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GUIDANCE/INTERPRETIVE POLICY

Laboratory and Radiation Services Division

Colorado Department
of Public Health
and Environment

**SUBJECT: Minimum Requirements for Diagnostic
X-Ray Technologists at Hospitals and Similar Facilities**

Effective Date: 2/15/02

PURPOSE: This guidance/interpretive policy document is intended to address the question of minimum requirements for x-ray technologists in Colorado hospitals and similar facilities (as listed in section 25-1-107(1)(l)(I) in the Colorado Revised Statutes (C.R.S.)). It incorporates the opinion of the Attorney General's Office, and applies to requirements for x-ray technologists using equipment for diagnostic, as opposed to therapeutic, purposes. Requirements for operators of therapeutic x-ray equipment are covered separately in Part 20 of the Colorado *Rules and Regulations Pertaining to Radiation Control* (Regulations). It also excludes technologists administering mammography examinations. Requirements for mammography technologists are specified in RH 6.10 of the Regulations.

This is intended to replace any guidance/policy previously issued on this topic.

GUIDANCE/INTERPRETIVE POLICY: In a hospital or similar facility setting where the Board of Medical Examiners' and other governing boards' regulations do not apply, the applicable minimum requirements are specified in the Regulations as promulgated by the State Board of Health and administered by the Colorado Department of Public Health and Environment (Department).

RH 2.6.1.1 of the Regulations states that "the [machine] registrant shall allow only individuals to operate an x-ray machine who are trained in the use of the machine; in giving the exam(s) to be performed; and in radiation safety related to the x-ray machines." RH 6.3.1.1.2 states that registrants of x-ray systems shall assure that those who operate the systems are "adequately instructed in the safe operating procedures and [are] competent in the safe use of the equipment."¹

The Regulations do not address the requirements for diagnostic x-ray technologists to have passed the ARRT exam, or the Limited Scope exam.

The Regulations allow for flexibility in determining minimum requirements for x-ray technologists, and do not specify the manner in which these minimum requirements must be satisfied. Therefore, a hospital or similar facility may employ limited scope x-ray technologists.

Ultimate assurance of adequate instruction and competency is the responsibility of each facility. However, the Department is responsible to ensure that hospitals and similar facilities comply with the Regulations. The Regulations use the terms "adequate instruction and competency," but do not specify the method(s) by which "adequacy" must be established. In light of this, and for the Department to be able to exercise its authority in a meaningful manner, hospitals and similar facilities must keep record of the qualifications (training, education, competency, certifications, and/or experience) of staff performing diagnostic x-ray examinations for review by Department officials. This record keeping by the facility is essential in cases where limited scope technologists are performing examinations other than those covered in the ARRT limited scope exam designated for the State of Colorado.

¹ RH 6.3.1.1.2.1 of the Regulations further specifies that unlicensed persons shall meet the "training requirements, if any, of the appropriate licensing board." The "...appropriate licensing board..." requirement set forth in this section applies to settings other than hospitals or similar facilities.

Authorized by: Original signed by David A. Butcher

Date: 2/5/02

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