

Information Notice Regarding New Fluoroscopic Equipment Use Policy

Background

In August 2015, the California Department of Public Health – Radiologic Health Branch (CDPH-RHB) conducted an inspection of the UCSD Health System as it relates to radiation safety and compliance with the California Code of Regulations and California Health and Safety Code. During their visit, State inspectors focused much of their attention on the use of fluoroscopic equipment, including operator certificates and permits, and appropriate supervision. During and subsequent to this inspection, the CDPH-RHB strengthened their position on what was previously an ambiguous definition of physician supervision of fluoroscopic procedures. Consequently, this inspection marked the first time in which a UC San Diego Health System physician received a Notice of Violation – Radiation Users Declaration (NOVRUD). A NOVRUD is a violation issued to an individual (separate from a facility violation) and requires both a signed declaration and written response from that individual.

New Fluoroscopic Equipment Use Policy

In response to the CDPH-RHB inspection, the UC San Diego Health System has adopted a new fluoroscopic equipment use policy, effective immediately. A copy of the full policy is attached for reference, and may be viewed online [here](#). Included in the policy are both new and existing requirements. They are:

- Physicians who operate fluoroscopic equipment, directly control radiation exposure to a patient during a fluoroscopic procedure, supervise the use of fluoroscopic equipment by a certified radiologic technologist with fluoroscopy endorsement (CRT-F), or supervise the use of fluoroscopic equipment by a resident or fellow under an approved medical training program, must possess a current and valid Radiology Supervisor and Operator certificate or Fluoroscopy Supervisor and Operator permit (both referred to as SupOp).
- Unless performing a standard fluoroscopic protocol (e.g. barium swallow) for which there is a documented procedure available, a CRT-F operating fluoroscopic equipment must be directly supervised by a valid SupOp for the length of the fluoroscopic procedure. Direct supervision is defined as being within the same procedure room, with a line of sight and within the sound of a normal speaking voice.
- Physicians with a valid SupOp must supervise residents and fellows without a valid SupOp who operate fluoroscopic equipment under an approved medical training program. The level of supervision required (e.g. direct, indirect, oversight) must be defined under the medical training program. Absent a written description of the required level of supervision, and absent documentation supporting an individual's competency to perform a specific procedure, direct supervision (i.e. physical presence in the same procedure room) is required.
- Residents and fellows without a valid SupOp may not supervise the use of fluoroscopic equipment by a CRT-F.

If not already certified or permitted, residents and fellows who will use, or supervise the use of, fluoroscopic equipment are strongly encouraged to apply for and obtain a Radiology Supervisor and Operator certificate or a Fluoroscopy Supervisor and Operator permit as soon as possible.

Please refer to the links below for Supervisor and Operator certificate or permit applications and fluoroscopy exam preparation information:

Radiology Supervisor and Operator Certificate Application (for Radiologists and Radiation Oncologists only)

<https://www.cdph.ca.gov/pubsforms/forms/CtrlForms/cdph8231.pdf>

Fluoroscopy Supervisor and Operator Permit Application

<https://www.cdph.ca.gov/pubsforms/forms/CtrlForms/cdph8230.pdf>

Fluoroscopy Exam Preparation Information (for Fluoroscopy Supervisor and Operator permits only)

<https://www.cdph.ca.gov/certlic/radquip/Documents/RHB-IN-FluoroExamNotice-2014-01-30.pdf>