April 6, 2010

Christian E. Einberg, Chief
Radioactive Materials Safety Branch
Division of Materials Safety
and State Agreements, FSME
Mail Stop T8 E24
US Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, MD 20852-2738

Re: Request for Recognized Status for the American Board of Medical Physics

Dear Mr. Einberg:

The American Board of Medical Physics (ABMP) requests recognized status for its certifications in Medical Health Physics (MHP) in accordance with the requirements in 10 CFR Sections 35.50(a).

The American Board of Medical Physics was established in 1987 and certifies physicists and related scientists who practice clinical medical physics and perform research on human subjects. The American Board of Medical Physics is sponsored by the American College of Medical Physics [ACMP], the American Association of Physicists in Medicine [AAPM], the American Academy of Health Physics [AAHP] and the International Society for Magnetic Resonance Imaging in Medicine [ISMRM]. The program for certification in Medical Health Physics was first offered in 1993. The Board maintains a web site, www.abmpexam.com. Descriptions of the sponsoring organizations can be found on the web site. The web site also lists the current Board of Directors, the panel chairs, the Executive Director and the test consultant. The test consultant, Dr. James Hecht of Credentialing Services, Inc., is the certified psychometrician for the Board and maintains psychometric data on all examinations given by the Board.

The examination process of the ABMP consists of both written and oral examinations. The written examination consists of two parts. Part I of the examination is a general multiple choice examination covering all areas of medical physics and Part II is a 150 question multiple choice examination specific to medical health physics.
The subjects and distribution of materials covered in Parts II and III of the MHP exam are listed on the web site and copies are attached to this letter. Candidates who successfully complete the written exam are eligible to take Part III of the examination process. The third part of the examination is an oral examination conducted by three examiners over a two-hour period.

Previous discussion with Dr. Howe of the NRC staff regarding eligibility have lead the Board to take the same approach as the ABR, considering every candidate based on the 10CFR50(a) criteria as well as those diplomats who met this criteria at the time of their certification; providing an RSO eligibility designation on their diplomas and on our web-site (see attached example).

During our discussion with Dr. Howe a number of issues were raised that should be clarified in the following statements:

1. Can the Board state that when it reviewed the transcripts of those with degrees (or majors) in areas that could not be clearly identified as "physics," "medical physics," "engineering," "applied mathematics" or a "physical science" that the degrees did in fact fall into one of these categories?

Response: Yes. The Board requests a copy of the transcripts of any candidate or diplomat whose degree status is questionable to ensure compliance with 10CFR35.50(2)(i). In order to further assure this compliance, the following statement will be added to our applicant's handbook available at the Boards web-site:

1. Education
A graduate degree in physics, medical physics, or other appropriate related field from an accredited university is required. Validation of terminal degree will be required directly from the granting institution. Any candidate whose degree program is not in medical physics will be required to request official transcripts be sent to the Board to validate appropriate course work.

2. In your web site, it says that individuals already board certified by certain boards can apply directly for Part II. Part II repeats the educational criteria for PART 1. Does the board review the education of the candidate that is already board certified by another board?

Response: Yes. The Board requests a copy of the transcripts of any candidate or diplomat whose degree status is questionable to ensure compliance with 10CFR35.50(2)(i).

3. Your web site does not specify the content of your examination with respect to the medical physics subspecialties of clinical diagnostic medical physics or nuclear medicine medical physics. Do the examinations assess knowledge and competency in clinical diagnostic medical physics or nuclear medicine medical physics (in addition to radiation safety and any other form of medical physics)?
Response: Regarding the examinations assessment of knowledge and competency in clinical diagnostic medical physics or nuclear medicine medical physics, both the written and oral exams include questions that relate to clinical competency in both diagnostic and nuclear medical physics including imaging, physiology, biology, quality assurance and radionuclide therapy. The weighting of these areas is presented on the website in the information booklet that may be found at: (http://www.abmpexam.com/INFO%20BOOKLET%202009.htm).

4. How are the conditions of 35.50 (a)(2)(ii) addressed?

Response: as stated on the website, candidates applying for Part II of the examination will also be required to obtain two (2) letters of endorsement to verify their work experience and professional qualifications. Acceptable verification must be obtained from a Certified Medical Physicist and a Certified Physician who practices in a medical specialty related to the candidate's field, and who have personal knowledge of the candidate's training, experience, and ethical standing. These requirements in fact go beyond Part 35.50 in requiring both the supervision of the candidate by a Certified Medical Physicist and a Certified Physician.

There were some concerns expressed about residency programs. The Board looks to the Commission on Accreditation of Medical Physics Education Programs, Inc. to qualify acceptable residency programs. Options available for clinical residency training under CAMPEP include:

- A formal 2-year residency program at an academic center offering a complete range of treatment techniques and with many, often specialized, qualified medical physicists (QMP). Such a program, if CAMPEP accredited, may serve as a primary site.
- A formal 2-year residency offered at a center with more limited resources but affiliated with a CAMPEP accredited center.
- Incorporation of a residency program in a professional degree where it may replace the research/project component of the more conventional Masters and Doctoral degrees.

