

May 2017

The WA Department of Health is proposing amendments to licensing rules to address the military education and training equivalency specific to the regulated imaging professions.

The hearing on the Military issue is on May 26 at 9:30 a.m. at the Washington Department of Health, Town Center 2, Room 145, 111 Israel Road SE, Tumwater, WA 98501.

WSRT Position Statement:

The Washington Society of Radiologic Technologists strives to give medical imaging and radiation therapy professionals the knowledge, resources, and support they need to provide quality medical care.

It is the position of the WSRT that military personnel should not be grandfathered in and automatically receive American Registry of Radiologic Technologist (ARRT) credentialed status based on their military experience alone and that they must acquire the same education and ARRT credentials as all other individuals who meet current educational and professional status as recognized by the ARRT.

Information provided by the WA DOL that is intended to be adopted in June 2017.

NEW SECTION

Yellow Highlights represent areas that the ASRT Military Chapter is questioning.

Blue Highlights represent the comments the ASRT Military Chair made in response to the proposed rule changes.

WAC 246-926-145 Military equivalency. (1) The department accepts military education, training, or experience as described in subsections

(4) through (8) of this section as meeting the corresponding education, training, or experience requirements.

(2) For the purposes of this section, these terms shall have the following meaning:

(a) "ARRT" has the same meaning as WAC 246-926-020(1).

(b) "CAAHEP" means the Commission on Accreditation of Allied Health Education Programs and includes its prior organization, the

Committee on Allied Health Education and Accreditation (CAHEA).

(c) "JRCCVT" means the Joint Review Committee on Education in Cardiovascular Technology.

(d) "JRCERT" means the Joint Review Committee on Education in Radiologic Technology.

(e) "JRCNMT" means the Joint Review Committee on Educational Programs in Nuclear Medicine Technology.

(f) "METC" means the Department of Defense, Defense Health Agency, Medical Education and Training Campus.

(g) "NMTCB" means the Nuclear Medicine Technology Certification Board.

(3) Acceptable documentation to verify radiologic technology education, training, and experience for current or former U.S. Military service members includes:

(a) A copy of the service member's Certificate of Release or Discharge

from Active Duty (DD Form 214, Member-4 copy; or NGB-22 for National Guard);

(b) Joint Service Transcript or JST/Sailor-Marine American Council

on Education Registry Transcript or SMART;

(c) Army American Council of Education, or ACE, Registry Transcript

System or AARTS;

(d) Application for the Evaluation of Learning Experiences During

Military Service (DD Form 295) certified by the service member's service

(e) Any other military transcripts and forms that document the service member's military training and experience, such as the Community

College of the Air Force or CCAF.

(4) For diagnostic-radiographer radiologic technologists, the following are the acceptable military education, training, or experience:

(a) (i) The METC Tri Service Radiology program has been JRCERT accredited since 2011 and meets the school approval requirement in WAC 246-926-140; CONCERN OF MILITARY CHAPTER OF ASRT:

Graduates from METC must complete a phase 2 program in addition to obtaining an associate's degree to be eligible to take the ARRT exam.

(ii) Formal pre-METC U.S. Army, Navy, or Air Force radiologic technologist diagnostic-radiographer education programs have been determined by the department to meet the requirements in WAC 246-926-110;

(iii) Informal U.S. Army, Navy, or Air Force radiologic technologist diagnostic-radiographer education programs, such as U.S. Navy on the-job training commonly referred to as **"fast**

track," CONCERN OF MILITARY CHAPTER OF ASRT: Never heard of "fast track". OJT was done primarily to get someone up to speed before they went to x-ray school. OJT is used for CT, MRI and Sonography cross training.

must meet all the requirements in WAC 246-926-110; or

(iv) **The secretary will review U.S. Coast Guard education, training, and experience on a case-by-case basis to determine if training and scope of practice meets the requirements in WAC**

246-926-110. CONCERN OF MILITARY CHAPTER OF ASRT: The Coast Guard sends its students to METC. Prior to the establishment of METC, all Coast Guard technologists were graduates from the Naval School of Health Sciences.

(b) All applicants applying under (a) of this subsection must provide proof of successful passage of the ARRT radiographer radiologic technologist examination or the Washington state examination identified in WAC 246-926-190, with the exception of those applicants who completed a pre-METC program that was accredited by the JRCERT at the time the applicant completed it.

(5) For therapeutic-radiation therapy radiologic technologists, the following are the acceptable military education, training, or experience:

(a) (i) As of the effective date of this rule, METC does not offer a therapeutic radiologic technologist education program. Formal pre-METC U.S. Army, Navy, or Air Force therapeutic radiologic technologist education programs have been determined by the department to meet the requirements in WAC 246-926-120;

CONCERN OF MILITARY CHAPTER OF ASRT: There are no military trained Radiation Therapists. Any training is OJT. All therapists employed by the DOD are civilian contractors and civilian trained.

(ii) Informal U.S. Army, Navy, or Air Force therapeutic radiologic technologist education programs must meet all the requirements in WAC 246-926-120; or

(iii) The department will review U.S. Coast Guard education, training, and experience on a case-by-case basis to determine if training and scope of practice meets the requirements in WAC 246-926-120. **CONCERN OF MILITARY CHAPTER OF ASRT:** The Coast Guard has no Radiation Therapists.

(b) All applicants applying under (a) of this subsection must provide proof of successful passage of the ARRT therapeutic radiologic technologist examination or the Washington state examination identified in WAC 246-926-190.

