

Radiographic Equipment Ownership Guide for Chiropractic Registrants

- 1. In order to assist DC registrants that own or operate a radiographic facility, while ensuring facility safety and safe operation of the X-ray equipment, the College of Complementary Healthcare Professionals of BC (CCHPBC) has developed this Radiographic Equipment Ownership Guide.
- 2. All DC registrants that own radiographic equipment must comply with the <u>Bylaws</u> Schedule 8 Section 2.0 Radiation Safety and Procedure by:
 - a) registering the X-ray equipment with the CCHPBC
 - b) de-registering the equipment with both the CCHPBC when no longer in use
 - c) maintaining a current Certificate of Radiation Safety (the Certificate)
 - d) annually or as updated, provide the CCHPBC with:
 - o the issue date and expiry date of the Certificate
 - o a copy of the Certificate (upload)
 - e) displaying the *Certificate on or near* the X-ray equipment, in a manner that is easily seen by patients receiving X-rays. The most recent certificate issued, *if expired*, must continue to be posted until replaced with a current certificate. X-rays must not be taken with an expired certificate posted in the facility.
 - f) display X-ray warning signs (Health Canada Safety Code 20, 4.2 (9))
 - g) complying with any *CCHPBC* Quality Assurance Committee programs for radiographic equipment.
- 3. All DC registrants who own, whether individually or in a partnership, any radiographic equipment must provide the *Certificate* to the *CCHPBC*
- 4. Other registrants such as clinic associate doctors and locum, student or temporary registrants <u>do not</u> need to provide X-ray registration information or the *Certificate* to the *CCHPBC*, since the facility owner is ultimately responsible for the radiation safety of a diagnostic X-ray facility. However, these registrants must ensure the equipment has a valid *Certificate* before operating it themselves.
- 5. If any DC registrant is operating radiographic equipment owned by a person or company other than a chiropractor, they should contact the College office.



- 6. DC registrants can register and de-register the X-ray equipment in the radiographic facility, verify the X-ray equipment and upload a copy of the Certificate by logging into the <u>Chiropractors Registrant Portal</u>.
- 7. It remains the responsibility of the DC registrant to ensure their Certificate is valid at all times.
 - a) **NOTE:** operation of radiographic equipment that does not have a valid Certificate is a breach of the Bylaws and WorkSafeBC Occupational Health and Safety Regulations. This could result in an investigation and penalties under the Health Professions Act (the HPA) s. 33 and an order to cease use of the equipment under HPA s. 35, in addition to separate WorkSafeBC assessments, penalties and fines.
- 8. Only a Shielding Consultant can assist in planning your radiographic facility.

Checklist for chiropractic owners of radiographic equipment

- 9. New and used radiographic equipment installation, modifications, changes, replacing or moving:
 - Installed by qualified persons
 - Adequate shielding installed
 - Equipment registered with the CCHPBC
 - Certificate of Radiation Safety uploaded to CCHPBC
- 10. At least every 3 years:
 - Survey of equipment by a Radiation Protection Surveyor
 - Certificate of Radiation Safety uploaded to CCHPBC
- 11. Key points:
 - Radiographic equipment that does not have a current and valid Certificate must NOT be operated
 - It is the responsibility of the chiropractor to ensure they possess a valid Certificate
 - A proper and complete exposure log must be maintained

Regulation and Authority

12. The *Chiropractic Regulation* permits chiropractors to "apply X-rays for diagnostic or imaging purposes, excluding X-rays for the purpose of computerized axial tomography". Along with this privilege comes many responsibilities including the assurance that the radiographic equipment is safe and operating correctly to best protect the public, patients, equipment operators and staff.