Taken together with the additional 1 year of experience required for Part III of the exam, any candidate who has been in a residency program will have at least if not more than 2 years of full-time practical training and/or supervised experience in medical physics. We have not certified any diplomats under this pathway to date.

Finally, we would like to respectfully submit that ABMP has been working on this issue of recognition of our diplomats with the NRC for a number of years now. We have answered innumerable queries from our diplomats on when this issue would be settled. We would hope that the information provided here will convince the NRC that ABMP is committed to faithfully ensuring that all candidates designated as RSO eligible have met all of the requirements necessary.
Please do not hesitate to contact me if I can provide further information or answer any further questions.

Sincerely,

Benjamin R. Archer Ph.D.

Benjamin R. Archer Ph.D.  DABMP, DABR, FACP, FAAPM
Executive Director
American Board of Medical Physics
P.O. Box 487
Barker, TX  77413-9800
(281)944-9482
abmpexdir@comcast.net
ABMP EXAMINATION CONTENT
OUTLINES

Part I. General Medical Physics (may be used for either the Medical Health Physics or MRI Physics certification)

<table>
<thead>
<tr>
<th>SUBJECT</th>
<th>WEIGHT</th>
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<tbody>
<tr>
<td>Radiological Physics</td>
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<tr>
<td>Radiation Detection and Measurement</td>
<td>15</td>
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<tr>
<td>Biology and Radiobiology</td>
<td>5</td>
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<tr>
<td>Radiation Protection</td>
<td>15</td>
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<tr>
<td>Imaging and Other Diagnostic Studies</td>
<td>17</td>
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<tr>
<td>Principles of Therapy</td>
<td>15</td>
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<tr>
<td>Anatomy, Physiology, and Medical Science</td>
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<td>Computers</td>
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Part II Medical Health Physics

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<td>Instrumentation</td>
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<td>Laboratory Design</td>
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<td>Standards and Regulations</td>
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<tr>
<td>Structural Shielding Design</td>
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<tr>
<td>Radiation Oncology: Quality Assurance</td>
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<td>Brachytherapy: Quality Assurance</td>
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<td>Diagnostic X-Ray: Quality Assurance</td>
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<td>Nuclear Medicine: Quality Assurance</td>
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<td>Radiopharmaceutical Therapy</td>
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<td>Non-Ionizing Radiation</td>
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Directions. Please complete this form as much detail as necessary and mail to the ABMP at the address given on the form.

American Board of Medical Physics, Inc.
Candidate Letter of Endorsement
P.O. Box 487
Barker, Texas 77413

Candidate: ____________________________
Certifying Physician: ____________________
Year Certified: __________________________

☐ MRI or ☐ MHP or ☐ RSO Eligibility
Certifying Board: ________________________
Specially: ______________________________

Please clearly specify your knowledge of candidate's clinical and/or human research professional experience.

If RSO Eligibility is checked off above, please specify your knowledge of candidate's experience with Radiation Safety related issues like shipping and receiving of radioactive materials, surveying, emergency planning, etc.

Signature ____________________________ Date ____________________________
ABMP Candidate Endorsement
Certifying Physicist

American Board of Medical Physics, Inc.
Candidate Letter of Endorsement
P.O. Box 487
Barker, Texas 77413

Candidate:
Certifying Physicist:
Year Certified:

☐ MRI  or  ☐ MHP  or  ☐ RSO Eligibility
Certifying Board:
Specially:

Please clearly specify your knowledge of candidate’s clinical and/or human research professional experience.

If RSO Eligibility is checked off above, please specify your knowledge of candidate’s experience with Radiation Safety related issues like shipping and receiving of radioactive materials, surveying, emergency planning, etc.

Signature _____________________________  Date ___________________________
The American Board of Radiology

Organized through the cooperation of the American College of Radiology, the American Roentgen Ray Society, the American Radium Society, the Radiological Society of North America, the Section on Radiology of the American Medical Association, the American Society for Therapeutic Radiology and Oncology, the Association of University Radiologists, and American Association of Physicists in Medicine hereby certifies that

John Sample Doe has pursued an accepted course of graduate study and clinical work, has met certain standards and qualifications and has passed the examinations conducted under the authority of The American Board of Radiology.

On the 4th day of June, 2005 the above demonstrating to the satisfaction of the Board that he is qualified to practice the specialty of Diagnostic Radiologic Physics

RSO Eligible

Certificate No. 00000

Valid through 2015
The American Board of Medical Physics

Hereby certifies that

Sample

Has satisfactorily met the professional standards and clinical experience requirements in medical physics to qualify for

Certification in Medical Physics with special competence in

Medical Health Physics

RSO Eligible

January 1, 2008

DATE

Chairperson

Secretary