(6) For nuclear medicine radiologic technologists, the following are the acceptable military education, training, or experience:

(a) (i) As of the effective date of this rule, METC does not offer a JRCNMT accredited nuclear medicine radiologic technologist education program. Formal pre-METC U.S. Army, Navy, or Air Force radiologic technologist nuclear medicine programs completed from June 1, 1972, through August 31, 2012, meets the school approval requirement in WAC 246-926-140; **CONCERN OF MILITARY CHAPTER OF ASRT:** Pre-METC, all Nuclear Medicine training for all branches was completed at the Naval School of Health Sciences. The Coast Guard has no Nuclear Medicine Technologists.

(ii) The METC nuclear medicine radiologic technologist education program is accredited by the ARRT. The department has determined this program meets the requirements in WAC 246-926-130; **CONCERN OF MILITARY CHAPTER OF ASRT:** Does the ARRT accredit NM programs?

(iii) Non accredited formal nuclear medicine education programs not identified in subsection (4) (a) of this section has been determined by the department to meet the requirements in WAC 246-926-130;

(iv) Informal U.S. Army, Navy, or Air Force radiologic technologist nuclear medicine education programs must meet all the requirements in WAC 246-926-130; or

(iii) Nonaccredited formal nuclear medicine education programs not identified in subsection (4) (a) of this section has been determined by the department to meet the requirements in WAC 246-926-130;

(iv) Informal U.S. Army, Navy, or Air Force radiologic technologist nuclear medicine education programs must meet all the requirements in WAC 246-926-130; or

(v) The department will review U.S. Coast Guard education, training, and experience on a case-by-case basis to determine if training and scope of practice meets the requirements in WAC 246-926-130.

(b) All applicants applying under (a) of this subsection must provide proof of successful passage of the NMTCB examination, the ARRT nuclear medicine radiologic technologist examination, or the Washington state examination identified in WAC 246-926-190.

(7) For cardiovascular invasive specialists, the following are acceptable military education, training, or experience:

(a) (i) The METC cardiovascular technologist program is CAAHEP accredited, which includes JRCCVT accreditation, and meets the school approval requirement in WAC 246-926-410. Formal pre-METC U.S. Army, Navy, or Air Force cardiovascular technologist education programs that were accredited by CAAHEP, which includes its prior organization CAHEA,

also meet the school approval requirement in WAC 246-926-410;

(ii) Formal pre-METC U.S. Army, Navy, or Air Force cardiovascular technologist education programs that were not accredited by CAAHEP or CAHEA have been determined by the department to meet the requirements in WAC 246-926-410 (1) (a);

(iii) Informal U.S. Army, Navy, or Air Force cardiovascular technologist education programs, such as on-the-job U.S. Navy training commonly referred to as "fast track," must meet all the requirements in WAC 246-926-410 (1) (a) and (b); or

(b) The department will review U.S. Coast Guard education, training, and experience on a case-by-case basis to determine if training and scope of practice meets the requirements in WAC 246-926-410.

(c) All applicants applying under (a) of this subsection must provide proof of successful passage of an examination identified in WAC 246-926-410 (1) (b) or (2).

(8) Radiologist assistant. There is currently no radiologist assistant- equivalent occupation in the U.S. Army, Navy, Air Force, or Coast Guard. The department will review an individual's military training and experience record on a case-by-case basis; however, individuals who have obtained a passing score on the ARRT registered radiologist assistant examination shall be considered to have met the education and training requirements for certification as a radiologist assistant.

AMENDATORY SECTION (Amending WSR 10-10-043, filed 4/27/10, effective 5/28/10)

WAC 246-926-310 What are the requirements to be certified as a radiologist assistant?

- (1) Individuals wanting to be certified as a radiologist assistant must:
 - (a) Graduate from an educational program recognized by the ARRT;
 - (b) Obtain a passing score on the national ARRT registered radiologist assistant examination; and
 - (c) Submit the application, supporting documents, and fees to the department of health.
- (2) An individual certified as a radiologist practitioner assistant through the certification board of radiology practitioner assistants who takes and passes the national ARRT registered radiologist assistant examination by December 31, 2011, shall be considered to have met the education and examination requirements for certification as a radiologist assistant.
- (3) Military education, training, and experience may meet certification requirements as outlined in WAC 246-926-145.

AMENDATORY SECTION (Amending WSR 12-10-094, filed 5/2/12, effective 5/3/12)

WAC 246-926-410 Requirements for cardiovascular invasive specialist certification.

- (1) Applicants for certification as a cardiovascular invasive specialist must meet the following requirements:
 - (a) Graduate from an educational program accredited by the Commission on Accreditation of Allied Health Education Programs (CAAHEP) utilizing the standards and criteria established by the Joint Review Committee on Education in Cardiovascular Technology (JRC-CVT); and
 - (b) Obtain a passing score on the national Registered Cardiovascular Invasive Specialist (RCIS) examination administered by Cardiovascular Credentialing International (CCI).
- (2) Individuals who have been certified or registered with one of the following national organizations shall be considered to have met the education and training requirements:
 - (a) CCI through the RCIS examination;
 - (b) CCI through the Registered Cardiac Electrophysiology Specialist (RCES) examination;
 - (c) Heart Rhythm Society (HRS) through the International Board of Heart Rhythm Examiners (IBHRE), formerly the North American Society of Pacing and Electrophysiology (NASPE) examination; or

(d) ARRT through the Cardiac Interventional Radiographer (RTR-CI) post-primary examination, the Vascular Interventional Radiographer (RTR-VI) post-primary examination, or the Cardiovascular Interventional Radiographer (RTR-CV) post-primary examination.

(3) Military education, training, and experience may meet certification requirements as outlined in WAC 246-926-145.