

## Radiology Compliance Branch

### RADIATION PROTECTION SECTION



Division of Health Service Regulation • N.C. Department of Health and Human Services

### FREQUENTLY ASKED QUESTIONS / CT PERSONNEL REQUIREMENTS

#### 10A NCAC 15 .0611; Documentation of Initial Qualifications for Technologists Performing Diagnostic Computed Tomography Exams in North Carolina

Cone beam CT, veterinary CT, CT treatment planning simulation, and CT attenuation correction are **EXEMPT** from Rule .0611. Hence **only those individuals who perform diagnostic CT procedures on humans using dedicated CT scanners must meet training and clinical experience requirements specified in this rule.**

#### **Where can I get more details on what I need to qualify to perform CT in North Carolina?**

Individuals may refer to the following documents:

*Technologists Credentials for Computed Tomography* [CT Guidance Document Pursuant to 10A NCAC 15 .0611](#)

*NC Computed Tomography* [CT Initial Qualification Log](#)

*NC Computed Tomography* [CT Personal Supervision Verifier Form](#)

Other helpful information is available at the American Registry of Radiologic Technologists website at [www.arrt.org](http://www.arrt.org):

CT Structured Education Requirements [ARRT Education](#)

CT Experience Requirements [ARRT Documented Procedures](#)

#### **When did the North Carolina CT rule, including personnel requirements, become effective?**

The effective date of the new CT rule .0611 is October 1, 2017. The regulatory agency, the NC DHHS DHSR Radiation Protection Section Radiology Compliance Branch, is allowing an interim period so that individuals who perform diagnostic CT procedures on dedicated CT scanners can complete the required training and clinical experience to comply with the regulation. **This interim period will expire on January 1, 2019.** That means, **by January 1, 2019, individuals who perform diagnostic CT procedures on dedicated CT scanners must meet the personnel requirements specified in the rule.**

#### **What are the personnel requirements?**

The agency has developed the *Technologists Credentials for Computed Tomography Guidance Document Pursuant to 10A NCAC 15 .0611* [CT Guidance Document](#) that provides details regarding the various ways a technologist may comply with the new rule. It also explains the expectation for documentation that must be made available to representatives of the regulatory agency during facility inspections.

Individuals who perform diagnostic CT on a dedicated CT scanner must be specifically trained in the operation of the scanner(s). Furthermore, these individuals must meet one of the following criteria:

- 1) Hold a valid CT registration with the American Registry of Radiologic Technologists (ARRT); or
- 2) Hold a valid registration with the ARRT in radiography (R) or certification by the Nuclear Medicine Technology Certification Board (NMTCB), complete (and document) structured education pertaining to CT, and complete (and document) clinical experience in performing a variety of diagnostic CT procedures; or
- 3) Be in training under the personal supervision of an individual who meets 1) or 2)

#### **What type of documentation must CT technologists provide their employers to demonstrate their qualifications to perform diagnostic CT on dedicated CT scanners?**

- 1) Those technologists who have completed the advanced CT registry by the ARRT must provide their employer a copy of their registration card or verification document.
- 2) X-ray technologists or nuclear medicine technologists must provide their employer a copy of their registration card or verification document from the ARRT or NMTCB, respectively. In addition, these individuals must provide documentation to demonstrate their structured CT education and clinical experience.

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**What is a Qualifying CT Candidate?**

To explain the credentials required by technologists who perform diagnostic CT on dedicated CT scanners, the regulatory agency has developed the Technologists Credentials for Computed Tomography [CT Guidance Document](#) Pursuant to 10A NCAC 15 .0611.

A Qualifying CT Candidate is a technologist who demonstrates to their employer or the regulatory agency that the candidate is qualified to perform diagnostic CT procedures on dedicated CT scanners.

**What are the Initial CT Qualifications Documentation and their Purpose?**

To explain the credentials required by technologists who perform diagnostic CT scanners on dedicated CT scanners, the agency has developed the Technologists Credentials for Computed Tomography [CT Guidance Document](#) Pursuant to 10A NCAC 15 .0611.

If a technologist holds a valid CT registration by the ARRT, no documentation of initial qualifications is required. However, the rule affords X-ray technologists (with a valid ARRT-registration in Radiology) and nuclear medicine technologists (with a valid certification by the NMTCB) to perform diagnostic CT procedures on dedicated CT scanners provided they have appropriate CT education and clinical experience. These individuals with the valid credential RT(R) or CNMT must have documentation of their initial qualifications. That is, they must have documented 16 hours of structured CT-related education and performance of a minimum of 125 diagnostic CT procedures.

