

X-ray Dental Focus Group

MEETING MINUTES

Date: February 24, 2017

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

Attendees: Dr. Frederick Nolting (MN Dental Association), Bridget Anderson (MN Board of Dentistry), Henry Perez (Patterson Dental), Colleen Brickle (Normandale Community College Dean)

Via conference call: Dr. Teresa Johnson (RSO, Apple Tree Dental), Clare Larkin (MDH Oral Health Program)

Welcome and Introductions

Mary Navara, Indoor Environments and Radiation (IER) Manager

- Introduced herself, MDH staff, and thanked members for participating.

Teresa Purrington, X-ray Unit Supervisor

- Thanked the group for their time and volunteering their expertise.
- Stated the draft rules and related information are available on the X-ray Rules website.
- Asked group members to introduce themselves.

Rules Overview and Role of Focus Group

Jacque Cavanagh, IER Section Policy and Rules Analyst

- Introduced herself and described her role.
- Stated that chapter 4732 is a large rule chapter and so to manage the process, Minnesota Department of Health (MDH) will create modality-specific focus groups to inform the rule development process.
- Explained that the focus group is not a decision making body, looking for advice and consensus, where possible, from the group.
- Described the “Fist to Five” measurement of consensus. For consensus measurement, group will signal with a full fist if they do not agree, and open palm/five fingers if they do agree. Will use this method to gauge the feelings of the group members when making decisions.
- Gave a brief overview of the rule adoption process and mentioned that the timeline is available on the website.

Teresa Purrington, X-ray Unit Supervisor

- Introduced additional MDH staff present and their roles.

Dental Rule Parts Review

Jacquie Cavanagh, IER Section Policy and Rules Analyst

Teresa Purrington, X-ray Unit Supervisor

- Clarified that not all provisions in the rule parts will be under the purview of the focus group; only those that are specific to dentistry for human use.
- Jacquie and Teresa went through each rule part in turn.

4732.0220. General Requirements for all Facilities.

Syntax change, to edit and clean-up the language. Dr. Teresa Johnson, focus group member, (FGM) asked a question regarding shielding and subpart 3. Purrington stated that this is out of scope for dental review, but encourages comments of that nature be directed to the request for comments process.

Dr. Johnson had a comment about deleting intraoral capabilities in subpart 4. She expressed concern that registrants may feel they can skip the shielding plan. Purrington stated that adding the word “only” will be reviewed.

4732.0305. Prohibited Uses.

Radiography units” is replaced with “x-ray system”. Purrington asked the group if they see intraoral units greater than 50 kvp in the field. Dr. Fredrick Nolting (FGM) stated that some of the older models do register at 50 kvp, specifically the Heliodont 50 unit.

4732.0306. Unauthorized Uses.

MDH intends to repeal Item A which currently prohibits use of hand-held imaging devices.

Purrington asked the group if dental fluoroscopic systems still exist. Bridgett Anderson (FGM) stated that these systems are no longer in use and the focus group affirmed.

4732.0360. Shielding Plan.

MDH does not intend to change shielding for intraoral systems in subpart 5. The focus group agreed to the change.

4732.0365. Additional Shielding Requirements.

There are comparable requirements in other rule parts. Purrington asked if MDH should refer to this rule part or keep the requirements in multiple places. Dr. Nolting and others stated wherever it would be most clear for the person reading it. Purrington asked the group to review this rule part and provide an email of comments for the next meeting.

4732.0535. Retake or Reject Analysis Program.

Dr. Nolting stated that the group will need more time on this issue to consult with outside sources and the group agreed to revisit this part. Bridget Anderson asked if extraoral systems would be included in this part. Purrington said they would be included, along with cone beam CT. These units have a higher output than the intraoral units and MDH wants to minimize repeat exposures. Purrington stated that moving forward, MDH wants to ensure that ALARA principles are upheld and that individuals are not subjected to repeat exposures.

4732.0545. Utilization Log.

Dr. Johnson expressed concern that this only applies to nomads, panoramic, etc. She's concerned this might be burdensome for facilities having to write down all the patient data. Purrington stated that facilities can use the patient chart, including any electronic health record system, as the utilization log. Cavanagh stated that we can add language on how to comply with this rule part. One approach is to changing "utilization log" to "utilization requirements" to depart from the idea of a separate log that must be maintained. Anderson stated that the Board of Dentistry record rules require listing the diagnostic aids used so the data exist in the dental record and this information is already required.

4732.0550. Radiological Practice Standards.

Perez asked if Item A should be extraoral not intraoral. Perez also commented that the "minimum exposure required" in Item C does not work in dental imaging. Maybe change to the ALARA concept, and not minimum? Craig Verke (MDH) stated that subpart A should be intraoral, not extraoral, but if it is confusing it can be reworded. Dr. Nolting asked Perez if there are short cone units out there (Item E). Perez stated yes.

