

MEDICAL BOARD OF CALIFORNIA  
LEGISLATIVE ANALYSIS

BILL NUMBER: AB 3097  
AUTHOR: Chen  
BILL DATE: April 10, 2024, Amended  
SUBJECT: Radiological Assistants  
SPONSOR: American Registry of Radiologic Technologists  
POSITION: Neutral

DESCRIPTION OF CURRENT LEGISLATION

Prohibits a person from holding themselves out as a radiologist assistant (RA) or using the RA title or any other term to imply or to suggest that the person is an RA unless the person meets specified requirements. Establishes a scope of practice for an RA to work only under the supervision of a radiologist.

RECENT AMENDMENTS

Since the prior meeting of the Medical Board of California (Board), AB 3097 was amended to remove the language that established the Radiologist Assistant Committee within the Board, including language related to the registration requirements for RAs.

Due to those amendments, the Board removed its Oppose position and is now neutral on this bill.

BACKGROUND

[Medical Assistants](#) are unlicensed individuals, who perform non-invasive routine technical support services, under the supervision of certain licensed health care providers.

With certain exceptions, a physician assistant (see [Business and Professions Code \(BPC\) section 3502](#)) may generally perform any medical or diagnostic procedure within their competency, subject to the conditions of a practice agreement with their supervising physician.

Under the Radiologic Technology Act, the [Radiologic Health Branch](#) within the California Department of Public Health certifies or permits physicians, chiropractors, podiatrists, technologists, technicians and PAs who use radiologic machines on human beings, and administers exams to physicians, technologists, PAs and technicians radiological machine certification & permitting.

According to the American Registry of Radiological Technologists, a registered RA should be qualified to perform a [core set of clinical activities](#) (see pp. 3-7) at entry into the profession.

The Oklahoma State Board of Medical Licensure and Supervision [adopted rules](#) that regulate the practice of Radiologist Assistants in that state. That state defines an RA as an advanced-level certified radiologic technologist, licensed by the Board, who works under the direct supervision of a radiologist to enhance patient care by assisting the radiologist in the diagnostic imaging environment.

## ANALYSIS

According to the author:

“AB 3097 builds off the Legislature’s previous work to ensure patient safety and uphold the dignity of work in healthcare settings. This bill codifies protections to safeguard the Radiologist Assistant (RA) position, and builds out a framework to ensure the longevity of this role in the years to come.”

## Proposed Definition of RA

AB 3097 includes the following findings and declarations:

- The radiologist assistant is an advanced-level radiographer who has completed a nationally recognized radiologist assistant educational program and successfully completed a nationally recognized certification examination for radiologist assistants.
- Radiologist assistants are an extension of a radiologist and work under the supervision of a radiologist, as part of a radiologist-led team, performing medical imaging procedures within the scope of practice that the radiologist assistant is educationally prepared, clinically competent, and delegated by a radiologist to perform.
- Radiologist assistants do not hold the responsibility of diagnosing illnesses; however, radiologist assistants assist a radiologist by completing patient history, describing procedures, performing medical imaging procedures, and communicating initial clinical and imaging observations or procedure details only to the supervising radiologist for the radiologist’s use.
- Radiologist assistants work in hospitals, outpatient facilities, or diagnostic imaging centers. Radiologist assistants work only under the supervision and delegation of a radiologist.

Under the bill, no one may hold themselves out to be a RA, or use the title of “radiologist assistant,” or any other term, to imply or to suggest that the person is a RA, unless the person meets all the following requirements:

- The person has passed the RA examination administered by the American Registry of Radiologic Technologists, the radiology practitioner assistant examination administered by the Certification Board for Radiology Practitioner Assistants, or another examination offered by a successor or comparable entity that has been determined by the California Department of Public Health to

evaluate the knowledge and skills necessary to ensure the protection of the public and has been approved by the department.

- The person maintains current registration with the American Registry of Radiologic Technologists, the Certification Board for Radiology Practitioner Assistants, or a successor or comparable entity.
- The person is certified or permitted to conduct radiologic technology in this state or possesses a RA license from another state that licenses radiologist assistants.

Scope of Practice

A RA shall not interpret images, make diagnoses, or prescribe medications or therapies. A RA may administer prescribed drugs as directed by the supervising radiologist or radiologist designee. A RA may communicate and document initial clinical and imaging observations or procedure details only to the radiologist for the radiologist’s use. A RA may communicate a supervising radiologist’s report to an appropriate health care provider consistent with the American College of Radiology guideline for communicating diagnostic imaging findings.

Supervision Requirements

A RA shall work only under the supervision of a radiologist. A RA shall not function in their capacity as a radiologist assistant independent of a supervising radiologist. A supervising radiologist may delegate to a RA, as the radiologist determines appropriate to the RA’s competence, those tasks or services that a radiologist usually performs and is qualified to perform.

FISCAL: Possible minor investigation and enforcement costs of a radiologist related to inappropriate supervision of an RA.

SUPPORT: California Radiological Society  
 California Society of Radiologic Technologists  
 Gurnick Academy  
 RadNet

OPPOSITION: None identified.

ATTACHMENT: [AB 3097, Chen – Radiological Assistants](#)  
 Version: 4/10/24 – Amended