

CRCPD SURVEY OF X-RAY CT SCREENING DEC.'02 - MAR.'03

1. The state regulates x-ray CT scanners
- Directly [i.e. identified as CT]? CA .. FL .. GA IL LA . MD MS . MO NE .. NJ .. OR .. PA UT . WV
 - Indirectly [as a radiation machine] AL ID KS MI
 - Yes IA MA TX
 - Not at all
- Registration is required: AL . CA .. FL .. GA . ID ... IL .. IA .. KS .. LA . MD MA . MI . MS . MO NE .. NJ .. OR .. PA . TX .. UT . WV
- Not required:
- Inspection is made: AL . CA .. FL .. GA . ID ... IL .. IA .. KS .. LA . MD MA . MI . MS . MO NE .. NJ .. OR .. PA . TX .. UT . WV
- Not made:
- Are there RCP requirements for ownership of a CT
- Yes MD MA TX
 - No ID ... IL KS .. LA MI MO NE .. NJ .. OR .. PA UT
 - Not regulated by RCP: AL . CA .. FL
- Are there requirements for "facility self-referral"
- Self-referral not allowed GA
 - Self-referral allowed in state only for mammography OR
 - Yes MD MA TX
 - Any Exp. to x-ray must be Sp. ordered by a physician KS .. LA
 - No ID ... IL MI . MS . MO NE PA
 - Not regulated by RCP AL . CA .. FL
2. X-ray equipment regulations are enforced by
- Department of health: AL . CA .. FL ID IA MA MS . MO NE .. NJ .. OR TX WV
 - Department of environmental protection: KS .. LA . MD NJ PA UT
 - Dept. of Human Resources GA
 - Dept. of Nuclear Safety IL
 - Dept. of Consumer and Industry Services MI
 - Board of medical examiners:
3. Does the state regulate users of CT [re radiation safety]:
- Yes AL . CA .. FL .. GA IL .. IA .. KS .. LA . MD MA MS NE .. NJ .. OR .. PA . TX .. UT . WV
 - No ID MI MO
- Does the state have licensure for Radl. Technol. or similar
- Yes CA .. FL IL .. IA LA . MD MA MS NE .. NJ .. OR .. PA . TX WV
 - No ID KS MI MO
 - Not licensure, but training requirements: AL GA
- Who, besides a licensed practitioner, may expose humans to x-rays from CT?
- Anyone MO
 - X-ray screening approved by the Board of Health AL
 - Anyone allowed by the person responsible for the device ID
 - Anyone trained and under supervision of Lic. Practit. KS PA
 - Any adult under supervision of a licensed practitioner MI
 - Accredited (licensed) technologist IL LA . MD MA MS NJ .. OR TX

MD or Technol. certified to do Diag., Ther. or Mammo CA
 Physician Asst., state licensed Med. radiographer NE
 (several categories) most under Superv. of Lic. Practit. FL
 No one: UT . WV

4. Is a prescription or order from a person's physician required for a CT screening procedure to be performed:

Yes CA ID IL LA NE NJ OR
 Yes, except self-referral allowed for heart exam TX
 Yes, by licensed practitioner of the healing arts AL FL GA MD UT
 Yes, by licensed practitioner, after an exam KS
 No, if the state has approved the screening program IA MA MS PA WV
 No MI MO
 If prescribed or ordered, it's not screening PA

Are facilities required to have criteria or a protocol in place for verifying the appropriateness of this prescribed procedure?

Yes: ID LA NJ TX WV
 Regulated by the practitioner's licensing board FL
 No: CA IL KS MD NE OR UT

5. If a person does not have an order or a prescription for a CT screening procedure from a licensed practitioner, may a licensed physician at a screening facility write a prescription?

Yes AL CA FL GA ID IL LA MD MI MS MO NJ OR TX UT
 Yes, if the RCP has approved the screening program IA
 Yes, after an exam by the physician KS NE
 If prescribed or ordered, it's not screening PA

What if a screening facility refuses to screen patients with symptoms of disease?