4732.0555. X-ray Film Processing Requirements.

Dr. Nolting asked what the "use of active voice with responsible agent" means in the comments. Cavanagh stated that it refers to a rule drafting best practice not write rules in the passive voice and to identify the responsible agent or actor using plain language.

4732.0560. Ordering of Diagnostic Radiographic or Therapeutic Procedures.

Anderson stated that Item E (licensed dental hygienist may order radiographs in facilities under a collaborative agreement) should be eliminated and not be required anymore because the Board of Dentistry requires a collaborative agreement with the doctors, and this would be covered under subpart 3 – Exception for dental facilities. Purrington asked if dental therapists can order x-rays. Anderson stated that this is not allowed in the board statute. Purrington stated she would like more information from Anderson. Purrington also asked Anderson a question regarding her wording for new Item C and "evidenced based guidelines". Anderson stated that this has to do with assessing the patient and ordering the radiographs based on the patient's risk and need. Anderson stated that she agrees this needs review, and will forward her thoughts to Purrington.

4732.0880. Intraoral Dental Radiographic Systems.

Purrington asked the group that as we review parts .0880, .0885, and .0090 to keep in mind that MDH is trying to make them consistent. Anderson asked Perez if he sees any D filming used in the field. Perez stated that some sites do, but mostly see E speed film. Purrington asked if it would suffice to follow FDA and ADA recommendations and remove D speed. The group agreed. Dr. Johnson asked subpart 2, item D – staff holding a sensor holder in place? MDH clarified that this was to prohibit staff from using bare fingers in the patient's mouth to hold the sensor. Perez stated that staff would have to have a lead glove or thyroid collar. Purrington stated we will review this language and suggested to (FGM) to submit comments that would make the rule part clearer.

4732.0885. Hand-held Dental Intraoral X-ray Systems.

Anderson and others asked about removing D speed to be consistent. Dr. Johnson asked about the variance portion of the rule part. Dr. Johnson asked about the need for a variance to the rule part. Purrington stated that a variance to this rule part [for dental hand-held equipment] would not be needed once the rules are adopted.

4732.0890. Extraoral Dental Systems.

Purrington asked for comments regarding safety controls. Dr. Johnson mentioned an editing error.

4732.0895. Dental Computed Tomography Systems.

Purrington stated this part contain a lot of new language and if it hasn't been reviewed by the focus group, then we can review at the next meeting. Anderson questioned subpart 3, item C in the comments regarding researching what the statute states regarding the imaging bill. Anderson asked if the manufacturer had no quality control recommendations, then would they need to hire a medical physicist. Purrington state that this is correct. Perez stated his concerns regarding CT testing and the number of exposures during testing and how the testing runs the risk of blowing the tube. Perez stated that he will put his suggestion in writing and send it to MDH. Anderson said she would like to review and send her comments as well. Dr. Nolting stated he will forward a recent Joint Commission Standards document along with this recommendations.

4732.1100. Installation Calibration Tests and Equipment Performance Tests for a Quality Assurance Program.

Focusing on subparts 11-13 only. Purrington stated that, in subpart 11, MDH is proposing to correct an incorrect citation. Perez recommended that the minimum performance criteria be changed to reflect digital images, not just film, and revise the rule language accordingly. Purrington stated that MDH intends to use the same terminology throughout the rule chapter to describe digital or film imaging. MDH is proposing to use "image" for both film and digital, and this is included in the proposed definitions revisions. Perez questioned Item F, and suggested amendments regarding non-evasive kvp and doing a voltage drop instead. Purrington asked Perez to submit additional comments on this topic.

Public Comments

Jacque Cavanagh, IER Section Policy and Rules Analyst

Asked for any public comments, and encouraged the public to work with group members regarding their concerns.

Public comment:

Shawn Wilson asked how MDH would like the feedback from the public. Cavanagh suggested using the request for comments online form to submit comments.

Public comment:

Linda Laman asked that 4732.0220 subpart 4 didn't imply that other types of intraoral equipment were exempt and in 4732.0360 subpart 5, include this as well. Dr. Nolting stated that adding the word "only" will clarify this.

Dr. Johnson comment:

Dr. Johnson asked if the focus group needs to restate the items talked about in this meeting in writing through the request for comments. Cavanagh stated that only if you have additional comments of items not talked about today, please include those in writing.

Adjournment

Teresa Purrington, X-ray Unit Supervisor

- Thanked everyone for their time and reminded them to submit their comments.

Jacque Cavanagh, IER Section Policy and Rules Analyst

- Stated that these updates will be completed and sent out before the next meeting.