

PUBLIC AFFAIRS UPDATE



SNM Provides Commentary on Supervision

A health insurance specialist for the Health Care Financing Administration's (HCFA's) Office of Clinical Standards and Quality Clinical Standards Group recently asked the Society to comment on the level of supervision required in the preparation of radiopharmaceuticals in hospitals. HCFA is considering a change in its rules. This is a complicated issue, because regulations from the various agencies (HCFA, the Nuclear Regulatory Commission [NRC], and individual state practice laws for medicine and pharmacy) seem to conflict.

For example, the NRC does not require "direct supervision." Instead, the agency requires that supervisors regularly review the work of those they supervise. However, the NRC specifically states that neither direct, in-person supervision or being within one hour's notice are necessary to meet the supervision and review requirement. HCFA is considering dropping the requirement for direct supervision by an appropriately trained registered pharmacist or doctor of medicine or osteopathy for the in-house preparation of radiopharmaceuticals.

SNM has strongly suggested that hospitals using trained nuclear medicine technologists to prepare radiopharmaceuticals under supervision as required by NRC 10 CFR Part 35 should be in compliance with all HCFA supervision requirements. The comment letter went on to indicate that should direct supervision be interpreted to require in-person supervision, this would be problematic for nuclear medicine, increasing overall costs of procedures without subsequent increases in patient safety.

To view the letter in full, visit the SNM website at www.snm.org or contact the Public Affairs Department at 703-708-9000.

SNM Comments on HCFA's Physician Payment for 2000

In a 3-page letter to HCFA, SNM stated that, in general, the society supported the points made by the American Medical Association. However, there were several provisions in HCFA's *Medicare Program; Revisions to Payment Policies Under the Physician Payment Schedule for Calendar Year 2000* that drew comment, as they directly affect nuclear medicine and SNM members.

Specifically, SNM identified instances in 3 CPT codes where HCFA was subverting the RVS Update Committee (RUC) process of researching and assigning reasonably considered relative values. In the first instance, the RUC recommended that Thyroid Carcinoma Metastases imaging (78020) be given an RVU of 0.67, but HCFA ignored the recommendation and retained the reduced RVU of 0.60. HCFA stated that this procedure was previously reported using unlisted CPT Code 78099 and would be billed approximately 15% of the time that 78018 is billed. HCFA decided that the recommended RVUs should be reduced to keep budget neutrality. It is our opinion that 78020 no longer has a relative value and should not be used for estimation of future new code relative values.

A similar situation occurred with the Urea Breath Test (C14). RUC determined that 78267 should be used for collection of the sample and that 78268 should be used for analysis and nuclear medicine physician interpretation. HCFA maintained that there was no physician work involved in either the collection of the sample or the interpretation of the test results—a determination that means that a nuclear medicine physician has no way of getting paid for performing the procedure.

Finally, SNM renewed its objection to the possibility of nurse practitioners and clinical nurse specialists performing nuclear medicine procedures without physician supervision. This is in direct contrast to HCFA's other provisions requiring direct or personal supervision of nuclear medicine procedures by a physician and could seriously affect patient care.

The letter in its entirety is available at the SNM website or

SNM Mid-Winter Meeting

Committee Meetings of Interest	Days	Times	Rooms
SNMTS National Council	Friday, February 11	12 pm–4 pm	Magnolia Ballroom 3
Radiopharmaceutical Commission	Saturday, February 12	8 am–10 am	Imperial
Coding & Reimbursement	Saturday, February 12	9 am–11 am	Magnolia III
SNM/ACNP Government Relations	Saturday, February 12	11 am–1 pm	Magnolia III
Procedure Guidelines Review	Saturday, February 12	1 pm–3 pm	Magnolia III
PEP	Saturday, February 12	3 pm–4 pm	Magnolia III
Board of Directors	Saturday, February 12	4:30 pm–7:30 pm	Azalea
House of Delegates	Sunday, February 13	8 am–12 pm	Ballroom

can be requested by contacting the Society of Nuclear Medicine's Public Affairs Department.

Advanced Nuclear Medicine Initiative Applications Available

The Office of Isotope Management, Office of Nuclear Energy (NE), announced that it is now accepting applications for the Advanced Nuclear Medicine Initiative (ANMI). The applications are for research programs involved in new and innovative applications for isotopes. The ANMI hopes to encourage research in areas such as diagnosis and treatment of cancer, HIV and other infectious diseases, and other innovative medical applications. Those interested in applying should go to www.ne.doe.gov.

Upcoming Events

February 9–14, SNM Midwinter, Westin Canal Place, New Orleans, LA

April 13, SNM Roadshow, Williamsburg, VA

Documents Available

1. SNM Comment Letter on Supervision
2. SNM Comment Letter on HCFA's Physician Payment Schedule
3. ACNP/SNM Comments on Sciencetech Study
4. HCFA Final Rule on RVU Fee Schedule for 2000
5. AMA Summary of RVU Changes
6. APC Taskforce Memo on HOPPS

—William Uffelmann and Amanda Sullivan

In Memoriam Nunzio J. Palladino, 1916–1999

On Sunday evening, December 12, 1999, former Nuclear Regulatory Commission (NRC) Chairman Nunzio J. Palladino passed away at the age of 83, after a long struggle with Parkinson's disease. At the time of his death, Dr. Palladino was being treated at Centre Community Hospital in State College, PA.

Dr. Palladino had a long and distinguished career in public service, in academia, and in the nuclear industry. Born on November 10, 1916, in Allentown, PA, he earned his Bachelor (1938) and Masters (1939) degrees in Mechanical Engineering at Lehigh University. He performed graduate work at the University of Tennessee and the University of Pittsburgh. From 1939 to 1959, he worked for the Westinghouse Electric Corporation. During this period, he served for 4 years as an engineer on loan to the Oak Ridge and Argonne National Laboratories and led the Westinghouse team that designed the reactor cores for the submarine Nautilus and the first full-scale nuclear electric generating plant at Shippingport, PA.

In July 1959, he went to Pennsylvania State University at the request of the dean of the College of Engineering, who wanted him to start a nuclear engineering department at the school. Dr. Palladino served as Professor of Nuclear Engineering and was appointed dean of the College of Engineering in 1966. At about the same time, he was selected by the Atomic Energy Commission as a member of its Advisory Committee on Reac-

tor Safeguards (ACRS). He served as a member of the committee from 1964 to 1974 and as ACRS chairman in 1967.

Dr. Palladino was active in public service in his home state, serving on the Governor's Energy Council and the Science Advisory Committee, the Pennsylvania Advisory Committee on Atomic Energy Development and Radiation Control, and as a member of the Governor's Commission on Three Mile Island (TMI). He also participated in an NRC Special Task Force on the TMI cleanup. In July 1981, President Reagan appointed him NRC Chairman, a position he held from 1981–1986.

Richard Meserve, NRC chairman, said, "With Dr. Palladino's passing, the NRC has lost one of its most distinguished elder statesmen, and the nation has lost one of its true nuclear pioneers. To those who knew him personally, the loss is far greater. By all accounts, and in spite of his many accomplishments, Dr. Palladino remained a warm, soft-spoken man who exhibited the unusual combination of great learning, common sense, and respect for those with whom he worked. At the NRC's 25th anniversary observance [January 2000] one place of honor will now be vacant, and the agency as a whole will miss his counsel and wisdom long after the celebration has faded in memory."

—Nuclear Regulatory Commission