

Changes to Article 175 of the New York City Health Code: Information for Dental X-ray Registrants

Article 175 of the New York City Health Code was repealed and re-enacted in May 2019. This fact sheet describes some, but not all, of the regulatory changes that affect **dental X-ray registrants**.

Registration:

- **You must identify a radiation safety officer (RSO) to oversee your facility's radiation safety program.** The RSO must be a dentist or a qualified medical physicist. You must list the RSO when initially registering your facility's dental X-ray equipment. [§175.10]
- **You are now allowed to use handheld X-ray equipment that is approved by and registered with the New York City Department of Health and Mental Hygiene.** You no longer need to request a variance (i.e., written approval from the Health Department to use handheld X-ray equipment). [§175.47(j)]

Inspections:

- Certified radiation equipment safety officers (CRESOs) inspect X-ray equipment for the Health Department. **CRESOs must inspect ALL registered, functioning dental X-ray units on site.** You cannot direct the CRESO to inspect some, but not all, of your facility's equipment. [§175.47(b)]

Training and Evaluation:

- **You must provide initial training and annual evaluations for X-ray operators.** Trainings and evaluations must cover positioning of the X-ray tube; image processing; operator location during X-ray exposure; source-to-skin distance; radiation protection; appropriate radiographic protocol; and relevant regulatory requirements.
- **You must maintain records of all trainings and annual evaluations** and provide them to the Health Department during inspections. [§175.49(a)(2)]

Equipment Requirements:

- Beginning on July 1, 2021, **low-energy X-ray units that operate at 50 kilovoltage peak (kVp) or less will no longer be allowed for clinical use.** [§175.04(a)(8)]
- **The Health Department established new requirements for using handheld X-ray equipment.** These requirements are in addition to the general requirements that apply to all radiation-producing equipment. [§175.49(f)]
- **The Health Department established new equipment kVp variance limits.** At a minimum, the kVp must be accurate to within 10 percent on variable kVp units and within 20 percent on fixed kVp units. [§175.49(n)]
- **Entrance skin exposure values for digital image receptors (including computed radiography) cannot exceed the regulatory dose limits established for E-speed film.** [§175.49(q)(4)]

To view Article 175, visit nyc.gov/healthcode and click on **175: Radiation Control**. If your facility also has a dental cone-beam computed tomography (CBCT) registration, see additional CBCT requirements described in §175.49(r).