



Conference of Radiation Control Program Directors, Inc.

Office of Executive Director ❖ 112 E Main Street ❖ Frankfort, KY 40601
Phone: 502/227-4543 ❖ Fax: 502/227-7862 ❖ Web Site: www.crcpd.org

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jeffrey.semancik@ct.gov
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[rmcburney@
crcpd.org](mailto:rmcburney@crcpd.org)

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

Topic: X-Ray Machine Physicist Surveys

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

Radiation (X-Ray) Machine Compliance and COVID-19 Template

The (Insert State) Department of XXX, Radiation Section registers facilities possessing radiation sources such as X-ray machines and is responsible for notifying the regulated community of radiation control changes.

The (Insert State) Radiation Regulations on X-ray machines 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 facilities, 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 registrants and 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.

X-RAY EQUIPMENT SURVEY GUIDANCE. The following guidance is provided for the next 90 days, effective APRIL XX, 2020.

The State will extend the annual medical physicist equipment survey windows as outlined below. Inquiries regarding extensions to federal or accreditation requirements should be directed to those entities. The State contact is XXXX.

Annual Medical Physicist CT and Fluoroscopy Equipment Surveys:

May be extended to be performed no later than 16-months from date of last equipment evaluation.

Surveys required following major repair or new installations may be delayed until such time as the physicist can enter the facility safely. The installation/repair report should be reviewed by the medical physicist. The installation/repair reports shall be maintained for review by the state.

For all surveys that do not meet the required timeline, the facility shall document the reason for the delay as related to the Covid-19 pandemic, including any specific site information. This documentation shall be maintained for review by the state.

Facilities needing a longer extension are asked to contact the State for further guidance and exemptions.

Medical Physicist X-Ray Therapy Equipment Calibration/Surveys:

Facilities needing an extension are asked to contact the State for further guidance. The State will evaluate these requests on a case-by-case basis.

Compliance with the following requirements is required at all times:

- Reports of lost, stolen or missing radiation devices
- Notification of exceeding annual dose limits
- Notification of medical events as described in current state regulations

Direct your questions to: (to be filled in by State Radiation Control Program)

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

Please check back regularly for updates.