



American Association for Nuclear Cardiology, Inc.

Professionals Dedicated to Diagnostic Accuracy

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FedEx

Mr. Charles Miller, Director
Division of Industrial & Medical Nuclear Safety
US Nuclear Regulatory Commission
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Mr. Miller;

Please advise me on the position of your agency on the following issues:

1. May a physician, listed on the facility license as an authorized user, order, prescribe, a diagnostic radiopharmaceutical for a patient who:
 - a. Has not been seen and who's case history is unknown to the authorized user and the authorized user's ability to prescribe is simply used by non physicians through "standing orders"?

Example: A commercial facility performs diagnostic nuclear medicine procedures. A person, physician or non physician (i.e. social worker or therapist) refers a patient to the commercial facility. Upon receipt of the request for the procedure, a non physician at the facility orders the radiopharmaceutical (s) required for the procedure from the Radiopharmacy using "standing orders" simply state that for procedure X agent Y of activity Z will be provided. The authorized user does not see the patient prior to administration of the agent and thus does not review the history, indications, contra indications or contra considerations for the procedure.

2.
 - a. Does a physician have to be present or physically available within a reasonable period of time, say less than an hour, when the patient is administered the radiopharmaceutical(s) and imaged?
 - b. Does the "physician" have to be the authorized user?
 - c. If the authorized user does not have to be present, but another physician is present, what training does that physician have to complete?

3.

- a. Does the authorized user have to interpret the test results?
- b. May a physician, who is not the authorized user, do the sole interpretation of the results?
- c. Does the interpreter of the test results have to be a physician or may a non physician perform the sole interpretation?
- d. May test results be interpreted by a physician who is not licensed to practice medicine in your state?

Your prompt response will be greatly appreciated

Sincerely,



Charles H. Rose, MA, MSPH, D(ABSNM)
Executive Director