



17 December 2019

VIA EMAIL: regulations@cdph.ca.gov

California Department of Public Health
Office of Regulations
1415 L Street, Suite 500
Sacramento, CA 95814

RE: Radiologic Technology Act Regulations: RTCC Recommendations (DPH-17-009)

Thank you for the opportunity to provide further comment to the proposed rulemaking amending Title 17 of the California Code of Regulations. The Alliance of Cardiovascular Professionals supports the work of the RTCC, as we have been involved with this body since early 2013 in an effort to ensure patient safety in all healthcare environments in which radiology and imaging are applied.

I appreciate the time Mr. Phillip Scott took to explain the proposed changes to me. After he clarified the language defining the “non-permitted individual” and the “user” and how they were different, it was understood that the revisions do allow an educated cardiovascular credential holder (an RCIS) to practice under section 30305.5. With over 500 professionals serving California as professional invasive specialists, it is essential these individuals continue serving in their capacity to ensure the highest quality care in the state. As we have demonstrated repeatedly, invasive cardiovascular professionals are appropriately educated, well trained and the preferred professionals assisting cardiologists. They are the only non-physician professionals trained in cardiac cath lab environment, specifically. And while they are credentialed, they are not licensed—and as such, they do not pass along associated costs to patients, or the facilities through which they are employed.

We remain concerned, however, that the language in the regulations could be easily confused, resulting in regulators disallowing RCIS’ participation, accordingly. Specifically, the language of 30305.5 (b) where a user may allow a non-permitted individual as long as the hospital (user) holds an S&O and the non-permitted individual does not actuate or energize the equipment (RCIS) is allowed. We anticipate that some hospitals may interpret this to require the non-permitted individual to require an S&O permit (vs. the hospital). It is for this reason, we would request that a clarifying memo of guidance be issued or available on record clearly explaining that an RCIS may, in fact, provide the assistance to the cardiologist as long as the hospital’s competencies and requirements have been met appropriately.

Thank you for the opportunity to continue to clarify regulations in an effort to provide the highest quality of care in the state of California. We look forward to further discussion, interpretation and assurances that appropriate individuals, including RCIS credential holders, may provide care and assist with fluoroscopy in the cardiac cath lab.

If you have any questions or need further information, please contact me.

Sincerely,