Not addressed in RCP Auth. & rules AL CA FL GA IL LA MA MS MO NJ UT
 The facility has that right MI OR PA TX
 Screening is not performed on symptomatic patients MD
 State does not allow screening ID

6. Under what conditions can the owner/operators of a CT scanning facility refer patients to their own facility?

Not addressed in RCP rules AL FL MA MS UT
 Not prohibited by the state radiation control rules IL MI MO NE PA
 If by a state-licensed physician GA IA LA MD TX WV
 If not in violation of Fed. conflict of interest law ID OR
 By order from a licensed practitioner, after an exam KS
 Prohibited, so far as known to RCP CA NJ

7. May a practitioner of the healing arts, licensed in another state refer patients for a CT scan in your state?

Yes ID LA MA MS NJ UT
 Yes, if holding reciprocal recognition by the state PA
 Yes, but their agent must ensure that exam is per rules CA
 Yes, but a physician licensed in state must supervise MI
 No, only Practit. licensed in this state AL FL GA IL IA KS MD MO NE OR TX WV

8. Does the state allow "healing arts screening" with x rays where patient may self-refer for CT scans of w.b., lung, heart, colon?
- Yes MI . MS . MO PA
 - Yes, if the screening was approved by state ID IA .. KS MA UT . WV
 - Yes, if exam under supervision of a licentiate CA
 - Only for heart CT TX
 - State has not approved such a screening AL LA NE UT
 - No. CT exam must be prescribed by a Lic. practitioner FL .. GA MD NJ .. OR
 - No. If authorized by a physician, it's not screening IL
 - Check here if you don't have regulations to prevent it. MI . MS . MO
9. Do you have any population criteria for who can be screened by a CT, w.b., lung, heart, colon?
- Yes, for heart exam TX
 - Applicant must propose & justify the Pop. to be screened PA WV
 - Descr. of population required in Appln. for screening KS MS
 - No, no exam if age <30 y, symptomatic, or can't pay MD
 - No CT screening is currently authorized AL ID
 - No CA .. FL .. GA IL LA MA . MI MO NE .. NJ .. OR UT
10. Who may interpret a CT scan?
- Not addressed in RCP rules: AL FL IL MA TX
 - Licensed practitioner: CA .. GA .. ID IA .. KS MD .. MI .. MS .. MO NJ .. OR UT
 - Radiologist: CA GA .. ID IA .. KS .. LA MI .. MS .. MO NJ .. OR UT
 - Board Certified Radiologist: CA GA .. ID IA .. KS MI .. MS .. MO NJ .. OR UT
 - All of above if licensed in the state NE PA WV
 - Neurologist LA
11. Is a licensed physician required to be on-site during all screening CT procedures?
- Only if contrast media is used ID
 - If specifically required in the approval AL WV
 - No CA .. FL .. GA IL .. IA .. KS .. LA . MD MA . MI . MS . MO NE .. NJ .. OR TX .. UT
12. Do you have special requirements for mobile facilities that operate CT scanners in your state?
- Yes TX
 - Notification of location AL IL OR
 - Notif. required of out-of-state services PA
 - No CA .. FL .. GA .. ID IA .. KS .. LA . MD MA . MI . MS . MO NE .. NJ UT . WV
13. Is a facility required to provide information to a patient about CT screening, i.e., report of findings, recommendations for follow-up, false positive or false negative rates, etc.?
- Yes IA MD MS
 - Report required; no requirement on false positives etc. NJ
 - Addressed in procedures submitted for approval KS PA . TX WV
 - No CA ID .. IL LA MA . MI MO NE UT
 - Not addressed in RCP rules: AL FL .. GA OR
14. If you measure dose:
- Not measured AL FL MA MO NE OR TX
 - Do you have dose limits for specific procedures?
 - Refer to MFR, CTDI WV

No CA GA . ID ... IL .. IA .. KS .. LA . MD MA . MI . MS . MO NJ PA UT

What typical doses are your inspectors finding?

