



Board of Medical Imaging and Radiation Therapy

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Self-Contained, Cabinet-Style Specimen X-Ray Systems

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Position Statement

It is the position of this the Board of Medical Imaging and Radiation Therapy that Cabinet-Style Specimen X-Ray Systems are *radiation-producing equipment used for the purpose of medical imaging or radiation therapy*. KRS 311B.090 (1) states that "No person shall engage or attempt to engage in the operation of radiation-producing equipment or the administration of ionizing radiation for the purpose of medical imaging or radiation therapy in Kentucky unless licensed in accordance with the provisions of this chapter." Therefore, individuals operating Self-Contained, Cabinet-Style Specimen X-Ray Systems must be licensed by the board. Thus, with the exception of licensed practitioners of the healing arts, the operator of a self-contained, cabinet-style specimen x-ray system shall be a medical imaging technologist actively licensed in the state of Kentucky.

Topic Discussion:

The marketing of new digital specimen x-ray systems to diagnose the correct tissue excision during a biopsy has prompted the question of who may operate these portable self-contained x-ray cabinets. The systems are designed to be used in the operating room or procedural room and marketed as "no additional x-ray shielding required" with "no specialized x-ray knowledge needed to operate". The board has reviewed available product information, applicable Kentucky Regulatory Statutes and Kentucky Administrative Regulations and is issuing this position statement.

Board Authority:

The Board of Medical Imaging and Radiation Therapy is authorized by KRS 311B.010 to 311B.190 to regulate an operator of a source of radiation other than a licensed practitioner of the healing arts.

Applicable Statutes and Regulations:

311B.010 Legislative policy and intent.

(1) It is the declared policy of the General Assembly of Kentucky that the practice of medical imaging, radiation therapy, and related occupations should be regulated and controlled as provided by this chapter and by the administrative regulations of the board in order to protect and safeguard the health and safety of the citizens of the Commonwealth of Kentucky.

(2) Prior to July 12, 2012, the Cabinet for Health and Family Services has exercised effective oversight over the fields of medical imaging and radiation therapy, but it is the intent of the General Assembly that, as of July 12, 2012:

(a) These professions shall be governed by a peer-reviewed, practitioner-based body; and

(b) The board as established in this chapter is the best means to carry out this purpose.

311B.090 Restrictions on unlicensed persons -- Application of chapter.

(1) No person shall engage or attempt to engage in the operation of radiation-producing equipment or the administration of ionizing radiation for the purpose of medical imaging or radiation therapy in Kentucky unless licensed in accordance with the provisions of this chapter.

(2) This chapter shall not apply to any individual licensed in the Commonwealth of Kentucky as a licensed practitioner of the healing arts, any student enrolled in an approved educational program in medical imaging technology or radiation therapy, or any employee of the federal government engaged in the performance of official duties within the state.

Self-Contained, Cabinet-Style Specimen X-Ray Systems

There are multiple self-contained, cabinet-style specimen x-ray systems available in the market at this time. The systems are being specifically marketed for x-raying tissue specimens at the time of surgical excision of core tissue and stereotactic biopsy specimens. These systems are radiation producing machines designed to confirm the success of the tissue excision by visualizing that the abnormalities seen on imaging exams performed prior to the procedure are within the excised tissue. The images produced by these machines may be interpreted and used to assist in the treatment of a patient. KRS 311B.090(1) restricts operators of radiation-producing equipment or the administration of ionizing radiation for the purpose of medical imaging or radiation therapy to individuals licensed by the board. Since the self-contained, cabinet-style specimen x-ray system is radiation-producing equipment, the operator must comply with KRS 311B.090.