

# State Medical Board of Ohio

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April 18, 2008

Betsy Houchen, JD, MS, RN  
Executive Director  
Ohio Board of Nursing  
17 South High Street, Suite 400  
Columbus, OH 43215-7410

Dear Ms. Houchen:

This letter is in response to your request for the opinion of the State Medical Board of Ohio as to whether the limited interpretation of a chest x-ray for purposes of verifying the placement of a peripherally inserted central catheter [PICC] is exclusive to the practice of medicine and surgery, osteopathic medicine and surgery, or podiatric medicine and surgery. You explain that PICC insertion is part of the specialized registered nurse [RN] practice, and there is a growing national trend for the RN who inserts the PICC to also verify placement of the PICC tip by interpreting the patient's chest x-ray prior to the radiologist's interpretation. You state that the Ohio Board of Nursing has been asked to opine on whether the verification of PICC tip placement is within the scope of practice of the RN in Ohio, and seek the Medical Board's opinion because Section 4723.01(B), Ohio Revised Code, prohibits nurses from engaging in the practice of medicine and surgery or any of its branches.

The Medical Board appreciates the willingness of the Board of Nursing to seek an opinion on this matter and the cooperation of the Board of Nursing staff in providing additional information to the Medical Board staff. The additional information provided includes that RNs have been inserting PICCs for approximately 15 years upon receipt of advanced training, with national certification in IV Infusion Therapy possible. The Board of Nursing staff also provided policy statements and other documents from some other state nursing boards relative to whether RNs in other states are authorized to interpret x-rays to verify placement of the PICC tip. The information provided as to other states indicates that RNs are authorized to provide preliminary interpretations of x-rays to verify placement of the PICC tip in some states, often with the stipulation that radiologist interpret the x-ray within 24 hours.

The Medical Board's Scope of Practice has carefully considered the question before it. At its April 9, 2008 meeting, the Medical Board approved the following response by the Scope of Practice Committee:

Section 4731.34, Ohio Revised Code, defines the practice of medicine and surgery, osteopathic medicine and surgery, and podiatric medicine and surgery in pertinent part as follows:

- (A) A person shall be regarded as practicing medicine and surgery, osteopathic medicine and surgery, or podiatric medicine and surgery, within the meaning of this chapter, who does any of the following:

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(3) \*\*\*

- (a) Examines or diagnoses for compensation of any kind, direct or indirect; \*\*\*

A PICC is a catheter inserted via peripheral vein with the tip located in the vena cava as a delivery mechanism for infusion therapy. Once the PICC tip is inserted, confirmation that the tip is located in the vena cava is essential to ensure that the medicine is properly received by the body. A common means of confirming the location of the PICC tip is by x-ray.

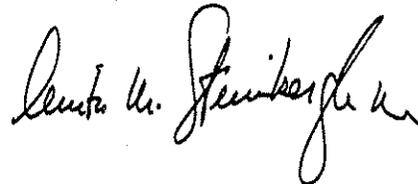
While the interpretation of an x-ray is traditionally thought of as a step in diagnosis, the interpretation of an x-ray to determine the placement of an object inside the body is a form of medical examination leading to diagnosis. Medical examination includes evaluation of the body using a variety of techniques such as visual inspection. Just as the interpretation of an x-ray taken to identify a foreign body lodged in a patient's body is a visual inspection of the inside of the body, the interpretation of an x-ray taken for the purpose of determining the location of the PICC tip is a visual inspection of the inside of the body to determine the location of a deliberately inserted foreign body. The purpose of the visual inspection is to determine whether the tip of the PICC, the mechanism of delivery for the prescribed infusion therapy, is located in the vena cava in order to allow safe, effective delivery of the therapy.

It is noted that a few states allow RNs to interpret an x-ray for the limited purpose of verifying the placement of the PICC tip. However, most of those states recognize that interpreting an x-ray is the practice of medicine because they also require that a radiologist read the x-ray within twenty-four hours. While the purpose of allowing RNs to start infusion upon their own readings may be to allow the start of therapy sooner, the official reading by the radiologist comes too late to avoid possible harm that may result from infusion via an improperly placed PICC tip.

Accordingly, it is the opinion of the State Medical Board of Ohio that the limited interpretation of an x-ray for the purpose of verifying the placement of the PICC tip prior to the initiation of infusion therapy is the practice of medicine. As the practice of medicine, the interpretation must be performed by a physician licensed pursuant to Chapter 4731 of the Ohio Revised Code.

Thank you for the cooperation of the Ohio Board of Nursing in the resolution of this matter. Please contact Sallie Debolt, Executive Staff Attorney, at (614) 644-7021, should you have questions regarding this response.

Sincerely,



Anita M. Steinbergh, D.O.  
Chair  
Scope of practice Committee