

# COVID-19 ADVISORY

Radiation Protection Element  
Issued April 21, 2020



New Jersey  
Department of  
Environmental  
Protection

## **DEP issues guidance for X-Ray Machine Source Operators, Radiologic Technology Licensees and Educational Programs for compliance concerns due to the COVID-19 Pandemic**

### **Who is affected by this advisory?**

This advisory affects all entities that possess x-ray producing machines, individuals that hold radiologic technology licenses and educational programs that teach radiologic (x-ray) technology and radiation therapy.

### **Why is DEP addressing these issues?**

As part of the state's coordinated response to address the novel coronavirus (COVID-19) outbreak, Governor Phil Murphy has declared a State of Emergency and a Public Health Emergency under Executive Orders 103, 104, 107, 108, and 109. The New Jersey Department of Environmental Protection (NJDEP) understands that the unprecedented circumstances of the COVID-19 outbreak, including the need to restrict unnecessary travel and adopt social distancing practices as described in the Executive Orders, has created limitations for many regulated entities, including registered operators of x-ray machine sources, licensed radiologic technologists, and educational programs. Limitations may be due to workforce reductions, limited access to regulated facilities and potential interruption in testing services and educational programs. As a result of the limitations stemming from the outbreak, and in accordance with the Executive Orders, the Department is responding to the immediate needs of the affected facilities and individuals, to allow them to focus their attention on the highest priorities, while continuing to meet the necessary requirements that help ensure public health and safety.

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## What is DEP doing?

The NJDEP's Bureau of X-ray Compliance (Bureau) is collaborating with various federal partners, the Conference of Radiation Control Program Director's and professional medical organizations to provide recommendations on how to continue to ensure public health and safety despite the logistical concerns and challenges anticipated as a result of the measures undertaken in accordance with the Executive Orders.

The Bureau recognizes that during the current COVID-19 public health emergency the regulated community may experience challenges in meeting certain regulatory requirements. For example, the New Jersey regulations for X-ray machines requires various surveys and testing to be conducted in order to maintain compliance. The Bureau is aware that some regulated facilities have limited personnel access to medical equipment because of COVID-19. Registered users of x-ray machine sources that anticipate that they will be unable to comply with any regulatory requirement should contact the Bureau as soon as a potential issue is identified. The Bureau will evaluate the self-identified issues and any specific requests for relief on a case-by-case basis.

## What should I do?

For now, the Bureau is issuing the following guidance for registered x-ray machine source operators to ensure the continuity of radiation safety during COVID-19 related restrictions. This is a rapidly evolving situation and subject to change.

### Quality Control Testing

All quality control testing that is routinely performed by the facility personnel should continue to be performed.

### Medical Physicist Surveys:

1. Any surveys that are missed due to COVID 19 related issues shall be documented and reported to the Bureau as soon as the potential issue is identified. Documentation should be made available at the next inspection and enforcement discretion will be considered.
2. Surveys required following major repairs to or new installations of equipment should be completed as required by the regulation. If the survey cannot be performed within the regulatory timeframe, it shall be documented and reported to the Bureau as soon as the potential issue is identified. Documentation should be made available at the next inspection and enforcement discretion will be considered.
3. For any other surveys that do not meet the required regulatory timeline, the facility shall document the reason for the delay and include any specific site information.

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Documentation should be made available at the next inspection and enforcement discretion will be considered.

4. Facilities needing other relief from regulatory compliance arising from COVID 19 related restrictions are directed to contact the Bureau for further guidance.

## **Medical Physicist X-Ray Therapy Equipment Calibration/Surveys**

X-ray Therapy Facilities with compliance questions should contact the Bureau for further guidance. The Bureau will evaluate these requests on a case-by-case basis.

## **Compliance with the following requirements is required at all times:**

1. Notification of exceeding annual dose limits
2. Notification of medical events as described in current state regulations

## **In addition to these efforts:**

1. An advisory Notice was issued by the NJDEP that allows hospitals and other health care facilities in New Jersey to employ radiologic technologists, who are not New Jersey licensed, but hold a current active national certification issued by the American Registry of Radiologic Technologists (ARRT) until June 30, 2020.
2. The Bureau, with discussions with the Radiologic Technology Board of Examiners' Program Evaluation Committee, issued recommendations to educational programs for on-line didactic instruction and examination proctoring and for the relaxation of certain clinical competency requirements that exceed national requirements. Thus, ensuring that New Jersey graduates will have met minimum national standards for competency.
3. The Bureau will consider proposed changes to imaging protocols (outside the accepted standard practices) that will reduce potential for exposure of facility staff to COVID 19 patients and contamination of equipment. Any facility seeking to deviate from the normal scope of practice should seek approval by the Bureau prior to implementation.

## **Who should I contact with questions?**

If you have questions concerning the status of your radiologic technology license, or questions regarding your facilities compliance with regulations, or to notify the Bureau of a potential compliance issue, please contact Arthur Robinson, Chief, Bureau of X-ray Compliance at (609) 984-5634 or via email at [arthur.robinson@dep.nj.gov](mailto:arthur.robinson@dep.nj.gov).

Please note this advisory is intended to be a summary explanation. If you have specific questions related to compliance, please contact the number listed above.