QUESTIONS AND ANSWERS
LIMITED-SCOPE X-RAY OPERATORS
Rules and Regulations Pertaining to Radiation Control (6CCR 1007-1)

QUESTION 1:  Does the CDPHE require any paperwork for individuals who are already limited-scope operators?
ANSWER: Yes, Part 2, 2.6.1.5 and 2.6.1.6 requires the operator to submit for approval evidence of prior registration or letter of approval that the State ARRT Limited-Scope Operator exam has been taken with a passing score. Form R-90 must be completed and faxed or mailed to the Department.

QUESTION 2:  What is required to meet the 480 hours of clinical training and who can provide this training?
ANSWER: Those individuals enrolled in an educational program for Limited-Scope may get the 480 clinical hours of training in the office/clinic setting. No more than 160 hours can be obtained in the laboratory setting where the student is enrolled. Other methods to document 480 hours of clinical training can be accomplished under the supervision of a qualified trainer which include: a physician, Radiologic Technologists or others as outlined in Part 2, 2.2. of the definitions. Part 2, Appendix 2D 4.2 and 2D4.3 through 2D4.3.20 list the examinations required under personal supervision. The 480 hours is not based solely on exam time, but the time in the clinic/office. Individuals not enrolled in an accredited school may receive clinical hours in the clinic/office setting only, which must be documented on Forms R-72 and R-73 and submitted to the Department with an Application to register (Form R-70).

QUESTION 3:  Does the CDPHE give the Limited-Scope X-ray Operator test?
ANSWER: No, the CDPHE does not give the examination to the operator. However, registration for the Limited-Scope Operator examination is done through the Department. Forms with the instructions may be obtained on the CDPHE website to register to take the Limited-Scope Operator exam administered by the American Registry of Radiologic Technologists (ARRT). Those forms are: R-70, R-71, R-72, and R-73. Any questions regarding the forms and instructions may be directed to the X-Ray Certification Unit.

QUESTION 4:  Who is qualified to supervise the clinical training portion for limited scope?
ANSWER: A “qualified trainer” is an individual whose training and experience adequately prepares the individual to carry out specified training assignments. The qualified trainer may be a physician, technologist, limited-scope operator or formal instructor employed by a training or educational facility. Part 2, 2.2 gives an accurate description of the qualified trainer.
QUESTION 5: What does a qualified trainer mean?
ANSWER: A “qualified trainer” is defined in Part 2, 2.2 of the definitions in Part 2 of the Rules and Regulations Pertaining to Radiation Control. Examples of a qualified trainer include individuals already trained in the specialty, physicians, radiologic technologists and medical physicists.

QUESTION 6: Is all the clinical training done under personal supervision for limited-scope operators?
ANSWER: Part 2, Appendix 2D4.2 explains that during the 480 hours of clinical training, all x-ray procedures performed must be done under personal supervision. Personal supervision is defined as a qualified trainer present in the room during the procedure.

QUESTION 7: How is the 80 hours of didactic training obtained?
ANSWER: There are a variety of methods to acquire the 80 hours of didactic training. Part 2, Appendix 2D4.1 outlines the subjects to be covered in the 80 hours. Methods include accredited educational institutions, on-line courses, purchase of reading materials specific to training. The CDPHE can provide information on alternative methods and programs that are available.

QUESTION 8: Is there a form available to document training?
ANSWER: Forms can be obtained through the CDPHE website. Three forms are required for documentation of limited-scope training. R-71-- Checklist for Registration, R-72--Clinical Supervisory Statement and R-73--Clinical Competency Statement.

QUESTION 9: Can all limited-scope operators from other states work in the State of Colorado?
ANSWER: To work in the State of Colorado, the limited-scope operator must meet the requirements of Appendix 2D4, then register with the Department by filling out Form R-90. All limited-scope operators must submit proof through copies of certificates, evidence of training, and a certificate of completion of the ARRT State Limited-Scope X-ray Operator examination together with a $50.00 document review fee. Once these documents have been reviewed by the Department, an approval with certificate will be mailed to the registrant. Many states do not have the same requirements for limited-scope x-ray operators as Colorado, therefore, a registrant may not be eligible to work in Colorado. Part 2, Appendix 2D1 identifies the requirements.

QUESTION 10: What type of continuing education is required for limited-scope x-ray operators?
ANSWER: Limited-scope operators can obtain continuing education in any subject that is directly related to the radiology. Part 2, Appendix 2D5 states that the limited-scope x-ray operator maintains a minimum of 24 hours of continuing education every 2 years in the areas of radiology, radiation safety, radiography and similar fields. Individuals qualified in the field can provide continuing education, directed readings and websites also.
QUESTION 11: If the individual fails the limited-scope x-ray operator exam, can the test be taken over again? How many times can the test be given to someone who fails?
ANSWER: Part 2, Appendix 2D3.3 requires the registrant to pass the limited-scope ARRT State examination with a score of 75% or better. Applicants can retake the test or portions failed as many times as needed to reach the minimum scores. Each time the exam is failed; another application (Form R-70) and fees must be submitted to the Department.

