

IOWA DEPARTMENT OF PUBLIC HEALTH  
Bureau of Radiological Health (BRH)  
Lucas State Office Building, 5<sup>th</sup> Floor  
321 East 12<sup>th</sup> Street, Des Moines, IA 50319  
February, 2014

IDPH INFORMATION NOTICE: 2014 X-1:                   Badging requirements during fluoroscopy for all students training in Iowa medical facilities

ADDRESSEES:   Iowa healthcare training schools and all facilities where fluoroscopic procedures are performed

PURPOSE

This IDPH Information Notice is to inform all schools and facilities where students train during fluoroscopic procedures of the requirements for badging. **Students in these training programs are considered occupational workers during the clinical component of their training when they must remain in the room/operator during fluoroscopy procedures.** Please read this information notice carefully and consult the IDPH website for rules cited in this notice.

REFERENCES

Excerpts from the Iowa Radiation Machines and Radioactive Materials Rules:

641-40.15(136C) Occupational dose limits for adults.

40.15(1) **The licensee or registrant shall control the occupational dose to individual adults,...**

641-40.37(136C) Conditions requiring individual monitoring of external and internal occupational dose.

**Each licensee or registrant shall monitor exposures** from sources of radiation at levels sufficient to demonstrate compliance with the occupational dose limits of this chapter. As a minimum:

40.37(1) Each licensee or registrant shall monitor occupational exposure to radiation and shall supply and require the use of individual monitoring devices by:

d.       **Individuals working with medical fluoroscopic equipment;**

641-41.1(3) Administrative Controls.

a. Registrant. **The registrant shall be responsible for maintaining and directing the operation of the x-ray system(s) under the registrant's administrative control, for ensuring that the requirements of these rules are met in the operation of the x-ray system(s),...**

DISCUSSION

Based on the above references and the fact that these students are considered occupational workers, the registrant (facility with radiation machines registered with the Bureau of Radiological Health) is responsible to ensure that the requirements for occupational workers are met. Registrants (facilities) serving as clinical sites for students may work with the educational institutions to coordinate the

monitoring for students, however, the responsibility to comply with the above requirements remains with the registrant (facility).

#### CONCLUSION

1. If students will be present during fluoroscopic procedures, they must be monitored for radiation exposure by wearing individual monitoring devices (film badges).
2. If badges are not provided by the school for the students, the registrant (facility) is responsible to provide the film badges.
3. The registrant (facility) is responsible for monitoring students to ensure that the film badges are worn during fluoroscopic procedures where the student is present.

If you have any questions regarding this Notice, please contact Charlene Craig at 515-281-0415 or email [charlene.craig@idph.iowa.gov](mailto:charlene.craig@idph.iowa.gov).

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Angela Leek, Chief, Bureau of Radiological Health

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Date