



U.S. Department
of Veterans Affairs

NATIONAL STANDARD OF PRACTICE: THERAPEUTIC MEDICAL PHYSICIST

March 2024

PURPOSE: This report provides a summary of internal and external feedback received for the proposed Therapeutic Medical Physicist VA national standard of practice during the comment solicitation period from March to May 2023.

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Executive Summary

The Department of Veterans Affairs (VA) is establishing national standards of practice for health care professionals who have a license, certification, registration, or other state requirement. The VA national standards of practice are a standardized set of services that all health care professionals in a given occupation can perform while employed by VA if their VA medical facility performs such services and they have the proper education, training, and skill to perform the services. As part of a comprehensive development process to establish each occupation's national standard of practice, VA affords the public, Veterans, professional associations, VA employees, unions, and other interested parties the opportunity to provide feedback on the national standard of practice prior to finalization and publication in VA policy.

Therapeutic Medical Physicists ensure the safe and effective use of radiation in radiation oncology.

On March 14, 2023, VA sent letters to the American Association of Physicists in Medicine, the American Board of Radiology, the American Board of Medical Physics, and the Canadian College of Physicists in Medicine to inform them of VA's intent to follow the Medical Physics Practice Guidelines, as established by the American Association of Physicists in Medicine, for the national standard of practice for Therapeutic Medical Physicists and provided them with an opportunity to discuss the proposed national standard of practice with VA. VA also sent letters to the four state licensing boards for Therapeutic Medical Physicists to inform them of VA's intent to follow the certification standards for the national standard of practice for Therapeutic Medical Physicists.

In addition, from March 14 to May 15, 2023, VA posted the proposed national standard of practice for VA Therapeutic Medical Physicists in the Federal Register ([88 FR 15855](#)) for public comment and within VA's intranet for VA employee comment.

The proposed national standard of practice for Therapeutic Medical Physicists received 46 total comments across all platforms—0 responses from the state licensing boards for Therapeutic Medical Physicists, 43 responses from VA employees, 0 comments from individuals from the public, two comments from the national certification bodies for Therapeutic Medical Physicists, one comment from the national standards body, and 0 comments from professional associations. VA reviewed all comments and made no changes in response to any comments.

This report provides a summary of comments received on the proposed Therapeutic Medical Physicist national standard of practice. It also provides VA's response to the comments received.

Authority

Chapters 73 and 74 of title 38 of the United States Code (U.S.C.) and 38 U.S.C. 303 permit the Secretary to further regulate the Department of Veterans Affairs health care professions to make certain that VA's health care system provides safe and effective health care by qualified health care professionals to ensure the well-being of those Veterans who have borne the battle.

On November 12, 2020, VA published an interim final rule confirming that VA health care professionals may practice their health care profession consistent with the scope and requirements of their VA employment, notwithstanding any state license, registration, certification, or other state requirements that unduly interfere with their practice. 38 CFR 17.419; 85 FR 71838. Specifically, this rulemaking confirmed VA's current practice of allowing VA health care professionals to deliver health care services in a state other than the health care professional's state of licensure, registration, certification, or other state requirement, thereby enhancing Veterans' access to critical VA health care services. The rulemaking also confirmed VA's authority to establish national standards of practice for its health care professionals which would standardize a health care professional's practice in all VA medical facilities, regardless of conflicting state laws, rules, regulations, or other state requirements.

The rulemaking explained that a national standard of practice describes the tasks and duties that a VA health care professional practicing in the health care profession may perform and may be permitted to undertake. Having a national standard of practice means that individuals from the same VA health care profession may provide the same type of tasks and duties regardless of the state where they are located or the state license, registration, certification, or other state requirement they hold. VA emphasized in the rulemaking and reiterates here that VA will determine, on an individual basis, that a health care professional has the proper education, training, and skills to perform the tasks and duties detailed in the national standard of practice and that they will only be able to perform such tasks and duties after they have been incorporated into the individual's privileges, scope of practice, or functional statement. The rulemaking explicitly did not create any such national standards and directed that all national standards of practice would be subsequently created via policy.

