Policy Concern: This policy clarifies the responsibilities of supervisors in ensuring selected classifications of radiation workers obtain initial training and attend retraining as required by regulation and/or license condition. This policy clarifies the fundamental procedures used by the Radiation Safety Office (RSOf) for scheduling training courses for radiation workers and notifying authorized users and/or supervisors of a radiation worker needing to attend retraining. This specific policy applies to Health Care Radiation Workers.

Policy Implementation: The Radiation Safety Officer (RSO) is directed to implement this policy upon approval by the Radiation Safety Committee (RSC) and to use this policy as guidance when implementing training requirements listed in the Radiation Control and Safety Program (RCSP).

Discussion: Health Care Radiation Workers are individuals who may provide physical care to a patient undergoing radiation therapy and the patient is required by regulations to be housed under radiation controls. Under the RCSP, Health Care Radiation Workers must be certified. Only certified Health Care Radiation Workers may provide care to a patient required by regulations to be housed under radiological controls. Each calendar year Health Care Radiation Workers must be recertified in accordance with RSC Policy Statement 97-2. These training requirements are conditions of the University of Cincinnati medical broad scope license.

At the time the initial policy was reviewed by the RSC, current regulations required initial instruction for all personnel who provide care to a patient housed under radiation controls. It was also noted that though currently there was a license condition requiring calendar year retraining of Health Care Radiation Workers there were draft rules, which by NRC regulations would have to be enacted in the state of Ohio by October 2005 that would require both initial training and annual retraining.

At the time the initial policy was reviewed by the RSC there were ongoing violations of the license condition where care was provided to patients housed under radiation controls and the health care provider was not a certified Health Care Radiation Worker. TUH Nursing indicated, in part, the failure of individuals to obtain and retain certification was due to problems with scheduling the training. Problems cited include, lack of a set Health Care Radiation Worker training schedule and/or the short period of time between when course times are announced and the course is presented. In an attempt to correct these deficiencies, the Radiation Safety Officer (RSO) agreed to develop a Health Care Radiation Worker training schedule at the end of each calendar year for the following calendar year. A training schedule for 2004 was developed, using a course presentation frequency recommended by TUH Nursing. The training schedule was distributed to the CPs listed for each CP/dosimetry series group of Health Care Radiation Workers in mid-December 2003 and posted on the RSOf website. However, misunderstandings and miscommunication about responsibilities and procedures continued.

A second attempt to correct the deficiencies occurred in 2004 when the RSC approved RSC Policy 04-1. The initial policy covered initial and retraining requirements for RAM Radiation Worker and Health Care Radiation Workers. The RSC approved the policy May 19,
2004 and by the end of 2004 there was a significant improvement in compliance to retraining requirements.

In August 2005, the Ohio Department of Health enacted revised regulations. The revised regulations included new training requirements for Health Care Radiation Workers and a subgroup of RAM Radiation Workers, HDR Users. Therefore, the initial policy was split into three policies RSC Policy 04-1A, RSC Policy 04-1B and RSC Policy 04-1C. RSC Policy 04-1A applies to RAM Radiation Workers. RSC Policy 04-1B applies to Health Care Radiation Workers. RSC Policy 04-1C applies to HDR users.

In April 2008, Children’s Hospital, the only hospital with health care personnel under the Radiation Control and Safety Program submitted a request to have the cancellation time for scheduled courses extended from 24 hours to 72 hours. The request was initiated because of problems with training room scheduling and availability.

In early February 2009, the Radiation Safety Officer noted a significant number of Health Care Radiation Workers were routinely and/or repeatedly completing their training late during the 13th month (the plus one month allowed by the policy at the time) or after they were suspended from providing care to patients undergoing radiation therapy. The result of the delay in completing the training was an ongoing significant change in due date and individuals not meeting the regulatory requirement of “about the same time each year.” The Radiation Safety Officer brought the issue/concern to the attention of the Radiation Safety Committee during the Committee’s regular meeting on February 18, 2009. The Radiation Safety Committee approved two changes to the policy. One change is the definition of annual would change from “once per year, at about the same time, plus or minus one month” to “interval not to exceed one year.” The second change is to paragraph (2)(a) to require retraining to be performed no more than one year after the prior training/retraining was complete and the next day suspension would become effective. The Radiation Safety Committee determined the effective date of the change would be March 1, 2009 with a “transition” period allowed until May 1, 2009. During the “transition” period suspended individuals may provide care to radiation therapy patients if the individual would not have been suspended under the prior rule.

Policy Definitions

**Annual:** An interval not to exceed one year.

**Calendar year:** January 1 through December 31.

**Health Care Radiation Worker:** An individual who provides physical care to a patient under radiation precautions.

**HDR User:** A RAM Radiation Worker who has obtained the permission and additional training to operate a high dose rate remote afterloader (HDR).

**RAM Radiation Worker:** An individual who handles radioactive material or radioactive waste, or performs surveys to detect radioactive contamination under the University of Cincinnati RCSP.

