

# STATE OF COLORADO

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Colorado Department  
of Public Health  
and Environment

## **INTERPRETIVE GUIDANCE**

### **Hazardous Materials and Waste Management Division**

Radiation Control Program, X-Ray Certification Unit

**SUBJECT:** Interpretation of students enrolled in an American Registry Radiologic Technologists (ARRT) recognized two (2) year educational program.

#### **Basis and Purpose:**

There has been some question as to the interpretation of 6 CCR 1007-1, Part 2, Section 2.6.1.4 of the *Rules and Regulations Pertaining to Radiation Control*. The Department has become aware of students enrolled in American Registry of Radiologic Technologist (ARRT) programs performing duties within a radiology department that exceeds the scope and purpose of the current Part 2, 2.6.1.4. This Guidance is intended to clarify any misunderstanding of the meaning of this section of the Regulation.

6 CCR 1007-1, Part 2, 2.6.1.4 states that x-ray students are exempt from the requirement of 2.6.1 for the duration of a two (2) year radiologic technology program that is recognized by the ARRT. The exemption applies to x-ray students while enrolled in a radiology program. The purpose is to allow students to complete an internship and clinical rotation in order to meet the clinical obligations necessary to sit for the ARRT examination. Students enrolled in an ARRT-recognized program must be monitored under direct supervision of a qualified radiologic technologist while completing the clinical rotation requirements. "Direct supervision," as defined in 2.2 of the Regulations, means the supervisor must be present in the facility and immediately available to offer any assistance or guidance to the student while the student is performing various radiological procedures.

This guidance will also clarify the meaning and intent of the amended Regulation dealing with this topic, which is to become effective on July 1, 2010.

#### **I. INTERPRETATION OF CURRENT REGULATIONS, EFFECTIVE THROUGH JUNE 30, 2010**

##### **Scope:**

The following Guidance regarding Part 2, 2.6.1.4, applies to all students enrolled in an ARRT-recognized radiologic technology two (2) year program. It will be applied until the expiration of the current Regulation (June 30, 2010).

##### **Current Regulation:**

Part 2, 2.6.1.4, provides as follows:

A student, enrolled in an ARRT-recognized two-year program, shall be exempt from the requirement 2.6.1 for the duration of the two-year program, so long as the student works under the direct supervision of a qualified radiologic technologist and has documentation from the program that the student has completed education and experience equal to that specified in the adequate training appendices of this part as appropriate for the assigned use of x-ray systems or any radiation machine.

**Supporting Regulations:**

2.6.1 The registrant shall be responsible to ensure that the requirements of these regulations are being complied with for the operation of the radiation machine facility.

2.6.1.1 In any facility regulated by or requiring registration under these regulations, the registrant shall allow only individuals who are adequately trained in radiation safety and the safe and effective use of the machine to operate any radiation machine.

2.6.1.2 At least annually, the registrant shall make a written evaluation of the qualifications of all persons permitted to operate any or all radiation machines at the facility. Records of such evaluations shall be maintained by the facility and produced for examination upon request during any inspection conducted under the requirements of these regulations.

2.6.1.6 For radiographic x-ray systems used on living humans, “adequately trained” shall mean that the individual has met the requirements of Appendix 2D by: 1) Being an ARRT-registered radiologic technologist, or having at least equivalent training, certification and/or registration; or 2) Having been approved as a limited-scope x-ray machine operator by passing the Department-required examination.

**Interpretation:**

Under the current Part 2, 2.6.1.4, a student enrolled in an ARRT-recognized program may perform x-ray procedures under the direct supervision of a qualified radiologic technologist, so long as the student has met the applicable education and experience requirements. The purpose of this provision is to allow a student to obtain the knowledge and expertise needed to graduate, to meet the clinical obligations needed for the ARRT registry, and to perform radiologic procedures as needed to meet the requirement of Part 2, 2.6.1.

Students enrolled in an ARRT-recognized program may not perform any radiologic procedure unless they are under direct supervision during their clinical rotation. There is no provision in Regulation for student employment. The Regulation addresses only the educational and experiential requirement while being enrolled in an ARRT-recognized program.