As authorized by 38 CFR 17.419, VA is developing national standards of practice via policy. There will be one overarching national standard of practice directive that will generally describe Veterans Health Administration (VHA) policy; each individual national standard of practice will be an appendix to the directive. The directive and all appendices will be accessible on the VHA Publications website at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external) once published.

Purpose

As the Nation's largest integrated health care system, it is critical that VA develops national standards of practice to ensure first, that beneficiaries receive the same high-quality care regardless of where they enter the system and, second, that VA health care professionals can efficiently meet the needs of beneficiaries when practicing within the scope of their VA

employment. National standards are designed to increase beneficiaries' access to safe and effective health care, thereby improving health outcomes.

The importance of this initiative has been underscored by the coronavirus disease 2019 (COVID-19) pandemic. The increased need for mobility in VA's workforce, including through VA's Disaster Emergency Medical Personnel System, highlighted the importance of creating uniform national standards of practice to better support VA health care professionals who practice across state lines. As a national health care organization, VA often has health care professionals primarily based out of a VA medical center in one state travel to smaller community-based outpatient clinics in neighboring states to ensure access to care for Veterans.

Creating national standards of practice also promotes interoperability of medical data between VA and Department of Defense (DoD), providing a complete picture of a veteran's health information and improving VA's delivery of health care to our Nation's veterans. DoD has historically standardized practice for certain health care professionals, and VA has closely partnered with DoD to learn from their experience.

As a national health care system, it is also imperative that VA can recruit and retain health care professionals, to ensure there is access to health care regardless of where the Veteran resides. VA needs the flexibility to hire qualified health care professionals from any state to meet the staffing needs of a VA medical facility where recruitment or retention is difficult. This flexibility is especially beneficial in recruiting spouses of active service members who frequently move across the country and can be subject to delays in starting new employment due to needing to obtain an additional state requirement to practice in the new state.

Development Process

To develop VA's national standards of practice, VA is using a robust, interactive process that adheres to the guidelines outline in [Executive Order \(EO\) 13132](#) to preempt conflicting state laws, rules, regulations, or other requirements. All standards undergo a deliberate review process, both within VA and externally, to ensure that the draft national standard is consistent with VA's team-based approach to care, results in the highest quality of care for Veterans, is implementable on an enterprise level, and is legally supportable. The process includes consultation with internal and external stakeholders, including state licensing boards, VA employees, professional associations, Veterans Service Organizations, labor partners, and others.

For each VA occupation, a workgroup comprised of health care professionals in the identified occupation conducts research to identify internal best practices that may not be authorized under every state license, certification, or registration, but would enhance the practice and efficiency of the profession throughout the VA. If a best practice is identified that is not currently authorized by every state, the workgroup determines what education, training, and skills are required to perform such task or duty. The workgroup then drafts a VA national standard of practice using the data gathered during the research and incorporates internal stakeholder feedback into the standard. The workgroup may consult with internal or external stakeholders at any point throughout the process.

The proposed national standard of practice is internally reviewed, to include by an interdisciplinary workgroup consisting of representatives from Quality Management; VA Medical Center Chief of Staff; Academic Affiliates; Veterans Integrated Services Network (VISN) Chief Nursing Officer; Ethics; Workforce Management and Consulting; Surgery; Credentialing and Privileging; VISN Chief Medical Officer; and Electronic Health Record Modernization.

Externally, the proposed national standard of practice is provided to our partners in DoD as a notification and opportunity to flag inconsistencies with DoD standards. In addition, VA labor partners are engaged informally as part of a pre-decisional collaboration. Consistent with EO 13132, a letter is sent to each state board and certifying organization or registration organization, as appropriate, which includes the draft national standard and offers the recipient an opportunity to discuss the national standard with VA. After the state boards, certifying organizations, or registration organizations have received notification, the draft national standard of practice is posted in the Federal Register for 60 days to obtain feedback from the public, professional associations, and any other interested parties. At the same time, the draft national standard is posted to an internal VA site to obtain feedback from VA employees. Responses received through all vehicles—from state boards, professional associations, unions, VA employees, and any other individual or organization who provides comments via the Federal Register—will be reviewed. VA will make appropriate revisions in light of the comments, including those that present evidence-based practice and alternatives that help VA meet our mission and goals. VA may also make additional changes outside the scope of the comments during its own internal review processes after the conclusion of the comment period. This document provides a summary of the comments received and VA's response to the comments.

