



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Health

DIVISION OF PUBLIC HEALTH  
Section of Laboratories

Radiological Health Program  
5455 Dr. Martin Luther King Jr. Ave.  
Anchorage, AK 99507  
Main: (907)334-2101  
Fax: (907)334-2161

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Dear Alaska Dental Society,

I appreciate the time you took to explain to me some of the issues experienced by your members. Due to the number of complaints and confusion surrounding the purpose and goals of our Radiological Health Program and its implementation in the Alaskan dental sector, I'm providing this memo to deliver some updates that we hope you'll find helpful.

First, we are a regulatory program. We have delivered the same services to you as we have in other medical, veterinary, and industrial sectors across Alaska for many decades. That said, we understand that the dentists in Alaska have never received this level of oversight before and we want to be clear that we intend to uphold the laws that were designed to protect workers and patients when exposed to radiation. Protection isn't just radiation safety, it also includes the quality of images produced and used for diagnostic treatment of patients and, therefore, the quality of service provided to Alaskans.

Of the forty-nine (49) facility inspections we have conducted so far at dental clinics in Alaska, only two (2) are compliant with all requirements. It took additional time to work individually with these two clinics to produce documents that align with the regulations. We are finding that most clinics have been unsuccessful at obtaining annual calibration services or preventative maintenance. Most facilities have not retained any of their installation records, which is also a requirement. We expected to find deficiencies in these areas due to the lack of available vendors that are qualified to provide these services. We continue to assist in finding these professionals, called Qualified Medical Physicists (QMPs), or Qualified Experts (QEs), and design simple ways for them to register with our program through Smartsheet, our database.

It is, however, concerning that most dental clinics do not have active Radiation Safety Programs or Quality Assurance (QA) Programs. These are programs that can be built in-house and will greatly improve occupational and patient safety. We have identified this as a potential collaborative opportunity and have prepared policy and procedure templates that include the regulatory language to help guide practices.

Of the facilities inspected, 185 devices have been verified by state physicists. The device parameter checks we've performed have largely complied with only 2.2% of devices failing kVp accuracy, 11.4% of devices failing mAs linearity, and 13.5% failing exposure reproducibility. Stronger QA programs that include regular quality control checks on devices will allow dental offices to track performance issues such as these, which should trigger a repair/recalibration visit from the vendor.

In addition to these findings, there have been a lot of complaints about the inspection checklist. We have edited the checklist to be easier to read by the end user, not just the inspector, and we are preparing a website to host many resources for the dentists, including example policies and procedures. We have also received a resignation from Abdulai Kargbo, our Radiological Health Physicist 1 who implemented the program on behalf of the State of Alaska and newly passed legislation. We are down to two people in our program so we appreciate extra patience as we will need time to hire and retrain. Expect delays on future dental inspection scheduling.

We look forward to assisting all dental clinics in Alaska to become compliant with the regulations concerning their radiological practices. In this spirit, we are **extending the time for compliance to 1 year post your initial inspection date with quarterly updates on progress towards compliance**. Our intent isn't to penalize, but to improve the health and safety for all Alaskans. If you see a 30-day limit on our documents, that is in line with state regulations and our set timelines. Essentially, we are making an exception to our dental sector due to the amount of work that needs to be completed.

Let's work better together and raise the bar for dental clinics across Alaska. Please contact us at [doh.radiation.control@alaska.gov](mailto:doh.radiation.control@alaska.gov) if you have any questions. We look forward to working with you and all dental practices in Alaska.

Sincerely,

Handwritten signature of Jayme Parker in black ink.

Jayme Parker, PhD, MSPH, MB(ASCP)<sup>CM</sup>  
Chief, Section of Laboratories  
CLIA Director