



MEMORANDUM

To: KBMIRT Licensees
From: Elizabeth Morgan, Executive Director
Date: April 16, 2026
Re: Temporary Student Radiography License

The Board recently amended several administrative regulations to provide a pathway for individuals that are currently enrolled in an accredited radiography program, have completed at least fifty (50) percent of the program, and have established employment at a health care facility with appropriate supervisory personnel. An active Temporary Student Radiography License authorizes the licensee to perform static x-rays while under the supervision of a licensed Radiographer that is immediately available and physically present within the department. The scope of practice is further limited by specifying that the Temporary Student Radiography licensee shall not perform bedside radiography or fluoroscopy procedures, nor submit x-ray images for interpretation unless approved by a licensed Radiographer. Additional information about the license and how to apply is available on the website: kbmirt.ky.gov

Please be advised: Individuals that are not licensed by the Board are prohibited from operating or manipulating radiation-producing equipment for medical imaging or radiation therapy.

Only a licensed medical imaging technologist, licensed temporary radiography student, a licensed practitioner of the healing arts, as defined by KRS 311B.020(8), or other licensed professional practicing within their scope in accordance with KRS 311B.090(4), may manipulate such equipment. Manipulating equipment includes, but is not limited to:

- Moving the imaging table, tube, or Bucky tray
- Operating the imaging console
- Selecting kVp or mAs
- Making an exposure

Any form of manipulation of radiation-producing equipment when the machine is in an operable state—whether or not an exposure is made—falls under this restriction.

Unlicensed practice is a violation of:

- KRS 311B.090(1)
- KRS 311B.100(1)
- KRS 311B.150(2)

Violations may result in disciplinary action, including fines, against both the individual and the facility.

Additionally, per 201 KAR 46:030, Section 2, *students may not be employed to operate radiation-producing equipment or administer ionizing radiation for medical purposes in Kentucky unless they hold an active Temporary Student Radiography License pursuant to 201 KAR 46:045.*

Exception: Students enrolled in Board-approved educational programs are exempt from licensure only *while actively engaged in clinical training as part of that program* in accordance with KRS 311B.090(2).

Finally, under KRS 311B.150(4), failure to report unlicensed practice or other illegal activity to the Board constitutes a separate violation.

Facilities and supervisors are expected to ensure full compliance with these regulations. Any questions regarding the scope of permissible student activities outside the clinical training should be directed to the Board for clarification.