

# PUBLIC SUBMISSION

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Training and Experience Requirements for Different Categories of Radiopharmaceuticals

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

Training and Experience Requirements for Different Categories of Radiopharmaceuticals

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## General Comment

I am providing a comment regarding the current discussion on potentially reducing the training and experience requirements for radionuclide therapy. I am fully in agreement with the recent editorial that was published in the Journal of Nuclear Medicine authored by my colleagues from UCLA (Razmaria A, Calais J, Czernin J. Delivering Radionuclide Therapies Requires Extensive Training and Competence: Send a Firm Message to the NRC and Your Representatives. J Nucl Med 2019; 60:1-2). In this editorial, the authors present sufficient data and evidence against some of the underlying erroneous assumptions that have been made to propose the need for reducing the training requirement both in duration and scope. It also discusses appropriately why in fact extensive training is needed for safe and effective delivery of targeted radionuclide therapies to patients. As an academic nuclear medicine physician with extensive training and experience in the field and the past president of both the American College of Nuclear Medicine (ACNM) and the Society of Nuclear Medicine and Molecular Imaging (SNMMI), I am fully supportive of the Razmaria et al's editorial and feel that reducing the relevant training requirements will lead to unsafe clinical practice and harm to patients and society. Please note that I am writing this note in personal capacity and am not representing the views of any other entity that I am currently or have previously been affiliated with. Thank you for considering my comment.

Hossein Jadvar, MD, PhD, MPH, MBA