



QUALITY IS OUR IMAGE

acr.org

April 10, 2023

RE: Senate Project 1134

Dear Distinguished Member,

On behalf of The Radiological Society of Puerto Rico (SOCRAD) and the American College of Radiology (ACR), we appreciate the opportunity to comment and oppose Senate Project 1134. The SOCRAD is a professional organization whose mission is to advance the science of radiology, improve radiological services, and maintain high levels of medical and ethical standards in the practice of radiology, throughout the Commonwealth of Puerto Rico. ACR is a professional organization representing more than 41,000 radiologists, radiation oncologists, interventional radiologists, nuclear medicine physicians, and medical physicists. Senate Project 1134 would grant the title of specialty and subspecialty to general practitioners who lack the necessary knowledge and skills to perform these complex and highly technical procedures.

*A) Any general practitioner who has worked for at least the last ten (10) uninterrupted years full-time in an emergency room and who presents evidence of said practice to the satisfaction of the Board, may be granted certification as a medical specialist.*

The SOCRAD and ACR greatly appreciate the contributions and roles that general practitioners make to the entire healthcare system. However, we do not believe that their education and training prepare them to treat patients in Puerto Rico who require specific medical specialties and sub-specialty procedures.

For example, a physician specializing in radiology must complete at least 13 years of training, including medical school, a four-year residency, and most often, an additional one- or two-year fellowship of very specialized training, such as radiation oncology, pediatric radiology, breast imaging, or interventional radiology. They are certified by the American Board of Radiology, and they have exacting requirements for continuing medical education throughout their practicing years. Patients expect the most qualified person—physician experts with unmatched training, education, and experience—to lead and oversee care.

As provisions of healthcare become more complex, a fully coordinated, quality-focused, and patient-centered model of care is what all Puerto Ricans deserve. The SOCRAD and the ACR are committed to helping all members of the health care team work together in a coordinated, efficient manner to achieve the triple aim in health care: ensure that our patients receive the highest quality of health care, at the lowest cost, resulting in the most optimal clinical outcomes.

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Thank you for your consideration of this very important issue. Should you have any questions, please feel free to contact Eugenia Brandt or Dillon Harp in ACR's Government Relations office at [ebrandt@acr.org](mailto:ebrandt@acr.org) or [dharp@acr.org](mailto:dharp@acr.org) or Alvin A. Almodóvar, SOCRAD president at [Dr.Alvinstein@gmail.com](mailto:Dr.Alvinstein@gmail.com).

Sincerely,



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