

Advocacy Update

September 2026

NRC Radiation Protection and Medical Use Licensing

AAPM submitted three NRC comment letters covering radiation protection, medical-use licensing, and patient release. All three underwent subject-matter expert and ExCom review before filing.

- **[Radiation Protection Framework \(10 CFR Part 20\)](#)**: Submitted August 31 following several weeks of technical review and coordination with AAPM subject-matter experts, GRAC-Policy, the Radiation Protection Subcommittee, the Nuclear Medicine Subcommittee, CHAMPSC, and external stakeholders. The American Physical Society (APS) co-signed the final letter. ASTRO submitted a separate letter supporting AAPM's position and attached AAPM's comments to its submission.
- **[Reducing Barriers to Medical Use Licensing \(10 CFR Part 35\)](#)**: Submitted September 10. The comments addressed training and experience requirements, authorized-user pathways, written directives, medical-event reporting, decay-in-storage, research licensing, and other medical-use provisions.
- **[Patient Release Guidance \(DG-8070\)](#)**: Submitted September 10 on the proposed revision to NRC guidance governing release of patients administered radioactive material. ASTRO's comments explicitly supported AAPM's recommendations and attached AAPM's letter.

Organization of Agreement States Annual Meeting

AAPM participated in the [2026 Organization of Agreement States \(OAS\) Annual Meeting](#). Matt Wait represented AAPM with a presentation, "The Role of Medical Physicists in the Regulatory and Safety Inspection Process," highlighting AAPM Medical Physics Practice Guidelines, the State Champions program, and AAPM's regulatory engagement. The presentation was well received, and OAS leadership expressed interest in continued collaboration with AAPM.

AAPM staff and CHAMPS representatives distributed AAPM/CHAMPS one-pagers and used the meeting to build relationships with state radiation-control officials.

NIST Radiation Physics Advocacy

AAPM expanded its advocacy on the NIST Radiation Physics Division in September. Staff, Capitol Associates, Science Council representatives, and AAPM subject-matter experts continued developing congressional materials explaining how NIST standards and calibration services support radiation therapy, diagnostic imaging, nuclear medicine, radiopharmaceutical therapy, and radiation safety.

AAPM and Capitol Associates held the following congressional meetings on NIST:

- **Sen. Chris Van Hollen, Ranking Member, Senate Appropriations CJS Subcommittee**: AAPM met with health staffer Brendan Flynn, who was familiar with the issue and had recently visited NIST. He encouraged AAPM to broaden its messaging on the uses of NIST funding, requested additional examples of how funding constraints affect personnel and equipment, and expressed interest in continued engagement.
- **Rep. Grace Meng, Ranking Member, House Appropriations CJS Subcommittee**: AAPM met with health staffer Ella Doyle and provided background on the Radiation Physics Division and AAPM's

NIST one-pager. At her request, Capitol Associates followed up with information on the American Innovation Act. Doyle also requested examples of how reduced resources have affected NIST personnel, equipment, and national standards.

- **Rep. Mark Alford, Member, House Appropriations CJS Subcommittee:** AAPM met with health staffer Anica Choi to discuss the Radiation Physics Division's role in maintaining measurement standards important to patient safety. Choi asked to stay in contact on future opportunities and shared information on the office's appropriations-request process.
- **Rep. Hal Rogers, Chair, House Appropriations CJS Subcommittee:** AAPM met with Legislative Assistant Will Reynolds. The discussion emphasized patient-safety implications and the scale of clinical care that relies on NIST-traceable measurement standards. Reynolds asked about broader stakeholder support and encouraged AAPM to submit a formal appropriations request when the office's process opens.
- **Sen. Dave McCormick virtual town hall:** AAPM members participated in a virtual town hall with Sen. McCormick organized by APS. Justin Napolitano (UPMC), who worked with AAPM staff on talking points, represented the medical physics community and connected NIST radiation measurement and calibration programs to patient care. AAPM President-Elect Andrew Maidment followed up with the Senator's office the same day, asking the Senator to urge the Senate CJS Subcommittee to fund NIST's laboratories at no less than current levels and to include report language preserving NIST's radiation dosimetry and calibration programs.

[NIST-NIBIB Symposium on Medical Metrology and Standards](#)

AAPM had a strong presence at the September 24 [NIST-NIBIB Symposium on Medical Metrology and Standards for American Healthcare and Commerce](#). The symposium brought together clinical, industry, government, and research stakeholders to identify priority measurement and consensus-standard needs for U.S. healthcare and to inform a national Medical Metrology and Standards Roadmap. NIST also featured work on evolving dosimetry standards, quantitative MRI, optical imaging measurements, and other emerging needs. AAPM members participated throughout the program:

- **Maryellen Giger:** Contributions of metrology and standards from the clinical perspective.
- **John Boone:** Lessons learned and future needs for CT metrology.
- **Paul Kinahan:** Implementation roadmaps for translating quantitative imaging biomarkers into clinical practice.
- **Kishore Rajendran:** Perspectives from AAPM's Working Group on the Physics of Quantitative Imaging.

NIST and NIBIB are following the symposium with a [Request for Information](#) on future medical metrology and standards needs for imaging devices, diagnostics, and therapy; written comments are due November 30. AAPM's NIST subject-matter experts, led by Jean Moran, are coordinating AAPM input, with symposium speakers serving as key technical resources. NIST also plans to develop a medical metrology and standards white paper and roadmap from the symposium and RFI, and Paul Kinahan noted that AAPM is expected to remain involved in that work over the coming year.

