



INFORMATION NOTICE 2018-PP1

MAY 2018

THE ROLE OF THE INDIVIDUALS AUTHORIZED TO OPERATE RADIATION MACHINES AND AUXILIARY PERSONNEL IN RADIOGRAPHY AND FLUOROSCOPY PROCEDURES

The Iowa Department of Public Health (IDPH) is issuing this information notice to clarify the role of the radiologic technologist and others authorized to operate radiation machines and auxiliary personnel when performing radiography and fluoroscopy in Iowa. It is expected that recipients will review the information for applicability to their individual situations and consider actions as appropriate. No written response to this notice is required.

DEFINITIONS AND APPLICABLE RULES:

Iowa Administrative Code 641-42.2(136C) Definitions.

Permit means the document issued to an individual by the department when the individual has met the requirements of this chapter. This document authorizes the individual to perform the duties allowed for the classification of permit issued.

Radiography means a technique for generating and recording an X-ray pattern for the purpose of providing the user with an image(s) during or after termination of the exposure.

Radiologic technologist means an individual, excluding X-ray equipment operators, who performs radiography of the human body as ordered by an individual authorized by Iowa law to order radiography.

Iowa Administrative Code 641-42.3(1) the following are exempt from obtaining a permit as required by this chapter:

- a. A licensed physician
- b. A licensed physician's assistant
- c. A licensed chiropractor
- d. A licensed dentist
- e. A licensed dental hygienist
- f. A licensed podiatrist
- g. An individual certified by the dental board in dental radiography
- h. A student as a part of the student's formal education

DISCUSSION:

This information notice addresses the use of auxiliary personnel to assist with diagnostic or fluoroscopy radiographic imaging, specifically adjusting the exposure settings or initiating the x-ray tube exposure by activating the exposure switch on the radiation machine. Only permit holders or those exempt according to IAC 641 42.3(1) are authorized to perform all aspects of the radiographic procedure, however it is recognized that there are certain scenarios where the use of an auxiliary individual is necessary to complete the imaging study. This guidance clarifies when and how the use of these individuals is acceptable.

Appropriate use of auxiliary personnel

Auxiliary personnel are prohibited from adjusting exposure settings or initiating x-ray tube exposures for any purpose unless they are specifically directed to do so under explicit and direct verbal instruction of the radiologic technologist or other authorized radiation machine operator who is performing the radiography procedure.

Explicit and direct verbal instruction scenario examples:

Allowed - The physician asks an attending nurse to change a dial on the control panel from 70kVp to 80 kVp.

Not Allowed - The physician asks an attending nurse to "darken the image"; this is not acceptable because it requires a determination on the part of the attending nurse that the nurse has not been trained to make.

Fluoroscopy in the OR:

During fluoroscopy procedures, the individual authorized to operate the radiation machine may need to request for auxiliary personnel to adjust the c-arm, equipment controls, or initiate exposures when the authorized individual is unable to directly operate the radiation machine. As long as the directions from the authorized individual are very specific and the auxiliary personnel make no independent decisions (as if the auxiliary person was an extension of the physician's arms), this is acceptable. The auxiliary personnel may not independently initiate any exposures.

Limited Radiography Scope:

Limited radiologic technologists who are asked to assist with examinations outside their limited scope of practice are considered as auxiliary personnel in these cases. The individual authorized to operate the radiation machine must be performing all aspects of the exam, be present in the room, provide direct instruction, and use the limited radiologic technologist as an extension of their own arms. The limited radiologic technologist should make no independent decisions involving the use of the x-ray equipment during these examinations that outside of their scope of practice, and should not be requested to independently perform radiography for which the limited radiologic technologist is not specifically trained and permitted to perform.

Students:

The student exemption allows a student to operate a radiation machine only in the context of their formal education program under supervision of their clinical instructors as defined in IAC 641 42.30 - 42.33. Students should not engage in the use of auxiliary personnel to assist with an imaging study and should rely on assistance from an individual authorized to operate a radiation machine as associated with their formal education program.

Failure to follow the rules outlined in Iowa Administrative Code 641 Chapter 42, both the individual(s) performing the actions and the facility could be found to be in noncompliance and can be fined up to \$1000 per day per violation. Other enforcement actions may include but are not limited to; IDPH revoking the individual's permit to practice, the nursing board taking action on a nursing license, and in certain cases CMS funding may be jeopardized.

If you have any questions regarding the above, please contact Angela Leek (515) 281-3478.

Please read this information notice carefully and consult the IDPH website for rules cited in this notice.

FAILURE TO ADHERE TO THE APPLICABLE RULES MAY RESULT IN ENFORCEMENT ACTION



Angela Leek, Chief