AAPM Advocacy Update

October 26, 2026

Congressional Landscape

Congress is currently in recess ahead of the November 3 midterm elections and is scheduled to return on November 9 for its lame-duck session. The continuing resolution funds federal agencies, including NIST and NIH, at FY2026 levels through December 11, making FY2027 appropriations a major issue when lawmakers return. The House Appropriations Committee has advanced all 12 of its FY2027 bills, but the Senate Appropriations Committee is not expected to act before the lame duck.

When Congress returns, it can enact some or all of the 12 FY2027 bills, pass another continuing resolution into 2027, or pass a full-year continuing resolution; a lapse in funding is also possible. The lame-duck agenda is crowded, including the FY2027 National Defense Authorization Act and health care and other authorizations that expire December 31. The Section 157 block on OMB's Uniform Guidance rule expires with the continuing resolution unless Congress extends it.

All 435 House seats and 35 Senate seats are on the November 3 ballot. Most published forecasts expect the House majority to change, while control of the Senate is considered closer. The results will shape the lame duck: lawmakers may choose to finish FY2027 bills before the new Congress convenes, or defer them to January, when new majorities and committee leaders take over.

Congressional Advocacy: NIST Funding and VA Medical Physicist Pay Cap Relief Act

On October 14, AAPM Executive Committee members met congressional offices to advocate for two priorities: protecting funding for the National Institute of Standards and Technology (NIST), particularly its Radiation Physics Division (RPD), and securing cosponsors for the VA Medical Physicist Pay Cap Relief Act (H.R. 3489/S. 3771). The meetings also provided an opportunity to explain the role of medical physicists in patient safety, cancer care, and veterans' health. The offices and their members' key committee assignments were:

- **Sen. Chris Van Hollen (D-MD):** Ranking Member of the Appropriations Subcommittee on Commerce, Justice, Science, and Related Agencies, which funds NIST.
- **Sen. Ted Cruz (R-TX):** Chairman of the Commerce, Science, and Transportation Committee, which authorizes NIST.
- **Sen. John Fetterman (D-PA):** Member of the Commerce, Science, and Transportation Committee, which authorizes NIST.
- **Sen. Dave McCormick (R-PA):** Co-founder of the Senate Science and Innovation Caucus. The meeting followed up on Sen. McCormick's September 24 call, where AAPM member Justin Napolitano briefed him on the NIST Radiation Physics Division funding issue.
- **Sen. Alex Padilla (D-CA):** Serves on the Senate Budget Committee.
- **Rep. Adam Smith (D-WA):** Ranking Member of the House Armed Services Committee.
- **Sen. Patty Murray (D-WA):** Vice Chair of the Appropriations Committee. She also serves on the Health, Education, Labor, and Pensions and Veterans' Affairs Committees.

On NIST, AAPM asked Congress to restore funding for NIST's Scientific and Technical Research and Services (STRS) laboratory programs to the FY2025 enacted level of $857.2 million and to ensure that funding supports RPD. That funding fell to $843.9 million in FY2026. The House FY2027 bill (H.R. 8845) would provide about $725 million, a further $119 million cut from FY2026 and about $132 million below AAPM's request. The Senate has not yet released its FY2027 bill.

On the VA legislation, AAPM urged congressional offices to cosponsor H.R. 3489/S. 3771. H.R. 3489 currently has six bipartisan cosponsors, and S. 3771, introduced by Sen. Tim Kaine, has two: Sens. John Boozman and Jim Banks.

Members can contact their legislators through the AAPM NIST Action Alert and the VA Medical Physicist Pay Cap Relief Act Action Alert. To date, 17 AAPM members have contacted their members of Congress through the AAPM Action Center, reaching 44 legislators.

NIST-NIBIB Medical Metrology and Standards RFI

Following the September 24 NIST-NIBIB symposium, AAPM assembled a multidisciplinary writing group to respond to NIST's request for information on future medical metrology and standards needs. The response will help inform priorities for medical imaging, devices, diagnostics, and therapy.

