

Date of Hearing: April 22, 2026

ASSEMBLY COMMITTEE ON APPROPRIATIONS

Buffy Wicks, Chair

AB 2256 (Chen) – As Introduced February 19, 2026

Policy Committee: Business and Professions Vote: 19 - 0

Urgency: No State Mandated Local Program: No Reimbursable: No

**SUMMARY:**

This bill prohibits a person from holding themselves out as a radiologist assistant (RA) or using the RA title or any other term to imply or suggest the person is an RA unless the person meets specified requirements.

Specifically, this bill:

- 1) Prohibits a person from claiming to be an RA, or using the title of “radiologist assistant,” or any other term implying or suggesting the person is an RA, unless the person meets all of the following requirements:
  - a) Has passed the RA examination administered by the American Registry of Radiologic Technologists (ARRT), the radiology practitioner assistant examination administered by the Certification Board for Radiology Practitioner Assistants (CBRPA), or another examination offered by an entity that the California Department of Public Health (CDPH) has determined will ensure the protection of the public, as specified.
  - b) Maintains current registration with ARRT, the CBRPA, or a successor or comparable entity.
  - c) Is certified or permitted to conduct radiologic technology in this state or possesses an RA license from another state.
- 2) Requires an RA to work only under the supervision of a radiologist.
- 3) Prohibits an RA from interpreting images, making diagnoses, or prescribing medications or therapies.
- 4) Authorizes an RA to administer prescribed drugs only as directed by a supervising radiologist or their designee, communicate and document initial clinical and imaging observations or procedures only to a radiologist for the radiologist’s use, and communicate a supervising radiologist’s report to an appropriate health care provider, as specified.
- 5) Authorizes a supervising radiologist to delegate to an RA, as the radiologist determines appropriate to the RA’s competence, tasks or services that a radiologist usually performs and is qualified to perform.

- 6) Specifies that the provisions of this bill do not affect any existing duties for a radiologic technologist or any existing requirements for the supervision of a radiologic technologist.
- 7) Provides that a violation of the provisions of this bill is not a misdemeanor.

**FISCAL EFFECT:**

For a similar bill, AB 511 (Chen), of the current legislative session, the California Department of Public Health (CDPH) previously estimated the need for three full-time positions to conduct inspections, ensure compliance, conduct investigations, develop procedures and inspector training materials, work with legal staff, and document enforcement and legal actions, with estimated ongoing costs of \$587,000 per year. CDPH will also need to purchase a vehicle and radiation test equipment, at an additional cost of \$190,000 in the first year of implementation (General Fund).

The Medical Board of California anticipates a minor increase in enforcement workload related to licensed physicians supervising RAs, resulting in minor and absorbable special fund costs.

The Osteopathic Medical Board of California anticipates no costs.

**COMMENTS:**

- 1) **Purpose.** This bill is sponsored by ARRT. According to the author:

[This bill] safeguards the integrity of the “radiologist assistant” (RA) title by explicitly clarifying the criteria necessary to use this designation. This bill establishes clear standards for radiologist assistants in California while maintaining physician oversight and patient safety.

- 2) **Background. RAs.** According to the sponsor, an RA is a medical radiographer who is certified by ARRT as a Registered Radiologist Assistant (RRA) or by CBRPA as a Radiology Practitioner Assistant (RPA) to perform radiology services under the supervision of a radiologist. RAs can perform patient assessment, patient management, and certain imaging procedures, including fluoroscopy, but not image interpretation. In California, RAs are certified as radiologic technologists (RTs) and are required to hold a license as a certified diagnostic RT and an RT fluoroscopy permit.

An RA must obtain a bachelor’s degree for RPA certification and a master's degree for an RRA certification, complete an RA educational program approved by either the ARRT or the CBRPA, pass an examination offered by the relevant organization, and obtain and maintain the certificate. The RA training goes beyond what is required for RTs, preparing RAs to become advanced practice RTs or radiologist extenders.

**RTs.** RTs also work with ionizing radiation and practice in hospitals, clinics, and physician’s offices across many specialties, from prenatal care to orthopedics. RTs’ education, training, and experience requirements are designed to prevent excessive and improper exposure to ionizing radiation. RTs generally obtain a two-year associate's degree in radiologic technology and are then eligible to take the California and national examinations for a diagnostic or therapeutic radiologic technology certificate. Both state and national

examinations are administered by the ARRT. Successful passage of an examination qualifies an RT to X-ray any part of the body. Those who obtain California state certification may also apply for additional certificates, such as the RT Fluoroscopy Permit or the Mammographic Radiologic Technology Certificate, if they meet the requirements. RTs may also become certified in radiation therapy technology through the ARRT.

***Sunrise Review.*** The Assembly Business and Professions Committee analysis applied sunrise review criteria to weigh this bill's potential benefits to the public health, safety, or welfare; whether the bill is the most effective way to correct existing problems; and whether the proposed level of regulation is appropriate. The sunrise analysis did not clearly demonstrate a consumer protection need for this bill.

### 3) **Prior Legislation.**

AB 511 (Chen), of the current legislative session, and AB 3097 (Chen), of the 2023-24 Legislative Session, were substantially similar to this bill and were held on suspense in this committee.

SB 377 (Hertzberg), of the 2021-22 Legislative Session, was substantially similar to this bill. SB 377 was held on the Senate Appropriations Committee suspense file.

At least three other bills between the 2005-06 and 2011-12 legislative sessions sought to address RA certification or title protection, without becoming chaptered.

**Analysis Prepared by:** Allegra Kim / APPR. / (916) 319-2081