

## **221.202. Equipment requirements.**

**(a) Accreditation. All diagnostic CT x-ray systems shall be accredited by an accrediting organization recognized by the Department.**

This is the most effective regulation ever proposed by the DEP.  
It will have a dramatic, positive, impact on patient health and safety.  
It is the DEP equivalent of the MQSA.

With one sentence, this regulation establishes;

Credential requirements for radiologists, technologists and physicists,  
including Continuing education requirements and certification maintenance,  
Phantom Image quality standards,  
Reference Dose Levels,  
Quality Assurance requirements  
including adherence to a QA program with specified components, frequencies,  
methodology, and performance criteria,

and beyond this, it requires all facilities to comply with a standard for clinical images.

Moreover, these have been established by a expert consensus of Radiologists, Physicists,  
Technologists and state representatives.

An added bonus is that the requirements and standards will undergo constant upgrade to deal with  
changes in technology and practice.

Nothing more is needed.\*

This regulation is analogous to

§ 221.13 (c) Mammography facilities shall comply with 21 CFR Part 900,

where the DEP established similar performance standards for all mammography facilities, based on  
compliance with a single other statute.

Adopting this establishes global practice standards for the above components.

I urge the DEP to use this as the sole statute for establishing QA, credentials, training, and all related  
practices.

\*Realistically, there is still a need to address facility requirements, recordkeeping, etc.

	ACR		JC	DEP		
	Annual Physicist	Daily Technologist	Annual Physicist	Annual Performance Evaluation Physicist	Annual Calibration Physicist	Quarterly Performance Evaluation
Procedure Review	X		X	X		X
Scout Prescription Accuracy	X		X		X	
Alignment Light Accuracy	X		X	X	X	
Image Thickness	X		X		X	
Table Travel Accuracy	X		X		X	
Radiation Beam Width	X		X			
Low Contrast Performance	X	X(NOISE)	X	X	X	X
Spatial Resolution	X		X	X	X	X
CT# Accuracy	X	X(H2O)	X	X(H2O)	X	X(H2O)
Artifact Analysis	X	X	X		X	
CT# Uniformity	X		X		X	
Dosimetry	X		X	X	X	
Soft Copy Performance	X	MONTHLY			X	
Hard Copy Performance		WEEKLY			X	
Half Value Layer				X		
Distance Accuracy				X		
mR/mAs				X		
Alignment of table to Gantry					X	
Table Tilt?					X	
Gantry Tilt					X	
CT# Linearity					X	