Indiana State Department of Health
Health Care Regulatory Services
Medical Radiology Services Program

Overview of Dental Radiography Licensing Process

ISDH HCRS Program Advisory Letter
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Purpose

The purpose of this program advisory letter is to inform dentists and dental assistants about the implementation of the new dental radiology licensing rules cited at 410 Indiana Administrative Code [IAC] 5.2.

Background Information

On September 20, 2006, the Indiana State Department of Health (ISDH) Executive Board adopted a revision to radiology licensing rules. The rule promulgation process was subsequently completed and the final rule became effective December 27, 2006. The final rule is codified at 410 Indiana Administrative Code [IAC] 5.2 and has been published in the Indiana Register.

Indiana statute does not require licensed dentists or dental hygienists to have a dental radiography license issued by the ISDH. That has not changed in the new rule. Dentists and dental hygienists may continue to take dental radiographs under their existing professional license issued by the Indiana Professional Licensing Agency. Students enrolled in a dental hygienist program are also not required to have a license or permit.

Summary of Changes to Limited Dental Radiography Licensing under the New Rule

There are three significant changes to dental radiography licensing under the new rule:

1. Limited dental radiography students must obtain a permit from the ISDH in order to take dental radiographs.
2. The "on-the-job" training system has been eliminated and replaced with a more structured training process.
3. Training programs for dental radiography must be approved by the ISDH.

Any individual regulated by the radiography licensing requirements must have a license or permit by July 1, 2007.

Limited Dental Radiography Students

Under the provisions of the new radiology licensing rule, students must obtain a permit in order to take dental radiographs. The permit is issued by the ISDH and must be obtained prior to taking any radiograph or performing a radiologic procedure. To obtain the permit, the students must submit an *Application for Provisional or Student Permit* [State Form 54176]. The *Application for Provisional or Student Permit* may be downloaded from the ISDH Medical Radiology Services Program homepage at http://www.in.gov/isdh/23279.htm. An application may also be requested by sending an email to radiology@isdh.in.gov or by calling 317-233-7565.

Students will be issued a permit based on the educational program in which the student is enrolled. In order to qualify for a student or provisional permit, the student must be enrolled in a radiology educational program approved by the ISDH. A "student permit" will be issued to a student enrolled in an American Dental Association accredited dental assisting program. The student permit expires six months after graduation from the dental assisting program or immediately upon withdrawal or termination from the program. A "provisional permit" will be issued to a student enrolled in a limited dental radiography educational program approved by the ISDH other than the American Dental Association approved dental assisting programs. Provisional permits expire six months from the date of issue or immediately upon withdrawal or termination from the program. There is no fee for the student radiography permit or the provisional radiography permit.

For additional information on the student and provisional permit process, see the ISDH Program Advisory Letter MRS-2006-02 on *Approval Process for Student and Provisional Radiography Permits.*

Elimination of "On-the-Job" Training

"On-the-job" dental radiography training has been eliminated under the new radiology licensing rule. On-the-job dental radiography training is being phased out by the end of 2007. No new students will be approved for on-the-job training after June 15, 2007. Students enrolled in an on-the-job dental radiography program as of June 15, 2007 will be issued a provisional permit. The ISDH will be issuing those permits by July 1, 2007. The provisional permit will expire in six months. By December 31, 2007 all on-the-job training students must have completed their training and passed the Dental Assisting National Board Radiation Health and Safety examination in order to continue taking dental radiographs.

Approved Dental Radiography Training Programs

The "on-the-job" training process is being replaced by a more structured educational process. The ISDH believes that this process will result in improved education and training. The goal is

to ensure that students are provided necessary training in a timely manner on radiation safety and quality of care. In fairness to students, the education needs to be sufficient to allow the students to pass the required Dental Assisting National Board Radiation Health and Safety Examination. The ISDH is developing a curriculum that will establish the minimum standards for training programs. The ISDH will review each program and approve those that meet the required standards.

The new training process has two components – an ISDH-approved dental radiography program and clinical training with certification of proficiency by an appropriate licensed provider. The two components may be obtained through a single source or different sources. For instance, a student could complete an online educational program through a dental association and then complete the clinical portion through a dentist. The requirements may also be met through a single source such as a dentist with an ISDH-approved educational program who then also provides the clinical training and proficiency. The didactic educational component may be completed prior to or simultaneous with the clinical portion.

