



# **Comments on Training and Experience Requirements for All Modalities**

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# ACMUI Standing Subcommittee on Training & Experience (T&E)

- Established in 2016
- Charge
  - Periodically review T&E requirements currently in effect for all modalities
  - Make recommendations for changes as needed

# ACMUI Standing Subcommittee on Training & Experience

- Review T&E requirements currently in effect for uses of
  - Unsealed byproduct materials  
(10 CFR 35.100, 35.200, 35.300, & 35.1000)
  - Sealed byproduct materials  
(10 CFR 35.400, 35.500, 35.600, & 35.1000)

# Issues to be Addressed by the Subcommittee

- Periodic review
  - T & E requirements
  - Competency
  - Patient access

# Periodic Review

- What is a reasonable time interval between reviews?
  - 15 years: Too long
  - 1 year: Impractical
  - 5 years: Reasonable/practical
    - More frequently if needed
      - New procedure
      - Increase in ME's or RSE's
      - Other

# Review Template for T&E Requirements

T & E Requirements for.....

## – **Classification**

- Appropriate
- Inappropriate
- Obsolete

## – **Evaluation**

- Medical Events
- Radiation Safety Events
- Patient access

# T & E Requirements Evaluation: Medical & Radiation Safety Events

- Number & Trends
  - Explanation
    - Procedure
    - Competency

# Competency

- General Definition:
  - Ability to do something, especially measured against a standard
- Medical Definition
  - Principle of professional practice, identifying the ability of a provider to consistently administer safe, reliable care



# Determining Competency

- Majority of individuals
  - Deemed status of various certifying boards (ABNM, ABR, etc.)
- Potential Alternative Pathways
  - Didactics (with examination) and “hands-on” experience with preceptor certification
  - Practical examination (independent examining committee)

# Patient Access

- Do current/proposed regulations limit patient access to procedures?
- Do current/proposed regulations provide adequate protection from unintended radiation exposure?
- Accessible/reasonable pathways for obtaining AU status

# Review Template Example

10 CFR 35.190 Training for uptake, dilution, and excretion studies.

## **Evaluation**

ME's: None reported over 10 yrs.

RSE's: Not available

Patient access: No known issues

## **Classification**

Appropriate

# Stakeholder Input

- Informal
  - Faster
  - Potential for bias
- Formal
  - Slower
  - Broader respondent base

# Acronyms

- ACMUI – Advisory Committee on the Medical Uses of Isotopes
- ABNM – American Board of Nuclear Medicine
- ABR – American Board of Radiology
- AU – Authorized User
- T&E – Training and Experience