




STATE OF ALABAMA DEPARTMENT OF
PUBLIC HEALTH

Donald E. Williamson, MD
State Health Officer

MEMORANDUM

DATE: July 18, 2002
TO: Office of Radiation Control Staff
FROM: Kirksey E. Whatley, Director 
Office of Radiation Control

SUBJECT: Procedures for Requesting Consideration of X-Ray Screening Studies

At the July 17, 2002, meeting of the State Board of Health, the Board clarified what constitutes "x-ray screening studies" and approved procedures for considering applications for x-ray screening studies.

For clarification:

{ Tests are deemed to be specifically and individually ordered when a patient is evaluated by a physician or other person legally authorized to order such tests. Such tests shall not be considered "screening." }

When tests are not specifically and individually ordered by a person legally authorized to order such tests the test is considered a screening test.

- Example 1: A physician in Mobile writes a protocol for chest x-rays to be taken in a factory in Opelika. The physician sends his/her technologist with the protocol to the factory. The technologist, follows the protocol in selecting patients for the chest x-ray tests without the physician individually ordering each tests. Such a testing operation is screening and requires specific approval prior to such screening taking place. The technologist is not licensed to provide such services in Alabama.
- Example 2: In the example above, had a physicians assistant or a certified nurse practitioner, using the physicians protocol, selected each patient, the testing would not be screening. Both a PA and a CNP have been approved to order certain x-rays (chest, extremities) following a physician's protocol.

Example 3: Had the physician actually selected each patient, that would not be screening. He/she is licensed to do so.

All studies which fall into the category of "screening" must be approved by the State Health Officer prior to the study being conducted. The attached "Criteria for Healing Arts Screening" contains information which all applications for screening must include.

When registration applications are received, a careful look must be made of the proposed use of the x-ray unit. **Whenever a registration for a screening application is received, that application shall be brought to the immediate attention of the Director of the X-Ray Section and the Director of the Office of Radiation Control.**

CRITERIA FOR HEALING ARTS X-RAY SCREENING

Office of Radiation Control
Alabama Department of Public Health
2002

“Healing arts screening” means the testing of human beings using x-ray machines for the detection or evaluation of health indications when such tests are not specifically and individually ordered by a licensed practitioner of the healing arts.”

- I. Tests are deemed to be specifically and individually ordered when a patient is evaluated by a physician or other person legally authorized to order such tests. Such tests shall not be considered “screening.”
- II. All healing arts screening programs shall be performed under the supervision of a licensed (in Alabama) practitioner of the healing arts.
- III. Screening radiographs shall be interpreted by a practitioner of the healing arts licensed in Alabama.
- IV. Any person proposing to conduct a healing arts screening program shall not initiate such a program without prior approval of the State Health Officer of Alabama.
- V. When requesting approval for healing arts screening, a person shall submit the following information:
 1. Name, address, and telephone number of the applicant and, where applicable, the names and addresses and telephone numbers of agents within Alabama;
 2. Address(es) where all healing arts screening activities will be conducted in Alabama;
 3. Diseases or conditions for which the x-ray examinations are to be used in diagnosis;
 4. A detailed description of the x-ray examinations proposed in the screening program;
 5. Description of the population to be examined in the screening program;
 6. An evaluation of any known alternative methods not involving ionizing radiation which would achieve the goals of the screening program and reasons why these methods are not used instead of the x-ray examinations;

7. An evaluation by a registered qualified expert of the x-ray system(s) to be used in the screening program;
 8. The evaluation by the qualified expert shall:
 - a. Show that such system(s) do satisfy all requirements of Alabama Radiation Protection Rules; and
 - b. Include a measurement of patient exposures from the x-ray examinations to be performed.
 9. A description of the diagnostic x-ray quality control program;
 10. A copy of the technique chart for the x-ray examination procedures to be used;
 11. The qualifications of each individual who will be operating the x-ray system(s);
 12. The qualifications of the individual who will be supervising the operators of the x-ray system(s), the extent of supervision and the method of work performance evaluation;
 13. The name and address and qualifications of the individual(s) who will interpret the radiograph(s);
 14. A description of the procedures to be used in advising the individuals screened and their practitioners of the results of the screening procedure;
 15. A description of the procedures for the retention or disposition of the radiograph and other records pertaining to the x-ray examinations; and
 16. An indication of the frequency of screening and the anticipated duration of the entire screening program.
- VI. All healing arts screening program applications will be submitted to the State Health Officer of Alabama for review and consideration of approval.
- VII. Healing arts screening programs will be approved for specified time periods after which the applicant must reapply if further screening is deemed necessary.