**Radiation (X-ray) Machine & Radioactive Material License Compliance and COVID-19**

The Louisiana Department of Environmental Quality, Radiation Section registers facilities possessing radiation sources such as X-ray machines, licenses facilities that utilize Radioactive Material, and is responsible for notifying the regulated community of radiation control changes.

The Louisiana Radiation Regulations on radioactive material (RAM) and X-ray machines (LAC 33:XV) include various testing and notifications to be conducted to maintain compliance. The Radiation Section is aware that some facilities are limiting access to vendors due to restrictions they have implemented because of COVID-19. Those prohibitions include restricting or barring access to licensed medical physicists and contractors who conduct required surveys at authorized radioactive material licensees, which will result in a delay in conducting required physics surveys and calibrations. The inability to complete performance testing may lead to a backlog of equipment to be tested.

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 fluid situation and subject to change.

For additional information, contact the Radiation Section at (225)219-3041.

**X-RAY EQUIPMENT SURVEY GUIDANCE.  The following guidance is provided for the next 90 days, effective April 3, 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 Karen Burgard, 225-219-3670. The FDA MQSA contact is Ashley Menard, 337-262-1235.

**Annual Medical Physicist CT and Fluoroscopy Equipment Surveys:**

May be extended to a 16-month window 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 shall be maintained for inspection.

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

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

**Annual Medical Physicist Mammography Equipment Surveys:**

The FDA intends to grant a 2-month extension of the annual Medical Physicist survey requirement for facilities that have Medical Physicist surveys due anytime between January 2020 and June 2020. This 2-month extension is granted from the date the facility would have met their 14-month Medical Physicist survey requirement.

**Annual 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.

**RADIOACTIVE MATERIAL LICENSEE GUIDANCE.  The following guidance is provided for the next 90 days, effective April 3, 2020.**

**RAM licensees:**

* If the licensee *is not prohibited* by facility, local, state, or national governmental guidance or orders related to COVID-19 at the time a regulated task is required, then the licensee shall assume it must perform the task(s) in compliance with all Louisiana regulations.
* If the radiation safety officer or other person responsible for completing a required regulated task is unable to perform his or her duties due to employer or government restrictions related to COVID-19, a licensee must make reasonable efforts to find another qualified individual who can timely perform the regulated task (for example, the therapy physicist may be able to perform routine nuclear medicine tests if the diagnostic physicist is unable to enter the facility).
* All licensees must document any mitigating regulatory factors due to COVID-19 encountered during this time and make the documentation available at inspection. LDEQ will consider documented extenuating circumstances when making final decisions regarding compliance actions.
* If a licensee has documented it is unable to maintain compliance with Louisiana regulations related to RAM due to compliance with local, state, or national government guidance or orders related to the COVID-19 pandemic, this extenuating circumstance will be considered during the next inspection.

**Industrial Radiography Certification:**

* All Louisiana Industrial Radiography Certifications that expire in March, April, and May will be given a 90 day extension. Please register for exams as soon as possible to ensure you will not expire after the 90 days.

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

* **Reports of lost, stolen or missing radioactive sources**
* **Notification of incidents involving radioactive material**
* **Notification of exceeding annual dose limits**
* **Notification of medical events as described in current Louisiana regulations**

**Direct your questions to:**

* RAM Inspection & Rule Compliance: Karen.burgard@la.gov
* Incident or Medical Event reporting:
	+ Initial reports: james.pateIII@la.gov
	+ Follow-Up reporting: james.pateIII@la.gov
* RAM Licensing/SS&D/Industrial Radiography issues: Karen.burgard@la.gov
* Industrial Radiography Certification: Melanie.bauder@la.gov
* X-Ray Inspection and Rule Compliance: Jennifer.Elee@la.gov
* Mammography (MQSA): Ashley.Menard@la.gov
* X-Ray Registration issues: macy.blanchard@la.gov

**Please check back regularly for updates.**