Fluoroscopy Credentialing Process for Physicians and Advanced Practice Professionals

Purpose:
To describe the process by which physicians and advanced practice professionals are credentialed to perform high and low risk fluoroscopic procedures. This process applies to providers who are members of the medical staff of all SH Lycoming hospital campuses. Credentialing to perform fluoroscopic procedures will depend on the physician or advanced practice professional providing documentation that they have completed education in fluoroscopic radiation safety. The ultimate purpose of this process is to minimize radiation exposure to patients and staff.

Policy:
All physicians and advanced practice professionals who operate or direct fluoroscopic equipment must provide documentation that they have completed fluoroscopic radiation education at the time of their appointment and reappointment to the medical staff.

Reference documents:
- 25 PA Code § 221.11
- PA DEP guidance document 291-4200-001 Medical X-ray Procedures Operator Training Guide including Appendix A
- PA DEP BRP X-Ray Operator Training Guide Supplement_Rev4

Procedure:
1) **Scope**: All physicians and advanced practice professionals who operate or direct fluoroscopy equipment at any SH Lycoming hospital campus must complete fluoroscopic radiation safety education in order to be credentialed by the medical staff. Operation of fluoroscopy equipment means actual hands on control of the unit or directing hands on control of the unit e.g. initiating x-ray exposure, operating any of the system controls, verbal control of fluoroscopy unit, etc.

2) **The operation of fluoroscopy equipment by advanced practice professionals**: This section is reserved until such time a decision is made by the medical staff regarding whether procedures done by APPs must be performed under the direct supervision of a physician.

3) **Exclusions**: Personnel who operate accelerators are excluded.

4) **Inclusions**: Physicians who perform fluoroscopic procedures include radiologists, cardiologists, gastroenterologists, pulmonologists, urologists, neurosurgeons, orthopedic surgeons, vascular surgeons, anesthesiologists, general surgeons, breast surgeons, plastic surgeons, podiatrists, and pain management specialists.
5) **Initial credentialing for high risk procedures**: Any fluoroscopic procedure that could exceed skin doses of 200 rads (2Gy) is designated as a high risk procedure. High risk procedures include, but are not limited to, the following:

- **Radiofrequency cardiac catheter ablation**
- **Percutaneous angiography and percutaneous transluminal angioplasty (coronary and other vessel)**
- **Vascular embolization**
- **Stent and Filter placement**
- **Thrombolytic and fibrinolytic procedures**
- **Percutaneous transhepatic cholangiography**
- **Endoscopic retrograde cholangiopancreatography**
- **Transjugular intrahepatic portosystemic shunt**
- **Percutaneous nephrostomy, biliary change or urinary/biliary removal**
- **Complex multilevel vertebral augmentation procedures**
- **Any lengthy or particularly difficult C-arm procedure with total fluoroscopy time exceeding 5 minutes**

Physicians, who are board certified by the American Board of Radiology, the American Osteopathic Board of Radiology, or the American Board of Internal Medicine with subspecialty certification in Cardiology, are qualified for initial credentialing for high risk fluoroscopic procedures by virtue of their certification. Physicians and advanced practice professionals not so qualified may be credentialed after providing documentation that they have completed a fluoroscopic radiation safety education activity for high risk procedures that has been approved by the Susquehanna Health Radiation Safety Committee. In lieu of that, they must provide documentation of fluoroscopic radiation safety education that satisfies the criteria described in section 8 of this document and is approved by Susquehanna Health’s Radiation Safety Officer.

6) **Initial credentialing for low risk procedures**: Any fluoroscopic procedure that does not exceed skin doses of 200 rads (2Gy) is designated as a low risk procedure. Physicians, who are board certified by the American Board of Radiology, the American Osteopathic Board of Radiology, or the American Board of Internal Medicine with subspecialty certification in Cardiology, are qualified for initial credentialing for low risk fluoroscopic procedures by
virtue of their certification. Physicians and advanced practice professionals not so qualified may be credentialed after providing documentation that they have completed a fluoroscopic radiation safety education activity for low risk procedures that has been approved by the Susquehanna Health Radiation Safety Committee. In lieu of that, they must provide documentation of fluoroscopic radiation safety education that satisfies the criteria described in section 8 of this document and is approved by Susquehanna Health’s Radiation Safety Officer.

7) **Continuation of fluoroscopy privileges prior to reappointment to the medical staff**: At the time of their medical staff reappointment, physicians who are re-certified by the American Board of Radiology, the American Osteopathic Board of Radiology are qualified for re-credentialing for both high and low risk fluoroscopic procedures by virtue of their certification. All other physicians and advanced practice professionals who perform fluoroscopic procedures must provide documentation of having completed continuing fluoroscopic radiation safety education during their current 2 year appointment cycle. This requirement can be satisfied by completing a fluoroscopic radiation safety education activity that has been approved by the Susquehanna Health Radiation Safety Committee. Those providers who do high risk procedures must complete an activity designed for high risk procedures. Those providers who do low risk procedures must complete an activity designed for low risk procedures. In lieu of that, providers must provide documentation of alternate fluoroscopic radiation safety education that satisfies the criteria described in section 8 of this document and is approved by Susquehanna Health’s Radiation Safety Officer.

8) **Educational requirements**: The educational requirements for both initial and continuing credentialing of both high and low risk fluoroscopic procedures can be satisfied by completing a fluoroscopic radiation safety education activity that has been reviewed and approved by the Susquehanna Health Radiation Safety Committee. Documentation of alternate fluoroscopic radiation safety education activities will be considered on a case-by-case basis. In situations that require expedited approval, documentation of alternate fluoroscopic radiation safety education activities will be reviewed by the Susquehanna Health Radiation Safety Officer. Approval will be based on the following criteria:

a) The educational content and hours are comparable with current, applicable regulations and guidelines as promulgated by the PA Department of Environmental Protection - Bureau of Radiation Protection. See the reference documents cited above.

b) The education was received within 2 years prior to the request for privileges.
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Documentation of alternate fluoroscopic radiation safety education activities must clearly indicate:

a) Physician or advanced practice professional’s name
b) Name of the organization providing the education
c) Title of activity
d) Educational objectives and/or content that are related to fluoroscopic radiation safety
e) Educational format
f) Date that activity was completed
g) Number of hours of instruction

9) **Responsibility**: This section is reserved pending further explication of the respective roles of the Medical Staff Credentials Committee, the Susquehanna Health Radiation Safety Committee, and the Medical Staff office with regard to the implementation, administration, and recordkeeping related to this policy.

10) **End note**: This document supersedes and replaces the previous policy entitled: *Fluoroscopy credentialing criteria for Physicians and Licensed Practitioners at Susquehanna Health* approved by the MEC on 8/23/12.

Approved by Credentials Committee March 2016
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