

RADIOLOGIC SAFETY

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The Joint Commission Sentinel Event Alert - Issue 47, 2019 Revision

The Joint Commission (TJC) Sentinel Event Alert #47 was first released in August 2011. The subject of the alert is “Radiation risks of diagnostic imaging.” The initial release of the alert did not cover therapeutic radiation or fluoroscopy. TJC stated “While fluoroscopy is used diagnostically, there are special issues associated with its use that make it inappropriate to be included here.” It became appropriate toward the end of 2018 and the alert received a new revision date and title “Radiation risks of diagnostic imaging and fluoroscopy”.

The purpose of a Sentinel Event Alert is to identify specific types of sentinel events, describe the underlying causes and suggest ways to prevent occurrences in the future. The impetus for Alert 47 was the large increase in the U.S. population’s total exposure to ionizing radiation from medical imaging. The alert addresses contributing factors to eliminate avoidable radiation exposure. In the alert TJC also suggests actions for reducing risks due to avoidable ionizing radiation. The actions suggested and illustrated in the alert are related to the following:

- Right test
- Right dose
- Effective processes
- Safe technology
- Safety culture

As a result of and in conjunction with the alert TJC has incorporated additional requirements specific to fluoroscopy. The new requirements became effective January 1, 2019. Beginning January 1, 2020 hospitals can be “scored” if they are not meeting the updated standards. Being scored is not a good thing! The standards that The Joint Commission revised include:

- EC – Environment of Care Chapter
- HR – Human Resources
- LD – Leadership
- PC – Provision of Care, Treatment and Services
- PI – Performance Improvement

Per the June 25, 2018 TJC Prepublication Requirements, the following elements of performance (EP) within the standards include additional fluoroscopy specific requirements. Note the following EPs are not stated in their entirety.

EC.02.04.03 EP 34: At least annually, a diagnostic medical physicist conducts a performance evaluation of fluoroscopic imaging equipment. (TJC defines annually at +/- 30 days, with emphasis on the +30)

*HR.01.05.03 EP 15: The hospital verifies and documents that individuals (including physicians, non-physicians, and ancillary personnel) who use fluoroscopic equipment participate in ongoing education that includes annual training.

LD.04.01.05 EP 25: The hospital designates an individual to serve as the **radiation safety officer who is responsible for making certain that radiologic services are provided in accordance with law, regulation, and organizational policy.

PC.01.02.15 EP 13: The cumulative-air kerma or kerma area product are documented in a retrievable format. Time and number of images acquired can be used if the K or KAP aren't displayed.

PC.02.01.01 EP 30: The hospital identifies radiation exposure and skin dose threshold levels, that if exceeded, trigger further review and/or patient evaluation to assess for adverse radiation effects.

PI.02.01.01 EP 20: The hospital reviews and analyzes instances where the radiation exposure and skin dose threshold levels identified by the organization are exceeded.

* HR.01.05.03 EP 15 has since been removed from the requirements. The Joint Commission determined the requirement was redundant to other accreditation requirements. However, according to Andrea Brown at TJC the surveyors are being educated to make sure that users of fluoroscopy have the requisite training. Among other standards Andrea referenced HR.01.05.03 – Staff participate in ongoing education and training and HR.01.06.01 – Staff are competent to perform their responsibilities. In other words, the new EP didn't really go away and in fact has always been present. The surveyors will be ensuring that users of fluoroscopic equipment can exhibit and provide evidence of competency.

**The organization designates the r.s.o. This individual may or may not be the same as the R.S.O. who is approved by the NRC or agreement states and is responsible for the licensed radioactive material.