



April 9, 2014

The Joint Commission
Standards and Survey Methods
Diagnostic Imaging Standards Changes For
Radiologists' Qualifications and Competency Field Review
One Renaissance Blvd.
Oakbrook Terrace, IL 60181

VIA ELECTRONIC SUBMISSION

RE: Diagnostic Imaging Standards Changes for Radiologists' Qualifications and Competency

The American College of Nuclear Medicine is a professional association that directly represents the interests of nuclear medicine physicians before legislative and regulatory bodies, other medical organizations, the media and general public. Our goal is to assure a legislative, legal, regulatory and economic framework that encourages and makes practicable the safe, appropriate use of nuclear medicine procedures to improve the quality of health care service available to patients.

In addition, the Society of Nuclear Medicine and Molecular Imaging (SNMMI) is a nonprofit scientific and professional organization that promotes the science, technology and practical application of nuclear medicine and molecular imaging. SNMMI strives to be a leader in unifying, advancing and optimizing molecular imaging, with the ultimate goal of improving human health. With 18,000 members worldwide, SNMMI represents nuclear and molecular imaging professionals, all of whom are committed to the advancement of the field.

ACNM and SNMMI appreciate the opportunity to comment on the Joint Commission's Proposed Changes for Radiologists' Qualifications and Competency Proposed Imaging Requirements.

Regarding "Radiologists' Qualifications and Competency Proposed Imaging Requirements" HR.02.01.03, EP 39-41, MS.06.01.03, EP10, MS.06.01.05, EP 16, MS.06.01.05, EP 17, MS.06.01.03, EP 10, MS.06.01.05, EP 16, and MS.06.01.05, EP 17, we fully agree with the Joint Commission's intention of ensuring imagers who interpret diagnostic CT imaging are fully and appropriately qualified to do so---as it is in the best interest of the patient.

However, we are unclear why the Joint Commission is participating in the credentialing of imaging personnel as this is a responsibility of the specialty boards (American Board of Nuclear Medicine, American Board of Radiology, etc.). We believe that physician competency determination should continue to be defined by each specialty's board as well as the individual hospital boards and recommendations from the specialty's related societies. We strongly recommend removing language regarding credentialing/licensing types of behavior and suggest that these tasks be reserved for the specific specialty boards.

In addition, we would like to request more background information from the Joint Commission about the following:

1. How were the suggested qualifications and experience determined by TJC?
2. Was the American Board of Nuclear medicine (ABNM) involved in this process/decision? If not, we strongly suggest that ABNM be included in this process before a final decision is made.
3. It does not appear that the any nuclear medicine or radiology specialty societies were included in the development of the proposed standards. We suggest that a representative from ACNM and SNMMI be involved in this discussion.
4. We recommend that the Joint Commission include language that recognizes Nuclear Medicine Physicians who have specific training in PET and combined PET/CT, of which a large proportion

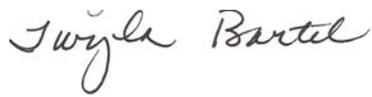
have completed and fulfilled the requirements as outlined by a collaborative working group with Nuclear Medicine representation.

We appreciate your assistance in garnering background information regarding this decision and look forward to your response.

As the nuclear medicine college and society representing a multi-faceted number of imaging professionals, we would like to discuss with the Joint Commission the unique characteristics of nuclear medicine and the importance of appropriately trained personnel to administer these procedures. We also encourage the Joint Commission to allow the specialty boards to continue to develop the competency standards for nuclear medicine physicians. We welcome the opportunity to discuss this further and would be happy to meet with you at a date and time of your choosing.

We would like to thank you again for giving us the opportunity to provide comments to the proposed standards changes.

Sincerely,



Twyla Bartel, DO, MBA, FACNM
ACNM President



Gary L. Dillehay, MD, FACNM, FACR
SNMMI President