



Texas Radiation Advisory Board
P.O. Box 149347, Mail Code 2835
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John Hageman, M.S., C.H.P.
Chairman of the Texas Radiation Advisory Board

October 29, 2015

Mr. Kirk Cole,
Interim Commissioner
Texas Department of State Health Services
P.O. Box 149347
Austin, TX 78714-9347

Subject: Texas Radiation Advisory Board Position Statement on Training in the Safe Use of Fluoroscopic Imaging Technology in the Provision of Health Care

The Texas Radiation Advisory Board's (TRAB's or Board's) members are expert advisors and members of the public on issues relating to radiation and radioactive materials. The TRAB provides recommendations regarding radiation issues to the appropriate agencies, legislature and the Governor. As such, the TRAB is addressing the topic of:

The implementation and reinstatement of the regulations regarding radiation-safety training for physicians performing fluoroscopically-guided interventional procedures, as required by 25 Texas Administrative Code, Section 289.227(m)(9)(E).

The regulated community was informed of the indefinite delay of implementation of the training requirement by a DSHS Division for Regulatory Services notice, dated January 15, 2015.

Please see the attached TRAB Position Statement on this topic, which was unanimously approved by the Board's members. Members of the TRAB approved this position in part because of overwhelming feedback received from throughout the state concerning the efficacy of the required radiation safety awareness training. Patient doses received during fluoroscopically guided interventional procedures have decreased dramatically post-training – by as much as a factor of eight in some institutions. Physicians started to ask the technologists to set fluoroscopes in lower dose modes and have used those modes more often. Staff doses also showed a concomitant decrease when the patient is exposed to less radiation. In addition, although not required of them, many nurses and technologists around the state participated in the training as well, thus further improving radiation safety awareness and patient and staff dose

reduction throughout the state. Finally, while some physicians were less than eager to have to undergo the once-in-a-career training they invariably expressed appreciation for the instruction and personally expressed that they learned a lot about how to reduce dose to their patients and other staff in the room.

Put simply – the requirement [Section 289.227(m)(9)(E)] worked to place patients in the State of Texas in a more safe radiation environment.

Please contact me if you have any questions regarding the TRAB's Position Statement.

Respectfully Submitted,



John Hageman, M.S., C.H.P.

Chairman of the Texas Radiation Advisory Board

cc: Richard Ratliff, Darlene Metter

Attachment 1

Position Statement on the Safe Use of Fluoroscopic Imaging Technology in the Provision of Health Care



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**Texas Radiation Advisory Board Position Statement on
The Safe Use of Fluoroscopic Imaging Technology
in the Provision of Health Care**

The use of x-ray imaging technology in the United States now accounts for approximately one-half of the radiation dose received by members of the general public. A significant contribution to this healthcare-related dose comes from fluoroscopy. Fluoroscopy is the use of X-rays to obtain real-time images of internal body structures, thereby aiding healthcare professionals in patient care. As with other procedures, adverse and harmful effects may arise from elevated radiation doses to the patient and medical personnel (e.g., radiation burns, skin damage and early onset of cataracts). Therefore, the Texas Radiation Advisory Board strongly endorses a minimum of eight (8) hours of didactic training in radiation safety in addition to one hour of practical training in the appropriate use of fluoroscopic equipment. This training is to assure that healthcare providers are adequately trained in maximizing radiation safety in patient care while minimizing unnecessary radiation exposures and associated risks.

Therefore, the Texas Radiation Advisory Board strongly recommends the implementation and reinstatement of the regulations regarding radiation safety awareness training for physicians performing fluoroscopically-guided interventional procedures, as required by 25 Texas Administrative Code, Section 289.227(m)(9)(E).

The Texas Radiation Advisory Board looks forward to the Agency's consideration of this Position Statement and to the Agency's written response to the recommendation, as required by Section 401.020 of the Texas Health and Safety Code.