Approval Process for American Dental Association approved Dental Assisting Programs

1. The educational program submits an *Application for Approval of Radiography Program* [State Form 53193].

2. Along with the application, the educational program submits proof that the program is approved by the applicable credentialing organization. Documentation should include the expiration date of the accreditation. Dental Assisting programs may satisfy the requirement by submitting a copy of a document showing approval by the American Dental Association or by a document showing current accreditation status by an accreditation organization recognized by the American Dental Association.

3. For dental assisting programs accredited by the American Dental Association, no additional documentation is required other than the documentation of appropriate accreditation.

4. Upon receipt of the completed application and verification by the ISDH, the ISDH will issue a letter of approval. The approval expires in five years of the date of issue or upon a change in the accreditation status of the program. The program must update the ISDH in a timely manner on the accreditation status of the program.

Approval Process for Limited Dental Radiography Programs

1. The educational program submits an *Application for Approval of Radiography Program* [State Form 53193].

2. Along with the application, the educational program submits the following program information:
   a. Detailed curriculum of the program

b. Overview of the program
c. Location of the program
d. Curriculum vitae and/or resume of all faculty showing credentials and educational and professional background
e. Description of clinical education and clinical evaluation system
f. Description of competency-based evaluation system

For more information on the program information required to be submitted, see the ISDH Program Advisory Letter MRS-2006-01 on *Approval Process for Radiography Educational Programs* available on the ISDH Medical Radiology Services website at http://www.in.gov/isdh/23279.htm.

3. The ISDH will evaluate the program information. The ISDH may have an *ad hoc* task force composed of health care professionals in the applicable category review the program information and make a recommendation for approval as an ISDH-approved limited radiography program.

4. Upon a determination by the ISDH that the program meets program requirements, the ISDH will issue a letter of approval. The approval expires in five years of the date of issue. The program must update the ISDH in a timely manner as to any changes in the program.

Questions and Answers

The following are representative questions relating to dental radiography licensing that the ISDH has received.

1. May an individual dentist still have their own dental radiography training program?

   ANSWER: Yes. A dentist may still maintain their own training program. The program however must meet the ISDH approved curriculum and must be approved by the ISDH. The dentist would apply to the ISDH to have the program approved. Upon approval, the dentist may "enroll" students into the program.

2. Is there a limit on the number of students in a dental radiography training program?

   ANSWER: No. The program must provide adequate services and resources to meet the educational needs of the students. The number of students is only limited by the ability of the program to meet those needs.

3. The dental radiography training program is the didactic portion of the training. May an individual complete the didactic educational program prior to being employed by a dentist?

ANSWER: Yes. In fact, the ISDH expects that many dentists will encourage potential employees to complete the dental radiography training program prior to being employed. This assists the dentist in assessing applicants in determining whether the individual is able to pass the examination requirements. If the student has already completed the program, upon passing the Dental Assisting National Board examination the individual would only need to complete the clinical training and certification of proficiency. Most dentists would provide this training anyway consistent with their office procedures.

4. What happens if the student cannot pass the Dental Assisting National Board examination prior to expiration of the provisional permit?

   ANSWER: Upon expiration of the permit, the student may no longer take radiographs. Once the student has passed the examination and has attained a certification of proficiency, the student is eligible for a dental radiography license.

5. What happens if the student's provisional permit expires and the student has not attained a certification of proficiency from an appropriate dental professional?

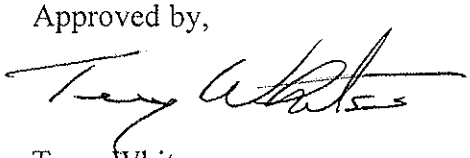
   ANSWER: If a student has completed an approved program and passed the appropriate Dental Assisting National Board examination, the student may request the ISDH to issue a 30-day provisional permit to allow the student time to obtain a certification of proficiency from a dental professional.

6. If a student attends an ISDH-approved dental radiography program, must the student complete the clinical work at one facility and with one dentist?

   ANSWER: A student is not limited to one facility or dentist. The student must have a provisional permit to perform dental radiographs as part of the clinical training. The certification of proficiency may be performed by a licensed dentist or licensed dental hygienist. The student is not limited to one facility or individual for attaining that certification.

Questions about this program advisory letter may be addressed to Dave Nauth, Medical Radiology Services Program Director, phone (317) 233-7563, dnauth@isdh.in.gov.

Approved by,



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