

**To:** Representative Trevor Squirrell, Chair of the Legislative Committee on Administrative Rules  
**From:** Brendan Atwood, Public Health Policy Advisor for Vermont Department of Health  
**Re:** Radiological Health Rule  
**Date:** April 7, 2023

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The Vermont Health Department has made the following updates to the rule based on feedback we received from LCAR's Legislative Counsel.

- The following two sections in Part A have been updated in order to clarify the role of other health care practitioners:

8.2.6.1 *“Use of a radiation machine in the healing arts shall be by or under the general supervision of a Vermont-licensed veterinarian, physician, chiropractor, dentist, podiatrist, or other Vermont-licensed health care practitioner authorized to do so within their scope of practice.”*

8.9.1 *“Exposure under this Section of any human being to the useful beam shall be solely for healing arts purposes and only after such exposure has been authorized by a Vermont-licensed physician, chiropractor, dentist, podiatrist, or other Vermont-licensed health care practitioner authorized to do so within their scope of practice ~~who has met the requirements of Section 8.2.6.~~”*

- Several sections in Part B (1.2.6.4, 1.2.6.5, 12.6.2) were inadvertently not deleted from the clean version as they were intended to be (as reflected in the annotated version of the rule). Those sections in the clean version have been updated accordingly.
- Section 1.3.13 of Part B has been amended to clarify the Title of the federal regulation being referenced (10 CFR).
- Additionally, the following typographical errors were corrected:
  - Several sections were revised from “his/her” to “their.”
  - Section 3.4 – typo – updated to “means an individual...”
  - Section 3.29 – typo – removed the extra closed quotation mark at the end of the sentence.
  - Section 3.57 – changed “assuring” to “ensuring” to reflect proper usage.
  - Section 5.1.2 – Removed extra “the” from this section.
  - Section 5.5.1.2 – Indented this section for proper alignment.
  - Section 9.16.1.5.1.2 – “Medical Record Number” was made to be lower-case.
  - Section 12.1.1 – Added the word “and” for clarity.
  - Section 12.3.2.1.2 – Changed “shall have” to “has” to reflect proper usage.
  - Section 12.3.6.6 – Removed extra “the” from this section.
  - Capitalized “Rule” where appropriate throughout for consistency.