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

MARK B HORTON, MD, MSPH
Director

ARNOLD SCHWARZENEGGER
Governor

INFORMATION NOTICE (IN)
Clarification of June 18, 2007 IN

September 4, 2007

TO: **Users and operators of CT/PET and CT/SPECT Imaging Devices**

Subject: **Clarification of CT/PET and CT/SPECT Operator Requirements**

This notice is to provide clarification regarding the June 18, 2007 Information Notice. Specifically, a Certified Technologist, Nuclear Medicine (CTNM), who operates a CT/PET or CT/SPECT machine to perform PET or SPECT scans, respectively, is not required to be certified in Radiologic Technology if the machine, during the scan, uses X-rays only for attenuation correction and not for diagnostic CT imaging.

The application of X-rays for attenuation correction during a PET or SPECT scan is not considered a diagnostic application of X-rays, and is therefore not subject to the Health and Safety Code as explained below. However, if the application of X-rays during a PET or SPECT scan is used for diagnostic purposes (i.e. a diagnostic CT and a PET or SPECT procedure is performed), then the operator must be one of the following:

- A dually certified diagnostic radiologic technologist and nuclear medicine technologist in the scope specified in 17 CCR 30533(a)(2);
- A CTNM with the ARRT CT certificate;
- A CRT with the NMTCB PET certificate for PET, not SPECT because CRTs are not authorized for SPECT in any capacity unless dually certified as a CTNM; or
- A student as indicated in the June 18, 2007 Information Notice.

This determination is based on Health and Safety Code sections 106965(a) and 114850(c). Section 106965(a) makes it unlawful for any person to use diagnostic X-rays on human beings unless they are certified by this Department in Radiologic Technology. Section 114850(c) defines Radiologic Technology to mean the application of X-rays on human beings for diagnostic or therapeutic purposes.

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