

X-ray Advisory Committee Meeting

MEETING MINUTES

Date: July 26, 2017

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

Attendees: Beth Schueler (Medical Physicist), Brian Hall (Service Provider), Dan Lind (Service Provider), Frank Zink (Medical Physicist), Julie Sabo (MN Nursing Board), Michael Lewandowski (Health Physicist/CHP), John Wohlhuter (MN Association of Nurse Anesthetists), Ronnell Hanson (MN Radiological Society), Tony Murphy (Medical Physicist), Vinton Albers (Chiropractic Association).

Guests: Deanna Duke (Nomad market Development Manager), Scott Hadden (Nomad Product Manager).

Absent: Bridgett Anderson (MN Dental Board), Louis Saeger (MN Medical Association), Richard Giese (Medical Physicist/PhD), William Duppler (Medical Physicist).

MDH: Craig Verke, Jacquie Cavanagh, John Olson, Kelly Medellin, Mary Navara, Michelle Ambrose, Patricia Winget, Teresa Purrington.

Welcome and Introductions

Mary Navara, Indoor Environments and Radiation Manager

Mary welcomed everyone.

Teresa Purrington, X-ray Program Supervisor

Introduced representatives from Nomad present at the meeting: Deanna Duke and Scott Hadden. Also stated that there will be time for comments from members of the public at the end of the discussion.

Rule Revision

Jacquie Cavanagh, Section Policy and Rules Analyst

Teresa Purrington, X-ray Unit Supervisor

Cavanagh went through the MDH Request for Comments document and discussed MDH's rule making authority.

- Purrington discussed the state of Michigan's rules and showed their website to the committee. She stated that MDH is planning to adopt Michigan's organizational framework. The dental provisions under review today are based on this format.

- Cavanagh explained that MDH intends to repeal most of the existing language in Chapter 4732 and replace it with new provisions. This will help with the review process since all the proposed language will be underscored and there will be no more strike-outs and amendments to the individual rule parts.

Dental Rule Review

*Jacquie Cavanagh, Section Policy and Rules Analyst
Teresa Purrington, X-ray Unit Supervisor*

Intraoral Dental X-ray Systems Revision

Cavanagh went through Intraoral Dental X-ray Systems Revision document. She stated that the defined terms are highlighted in blue for review purposes. She also noted that certain technical provisions may be applicable to a service provider and asked for input on this.

Subp. 1. Applicability.

Frank Zink (Advisory Committee Member, ACM) questioned the need for referencing 21 CFR and manufacturer specification. Purrington responded that MDH is also considering the utility of this language and acknowledged that this may change.

Subp. 2. Beam quality.

Beth Schueler (ACM) stated the wording "Specified" in the half-value table is confusing. A footnote might be needed to clarify this language.

Subp. 3. X-ray beam alignment.

Schueler questioned why 50 kVp was removed. Purrington stated this was discussed during the dental focus group discussions. The focus group agreed that dental x-ray equipment operating at or below 50 kVp were no longer being used in the state.

Subp. 7, item B. Technique factors.

Zink questioned the provision for automatic exposure control. Tony Murphy (ACM) agreed with Zink. Purrington stated this is language from Suggested State Regulations for Control of Radiation (SSRCR) and could be moved to general x-ray equipment rather than dental. Scott Hadden (Nomad) stated there is emerging technology that could include that. Purrington stated this isn't clear and could be researched. Advisory committee agreed to leave it in if emerging technology might be in the future.

Subp. 8. Calibrations.

Zink suggested changing calibration heading to say equipment performance evaluations. Michael Lewandowski (ACM) stated he disagrees with proposed wording for interval of calibration frequency. Lewandowski would prefer the provision to include "not to exceed 24 months" rather than including a grace period before a violation. Purrington responded that MDH wants to clarify that there is a separate, 30-day grace period. Lewandowski stated that MDH should state 730 calendar days, and remove the 24 months. Murphy stated he likes the 24

month provision because that is how the regulated community refers to it now. Julie Sabo (ACM) stated that a grace period could continually push out the calibration requirement by one month. MDH will continue to research the best practice for comparable grace periods.

