



## Frequently Asked Questions on Fluoroscopy

Any information contained in this document should not be construed as legal advice and is not intended to be a substitute for legal counsel on any subject matter. All individuals who wish to verify legal requirements of license holders should consult the practice act and all relevant regulatory chapters for the practice of Speech-Language Pathology.

### **Can SLPs complete videofluoroscopic swallow studies (modified barium swallow studies) with a radiology technologist alone? (no radiology MD/DO/PA personally available) - NO**

This guidance is specific to South Carolina. If you are completing the procedure in another state you'll need to become familiar with all regulatory guidance on fluoroscopy in that state.

#### **SC DHEC X-ray regulations:**

<https://scdhec.gov/healthcare-quality/x-ray-facilities-radioactive-materials/x-ray-regulations>

PDF format: <https://scdhec.gov/sites/default/files/media/document/R.61-64.pdf>

RHB 1.2 Prohibited Use, **1.2.2:** It shall be unlawful to intentionally apply radiation to human beings except by, or under the direct supervision of, persons licensed to practice the health professions and authorized to use such radiation.

**1.2.9:** It shall be unlawful for a person other than a licensed practitioner of the healing arts as defined by the South Carolina Department of Labor, Licensing, and Regulation to use fluoroscopy when the licensed practitioner of the healing arts is not physically present in the room, except during therapy simulations, maintenance activities, and training courses.

RHB 4.2 General Safety Provisions, **4.2.13.4:** Radiologic technologists performing fluoroscopy as a localizing procedure shall be monitored by the supervising radiologist who is personally and immediately available.

**Radiology technologist, scope of practice:** <https://www.scrqsa.org/page/Scope>

#### **Limited scope document:**

[https://cdn.ymaws.com/www.scrqsa.org/resource/resmgr/Scope\\_of\\_Practice\\_Standards/Limited\\_Scope\\_of\\_Practice\\_Ra.pdf](https://cdn.ymaws.com/www.scrqsa.org/resource/resmgr/Scope_of_Practice_Standards/Limited_Scope_of_Practice_Ra.pdf)

#### **A licensed practitioner must be present for fluoroscopy:**

<https://cdn.ymaws.com/www.scrqsa.org/resource/resmgr/imported/October%2012,%202002%20minutes.pdf>

“The Board received a letter from a Mr. Daniel Gaskell, regarding modified barium swallow studies. Mr. Gaskell stated that his hospital wanted to investigate if, during a modified barium swallow test, only a Speech Language Pathologist and Radiologic Technologist could be present. Current SC Department of Health and Environmental Control (SC DHEC) regulations require that only a licensed practitioner can perform fluoroscopy procedures, which would include the modified barium swallow. A motion was made, seconded and passed to write a letter of support for SC DHEC’s position and regulations to Mr. Gaskell.”