



State of California—Health and Human Services Agency
Department of Health Services



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Governor

INFORMATION NOTICE

TO: Users and operators of CT/PET Imaging Devices

SUBJECT: Operator Certification Requirements and Assembly Bill 2720

This notice is to inform the radiologic and nuclear medicine technology community about Assembly Bill (AB) 2720 (Statutes of 2006, chapter 220) that took effect on January 1, 2007. AB 2720 addresses requirements for operators of Computerized Tomography/Positron Emission Tomography (CT/PET) equipment. A copy of AB 2720 is available at <http://leginfo.legislature.ca.gov/faces/billSearchClient.xhtml>: enter "220" for the Chapter Number and "2006" for the Chapter Year.

AB 2720 authorizes:

- Certified radiologic technologists (CRTs) to perform a PET scan only on a dual mode machine on which both a PET scan and a CT scan can be performed, if the CRT:
 - Holds a current, valid certificate in PET issued by the Nuclear Medicine Technology Certification Board (NMTCB), or a similarly recognized organization, or complies with the regulations issued by the Department governing students of nuclear medicine technology in order to obtain a current, valid certificate in PET issued by the NMTCB; and
 - Is under the supervision of a person who is an authorized user identified on a specific license authorizing medical use of radioactive materials (RAM) pursuant to the Radiation Control Law (RCL).
- Certified technologists, nuclear medicine (CTNM) to perform a CT scan only on a dual mode machine on which both a PET scan and a CT scan can be performed if the CTNM:
 - Holds a current, valid certificate in computerized tomography issued by the American Registry of Radiologic Technologists (ARRT), or a similarly recognized organization, or is a student described in Section 106975(b) of the Health and Safety Code; and
 - Is under the supervision of a person who is an authorized user identified on a specific license authorizing medical use of RAM pursuant to the RCL.

Please note that the CTNM must, at a minimum, possess the imaging scope specified in title 17, California Code of Regulations, section 30533(a)(2) to perform nuclear medicine procedures involving imaging.

The Radiologic Health Branch (RHB), in the year 2000, issued Radiation Safety Advisory 00-1 (RSA 00-1) stating that when CT/PET equipment was operated in the dual mode, the CTNM was the authorized operator and had to be under supervision of an authorized user indicated on a radioactive material (RAM) specific license authorizing medical use of RAM. Due to the adoption of AB 2720, RSA 00-1 was rescinded effective December 31, 2007. Therefore, when CT/PET equipment is operated in the dual mode the operator must be either a(n):

- Individual who is dually certified as a CRT and a CTNM;
- CRT possessing the NMTCB's PET certificate or is a student pursuant to regulations; or
- CTNM possessing the ARRT's CT certificate or is a student pursuant to regulations.

AB 2720 expanded the scope of practice of CRTs and CTNMs provided specific criteria are met. The attached table provides a summary of this expansion. However, to expand your respective scope of practice and obtain the desired certificate from either the ARRT or the NMTCB, you must meet those organization's requirements AND be in compliance with existing State laws and regulations addressing radiologic technology and nuclear medicine.

To obtain the NMTCB's PET certificate, contact that organization at www.nmtcb.org. NMTCB requires individuals to complete 45 hours of didactic education and 700 hours of clinical experience and pass an examination. To complete the clinical experience requirements you can obtain that experience:

- Outside of the Department's legal jurisdiction such as in a federal facility; or
- Inside the Department's legal jurisdiction as a student of nuclear medicine technology as defined in title 17, California Code of Regulations, section 30540.

To obtain the ARRT's CT certificate, contact that organization at www.arrt.org. ARRT requires individuals to complete clinical experience by performing a certain number of CT procedures and pass an examination. Those procedures can be performed:

- Outside of the Department's legal jurisdiction such as in a federal facility; or
- Inside the Department's legal jurisdiction as a student of radiologic technology as defined in Health and Safety Code section 114850(j) in a Department-approved school of diagnostic radiologic technology (RT).

RHB will not establish "CT schools" or require current schools to expand their curricula. However, RHB encourages all approved diagnostic RT schools to establish training modules for individuals to legally obtain the clinical experience needed to apply for certification by ARRT.

RHB will continue to evaluate compliance with all applicable radiation laws, including AB 2720, and regulations during inspection.

The following table identifies the required certification for performing the indicated procedure.

Abbreviations:

- SPECT = Single Photon Emission Computed Tomography
- PET = Positron Emission Tomography
- CT = Computed Tomography
- NMTCB = Nuclear Medicine Technology Certification Board
- ARRT = American Registry of Radiologic Technologists
- RSA = Radiation Safety Advisory (issued by RHB)

| CT, PET, SPECT, CT/PET or CT/SPECT procedure. | Certification required. |
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| CT Scan (single mode machine) | CRT ¹ or student in an RHB-approved RT School per Health and Safety Code §106975(b). |
| PET Scan (single mode machine) | CTNM ² or student per 17 CCR 30540. |
| CT Scan (dual mode machine) | 1. CRT (supervision by S&O holder), or 2. CTNM with ARRT CT certificate (Performance by the CTNM must be under supervision of an authorized user specified on a radioactive material (RAM) medical license.) or 3. A student in an RHB-approved RT School per Health and Safety Code §106975(b). This student can be a CTNM. |
| PET Scan (dual mode machine) | 1. CTNM, or 2. CRT with NMTCB PET certificate, or 3. A student per 17 CCR 30540. Performance must be under supervision of an authorized user specified on a RAM medical license. |
| CT, PET, SPECT, CT/PET or CT/SPECT procedure. | Certification required. |

¹ CRT means a person certified as a diagnostic radiologic technologist pursuant to Health and Safety Code §114870(b).

² CTNM means a "Certified technologist, nuclear medicine" who is a person who holds a current certificate in nuclear medicine technology issued pursuant to title 17, California Code of Regulations, §30532. (17 CCR 30532.) The CTNM must at a minimum hold a certificate in the imaging scope specified in 17 CCR 30533(a)(2).

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| CT/PET scan (dual mode machine) | <ol style="list-style-type: none">1. CTNM with ARRT CT certificate,2. CRT with NMTCB PET certificate, or3. A Student in both an approved RT school AND NMT program (e.g. an individual enrolled simultaneously in an RT school and an NMT program). <p>Performance by either CRT or CTNM may only be under supervision of an authorized user specified on a RAM medical license.</p> <p>RSA-00-1 rescinded effective December 31, 2007.</p> |
| SPECT (single mode machine) | <ol style="list-style-type: none">1. CTNM, or2. A student per 17 CCR 30540. <p>Performance may only be under supervision of an authorized user specified on a RAM medical license.</p> |
| CT/SPECT (dual mode machine) | <ol style="list-style-type: none">1. CTNM with ARRT CT certificate (Performance may only be under supervision of an authorized user specified on a RAM medical license), or2. A Student in both an approved RT school AND NMT program (e.g. an individual enrolled simultaneously in an RT school and an NMT program). Supervisor of student must be authorized user specified on a RAM medical license who also possesses either an X-ray “Radiology Supervisor and Operator Certificate” or “Radiography Supervisor and Operator Permit.” <p>(NOTE: CRTs are not authorized for SPECT in any capacity unless dually certified as a CTNM.)</p> |