

X-ray Advisory Committee Meeting

MEETING MINUTES

Date: May 30, 2017

Location: Orville Freeman Building
645 Robert St. N.
Saint Paul, MN 55155

Attendees: Beth Schueler (Medical Physicist), Brian Hall (Service Provider), Dan Lind (Service Provider), Frank Zink (Medical Physicist), Julie Sabo (MN Nursing Board), Louis Saeger (MN Medical Association), Michael Lewandowski (Health Physicist/CHP), John Wohlhuter (MN Association of Nurse Anesthetists), Richard Giese (Medical Physicist/PhD), Ronnell Hanson (MN Radiological Society), Vinton Albers (Chiropractic Association), William Duppler (Medical Physicist).

Via conference call: Bridgett Anderson (MN Dental Board)

Absent: Tony Murphy (Medical Physicist)

MDH: Craig Verke, Jacquie Cavanagh, Kelly Medellin, Mary Navara, Patricia Winget, Teresa Purrington

Welcome and Introductions

Mary Navara, Indoor Environments and Radiation Manager

Mary welcomed everyone.

Teresa Purrington, X-ray Program Supervisor

- Went through the agenda, relayed the rules of the meeting, and stated that the meeting minutes will be online. She stated this will be the last meeting focused on definitions. Next meeting will focus on the dental provisions, which will be available online.
- Cancelled the June 29, 2017 Advisory Committee Meeting. Next meeting will be July 26, 2017.
- Stated that Kathryn White and John Wohlhuter will work together jointly as committee members for MN Association of Nurse Anesthetists.

Definitions

Jacquie Cavanagh, Section Policy and Rules Analyst

Cavanagh went through Preface of Definitions 4732.0110 v4. Asked for any comments or concerns with Definitions for "B" through "K" that were reviewed previously, and moved on with Definitions beginning with the letter "L".

Subp. 25. Calibration.

Cavanagh stated that consensus was to split up this definition into “calibration” and “equipment performance evaluation (EPE)”. Richard Giese (Advisory Committee Member, ACM) questioned whether items A and B should be in EPE. Giese said that EPE involves checking the performance of the device. Michael Lewandowski (ACM) agreed and suggested calling this “maintenance activities”, and suggested another definition outside of EPE. Purrington asked the committee to review this subpart and subpart 91a, Install or installed, and provide comments to MDH.

Subp. 64. Facility.

Lewandowski questioned this definition. Cavanagh stated that there was a good discussion about it last time and noted that it still needs work. MDH has not received additional feedback.

Subp. 98. Lead equivalent thickness.

Amend. No further comments.

Subp. 102. Light field.

Amend. Plain language edits with this definition. Giese stated new language doesn't appear to be in draft. The existing definition is consistent with Suggested State Regulations for Control of Radiation (SSRCR).

Subp. 107. Medical event.

Amend. Giese stated this isn't in agreement with SSRCR. The word "unintended" is missing. Purrington stated pieces missing from the SSRCR will be incorporated in the specific rule parts, but agreed that unintended should be added in.

Subp. 116. Occupational dose.

Repeal. Giese questioned this. Cavanagh stated that MDH intends to include the definition in specific rule parts. Purrington stated these specific rule parts will be referenced within the rule.

Subp. 119. Patient.

Amend. Lewandowski had a comment about adding the word treatment.

Subp. 122. Person.

Cavanagh stated that there was no change to this definition.

Subp. 123. Personal protective equipment or PPE.

Amend. Cavanagh asked the committee for their thoughts on using the word absorbing versus attenuating. Giese agreed with absorbing and stated it might be best for plain language. Cavanagh agreed that plain language would be best and MDH will use “absorbing” instead of “attenuating”.

Subp. 124. Personal monitoring dosimeter.

Repeal. Cavanagh stated this definition is now included elsewhere in the Definitions.

Subp. 124a. Personal supervision.

Amend. Cavanagh stated this is a new definition. Frank Zink (ACM) disagreed with the word “physician”, and suggested “qualified practitioner” instead. Beth Schueler (ACM) stated the

Conference of Radiation Control Program Directors (CRCPD) adds “or adjacent control area”. Purrington stated that they will review CRCPD. The definition of “Direct supervision” will also be reviewed with service provider provisions.

Subp. 125. Phantom.

Amend. MDH will revise the definition so that it is with SSRCR.

Subp. 129. Positive beam limiting or limitation or PBL.

Repeal. MDH will add the language of this definition in the specific rule parts.

Subp. 136. Protective barrier or barrier.

Repeal. Zink stated the definitions are not exclusive and can overlap. If it attenuates or absorbs it's a barrier, this might need to be clarified. Dan Lind (ACM) stated when he thinks of a protective barrier, he thinks of something permanent. Purrington stated MDH will review this comment.

Subp. 138a. Qualified medical physicist or QMP.

