

SUNSI Review Complete  
 Template = ADM-013  
 E-RIDS=ADM-03  
 ADD=Sarah Lopas, Carrie  
 Crawford

<b>As of:</b> 1/10/19 9:09 AM <b>Received:</b> January 09, 2019 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1k3-9716-75gd <b>Comments Due:</b> January 29, 2019 <b>Submission Type:</b> Web
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# PUBLIC SUBMISSION

COMMENT (16)  
 PUBLICATION DATE:  
 10/29/2018  
 CITATION: 83 FR 54380

**Docket:** NRC-2018-0230

Training and Experience Requirements for Different Categories of Radiopharmaceuticals

**Comment On:** NRC-2018-0230-0001

Training and Experience Requirements for Different Categories of Radiopharmaceuticals

**Document:** NRC-2018-0230-DRAFT-0018

Comment on FR Doc # 2018-23521

## Submitter Information

**Name:** Scott Degenhardt

**Address:** United States,

**Email:** Scott.Degenhardt@alegent.org

## General Comment

The U.S. Nuclear Regulatory Commission (NRC) is seeking feedback on a proposal to allow physicians to become "limited authorized users" for administering certain therapeutic and radiopharmaceuticals. During the most recent Dec 11th 2018 call, the NRC stated they are open to all proposals that would address the current and future Authorized User (AU) needs, including proposals for qualified non-physicians becoming limited authorized users. Nuclear Medicine Advanced Associates (NMAA) are credentialed, mid-level providers in Nuclear Medicine and have the ability to address the future Authorized User needs.

Nearly every specialty in healthcare has embraced credentialed mid-level providers. Physician assistant, nurse practitioner, nurse anesthetist, among other mid-level professions are thriving and improving efficiency and overall patient care in their respected fields. A Nuclear Medicine Advanced Associate is a credentialed, board certified, mid-level provider in Nuclear Medicine. The NMAA works under the supervision of a licensed physician who is also an authorized user of radioactive materials, to enhance patient care in the diagnostic imaging and radiotherapy environments.

The NMAA program is a masters level graduate program that follows a model similar to a nuclear medicine residency. It encompasses a nationally recognized NMAA curriculum and clinical preceptorship directed by a nuclear medicine physician or radiologist. Upon completion of the program, the NMAA meets training and educational requirements for AU as defined by the NRC. Curriculum includes extensive training in basic radionuclide handling techniques applicable to materials requiring a written directive and work experience under the supervision of an AU in calculating, ordering, and administering radioactive materials requiring a written directive. The NMAA also receives specific training performing patient-centered visits relevant to their nuclear medicine procedure or therapy.

The NMAA program is unique in that didactic hours can be obtained through online courses while clinical hours are done on site with a physician preceptor. This type of model has the ability to address the current and future Authorized User needs throughout the country.

The NMAA would be unique among Authorized Users in that they could provide services of AU, Technologist, and Radiation Safety officer. This would greatly improve efficiency and reduce costs.

In closing, the NMAA profession and their respective mid-level providers are the ideal fit to address the future Authorized User needs. As stated earlier, the NMAA curriculum is modeled after a Nuclear Residency program and meets the training and education requirements to become an AU set forth by the NRC.

Respectfully,  
Scott Degenhardt, MIS, NMAA

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## **Attachments**

NMAA AU proposal to NRC

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