Topics being developed include reference standards for radiopharmaceutical therapies, proton and particle therapy, FLASH/ultra-high-dose-rate dosimetry, small-field and MR-guided radiation therapy, quantitative imaging, AI/ML validation, adaptive treatment verification, and quantitative biomarkers. AAPM will also explain the importance of preserving the NIST-to-ADCL-to-clinic calibration and traceability chain and avoiding delays in standards development as new modalities enter clinical use.

NIH Peer Review and Research Policy

On October 13, AAPM submitted comments opposing NIH's proposal to replace detailed peer-review scores and percentile rankings with broad competitiveness categories. AAPM warned that eliminating this information could disadvantage medical physics and other interdisciplinary research fields by making it harder to compare applications across review panels. The changes could also make it more difficult for researchers, particularly early-career investigators, to assess their funding prospects and determine whether to revise and resubmit applications. AAPM urged NIH to retain scores and percentiles alongside the proposed categories, explain how applications would be compared across review panels, and evaluate the impact of any changes on smaller research fields.

FDA Generative AI-Enabled Medical Devices

On October 19, AAPM submitted comments to FDA on considerations for regulating generative AI-enabled medical devices, an early-input discussion paper on how these devices should be regulated across their lifecycle. AAPM urged FDA to require an explicit evidence chain from manufacturer validation through site-specific acceptance testing and commissioning, postmarket surveillance, and controlled updates, building on the quality assurance model medical physicists already use. AAPM also called for physics-based, task-specific validation rather than reliance on benchmark scores, and for human oversight that is demonstrated rather than assumed.

NIH FY2027 Research Appropriations

AAPM joined the Ad Hoc Group for Medical Research coalition letter supporting FY2027 NIH appropriations, which was submitted October 20. This effort complements AAPM's independent regulatory submissions and its broader work to support predictable federal investment in biomedical research, medical technology, interdisciplinary science, and the research workforce.

Immigration and the Scientific and Clinical Workforce

AIP circulated an October 9 policy primer on an OPT-related fee proposal, and science-sector organizations shared additional potential coalition responses. Earlier feedback from medical physics training programs documented recruitment restrictions, immigration-related delays, and deferred admissions. AAPM is evaluating future advocacy opportunities in coordination with partner organizations.

DHS's proposed rule would charge schools $70,000 for each student's initial OPT recommendation and $30,000 for each subsequent one, including the STEM OPT extension. Comments are due November 9. Members can submit their own comments through the American Physical Society's OPT comment tool, which is open for anyone to use.

State Advocacy and CHAMPS

AAPM and Capitol Associates continued updating the state legislation tracker and state regulation tracker, and coordinating review through CHAMPSC, the CHAMPS working group, and State Champs. October developments included:

- **Michigan:** CHAMPS Vice Chair Lana Critchfield and CHAMP Ralph Lieto developed comments, aligned with those of the Michigan Radiological Society, ahead of the October 20 public hearing in Lansing on Michigan's proposed Part 5 operator-qualification rules for radiation machines, including implications for fluoroscopy and diagnostic imaging. AAPM also coordinated with ASTRO to share information on the proposed revisions and explore opportunities for collaboration.
- **Illinois:** Proposed amendments to 32 Ill. Adm. Code 360 permitting alternative enhanced radiation-protection systems in cardiac catheterization in place of conventional protective aprons reached the second-notice stage. GRAC Chair and Illinois State Champion Sebastien Gros is coordinating with ASTRO and CHAMPSC.

Source Security and Medical Isotope Access

In September, AAPM joined a Source Security Working Group (SSWG) coalition letter on the Graham Russia sanctions legislation, which was signed into law as the Lindsey O. Graham Sanctioning Russia and Iran Act of 2026 on September 18. On October 16, the President issued Executive Order 14436, which waives the Act's new tariffs and nearly all of its sanctions. According to the SSWG, the waiver addresses the coalition's concerns about interruptions to medical isotope and radioactive source supply chains for now and removes the near-term need for OFAC general licenses. The waiver can be revoked at any time, and sanctions under earlier Russia-related executive orders remain in effect. AAPM will continue monitoring through the SSWG.