



Panel Discussion: Relaxation of Preceptor Attestation Requirements and Extending Grandfathering to Certain Certified Individuals (Ritenour Petition)

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American College of Radiology (ACR): Overview

- ACR is a professional association representing approximately 34,000 radiologists, radiation oncologists, interventional radiologists, nuclear medicine physicians, and medical physicists.
- Mission: To serve patients and society by maximizing the value of radiology, radiation oncology, interventional radiology, nuclear medicine and medical physics by advancing the science of radiology, improving the quality of patient care, positively influencing the socio-economics of the practice of radiology, providing continuing education for radiology and allied health professions and conducting research for the future of radiology.
- ACR is headquartered in Reston, VA, with a government relations office in Washington, DC, and a clinical research office in Philadelphia, PA.

Preceptor Attestation (1 of 4)

Recommendation: Attestation requirements should be eliminated for...

- Individuals with board certification.
- Grandfathered individuals under 10 CFR 35.57.

Preceptor Attestation (2 of 4)

Why?

- Board certification proves mastery of knowledge.
- Preceptor attestation + certification is unnecessarily redundant.
- Attestation is useful to NRC for only the alternate pathway.
- Maintenance of Certification (MOC) requires knowledge upkeep.

Preceptor Attestation (3 of 4)

Recommendation: Modify the requisite language in the attestation statement.

- Replace language, "a level of competency to function independently."
- Instead, use language specifying that base T&E regulatory requirements have been met.
- Residency programs can review the individual's records to provide the attestation.

Preceptor Attestation (4 of 4)

Why?

- The term "competency" has certain implications in medicine.
- The liability of the preceptor is unclear; some are wary of serving in this role with the current language.
- Qualified and willing preceptors may be difficult to find for some alternate pathway-individuals.

Ritenour PRM (1 of 2)

Recommendation: NRC should grandfather appropriately board certified individuals who had not been named on an NRC or Agreement State license prior to October 25, 2005.

- Include AUs and others in the fix; not just AMPs and RSOs.
- Do not require additional documentation or attestation for grandfathering board certified individuals.

Ritenour PRM (2 of 2)

Why?

- Appropriately board certified individuals should not be required to invoke the alternate pathway to achieve authorization.
- The alternate pathway is prescriptive by design only because it is meant to verify knowledge in the absence of certification.