

Regulatory framework and inspections in Switzerland

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Regulatory body-FOPH

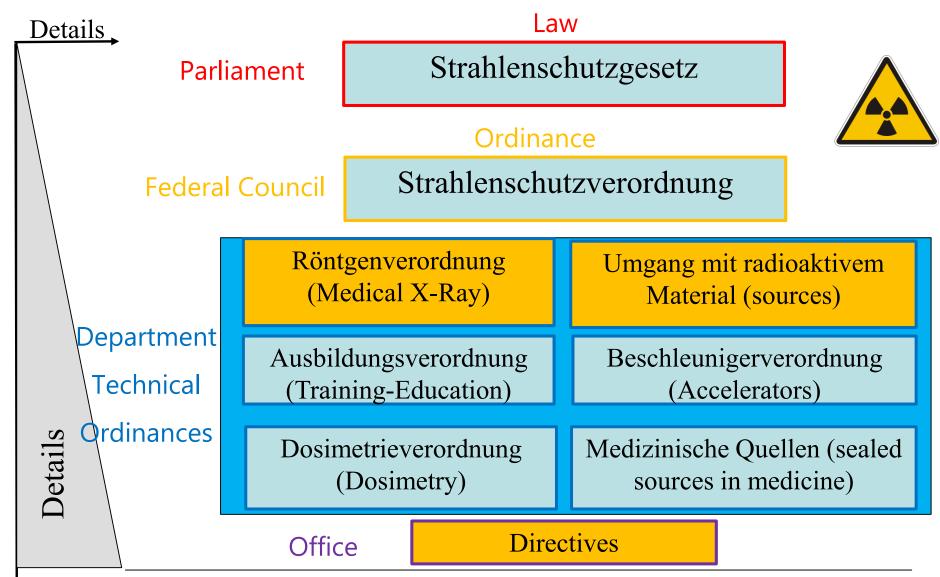
Duties of the Federal Office of Public Health

- Licensing the use of ionizing radiation (commerce, transport, use)
- Surveillance in
 - Medicine (Patient, Staff)
 - Research (Public, Staff)
 - Education (Public)
 - Environment (Public)

Advantages

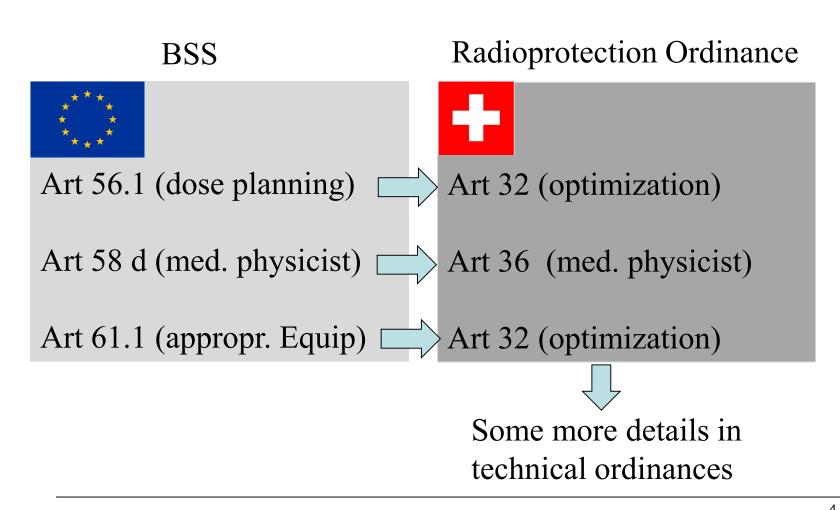
- FOPH oversees the whole process
 - Source from cradle to grave
- Patients
- Workers
- Public
- Environment

C Legal basis: relevant legislation for medical applications



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Transposition of BSS





Focus of inspections

Patients

- NRD (nuclide, CT)
- Therapy doses
- QA equipment
 - Activimeter
 - CT
 - Gamma Cam
- QA radiopharmaceuticals

Environment

- Immission limits
 - Water and air
- Waste management

Occupational

- Training
- Dose H_{0.07}, H₁₀
- Work place
- Shielding

Public

- Direct exposition in vicinity
- Waste management
- Release criteria of patients

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Key inspections 2010-18

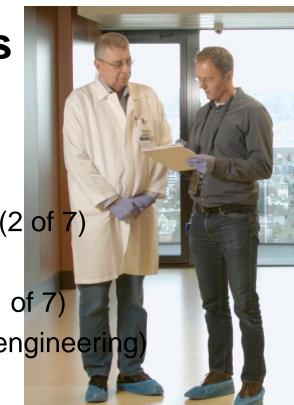
- PET-CT upcoming 2019
- Coaching lab work of small institutes with few patients
- Therapy with Xofigo Ra-223
- Quality of radiopharmaceuticals (Tc-Kits)
- SIRT
- SPECT-CT
- I-131 Therapy
- I-131 wastewater handling
- PET-CT



Profile of our 7 Inspectors

Group nuclear medicine and research

- Medical physicists (3 of 7)
- Physicist with training in radiopharmacy (2 of 7)
- Environmental engineer (1 of 7)
- Technician with laboratory experience (1 of 7)
- 5 with PhD (4 physics, 1 environmental engineer)
- Accompanied in the beginning
- 2 day education in auditing
- Training in nuclear medicine departments
- We are not ISO/IEC 17020:2012 certified inspectors
- FOPH has certification though



Inspection Process

- Team defines focus for 1-2 years
 - For example SIRT
- Inspect every department
- Final report
- Training day-workshop to present results

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Type of inspections

- Check every step from patient admission to release
- Questionnaire with open and closed questions
- Verification of legal requirements (ordinance, directives)
- Data analysis e.g. NRD or staff dose
- Measurements
- 2-3 inspections in 10 years in nuclear medicine dep.
- Usually we take half a day on site for an inspection

Patient protection

- Optimization
 - Checking NRD (Activity, CT DLP and CTDI)
 - Therapy dose calculation (I-131, SIRT)
 - Accurracy of applied activity (Activimeter QA)
 - CT protocols (work of medical physicist)
- Justification
 - Nationwide statistics can identify outliers
- Findings communicated with report or workshop

New issues

- Lu-177 and Lu-177m in the environment
- I-131 in waste incineration plants
- -> Develop new directives on how to handle these issues
- License for QA companies (activimeter, gamma cam)

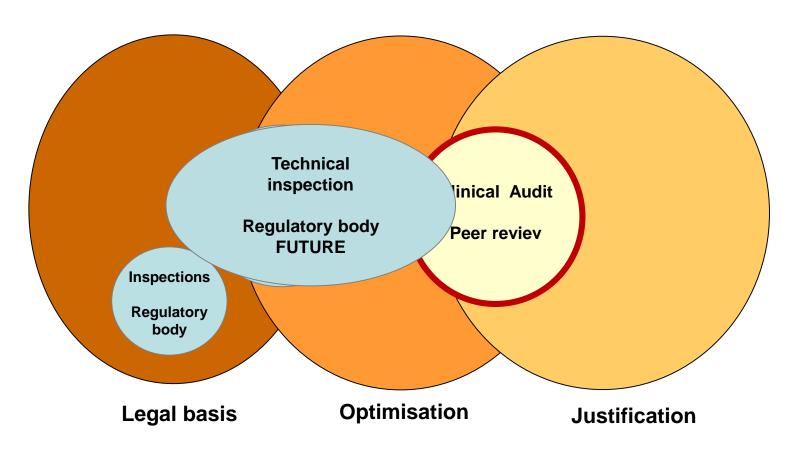
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Justification issue

- Nationwide statistics identify outliers
- Confront the hospital with outliers > they will change their practice for good (usually[©])
- Regulatory body and physicists are not meant to suggest medical treatments but we can ask questions so that the doctors think about their practice or mandate a third party equipped with the necessary competence
- In the future regular clinical audits will tackle the problem



Regulatory inspection vs clinical audit



Clinical audits performed by peers are starting



What is good, what could be better...

...with our method of inspection

Good

- Inspect all
- Take the best from all
- Final report and training day

To be improved

- Planning unannounced inspections to see what we usually don't see
- Incidence reporting
- Competence to tackle justification

Questions





FOPH Bern, Switzerland