



TO: COA Members
Orthopaedic Office Managers

FROM: Robert O'Hollaren, M.D., President

SUBJECT: **Important Fluoroscopy Alert
That Could Affect Your Ability to Utilize Fluoroscopy Equipment and/or
Supervise Radiology Techs**

The California Radiologic Technology Certification Committee (RTCC) has been investigating instances in California when the surgeon is using fluoroscopy and there is a need to move the patient and/or the fluoroscopy equipment during the procedure. The movement could be when the fluoroscopy equipment is or is not energized. The RTCC has had concerns that when movement does occur that the certified physician or Radiologic Technologist (RT) in the operating room reassess the spatial relationship before the fluoroscopy is resumed or during the course of the fluoroscopy to ensure continued patient safety.

Of particular concern to the RTCC and their investigators, has been when there is movement when the fluoroscopy equipment is energized. The RTCC certainly understands that there may be a very valid medical reason to move the patient or the equipment during the procedure. They also understand that there may be a need for a trained individual, such as a surgical nurse or orthopaedic tech who is not certified to operate the fluoroscopy equipment, to move the patient/equipment when the surgeon is otherwise busy and cannot move the patient/equipment themselves. This can certainly be the case during pediatric cases.

The problem is that the Radiologic Health Branch's (RHB) current regulations do not expressly allow this uncertified individual to move the patient/equipment when the fluoroscopy equipment is energized. Currently the RTCC is taking the position that there is not a violation if the fluoroscopy equipment is not energized.

The RTCC has formed a Subcommittee to address and clarify this issue. COA has two representatives on the RTCC and they are involved in the discussion.

To ensure that you and your facility are in compliance with the RHB regulations while the RTCC is clarifying this issue, if you are using individuals, who are not certified to operate the fluoroscopy equipment to move the patient/fluoroscopy equipment while the fluoroscopy equipment is energized, we would strongly urge your facility to request an exemption from the RHB.

In your request you are required to indicate:

1. The medical reason why the patient and/or fluoroscopy equipment needs to be moved under live fluoroscopy during the procedure.
2. Describe the qualifications of the individual who the surgeon is asking to do the movements.
3. If the individual has had radiation safety training, describe their training.
4. Describe precautions that are taken to protect him/her from excessive radiation exposure in the operating room.

5. Note that the individual is acting under the direct supervision of the surgeon who remains responsible for patient safety during the procedure.
6. Note if a Radiologic Technologist (RT) will be in the operating room for the procedure.
7. Indicate that the radiation dose to any individual in the operating room will not exceed the occupational radiation dose limits as a result of their exposure.
8. Certify that there is no significant hazard to life or property should the Department grant the exemption.
9. Certify that the radiation exposure to an individual in an uncontrolled area will not exceed .5 rem in a year.

The request for an exemption should be sent to:

Radiologic Health Branch
Gonzalo Perez, Branch Chief
1500 Capitol Ave., MS 7610
Sacramento, CA 95814

The RHB will evaluate each request on a case-by-case basis.

Call the COA office if you have questions regarding this alert – [916-454-9884](tel:916-454-9884).

California Orthopaedic Association

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