

ACMUI Subcommittee on Board Certification Pathway for AU Status Final Report

Introduction: Board certification has been an integral part of the training of Authorized Individuals recognized by NRC to safely handle radioactive materials for medical uses. NRC recognizes certification boards that provide training and experience (T&E) that meets the requirements defined in 10CFR35 and accepts board certification in granting authorized status to individuals trained and certified by recognized certification boards.

The Problem: When there is a time delay between completion of training and final board certification, graduates of training programs leading to NRC recognized board certification cannot become NRC Authorized Individuals until board certification has been achieved. This has the potential of limiting employment possibilities for these graduates. The only way for these residency or fellowship graduates to obtain Authorized Individual status between completion of training and final board certification is via the alternate pathway.

Although all recognized certification boards require their diplomats to be trained to the T&E requirements of 10CFR35, there are very different record keeping requirements between the board certification pathway and the alternate pathway. The alternate pathway was developed to provide a mechanism to allow qualified individuals in fields of medicine not covered by one of the NRC recognized certifying boards to achieve authorized individual status. These cases represent individual exceptions and are subject to a higher record keeping requirement than training programs leading to certification by one of the recognized certification boards. The alternate pathway was not intended to replace board certification.

Most employment opportunities for medical professionals who work in fields which use radioactive materials for diagnosis and treatment of disease require that the individual have NRC authorized status (or Agreement State equivalent). Most graduates cannot defer their employment until final board certifications and most practices cannot employ an individual who is not authorized to handle radioactive materials. This reality forces trained and qualified individuals to seek authorized status via the alternate pathway, invalidating the intent of the board certification pathway. Many training programs will be unable to provide alternate pathway preceptor statements because of the increased documentation requirement of the alternate pathway compared to the board certification pathway.

Although there are individuals currently affected by this dilemma, the problem will increase dramatically as the American Board of Radiology (ABR) changes its training and certification paradigm in 2010. For residents entering ABR diagnostic radiology training programs beginning in 2010, the time gap between completion of residency training and board certification will be 15 months. The ABR certifies between 1,300 and 1,500 diagnostic radiology graduates annually. These individuals will be functionally unemployable for 15 months after completion of training, if their employment depends on the ability to use radioactive materials. Rural and underserved areas will be most

affected, as they are more likely to be served by solo or small group practices unable to support a care provider who cannot obtain NRC authorized individual status.

The subcommittee was charged with proposing a solution to the problem outlined above. Specifically, the subcommittee was charged with developing a solution for American Board of Radiology diplomats that would allow trainees to become authorized users in the 15 months between completion of training (including all training and experience required for Authorized User (AU) status) and final board certification. The subcommittee decided to make its recommendation general enough that it could be employed by any certification board that determined that the time between completion of training and final board certification created a significant burden for its diplomats. *No certification board would be required to adopt this proposed solution.*

Proposed solution:

- NRC recognized certifying boards could issue a separate certificate/certification at the end of training which attests to the successful completion of the appropriate T&E requirements for the Authorized Individual status the graduate is seeking.
- The subcommittee proposes that NRC accept this certification for the board certification pathway.
- This solution preserves the integrity, utility, and intent of the board certification pathway and provides the same level of assurance of the quality and completeness of training as final board certification.

The American Board of Radiology has agreed in principle to this approach. The subcommittee proposes that the solution be proposed to any other NRC recognized certifying board which experiences a similar problem with the delay between completion of training and final board certification.

Since the initial proposal, NRC staff has asked for additional clarification and detail. Staff submitted a series of four questions which the subcommittee addresses as clarifications to its proposal. Question three was divided into two parts. Although the questions refer specifically to the American Board of Radiology, the subcommittee has generalized its recommendations to be applicable to any recognized certifying board.

NRC Staff Questions: (with bulleted subcommittee proposals)

1) *Provide clarification that the separate "AU-eligible" certificate issued by the ABR at the end of the training (which attests to the successful completion of the appropriate T&E requirements and NRC-tailored examination) is indeed an ABR-recognized certification; and not just a certificate.*

- Subcommittee recommends that the certification of completion of T&E requirements provided by the certifying board “stands alone” and is fully recognized by the certifying board.

2) *Provide clarification that the proposed certification is indeed a separate, additional certification; and not just an interim certification. Also, confirm for which of the following T&E requirements the proposed separate, additional certification is being recommended: 35.290, 390, 392, and/or 394.*

- Subcommittee recommends that the certifying boards clarify that the AU T&E certification is an additional independent certification, not just an interim certification
- Subcommittee recommends that the certifying board specifically state which specific T&E requirements the certification applies to

3a) *Please clarify whether successful completion of the NRC-tailored examination will be required for ABR candidates who do not pursue or do not achieve the proposed certification. In other words, for those individuals, will the NRC-tailored examination be included in the ABR final certification exam offered at the end of the extended clinical experience?*

- Subcommittee acknowledges that any one certifying board may take a slightly different approach to satisfying question #3a
- Certification boards could take two possible pathways, each of which would lead to AU eligibility for trainees who successfully complete the T&E requirements, including any NRC-tailored examination(s).
 - Possible Pathway A
 - All trainees would be required to acquire the necessary training and experience and to pass the required examinations to become an Authorized User
 - If the trainee does not successfully complete the AU training, the trainee cannot become board certified
 - Possible Pathway B
 - Training programs could offer two pathways, one leading to board certification with AU certification and a second leading to board certification without AU certification
 - A trainee who obtains board certification without AU certification and subsequently desires to become AU eligible would have to obtain the necessary T&E by the alternate pathway and would not be eligible to obtain AU status by board certification

3b) *We (NRC) need to ensure that diplomats of the final ABR certification who did not receive the proposed certification (who either did not take or did not pass the NRC-tailored examination) will meet all of NRC's T&E for the certification pathway. Examples of such candidates include: a.) individuals who are not seeking AU status initially and therefore do not seek the certification after successful completion of the NRC-required T&E; or b.) candidates who fail the NRC-tailored exam.*

- Candidates who either do not seek or do not obtain AU certification as part of their training program cannot achieve AU status by the board certification pathway
 - Since the AU T&E certification would be a separate document, applicants for AU status who do not possess this document could not become AUs by the board certification pathway
- Trainees who do not achieve AU certification by the board certification pathway must apply for AU status individually by the alternate pathway

4) *If the ABR wishes to pursue this approach, ABR will need to submit a request for NRC to review their proposal for additional certifications, since it is a change from the currently recognized certification processes. Additionally, ABR should confirm that each of its existing recognized certification processes will not change, or point out proposed changes.*

- Certifying boards that wish to separate AU certification from final board certification would need to submit the proposed changes to NRC for evaluation
- Certifying boards would need to indicate whether the proposed change replaces their prior recognized certification process or represents an addition to the approved certification process(es)

The initial proposal, along with the clarifications in response to the NRC staff questions, comprises the subcommittee's recommendation to the ACMUI.