

INFORMATION NOTICE

SUBJECT: Operator Certification Requirements for use of Computed Tomography/Positron Emission Tomography (CT/PET) Imaging Devices.

This notice is to inform the radiologic and nuclear medicine technology communities of the certification requirements for operators of CT/PET imaging devices.

When CT/PET equipment is operated in the dual mode, the operator must be either a(n):

- Individual who is dually certified as a diagnostic Certified Radiologic Technologist (CRT) and a Certified Technologist, Nuclear Medicine (CTNM).
- CRT:
 - Possessing the Nuclear Medicine Technology Certification Board (NMTCB) PET certificate.
 - Is a student of nuclear medicine technology (Title 17, California Code of Regulations section 30509 ([17 CCR 30509](#))) pursuant to [17 CCR 30540](#); or
 - Is registered pursuant to Health and Safety Code (HSC) section 107115.
- CTNM:
 - Possessing the American Registry of Radiologic Technologists (ARRT) CT or the NMTCB CT certificate.
 - Is a student in an RHB-approved diagnostic radiologic technology (RT) school per [17 CCR 30412](#); or
 - Is registered pursuant to [HSC 107115](#).

Please note that the CTNM must, at a minimum, possess the imaging scope specified in [17 CCR 30533\(a\)\(2\)](#) to perform nuclear medicine procedures involving imaging.

Note: A CTNM, who operates a CT/PET or CT/SPECT¹ 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. This determination is based on HSC 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.

¹ SPECT = Single Photon Emission Computed Tomography

ARRT and NMTCB 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 in an approved diagnostic RT certification school in accordance with 17 CCR 30412; or
 - As registered pursuant to HSC 107115.

The NMTCB can be contacted at www.nmtcb.org the ARRT at www.rrt.org.

HSC 107115 allows a CRT or CTNM to complete necessary procedures under on-the-job training within the Department’s legal jurisdiction through a registration process. To start this registration process, please send an inquiry email to CDPHRHBSchools@cdph.ca.gov. The person registered pursuant to HSC 107115 can use single/stand-alone CT or PET equipment during their registered period for meeting the ARRT/NMTCB performance requirements.

The Radiologic Health Branch evaluates compliance with all applicable radiation laws and regulations during inspection.

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

CT, PET, SPECT, CT/PET, or CT/SPECT procedure.	Certification required.
CT scan (single mode machine)	1. CRT ² , 2. Student in an RHB-approved diagnostic RT certification school per 17 CCR 30412 , or 3. CTNM registered pursuant to HSC 107115 .
PET Scan (single mode machine)	1. CTNM ³ , 2. Student per 17 CCR 30540 , or 3. CRT registered pursuant to HSC 107115 .
PET Scan (dual mode machine)	1. CTNM, 2. CRT with NMTCB PET certificate, 3. Student per 17 CCR 30540 , or 4. CRT registered pursuant to HSC 107115 . *Performance must be under supervision of an authorized user specified on a RAM medical license.

² CRT means a person certified as a diagnostic radiologic technologist pursuant to [Health and Safety Code §114870\(b\)](#).

³ 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 30500](#).) The CTNM must at a minimum hold a certificate in the imaging scope specified in [17 CCR 30533\(a\)\(2\)](#).

CT, PET, SPECT, CT/PET, or CT/SPECT procedure.	Certification required.
CT/PET scan (dual mode machine)	<p>1. CTNM with ARRT CT or NMTCB CT certificate, 2. CRT with NMTCB PET certificate, 3. 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), or 4. CTNM registered pursuant to HSC 107115.</p> <p>*Performance by either CRT or CTNM may only be under supervision of an authorized user specified on a radioactive materials (RAM) license authorizing medical use.</p>
SPECT (single mode machine)	<p>1. CTNM, or 2. A student per 17 CCR 30540.</p> <p>*Performance may only be under supervision of an authorized user specified on a RAM medical license.</p>
CT/SPECT (dual mode machine)	<p>1. CTNM with ARRT CT or NMTCB CT certificate (Performance may only be under supervision of an authorized user specified on a RAM medical license), or</p> <p>2. 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> <p>(NOTE: CRTs are not authorized for SPECT in any capacity unless dually certified as a CTNM.)</p>
CT/SPECT (dual mode machine)	<p>1. CTNM with ARRT CT or NMTCB CT certificate (Performance may only be under supervision of an authorized user specified on a RAM medical license), or</p> <p>2. 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> <p>(NOTE: CRTs are not authorized for SPECT in any capacity unless dually certified as a CTNM.)</p>