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Dr. David Jaffray and Dr. Timothy Dowdell
Health Quality Ontario
Expert Panel on Safety and Quality of Energy Applying Medical Devices
qualityreviews@hqontario.ca

October 9, 2015

Dear Drs. Jaffray and Dowdell,

The Canadian Organization of Medical Physicists strongly supports the modernization of the Healing Arts Radiation Protection Act (HARP Act). Updating this important legislation will ensure high-quality therapy and medical imaging while protecting both health-care workers and patients.

The Canadian Organization of Medical Physicists (COMP), is the main professional body for medical physicists practicing in Canada. Three-quarters of our members are certified by the Canadian College of Physicists in Medicine (CCPM) as having proven competence in physics as applied to medicine. We have over 600 members across Canada with expertise in radiation therapy, x-ray imaging, magnetic resonance imaging, nuclear medicine and ultrasound imaging. We are able to provide advice from a national perspective.

We are pleased to recognize the recent creation of the Ontario Association of Medical Physicists and we suggest that they also be involved in discussions regarding revising the HARP Act and associated regulations in regulating energy applying medical devices.

Currently the HARP Act has a number of limitations including:

1. Image quality is not included but should be as part of a quality assurance program.
2. Training and qualifications of operators, particularly for high dose fluoroscopic equipment, are omitted.
3. Training and qualifications of radiation protection officers requires revision.
4. Other energy applying modalities including magnetic resonance imaging, nuclear medicine, ultrasound and lasers are absent.
5. There is a lack of a comprehensive approach to quality management of imaging

Canadian medical physicists have a long history of managing complex medical equipment and work closely with radiologists, nuclear medicine physicians and other professions for appropriate and optimized use of these modalities. Our members have contributed significantly to improving the associated quality management systems for the benefit of both patients and staff. We believe that modern imaging equipment should be managed within the context of a comprehensive quality management system which includes technical as well as interpretive quality control indicators.

Our members are recognised leaders in both imaging and quality management and as such have contributed to the regulatory environment in other Canadian jurisdictions. For example, our members were heavily involved in Manitoba's *Bill 37 The Radiation Protection Act*. In addition our members work with provincial Colleges of Physicians and Surgeons, including Manitoba and British Columbia, on their quality initiatives. We welcome the opportunity to help improve imaging safety and quality in Ontario as well.

For more information about COMP and our position on the HARP Act, please contact our Executive Director, Nancy Barrett, at 613-599-1948 or nancy.barrett@comp-ocpm.ca.

Sincerely,

Dr. Marco Carlone, MCCPM
President