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 
  - AL, CA, FL, GA, IL, ID, IA, KS, LA, MD, MA, MI, MS, MO, NE, NJ, OR, PA, TX, UT, WV
- 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 
  - AL, CA, FL, GA, ID, IL, IA, KS, LA, MD, MA, MI, MO, NE, NJ, OR, PA, TX, UT, WV
  - No 
  - AL, CA, FL
- 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, PA, TX, UT, WV
- Dept. of Human Resources 
  - KS, LA, MD, NJ, PA, UT
- Dept. of Nuclear Safety 
  - GA
- Dept. of Consumer and Industry Services 
  - IL
- Board of medical examiners: 
  - MI

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 
- Does the state have licensure for Radl. Technol. or similar
  - Yes 
  - CA, FL, IL, IA, ID, KS, LA, MD, MA, MS, NE, NJ, OR, PA, TX, UT, WV
  - No 
- Not licensure, but training requirements: 
  - AL, GA

Who, besides a licensed practitioner, may expose humans to x-rays from CT?
- Anyone allowed by the person responsible for the device: 
  - ID
- Anyone trained and under supervision of Lic. Practit. 
  - KS
- Any adult under supervision of a licensed practitioner 
  - PA
- Accredited (licensed) technologist 
  - IL, LA, MD, MA, MS, NE, 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 . IL . LA . NE . NJ . OR
   Yes, except self-referral allowed for heart exam .................. CA . IL . LA . NE . NJ . OR
   Yes, by licensed practitioner of the healing arts ................ AL . FL . GA . MD 
   Yes, by licensed practitioner, after an exam .................... KS
   No, if the state has approved the screening program ........... IA . MA . MS 
   No, if prescribed or ordered, it's not screening ................. PA 
   If prescribed or ordered, it's not screening ...................... WV

   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 
   Yes, if the RCP has approved the screening program ........ AL . CA . FL . GA . ID 
   Yes, after an exam by the physician ................................. KS
   If prescribed or ordered, it's not screening ...................... 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 
   The facility has that right .............................................. MD
   Screening is not performed on symptomatic patients ............
   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 
   Not prohibited by the state radiation control rules ............ IL . MA . MS 
   Not in violation of Fed. conflict of interest law ................. GA . IA . LA . MD 
   By order from a licensed practitioner, after an exam .......... ID . KS
   Prohibited, so far as known to RCP ............................... CA
   Prohibited, so far as known to RCP ............................... 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 
   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 . KS 
   No, only Practit. licensed in this state .............................. 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?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Yes, if the screening was approved by state...</td>
<td>ID</td>
</tr>
</tbody>
</table>

| Yes, if exam under supervision of a licentiate... | CA |
| Only for heart CT... | PA |
| State has not approved such a screening... | TX |
| 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?

| 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 | LA | 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 |
| No | CA | FL | GA | IL | IA | KS | LA | MD | MA | MI | MS | MO | NJ | OR | TX | UT |

12. Do you have special requirements for mobile facilities that operate CT scanners in your state?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td>Notification of location...</td>
<td>AL</td>
</tr>
<tr>
<td>Notif. required of out-of-state services...</td>
<td>PA</td>
</tr>
<tr>
<td>No</td>
<td>CA</td>
</tr>
</tbody>
</table>

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.?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Report required; no requirement on false positives etc...</td>
<td>IA</td>
</tr>
<tr>
<td>Addressed in procedures submitted for approval...</td>
<td>KS</td>
</tr>
<tr>
<td>No</td>
<td>CA</td>
</tr>
<tr>
<td>Not addressed in RCP rules:...</td>
<td>AL</td>
</tr>
</tbody>
</table>

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 ................................. LA
in 5 mm slice, 10mm 80-98 mr @ bottom of phantom .......... MR
125-185 free air ........................................................... MS
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 ................................................................. LA
To 14 rads whole body ..................................................... MS

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 .......................... 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,