



# CCOA Radiation Registration Agency Manual



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## Glossary

Database	iMIS, Microsoft Excel, CCOA Onsite Server for Data Files
Director	Person appointed as Director under the Occupational Health and Safety (OHS) Act.
Guide	Guide for Alberta's Radiation Protection Program (publication number RAD010), as amended from time to time and published by Alberta Labour and Immigration
Inspection agency	A person designated under Section 58 of the OHS Act as an Authorized Radiation Protection Inspection Agency (ARPIA)
OHS	Occupational health and safety
OHS Act	OHS Act, SA 2020 c0-2.2
Program	Alberta's Radiation Protection Program
Radiation agencies	Inspection agencies and registration agencies
Radiation equipment	Designated radiation equipment as specified in the OHS Code.
Registration agency	An organization designated under Section 58 of the OHS Act as an Authorized Radiation Health Registration Agency
Registration agency manual (manual)	Manual containing information specified in Appendix B of the Guide
Registration certificate	Radiation equipment registration certificate

## Radiation protection program contact

Mark Rice

Director (*OHS Act*)

Alberta Labour and Immigration

Occupational Health and Safety Program Delivery Branch

Government of Alberta

Tel: 780-415-2400

[Mark.Rice@gov.ab.ca](mailto:Mark.Rice@gov.ab.ca)

## Compliance and program reporting

[LBR.RadiationProgram@gov.ab.ca](mailto:LBR.RadiationProgram@gov.ab.ca)

## Applicable legislation and documentation

- [Occupational Health and Safety Act](#)
- [Occupational Health and Safety Code](#)
- [Radiation Program Guide](#)
- [OHS Code Updates](#)
- [Personal Exposure Monitoring for ionizing radiation](#)
- [Radiation Emitting Device Act \(Canada\)](#)



## Scope of CCOA as an Authorized Radiation Health Registration Agency

### General

The College of Chiropractors of Alberta (CCOA) is organized under the *Health Professions Act* to regulate the practice of chiropractic in Alberta and is designated as an **Authorized Radiation Health Registration Agency (ARHRA)**.

As an ARHRA, the CCOA reviews applications from regulated members seeking a registration certificate for radiation equipment in chiropractic facilities. When the requirements of registration are met, including the required compliance report from an Authorized Radiation Protection Inspection Agency (ARPIA) demonstrating compliance, and the diagnostic or therapeutic procedure is adequately considered in the profession's standards, the CCOA as an ARHRA provides a certificate of registration for the equipment in the application.

### Profession specific

To fulfill its regulatory and agency mandates, the CCOA develops Standards of Practice that guide the use of the diagnostic imaging in chiropractic practice with the express intention to ensure chiropractors demonstrate clinical relevance and accountability in the ordering and applying of diagnostic imaging.

As part of fulfilling its duties as an ARHRA and the regulatory body for the practice of chiropractic in Alberta, the CCOA requires all regulated members who own and/or operate X-ray equipment to participate in the Radiation Health and Safety Program, including the X-ray Quality Assurance Program (QAP). The QAP is intended to ensure that regulated members who own or operate X-ray meet the Standards of Practice for diagnostic imaging. See Radiation Health and Safety Program Manual (**Appendix K**).

In addition to the use of diagnostic imaging, chiropractors apply Class 3B and Class 4 Low Intensity Laser as a therapeutic intervention.

### Alignment with federal legislation

As an ARHRA, the CCOA will not issue a registration certificate for any equipment that is not permitted for use in Canada. In addition, the CCOA may refer any matter of possible non-compliance with federal legislation to the federal regulator as appropriate.

### Limitations on registration agency authority

As a regulatory body, the CCOA may provide information or education to employers or other work site parties on practice matters beyond radiation health and safety, which is within its sphere of knowledge and scope. As an ARHRA, the CCOA will not create additional rules or withhold a registration certificate



for any item not directly applicable to the radiation equipment or the area of a facility in which the radiation equipment is installed.

If there is concern over a requirement put in place by the CCOA, the matter may be referred to an OHS Director for decision. If an OHS Director is of the opinion that the CCOA has exceeded its authority under the Program, that Director may require the CCOA, as the ARHRA, to remove the requirement and issue a registration certificate.

## Management commitment

The CCOA, as an ARHRA must fulfill the duties outlined in the Guide for Alberta's Radiation Protection Program (Guide), maintain its qualifications described in the Guide and fulfill its duties as outlined in the Director Order that designates the CCOA as an ARHRA. The CCOA is also responsible for fulfilling the "service provider" obligations under Section 7 of the *OHS Act*.

