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

Approval Process for Student and Provisional Radiography Permits

ISDH HCRS Program Advisory Letter
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Purpose

The purpose of this program advisory letter is to inform radiography educational programs and students enrolled in those programs about the procedures for obtaining a student or provisional radiography permit pursuant to 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.

Under the provisions of the new radiology licensing rule, students must obtain a permit in order to take radiographs or perform regulated radiologic procedures. In order to quality for a student or provisional permit, the student must be enrolled in a radiology educational program approved by the ISDH. The permit is issued by the ISDH and must be obtained prior to taking any radiograph or performing a radiologic procedure.

The reason for requiring students to obtain a permit was primarily two-fold. First, in order to enforce state licensing requirements and promote radiation safety, the ISDH needed to be able to identify who is appropriately authorized to perform radiologic procedures. In the past there was no defined limit on the student exemption. This led to abuses where unauthorized and unqualified individuals were performing radiologic procedures. The student permit and provisional permit clearly place limits on the duration and scope of the student status. Second, the ISDH has released an online licensing system that will be used for issuing radiology licenses. By getting students into the system early in the process, the ISDH has a

means of identifying students. This allows the ISDH to provide the students with assistance and information about the licensure process.

Students will be issued a permit based on the educational program in which the student is enrolled.

- Students enrolled in a radiologic technology program will be issued a student radiography permit.
- Students enrolled in a nuclear medicine technology program will be issued a student nuclear medicine permit.
- Students enrolled in a radiation therapy program will be issued a student radiation therapy permit.
- Students in an American Dental Association approved dental assisting program will be issued a student dental radiography permit.
- Students enrolled in a limited radiography educational program will be issued a provisional radiography permit. This includes the limited radiography programs such as non-ADA approved dental radiography programs, chest radiography programs, podiatric radiography programs, chiropractic radiography programs, and cardiac catheterization certification programs.

Student permits expire six months after graduation from the program or immediately upon withdrawal or termination from the program. 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.

Application and Approval Procedure for Student and Provisional Permits

The following are the steps for obtaining a student radiography permit or provisional radiography permit:

1. In order to obtain a student permit or provisional permit, the student must be admitted to or enrolled in an ISDH-approved educational program.

2. The student obtains an *Application for a Provisional or Student Permit* [State Form 54176] A supply of application forms will be provided to ISDH-approved educational programs. The *Application for a 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.

   [Note on Online Applications: At the present time, applications are submitted via a hard-copy of the application form]

3. The student is not required to submit supporting documentation with the application with the exception that the student must submit a written explanation if the student answers "yes" to any of the compliance information questions. The ISDH will be verifying enrollment information with the educational program.

4. The student submits an *Application for a Provisional or Student Permit*. There is no fee for the student or provisional permit. Because there is no fee for the permit, the *Application* may be submitted directly to the Medical Radiology Services Program at Indiana State Department of Health, 2 North Meridian, Section 5-F, Indianapolis, IN 46204.

5. The ISDH will process the *Application*. Once the application is approved, the applicant will receive the permit in the mail. Verification of license status may be found online via the Indiana Professional Licensing Agency's system which is available 24 hours a day, 7 days a week at http://www.in.gov/pla/license.htm.

Guidance to Students and Educational Programs

1. The process for obtaining a student or provisional radiology permit is the same as for obtaining a radiology license. All that is required is an application.

2. Students may submit an application for a student or provisional permit prior to actually beginning the program. The application includes the date of enrollment in the program. After receiving the application and prior to approving the application, the ISDH will verify with the program the student's enrollment. The permit will not be issued until approximately one week prior to the start of the program. The online verification system may be used to verify that a permit was approved.

3. In the case of an application for a provisional permit, the permit will be issued immediately upon verification of enrollment with the educational program. The date of issue begins the six month period so the application should not be submitted by the student until the student is actually ready to begin the clinical activities designed to achieve competency.

4. If a student withdraws or is terminated from an educational program, the student and educational program should immediately notify the ISDH of the withdrawal or termination.

5. The expiration date of the permit is based on the expected graduation date of the educational program. The ISDH should be notified of any change in the graduation date so that the expiration date can be corrected.

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,

Terry Whitson
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Health Care Quality and Regulatory Services Commission
Indiana State Department of Health