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GAVIN NEWSOM  
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## Preparing for Dental Inspection

Radiologic Health Branch (RHB) inspectors will review your program for safety and compliance with Title 17, the California Code of Regulations (Title 17); Title 10, Code of Federal Regulations, Part 20. Links to the mentioned laws and regulations are available through the [Laws & Regulations](#) page of the [Radiologic Health Branch](#) website.

- RHB inspectors are Health Insurance Portability and Accountability Act (HIPAA) exempt, although any documents requested to be photocopied may be redacted to exclude confidential patient information. Any photos we request to take will not include facility personnel without express permission.

### Documentation for Review

Provide the following documentation for review at the start of the first day of inspection. If documents are available electronically, please provide a laptop or other computer access for the inspector's use of document review. If all documentation is only available electronically, more than one computer will be necessary.

- The facility X-ray machine inventory, showing manufacturer, model, serial number, I.D. or control/asset number, and department and room location.
- Lists of dentist(s) and operator(s) and copies of radiations safety training certificates for unregistered dental hygienists and dental assistants.
- Title 17, California Code of Regulations; Title 10, Part 20, Code of Federal Regulations and the California Health and Safety Code.
- The Radiation Safety & Protection Program written policies and procedures. Policies and procedures related to radiation safety and the use of diagnostic imaging units should include, but may not be limited to, the following (Title 10, Code of Federal Regulations, Part 20 Section 1101):
  - Staff competency and training
  - Radiation safety training for occupational and non-occupational workers
  - As low as Reasonably Achievable principles (ALARA)
  - Patient identification
  - Operator pregnancy policy Radiological emergencies / instrumentation and calibration
  - Annual radiation safety program audits

- Dosimetry Program records for the past three years; each report should be reviewed, initialed and dated by the registrant designee. (Title 10, Code of Federal Regulations, Part 20 Section 1502)
- Preventative maintenance (PM) and service records for X-ray machines for the last year, or the last records if greater than one year since service.
- Quality Assurance/Quality Control Test records for the past three years.
- Method(s) used to ensure only qualified staff operate X-ray equipment.

The documents requested above only need to pertain to your facility, but if policies and procedures apply organization-wide or cross-campus, include them.

#### Overview of on-site agenda:

- Entrance meeting. Present inspection agenda and answer questions.
- Document review (of above requested documents).
- Physical review or walk-through to observe staff in the actual performance of their radiologic technology duties, and the rooms and locations where radiological activities occur:
  - Conduct staff interviews (in-scope certification, knowledge of location of regulations and dosimetry records, etc.).
  - Observe ALARA procedures (dosimeter badge and protective lead use, use of room shielding, dead-man switches in shielded locations in rooms, controls against unauthorized use of portable units, etc.).
  - Observe recent radiographic images taken for diagnostic quality and collimation to area of clinical interest only.
  - Check for required postings ([Notice to Employees](#)), Safety Instructions, Title 17 or instructions to access it, signage (Caution X-ray), and technique charts specific to each radiographic unit. (California Code of Regulations, Title 17 Section 30255)
- Physical testing of each machine will be performed.
- Exit meeting. Present findings: violations and items of concern. Violations corrected prior to the exit meeting will be noted as such with no further action required.

#### Personnel requested:

- Attendance by appropriate staff at the entrance and exit meetings. Minimally, staff in attendance should be the supervising dentist.

- Assistance by at least one staff member during or after the document review to answer questions and provide clarifications and additional documents.
- Accompaniment by at least one staff member during the physical review for assistance and direction.
- Assistance by the dentist or other qualified operator during the physical testing to operate units.

### **Dental Post-Inspection Process**

You will be provided a copy of the inspection findings within 2 weeks of your inspection. If you do not receive the findings, please contact the inspector directly. You will be allowed 30 days to provide adequate response to the findings. The response must be in writing, and you may need to include supporting documentation such as purchase orders, service reports, or policies or procedures that outline the provider's attempt to prevent a repeat occurrence of a violation identified. A response via email is preferred.