

As a Radiation Safety Officer for a large community hospital and several of its affiliates, I currently oversee a training program for physicians and Radiology APPs who operate fluoroscopy equipment during patient procedures. Accordingly, after reviewing proposed Rule .0604(i)(2)(A), I offer the following comments:

- The proposed rule incorrectly references Paragraph (l) for the subject matter that must be included in the fluoroscopy training program. The correct reference is Paragraph (m).
- The proposed rule permits APPs to operate fluoroscopy without completing any training related to the safe operation of such equipment. Because the operator activates the equipment to produce x-rays and controls its features to optimize image quality while minimizing radiation dose, it is imperative that APPs complete training.
- The proposed rule permits APPs to operate fluoroscopy equipment only if they are under personal supervision of a physician who has completed fluoroscopy training. This rule would require both a physician and an APP to be present during fluoroscopy procedures – and would create unnecessary staffing burden that could potentially impact negatively how the providers practice medicine at their facilities.
- By requiring both the APP and the supervising physician to complete fluoroscopy training, the rule encourages and facilitates their medical professional relationship – which is good for patient care.

I humbly offer the following amendment to Rule .0604(i)(2)(A):

*Individuals who operate fluoroscopy radiation machines shall be a physician as defined in Rule .103(b)(8) of this Chapter who has completed training in accordance with Paragraph (m) of this Rule or an advanced provider (APP) as defined in Rule .0602(2) of this Section who has completed training in accordance with Paragraph (m) of this Rule under the supervision of a physician who has completed training in accordance with Paragraph (m) of this Rule.*