QUESTION 12: If only portions of the ARRT State examination is failed, does the entire examination need to be retaken?
ANSWER: No, Part 2, Appendix 2D3.3 states that each module of the examination must be passed with a 75% or above. Each failed module can be taken over, but a $100.00 application fee to the ARRT must accompany a new application each time the test is taken regardless of the number of modules to be retaken. A $50.00 document review fee must accompany the application.

QUESTION 13: If the registrant has registered with the Department once, does the registrant need to register again after a certain length of time?
ANSWER: Yes, The Department requires documentation of 24 hours continuing education every 2 years. The Registrant will receive a renewal application sixty (60) days before their certificate expires. By attaching proof of 24 hours of CEUs to the Renewal Application together with the document review fee, the registrant will receive an updated certificate that expires in another 2 years.

QUESTION 14: If someone fails to register with the Department, will this individual lose their limited-scope status with the state?
ANSWER: Yes, Any LSO who has not registered with the Department by 7/1/07, or who does not maintain Department approval, will no longer be authorized to operate any x-ray machine until the individual has received written approval from the Department. The facility that employs the individual will be advised the individual is no longer authorized to take x-rays in Colorado.

QUESTION 15: Initially, how long does a limited-scope operator have to register with the Department?
ANSWER: Part 2, Appendix 2D and Part 2, 2.6.1.6 requires all limited-scope operators to be registered with the Department before June 30, 2007. All new limited-scope x-ray operators will receive a certificate of registration good for 2 years once passing results have been received from the ARRT state examination.

QUESTION 16: Is there a fee to register with the Department for limited-scope?
ANSWER: Yes, there is a $50.00 document review fee effective January 2006. Part 2, Appendix 2A.
QUESTION 17: What does the Department require for those limited-scope operators already recognized by the ARRT limited scope certification?

**ANSWER:** Part 2, 2.6.1.6 and Part 2, Appendix 2D4. The Department requires all limited-scope operators to register with the Department on or before June 30, 2007. A copy of the ITEP letter or other forms of documentation must be submitted to the Department with Form R-90 and a $50.00 document review. Out of state limited-scope x-ray operators wanting to work in the State of Colorado must have documentation of the ARRT Limited-Scope Examination with successful passing grade in all modules and documentation of permits/licenses issued by other states.

QUESTION 18: How long does a student in a limited-scope x-ray operator’s program have to register with the Department?

**ANSWER:** Part 2, Appendix 2D3 states that those students already enrolled in an accredited limited scope x-ray operator program prior to July 1, 2005 have until June 30, 2007 to register with the department. Once the student meets all requirements in Part 2, Appendix 2D, they must complete forms R-70, R-71, R-72 and R-73 together with fees for application to take ARRT limited-scope exam and $50.00 document review. Students enrolled in accredited limited-scope x-ray operator program after July 1, 2005 must meet the requirements of Part 2, Appendix 2D and complete the required documentation including all fees.

QUESTION 19: Is there a certificate from the Department once the x-ray operator registers with the Department?

**ANSWER:** Yes, a certificate of approval from the Department with a unique ID number and expiration date will be sent to the applicant. Part 2, 2D5.

QUESTION 20: How long does it take to get results of the ARRT limited-scope x-ray operator examination?

**ANSWER:** Once the test has been taken, the results will be returned to the Department. Those results will then be evaluated and a letter with results will be mailed to the individual within 2-4 weeks from examination date. No results will be given to employers or applicants over the telephone.

QUESTION 21: If the ARRT limited-scope examination is failed, is there another registration fee?

**ANSWER:** Yes, if applicant fails the test or portions of the test, then another registration fee to the ARRT and document review with the application needs to be sent to the Department. Application fees are required every time the ARRT limited-scope examination is taken. Part 2, 2.6.1.5. There are no refunds.
QUESTION 22: What procedures can a limited-scope operator perform?

ANSWER: Part 2, 2.6.1.5 defines the x-ray procedures a limited-scope x-ray operator can perform. Those examinations include skull, chest, spine, upper extremities and lower extremities.

QUESTION 23: Can limited-scope operator perform fluoroscopy or Computed Tomography procedures?

ANSWER: No, Part 2, 2.6.1.5 states that limited-scope operators CANNOT perform the following examinations: procedures involving the administration or utilization of contrast media, fluoroscopic equipment, mammography, computed tomography, or radiation therapy procedures.

QUESTION 24: Are rural areas of the state that have limited-scope operators given any special considerations in the regulation?

ANSWER: No, Limited-scope operators under Part 2, 2.6.1.5 must meet the same requirements regardless of the area of the state where they are employed.

QUESTION 25: Do I have to keep my continuing education documentation and when do I send it to the Department?

ANSWER: It is the registrants' responsibility to document and keep track of the continuing education credits until the renewal deadline. Sixty (60) days before the registrant's certificate expires, a Renewal Application (Form R-91) will be sent to the address on file with Department. The Renewal Application, and all continuing education documentation will be submitted to the Department along with a document review fee of $50.00.

QUESTION 26: Do I need to post my Certificate of Registration?

ANSWER: The certificate of registration should be kept on file with your employer. This certificate of registration may be posted for patients to view. The qualified inspector will review documents to ensure you are registered with the Department and your certificate has not expired. The Inspector may or may not review any continuing education credits.