

Facilities with Lost/Misplaced or “No” Plans

X-ray Inspection Service

Who does this document apply to?

- A. Existing X-ray facility owners that have **lost** or misplaced their X-ray machine installation plan(s) (schematic “plan”) approved under the *Healing Arts Radiation Protection (HARP) Act*.
- B. New X-ray facility owners that have **recently purchased/acquired** an X-ray facility but do **not** have any HARP-approved plan in their possession **and** wish to obtain a new plan.
- C. New or existing facility owners that have been **issued an order under the HARP Act** by an X-ray inspector from the Ministry of Health’s X-ray Inspection Service (MOH-XRIS) that is related to a missing or non-compliant plan.

Who is responsible for maintaining facility records?

Ensuring proper record keeping of all facility documentation is of utmost importance for any X-ray machine owner and Radiation Protection Officer (RPO) appointed under the HARP Act. The owner is legally responsible for maintaining an up-to-date approved plan for their facility that accurately reflects the installation of all X-ray machines, including CT scanners.

Next Steps for Owners with Missing or “No” Plans

If you do not have an approved plan, it is in your best interest to submit a **new** application to our office at the X-ray Inspection Service (XRIS) of the Ministry of Health (MOH) for approval.

In addition, it is often determined that facilities undergo structural renovations or changes in machine installation over time—whether by the current or previous owner—which invalidate the original approved plan. In these scenarios, the *current* owner is responsible for rectifying the **unlawful changes** to an existing installation by submitting a new application to our office for re-approval which matches the current structural layout and machine installation (e.g., exact machine make/model).

For more information on submitting a new plan, refer to the plan application pamphlet which may be obtained from our office (see below). If you elect to submit a new application, the turnaround time for approval from our office is approx. **10 business days** (assuming 100% complete and ‘HARP-compliant’ submission).

Benefits of Submitting New Plan Application

The benefits of obtaining re-approval from the MOH—especially for facilities with outdated or missing plans—include the following:

1. In the **event of a sale of your facility**, a new up-to-date plan will be beneficial to you as the seller and to the purchaser because it forms part of your facility’s engineering records during the transfer of ownership.
2. A **new up-to-date approved plan** ensures your X-ray machine installation meets the minimum safety requirements prescribed under the HARP Act, such as by having the right amount of shielding to protect patients, workers, and the public against unnecessary radiation.
3. **Insurance purposes:** The plan provides key information regarding various shielding materials such as the **location and quantity of lead**.
4. It results in a conversion to an **electronic (digital) version** as well as consolidation of multiple plans into one plan for easy record keeping (where applicable).
5. It mitigates the risk of an order (including an **emergency or “stop-use” order**) issued by an **XRIS Inspector (MOH)** under the *Healing Arts Radiation Protection (HARP) Act* for the non-compliant installation. Moreover, an **Inspector from the Ministry of Labour**, Immigration, Training and Skills Development may request a copy of an up-to-date plan from your facility.

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What is an “approved plan”?

Under Section 3 of the HARP Act, written approval from the Director of X-ray Safety at the MOH (“Director”) is required prior to installing an X-ray machine (including CT scanner) or prior to making any changes to an existing approved installation. An approved plan is a schematic floorplan that has been approved by the Director—which reflects both the actual X-ray machine installation and facility layout including the amount of proposed structural shielding—in compliance with the minimum standards under the HARP Act in the interest of patient, worker, and public safety. To obtain approval, an application along with the floorplan must be submitted to our office for technical evaluation and compliance with the HARP Act (see below). Plans are typically submitted by third-party agents with technical subject-matter expertise, on behalf of X-ray facility owners.

Requesting a Copy of Previously Approved Plans

If you are seeking a copy of a previously approved plan for an existing facility to which **you initiated the application**, it is recommended to follow these steps:

1. Contact the third-party company or agent responsible for drawing and/or submitting the original plan.
2. **Contact the X-ray machine installer** if different from third-party plan submitter (see #1).
3. Contact the previous or original owner of the X-ray facility (if applicable). This step is particularly relevant during the purchase/sale of an X-ray facility as part of the buyer’s due diligence.

If you have exhausted the above applicable options, contact our office for further guidance (see below). Be advised that any facility records available at the MOH may **not** be up-to-date nor reflect the current installation of the X-ray machine at the facility. If a facility’s current installation is non-compliant, obtaining a copy of a previously approved plan **on its own will not automatically** bring a facility into compliance with the HARP Act (see “*Next Steps for Owners with Missing or No Plans*”).

How do I apply for approval of an X-ray or CT Plan?

1. First thoroughly review the “**Plan Information**” Pamphlet available from XRIS via e-mail (see below).
2. Download the application (Form 2 and Form 3) at: www.forms.ssb.gov.on.ca.
 - A. To download **Form 2**: Search for “Form 2 X-ray”.
 - B. To download **Form 3**: Search for “Form 3 X-ray”.
3. Submit the following completed application package to xrisplans@ontario.ca:
 - A. The **schematic floor plan** (“Plan”). Refer to “Plan Information Pamphlet” for specific technical requirements on the Plan.
 - B. Completed **Form 2** – “Application for Approval of X-ray Installation”.
 - C. One completed **Form 3** – “X-ray Equipment and Shielding Specifications” - for each X-ray machine or CT scanner.
 - D. **The Fee** (if applicable): Scanned copy of the certified cheque or money order in the amount of \$360, payable to the Minister of Finance.
4. Refer to the “Plan information” pamphlet for additional submission requirements.

Contacting XRIS

If you have further questions after reviewing this guidance document, you may contact us as follows:

- For general enquiries, e-mail xris@ontario.ca or phone 416-327-7937.
- For submission of X-ray plan applications, e-mail xrisplans@ontario.ca.