

State Advocacy for Imaging Referral by Physical Therapists



An APTA State Advocacy Resource

We have developed these resources to help APTA's state chapters advocate for explicit authority for physical therapists to refer patients for imaging. You will find background on the overall status of physical therapist referral for imaging; links to state laws, rules, and policies in states where imaging referral is expressly permitted; and model legislative language and background studies that you can use when advocating for imaging referral.

Introduction

The statutory authority to refer patients for imaging studies is generally separate from the authority to interpret the findings from those studies. Some states explicitly either grant or deny permission for physical therapists to refer imaging for their patients, through statutes, regulation, or licensure board rules, policies, or opinions. Of the states that explicitly grant permission, some allow physical therapists to order a variety of imaging studies, such as x-ray, MRI, and CT-scan. Other states limit physical therapists to ordering only x-rays.

However, in most states, applicable laws and regulations are silent on the issue.

States That Expressly Allow PT Imaging Referral

As of October 2021, seven states and the District of Columbia expressly permit PTs to refer patients for imaging. Of them, four are via explicit state statutes, and four are via physical therapy licensure board rules, policies, or opinions:

- [Colorado Physical Therapy Board Policy](#)
In Colorado, PTs can order imaging studies, including MRIs, as directed by a Colorado Physical Therapy Licensing Board policy.
- [Utah Radiology Law](#)
The Utah Radiologic Technologist, Radiologic Assistant, and Radiology Practical Technician Licensing Act governs the ability of PTs to order imaging studies in the state. Under the act, radiological technologists, assistants, and technicians are allowed to accept orders from physical therapists for x-rays and MRIs.
- [Wisconsin Physical Therapy Licensure Law](#)
Wisconsin's physical therapy practice act permits PTs to order x-rays. Among other things, detailed regulations require PTs to complete a formal x-ray ordering training program with demonstrated physician involvement, and to communicate and coordinate with the patient's primary care physician or appropriate health care provider when ordering x-rays, with some exceptions.
- [North Dakota Century Code](#)
North Dakota's practice act, revised in 2021, permits PTs to order x-rays.
- [Rhode Island Public Law](#)
Rhode Island law, enacted in 2021, permits PTs to order x-rays. The legislation requires PTs who order imaging report results within seven days of receipt to the patient's primary care physician if they

have one. It also requires managed health plans to provide a utilization report back to the legislature annually starting in 2022. The legislation sunsets after 2023 unless it is reauthorized by the legislature.

- [District of Columbia Board Ruling](#)
In a 2010 letter, the District of Columbia Board of Physical Therapy clarified its ruling that PTs can order diagnostic imaging studies.
- [New Jersey State Board of Physical Therapy Examiners Ruling](#)
In a 2016 public session, the New Jersey Board of Physical Therapy Examiners clarified that it permits PTs to refer a patient for diagnostic testing, such as imaging studies.
- [Maryland Board of Physical Therapy Examiners Ruling](#)
In a 2014 letter, the Maryland Board of Physical Therapy Examiners clarified its ruling that PTs are permitted to order imaging studies, including x-rays, MRIs, and CT scans.

Approaches To Having Your State Expressly Permit Physical Therapists To Refer Patients for Imaging

Your approach to getting a statute, regulation, rule, board policy, or legal opinion on the books in your state that permits PTs to refer for imaging depends on whether or not the state has explicit prohibitions in place, as is the case in most states.

If your state is silent on imaging referral by physical therapists:

- Consider working with your Physical Therapy Board's legal counsel or state's attorney general to issue an opinion in favor of it.
- Ask your Physical Therapy Board to issue a rule, regulation, or board policy.

If your state explicitly prohibits imaging referral by physical therapists:

- New legislation or regulation will likely be needed, depending on where those prohibitions are stated.

In either case, you may seek language that permits referral in general, referral for imaging in general (as in Colorado, North Dakota, and Rhode Island), or permits referral with more detailed specifications (as in Wisconsin, which specifies such requirements as training).

APTA Model Legislation on Imaging Referral

For referral more generally, including imaging, you may want to consider model language that APTA has proposed to the Federation of State Boards of Physical Therapy for their national model practice act. The association collaborated with the APTA Academy of Orthopaedic Physical Therapy's Imaging SIG to develop language that allows for general referral, which could include referrals for imaging:

“Practice of physical therapy” means:

“Referring for other indicated services and tests for consultation with other providers, decision making, and patient management.”

FSBPT prefers not to include a “laundry list” of procedures or interventions in their model practice act, as they consider including them in state board policies or rules a better approach.

APTA Survey of State Imaging Laws, Policies, and Legal Opinions

In 2016, APTA hired an outside firm to review 25 state laws, regulations, rules, and legal opinions regarding imaging referral by physical therapists (click on the state to see a brief summary and analysis):

Alabama	Hawaii	Louisiana	Montana	Texas
Alaska	Idaho	Maine	Nebraska	Utah
Arizona	Illinois	Maryland	North Dakota	Vermont
Florida	Iowa	Massachusetts	Oregon	Washington
Georgia	Kentucky	Minnesota	South Dakota	West Virginia

The full listing is available on the [APTA Academy of Orthopaedic Physical Therapy's Imaging SIG website](#). This legal research was conducted between 2016 and 2019 so there is a chance that the analysis done for your state could be dated. Note that in most states the analysis did not find explicit authority for physical therapists to refer for imaging or conversely explicit prohibitions.

If you want information about the imaging referral landscape in a state not listed above, reach out to the APTA State Affairs team.

Advocacy Resources

- [“Diagnostic and Procedural Imaging in Physical Therapist Practice”](#) — White Paper Published by APTA Academy of Orthopaedic Physical Therapy.
- [Diagnostic Imaging in Physical Therapist Practice: A Survey of Jurisdiction Priorities and Strategic Plans](#) — poster presentation from members of the University of Kentucky Department of Physical Therapy.
- [APTA State Affairs Imaging Referral — Zoom webinar](#) (use passcode: J=HZ8!mY) and [accompanying slide presentation](#).
- [Experiences of the First Four: Achieving Imaging Referral Privileges](#) — webinar from the Academy of Orthopaedic Physical Therapy Imaging SIG.
- [“The Image is Clear: If you need a diagnostic image a Physical Therapist can order that”](#) — infographic from the Academy of Orthopaedic Physical Therapy Imaging SIG.
- [“Advancing Best Practices: Physical Therapy & Diagnostic Imaging”](#)
- [“Referral for Imaging in Physical Therapist Practice: Key Recommendations for Successful Implementation”](#) — PTJ: Physical Therapy and Rehabilitation Journal, Jan. 29, 2021.

Contacts

APTA State Affairs: Ready to advocate in your state for explicit authority permitting PTs to refer patients for imaging? APTA State Affairs staff can give you grassroots advocacy tools tailored to your state, including legislative action alerts, customized talking points, assistance with messaging, and more. Contact [Daniel Markels](#) or [Michael Lewis](#).

Academy of Orthopaedic Physical Therapy Imaging SIG: Leaders of the [Imaging SIG of the APTA Academy of Orthopaedic Physical Therapy](#) have extensive subject matter expertise on the role of imaging in physical therapist practice.

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