



American Society of Radiologic Technologists

Shanah Black
Rule-Review Manager
Division of Health Service Regulation
809 Ruggles Drive
Raleigh, NC 27699
DHSR.RulesCoordinator@dhhs.nc.gov

October 8, 2025

Dear Ms. Black,

The American Society of Radiologic Technologists represents more than 155,000 medical imaging and radiation therapy professionals across the nation, including 5,836 in North Carolina. Our main mission as an organization is to advance and elevate the medical imaging and radiation therapy profession and enhance quality, safe patient care. With that mission in mind, the ASRT provides the following recommendation on the proposed readoption of 10A NCAC 15.0604 with substantive changes.

Recommendation: For 10 NCAC 15 .0604.(j) to read as follows:

- (1) individuals who operate a CT radiation machine for diagnostic imaging shall hold an active Computed Tomography (CT) registration with the ARRT; or
- (2) **hold an active (CT) credential with the Nuclear Medicine Technology Certification Board (NMTCB); or**

(23) shall be enrolled in an accredited educational program and under the personal supervision of an individual who meets the requirements of Subparagraph (1) of this Paragraph.

Reasoning: Both the ARRT (CT) and NMTCB (CT) are nationally recognized as appropriate credentials for individuals to perform diagnostic computed tomography. The inclusion of the Nuclear Medicine Technology Certification Board Computed Tomography credential will fill a critical gap in the proposed regulations. Recognizing both the ARRT (CT) and NMTCB (CT) under 10 NCAC 15 .0604.(j)(1) supports workforce mobility while ensuring North Carolinians receive safe, high-quality care.

ASRT appreciates your commitment to providing patients' access to quality health care services that only individuals who 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, appearing to read "M Check". The signature is stylized with a large, bold "M" and a cursive "Check".

Meredith A. Check, MPP

Director of Government Relations and Public Policy

American Society of Radiologic Technologists