## Registration agency Manual

- The development and maintenance of a Registration Agency Manual
- Provision of the most recent version of the Registration Agency Manual to the Director

## Records management

- Maintenance of program records per the program reporting and information sharing requirements, including the following requirements.
  - Registration certificates must be retained for a period of ten (10) years from when they were issued. Once that period has concluded, the CCOA as a radiation registration agency may dispose of the program records in a secure manner.
  - Demonstrate to the Director what records were disposed, when they were disposed and how they were disposed.
  - Off-site records backup for all registration documentation.
  - All records (physical and electronic) will be stored in Canada.
  - No cost access to the Director in the format acceptable to the Director.

## Registration certificate

### Provision of registration certificate

The CCOA as an ARHRA may issue a registration certificate for radiation equipment only after confirmation through an inspection report, that the radiation equipment and the facility in which it is installed, or a code of practice for the radiation equipment, is compliant with applicable OHS legislation and any relevant requirements as described in this Guide. When issuing a registration certificate, the CCOA must:

- Produce registration certificates with the required information, as defined in the Guide.
- Never issue a certificate for longer than 5 years.



- Never use an inspection report older than 6 months.
- Always consider recommendations from the ARPIA on terms and conditions on registration certificates.

The CCOA, as an ARHRA, may:

- Make a registration certificate subject to any terms and conditions that the ARHRA considers appropriate for the protection of workers and other persons at or near the work site in which the radiation equipment is to be used, and:
- Vary, suspend, or revoke a registration certificate if:
  - the conditions under which the registration certificate was issued have changed;
  - the terms and conditions in an issued registration certificate have not been complied with;
  - the radiation equipment specified in the registration certificate has been sold, transferred, removed from service, or disposed of;
  - the operation of the radiation equipment listed on the registration certificate constitutes or may constitute a hazard to persons or is not permitted under federal legislation to be used in Canada;
  - a provision of the OHS legislation relating to the installation, use, operation, maintenance, or repair of radiation equipment has been contravened.
  - the regulated member has not demonstrated competency based on evaluation with the CCOA QAP, and continued operation of equipment
- At the discretion of the CCOA, issue a registration certificate with multiple pieces of equipment listed on a single registration certificate.
- Provide a 60-day extension to a registration certificate to allow an ARPIA sufficient time to complete their work.

As outlined in section 2.2 of the [Guide for Alberta's Radiation Protection Program](#), the CCOA as a self-governing profession may set radiation health and safety standards for the practice of its members and consider such standards when deciding to issue a registration certificate. Standards considered in radiation decisions by the CCOA include:

1. Whether the use of the radiation equipment is in the scope of practice for regulated members:
2. Is an approved diagnostic procedure: and,
3. The use of the equipment is considered in the Standards of Practice: and
4. The CCOA Radiation Health and Safety Program.

A valid registration certificate issued by the CCOA, an ARHRA, is recognized for the purpose of meeting the registration certificate requirements of Part 20 of the OHS Code.

### Suspension or revocation of a registration certificate

Only radiation equipment that has an active registration certificate may be used by regulated members. The CCOA may vary, suspend, or revoke a registration certificate if regulated members are not compliant with the profession's standards, including the Standards of Practice and Radiation Health and



Safety Program. The CCOA may vary, suspend, or revoke a registration certificate if an ARPIA reports that the equipment does not meet the required safety code.

The CCOA will enforce the College standards with regulated members and may act under Part IV of the *Health Professions Act (HPA)*.

The CCOA will work proactively with regulated members to achieve voluntary compliance with the Chiropractic Profession Standards. However, should compliance not be obtained, the College may suspend or revoke the registration certificate for equipment.

There is an expectation that regulated members will maintain their equipment according to Manufacturer Standards. The CCOA Radiation Health and Safety Program verifies that X-ray equipment is operating within manufacturer guidelines through the required X-Ray Annual Preventative Maintenance program. Failure to maintain equipment may result in the suspension or revocation of a registration certificate.

The CCOA may report the non-compliance to OHS with details on the worksite including address, contact information and information about the non-compliance, so that OHS can follow up where compliance activities may be needed.

## Operation of non-registered equipment

Regulated members must never operate radiation equipment that does not have an active registration certificate. This includes situations where a regulated member is filing an initial application for a registration certificate, or where a registration certificate has expired. Using radiation equipment without a valid registration certificate is a violation of the *Occupational Health and Safety Act* and the Occupational Health and Safety Code.

Should the CCOA become aware that radiation equipment is used without a registration certificate, the CCOA will report the non-compliance to OHS with details on the worksite including address, contact information and information about the non-compliance, so that OHS can follow up where compliance activities may be needed.



## CCOA service standards

The CCOA recognizes that within its role as an ARHRA that it must be reachable through the contact information that is published on the Government of Alberta's OHS website.

