



THE OHIO SOCIETY OF RADIOLOGIC TECHNOLOGISTS

To: The Ohio Department of Health

From: The Ohio Society of Radiologic Technologists

RE: 3701-72-01 (X)

This letter is in response to the proposed changes to the definition of “Radiographer.”

The Ohio Society of Radiologic Technologists is not in support of the proposed change to remove the words “administers contrast media” in the definition of “Radiographer” as we believe the ORC 4773 does not prohibit the inclusion of practice standard criteria within the rules and regulations. The current definition of “Radiographer” defines an individual who performs a comprehensive scope of diagnostic radiologic procedures.

Rationale presented to remove this statement which referenced Ohio Revised Code 4729.01 was incorrect. This ORC only addresses prescribing dangerous drugs and not the administration of them as listed. Administrative rights of medication injections are governed by individual medical practice boards. In the absence of a Radiation Science Licensing Board, we believe the Bureau of Radiation Protection, Ohio Department of Health serves this role. Due to this, the National Practice Standards should be included in the Ohio Department of Health Rules and Regulations. We also strongly support acknowledgement of national practice standards within the rules and regulations regarding radiation therapy, nuclear medicine and radiography licensees.

Thank you for consideration of this request.

Respectfully Submitted,

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