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Docket: NRC-2020-0141 Reporting Nuclear Medicine Injection Extravasations as Medical Events

Comment On: NRC-2020-0141-0004 Reporting Nuclear Medicine Injection Extravasations as Medical Events; Notification of Docketing and Request for Comment

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Submitter Information

Name: James Crowley Address: 5825 CASTLE ROCK RD ROANOKE, VA, 24018 Email: jrcrowley@carilionclinic.org Organization: Carilion Clinic

General Comment

As a leader in my hospital i have been exposed to the question of radioactive injections and their integrity. Initially, i was very skeptical that it mattered because no one ever questioned this in the past. My training did not include anything related to how much material went in or how i would manage the situation if i injected the patient wrong. As i learned more we started to question this further and led to over 4000 patients reviewed for injection integrity. I was amazed at how much we could learn and improve by starting to review, document, and track infiltration. Our first QAQI study was able to lower rates from 13% to under 3% and keep consistent for multiple years. As we continue to onboard and track injections we would get a bump higher (more infiltration) and with techniques and education we would lower.

As our offerings improved we learned the important nature of the process because our

information has the ability to be quantitative and less qualitative. With a new CPT code for quantification approved this year our processes continue to focus on high quality and low rates of infiltration AND awareness of when it occurs.

As our therapuetic offerings grow our concern over infiltration continue to be very important with significant health effects to individuals.

I encourage the requirement of disclosing and reporting infiltration with help to provide tools to create appropriate "speed limits" when the dose really matters and do the work to understand the importance and potential health effects of dose infiltration.

We can reduce them. They do impact quantification. We should be required to improve them in the same way we are required to wash our hands and inject the correct isotopes.