



Statewide Changes to X-Ray Law: They Apply NOW

By Ed Enriquez DDS, MAGD

In February 2007, Pennsylvania's Department of Environmental Protection (DEP) requested technical assistance in determining how to ensure that radiation-related injuries will not occur during x-ray procedures, including in the dental office. The following professional organizations submitted comments and recommendations on modifying CE guidelines to limit effects of radiation exposure to patients:

- Pennsylvania American College of Cardiology
- University of Pennsylvania Environmental Health and Radiation Safety Department
- Pennsylvania Dental Association
- Fox Chase Cancer Center
- Medical Imaging Radiation Science Department of Mount Aloysius College

After the DEP evaluated responses and determined needs, The PA Radiation Protection Act of July 1984 was amended and approved by the governor to include the 25 PA Code Radiological Health Regulation (25 PA Code Chapter 215-240), Document No. 291-4200-001. Included in TITLE 25 PA Code 221.11, the new policy, "Medical X-Ray Procedures Operator Training Guide," became effective September 1, 2009. It supplements existing requirements and applies to anyone who operates x-ray producing equipment.

How This Will Affect You

As practicing dentists, we will continue mandating all dental staff members have radiation/x-ray certification. In

addition to the commonwealth's dental law regulatory requirements, however, every dental office subject to PA DEP inspection of their radiation-producing equipment now has the following requirements:

- A. All registrants (dentists) must demonstrate a minimum of four contact hours of training from topics in Appendix A.
- B. All operators must demonstrate two contact hours or four continuing education credits every four years in topics from Appendix A, or complete in-service training in required/related topics, or successfully pass an administered test in required/related topics.
- C. Documentation of continuing education requirements must be certified by a professional organization accepted by the DEP Bureau of Radiation Protection.
- D. Appendix A: Individuals shall be trained and competent for operating x-ray equipment in the following subjects:
 - Basic radiation properties
 - Units of measurement
 - Sources of radiation exposure
 - Methods of radiation protection
 - Biological effects
 - X-ray equipment
 - Imaging recording and processing
 - Patient exposure and positioning
 - Procedures
 - Quality assurance
 - Regulations
- E. Acceptable organizations through which to obtain continuing education or contact hours include the American Board of Radiology, American Regis-

try of Radiology Technologist, DANB, ADA-CERP, American Chiropractic Registry of Radiology Tech., American Society of Podiatric Medical Assistants, and International Society of Clinical Densitometry Registry.

What You Must Know and Prepare For

- The dental profession falls under "Low Risk Exposure."
- Dentist will need four contact hours (DEP defines as either participation hours or in-office training) every four years.
- Dental staff will need two contact hours or four CE credits every four years.
- DEP inspectors will request documentation of completion of CE hours. This will occur during your radiation equipment inspection.
- Should your staff or dental office not have the required documents of acceptable CE hours, a letter of non-compliance will be issued by DEP mandating you complete the requirements within 30 days. DEP can impose civil penalties to the individual or dental facility not in compliance.

You can request a copy of the DEP policy and guideline summarized in this article, "DEP Technical Guidance of Medical X-ray Procedures Operator Training Guide 25 Pa Code 221.11 No. 291-4200-001," by calling the PA DEP Bureau of Radiation Protection at 717-787-3720 or writing to the DEP Bureau of Radiation Protection, P.O. 8469, Harrisburg, PA, 17105-8469.