



Conference of Radiation Control Program Directors, Inc.

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COVID-19 Response Guidance to State and Local Radiation Control Programs

Topic: Medical Radioactive Material License Compliance and COVID-19

There is currently an outbreak of respiratory disease caused by a novel coronavirus. The virus has been named "SARS-CoV-2" and the disease it causes has been named "Coronavirus Disease 2019" (COVID-19). On January 31, 2020, HHS issued a declaration of a public health emergency related to COVID-19 and mobilized the Operating Divisions of HHS. On March 13, 2020, the President declared a national emergency in response to COVID-19. State emergency/public health emergency declarations have been issued for every state and U.S. territory, as well as the District of Columbia

SARS-CoV-2 has demonstrated the capability to spread rapidly, leading to significant impacts on healthcare systems and causing societal disruption. The potential public health threat posed by COVID-19 is high, both globally and to the United States. To respond effectively to the COVID-19 outbreak, appropriate clinical management and infection control in conjunction with implementation of community mitigation efforts are critical.

The Conference of Radiation Control Program Directors (CRCPD) recognizes that some of the requirements in our Suggested State Regulations may present both significant infectious disease risk as well as an administrative burden to the regulated community, many of whom are actively engaged in the COVID-19 public health response. In order to avoid further overwhelming medical facilities at the frontlines of this pandemic attack, CRCPD provides the **attached guidance** for state Radiation Control Programs to consider in their response. CRCPD promotes and fosters uniformity of radiation control laws and regulations by publishing a set of suggested state regulations upon which state regulations are based. However, these are voluntary recommendations and allow for state-specific modifications.

CRCPD also recognizes that each state has different authorities, laws, and interests to consider in determining which, if any, regulatory action should be implemented in their response to the COVID-19 pandemic. Moreover, during the state emergency/public health emergency, specific executive actions may have been executed by the appropriate statutory authority. Careful consideration should be applied to the implementation of this guidance to ensure actions are consistent with legal authority as modified by emergency actions in accordance with state law.

Jeffrey D. Semancik
Chairperson

Medical Radioactive Material License Compliance and COVID-19

The (Insert State) Department of XXX, Radiation Section licenses facilities that utilize Radioactive Material, and is responsible for notifying the regulated community of radiation control changes.

The (Insert State) Radiation Regulations on radioactive material (RAM) and include various testing and notifications to be conducted to maintain compliance. The Radiation Section is aware that some facilities are limiting access to vendors (i.e., inspectors, qualified medical physicists (QMP), service company representatives) due to restrictions they have implemented because of COVID-19. Those prohibitions include restricting or barring access to medical physicists and contractors who conduct required surveys at regulated radioactive material licensees, which will result in a delay in conducting required physics surveys and calibrations. The inability to complete performance testing may lead to an undue backlog of equipment to be tested.

All quality control testing that is routinely performed by the facility personnel should continue to be performed. Any tests that are usually performed by a medical physicist but could be performed by the facility personnel should be conducted, and the results should be reviewed by the medical physicist.

In light of the COVID-19 pandemic, the Radiation Section is issuing the following guidance for licensees to ensure the continuity of radiation safety during COVID-19 related restrictions. This is a rapidly evolving situation and subject to change.

For additional information, contact the Radiation Section at XXXX.

RADIOACTIVE MATERIAL MEDICAL LICENSEE GUIDANCE. The following guidance is provided for the next 90 days, effective March XX, 2020.

RAM licensees:

- If the licensee *is not prohibited* by facility, local, state, or national governmental guidance or orders related to COVID-19 at the time a regulated task is required, then the licensee shall assume it must perform the task(s) in compliance with all regulations.
- Licensees should continue following the current regulations.
- If the radiation safety officer or other person responsible for completing a required regulated task is unable to perform his or her duties due to illness or governmental guidance or orders related to COVID-19, a licensee must make reasonable efforts to find another qualified individual who can timely perform the regulated task (for example, the on-site therapy physicist may be able to perform routine nuclear medicine tests if the diagnostic physicist is unable to enter the facility).
- All licensees must document any mitigating factors encountered during this time with Covid-19 indicated and make the documentation available at inspection. (Insert state/department) will consider documented extenuating circumstances when making final decisions regarding compliance actions.

Compliance with the following requirements is required at all times:

- **Reports of lost, stolen or missing radioactive sources**
- **Notification of incidents involving radioactive material**
- **Notification of exceeding annual dose limits**
- **Notification of medical events as described in current state regulations**

Direct your questions to:

- RAM Inspection & Rule Compliance:
- Incident or Medical Event reporting:
 - Initial reports:
 - Follow-Up reporting:
- RAM Licensing issues:
- X-Ray Inspection and Rule Compliance:
- Mammography (MQSA):
- X-Ray Registration issues:
- Notices of Violation: