



HEALTH PHYSICS SOCIETY

Specialists in Radiation Safety

October 14, 2020

Andrea D. Browne, Ph.D., DABR

Diagnostic Medical Physicist

SIG Engineer Team

The Joint Commission

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Eric Goldin

President

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Subject: Collaborative Efforts with the Health Physics Society

Dear Dr. Browne:

As President of the Health Physics Society (HPS), I write to provide some thoughts on how the Health Physics Society could collaborate with The Joint Commission (TJC) to radiation safety.

The Health Physics Society (HPS), formed in 1956, is a scientific organization of professionals who specialize in radiation safety. The HPS membership consists of experts in a broad spectrum of theoretical and applied radiation safety subspecialties, including ionizing and non-ionizing radiation protection, radiation biology, regulations and applied radiation safety in a wide range of fields, including the medical field. The society includes a robust and active Medical Health Physics section, with members employed by a variety of leading health care organizations, where they provide critical technical expertise to ensure the safety of patients and medical staff. HPS also maintains strong public-facing radiation safety education and risk communication through the [Ask the Experts](#) feature of HPS.org, as well as various publications and information sheets produced by panels of HPS technical experts. HPS members are also well established in national and international radiation safety groups, including prominent members of the International Commission on Radiation Protection (ICRP), National Council on Radiation Protection and Measurement (NCRP), American National Standards Institute and advisory committees to the Environmental Protection Agency and Nuclear Regulatory Commission.

The HPS prides itself as an independent scientific organization whose mission is excellence in the science and practice of radiation safety. As professionals, health physicists / medical health

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physicists approach the physics and radiation safety needs of the medical community through understanding, evaluating, and controlling potential radiation risks relative to its benefits with a breadth of experience that spans the entire radiation safety industry.

The Society believes that both HPS and The Joint Commission would benefit from a closer collaborative relationship. We believe that the breadth of expertise and practical experience of HPS members could positively contribute to the mission of the Joint Commission. In the recent past, the HPS commented on Joint Commission standards, though we do not believe the Society has been involved more directly in the standards development process. We offer that Health Physics Society could assist The Joint Commission in the development, modification, and assessment of standards that touch upon the safety or use of ionizing and non-ionizing radiations. Such sources include not only traditional x-ray sources for diagnostic radiology, but also therapy based sources for radiation oncology, radiofrequency hazards, ultraviolet radiation sources, lasers, and any applications involving radioactive materials in the health care setting.

I offer three specific opportunities where the Health Physics Society could work with The Joint Commission:

1. UV Safety: With the increased use of UV radiation to disinfect rooms, equipment and PPE effective safety standards should be in place to protect those involved. A TJC standard already exists under Environment of Care for hazardous energy (EC.02.02.01). HPS could assist with the application of OSHA's UV radiation safety standards and technical literature from the International Commission on Non-Ionizing Radiation Protection (ICNIRP).
2. Laser Safety: Lasers that emit injurious radiation are ubiquitous in modern medicine with applications in surgery, ophthalmology, physical therapy, dentistry, and even ancillary equipment. As the medical applications for lasers continue to grow there needs to be a strong program that establishes risk based evaluation criteria that focuses on Class 3B and Class 4 lasers and provisions for inspecting safety compliance.
3. Radiation Protective Apparel: Wearing protective apparel when working with radiation is one component of a radiation safety program. With an increase in the number of interventional programs, there is a need to evaluate the effectiveness of the RPA program and the implementation of good radiation hygiene practices in the hospital organization. This could be done through a program that reviews RPA availability and use, clinician training, and radiation exposure monitoring program efficacy. While historically the focus has been on close inspection of the lead apparel inventory and testing program, this adjusted focus would, we feel, provide more benefit in terms of programmatic evaluation and understanding the safety posture of the organization.

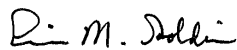
In addition, the HPS offers our assistance for technical consultation with respect to any radiation safety issues that may arise. To foster a stronger relationship between our two organizations,

HPS would also like to establish collaborative meetings at a frequency to be mutually determined. The goal of these meetings would be to share or discuss emerging radiation safety issues in the health care arena. This collaborative arrangement will provide The Joint Commission with the regular operational insights from front-line medical health physicists, as well as an additional conduit to provide timely guidance and insight to this targeted audience. Further, HPS membership will gain insights from The Joint Commission on application of new, proposed or existing standards and expectations.

We respectfully await your response on the best way to move forward with this request to our mutual benefit.

If you have any questions regarding these comments, please contact the HPS Congressional Liaison, David Connolly JD, at 202-557-1728 or by email to davidaconnollyjr@gmail.com.

Sincerely,

A handwritten signature in black ink that reads "Eric M. Goldin". The signature is written in a cursive style.

Eric Goldin, PhD, CHP

President

cc: Craig Little, PhD, HPS Agency Liaison

Brett Burk, HPS Executive Director