

NSRT Response to LB 936: Recommended Amendments Clarifying Collaboration and Educational Expectations

Purpose

- Clarify legislative intent in LB 936 by emphasizing collaboration and specifying education requirements for Nurse Practitioners utilizing fluoroscopy while preserving access to care and protecting patient safety.

Collaboration Matters

- Licensed medical radiographers are specifically trained in radiation protection, dose minimization, patient positioning, and image optimization and working in both urban and rural hospital settings to provide medical imaging care, including fluoroscopy to Nebraskans.
- Best practice relies on a team-based model pairing provider clinical judgment with radiographer radiation-safety expertise.
- Radiographers do not need “directing”, as they are highly trained professionals who may collaborate with other health professionals in the best interest of the patient.

Education Must Be Clearly Defined

- Current language places approval of fluoroscopy education solely with the Board of Nursing, without assurance of radiologic health expertise.
- Education requirements should be explicit in statute, not deferred to future rulemaking.

Nebraska Medical Radiography Licensing History

- Mid-1980s: NSRT sought licensure for Medical Radiographers and Limited Operators through the 407 processes. At that time, physicians and PAs were exempt with intent limited to general radiography, not fluoroscopy, without formal radiation education.
- 2007: CRNAs are allowed to utilize fluoroscopy only in conjunction with a licensed medical radiographer.
- In the bill proposed, Nurse Practitioners may practice without physician supervision or radiographer collaboration, raising concerns about training standards and oversight.

Public Interest

- Clear language protects patients, ensures statewide consistency, and reduces regulatory ambiguity.
- Collaboration strengthens safety without limiting scope of practice.

Recommended Amendments

Section 38-1915 (1)(b) to read as follows:

(b) A medical radiographer may also utilize fluoroscopy ~~under the direction of, or~~ in collaboration with, a nurse practitioner pursuant to section 38-2315

Section 38-2315 (5) to read as follows (as consistent with CRNA statute):

(5) A nurse practitioner may ~~perform and~~ utilize fluoroscopy in collaboration with a licensed medical radiographer for procedural guidance and for the performance of authorized duties upon the nurse practitioner's successful completion of appropriate education and training an educational fluoroscopy program designed by a national professional body, approved jointly by the department and the board. Such education and training shall be in accordance with rules and regulations adopted and promulgated pursuant to section 71-3508. ~~A nurse practitioner may also direct fluoroscopy in collaboration with a licensed medical radiographer.~~

AAPA, (2009). Fluoroscopy Educational Framework for Physician Assistants, https://www.aapa.org/wp-content/uploads/2016/12/Fluoroscopy_Educational_Framework_ASRT_AAPA.pdf