

To: Tanning Operator Training Consultants
From: Catherine Rosfjord, Tanning Branch Manager
Re: Criteria for Online Operator Trainings
Date: August 1st, 2012

Radiation Protection Section (RPS) has the authority to approve all Tanning Operator Certification Trainings offered in North Carolina. The objective of RPS is to approve courses that train operators to minimize the risks of UV radiation exposure. The guidelines below have been developed to assist trainers in meeting that objective and to gain approval of their course materials. All operator training courses must be submitted to and approved by RPS prior to being offered to the public. RPS must be notified of any future changes to course materials.

Guidelines for Developing Online Operator Training Course:

Must not Include:

1. Statements which imply indoor tanning has health benefits. This includes, but is not limited to: mention of the historical uses of UV light for medical purposes such as treating lupis, TB, or any "heliotherapy". You may not discuss the health benefits of Vitamin D or state that UV light is "necessary" for the production of Vitamin D.

It is permissible to state the medical reasons an individual may visit a salon. The discussion must include the following information: If an individual is referred by a physician with a written prescription, the prescription should explicitly state the duration of exposure and type of bed to be used. The prescription and any other medical records must be properly protected under HIPPA laws. If an individual does not have a written prescription from a doctor, but informs the operator of a desire to tan to alleviate a medical condition, the only acceptable course of action is to tan the customer as would be done *for cosmetic purposes*: accurately skin type the customer and follow the labels on the tanning unit. Any other course of action would be considered "treatment" which is not permissible.

2. Any statement which implies that indoor tanning is healthier or safer than outdoor tanning.
3. Any statement which implies tanning provides "protection" against sunburn. It is permissible within the discussion of how UV light affects the skin to state that exposure to UV light creates melanin which, upon subsequent exposures to UV, *may reduce the risk of sunburn*. What is not permissible is listing "sunburn protection" or "vacation insurance" as one of the reasons someone might want to tan indoors.
4. Any statement which implies that there is not a causal relationship between UV light and melanoma.

5. Any marketing or promotional statements for indoor tanning. This includes, but is not limited to: the ability to tan year round, receiving a known amount of UV exposure, sunburn protection, convenience, privacy, unlimited tanning, or listing any of the reasons someone might choose to tan indoors.

Must Include:

1. At a minimum, the curriculum must cover 1) procedures for correct operation of the tanning facility and tanning equipment; 2) recognition of injury or overexposure to ultraviolet radiation; 3) the tanning equipment manufacturer's procedures for operation and maintenance of the tanning equipment; 4) the determination of skin type of customers and appropriate determination of duration of exposure to registered tanning equipment; and 5) emergency procedures to be followed in case of injury.
2. Some way of ensuring that the course material is, at a minimum, opened and viewed before the test is administered. Our preference is that the material is broken down into multiple sections, each of which must be viewed before the test is administered.
3. Acknowledgement Statement in which the student attests that they are the person taking the test.
4. Pool of at least 100 test questions, where each test consists of at least 50 randomly generated questions. Subsequent tests must have a new set of 50 randomly generated test questions to deter cheating. A minimum score of 80% is required to pass. The student may attempt to pass the test up to 3 times and will then receive a failing grade.
5. At least one of the following statements must be included at some point in the training:
 - The International Agency for Cancer Research classified UV-emitting tanning devices as "carcinogenic to humans" in July, 2009. (IARC; http://www.iarc.fr/en/media-centre/iarcnews/2009/sunbeds_uvradiation.php)
 - Exposure to UV, either naturally from the sun or from artificial sources such as sunlamps, is a known risk factor for skin cancer. (World Health Organization; <http://www.who.int/mediacentre/factsheets/fs287/en/>)
 - Additional exposure to UV from sunbeds is likely to enhance the well-known detrimental consequences of excessive solar UV exposure. (World Health Organization; <http://www.who.int/mediacentre/factsheets/fs287/en/>)
 - There is no evidence to suggest that UV exposure from any type of sunbed is less harmful than UV exposure from the sun. (World Health Organization; <http://www.who.int/mediacentre/factsheets/fs287/en/>)
 - There is a widespread false belief that a tan acquired using a sunbed will offer good skin protection against sunburn for a holiday in a sunny location. In reality, a tan acquired using a sunbed offers only limited protection against sunburn from solar UV. It has been estimated that a sunbed tan offers the same protective effect as using a sunscreen with a sun protection factor (SPF) of only 2-3. (World Health Organization; <http://www.who.int/mediacentre/factsheets/fs287/en/>)

- Melanoma is the second most common cancer in women ages 20 to 29 in the United States. Older white men have the highest mortality rates from melanoma. Melanoma is the sixth most common cancer in men and women. (Cleveland Clinic;
<http://www.clevelandclinicmeded.com/medicalpubs/diseasemanagement/dermatology/cutaneous-malignant-melanoma/>)
6. A link to NC state tanning regulations <http://ncradiation.net/Tanning/rules/sec1400index.htm> . A link to the RPS website page on <http://ncradiation.net/Tanning/guides.htm> where you will find the required Consumer Statements, Consumer Injury Reports, Warning Signs, and will also find examples of Consumer Records, Maintenance Logs, and Inspection Highlights. All these forms will assist the operator in passing inspections.
 7. A separate NC specific test which the student must take and pass (80%) in order to receive the trained operator certificate. NC specific test must consist of 15 randomly generated questions. Subsequent test attempts must have a new set of randomly generated questions. The student may attempt the test up to 3 times. Contact Catherine Rosfjord for set of test questions.
 8. Consistent use of the term “tanning operator” or “operator” as opposed to “tanning consultant”, “tanning service representative”, or any other term. Consistent use of the term “Consumer Statement” as opposed to “Customer Release Form” or any other term.
 9. Trained Operator Certificate must indicate that the course was taken online.

Please let us know if you have any further questions.

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