Amend. Purrington stated that “QMP” will remain in definitions but the requirements provisions for a “QMP” will be incorporated into a specific rule part. Lewandowski stated that service provider should be included in this definition. Purrington stated that MDH will look at this with the service provider provisions review.

Subp. 138b. Qualified operator or operator.

Amend. Cavanagh stated this is a new definition. Lewandowski asked if there will be a separate definition for non-human use or analytical x-ray. Purrington stated the Industrial Focus Group will review the definition in the context of it applying for both human and non-human use. Zink questioned the statutory reference in this definition.

Subp. 139. Quality assurance program.

Amend. Cavanagh asked Giese to follow-up with this comment for this definition. He questioned the word “manual”. Cavanagh stated that this word might be outdated and MDH will review. Zink agreed that it undermines the concept when referred to as simply a “manual or reference book”, and not the whole program. Louis Saeger (ACM) stated that a set of activities might be added.

Subp. 140. Quality control.

Amend. Giese suggested that it shouldn't apply to solely to image quality but include corrective action for image performance.

Subp. 146. Radiation head.

Amend. Cavanagh stated this will be defined in the radiation therapy chapter 4733.

Subp. 148a. Radiation safety committee.

Amend. Cavanagh stated this is a new definition. Zink stated the definition doesn't encompass all the reasons to have a radiation safety committee. Purrington responded that MDH understands there may be x-ray equipment in the future that's not included in this definition. Zink stated that MDH might consider referencing higher risk or dose modalities, and not list them specifically. Ronnell Hansen (ACM) agreed that the definition should be broader. Saeger expressed concern about smaller

facilities outside a larger organization that will be required to form a radiation safety committee with limited staff.

Giese commented that the duty or charge of achieving “lowest radiation dose possible” is an unrealistic expectation of a committee. Hansen stated that this isn't a normal function of a committee, but rather for qualified individuals. Schueler suggested the committee defer this discussion until this part of the rule. She also questioned the name “radiation safety committee”. Purrington stated that this naming is consistent with the Radioactive Materials rule provisions. Zink suggested revising the definition to include promoting ALARA and its general principles. Purrington stated the committee will review this definition at a different time, and the general idea of this definition is to foster a safety culture regardless of the size the clinic or institution.

Subp. 159. Registered radiologist assistant or RRA.

Amend. Zink stated that the definition is not consistent with subpart 152a and to incorporate it in specific rule parts or keep in definitions.

Licensed Practitioner of the Healing Arts Discussion

Jacquie Cavanagh, Section Policy and Rules Analyst

- MDH has received more than 250 emails about: 1) adding Advance Practice Registered Nurse (APRN) to this definition and 2) APRN scope of practice involving the operation of x-ray equipment.
- MDHs regulatory purpose is to ensure the safe use of x-ray equipment by x-ray operators to minimize the risk of unnecessary exposure to ionizing producing radiation for x-ray operators, patients, and the public.
- MDH does not have the authority to amend the scope of practice of professions governed by other licensing boards. MDHs rules are concerned with the safe operation of x-ray equipment and ensuring that x-ray operators have the proper training in order to operate the x-ray equipment.
- We all share a common goal of safety. MDH ensures this safety through training.
- The definition needs to be updated, and defined in the rules who can use certain x-ray equipment and their training requirements. May need to start from scratch with this definition or go a different route.
- Hansen agreed it might be a good idea to go a different route that defines specific qualifications and emphasizes training. Julie Sabo (ACM) stated that this an obsolete term and suggested looking at training and competencies required for operators. Giese agreed that this term is outdated and it shouldn't be expected that this group understands or is trained in radiology. Sabo asked if the “healing arts” definition would need to be amended. Hansen said it’s important to know what MDH can do to enforce this. Lind stated that continuing education should be a part of this as well. Cavanagh thanked everyone for the discussion and stated that MDH will work with the committee to arrive at a solution.

Public Comments

Teresa Purrington, X-ray Unit Supervisor

Purrington asked for any public comments.

- Owen Schunk. Expressed interest in the scope of definition for diagnostic imaging services. Asked if physician assistants can order tests/examinations? He also questioned the definition of

“supervision” either direct or in person. To be in the building is unrealistic for portable. Purrington stated this is specifically for fluoroscopy.

- Jeremy Hulteen. Asked if a mobile shield is considered a personal barrier? If you're in the exam room, you have to have an apron on. Purrington stated this is being reviewed.
- Renee Dahring. Submitted a letter to add APRNs to the definition of “licensed practitioner of the healing arts”.
- Dianne Willer-Sly. Submitted a letter of support for adding APRNs to definition. Safety of people running the x-ray equipment is important.
- Jeffrey Brunette. Some of his questions have been answered, except qualified medical physicist.

Adjournment

Teresa Purrington, X-ray Unit Supervisor

Sabo asked about the next steps. Purrington stated she would like the committee to provide some resources and suggestions for the definitions. Hansen asked MDH to let the committee know what is enforceable by MDH. Cavanagh stated the next version of the definitions will be available online after we received additional input from committee members.