

# PUBLIC SUBMISSION

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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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## General Comment

Its hard to believe something as detrimental to a patient as a failed injection of radioactive material is not reported to the patient or patients physician. These failures can result in diagnosis errors, treatment errors, and even potentially lost lives. If a technician were to spill a radioactive medication on a patient it would be reported, but if its spilled inside a patient through an extravasation its not reported. A few preventable serious injuries or lost lives a year should be enough to move the NRC to immediate action.

Im not from the medical field, but rather have spent my life in financial services and business operations. In business we know what gets measured gets managed. And amazingly, when we start measuring we learn some things. We learn what the incidence is, and we learn how to improve. We identify problems and fix them. Im amazed there is a debate over whether we should be attempting to improve patient care and patient outcomes! I amazed people of

science could inject non-science into the debate. Tracking and reporting is just common sense in any business, and process, and any medical procedure!

Technology has improved a bit in the past 40 years since the decision was made to ignore this issue. It's time to leverage technology to improve a simple procedure. Extravasations do happen. An anesthesiologist I was speaking with tells me he sees them in the operating room virtually every day. Studies are now available to tell us this happens with nuclear medicines too. And if we start monitoring and reporting extravasations will still happen. The difference is we will begin to improve. We will learn some clinics are better than others. We will learn there are training issues. We will learn best practices. Perhaps someday we may even become so good there is no longer a need to report, but we are not there today! If we dont measure do we just pretend there is not issue? The science shows theres an issue. Physicians are well aware this is an issue. How can anyone who cares about patients just turn a blind eye to this? Would you want to know if it was your spouse? Would you if it was your child? You would, so this is your chance to make a difference in someones life. Use science to start improving outcomes!

Clinics and physicians may not want to report their failures. I dont like admitting something I did turned out wrong. And I dont want to spend time having to report it to others. But if I just ignore it, it doesnt go away. It usually gets worse. In my business we had a saying, A dead fish does not smell better with time. Dont hide the problem. Dont try and sweep it under the rug. Deal with it! Im sure in the world of nuclear medicine we are doing far more injections than we did 40 years ago, and Im sure the incidences of problems is far greater than it was 40 years ago. The problem is not going away, its growing. The dead fish smells worse, and its in your back yard! You can fix the problem and change the trend. Start the process of improvement by measuring the problem. We can do better.