

SUPPLEMENTAL STATEMENT OF REASONS

The California Department of Public Health (Department) has instituted additional changes to these proposed regulations which are discussed below. These changes are initiated by the Department.

Section 30305(e)(1) & (e)(2)(A): The text is revised to prevent interpretation that an individual must, or will always, have both a certificate AND a permit. An individual may have a combination of authorizations, described below. It is intended that the user post all required authorizations held by each individual, or provide a list with specific information. When providing a list, the certificate or permit number is entered in the Department's website search tool at <http://rhubxray.cdph.ca.gov/> displaying all authorizations held by that individual.

Under the RT Act, individuals are categorized as either licentiates of the healing arts ("Licentiates") (17 CCR 30400(a)(25)) or non-licentiates (i.e. certified radiologic technologists (CRT) (17 CCR 30400(a)(9)), and limited permit X-ray technicians (XT) (17 CCR 30400(a)(27))). The overall current structure of certification and permitting of individuals under the RT Act is as follows:

1. Certificates & Permits issued to non-licentiates:
 - CRTs can obtain up to three certificates and one permit:
 - Certificates in:
 - Diagnostic radiologic technology (17 CCR 30440)
 - Therapeutic radiologic technology (17 CCR 30440)
 - Mammographic radiologic technology (17 CCR 30455.1)
 - Must also possess certificate in diagnostic radiologic technology.
 - Permit:
 - Radiologic technologist fluoroscopy permit (17 CCR 30451)
 - Must also possess certificate in diagnostic radiologic technology.
 - XTs only receive permits and can hold any combination of the follow eight categories (17 CCR 30442 & 30443):
 - Chest; Dental X-ray laboratory; Dermatology X-ray therapy; Extremities; Leg-podiatric; Skull; X-ray bone densitometry; and Torso-skeletal radiography.
2. Certificate & Permits issued to licentiates (17 CCR 30466)
 - Radiology supervisor and operator (S&O) certificate: Issued only to radiologists and radiation oncologists. (17 CCR 30462.) A certificate grants X-ray use without limitation so these licentiates will only hold one certificate.
 - Non-Radiologist, Non-radiation oncologist physicians will generally hold either one or both of the following:
 - Fluoroscopy S&O permit.
 - Radiography S&O permit.

- Dermatology S&O permit: Very limited permit issued to practicing dermatologists performing radiation therapy of skin lesions.
- X-ray bone densitometry S&O permit: Very limited permit (17 CCR 30461(e)) and is not be required if the licentiate already holds either the certificate or the radiography permit.

Section 30305(e)(1) was amended to remove unnecessary references to the Radiologic Technology Act and the Health and Safety Code Section 27. The regulations that implement, interpret, and make specific the provisions of the RT Act are in Title 17, California Code of Regulations, commencing with section 30400, which is already referenced. This change has no regulatory effect.

Section 30305(e)(2)(A) was amended to add a comma between listed items. This change has no regulatory effect.

Section 30305(e)(2)(B) was amended to remove the phrase, “list shall contain the” as it was duplicative and unnecessary. Grammatical correction is made to the quoted statement. These changes have no regulatory effect.