With regard to 16 hours of structured education, technologists must have documentation of the actual courses. Because the structured education must be compatible with the ARRT CT exam requirements, Qualifying CT Candidates should refer to the CT Education Requirement [ARRT Education](#).

To document their clinical experience, technologists should use two forms developed by the agency: the [CT Initial Qualification Log](#) and the [CT Personal Supervision Verifier Form](#). Because the clinical experience must be compatible with the ARRT CT exam requirements, Qualifying CT Candidates should refer to the CT Experience Requirements [ARRT Documented Procedures](#) for specifics on how to select types of procedures.

**These documents (of structured CT-related education and CT clinical experience) are the technologist's Initial CT Qualifications Documentation.** As such, they are a **permanent record** that demonstrates the technologist's qualifications to perform diagnostic CT procedures – including the date the technologist met the qualification requirements specified in Rule .0611.

**What type of documentation must CT Qualifying Candidates provide to their employer(s)?**

As Qualifying CT Candidates, technologists who perform diagnostic CT procedures on dedicated CT scanners must provide to each facility registered with the agency:

- 1) A copy of their valid ARRT-CT registry or verification document; or
- 2) A copy of their valid ARRT-R registry or NMTCB certification along with their Initial Qualifications Documentation\*.

*\* X-ray technologists and nuclear medicine technologists who perform diagnostic CT procedures on dedicated CT scanners are required to maintain permanently their Initial Qualifications Documentation. Furthermore, these technologists must provide the Documentation to the employer at each facility or X-ray registrant where they perform diagnostic CT on dedicated CT scanners. Unless the technologist has a valid ARRT-CT registry, the Initial Qualifications Documentation will be required throughout the technologist's work history.*

**What documentation must a Verifier of CT Personal Supervision provide to the CT Qualifying Candidate?**

Each person who provides supervision of the clinical procedures performed by the CT Qualifying Candidate must already meet the CT training and education requirements of the rule prior to providing such supervision. The Verifier must complete the [CT Personal Supervision Verifier Form](#) for the Candidate.

The CT Qualifying Candidate is responsible for maintaining their [CT Personal Supervision Verifier Form](#) along with their documented clinical procedures using the [CT Initial Qualification Log](#). Again, these two forms (along with the documentation of structured education) serve as the Candidate's Initial Qualifications Documentation that must be available to representatives of the regulatory agency during inspections.

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### **Who is allowed to supervise and verify CT documented clinical procedures in North Carolina?**

Only a technologist with appropriate CT credentials may supervise the procedures completed by an individual in training. That is, the supervisor must meet one of the following criteria:

- 1) Hold a valid CT registration with the American Registry of Radiologic Technologists (ARRT); or
- 2) Hold a valid registration with the ARRT in radiography (R) or certification by the Nuclear Medicine Technology Certification Board (NMTCB), complete (and document) structured education pertaining to CT, and complete (and document) clinical experience in performing a variety of diagnostic CT procedures.

If the Verifier does not already meet one of the aforementioned criteria, the Verifier is not qualified to verify or supervise the performance of the individual in training. The Verifier cannot be a supervisor of procedures until they are qualified to perform diagnostic CT exams on dedicated CT scanners.

### **What is meant by “Personal Supervision?”**

“Personal supervision” means the qualified supervisor must be physically present to provide direction to the individual in training while performing CT exams.

### **If I successfully completed the ARRT advanced registry in CT, what documentation do I need to provide to my employer?**

Those technologists who have completed the advanced CT registry by the ARRT must provide their employer a copy of their registration card or verification document. The card or document must demonstrate that the technologist complies with the regulation by January 1, 2019.

### **What are examples of initial documentation that I can provide to my employer?**

Those technologists who hold the ARRT CT registration should provide the employer a document that demonstrates the CT credential and includes the date. Examples include:

A Qualified CT Candidate Who Passed the ARRT CT Exam prior to January 1, 2019 and Who is Working in North Carolina: You may use the ARRT card; the verification form from the ARRT webpage; or a copy of the ARRT CT Certificate. The date should demonstrate that you earned the ARRT CT credential before January 1, 2019. This document is your **Initial CT Qualifications Documentation**. You should be maintained *permanently* and provide it to each employer throughout your work history in North Carolina.