130 mr to head ID

NEXT head MSAD 50.3 mGy, eff. dose 2 mSv CA

in 10 mm slice, 10mm 160-200 mr @ bottom of phantom KS

185-200 @ bottom, 250-380 free air

in 5 mm slice, 10mm 80-98 mr @ bottom of phantom

125-185 free air

MFR, CTDI +/- 20% WV

3-5 rad for MSAD IL

MSAD 2.7 to 8.2 rad, ave. 4.8 rads for 12 NEXT surveys MI

2-7 R MSAD MS

To 14 rads whole body LA

15. Has your state issued any "health advisories" on CT Screening?

If so, please attach.

Yes KS PA . TX .. UT

The FDA advisories were distributed AL FL

None issued: CA GA . ID ... IL .. IA LA . MD MA . MI . MS . MO NE .. NJ .. OR WV

Dear Radiation Control Program Director:

This survey is in response to an inquiry from a reporter doing an article for Oncology Times. He is interested in providing advice for clinicians who have patients who want a whole-body CT screening scan. His research led him to CRCPD for information about the regulation of CT scanning and he would like a concise summary of the state regulations specific to this area. We believe this information would be useful to all our members.

Please answer the following questions on behalf of your state. If there are regulations governing CT scanning, even if they are enforced by a different agency than yours, please attach a copy of the pertinent parts of those regulations.

Name of State:

1. Does your state regulate x-ray CT scanners directly or indirectly?

Do you require registration?

Do you inspect?

Do you have requirements for ownership of a CT, and “facility self-referral?”

2. Are these x-ray equipment regulations enforced by:

- a. The Department of Health
- b. The Board of Medical Examiners
- c. The Department of Environmental Protection
- d. A combination of these – please explain.

3. Does your state regulate the users of CT machines?

Do you have licensure for radiologic technologists or similar operators?

Who, besides a licensed practitioner, can expose humans to x-rays from CT?

4. Is a prescription or order from a person’s physician required for a CT screening procedure to be performed?

If yes, are facilities required to have criteria or a protocol in place for verifying the appropriateness of this prescribed procedure?

5. If a person does not have an order or a prescription for a CT screening procedure from a licensed practitioner, may a licensed physician at a screening facility write a prescription?

What if a screening facility refuses to screen patients with symptoms of disease?

6. Under what conditions can the owner/operators of a CT scanning facility refer patients to their own facility?

7. Can a practitioner of the healing arts, licensed in another state, refer patients for a CT scan in your state?

8. Do you allow “healing arts screening” with x rays where a patient may self-refer for CT scans?

- a. For whole-body?
- b. For lung?
- c. For heart?
- d. For colon?
- e. Check here if you don’t have regulations to prevent it. _____

9. Do you have any population criteria for who can be screened by a CT?
 - a. For whole-body?
 - b. For lung?
 - c. For heart?
 - d. For colon?
10. Who may interpret a CT scan?
 - a. Licensed practitioner?
 - b. Radiologist?
 - c. Board Certified Radiologist?
11. Is a licensed physician required to be on-site during all screening CT procedures?
12. Do you have special requirements for mobile facilities that operate CT scanners in your state?
13. Is a facility required to provide information to a patient about CT screening, i.e., report of findings, recommendations for follow-up, false positive or false negative rates, etc.
14. If you measure dose:
 - a. Do you have dose limits for specific procedures?
 - b. What typical doses are your inspectors finding?
15. Has your state issued any "health advisories" on CT Screening? If so, please attach.

MEMORANDUM

Date: 5 March 2003
To: Ron
From: Terry
Re: Results of CT survey

Here is a 1st draft compilation of the returns, for you to consider format and cover letter.

I've yet to check the data here against the returns.

The RCP staff, Prof. Assn's. and vendors will wish to know who said what, I'm entirely confident.

Many of the questions and replies do not lend themselves to 'yes' or 'no' compilation.

Quite a few responders were confused or non-responsive to certain questions, so not every question has replies shown for every state.

I did take some liberty in bending the reply into an existing alternative answer, but not much. In most cases I added to the original alternatives.

Note that I deleted some sets of alternative replies; no one used these.

I slightly reworded a few of the questions into declarative; perhaps you'll want the original form.

I was quite confused by the dose data in Q.14

That the dot-leaders end with the last entry on the line I find helpful in reading the info,