**Supervisor:** For Health Care radiation workers the supervisor is the contact person listed in the RSOf database for the CP/dosimetry series the Health Care Radiation Worker is listed under.

**Initial training:** For Health Care Radiation Workers this is the Initial Certification course.
Retraining: For Health Care Radiation Workers this is either the Radiation Safety-Learning Package and associated recertification examination, or the Recertification Course.

Policy Statement – Health Care Radiation Workers
(1) All potential Health Care Radiation Workers shall attend initial training (i.e., Initial Certification course) prior to performing any duties of a Health Care Radiation Worker.
(2) To maintain Health Care Radiation Worker status an individual shall attend an initial training or an appropriate retraining course annually.
   a. The Health Care Radiation Worker status of individuals who have not met their annual retraining within one year of their previous initial/retraining course shall have their Health Care Radiation Worker status suspended effective on the following day. (e.g., individual whose last applicable training course occurred on April 1, 2004 did not attend an initial training or a retraining course by April 1, 2005 suspension will be effective April 2, 2005)
      i. The RSO shall notify individuals of their suspended Health Care Radiation Worker status. Notification shall be by memorandum sent via campus mail no later than the first week of the month following the date of suspension.
      ii. The RSO shall notify Supervisors of an individual’s suspended Health Care Radiation Worker status. Notification shall be by copy of the memorandum to the Health Care Radiation Worker.
   b. Individuals who have not met their retraining obligation by the first RSC meeting following suspension of the individual’s Health Care Radiation Worker status shall have their Health Care Radiation Worker status deactivated.
      i. The RSC Chair shall notify individuals of their deactivated Health Care Radiation Worker status. Notification shall be by memorandum sent via campus mail within one week of the RSC meeting.
      ii. The RSC Chair shall notify Supervisors of an individual’s deactivated Health Care Radiation Worker status. Notification shall be by copy of the memorandum to the Health Care Radiation Worker and sent via campus mail within one week of the RSC meeting.
      iii. The RSC shall instruct the RSO to cancel the Health Care Radiation Worker status and any dosimeters for individuals who had their Health Care Radiation Worker status deactivated by the RSC. Cancellation shall be processed by the RSO of within one week of the RSC meeting. Dosimeter cancellations shall be effective as soon as possible according to the dosimeter vendor’s deletion practices.
(3) Prior to reinstatement of Health Care Radiation Worker status an individual must bring their training status up-to-date.
   a. Individuals who last attended an appropriate initial training or retraining course three years ago or less may bring their training status up-to-date by attending an initial training (i.e., Initial Certification course) or an appropriate retraining course. (Three years or less is based on exact calendar date of last course taken and date of reinstatement course to be attended.)
   b. Individuals who last attended an appropriate initial training or retraining course over three years ago must bring their training status up-to-date by attending an appropriate initial training course (i.e., Initial Certification course).
c. Individuals who had their Health Care Radiation Worker status deactivated by the RSC must bring their training status up-to-date by attending an appropriate initial training course (i.e., Initial Certification course).

(4) Scheduling of radiation safety training courses:

a. No later than December 15 of each year the RSOf shall publish a course schedule for the next calendar year.
   i. A copy of the published course schedule shall be sent via campus mail to all applicable Supervisors by December 15.
   ii. The course schedule shall be posted on the RSOF website by December 31.
   iii. The course schedule shall include the following:
      1. Schedule for Health Care radiation workers
         a. Initial Health Care Worker Certification course (an initial training course)
         b. Recertification Exam sessions (part of a retraining option; see RSC policy 97-2)
         c. Recertification Course (a retraining option)
   iv. The schedule shall be based on past years’ experience of attendance and shall ensure:
      1. The initial training course for Health Care Radiation Workers is presented at least quarterly.
      2. The retraining Recertification Course session is presented at least quarterly.
      3. The recertification self-learning exam will either be presented at least quarterly or will be provided using on-line option.
   v. The RSOF is not obligated to present any training course listed in the published schedule for which there are no attendees scheduled 72 hours before the start time of the course or no attendees have arrived within 10 minutes after the start time of the course.

b. Upon approval of the RSO, the RSOF may provide special presentations of established courses (i.e., initial training and retraining courses listed on the published course schedule). Except for the following, it is the RSO’s discretion whether a requested special presentation will be accepted.
   i. The RSO shall grant approval to special presentation requests for established courses (i.e., courses that are included in the published course schedule) if:
      1. Made at least two weeks in advance of desired presentation date and time.
      2. The desired presentation date and time fits within the work schedule and is during the normal work hours of the individual who, based on the current RSOF work assignments, would perform the presentation. (and)
      3. The number of attendees is confirmed by the requesting Supervisor to be 6 or more.
   ii. The RSO shall grant approval to special presentation requests for non-routine retraining courses (i.e., courses that are not included in the published course schedule and/or require syllabus development) if:
      1. Made at least six weeks in advance of desired presentation date and time.
      2. The course subject is within the scope of the license requirements for retraining.
      3. The course presentation is approximately one hour.
      4. The desired presentation date and time fits within the work schedule and is during the normal work hours of the individual who, based on the current RSOF work assignments, would perform the presentation. (and)
5. The number of attendees is confirmed by the requesting Supervisor to be 6 or more.

