

Memorandum

To: Shanah Black, Division of Health Service Regulation

From: Brent Townsend, MD, Wake Radiology UNG Health Rex, President and Managing Partner

Date: October 14, 2025

Re: Comments on Radiation Protection Rules 10A NCAC 15 .0601 - .0608, .0610-.0611

The proposed rule change, specifically Section .0604(2)(A) stating that fluoroscopy can only be performed by an advanced practitioner provider under the personal supervision of a physician would be a major change to the standard operating procedures at the hospitals we cover as well as our outpatient imaging facilities and would have significant negative effects on the care we can provide.

In current state, our experienced advanced practitioner providers (APPs) perform an array of basic procedures independently, but with indirect supervision of physicians (meaning physicians are immediately available for assistance as needed but not physically present within the room). These APPs are crucial for patient throughput and efficiency and are key for patient access in providing care in multiple locations. Their presence also allows physicians to perform more complex and higher-level procedures.

The proposed rule change would have the following impacts:

1. Delays in care for inpatients and outpatients
2. Increased length of stay for hospital inpatients
3. Decreased outpatient procedural availability
4. Increased cost of operations requiring more physicians for adequate coverage of procedural rooms

Thank you for taking this perspective into consideration.

Sincerely,

Brent A. Townsend

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