



June 13, 2011

The Honorable Ed Whitfield
2368 Rayburn HOB
Washington, DC 20515

The Honorable John Barrow
22202 Rayburn HOB
Washington, DC 20515

Dear Congressmen Whitfield and Barrow:

The American College of Cardiology (ACC), the Heart Rhythm Society (HRS), and the Society for Cardiovascular Angiography and Interventions (SCAI) support the goal of your legislation, the “Consistency, Accuracy, Responsibility, and Excellence in Medical Imaging and Radiation Therapy Act of 2011” (H.R. 2104), which is to “to make the provision of technical services for medical imaging examinations and radiation therapy treatments safer, more accurate, and less costly.” We also support the growth of training and credentialing programs for cardiovascular catheterization technicians. We do not believe, however, that the legislation should apply to invasive cardiovascular technicians and allied health professionals in electrophysiology labs who work under the direct supervision of a physician and request that you exempt them from the legislation’s requirements.

The ACC is a more than 39,000 member, non-profit professional medical society and teaching institution whose mission is to advocate for quality cardiovascular care— through education, research promotion, development and application of standards and guidelines—and to influence health care policy. HRS is the international leader in science, education and advocacy for cardiac arrhythmia professionals and patients, and the primary information resource on heart rhythm disorders. We represent over 5,400 specialists in cardiac pacing and electrophysiology. (SCAI) is a professional association representing over 4,000 invasive and interventional cardiologists. SCAI promotes excellence in cardiac catheterization, angiography, and interventional cardiology through physician education and representation, and quality initiatives to enhance patient care.

Unlike most diagnostic radiological procedures, invasive cardiovascular procedures are performed with the technicians under the personal supervision of physicians who have formal training in radiation safety and who are responsible for all aspects of care during the procedures. Medicare requires this level of physician involvement for both invasive cardiovascular and electrophysiology procedures. The physician bears the responsibility for radiation safety. Fifteen percent of interventional cardiology’s Medical Board exams address radiation issues.

We believe that H.R. 2104 places an unnecessary burden on hospitals and allied health personnel involved in cardiovascular catheterization and electrophysiology laboratory procedures. Our organizations recommend that the legislation exempt technologists working under the direct personal

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supervision of a physician, including allied health professionals in invasive cardiovascular catheterization and electrophysiology laboratories.

As introduced, this legislation may prevent many of the technical staff who currently assist in performing invasive catheterization procedures from working in catheterization laboratories and may effectively cripple cardiac catheterization laboratories across the country.

We appreciate the intent of this legislation and our organizations are strongly committed to the provision of high quality diagnostic and therapeutic services. However, we caution against putting in place a new federal regulatory framework for the purpose of “increasing the safety and accuracy of medical imaging examinations” without data or analysis suggesting that quality or medical necessity concerns exist with cardiovascular catheterization and electrophysiology laboratory procedures.

We hope that you will consider our request for further deliberation on this legislation before it is presented for formal consideration by your committee. Please feel free to contact ACC, HRS, or SCAI directly. Thank you.

Sincerely,



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cc:

Sen Mike Enzi

Rep Leonard L. Boswell

Rep Andre Carson

Rep Steve Cohen

Rep Gerald E. "Gerry" Connolly

Rep John J. Duncan, Jr.

Rep Brett Guthrie

Rep Ralph M. Hall

Rep Greg Harper

Rep Martin Heinrich

Rep Eddie Bernice Johnson

Rep Walter B. Jones, Jr.

Rep Dale E. Kildee

Rep Ron Kind

Rep Leonard Lance

Rep Mike McIntyre

Rep Sue Wilkins Myrick

Rep Laura Richardson

Rep Bobby L. Rush