


**ARKANSAS DEPARTMENT OF HEALTH  
RADIATION CONTROL**  
5800 W. 10<sup>th</sup> Street  
Little Rock, AR 72206

**MEMORANDUM**

TO: Bernard Bevill, Section Chief   
FROM: Adelia Oldenbroek, X-ray Program Supervisor  
DATE: April 24, 2025  
SUBJECT: X-ray Image Retention

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Pursuant to the Arkansas Board of Health Rules for Hospitals and Related Institutions in Arkansas, Revisions effective date: June 17, 2024, Section 20.A.19 "Actual X-ray film shall be retained for five years."

Pursuant to 21 CFR 900.12I(4)(i)

Facilities must maintain the original mammograms and mammography reports in a permanent medical record of the patient for the longest of the following:

- a period of not less than 5 years,
- a period of not less than 10 years if no additional mammograms of the patient are performed at the facility, or
- a period, if longer, mandated by State or local law.

Facilities must implement policies and procedures to minimize the possibility of loss of these records. The original mammograms must be retained in retrievable form in the mammographic modality in which they were produced. They cannot be produced by copying or digitizing hardcopy originals.

Additionally, in regard to image retention at facilities that perform routine radiography, the X-ray Program colleagues propose the following ***guidelines***.

- 1) Retain all images for 5 years.
- 2) Retain all images on joint replacements for 10 years.
- 3) Retain all images on minor children until the time of their eighteenth birthday.
- 4) As to the retention of patients who are deceased, this should be left to the discretion of the facility administrator and/or physicians.