



Conference of Radiation Control Program Directors, Inc.

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March 15, 2000

Charles Mowll, Executive Vice President
 Business Development & External Affairs
 Joint Commission on Accreditation of Healthcare Organizations
 One Renaissance Boulevard
 Oakbrook Terrace, Illinois 60181

Dear Mr. Mowll:

The Conference of Radiation Control Program Directors (CRCPD) is a nonprofit professional organization made up primarily of the Directors of state radiation control programs of 49 of the states and the District of Columbia, and their staff. These individuals regulate and control the use of radiation in their jurisdictions and are on the front line in ensuring that the patient, radiation worker and public are protected from unnecessary exposure from a variety of ionizing radiation sources. The CRCPD was founded in 1968. Since its inception, the CRCPD has worked to foster uniformity of radiation control laws and regulations among the states and with federal agencies.

It has come to our attention that the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) has entered into an agreement with the American College of Radiology (ACR) Mammography Program. We are in full support of your Cooperative Accreditation Initiative, and feel that it should be expanded through an agreement with the Food and Drug Administration (FDA) to include all of the states that accredit or certify mammography facilities. Several of our member states, Arkansas, California, Iowa and Texas, are also approved by the FDA as accrediting bodies. Each of these FDA approved accreditation bodies equally meets the requirements of 21 CFR 900, Subpart A. Additionally, the states of Illinois and Iowa are participating in the mammography certification pilot program with the FDA. It is anticipated that other states will pursue FDA approval as a certifying body in the future. The CRCPD is proud of the initiative that these states have taken on behalf of the public and mammography providers to ensure that all mammography facilities meet uniform standards nationwide.

We not only encourage you in your efforts to pursue a cooperative agreement with the FDA, but also strongly recommend this action. A cooperative agreement to recognize all current and future FDA-approved accreditation and certification programs would benefit the states and their mammography providers. Additionally, and equally important, the agreement would also benefit the JCAHO by helping it to remain relevant in a changing regulatory environment.

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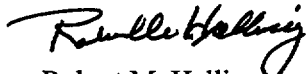
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As an association of state radiation regulatory authorities, we are eager for the JCAHO to recognize and support the quality accreditation and certification programs that the states provide. If the CRCPD can in any way facilitate such an agreement, please contact me at 617/727-6214. We may be in a unique position to assist you in the resolution of this matter.

Thank you for your attention to this issue.

Sincerely,



Robert M. Hallisey
Chairman of the Board of Directors
Conference of Radiation Control Program Directors, Inc.

RMH/JS/CC/ss

CC: Board of Directors/Federal Liaisons
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