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CLINICAL SUPERVISION/OVERSIGHT ADVISORY

TO: All Limited Permit X-ray Schools

SUBJECT: Supervision/Oversight at approved Clinical Affiliation Sites

On January 14, 2010, the California Department of Public Health, Radiologic Health Branch (RHB), sent a letter to all Limited Permit X-ray Technician Schools, advising the schools that pursuant to California Health & Safety Code (HSC), section 106975(b), limited permit X-ray technicians are not authorized to provide supervision for student training at approved clinical affiliation sites (CAS).

The purpose of this notice is to provide clarification regarding required supervision/oversight of the limited permit X-ray technician students at clinical affiliation sites.

I. SUPERVISING LICENTIATE

Each clinical affiliation site (CAS) shall designate in writing a supervising licentiate who possesses either a:

- Radiology supervisor and operator certificate; or a
- Radiography supervisor and operator permit.

The supervising licentiate shall be:

- Responsible for supervision of the student and for the acts and omissions of both the student and any other individual providing direct or indirect oversight to students; and
- Available within the facility for consultation by both students and other individuals providing direct or indirect oversight to students.

II. STUDENTS

Students, when operating X-ray equipment:

- Shall be under direct oversight until the supervising licentiate has determined that the student has achieved competency for the particular procedure.

- Once the student has achieved competency for a particular procedure, the student may then perform that procedure under indirect oversight.
- The competency determination shall be written, dated, name printed and signed by both the person providing direct oversight and the supervising licensee. If both of those individuals are the same person, one signature is sufficient.
- However, students who have achieved competency shall continue to be under direct oversight during performance of a repeat of any unsatisfactory radiograph or image.

III. School

The school shall maintain records of competency determinations and documentation of personnel qualifications and make the same available for department inspection.

IV. Definitions

- “Supervision” means responsibility for, and control of, quality, radiation safety, and technical aspects of all X-ray examinations and procedures.
- “Direct oversight” means the oversight of operations by a qualified person who is physically present to observe, and correct, as needed, the performance of the student who is performing the procedure.
- “Indirect oversight” means the oversight of operations by a qualified person who is physically present and available within the facility where the student is performing the procedure.
- “Qualified person” means either a:
 - Certified supervisor and operator possessing either a radiology supervisor and operator certificate or radiography supervisor and operator permit; or
 - Certified diagnostic radiologic technologist who has at least two years of radiologic technology experience; or
 - Limited permit X-ray technician who holds a limited permit in the permit category for which the student is training and has at least two years of radiologic technology experience.

V. Limitations

A limited permit X-ray technician (XT) may only act as a qualified person for students within the limitations of the permit category held by the XT and as restricted pursuant to the California Code of Regulations, title 17, section 30447.

As stated in the January 14, 2010, letter, all CAS requests received after May 1, 2010, must be in compliance with HSC, section 106975(b), or approval will not be granted. CAS requests which have been approved prior to May 1, 2010, must be brought into compliance by May 1, 2011.