no such requirement. This lack of training demonstrates why radiologists are uniquely qualified to perform and interpret diagnostic studies and advanced imaging procedures.

We urge you to ensure patient safety and ensure the definition diagnostic studies does not include x-ray and advanced imaging procedures in S.B.27.

Thank you for your consideration. Please contact Eugenia Brandt or Tina Getachew in ACR’s Government Relations office at ebrandt@acr.org or tgetachew@acr.org if you have questions or need additional information.

¹ The American College of Radiology is a professional organization representing more than 40,000 radiologists, radiation oncologists, interventional radiologists, nuclear medicine physicians, and medical physicists.

Sincerely,

Dr. Maryellyn Gilfeather
President, Utah Radiological Society

cc: Senate Minority Leader Karen Mayne