

Policy: Pregnancy and Voluntary Disclosure

Rev. Academic years 2011-12, 2012-13, 2019-20

It is the policy of the radiation therapy program to comply with all licensee, state, and federal regulations regarding disclosure of pregnancy by radiation therapy students and to make every effort to ensure the radiation exposure to a declared pregnant student and fetus is kept as low as reasonably achievable (ALARA).

If a female student becomes pregnant, she is urged to notify the program director in writing as soon after conception as practical. Disclosure of pregnancy status is voluntary. The procedure for voluntary disclosure is outlined below:

Procedure:

1. If the student chooses to disclose her pregnancy, the notification must be in writing and shall include the estimated date of conception and projected due date (a voluntary disclosure form is included in the appendix for convenience).
2. The program director will immediately notify the RSO to ensure a safe environment for the developing fetus relative to the student's clinical activities.
3. If a declared pregnant radiation therapy student is able to continue with the clinical portion of the program, she will be issued an additional radiation dosimeter to be worn at waist level at all times while in the clinical rotation areas. This dosimeter will monitor dose to the fetus. The regularly issued dosimeter should continue to be worn at collar level to estimate the student's radiation dose.
4. The student will meet with the program director to discuss educational options. Each declared pregnant student will be handled on a case-by-case basis. Educational options include, but are not limited to, the following:
 - a) Continue both the didactic and clinical portions of the program without modification.
 - b) Continue with the didactic and clinical education portions of the program but with altered clinical rotations to ensure the lowest possible radiation dose to the developing fetus.
 - c) Continue with the didactic portion of the program and take a clinical leave-of-absence, with continuation of the clinical portion of the program following delivery and medical clearance.
5. The RSO will closely monitor both student and fetal exposures. The Illinois Emergency Management Agency (IEMA) limits the dose to the embryo/fetus to 500 mrem (5 mSv) for the gestational period with a monthly limit of 50 mrem (0.5 mSv). Because radiation therapy students and staff typically receive minimal exposure, any exposure in a month above 5 mrem will result in an investigation and subsequent conference among the student, program director, and RSO to re-evaluate continuation with clinical activities relative to the risk of radiation exposure if indicated. Radiation exposure in excess of the regulatory limits described above will result in discontinuation of any clinical rotation activities until after delivery.
6. Students who choose to take a leave of absence are required to provide written verification from her obstetrician clearing her to return to clinical assignments. Upon clearance, the student may resume her studies and will be assigned to missed clinical areas in order to ensure

completion of all necessary competencies and equitable learning opportunities (see also Leave of Absence Policy).

7. In accordance with the Nuclear Regulatory Commission (NRC) guidelines, any declared pregnant student may “*undeclare*” her pregnancy at any time (withdraw declaration). In order to “*undeclare*” pregnancy, the student must submit a written withdrawal of declaration to the program director (a form is included in the appendix for convenience).
8. Regardless of the educational option the student chooses, all academic, clinical, and attendance requirements must be met for program completion.

Additional Guidelines to be Followed:

- No declared pregnant radiation therapy student will be terminated from the program or ordered to take a leave of absence (unless specifically instructed to do so by her physician).
- The ultimate decision on what educational option to be taken belongs to the student.
- If a student chooses to withdraw from the program, she may be reinstated into the program the following year to complete the remainder of her program sequence. Upon re-entering the clinical environment, the Program Director and Clinical Supervisor will re-evaluate the student’s clinical competencies. Repeat and/or additional remedial work may be required.
- Time missed from the program must be made up in terms of clinical hours before certification of graduation will be awarded. Make-up hours will be completed in the specific rotation area(s) missed (*see Clinical Make-up Policy*).
- By the use of established protective measures, students who elect to continue normal duties may do so with the assurance that the fetus is well protected from radiation effects.

