

**PRM-35-20
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As a clinical medical physicist since 1993, I fully support the PRM-35-20 Petition for Rulemaking, submitted on behalf of the AAPM to recognize medical physicists certified by either the ABR or the ABMP on or before October 24, 2005.

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The exclusion of pre-2005 certifications would require these individuals to undergo the inappropriate alternative pathway. This would place an unnecessary and considerable professional burden on certified individuals for no apparent reason. The value of pre-2005 certification is not under controversy or dispute. Certification by the ABR and ABMP are considered equivalent by radiation oncology organizations including ASTRO, AAPM and ACR.

The current regulation is not needed for reasons of safety. There is no evidence that individuals certified after October 24, 2005 are more qualified to serve as AMPs and RSOs; in fact the converse may be true. It is reasonable that those that have been implementing radiation safety and related procedures professionally for years are at least as qualified as newly certified individuals. As a practical matter, many newly certified physicists continue to receive the benefit of additional knowledge and training from their more experienced colleagues.

The current regulation would cause an additional administrative burden on hospitals and other health care facilities, and would likely result in a shortage of AMPs and RSOs.

For all these reasons I endorse the AAPM petition.

Sincerely,

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