



Nevada State Health Division Technical Bulletin



Topic: Mammography Issues for Technologists and Registrants

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TO: Nevada Mammography Technologists and Registrants

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The information contained in this bulletin is for BOTH registrants of mammography machines and mammographers holding a certificate of authorization to operate a mammography machine under the Nevada Administrative Code (NAC), Chapter 457.

The Radiation Control Program (RCP) which is part of the Bureau of Health Care Quality and Compliance (BHCQC) of the Nevada State Health Division (NSHD) has noted in the past fiscal year that several facilities and individual mammographers have had issues of late concerning the renewal of certificates resulting in citations and civil penalties. The imposition of penalties is not the primary focus of the RCP. The RCP is interested in compliance with the NAC chapters 459 (Hazardous Material) and 457 (Cancer) regarding the safe operation of radiation machines for the protection of the operators and protection of the general public.

Mammographers:

In Nevada mammographers need specific credentials to be issued a certificate of authorization to operate a mammography machine. It is illegal to operate a machine without this certificate. The responsibility for assurance that a person has this is that of the machine registrant and the technologist. The certificate is valid for a period of three (3) years; however, at any given day the technologist is to be current on the continuing education units (CEUs) of 15 units in a sliding 36 month period—this is unlike the American Registry of Radiologic Technologists (ARRT) which uses a 24 month cycle- AND the mammographer also needs to be current in experience by the exams performed, 200 in a 24 month period. These are U.S. Food and Drug Administration (FDA) and State of Nevada regulations.

New applicants are required to submit certain credentials for approval to be issued a certificate. These currently include, but not limited to, proof of training, CEUs, experience and other personal identifying information. One may NOT ASSUME that approval is automatic and begin working in the profession. If after submission you do not receive an answer in a reasonable time, call and check on the status BEFORE you begin work.

Renewal applicants are required, but not limited to submission of their CEUs, providing the current copy of their ARRT card as well as the usual personal identifying information. You must submit this prior to the expiration of your certificate. It is WISE to do so to allow time for questions to be answered and supplemental information to be provided if requested. Again the onus is on the mammographer to check on the status—you cannot assume approval and work after the expiration date of your certificate. You cannot wait for a renewal invoice; you need to be on top of your professional credential. You personally and your employer may be cited if you are working without benefit of a current valid certificate, and penalty may be applied. If you change your address you are to notify the RCP. Without a correct address, you will not receive your renewal application. This is your responsibility.

In all cases, the submission must be complete and the fee must accompany the application or no action will take place on the submission. The cashing of the check does NOT imply approval.

Mammography Machine Registrants:

Be aware of the foregoing information and your responsibility related to mammographers.

The machine is your responsibility. The timely renewal of the machine registration or initial registration of it is your responsibility.

Unlike general medical Radiation machines where there is a 30 day window to register, a mammography machine CANNOT be operated without a certificate on premise. The registration is much more complicated than a general radiation machine and will require a mammographer probably to assist in completion of the application. Prior to registration, and then annually, it is required that a physicist (holding a Nevada certificate) complete a survey on the machine; this is both a State and FDA regulation. This means that no training with patients can take place until these requirements are met.

You are responsible, as noted, for the timely renewal. This means to renew leaving enough time for corrections and supplemental submission to the RCP as/if needed. No action will be taken on submissions unless it is complete including the fee. Cashing of the check does not imply approval.

Summary:

- Mammographers must hold a valid certificate at any given moment to preform mammography.
- Mammographers may be fined if practicing without a valid certificate.
- Mammographers are responsible for timely submission of renewal and to follow up on the submission.
- Registrants of machines are responsible for the registration and renewal of machine certificates and original registrations.
- A machine cannot be operated without a valid certificate
- Registrants are responsible for the time submission of renewals and follow up of the submission
- Registrants are responsible for mammographer staff in their facility.
- Any changes involving certificates render them invalid are to be reported the RCP, not limited to address change only.
- Cashing of the check for fees does not imply approval of your application or renewal. Confirmation of approval is the responsibility of the applicant.

Should you have any questions please consult the NAC Chapters 457 and 459 and/or the FDA Policy Guidance Document or call the RCP at 1-775-687-7550. You are our customers and we are here to serve you, the regulated community in regards to safety in the radiation area.



SIGNATURE

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DATE

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