

Advocacy Update

August 24, 2026

OMB Federal Grantmaking Rule

Before the August recess, the Senate passed a continuing resolution extending federal funding through December 11 that would temporarily block implementation of OMB's proposed federal grantmaking rule. The House is expected to consider the measure when it returns from recess.

AAPM previously submitted comments opposing key provisions of the proposal. The Senate action is a positive development, but it would delay implementation rather than resolve AAPM's underlying concerns with the rule.

NRC Radiation Protection and Patient Release

As of August 24, AAPM's comments on the NRC radiation-protection framework are in late-stage drafting following multiple subject-matter expert calls and rounds of technical review. Additional language from AAPM's NRC SMEs and the Nuclear Medicine Subcommittee was incorporated through August 21, and the draft is being finalized ahead of the NRC comment deadline.

Internally, the draft has been circulated to AAPM's core NRC subject-matter experts, GRAC-Policy, the Radiation Protection Subcommittee (RPSC), the Nuclear Medicine Subcommittee (NMSC), and CHAMPSC. Externally, AAPM has shared the work-in-progress draft with ASTRO, ASRT, CRCPD, and others to compare approaches and identify areas of alignment before submission. The final draft will be shared with Executive Committee for review and approval.

AAPM also participated in the August 17 Advisory Committee on the Medical Uses of Isotopes (ACMUI) meeting and is separately reviewing Draft Regulatory Guide DG-8070, the proposed Revision 2 to Regulatory Guide 8.39, Release of Patients Administered Radioactive Material. The patient-release guidance review is proceeding alongside the broader Part 20 rulemaking work.

Current AAPM positions on key Radiation Protection Framework issues

Issue	AAPM position
Graded dose-management framework	Support, provided the revised framework preserves effective radiation-safety practices and does not make voluntary institutional precautions universally enforceable.
Alternative dosimetry methods	Support with clear documentation, validation, and safeguards for cumulative occupational dose histories.
Planned occupational dose extensions	Support only for rare, justified circumstances; not as a routine staffing, throughput, scheduling, or shielding workaround.
2 mrem/hour public-dose limit	Support deletion of the hourly limit if the annual public-dose limit and other applicable controls remain in place.
Caregiver and patient-release pathway	Support a formal caregiver pathway with informed, voluntary consent and clearer implementation rules for patient release.
Agreement State compatibility	Recommend substantive Part 35 patient-release provisions be Compatibility Category A, and no less than Category B, to reduce state-to-state variation.
Quantitative occupational monitoring	Oppose allowing required monitoring results to be reduced to a notation; the actual numerical dose result should be retained.

NRC Medical-Use Licensing

AAPM has begun substantive review of the NRC's proposed Reducing Barriers to Medical Use Licensing rule under 10 CFR Part 35. NRC held a public webinar on August 20 to walk stakeholders through the proposal, and AAPM participated in the session and developed a summary and comment-input framework to support internal review.

AAPM subject-matter experts are evaluating proposed changes affecting training and experience requirements, authorized-user pathways, written directives, medical-event reporting, decay-in-storage, research licensing, and other medical-use provisions.

NIH RPG Cap RFI

AAPM submitted a response in early August to NIH RFI NOT-OD-26-086, which proposed capping the number of simultaneous Research Project Grants held by a principal investigator. AAPM raised concerns about potential effects on collaborative science, multi-PI research, continuity of established research programs, and investigators whose work depends on multiple complementary awards.

NIH Scientific Impact RFI

AAPM submitted comments on August 19 in response to NIH's RFI on Measuring and Rewarding Scientific Impact (NOT-OD-26-087). The response addressed NIH's consideration of new approaches for evaluating scientific impact and underwent scientific leadership and ExCom review before submission.

NIST Advocacy

AAPM continued expanding advocacy around the National Institute of Standards and Technology and its Radiation Physics Division. Staff, Science Council representatives, and Capitol Associates developed updated talking points and a congressional one-pager connecting NIST measurement standards and calibration services to radiation therapy, mammography, nuclear medicine, radiopharmaceutical therapy, radiation safety, and other areas of patient care.

The advocacy materials also incorporate findings from the National Academies' assessment of NIST's Physical Measurement Laboratory, including staffing shortages, aging infrastructure, and vulnerabilities in calibration-service continuity. Capitol Associates continued targeted congressional outreach on NIST.

VA Legislation

AAPM continued advocacy on H.R. 3489, legislation addressing VA hiring of medical physicists. AAPM and Capitol Associates held congressional outreach with Rep. Juan Ciscomani's office on August 20 regarding the legislation.

NIBIB / Friends of NIBIB

AAPM participated in the August 21 FoNIBIB-NIBIB Congressional Expo & Tour at the NIH campus, which provided an opportunity for congressional stakeholders and member organizations to engage directly with NIBIB-supported research and technologies.

Later that day, AAPM participated in the Friends of NIBIB leadership meeting with NIBIB Director Bruce Tromberg and senior Institute leadership. Discussion focused on federal research funding disruptions, NIH's Unified Funding Strategy, peer review, workforce and training challenges, and the proposed OMB grants rule. NIBIB leadership also emphasized the value of concrete patient stories and real-world examples demonstrating how federally supported enabling technologies improve health outcomes and strengthen congressional outreach.

Immigration

AAPM participated in an AIP-hosted August 12 webinar examining DHS duration-of-status changes affecting international students, researchers, and exchange visitors. AAPM continues monitoring implications for the scientific and medical workforce.

AAPM is also monitoring a developing DHS/ICE proposal that could impose substantial new fees related to Optional Practical Training (OPT). The proposal remains under review at OMB's Office of Information and Regulatory Affairs, and the rule text and final fee structure have not yet been released.