**From:** Sandra Nissen
**To:** Flannery, Cindy;
**cc:** Sandra Nissen;
**Subject:** CLT Requirements
**Date:** Thursday, June 25, 2009 6:38:48 PM

# INME

## Institute for Nuclear Medical Education

Approved and Regulated by The D.P.O.S., Department of Higher Education in CO

June 25, 2009

Ms. Cindy Flannery
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Fax: 301.415.5369

Dear Ms. Flannery,

**INTRODUCTION**

Regulatory agencies typically accept an Attestation by a Preceptor that a candidate for licensure as the Authorized User (AU) and/or Radiation Safety Officer (RSO) meets the requirements of Part 35 as stipulated in 10 CFR 35.290(c)(1)(i) for 80 hours of Classroom and Laboratory Training (CLT), and that the classroom training must be in specific topics of:

(A) Radiation physics and instrumentation
(B) Radiation protection
(C) Mathematics pertaining to the use and measurement of radioactivity
(D) Chemistry of byproduct material for medical use
(E) Radiation biology.

The Nuclear Cardiology Board (CBNC) has been given the option of requiring different classroom hours and topic distribution, but has elected to "require the same CLT as the NRC." The CBNC also requires an Attestation by a Preceptor of that fact.

**INSTITUTE FOR NUCLEAR MEDICAL EDUCATION (INME)**

The programs offered by INME follow the curriculum requirements, the hours requirements (hours actually spent in the classroom), evaluation by written examination, attendance and actual, closed book/notes examination. Over 3,000 physicians have completed 80, 100 or 200 hours in these INME programs.

INME IS NOT CHANGING / LOWERING ITS EDUCATION EXPERIENCE.

**ISSUE**

We are continually approached by individuals and organizations that have provided us with proposals for changing our programs. Each of these proposals is based on ACTUAL PROGRAMS CURRENTLY PROVIDED BY OTHER

ORGANIZATIONS.

Therefore:

1. Based on the actions of other organizations, would your agency accept for CLT

   A. An 80-hour program that will provide a certificate for 100 hours if you do take-home material (no time tracking of that material)?

   B. A 100-hour program that, if you need 200 hours, you simply take the same 100-hour program AGAIN?

   C. An 80-hour program where a significant portion of the curriculum is NOT Applicable to the content specified by 10 CFR 35 --for example, MRI, CT, Angiography, and Interpretation of procedures (readings) constitute 20+ hours of the offering?

   D. An "on-line" program that attests that 80/100 hours may be completed in 1-3 days "on-line"? -- clearly, not 80/100 hours, but the program does not track any hours in any way. The program provides a certificate indicating the enrolled hours; i.e., 80/100 or 200 hours.

2. Recognizing that many agencies have responded to the above and do NOT accept such programs, how would your agency know the program was one of the above and/or potentially fraudulent if you have a signed Attestation from the Preceptor that the candidate meets the requirements of 10 CFR 35.290(c)(1)(i)?

3. What action or actions would your agency take if you identified a fraudulent Attestation?

We realize that these are not easy questions, except for 1.A-D, but we would appreciate a prompt response. All of these activities exist in your jurisdiction. Clearly 2. and 3. do not apply if what is acceptable is not reasonably defined.

Sincerely,

Charles H. Rose, MA, MPH, D(ABSNM)
Program Director

CHR:scn

Cc:file

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