[Senate Bipartisan Science and Innovation Caucus](#)

On September 14, AAPM staff attended the Capitol Hill launch of the new [U.S. Senate Bipartisan Science and Innovation Caucus](#), co-chaired by Sens. Dave McCormick and John Hickenlooper. The caucus provides a forum for Congress, researchers, and the innovation community on federal science and STEM

policy, and offers AAPM another avenue to engage on federal research investment, scientific infrastructure, and NIST.

Research!America National Health Research Forum

AAPM staff attended [Research!America's 2026 National Health Research Forum](#) in Washington, DC. The program included remarks from NIH Principal Deputy Director Matthew Memoli and ARPA-H Director Alicia Jackson, the debut of Research!America's report on U.S. investment in medical and health R&D from 2021 to 2025, and a panel on safeguarding U.S. leadership in global R&D and clinical innovation. The forum provided an opportunity to engage with the broader health research advocacy community on federal research funding.

NIH Grant Review and Political Oversight

Senior White House officials reportedly discussed an executive order that would create an external review panel with authority to reject NIH grants after the agency's scientific review process. The White House disputed reporting about unannounced policy decisions, and NIH declined substantive comment.

The proposal drew congressional pushback. Senate Appropriations Committee Chair [Susan Collins](#) warned the Administration not to add a political review layer, noting that the recently enacted continuing resolution blocks OMB's proposed grantmaking rule or any substantially similar policy. By September 23, [reports indicated the executive-order plan had been shelved](#), although lawmakers continued pressing the Administration to abandon any similar effort. AAPM will continue monitoring developments affecting NIH peer review and grantmaking.

H-1B Visa Policy

AAPM reviewed DHS's proposed additional [\\$103,265 fee](#) for certain cap-subject H-1B petitions in the context of its prior advocacy on high-skilled immigration and the scientific and medical workforce.

- **Joint comment letter:** AAPM signed a multi-sector joint comment letter coordinated by the Institute for Progress opposing the proposed fee. The final letter included 49 organizations and was filed with USCIS on September 24. It raised concerns about the effects on hospitals, academic medical centers, universities, research institutions, and other employers that rely on highly skilled international workers.
- **Proclamation and executive order:** On September 18, the White House issued a proclamation reinstating a \$100,000 payment requirement for certain H-1B petitions involving beneficiaries outside the United States. AAPM is monitoring the implementation and legal status of the proclamation, as well as Executive Order 14431, which directs greater interagency coordination and scrutiny in H-1B adjudication.
- **60-day grace period:** AAPM is tracking a proposal to eliminate the 60-day grace period for nonimmigrant professionals after their employment ends. The Institute for Progress is organizing a second joint comment letter, with a November 10 sign-on deadline.

State Advocacy and CHAMPS

AAPM and Capitol Associates continued implementing the expanded state legislative and regulatory tracking process. CHAMPSC and CHAMPWG review recurring state legislative and regulatory reports, with State Champions serving as local resources for determining whether tracked proposals may affect

medical physics practice. The OAS meeting advanced this work by creating direct connections between AAPM, State Champions, and state radiation-control officials.

- **Arizona:** Capitol Associates flagged SB 1121, and AAPM coordinated with CHAMPSC leadership to alert Arizona State Champions and ask them to monitor implementation and report any local issues.
- **Michigan:** State Champions identified language in Michigan’s developing Part 5 rules, which would for the first time set qualifications for who may operate X-ray and fluoroscopy equipment. The draft would define nurse practitioners as “licensed practitioners,” exempting them from training and experience requirements across diagnostic radiography, fluoroscopy, CT, mammography, and related modalities. Ralph Lieto and Lana Critchfield are coordinating with the Michigan Radiological Society, ACR, and ASTRO’s Michigan State Captain ahead of the October 20 public hearing in Lansing. A decision on formal AAPM comments is deferred pending coalition-building with physician and radiologic technologist groups, whose practice is most directly affected.
- **Wisconsin:** Wisconsin is revising its radiation protection rules, including new fluoroscopy operator requirements in DHS 157. CHAMPS leadership is engaging the Wisconsin State Champion to assess whether the language could create friction for medical physicists in commissioning, QA, or safety oversight, and whether a brief comment asking DHS to confirm it does not restrict medical physicist involvement is warranted. The hearing was held September 25; comments are due October 2.

Source Security Working Group

AAPM continued participating in the Source Security Working Group (SSWG) on federal policy affecting the availability and security of medical-use radioactive sources.

- **Senate Foreign Relations Committee:** AAPM joined an SSWG meeting with committee staff on the sanctions legislation and its potential implications for medical-use radioactive sources, including cobalt-60 used in Gamma Knife treatment. AAPM prepared cobalt-60 talking points for the meeting with input from AAPM subject-matter experts.
- **House meetings:** AAPM joined SSWG meetings with Will Stiers, Legislative Director for Rep. Mike Rogers, and Peter Spencer, Senior Professional Staff Member for the House Energy and Commerce Committee majority.
- **Coalition letter:** AAPM signed the SSWG coalition letter on the Graham Russia sanctions legislation, which was sent to the House Rules Committee and relevant House stakeholders on September 14.

ACR PRIMED-AI Support Letter

AAPM provided a letter of support for the American College of Radiology’s application to serve as the Logistics Center for the [NIH Common Fund’s PRIMED-AI program](#).