



Training and Experience (T&E) Requirements

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ACMUI Recommendation

- Nuclear Regulatory Commission (NRC) staff should remove the attestation requirement for board certified individuals
- NRC staff should rewrite the attestation requirement for individuals seeking authorization under the alternate pathway
 - The rewritten attestation should not include the word “competency” but should instead read “has met the training and experience requirements.”

The Competency Problem

- Competency is difficult to *quantitatively* define
- Competency cannot be taught
- Competency cannot be reliably measured
- Competency cannot be guaranteed
 - How long does a competency attestation last?
- Competency has legal liability risk
 - Preceptors are reluctant to accept this risk

Board Certification

- Approved boards have agreed to meet NRC requirements
 - Certification processes are reviewed and recognized by NRC
- A curriculum and a body of knowledge can be defined
- Progress toward meeting defined requirements can be measured
- Board certification indicates that T & E requirements have been met.
 - Maintenance of Certification provides ongoing evidence of current knowledge
- An additional attestation is superfluous

Preceptor Attestation

- Training to board certification is a collective process.
 - The collective judgment of an entire residency program and the board examination process are employed
- Preceptor attestation is an individual process
 - An individual preceptor typically would provide only a small portion of the training and experience
 - Because of the liability, preceptors are reluctant to attest to training and experience not personally provided

Preceptor Attestation

- The problem is particularly acute for Radiation Safety Officers (RSO)
 - Any one license recognizes only one RSO
 - The regulation requires a RSO preceptor for a RSO candidate
 - RSO's are reluctant to precept individuals they did not personally train

Preceptor Attestation

- Although the regulation has been interpreted to allow a preceptor to attest to “indirect knowledge” of a candidate’s training and experience, the legal liability risk discourages this in practice

ACMUI Recommendation

- ACMUI recommends that NRC staff should remove the attestation requirement for board certified individuals

Alternate Pathway

- Most boards provide final certification following residency
 - The range is a few months to 2 years
 - American Board of Radiology is the only board that certifies residents by the completion of residency
 - This will change for residents entering training no later than 2010
- This forces boards to train to the "Alternate Pathway" requirements
 - *This was not the intent of the regulation*

Alternate Pathway cont.

- Although the alternate pathway was designed to allow individuals who are not (or not yet) certified by a recognized board to achieve authorized user status, the current regulation functionally limits the availability of the pathway

Alternate Pathway cont.

- Preceptors are reluctant to write Alternate Pathway preceptor statements in part because of the attestation of “competence”
- The result will be that graduates of residency programs will be unable to become authorized users for a variable amount of time after completion of residency

Alternate Pathway cont.

- Graduates may be unable to work until they achieve board certification
- Small and rural practices will be most disadvantaged
- Diagnostic nuclear medicine studies may be unavailable in some areas

ACMUI Recommendation on Alternate Pathway

- ACMUI recommends that the standard used be both measurable and achievable
 - ACMUI recommends that the phrase “has met the training and experience requirements” replace the term “competency”
- This will permit graduates to practice clinical nuclear medicine between completion of residency and board certification

Summary

- ACMUI believes that the T&E requirements in 10 CFR Part 35 have had unintended consequences for residency training
- If not corrected, those consequences will ripple through to both the clinical practice and availability of clinical nuclear medicine
- ACMUI believes that its recommendations will mitigate the unintended adverse impact on both the regulated community and the general public

Acronyms

- ACMUI – Advisory Committee on the Medical Uses of Isotopes
- CFR – Code of Federal Regulations
- NRC – Nuclear Regulatory Commission
- RSO – Radiation Safety Officer
- T&E – Training and Experience