Program Responsibilities:

- The program shall coordinate a safe working environment for the pregnant student.
- The RSO shall be advised of any declared pregnant students and shall closely monitor the monthly student and fetal radiation exposure reports.
- The RSO shall review the following with the student:
 - Nature of potential radiation effects associated with in utero exposure
 - Regulatory limits established by the NRC (Nuclear Regulatory Commission) and NCRP (National Council on Radiation Protection)
 - State of Illinois Rules and Regulations for declared pregnant workers
 - NRC regulatory guide 8.13
 - Required measures to be taken throughout the term of the pregnancy
 - Records of this counseling session will be maintained by the Radiation Safety Office

Declared Student Responsibilities:

- Strictly adhere to safe radiation practices, policies, and guidelines. Any breach of these policies will be met with corrective action.

- Wear two radiation monitoring devices, one placed on the collar and one (designated as fetal) at waist level centered over the abdomen for fetal monitoring. Readings will be closely monitored by the Radiation Safety Officer

This policy is available on the program's website and all students will be made aware of this policy during program orientation

Note: All related forms can be found in the appendix

Student Voluntary Pregnancy Declaration Form
Northwestern Memorial Hospital
School of Radiation Therapy

Student Name: _____

Date of Declaration: _____

In accordance with the NRC regulations 10 CFR 20.128, I am voluntarily declaring that I am pregnant.

- My estimated date of conception is: _____
- My estimated date of delivery is: _____

In making this declaration, I understand that I will be issued a fetal dosimeter to be worn during all clinical activities throughout the duration of my pregnancy. I understand that IEMA limits the dose to the embryo/fetus to 500 mrem (5 mSv) for the gestational period with a monthly limit of 50 mrem (0.5 mSv). I also understand that meeting the lower dose limit will require discontinuation of any clinical rotation activities until after delivery.

Furthermore, I understand that documentation must be obtained from my Obstetrician outlining duty restrictions (if applicable) including permission to continue with my program of study. This documentation shall be submitted at the same time as the declaration. I further understand that, at all times, the specific recommendations of my Obstetrician will be followed by the program in an effort to protect my health and the health of the embryo/fetus.

As outlined in the Pregnancy and Voluntary disclosure policy, educational options include, but are not limited to the following (select one):

1. Continue both the didactic and clinical portions of the program without modification.
2. Continue with the didactic and clinical education portions of the program but with an altered clinical rotation scheduled to ensure the lowest possible radiation dose to the developing fetus.
3. Continue with the didactic portion of the program and take a clinical leave-of-absence, with continuation of the clinical portion of the program following delivery and medical clearance.
4. Other (specify):

I have read the radiation therapy program's policy on pregnancy and will abide by all rules and regulations presented in this policy. I understand that I may withdraw my declaration at any time and for any reason prior to the end of my pregnancy.

Student Signature: _____

SSN: _____

Acknowledgement of Receipt of Declaration

Program Director Signature: _____

Date of receipt: _____

*Note: The student will receive a copy of this declaration once all signatures are obtained. The original will be maintained in the student's administrative file.

**Student Withdrawal of Pregnancy Declaration Form
Northwestern Memorial Hospital
School of Radiation Therapy**

Student name: _____ Date of withdrawal: _____

In accordance with the NRC regulations 10 CFR 20.128, I wish to withdraw my initial disclosure of pregnancy.

- The date of my initial disclosure was: _____

In making this withdrawal, I understand that the lower radiation dose limit for the embryo/fetus will no longer apply and that the additional fetal dosimeter will no longer be utilized.

If pregnant and voluntarily withdrawing my declaration of pregnancy, I hereby release the radiation therapy program and clinical rotation facilities of any responsibility for embryo/fetal exposure.

Student signature: _____

Social Security Number: _____

Acknowledgement of Receipt of Declaration Withdrawal

Program Director signature: _____

Date of receipt: _____

Note: The student will receive a copy of this declaration once all signatures are obtained. The original will be maintained in the student's administrative file.