X-Ray Regulatory Guide for Podiatry Facilities



STATE OF WISCONSIN

DEPARTMENT OF HEALTH SERVICES

Division of Public Health

Bureau of Environmental and Occupational Health

Radiation Protection Section

PO Box 2659

Madison, Wisconsin 53701

P-01639E (04/2017)

# SAMPLE RADIATION SAFETY POLICY

All Registrants are required to have a radiation safety program and a written radiation safety policy. This sample policy is to help a registrant include in the written safety policy the minimum standards to meet Wis. Admin. Code ch. DHS 157 safety requirements. This is not an all-inclusive document. Additions and adjustments my need to be made to meet your current radiation uses.

## Changes in Registration

If there are changes in the registration, for this facility, such as change of address, responsible party new equipment, etc., written notice must be sent to the department within 30 days of the change. Change of ownership requires a new registration with full fees paid by the new owner. Addition of new equipment and/or the replacement/removal of old equipment also needs to be reported to ensure your annual registration fees are accurate. Changes to the registration information may be faxed to 608-267-4799 or mailed to Division of Public Health, Radiation Protection Section, PO Box 2659, Madison, WI 53701-2659. If you would like to send this electronically please call 608-267-4782.

Current contact information for the department is available at the following web address: <https://www.dhs.wisconsin.gov/radiation/xray/index.htm>

# OPERATING and SAFETY PROCEDURES

## Operating and Safety Procedures

This policy establishes procedures that will minimize radiation exposure to employees. The policy statements are provided to comply with regulations enforced by the Wisconsin Department of Health Services, Radiation Protection Section. The regulations require that each x-ray facility and all x-ray devices at that address be registered with the department and pay annual renewal fees.

The registrant MUST designate a person responsible for oversight and annual review of these procedures. This person is often referred to as the Person-in-Control or the Radiation Safety Officer (RSO). This individual has the responsibility and authority for assuring safe radiation practices and serves as the contact person between this facility and the department. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

## Posting Notices, Instructions, and Reports to Workers

Employees must be familiar with the "Notice to Employees" document which needs to be posted in an employee accessible area.

The location of written operations and safety procedures and location of where the regulations can be accessed is to be written in the lined box at the top of the “Notice to Employees” sign.

The certificate of registration, issued annually at the time of registration renewal, the operating and safety procedures and any notices of violations involving radiological working conditions are located in/at the radiology department. Specify the area in your procedures

The practice is required to provide staff access to the regulations. Your rights and obligations as a radiation worker are found in § DHS 157.88.

A copy of the Notice to Employees is available at our website <https://www.dhs.wisconsin.gov/radiation/index.htm> or by calling the Radiation Protection Section at 608 267-4782.

# OPERATOR SAFETY

## Training Requirements for Operators of X-ray Machines

All operators of x-ray machines must have completed a Podiatric imaging training course as outlined in the Department of Safety and Professional Services regulations. The Podiatry X-ray Machine Operator bust also document training that includes:

1. Operation of the equipment safely, i.e. adequate collimation, procedures for mobile/portable x-ray units
2. Selection of proper technique factors (time, mA, or mAs and kVp)
3. Positioning the patient and equipment properly
4. Proper image processing
5. The use of personal protective equipment (apron, gloves, thyroid collar, etc.)
6. The use of fluoroscopic equipment if available/used on site (for detailed training in fluoroscopy see the [X-Ray Regulatory Guide, P-01639E](https://www.dhs.wisconsin.gov/publications/p01639.docx))

All operators shall acknowledge receipt of this training by signing an Operation and Safety Procedure Verification form located in or nearby the location of the x-ray device. (Wording for an Operation and Safety Procedure Verification form can be found in **Appendix B of the** X-Ray Regulatory Guide**).**

Training documentation will include a copy of the operating and safety procedures, as well as specific equipment use training, date(s) of the training, a list and signatures of staff in attendance and the qualifications of the person providing the instruction shall be located in or nearby the location of the x-ray device. (Wording for a Training Documentation form can be found in **Appendix C** of the X-Ray Regulatory Guide).

X-ray machine operators need to be trained on each piece of x-ray equipment they will be using. Although they may have used similar equipment in the past, each unit could have unique operating characteristics.

## Individual Radiation Monitoring Requirements (DOSIMETRY)

In a podiatry setting where the doctor/owner is the only x-ray machine operator, monitoring devices are not required. Any associate doctors and/or employees who are likely to receive a dose from occupational exposure to radiation in excess of 5 mSv (500 millirem) in a year must use an individual monitoring device.

Your procedures should indicate whether the site has or has not issued dosimetry to staff.

## Ordering of X-ray Exams

No x-ray exams shall be taken unless ordered by a licensed healing arts practitioner. DHS 157 defines a licensed practitioner as a chiropractor, dentist, physician, podiatrist, physician assistant, nurse practitioner, radiologist’s assistant or physical therapist licensed in the state of Wisconsin. This may be a verbal order so long as there is a corresponding signed order entry in the patient chart or computer file. Orders require the signature of the licensed practitioner.