- 13. The authority for Radiation Guidelines is under <u>Work Safe BC Occupational</u>
 <u>Health and Safety (OHS) Regulations Part 7 Noise, Vibration, Radiation</u>
 <u>and Temperature</u>
 - a) <u>Division 3 Radiation Exposure</u>
- 14. Health Canada has issued Safety Codes for X-ray equipment:
 - a) Safety Code 20A X-Ray Equipment in Medical Diagnosis Part A: Recommended Safety Procedures for Installation and Use
 - o Typically for facilities with one standard X-ray unit.
 - o **NOTE**: This Safety Code is being revised but can continue to be used until a revised version is published by Health Canada.
 - b) <u>Safety Code 35: Safety Procedures for the Installation, Use and Control of X-ray Equipment in Large Medical Radiological Facilities</u>

There are many factors and variables that determine the requirement and applicability of Health Canada Safety Code 20A or 35. The *CCHPBC* is unable to provide a determination, therefore DC registrants that wish to operate any form of radiographic equipment should consult with a Radiation Surveyor prior to shielding and installation of the unit.

Responsibilities

- 15. The owner of the radiographic facility is responsible for ensuring the safety standards are met, including:
 - a) calibration and proper functioning of the X-ray unit,
 - b) patient safety typical acceptable radiation dose per view, gonadal shielding available, etc., and
 - c) safety of workers and the general public (both inside and outside of the facility).
- 16. A Certificate of Radiation Safety (the *Certificate*) is required at all times under *CCHPBC* <u>Bylaws</u> Schedule 8 Section 2.
 - a) The Certificate is valid for up to 3 years, excepting a 'Conditional' certificate issued for a 90-day period.
 - b) A DC registrant must NOT operate an X-ray unit without a current and valid *Certificate*, properly posted in the radiographic facility,
- 17. New radiographic equipment installation must be performed by the manufacturer or their authorized installer. The new equipment must be registered with CCHPBC and a Certificate must be uploaded to the CCHPBC.
- 18. Installation of used radiographic equipment should be performed by a qualified surveyor. The used radiographic equipment must be registered with the



CCHPBC and a new Certificate must be uploaded to the CCHPBC.

- 19. A Radiation Protection Survey is required when:
 - a) The tube is replaced
 - b) The equipment has been damaged or modified
 - c) The radiographic equipment is moved to a new office or within the existing office
 - d) There is an indication of an unusually high exposure of a worker to ionizing radiation
 - e) Specified in the radiographic equipment manufacturer's instruction
 - f) Used radiographic equipment is installed
 - g) The Surveyor will determine the need for issuance of a new Certificate of Radiation Safety
- 20. Shielding and installation plans are not submitted to the *CCHPBC*. A Shielding Consultant can advise on your specific requirements.
- 21. An owner must keep all plans and drawings for future reference by a Radiation Surveyor and provide the plans to the *CCHPBC or WorkSafe BC* upon request.
 - a) In planning your X-ray radiographic equipment facility, allowances should be made for possible future changes in any one or all the parameters such as increased operating kVp and workload, additional equipment and an increase in the degree of occupancy of the surrounding areas.
- 22. Records of Radiation Surveys must be retained by the registrant for a minimum of 10 years (WorkSafeBC 7.25(a)(i)) and made available to WorkSafeBC and workers.
- 23. All radiographic equipment must be registered by the owner(s) with the *CCHPBC* when installed and de-registered when sold or otherwise disposed of.
- 24. Any worker(s) involved with taking of X-rays (located anywhere inside the X-ray room for any reason when the X-ray equipment's exposure switch is pressed) must be provided with a PERSONAL dosimeter that is properly monitored. The dosimetry records must be maintained by the employer for the period that the worker is employed plus 10 years. The records must be made available to WorkSafeBC and the worker(s).
- 25. An accurate exposure log must be maintained. Sufficient detail must include Date, Patient Name, Views, Calipered Thickness, X-ray Technical Factors (kVp, mA, mAs/time), # of Exposures Taken including Rejects/Repeats, Comments, Dr.'s Initials. The exposure log is key information for the Surveyor, used in



- determining an estimate of potential exposures to workers and the general public both inside and outside the radiographic facility as applicable.
- 26. The X-ray equipment (new or used) is properly labelled and bears electrical safety certification marks issued by a recognized testing laboratory. The marks are recognized by the BC Safety Authority.
- 27. New X-ray equipment components are recognized by Health Canada for human medical diagnosis use under the Medical Devices Active License Listing (MDALL).
- 28. New X-ray equipment is sold either by a manufacturer or supplier holding a current Health Canada Medical Device Establishment License (MDEL).