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To: Approved California Radiologic Technologist (RT) Schools

Subject: Use of Federal Facilities for Clinical Training Sites

On August 10, 2007, the California Department of Public Health met with representatives from a number of California Radiologic Technology schools to clarify the Department's June 8, 2007, letter regarding use of U. S. Department of Veterans Affairs facilities for clinical training. This is the August 11, 2007, update to the Department's policy concerning federal facilities service as clinical training sites for approved California Radiologic Technology schools as transmitted via email from Kevin Reilly, DVM, MPVM, Deputy Director, Center for Environmental Health, California Department of Public Health.

When a California Radiologic Technology (RT) school intends to engage or sign an affiliation agreement with a clinical site in order for RT students to meet training requirements, the clinical site that signs the affiliate agreement must meet all the requirements of the California Health and Safety (H & S) Code as well as California Code of Regulations (CCR), title 17, including the requirement for personnel certification, machine registration, and onsite inspections. Such inspections may be conducted by the Radiologic Health Branch for any clinical site to ensure compliance.

The California RT Schools, as well as all of their clinical affiliates, must meet the standards set forth in the H & S Code and CCR, title 17, including:

- X-ray machines shall be registered with the California Department of Public Health (CDPH).
- Each Licentiate providing supervision of the student(s) shall have Supervision & Operator permits or certificates issued by CDPH.
- Each radiologic technologist providing supervision of the student(s) shall have certificates issued by CDPH.

Health and Safety Code provisions exempt personnel and machines employed by an agency of the federal government while performing the duties of employment. However, state law regarding radiologic technology schools requires that machines and personnel used in education and training of students must be in compliance with state requirements personnel certification and machine registration.

In order for a CDPH-approved California RT School to utilize a federal government facility as a clinical training affiliate, that affiliate must voluntarily agree to (1) register with CDPH machines used in student training (US FDA installation certification (report of assembly) does not meet this requirement), (2) allow CDPH access to clinical training affiliate sites for unannounced inspections to document compliance with state laws, (3) have Supervisor & Operator permits or certificates issued by CDPH for each licensee providing supervision of the student(s), and (4) have appropriate certificates or permits issued by CDPH for each radiologic technologist providing supervision of the student(s). Registration and certification application forms are attached below.

Machine registration fees will be waived by CDPH for machines used in training students in federal government clinical training affiliates. Personnel permit or certification fees cannot be waived and are required for Personnel permitting or certification.

Students currently enrolled in California RT School programs will be allowed to continue their training at federal government clinical training affiliates sites upon certification by the school to CDPH that the clinical site(s) meet the above standards. Certification by the school must be submitted to RHB not later than January 1, 2008. Complete compliance will be evaluated for continued approval at the renewal of the school's approval. California RT Schools continue to be responsible for confirming that machines and personnel used in education and training of students in clinical training affiliates be in compliance with state requirements for personnel certification and machine registration.

In addition to discussion on federal facilities participating in clinical training, Radiologic Technology School representatives had questions regarding CDPH's review of school curriculum as part of the California Radiologic Technology School approval process. CDPH has recently prioritized review of school curricula as part of school approval renewals. In recognition of the Radiologic Technology Certification Committee recently establishing a subcommittee to advise on current school regulatory requirements including curriculum, and a second subcommittee to advise on CDPH delegation of school approval processes to third party accreditation organizations, CDPH is planning on extending school curriculum reviews over the next 6-12 months. As CDPH's review continues, it is of critical importance that schools respond in a timely fashion to CDPH requests for information or clarification of school curriculum vis-à-vis existing regulatory requirements. The school approval process documenting school's compliance with statutory and regulatory requirements will proceed. The comprehensive curriculum review process will proceed as a separate process in parallel with the school reviews.

If you have any questions, please call Ms. Frieda Taylor, at (916) 650-6702.