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Submitter Information

Name: Anonymous Anonymous
Address:
Queen's Medical Center
1301 Punchbowl St.
Honolulu, HI, 96813
Email: mcoel@queens.org

General Comment

It would be a disservice to patients to allow less experienced physicians to prescribe and administer radiopharmaceuticals. The dilution of cases reduces the experience any one individual has with the radiation safety, leaving the technologists responsible for safety and complications of both diagnostic and therapeutic procedures. The physicians who have a case here and a case there will not have experienced the problems of patients for venous access, side effects, proper preparation, and departmental adherence to NRC and JAHCO regulations. As therapies are developed, it takes physician interaction with the nuclear medicine technologist and clerical staff , the nursing staff, and administration to properly run an effective and safe program. Some must have "skin in the game," rather than just a cursory, intermittent patient for care. Lastly, when a clinician has a procedure that can order on his own patients, there has been documented over-utilization, as seen with nuclear cardiology when the cardiologists began owning the equipment. For patient safety and appropriate utilization, neutral party administration of nuclear medicine exams and treatments is the appropriate path. Thank you very much.