Subp. 8, item E, 4. Calibration Performance Criteria.

Schueler stated she's not sure that the 1973 language needs to be included. Murphy suggested amending kVp accuracy to read +/-5% or manufacturers specifications

Subp. 8, item E, 5. Calibration Performance Criteria.

Murphy stated the committee should look at the linearity language, specifically Dental mA linearity and changed to output. Cavanagh stated this was taken from our existing rule language, but we are open to updating this provision.

Subp. 9. Shielding requirements.

Purrington stated that MDH would like to keep the 6 foot distance requirement for shielding because, historically, the rule has been 6 feet, and not 6.5 feet as suggested by SSRCC. Zink agreed that this should be consistent with what we have required of registrants in the past, including provisions for protective barriers.

Subp. 10. Shielding exemption.

Zink questioned if this exemption has that always been in place? Purrington confirmed that it has.

Subp. 13. Utilization Data.

Zink questioned this provision since dental is exempt currently. Purrington responded that MDH added this for discussion purposes. Purrington responded that MDH will continue to research what other states require for utilization data.

Subp. 14. Operator protection.

Murphy suggested adding individuals who must remain in the room could also stand 6 feet away.

Subp. 15. Film processing.

Schueler questioned if film provisions are needed. Cavanagh responded that the Dental Focus Group discussed this and agreed it should be included since some registrants still use film.

Subp. 18. Safety controls.

Craig Verke (MDH) stated this should be changed to Subpart 16. Dan Lind (ACM) stated that the rule should be consistent in expressing measurements (ie – “English” measurement first and “metric” in parentheses).

Hand-held Dental X-ray Systems Revision

Cavanagh went through the Hand-held Dental X-ray Systems Revision document and stated the comments from the intraoral document will also be looked at with this revision. Purrington

stated this document is very similar to the intraoral document. MDH will review all the consistent provisions at the end of the process and combine.

Subp. 8, item E, 3. Calibrations.

Lind questioned the need for kVp accuracy prior to 1973 for hand-held equipment. Purrington agreed it was not necessary and will be removed as it is only needed for intraoral equipment.

Subp. 12. Ordering of diagnostic radiographic examinations.

John Wohlhuter (ACM) asked MDH when this topic will be determined. He also stated MDH should consider scope of practice. Cavanagh responded there is no set schedule. MDH continues to gather information and is keeping track of the discussions on the issue of ordering and scope of practice. Zink stated he prefers that ordering/scope of practice provisions be removed completely. Ronnell Hanson (ACM) stated that MDH should focus on qualifications and training and not scope of practice.

Subp. 14. Operator protection.

Lewandowski stated that item B doesn't seem to apply with hand-held. Schueler questioned if item C should be with hand-held. Purrington responded that this should be included for hand-held since there may be other manufacturers other than Nomad to consider. Lewandowski stated that MDH might want to consider working with manufacturers to provide documentation measuring attenuation for that specific piece to exempt hand-held from this part. Hanson stated because they're mobile, they could be dropped or deemed ineffective, and that the lead barrier could be necessary. Cavanagh responded that MDH will take this advice and this discussion will be continued at the next meeting.

Public Comments

Teresa Purrington, X-ray Unit Supervisor

Purrington asked for any public comments.

- Kayla Ford: What does a qualified operator look like? MDH needs to define better who can order. Cavanagh responded this is a little outside of today's meeting, and part of the larger discussion for the committee to continue. She also had a question with the CVT variance. Cavanagh stated that MDH will answer her questions after the meeting.
- Linda Laman: Under hand-held calibrations, item A. Does this have to be done on-site? Consider changing the intervals for calibrations to 12 months? Lewandowski stated the term installation should be looked at for hand-held devices, as they aren't calibrated on-site.

Minnesota Department of Health
PO Box 64975
St. Paul, MN 55164-0975
651-201-4545
health.xray@state.mn.us
www.health.state.mn.us/xray

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