

June 1, 2015

Joyce Marshall  
The Joint Commission  
Standards and Survey Methods  
Diagnostic Imaging Services Field Review  
One Renaissance Blvd.  
Oakbrook Terrace, IL 60181

**RE: The Joint Commission Proposed Standards Changes Related to Diagnostic Imaging**

Ms. Marshall:

The Society of Nuclear Medicine and Molecular Imaging (SNMMI) would like to thank The Joint Commission (TJC) for the opportunity to comment and work with you on the Proposed Standards Changes Related to Diagnostic Imaging. As you know, SNMMI is a nonprofit scientific and professional organization that promotes the science, technology and practical application of nuclear medicine and molecular imaging. With 18,000 members worldwide, SNMMI represents nuclear and molecular imaging professionals, all of whom are committed to the advancement of the field.

SNMMI would like to express our gratitude with TJC's willingness to work with us through every step in the revision process. Through your readiness to attend conference calls and accept comment letters, TJC has demonstrated its commitment to ensuring the best possible revisions to diagnostic imaging services. Furthermore, SNMMI is extremely pleased with TJC's recent edits to the proposed revisions, which were a direct result of our strong collaborative effort. Specifically:

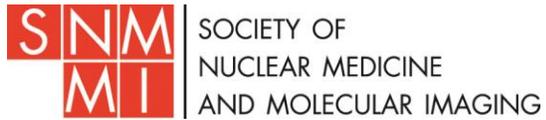
*HR .01.02.05 EP 19*

*Technologists who perform diagnostic computed tomography (CT) exams have advanced-level certification by American Registry of Radiologic Technologists (ARRT) or the Nuclear Medicine Technology Certification Board (NMTCB) in computed tomography or one of the following qualifications:*

- *State licensure that permits them to perform diagnostic CT exams and documented training on the provision of diagnostic CT exams or*
- *Certification and registration in radiography by ARRT and documented training on the provision of diagnostic CT exams or*
- *Certification in nuclear medicine technology by ARRT or NMTCB and documented training on the provision of diagnostic CT exams*

*Note 1: Effective January 1, 2018, all technologists who perform diagnostic computed tomography (CT) exams will be expected to have advanced-level certification in computed tomography.*

*Note 2: This element of performance does not apply to CT exams performed for therapeutic radiation treatment planning or delivery, or for calculating attenuation coefficients for nuclear medicine studies.*



SNMMI remains grateful for your availability and assistance throughout this process. As always, SNMMI is ready to discuss any further questions and comments with The Joint Commission. In this regard, please contact Susan Bunning, Director, Government Affairs, by email at [sbunning@snmmi.org](mailto:sbunning@snmmi.org) or by phone at 703-326-1182.

Respectfully Submitted,

April Mann, MBA, CNMT, NCT, RT(N), F  
President, SNMMI-TS