

June 21, 2016

Director  
Regulations Management (02REG)  
Department of Veterans Affairs  
810 Vermont Avenue, NW., Room 1068  
Washington, DC  
20420

re: RIN 2900–AP44 VA Advanced Practice Nurses Proposed Rule

Dear Sir:

The American Association of Physicists in Medicine<sup>1</sup> (AAPM) salutes our veterans for their service to the United States of America, and we believe that our veterans deserve high quality medical care at the Department of Veterans Affairs' (VA) hospital system. The VA proposal ([81 FR 33155](#)) to allow advanced practice registered nurses to both perform medical imaging procedures and interpret the medical images from those procedures is contrary to high quality medical care; indeed, this proposal borders on malpractice. Radiologic technologists have extensive training in radiographic positioning which allows them to optimally position the anatomy of interest on a given radiographic series. The art of anatomical positioning has been developed by radiologic technologists working with radiologists in over a century of clinical optimization. Radiologic technologists also have an understanding of the protection requirements associated with ionizing radiation. This includes (in concert with the medical physicist and radiologist) the ability to optimize image acquisition such that the best exam is achieved with the lowest radiation dose to the patient.

Radiologists are physicians who after 4 years of medical school, typically undergo 1 year of training as an intern, 4 years of training as a radiologist, and 1 year of subsequent training in a radiology sub-specialty. Radiologists have exceptional ability to identify subtle findings on medical images and provide expert interpretation, in the context of a patient's clinical presentation. While the advanced practice registered nurse is a medical practitioner with essential skills which benefit the patient, to believe that they could also learn the interpretive skills of a board certified diagnostic radiologist is unrealistic.

---

<sup>1</sup> The American Association of Physicists in Medicine (AAPM) is the premier organization in medical physics, a broadly based scientific and professional discipline encompassing physics principles and applications in biology and medicine whose mission is to advance the science, education and professional practice of medical physics. Medical physicists contribute to the effectiveness of radiological imaging procedures by assuring radiation safety and helping to develop improved imaging techniques (e.g., mammography CT, MR, ultrasound). They contribute to development of therapeutic techniques (e.g., prostate implants, stereotactic radiosurgery), collaborate with radiation oncologists to design treatment plans, and monitor equipment and procedures to insure that cancer patients receive the prescribed dose of radiation to the correct location. Medical physicists are responsible for ensuring that imaging and therapy facilities meet the rules and regulations of the U.S. Nuclear Regulatory Commission (NRC) and various State regulatory agencies. AAPM represents over 8,400 medical physicists.

The AAPM represents diagnostic medical physicists who work side-by-side with both radiologic technologists and radiologists; medical physicists are involved in training both groups, and in optimizing protocols which impact both the acquisition and interpretation of medical imaging. Medical physicists have no financial stake in the VA proposal, and this commentary represents our significant experience working in the diagnostic radiology environment and our commitment to patient safety. Based upon the experience of medical physicists, there is absolutely no possibility that our respected advanced practice registered nurse colleagues, who lack the experience of radiologic technologists for acquisition and radiologists for interpretation of medical images, could deliver accurate radiologic diagnostic images and interpretation. Allowing this proposal to go forward would produce substandard care and be an egregious disservice to veterans who have honorably served our nation.

If you have any questions, please contact Lynne Fairbent, Senior Manager of Government Relations at [lynne@aapm.org](mailto:lynne@aapm.org) or 571-298-1264.

Sincerely,

A handwritten signature in blue ink, appearing to read "John M. Boone". The signature is fluid and cursive, with a long horizontal line extending to the left from the start of the name.

John M. Boone, FAAPM, FACR