Service standard	Activity
10 Business Days	<ul style="list-style-type: none"> <li>• Respond to telephone calls</li> <li>• Respond to emails and other forms of communications from:               <ul style="list-style-type: none"> <li>○ Regulated members</li> <li>○ Other Radiation agencies</li> <li>○ Director</li> </ul> </li> <li>• Upon receipt of a complete application and a compliance report from an ARPIA, provide a registration certificate within 10 days of the application fee being paid.</li> <li>• With a complete submission of all requirements for Annual Preventative Maintenance (APM) provide a letter of confirmation that the APM is complete within 10 days of the application fee being paid.</li> </ul>
Exception to 10 business days	<ul style="list-style-type: none"> <li>• When the CCOA may be unreachable for more than 10 business days as part of a planned absence, the CCOA provides a Notice of absence to:               <ul style="list-style-type: none"> <li>○ Regulated members</li> <li>○ Other Radiation agencies</li> <li>○ Director</li> </ul> </li> <li>•</li> </ul>
30 business days	<ul style="list-style-type: none"> <li>• The CCOA must process radiation equipment application forms within 30 business days, unless additional processing time is needed due to findings of an ARPIA that requires corrective action.</li> </ul>
Exception to 30 business days	<ul style="list-style-type: none"> <li>• When the CCOA may be unreachable for more than 10 business days as part of a planned absence, the CCOA provides a Notice of absence to:               <ul style="list-style-type: none"> <li>○ Regulated members</li> <li>○ Other Radiation agencies,</li> <li>○ Director</li> </ul> </li> </ul>

The CCOA recognizes that should it no longer wish to be an ARHRA, it is required to provide the Director with 240 days of notice in writing by email to [LBR.RadiationProgram@gov.ab.ca](mailto:LBR.RadiationProgram@gov.ab.ca).

## Registration agency staff and subcontractors

The CCOA will ensure that their staff:

- understand this Program, their roles, and responsibilities under the Program, and are competent to perform their role; and,
  - are trained on applicable OHS legislation to the degree that is relevant to their role in the registration agency; and,
- understand the registration agency manual.



The CCOA as part of the management of this program will assess staff qualifications and implement a plan to ensure staff are competent to perform their roles under the Program.

## Program reporting

The CCOA will provide information about its services to the Director in a timely manner upon request by the Director. This may be either in relation to ad-hoc information requests or for annual reporting. Information requests may include, but are not limited to, information about agency or agency staff qualifications, information about individual inspections or registration certificates, and aggregate information about agency activity.

The CCOA will submit a Radiation registration agency annual report to the Director, which include, at a minimum, the information presented in Appendix C of the Guide. The reporting period for annual reports is per calendar year, and reports must be submitted to a Director by March 31 of the following year. Annual reports must be submitted by email to [LBR.RadiationProgram@gov.ab.ca](mailto:LBR.RadiationProgram@gov.ab.ca).

The CCOA will communicate Program information between agencies and with the Director to facilitate successful delivery of the Program. Program information includes, but is not limited to, information about individual inspections or registration certificates, and information about a work site's compliance with OHS legislation as it applies to radiation health and safety.

The CCOA may, in accordance with this Guide or with the approval of the Director, disclose information that the agency obtains while carrying out the functions of the agency. The CCOA may share information with other agencies; however, it is not obligated to share its proprietary or confidential business information when requested by another agency.

## Insurance

The CCOA will hold valid insurance including:

- general commercial liability: including personal injury, bodily injury, and property damage, \$2 million per occurrence;
- “all risks” valuable papers and records, usually a rider on the general liability policy, adequate to enable reconstruction; and
- Workers’ Compensation Board coverage.



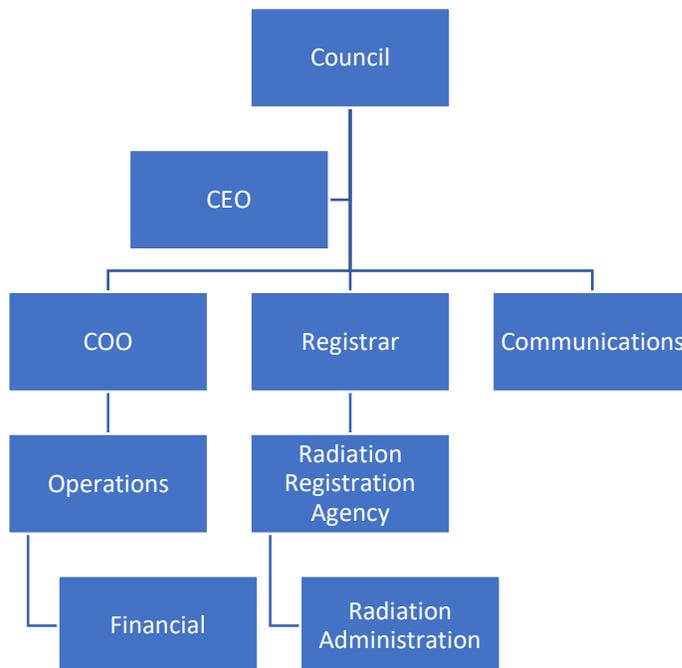
## Agency fees under the Radiation Health and Safety Program

