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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Perhaps the NRC should go back to its original preceptor concept introduced 50 (?) years ago. There were no board certifications required but the preceptor (mentor) had the responsibility to ensure that training, both didactic & clinical (practical) was adequate to protect health & safety & ensure medical efficacy. With narrow (specific) requirements (i.e. Board Certifications), applicants may receive certification without complete knowledge & skills in a particular discipline; with broad requirements, which may exclude certification, applicants must possess complete knowledge & skills in a given discipline. The broad interpretation of "adequacy" precludes applicants from presenting adequate knowledge or skills certified by a board. Applicants must show complete knowledge & skills in a given discipline to be authorized for those specific procedures. Board Certification may omit or excuse lack of knowledge & skill (if indeed the examined passes with less than 100% score) where no certification would require demonstration of 100% in a given discipline.

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