Upon graduation or completion of the ARRT-recognized program, the graduate does not meet the requirement of Part 2, 2.6.1 until successfully passing the ARRT examination. All students enrolled in such programs must apply for a 90 day waiver (exemption) from Part 2, 2.6.1.6 in order to comply with the Regulations. This waiver is good for only one 90 day period and starts from the day of graduation. During the waiver period, the graduate may operate an x-ray machine as an “adequately trained” x-ray operator and is considered to meet the requirements as outlined in Part 2, 2.6.1.6 and Appendix 2D. A person who passes the examination is considered to meet the requirements of the Part 2, 2.6.1.6. Any person failing the ARRT examination will not be able to continue to operate an x-ray machine and will not be given an additional 90 day waiver.

In summary, a student may only operate x-ray machines and perform radiographic procedures under two conditions. The first condition requires the student to be under direct supervision of a qualified radiologic technologist while in clinical training. The second condition requires the student to have completed education and experience equal to that specified in the adequate training appendices of the Regulations.

A person who has graduated from an ARRT-recognized program may perform radiographic procedures under a 90 day waiver which meet the requirements in Part 2, 2.6.1.6 and Appendix 2D.

In addition, any student enrolled in an ARRT-recognized program who meets the requirements of Part 2, Appendix 2D may request with application to the Department to take the ARRT State limited-scope operator examination. Upon successfully passing that examination, such person may operate an x-ray machine and will have met the requirement of Part 2, 2.6.1.6 and Appendix 2D. A limited-scope operator who is recognized by the Department may operate an x-ray machine, but is limited to procedures as determined by the requirement in Part 2, 2.6.1.5 (1).

## II. INTERPRETATION OF REGULATION BECOMING EFFECTIVE ON JULY 1, 2010

### Scope:

The following Guidance regarding the amended Regulation, Part 2, 2.6.1.14, will apply to all students who are enrolled in an ARRT-recognized radiologic technology two (2) year program at the time the new Regulation takes effect (July 1, 2010).

### Regulation (Effective as of July 1, 2010):

Part 2, 2.6.1.14, will provide as follows:

An individual, enrolled in an ARRT-recognized program or graduated there from, may operate radiation machines so long as the individual works under the direct supervision of a radiologic technologist or other qualified trainer and has documentation of having completed education and experience equal to that specified in the program.

- (1) A graduate from an ARRT-recognized program is granted ninety (90) calendar days from the date of graduation to schedule, take and pass the radiologic technology registry examination.
- (2) During the 90-day period allowed by 2.6.1.14 (1), the graduate is considered to satisfy Appendix 2D.
- (3) A student or graduate who fails to pass the registry examination has not met the requirements of Appendix 2D and shall not operate any radiation machine system on a living human unless otherwise authorized by the Department.

### Supporting Regulations:

2.6.1 In any facility regulated by or requiring registration under these regulations, the registrant shall allow only individuals who are adequately trained in radiation safety and the safe and effective use of the machine to operate any radiation machine.

2.6.1.4 For any radiographic x-ray system used on a living human (not inconsistent with 2.6.1.2, 2.6.1.3, and 2.6.1.5 through 2.6.1.14), "adequately trained" shall mean that the individual meets the requirements of Appendix 2D.

### Interpretation:

As of July 1, 2010, under the new Part 2, 2.6.1.14, a student enrolled in an ARRT-recognized program may perform x-ray procedures during their clinical rotation under the direct supervision of a qualified radiologic technologist or other qualified trainer, so long as the student has met the applicable education and experience requirements.

To reiterate, students enrolled in an ARRT-recognized program may not perform any radiologic procedure unless they are under direct supervision during their clinical rotation. There is no provision in Regulation for student employment. The Regulation addresses only the educational and experiential requirement while being enrolled in an ARRT-recognized program.

As of July 1, 2010, any student graduating from an ARRT-recognized program will automatically be granted a ninety (90) day waiver from the date of graduation. The student will no longer be responsible for requesting in writing a waiver. Part 2, 2.6.1.14(1) and (2) replace the written waiver request requirement.

In addition, any student enrolled in an ARRT-recognized program who meets the requirements of Part 2, Appendix 2D may request with application to the Department to take the ARRT State limited-scope operator examination. Upon successfully passing that examination, such person may operate an x-ray machine and will have met the requirement of Part 2, 2.6.1.6 and Appendix 2D.

This Guidance may be revoked pending any regulation changes in Part 2 by this Department. Any questions or comments regarding this document should be addressed to the X-Ray Certification Unit at 303-692-3427, by fax at 303-759-5355 or by sending an email to [Brian.Vamvakias@state.co.us](mailto:Brian.Vamvakias@state.co.us).

Authorized by:  Date: January 27, 2010  
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