Activity	CCOA Fee
X-ray Initial Registration	\$ 200
X-ray Renewal Registration	\$ 100
Laser Initial Registration	\$ 200
Laser Renewal Registration	\$ 100
Annual Preventative Maintenance (APM) review	\$ 0
Quality Assurance Program (QAP) review	\$ 200
QAP Re-review	\$ 200
X-Ray or Laser Transfer of Ownership	\$ 0

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## CCOA Organization Chart



## Guide to organization chart

- **Council** - the governing Council of the College of Chiropractors of Alberta
- **CEO** - the only employee of the Council and oversees the organization
- **COO** - responsible for all operations
  - **Operations** - responsible for financial programs including the Agency financials
- **Registrar** - oversees all regulatory programs and is responsible to ensure that the CCOA meets its commitments as an:
  - Authorized Radiation Health Registration Agency; including:
  - **Radiation Administration** – Staff who administer the Radiation registration agency Program described in the Radiation Registration Agency Manual.
- **Communications** – Strategic and tactical communications including direct to regulated member communications and website



## Information Systems

The CCOA, as an ARHRA, maintains an Excel data spreadsheet that contains all relevant information for equipment registered. This spreadsheet is maintained on a secure server and backed-up remotely within Canada daily.

The CCOA maintains a PDF of all documents used to issue a registration certificate including the registration certificate. The documents are stored on a secure server and backed up remotely within Canada daily.

The CCOA communicates to regulated members through iMIS which is the CCOA membership management database. The communication reminders for renewals and annual preventative maintenance originate in iMIS and an electronic copy is stored within the iMIS database under the regulated member's profile. The iMIS system is managed on a remote server in Ontario, where multiple redundant copies of the data are maintained.

Payment for the registration certification is made in the Members' Centre profile on iMIS. This receipt is time stamped and available for the regulated member to download from their Member's Centre. The iMIS system is managed on a remote server in Ontario, where a backup copy is maintained.



## Policies and procedures

### Laser policies

#### Standards of Practice 8.4 CCOA Radiation Health and Safety Program

##### **Adopted 10/2022, Effective 04/2023**

In compliance with the *Occupational Health and Safety Act* and the Occupational Health and Safety Code of Alberta, where ionizing radiation based diagnostic imaging equipment is owned by a chiropractor, the chiropractor must:

- Register the equipment with the CCOA
- Register all users of the equipment with the CCOA
- Operate (and ensure all users operate) the equipment in accordance with the CCOA Radiation Health and Safety Program

### X-ray policies

#### Standards of Practice 8.4 CCOA Radiation Health and Safety Program

##### **Adopted 10/2022, Effective 04/2023**

In compliance with the *Occupational Health and Safety Act* and the Occupational Health and Safety Code of Alberta, where ionizing radiation based diagnostic imaging equipment is owned by a chiropractor, the chiropractor must:

- Register the equipment with the CCOA
- Register all users of the equipment with the CCOA
- Operate (and ensure all users operate) the equipment in accordance with the CCOA Radiation Health and Safety Program

#### CCOA directive on Cone Beam Computed Tomography (CBCT)

##### **Adopted 06/2023, Effective 07/2023**

Chiropractors may own and register CBCT equipment. Chiropractors are NOT authorized to operate CBCT to image or scan patients. Chiropractors are NOT authorized to interpret three-dimensional volumetric scans produced by CBCT.

## Conflict of interest

The CCOA does not register its own radiation equipment and is currently exempt from the development of a conflict-of-interest guideline.



## Appendices

**Appendix A**

Class 3b & Class 4 Laser Registration Application

**Appendix B**

Registration Certificate

**Appendix C**

Laser Transfer of Ownership

**Appendix D**

Laser Five-Year Compliance and Registration Renewal Application

**Appendix E**

Class 3b & 4 Laser Deregistration

**Appendix F**

X-ray Facility Registration Application

**Appendix G**

X-ray Transfer of Ownership

**Appendix H**

X-ray Registration Renewal Application

**Appendix I**

Annual Preventative Maintenance (APM) Package

**Appendix J**

X-ray Facility Deregistration

**Appendix K**

Radiation Health and Safety Manual