

Guidance for the [Notice of Proclamation of Disaster Emergency issued on March 22, 2020](#) - Iowa Code 136C reference

Proclamations of Disaster Emergency issued by Governor Kim Reynolds on March 22, 2020, and April 2, 2020, temporarily suspend regulatory provisions of Iowa Code 136C and the Department's rules implementing that chapter which relate to continuing education requirements and licensure renewal requirements, until April 30, 2020. Agencies are directed to provide guidance to licensees related to any changes in requirements for licensing that will be implemented under this proclamation authority. Please note that all regulatory requirements remain in effect unless changes or waivers are specifically outlined by the Iowa Department of Public Health in guidance or rulemaking. The guidance in this information notice outlines the specific rules with waivers implemented pursuant to the suspension authorized by the Proclamations. The Department is continuously monitoring the COVID-19 situation and additional guidance will be issued as the COVID-19 situation changes or additional direction is provided in future proclamations.

1. The proclamation allows physicians to interpret mammography exams and stereo breast biopsies, technologists to perform mammography and stereo breast biopsies and medical physicists survey mammography units, stereo units, and reading work stations (RWS) even if they do not meet the continuing education and continuing experience requirements as stated in Iowa Administrative Code (IAC) 641 - 41.6(3)a(2); 41.6(3)b(3) & (4); 41.6(3)c(3) for mammography and 41.7(3)a(2); 41.7(3)b(2); 41.7(3)c(2); 41.7(3)d(2); 41.7(4)c; 41.7(5)c for stereotactic breast biopsies. The Notice of Proclamation shall expire on April 16, 2020, at 11:59 p.m. unless sooner terminated or extended in writing by Iowa's governor, Kimberly K. Reynolds.

If a facility finds it is in the situation where they will not meet any of the continuing requirements referenced above due to coronavirus, the facility will need to document why the continuing requirement will not be met and have it available for review on the facility's annual inspection (e.g. *technologist name* will drop below the required 200 exams in the previous 24 months due to the coronavirus and the facility's decision to cancel screening patients starting on *mm/dd/yyyy* - add in end date when it is known).

2. The proclamation allows extension of annual medical physics surveys for mammography/stereo units and RWSs as stated in Iowa Administrative Code 641 - 41.6(5)k(8) for mammography and 41.7(7)g for stereotactic breast biopsies. The Notice of Proclamation shall expire on April 16, 2020, at 11:59 p.m. unless sooner terminated or extended in writing by Iowa's governor, Kimberly K. Reynolds.

If a facility finds it is in the situation where they will not meet the annual survey (14 months from the previous survey) for units or RWSs, the facility will need to contact the mammography program prior to 14 months to request an extension. The facility needs to state why they are unable to meet the requirements (e.g. the medical physicist is unable to travel due to coronavirus and our annual survey is due by *mm/dd/yyyy*).

If you need to request an extension for your annual medical physicist survey or have any other questions, contact Kellee Kemp, [Kellee.kemp@idph.iowa.gov](mailto:Kellee.kemp@idph.iowa.gov) and Gina Fuller, [gina.fuller@idph.iowa.gov](mailto:gina.fuller@idph.iowa.gov).

Note that this is different from Food and Drug Administration (FDA) currently who has granted a blanket 2 month extension. [FDA Information Related to COVID-19](#)

3. All other IAC regulations in regards to mammography and stereotactic remain in effect.

If you are operating a mammography unit, stereotactic breast biopsy unit, or RWS even one time a week, quality control (QC) needs to be done as usual. Weekly QC test can be done on any day of the week (defined as Sun through Saturday).

4. Facilities that choose to cease operations due to the coronavirus should document the period in which they are not performing mammography and ensure all required quality control testing is performed **prior to resuming operations**. This includes the annual medical physicist survey or other quality assurance duties **which may have been required during the closure period**. [FDA Information Related to COVID-19](#)
5. For any circumstance due to coronavirus which the facility cannot control and that could lead to non-compliance citations, the facility should be prepared to provide detailed documentation. Examples may include (1) the failure of mammography personnel to meet the continuing education requirement due to cancellation of courses/meetings due to coronavirus; and (2) the failure to meet certain aspects of EQUIP due to staffing absences related to coronavirus. [FDA Information Related to COVID-19](#)