

§482.26(b)(3) - Radiation workers must be checked periodically, by the use of exposure meters or badge tests, for amount of radiation exposure.**Interpretive Guidelines §482.26(b)(3)**

This requirement applies to radiologic services personnel, as well as other hospital employees who may be regularly exposed to radiation due to working near radiation sources. This could include certain nursing and maintenance staff. The types or locations of employees who require monitoring for radiation exposure must be identified in the policies and procedures for the radiologic services developed or approved by the radiologist who supervises the services, in conjunction with the appropriately qualified radiation safety personnel. The monitoring of staff exposure must be documented by qualified personnel.

Hospitals are expected to educate staff who are monitored for radiation exposure about the appropriate use of the monitoring meters or badges (or through use of a “personal radiation monitoring device,” which employs modern technology for the same measurement purpose). Hospitals must educate staff on the importance of tracking their radiation exposure over various timeframes, such as the most recent month and year, as well as their cumulative exposure through work. Staff also must be educated about the appropriate storage of the meters and/or badges as well as the procedures to follow if the exposure device exceeds cumulative dosage parameters specified per hospital policy. The hospital is expected to proactively monitor staff cumulative dosage and take appropriate steps if an individual staff member’s cumulative dosage level exceeds parameters specified per hospital policy.

For Information Only – Not Required/Not to be Cited

The Occupational Safety and Health Administration (OSHA) has requirements for protecting hospital staff from radiation exposure, some of which are summarized below:

- “For information about exposure limits see: 29 CFR 1910.1096, Ionizing Radiation Standard. The standard also requires:
 - ...Every employer shall supply appropriate personnel monitoring equipment, such as film badges, pocket chambers, pocket dosimeters, or film rings, and shall require the use of such equipment [29 CFR 1910.1096(d)(2)]

- Employers shall maintain records of the radiation exposure of all employees for whom personnel monitoring is required under paragraph (d) of this section and advise each employee of his individual exposure at least yearly...

See:

<https://www.osha.gov/SLTC/etools/hospital/clinical/radiology/radiology.html#Radiation>

As a reminder, although hospitals are required to comply with applicable OSHA requirements, surveyors conducting surveys on behalf of CMS do not interpret or assess compliance with the requirements of OSHA or other Federal Agencies. Surveyors do assess compliance with Medicare requirements that may overlap or duplicate OSHA requirements.

Survey Procedures §482.26(b)(3)

- Verify that staff being monitored have been trained about the appropriate use and storage of their badges/meters. Are staff knowledgeable about their personal radiation exposure over various timeframes?
- Observe whether staff in categories or locations identified for monitoring have radiation-detecting meters or badges and that they appropriately wear and store them.
- Review records to verify that monitoring of staff exposure is documented.
 - Ask the hospital what steps it takes if staff exposure exceeds parameters established per hospital policy. Can the hospital provide examples, or, if it asserts there have been no cases in the prior 12 – 24 months, do its records support this?