iii. The RSO shall disapprove any requests where:
1. Past experience of the RSO indicates the Supervisor has multiple times not met past special presentation commitments (e.g., the Supervisor has scheduled course for 6 attendees and only 5 or less attended).
2. The Supervisor request does not meet the standard special presentation requirements.
3. The Supervisor does not provide adequate justification, in the opinion of the RSO, that a special presentation is warranted.

c. As directed by the RSC as part of disciplinary action, the RSO shall present special training courses. For RSC directed courses the RSC shall ensure the special course presentation request meets the standard special presentation guidelines noted above or ensures, as determined by the RSO, the presentation does not interfere with the RSO carrying out their normal duties.

(5) Retraining reminders
a. Each July the RSO shall provide Supervisors with a report listing all individuals currently under their supervision and any radiation safety courses the individuals have attended.

b. Monthly the RSO shall by the end of each month send via campus mail to each applicable Supervisor a list of individuals under their supervision who need to complete their retraining during the following calendar month.

(6) Supervisor responsibilities include, but are not limited to:

a. Ensuring each potential Health Care Radiation Worker obtains required initial training prior to performing any activity requiring the training.

b. Ensuring the Health Care Radiation Worker properly completes and submits a current Radiation Worker/Dosimetry Application form (RS Form 2.0) to the RSO. The RS Form 2.0 submitted must include the Supervisor’s signature.

c. Ensuring the Health Care Radiation Worker attends appropriate retraining courses, as needed.

d. Ensuring Health Care Radiation Workers schedule attendance at an initial training or retraining course at least 72 hours prior to the scheduled course time.

e. Notifying the RSO when an individual should no longer be considered a Health Care Radiation Worker under the Supervisor. (This notification may be via email to the RSO or submission of RS Form 2.0)

(7) Special requirements:

a. Individuals must not be late for courses. Individuals who arrive more than 10 minutes after a course’s start time will not be considered as attending the course.

b. Initial Training Courses

i. The passing score for exams given during initial training (i.e., Initial Certification) courses is 70%.

ii. Individuals who fail an exam given during an initial training course shall be required to either:

1. Retake the initial training course or

2. Schedule a meeting with the trainer or an RSO staff member approved by the RSO for one-on-one remediation.

RSC Policy 04-1 (revision 3)
Page 5 of 6
a. Individuals who complete one-on-one remediation shall be assigned the minimum passing score of 70%.

c. *Health Care Radiation Worker* recertification examination process
   i. The recertification process must also meet the requirements of RSC policy 97-2.
   ii. The *Supervisor* is responsible for ensuring each individual is provided a copy of the Radiation Safety Self-Learning Package and completes the Radiation Safety Self-Learning Package prior to scheduling and/or taking the recertification examination.
   iii. *Health Care Radiation Workers* may take the Recertification Exam on a walk-in basis at the RSOf between 8:00 AM and 4:00 PM, standard RSOf business days.
      1. Questions may be answered for walk-ins, if an RSOf technical staff member who can answer the questions is available.
      2. *Health Care Radiation Workers* must provide documentation they have completed the Radiation Safety Self-Learning Package prior to being provided a recertification exam. (A form that may be used to provide the documentation is included with each Radiation Safety Self-Learning Package and is available from the RSOf.)
   3. Individuals who fail the exam are expected to review the Self-Learning Package prior to retaking the exam.
   iv. *Health Care Radiation Workers* may take the Recertification Exam on line through the University of Cincinnati Continuous Professional Development website (cpd.uc.edu)
      1. Prior to initiating the exam the *Health Care Radiation Worker* will be required to verify they have completed the Radiation Safety Self-Learning Package.
      2. Individuals who pass the exam shall be provided answers to questions missed, along with the location within the Radiation Safety Self-Learning Package where the information was presented.
   v. *Health Care Radiation Workers* who fail a recertification exam after the first attempt at taking the Recertification Exam may retake the Recertification Exam after 48 hours and a second completion of the Radiation Safety Self-Learning Package, with appropriate documentation submitted. *Health Care Radiation Workers* who fail the Recertification Exam twice must recertify by attending an Initial Certification course or a Recertification Course.

d. *Health Care Radiation Workers* may contact the RSOf (558-4110) and arrange a meeting with the Radiation Safety Specialist Overseeing Health Care Radiation Worker Training to discuss questions, misunderstandings and/or obtain tutoring.

Approval
Initial policy 04-1 approved by Radiation Safety Committee May 19, 2004
Revision 1 approved May 17, 2006
Revision 2 approved May 14, 2008
Revision 3 approved February 18, 2009, effective date March 1, 2009

Signature of RSC Administrative Representative ____________________________ on file ____________________________