



October 08, 2025

Ms. Shanah Black,
DHSR Rule-Review Manager
Edgerton Building
809 Ruggles Drive
Raleigh, NC 27603

**Re: ARRT Comments Regarding Proposed Readoption/Amendment Repeal of
Radiation Protection Commission Rules 10A NCAC 15 .0601-.0608, .010-.0611**

Dear Ms. Shanah Black,

The American Registry of Radiologic Technologists (ARRT) is a national, voluntary certification organization that develops and administers requirements to assess the qualifications of individuals in medical imaging and radiation therapy. It was founded in 1922 and currently registers more than 360,000 individuals as Registered Technologists (R.T.s) in 15 disciplines, including over 12,00 Radiologic Technologists in North Carolina. It is the mission of the ARRT to promote high standards of patient care by recognizing qualified individuals in medical imaging, interventional procedures, and radiation therapy. ARRT has proudly credentialed Radiologic Technologists for over 100 years.

ARRT has reviewed Proposed Readoption/Amendment Repeal of Radiation Protection Commission rules 10A NCAC 15 .0601-.0608, .0610-.061. ARRT has identified (1) recommended changes and (1) additional small correction. Details are as follows:

1. 10 NCAC 15 .0604, Operator Requirements, Item (j), ARRT recommends the inclusion of language that would also recognize Nuclear Medicine Technology Certification Board's NMTCB(CT) certification as acceptable as Operator Requirements for Computed Tomography.
2. 10 NCAC 15 .0604, Operator Requirements, Item (k)(1)(A) correct the Bone Densitometry certification from (DB) to (BD).

Thank you for your review and willingness to consider implementing these changes. Please do not hesitate to contact me at (651) 687-0048, ext. 3121, if I can provide further assistance.





THE AMERICAN REGISTRY OF RADIOLOGIC TECHNOLOGISTS®

Sincerely,

A handwritten signature in black ink that reads 'Liana Watson'.

Liana Watson, DM, R.T.(R)(M)(S)(BS)(ARRT), RDMS, RVT, FASRT, CAE
CEO

cc: Mark Payne, Director, Health Service Regulation
Emery Milliken, Deputy Director, DHHS
Raj Premakumar, Assistant General Counsel, DHHS
Denise Cloninger, Radiation Protection Section
Louis Brayboy, Section Chief, Radiation Protection Section
Dr. Carmine Plott, PhD, CHP, Chair, N.C. Radiation Protection Commission
Regina Kissinger, Radiation Protection Section