For example; if you passed the ARRT CT exam in 2017 and have maintained a copy of that 2017 ARRT card; the 2017 ARRT verification form; or the original ARRT CT certificate, any one of these documents will demonstrate that you met the regulatory requirement prior to January 1, 2019.

A Qualified CT Candidate Who Passed ARRT CT Exam after January 1, 2019 – and before Working in North Carolina: It would be the same as previous question. For example; if you passed the ARRT CT exam in April 2019, the 2019 ARRT card; the 2019 ARRT verification form, or ARRT CT certificate are acceptable ways to demonstrate your qualification prior to your hire date at a North Carolina employer. This document is your **Initial CT Qualifications Documentation** and should be maintained permanently so that you may provide it to each employer throughout your North Carolina work history.

A Qualified CT Candidate Who Completes Structured Education and Experience for Initial Qualification: You must maintain the **Initial CT Qualifications Documentation** that confirms your CT structured education and documented CT clinical experience. Furthermore, these documents must demonstrate that you completed the coursework and experience within a twenty four month period. The date you completed the requirements is your date of qualification. You must maintain permanently these records (i.e., your completed coursework, documented procedures, and documented Personal Supervision Verifier form) and provide them to each employer throughout your work history in North Carolina.

**What if a CT Qualifying Candidate applied and qualified for the ARRT CT exam prior to the effective date of the regulation (i.e., October 1, 2017) but has not yet successfully passed the ARRT CT registry?**

The CT Qualifying Candidate must have a valid ARRT R registration or NMTCB certificate and meet one of the following criteria before January 1, 2019:

- 1) Successfully complete the ARRT CT registry; or
- 2) Complete the CT Initial Qualifications for education and for supervised documented clinical procedures under the personal supervision of an individual who meets the NC CT personnel requirements within a 24 month period;
- 3) Must be in training under the personal supervision of a Qualifying CT Candidate (i.e., an individual who has already met the CT Personnel Requirements described in Rule .0611).

**How should a facility prepare the documentation of its CT technologists' credentials for an upcoming inspection by the Radiology Compliance Branch of the NC DHHS DHSR Radiation Protection Section?**

At the time of inspection, a notebook or file with copies of the **Initial CT Qualifications Documentation** for all technologists performing diagnostic CT exams should be available. Once the file or notebook is compiled, the facility should develop a method of tracking to ensure that additional documentation is acquired as needed (i.e., when documents expire or new CT technologists are hired). Typically, facility administration designates one person to maintain this documentation.

**In addition to the documentation of CT technologists' qualifications, what other documents should be available to inspectors from the Radiology Compliance Branch of the NC DHHS DHSR Radiation Protection Section?**

Copies of the System Performance Evaluations of the CT scanners as well as the credentials of the CT Qualified Expert (CT QE) who performed the evaluation should be maintained for inspections.

**What does "equivalent" mean in the phrase, "the individuals shall document training and experience that is equivalent to that required to attain (CT) registration with ARRT" in Rule .0611 (d)(2)?**

Alternative training and experience will be evaluated by the agency whenever such alternatives are proposed. However, no suggested alternative training and experience has been approved by the agency that demonstrates equivalence to the ARRT CT requirements for structured education clinical experience.

Furthermore, no other registration or certification exam has been approved by the agency that is an equivalent alternative to the ARRT CT exam.

**I am an X-ray technologist with the credential RT(R)(ARRT). Am I allowed to perform diagnostic CT scans in North Carolina?**

You may perform diagnostic CT scans provided:

- 1) You are in training under personal supervision of a CT Qualifying Candidate or
- 2) Your **Initial CT Qualifications Documentation** demonstrates compliances with Rule .0611. Such documentation must include your valid ARRT registration card, ARRT verification document, or ARRT CT certificate as well as the documentation that shows you have completed the structured CT education and clinical experience required by the Rule.

**I am a nuclear medicine technologist with the credential CNMT(CT). Am I allowed to perform diagnostic CT scans in North Carolina?**

You may perform diagnostic CT scans provided:

- 1) You are in training under personal supervision of a CT Qualifying Candidate or
- 2) Your **Initial CT Qualifications Documentation** demonstrates compliances with Rule .0611. Such documentation must include your valid CNMT certificate or verification document as well as the documentation that shows you have completed the structured CT education and clinical experience required by the Rule.

**What are the continuing education requirements for technologists who perform diagnostic CT procedures?**

The regulation does not any include continuing education requirements.