INME

Institute for Nuclear Medical Education

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

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Am Council Education
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USNRC
10 CFR 19
10 CFR 20
10 CFR 35
274b AEC73
Agreement States
Bd Medical Exam
Am Assoc Collegiate Reg

Credits Provided
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CME
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11 March 2010

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Elmo E. Collins, Regional Administrator
U.S. Nuclear Regulatory Commission, Region IV
612 E. Lamar Blvd., Suite 400
Arlington, TX 76011-4125

Dear Radiation Safety Colleague,

It has been called to our attention that many regulatory agencies are concerned that programs for Classroom and Laboratory Training (CLT) may not and/or do not validate who is receiving the training. For classroom programs, attendance is not taken and participants may "sign in" for others (i.e., 14 present by 19 signatures.) For the so-called "on-line" programs, there is no way to determine who or even if someone, is actually "putting in the time." Some have documented 80 hours in a single weekend. Hence, there is often little or no traceability when verification of a participant's attendance is needed or requested by individuals with a need to confirm the number of hours (e.g., preceptors, regulatory agencies.)

INME has always required valid identification (name, address, social security number, etc.) for each and every participant. In addition, we require a physical sign-in for all participants, morning and afternoon, for a total of 18 times during our programs. We are now implementing the additional security of taking a photo of each participant for our security records.

Unlike some other programs, we have never had the integrity of our attendance questioned. We now are adding this additional measure of photographing participants to assure continued, 100% accuracy and thus, compliance.

Sincerely,

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

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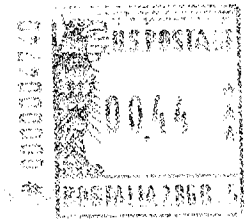

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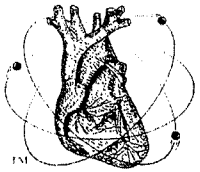

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