



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 16, 2015

The American Board of Radiology
ATTN: Valerie P. Jackson, MD
Executive Director
5441 E. Williams Circle
Tucson, AZ 85711-7412

Dear Dr. Jackson:

I am writing in response to your August 1, 2014, letter (Agencywide Document Access and Management System Accession Number ML14304A514) responding to my letter of July 2, 2014 (ML14171A357) requesting clarification with regard to extension of U.S. Nuclear Regulatory Commission's (NRC's) recognition period for the American Board of Radiology's (ABR) certificates in Diagnostic Radiology, Radiation Oncology, Diagnostic Medical Physics, Nuclear Medical Physics, and Therapeutic Medical Physics.

The NRC staff contacted the American Board of Medical Specialties (ABMS) to verify that your terminology, especially the contradictory use of "certified, not meeting maintenance of certification (MOC) requirements," is terminology specified by ABMS for tracking purposes. The staff was informed that the individual specialty boards develop their own terminology and the ABMS accepts what the board provides. The staff continues to have concerns about the ABR's use of the phrase "not meeting MOC requirements" to let Diplomats know that, while they are still certified, they are falling behind on earning hours/credits needed to meet future MOC goals. The certificate itself states "Ongoing certification is contingent upon meeting the requirements of Maintenance of Certification," and using the phrases "certified" and "not meeting MOC requirements" together appears contradictory. ABR's continued use of such phrases when stating the certification status of an individual could cause confusion on the status of your Diplomats and may result in delayed recognition of qualified individuals by regulators and the public.

The NRC staff reviewed the information describing the Board's website that provides look-up access to information concerning the validity of a Diplomat's certificate after its 2012 issuance date. The staff understands that the look-up site is available to anyone, including NRC and the Agreement States, and that the ABR annually reviews and updates the Diplomats status in March with respect to compliance with the Lifelong Learning and Self-assessment, Cognitive Expertise, and Practice Quality Improvements elements. The ABMS will notify ABR on a daily basis of a Diplomat's licensure issue, so that the ABR can revoke a Diplomat's certification.

Therefore, on a yearly basis there is an evaluation of whether the Diplomat remains in good standing (i.e. continues to be certified because he/she either meets the MOC requirements or has the warning note "not meeting MOC requirements") or is no longer considered certified because he/she did not get enough hours/credits to meet the MOC requirements in the specified time period (i.e., "certificate lapsed"). The staff further understands that no changes were made to the actual ABR physician and physicist certification processes and certificates that NRC currently recognizes.

Based on this information, the NRC will only recognize the post-2012 ABR Diagnostic Radiology, Radiation Oncology, Diagnostic Medical Physics, Nuclear Medical Physics, and Therapeutic Medical Physics certificates with the appropriate “AU Eligible,” RSO Eligible,” or “AMP eligible” designation above the ABR seal if:

- (1) The certificate was issued in the last 4 years, or
- (2) The certificate was issued more than 4 years ago and the Diplomat is identified in the ABR look-up site as meeting the requirements of “Maintenance of Certification” by the statement:
 - a. “certified, meeting MOC requirements,” or
 - b. “certified, not meeting MOC requirements.”

Accordingly, a link to the ABR website and look-up information will be added to the 2012 information for the two ABR physician and three physicist board certificates in each ABR recognition on NRC’s website for 10 CFR Part 35 matters, at http://www.nrc.gov/materials/miau/med_use_toolkit.html.

Please notify the NRC, via letter, six months in advance of ABR plans for becoming inactive or disbanding, plans to inactivate or disband any of your ABR physicist or physician certification programs, as well as of changes to certification procedures and certification documents that would affect the recognition of ABR’s medical physics and physician certification processes under the requirements of 10 CFR 35.50(a), 35.51(a), 35.290 (a), 35.390(a), 35.392(a), 35.394(a), 35.490(a), or 35.690(a).

For further information or for questions, please contact Donna-Beth Howe, Ph.D. of my staff at (301) 415-7848 or via e-mail: Donna-Beth.Howe@nrc.gov.

Sincerely,

/RA/
CEinberg for LDudes

Laura A. Dudes, Director
Division of Material Safety, State, Tribal
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

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Sincerely,

Laura A. Dudes, Director
 Division of Material Safety, State, Tribal
 and Rulemaking Programs
 Office of Nuclear Material Safety
 and Safeguards

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OFC	MSEAB	MSEAB	MSEAB:BC	NMSS:MSTR:D
NAME	DBHowe	Via e-mail MFuller	DBollock	LDudes
DATE	10/07/2014	11/24/2014	11/25/2014	01/16/2015

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