

FREQUENTLY ASKED QUESTIONS

When will the old "OJT program" no longer be issued? ANSWER: The "OJT" program technically expired on December 26, 2006 when the previous rule was repealed and replaced with the new rule. To provide adequate time for the development of approved educational programs, the ISDH agreed to allow the continuation of OJT students until July 1, 2007. By July 1, all OJT students in our system will be issued a provisional permit. The student will then have until December 31, 2007 to successfully pass the DANB examination. As of July 1, 2007, there are no new "OJT" students and all dental radiography students must have a provisional permit in order to take dental radiographs.

When can a dental assistant apply and receive a provisional permit? ANSWER: The new rule providing for provisional permits became effective on December 26, 2006. The ISDH is accepting applications and can issue provisional permits. The ISDH has cautioned individuals that a provisional permit expires in six months. In consideration of the July 1 date requiring everyone to obtain a permit or license, the ISDH has recommended that it might be in the best interests of the individual to wait until May or June to apply. That would then give individuals the maximum time to complete the DANB examination. Now that we are in mid-May, applications for provisional permits should now be submitted. Where appropriate, we are adjusting expiration dates to December 31, 2007 to allow everyone the same time to complete initial licensing requirements.

Does a licensed practitioner who is going to do only the clinical portion of the program need to apply for that status? ANSWER: No. The rules allow certification of proficiency by a licensed practitioner, licensed radiologic technologist, or licensed dental hygienist. The ISDH will verify that the certifier is appropriately licensed when reviewing an individual's application for a radiography license. There is no application or registration procedure for the certifying practitioner or hygienist.

Can any licensed dentist certify the assistant competent to take radiographs? ANSWER: Yes. The assistant still is required however to complete an approved educational program and pass the DANB examination. Those requirements are separate from the certification of proficiency.

Is there something we can do when a dentist tells the assistant that takes a 10 week course that they can now take x-rays and will be x-ray licensed and advertises this to the public? ANSWER: The ISDH determines whether an assistant has completed the licensing requirements. An assistant who does not meet licensing requirements will not be licensed regardless of what a dentist or other individual has informed the assistant. If any individual intentionally misinforms students as to the licensing requirements and the approval status of their program, the student may refer that individual to the Office of Attorney General for appropriate legal action. The ISDH is making an effort to work with dentists and dental assisting programs to ensure that programs are appropriately

approved and providing the education needed by students to complete licensing requirements.

If an assistant wants to apply for the provisional permit but is not employed in an office, should she wait until she can find a dentist who will provide the clinical portion or is employed? ANSWER: Once a provisional permit is issued, the permit is effective for six months and is not renewable. If a student is not employed or does not have an arrangement to obtain certification of proficiency, then the individual risks expiration of the permit without having obtained certification of proficiency. The ISDH therefore recommends that the individual not apply for the provisional permit until employed or having an arrangement to obtain certification of proficiency. In most cases, I recommend that a student complete most of an approved educational program prior to applying for a provisional permit. This increases the potential for completing licensing requirements (i.e. DANB examination and certification of proficiency) before expiration of the provisional permit. The ISDH is committed to processing applications within 48 hours of receipt so the individual should expect a quick turnaround on applications for a provisional permit.

What is the difference between 410 IAC 5.2-8-1(a)(5) and 410 IAC 5.2-8-1(b)(2) in the licensing requirements for nuclear medicine technologists? ANSWER: The distinction between the two statements is whether the individual is performing a nuclear medicine procedure or merely administering a radiopharmaceutical for a procedure that will be performed by a nuclear medicine technologist at a later time.

During the comment period on the proposed rule, a few comments were received about the administration of radiopharmaceuticals. Some nuclear medicine procedures require the injecting of a radiopharmaceutical 24-48 hours prior to the actual study. At some facilities, the nuclear medicine technologist or pharmacist will order the radiopharmaceutical which is then delivered to and administered by the physician's office or another provider. Generally in these situations the radiopharmaceutical is being administered by the patient's physician office or local hospital. The comments were that this practice eliminates the need for the patient to make two trips to the nuclear medicine department which in some cases may require significant travel for the patient. The intent of the rule was to allow a radiopharmaceutical to be administered by a non-nuclear medicine technologist under the authority of a physician. The intent was that the individual may not do any part of the nuclear medicine procedure other than the administration of the radiopharmaceutical. Without this provision in the rule, an individual administering a radiopharmaceutical would have considered to be part of the "procedure" which would have required the individual to be a licensed nuclear medicine technologist.

I am a Medical Imaging Supervisor. If I hire a new radiologic technologist that has completed their education and training and has passed the ARRT examination, can they work unsupervised while waiting for the ISDH License to be received in the mail? ANSWER: A graduate from a radiologic technologist educational program may be employed as a radiologic technologist and perform any procedure that is within the

scope of a radiologic technologist and in which the individual is appropriately trained. A board-eligible graduate may work alone following graduation. Whether an individual has been licensed may be determined by checking at <https://extranet.in.gov/WebLookup/Search.aspx>

We will require all individuals taking radiographs to have either a license or permit by July 1, 2007. If the graduate has passed the ARRT examination by July 1, the individual will be eligible for a radiologic technologist license. If the graduate has not passed the ARRT examination by July 1, the individual must obtain a student permit. The student permit is effective up through six months after the date of graduation to allow adequate opportunity to pass the registry examination. As a graduate, the student permit allows the individual to perform any procedure within the scope and training of the graduate.

How far in advance can someone renew their license on-line?

ANSWER: Currently, it is set as 75 days out from their expiration date.

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.

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.

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.

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.

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.

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.