



Dental X-ray Inspection Process Q&A

Question: Where is the certificate of registration supposed to be located?

Answer: The most up-to-date notice to employees' sign on the radiation control program's website should be posted in a visible location. It includes a fill-in-the-blank section where specific documents such as notice of violation and certificate of registration can be posted by reference.

Question: Do we still need to physically have the registration posted?

Answer: While it is a requirement for the registration to be physically posted, it can also be posted by reference. If the registration is not physically posted, ensure it is referenced in the most up-to-date notice to employees.

Question: I used to work as an associate dentist for the company where they had an X-ray registration under my name. I left the office, but they did not change it. I informed management to change it, but they responded they would do it when it expired. Am I liable for any penalties for any violations?

Answer: Yes, the certificate of registration in your name would need to be terminated if you were no longer associated with that entity. They are required to apply and obtain their certificate of registration within 30 days of first equipment use.

Question: Where can we buy the three-density testing object for QAQC testing?

Answer: Those can be found online. Many entities Google them due to their affordability. An online search for "dental step wedge" should yield several options for purchase. However, it's also possible to use any old electronics with 3 varying densities or thicknesses.

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Question: How do you remove a nomad from use and how do you dispose of it so you can take it out of service?

Answer: We do not regulate the disposal of x-ray equipment. Please look at the TCEQ website for more information regarding disposal. You must maintain documentation that the device was transferred or disposed of, and you can create that document yourself.

Question: How do you dispose of digital sensors that are no longer working? Do we need to document that the sensors are no longer in use?

Answer: No you do not need to document that the sensors are no longer in use. The Texas Department of State Health Services does not have any requirements for sensor disposal. You may check with the TCEQ for guidance on disposal.

Question: Do patients need to continue wearing the protection bib for a panoramic/CBCT scan?

Answer: There are no specific requirements for lead aprons in our rules. The Dental Board rule governing the use of lead aprons is available on the TDA website on their designated page for the State Board of Dental Examiners.

Question: Does the technique chart need to be posted?

Answer: Yes, the technique chart needs to be posted or in a format as mentioned in the slides, where it can be digitally built into the equipment. If not, it can be printed and posted near the unit.

Question: What information is required for the transfer record?

Answer: The transfer record should include the date of the transfer, equipment details such as make, model, and serial number, and transfer details indicating where the equipment is being transferred from and where it is going.

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Question: What forms are required if an X-ray unit is moved from one site and stored at another?

Answer: A record of the transfer is required. The registrant may create their own memorandum on facility letterhead. Include when the device was moved, the make, model, and serial number of the machine, and have whoever filled out the form sign and date.

Question: Is a separate form required for equipment disposal?

Answer: Yes, if equipment is being disposed of rather than transferred, a separate disposal form should be created.

Question: Where can we buy the three-density sensor for QAQC testing?

Answer: The sensors can be found online and are relatively inexpensive. Consider searching for "dental step wedge" or "three-density sensor" to find several options for purchase. Additionally, any old electronics can also work effectively for these purposes, so you may not necessarily need to purchase a third-party tool. Anything that'll have 3 varying densities or thicknesses would be what we're looking for.

Question: Please explain how to take a test with the step wedge.

Answer: The first step is to capture a baseline image using the aluminum step wedge. You will need to adjust the settings to achieve the best image quality for the baseline and note down the technique settings used. Noting the technique settings used will allow you to replicate the same testing again with the same sensor. Review future images to determine if there is a deterioration in image quality, indicating that the sensor needs to be inspected and repaired. As per the presentation, initiation of repair should occur within 30 days, and the repair should be completed within 90 days.

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Question: How do we test digital panoramic machines with a step wedge?

Answer: Digital panoramic machines are held to the same quality assurance/quality control requirement. There are larger aluminum step wedges available that may need to be fixed within the unit. For example, for CBCTS, a dedicated phantom may need to be placed in the unit when performing QA QC tests. If there is a manufacturer protocol available, it should be followed first. If there is no manufacturer protocol, the facility would be required to create its own. You can reach out to your service company for guidance.

Question: For a Pan/Ceph machine, can a staple remover be used for QA/QC?

Answer: Yes, a staple remover can be used for the Pan/Ceph machine. It has plastic and two types of metals.

Question: How do we terminate the previous safety officer and register a new safety officer for an office?

Answer: The forms can be located on our website. There is an RSO form and an application form to update the certificate of registration. You can also reach out to our Registration Program at Xrayregistration@dshs.texas.gov.

Question: How long do we need to keep records on a machine we no longer have?

Answer: You can navigate to our rules §289.232(k)(2)(A) for the entire record retention list.

Question: Do we need to be wearing and documenting monitoring badges?

Answer: No, you do not need to wear and document badges for all dental modalities. According to our rules, anyone unlikely to receive more than 10% of the annual dose limit is not required to wear a badge.

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Question: What happens if violations are found during inspection?

Answer: You are always given 30 days to respond. If the violations are severe, you may face monetary penalties.

Question: Which violations have monetary penalties associated with them?

Answer: Violations with severity level one or severity level two may have monetary penalties associated with them.

Question: Do CBCT Pano combo units use the same sensor, and do they need to be tested quarterly?

Answer: Yes, CBCT Pano combo units use the same sensor. These units need to be tested either at the manufacturer's specifications or, if facility-established, at least quarterly.

Question: What about combo units that are Pano and cephalometric instead of the CBCT aspect?

Answer: Combo units with Pano and cephalometric capabilities, using two separate heads and two separate sensors, need to be evaluated independently.

Question: Does the RSO have to be someone who is in that location every day?

Answer: That is not a requirement. However, it's important for the RSO to be aware of activities within the practice and ensure that the radiation safety program is being followed.

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Question: Can we go back over the slide of the correct way to push the X-ray button from outside the room?

Answer: The rules state that you must maintain verbal, aural, and visual contact with the patient. It's crucial to not only have the means to see the patient but also to actively watch them when taking the shot.

Question: Are transfers considered transferred to a geographic location or transfer of ownership?

Answer: Transfers could be both. It's important to document any change in ownership by creating a transfer form with details like equipment information, date of acquisition, address, and signatures.

Question: How often should we be making a registration payment?

Answer: The fees are biannual, so registration payments should be made every two years.

Question: What are some examples of severity levels one and two? Is there a chart we can find online for penalty levels?

Answer: Severity levels and their meanings are listed in the rule, and specific violations are detailed in the notice of violation. There may not be a chart available online, but you will find the severity levels listed on the notice of violation. The severity level of violations that repeat from inspection to inspection is elevated. For example, if a violation is normally a severity level three and it is a repeat violation from the previous inspection, then the severity level would elevate to two. Severity level one and two violations will be referred to the Compliance Review Committee for possible monetary penalties.

Question: When we create a transfer form, aside from keeping it for our records, do we need to submit it to DSHS?

Answer: No, you must maintain the transfer form for your records. There is no requirement to submit it to the Agency.

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Question: Can you clarify what exactly needs to be posted on the technical chart?

Answer: The technique chart needs to provide technical factors, anatomical examination, and patient size for the examination being performed needed to make clinical radiographs when the radiation machine is in manual mode. Most modern units have a built-in digital technique chart.

Question: Where can we get the technique chart?

Answer: Please work with your service company to determine what would be an adequate technique for the technique chart.

Question: Do registrations need to be updated every so often?

Answer: For any changes that would make the certificate of registration inaccurate, such as an RSO change, you have 30 days to ensure the certificate is updated. For any other pertinent changes, you may reach out to the Registration group.