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**To:** <cmf@nrc.gov>  
**Date:** 5/9/06 12:10PM  
**Subject:** ABR Radiologic Physics Recognized Status

Cindy:

As a follow-up to our conversation this morning, I have attached the draft of the ABR response to Mr. Essig regarding the final questions related to the ABR's application for Recognized Status of the Radiologic Physics (RP) certification. I appreciate your willingness to review it in advance and offer any suggestions for clarification/modification before it is finalized. Previously (04/24/2006), you and I had discussed the plan for assuring that the international candidates satisfied all the requirements placed upon US candidates. As stated, it is the position of the ABR that all candidates for Radiologic Physics certification must satisfy all of the eligibility conditions established (no distinction between certificates in this regard). The procedure for candidates holding only foreign degrees involves contract with one of a specified list of credential evaluation services as is outlined in the letter. Recall, in our discussion of this process, your response was that it seemed well designed to document/assure equivalency.

At this point, I am waiting to receive the copies of the RP certificates and for some clarifications/modifications to be posted on the ABR website before assembling the final packet for submission to Mr. Essig. I look forward to receiving your comments over the next few days so that we might incorporate any suggestions you may have that would clarify and/or strengthen our application.

Thank you in advance for providing this review.

Regards,

SR Thomas

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CMF (Cynthia Flannery)

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## Response to the NRC

Refer to email of March 9, 2006 (from C. Flannery, CHP)

Prepared by: Stephen R. Thomas, Ph.D.

Date: May 2, 2006

## Draft

U.S. Nuclear Regulatory Commission

Attn: Mr. Thomas H. Essig, Chief

Materials Safety and Inspections Branch (MS T8F3)

11545 Rockville Pike

Rockville, MD 20852

Reference: NRC Recognized Status for the ABR Radiologic Physics certification

Dear Mr. Essig:

The American Board of Radiology believes that we have addressed all of the issues that the NRC has raised with regard to our application to be granted NRC Recognized Status for the ABR Radiologic Physics certification processes. In accordance with instructions received, this response is directed toward the March 9, 2006 email from Cynthia Flannery, CHP. For continuity, some of the earlier correspondence is attached also.

### Issue 1 – Examination Topics:

**NRC Concern:** a.) Regarding the list of exam topics for Therapeutic Radiologic Physics: “ABR will need to ensure that they test their candidates on all of the topics listed in 10 CFR 35.51(a)(3) and that it is accurately reflected in the list of exam topics on ABR's web site.”

**ABR Action:** All of the topics listed by the NRC are encompassed in the ABR examination for Therapeutic Radiologic Physics. The ABR website under the section “Radiologic Physicists/Primary Certification/Study Guide” has been updated to include the exact wording of all the topics. (See enclosed ABR website material print out)

**NRC Concern:** b.) Regarding the list of exam topics for Diagnostic Radiologic Physics and Medical Nuclear Physics: “Candidates of the other two sub-specialties (Diagnostic Radiologic Physics and Medical Nuclear Physics) for which ABR is seeking recognition under 10 CFR 35.50 (Training for Radiation Safety Officer) must be tested on the topics listed in 10 CFR 35.50(a)(2)(iii) and this must be accurately reflected in the list of exam topics on ABR's web site.”

**ABR Action:** All of the topics listed by the NRC are encompassed in the ABR examination for Diagnostic Radiologic Physics and Medical Nuclear Physics. The ABR website under the section “Radiologic Physicists/Primary Certification/Study Guide” has been updated to include the exact wording of all the topics. (See enclosed ABR website material print out.)

### Issue 2 – Candidates with International Graduate Degrees:

**NRC Concern:** “It was noted on ABR's website that ABR accepts international medical graduates as candidates for ABR certification in Radiologic Physics. ABR will need to determine whether the international candidates meet the same requirements as other ABR Radiologic Physics candidates that are required to meet NRC's criteria (i.e., degree requirements, degree from an accredited college or university, minimum number of years of full-time practical training and/or supervised experience in medical physics, and training and experience under the supervision of a medical physicist who is certified in medical physics by a specialty board that is recognized by the NRC or an Agreement State). If the international candidates do not meet NRC's criteria, the ABR will need to provide a method that ABR will use to distinguish the diplomates who do meet the criteria in 35.50 and 35.51 from those who do not.”

