

COMPLIANCE CORNER

Radiology Compliance in the Veterinary Hospital

by Grant Miller, DVM, CVMA Director of Regulatory Affairs

Following the best radiation safety practices benefits patients and veterinary professionals. Within the veterinary practice, the radiology area is policed by the California Veterinary Medical Board (VMB), the Department of Industrial Relations Division of Occupational Safety and Health (Cal/OSHA) and the California Department of Public Health, Radiologic Health Branch. All entities enforce various sections of the California Health and Safety Code as well as Title 17 from the California Code of Regulations. Inspections by each entity are either complaint driven or conducted randomly. Inspections can occur without prior notice.

During inspections, the agencies will look for the following:

Mandatory Postings

1. “Caution- X-Ray Area” Sign: A sign needs to be posted in a conspicuous area near the X-Ray unit. This can be adjacent to the entrance of the room or near the X-Ray unit if the unit is not kept in a separate room. This sign fulfills a state safety requirement by notifying people that they are in the proximity of a radiation area.
2. [Title 17 Posting](#): This set of radiation regulations must be either posted in the X-ray area, or needs to be stored in a location designated by a posted notice in the X-ray area. This poster fulfills the state requirements, per Title 17, detailing radiation safety rules for radiographic and fluoroscopic units.
3. 10 CFR 20: This set of radiation regulations is [Division 10, Chapter 20 of the Code of Federal Regulations](#) pertaining to standards of protection against radiation. Along with Title 17, 10 CFR 20 must be posted in the X-Ray area or must be stored in an accessible location designated by a posted notice in the X-Ray area. For mobile or ambulatory practices, this publication should be kept in a binder and carried in the vehicle for staff to review.
4. [Form RHB-2364 Notice to Employees](#): This form must be posted in a conspicuous location within the X-Ray area. It fulfills a state safety requirement detailing standards for protection against radiation, which apply to both employees and employers.
5. Radiation Safety Instructions: This form must be posted in a conspicuous location within the X-Ray area (preferably near the control panel for the X-Ray unit). This posting fulfills a state safety requirement and offers detailed information on applicable safety practices and procedures in the radiation area.
6. Radiation Emergency Procedures: need to be written and posted according to the specifics of the practice. They include what to do in the event of a radiation emergency, including emergency shut-down procedures for the unit. Radiation Emergency Procedures must be posted in the X-Ray area, preferably near the X-Ray control unit.

(For items 2-5 above, for mobile or ambulatory practices, these publications should be kept in a binder and carried in the vehicle and should be available to staff for review.)

Mandatory Documentation

1. Radiation Safety and Compliance Policy for your Practice: This document serves as a basic policy for your practice and should reflect the specific radiation safety practices of your business. No two policies will be identical since no two veterinary practices are configured or run the same way.
2. Radiation Safety Training and Documentation: Practices must be able to demonstrate that all employees (other than veterinarians or RVTs) who assist in the taking of radiographs have radiation safety training. As an option to fulfill this requirement, the [*Radiation Safety Manual with Radiation Safety Quiz*](#), is available through the VMB. This manual, if used to fulfill the safety training requirement, should be reviewed with all applicable staff. The included quiz can be used as proof of radiation safety training. Completed quizzes should be kept in a dedicated file for inspection upon request. These records may not be kept in an employee file that includes financial information. The manual and quiz should be kept in a location where staff can access it. For fixed premises, this can be in a designated drawer or file, for mobile or ambulatory practices, this can be in a binder that is carried in the vehicle.

Should you choose to develop your own Radiation Safety and Protection Program, it should follow the guidelines set forth in the [*Radiation Safety and Protection Program Requirement Guidance*](#) published by the Radiologic Health Branch. You are not required to keep all of the components of your Radiation Safety and Protection Program in one consolidated document. However, all components do have to be documented and identified as being part of the Radiation Protection Program. Records of the Radiation Safety and Protection Program content, implementation, and audits must be maintained and made available for inspection. Whatever program you choose to develop should be reviewed annually to ensure that it remains compliant.

3. Separate radiology log form (optional): California state law requires that a permanent log of each radiographic study be maintained for each patient. While this may be done in each patient's medical record, some find it useful to compile all studies in a separate log.
4. All radiography units must be registered with the California Department of Public Health, Radiologic Health Branch. Online registration information and forms can be accessed at: <http://www.cdph.ca.gov/certlic/Pages/RHB-RadiationMachineRegistration.aspx>. Completed forms should be mailed to the California Department of Public Health - Radiologic Health Branch, MS 7610, Registration Unit P.O. Box 997414 Sacramento, CA 95899-7414.

Additional Recommendations

Beyond these requirements, the California Department of Public Health, Radiologic Health Branch recommends that licensees develop a radiation safety program specific to his or her premise. That program may include the following:

- Periodic X-Ray and radiation safety meetings with staff. In these meetings, it is a good idea to have printed materials and a staff sign-in sheet to prove attendance.
- Dosimeter badges: although not specifically required, badges are strongly recommended since you are required to be able to report exposure limits of employees. Occupational exposure should be recorded regularly (at least quarterly and preferably monthly). Also, law requires that an annual report of occupational exposure be provided to all individuals who are being monitored. A dosimeter badge vendor list may be accessed (see link at CVMA.net).
- Routine inspection of radiation safety equipment (e.g., gloves, gowns, thyroid shields) for cracks or creases.

If you have any questions about radiation regulations and your obligations as a licensee, please contact Dr. Grant Miller, Director of Regulatory Affairs at (916) 649-0599 or gmler@cvma.net or visit www.cvma.net and use the search function to find information on radiation regulations.

CVMA Radiation Compliance Kit

The CVMA offers a complete Radiation Compliance Kit at a discounted price for members (member price of \$90.00 + tax, non-member price \$130.00 + tax). The kit contains all required postings and documentation necessary to keep you compliant. To purchase the kit or for more information on radiation compliance, visit www.cvma.net and click on the products tab. On the left hand side of the screen, click “Radiation Compliance Kit.”