



American Society of Radiologic Technologists

NC Radiation Protection Commission
c/o Nadine Pfeiffer
Rule Review Manager
North Carolina Department of Health and Human Services
809 Ruggles Drive
2701 Mail Service Center
Raleigh, NC 27603

Submitted via email to DHSR.RulesCoordinator@dhhs.nc.gov

Re: Proposed Rules of Chapter 10A NCAC 15, Radiation Protection

Dear NC Radiation Protection Commission members,

The American Society of Radiologic Technologists represents more than 156,000 medical imaging technologists and radiation therapists across the nation, including 115 nuclear medicine technologists in North Carolina. Our main mission as an organization is to advocate for patient safety by ensuring that only technologists who have achieved nationally recognized standards in education and clinical competencies are performing diagnostic and therapeutic procedures involving ionizing and nonionizing radiation.

As the premier association for the medical imaging and radiation therapy profession, ASRT applauds your regulatory effort to include ARRT and NMTCB certification for nuclear medicine technologists under 10A NCAC 15 .0307. By requiring nuclear medicine technologists to hold a credential through a nationally recognized credentialing organization, North Carolina is taking a critical step to ensure North Carolinians receive safe, high quality accurate care. As such, ASRT is encouraged by the requirement of the American Registry for Radiologic Technologists and/or the Nuclear Medicine Technology Credentialing Board's nuclear medicine credential for nuclear medicine technologists in the state.

ASRT appreciates your commitment to providing patients' access to quality health care services that only individuals that meet national education and clinical standards can provide and looks forward to working with you in the future to achieve this goal. Please feel free to contact me at mcheck@asrt.org or 800-444-2778; Ext 1314 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "M Check". The signature is stylized, with the first letter 'M' being large and the last name 'Check' written in a cursive-like script.

Meredith A. Check, MPP
Manager of Government Relations and Public Policy
American Society of Radiologic Technologists