**ABR Action:** It is the ABR's position that international graduates who seek certification in Radiologic Physics through the ABR must satisfy all of the eligibility conditions established. There is no distinction between certificates other than that reflecting the 3 specialties (i.e., Therapeutic Radiologic Physics, Diagnostic Radiologic Physics, and Medical Nuclear Physics). Upon receipt of applications, the Physics Credential Evaluating Committee reviews them and requires all candidates (including international) to have satisfied the minimum number of years of full time training under the supervision of a diplomate certified by the ABR. In addition, for those candidates holding only foreign degrees, the ABR has established a process whereby the candidate must demonstrate that their foreign degrees are equivalent to those granted from an approved institution in the United States and that the granting institution is equivalent to a regionally accredited institution in the United States. The process and instructions to candidates are described in the attachment. *[Example letter to candidate with instruction page]* In brief, those international candidates with foreign degrees only will be required to contract with one of five approved credential evaluation organizations. The 5 organizations have been chosen by the ABR as they are all members of the National Association of Credential Evaluation Services (NACES) that adhere to a standard of ethical procedures and excellence in the field of foreign educational evaluation. The report, to be received directly by the ABR from the service, will provide a specific statement regarding the equivalency (or not) of degree(s) received and awarding institution(s). If either degree or institution is reported as non-equivalent (below standard), that candidate's application will not be accepted. Should an international candidate decide not to engage in the evaluation process, he/she would be considered ineligible and not allowed to sit for the examination.

### **Issue 3 – Clarification of Eligibility for Part 2 and Part 3 Examinations:**

**NRC Concern:** "The third bullet under Part 1 of the "Requirements for the Primary Exams" of ABR's website states that Part 1 of the exam can be taken by individuals who have not yet completed the degree requirements but "are enrolled in an acceptable graduate program in medical physics." Clarification is needed to ensure that these candidates will meet the degree requirements prior to successfully completing Parts 2 and 3 of the exam."

**ABR Action:** Eligibility for Part 1 examination requires that the candidate hold an approved advanced degree (masters or doctorate) with the single exception of students enrolled in a graduate program accredited by the Commission on Accreditation of Medical Physics Educational Programs (CAMPEP). Those students are allowed to take Part 1 prior to completion of their graduate degree. In order to be eligible for Parts 2 and 3, the graduate degree must have been awarded. In order to clarify this position, the following bullet has been added to the ABR website section describing the requirements for Part 2 (under "Radiologic Physicists/Primary Certification/Requirements"):

- You must hold a master's or doctorate degree from an approved institution (accredited by a regional accrediting body) in medical physics, radiologic physics, health physics, physics, or other relevant physical science or engineering discipline.

To be eligible for Part 3 (Oral Examination), the candidate must have passed Part 2 and thus will have met the degree requirements.

(See enclosed ABR website material print out.)

With the above response to the NRC concerns as stated in the email correspondence of March 9, 2006, the ABR feels that all issues have been addressed satisfactorily within the scope of the NRC requirements. We look forward to hearing from you as we complete this process of gaining Recognized Status for the ABR Radiologic Physics certifications. Please contact us directly should there be any remaining questions.

Sincerely,

SRT

CC. Cynthia M. Flannery, CHP

**Enclosures:**

- 1.) NRC letter of 11/21/2005 (C Flannery to RR Hattery)
- 2.) ABR informal response – email of 02/17/2006 (SR Thomas to C Flannery)
- 3.) NRC email of 03/09/2006 (C Flannery to SR Thomas)
- 4.) Associated pages from the ABR website
- 5.) Example letter to international candidates with foreign degrees only
- 6.) ABR-approved Credentials Evaluation Organizations including Instructions to Applicants
- 7.) The ABR Radiologic Physics Certificates:  
    Therapeutic Radiologic Physics; Diagnostic Radiologic Physics; Medical Nuclear Physics