VA Therapeutic Medical Physicists: Feedback on National Standard

VA Therapeutic Medical Physicists ensure the safe and effective use of radiation in radiation oncology. Therapeutic Medical Physicists perform or oversee the scientific and technical aspects of radiotherapy procedures necessary to achieve this objective. In the clinical setting, this involves the use of ionizing or nonionizing radiation in the planning and delivery of radiotherapy treatments. Therapeutic Medical Physicists collaborate with radiation oncologists and monitor equipment to ensure each patient's safety. VA employs fewer than 20 Therapeutic Medical Physicists in the United States

VA's proposed national standard of practice for Therapeutic Medical Physicists did not propose to preempt any current state requirements and instead proposed to confirm that all Therapeutic Medical Physicists follow the Medical Physics Practice Guidelines from the American Association of Physicists in Medicine. Therapeutic Medical Physicists at VA are certified by the American Board of Radiology, the American Board of Medical Physics, or the Canadian College of Physicists in Medicine. All three certification bodies follow the Medical Physics Practice Guidelines from the American Association of Physicists in Medicine. Currently, all VA Therapeutic Medical Physicists follow this standard; therefore, there would be no change in practice for any Therapeutic Medical Physicist in VA.

On March 14, 2023, VA posted the proposed national standard of practice for Therapeutic Medical Physicists in the [Federal Register](#) (88 FR 15855) and within VA's intranet for public and employee

feedback, respectively. The proposed national standard of practice remained open for comment for 62 days, through May 15, 2023. A copy of the draft national standard of practice for Therapeutic Medical Physicists that was posted for feedback is located in [Appendix A](#).

The Under Secretary for Health also sent letters to the American Board of Radiology, the American Board of Medical Physics, the Canadian College of Physicists in Medicine, the American Association of Physicists in Medicine, and state licensing boards for Florida, Hawaii, New York, and Texas to inform them of VA's intent to follow the Medical Physics Practice Guidelines and provide them with an opportunity to provide feedback directly to VA. Copies of those letters are located in [Appendix B](#).

VA specifically sought feedback through the following questions:

1. *Are there any required trainings for the aforementioned practices that we should consider?*
2. *Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any state?*
3. *Is there any variance in practice that we have not listed?*
4. *What should we consider when preempting conflicting state laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?*
5. *Is there anything else you would like to share with us about these national standards of practice?*

In addition to leaving specific comments and suggestions, commenters internal to the VA could choose to provide agreement or disagreement on the proposed national standard. Agreement denotes overall acceptance of the standard while disagreement denotes that the national standard in its original form presents significant clinical, legal, or patient safety concerns. Employees could also select not applicable if the national standard did not pertain to their area of expertise.

In response to the proposed national standard of practice for Therapeutic Medical Physicists, VA received 0 comments from the public through the Federal Register. Through an internal VA site, VA received 43 comments from VA employees. VA received one comment from the standards body through the Federal Register and feedback from two of the three certification bodies for Therapeutic Medical Physicists—the American Board of Medical Physics and the American Board of Radiology. Out of the 43 employee comments, 26 employees *agreed* and 17 employees selected *not applicable*.¹

Standards Body Feedback

On March 14, 2023, VA sent a letter to the American Association of Physicists in Medicine to inform them of VA's intent to follow the Medical Physics Practice Guidelines, as established by the American Association of Physicists in Medicine, for the national standard of practice for Therapeutic Medical Physicists and provided them with an opportunity to discuss the proposed national standard of practice with VA.

¹ At the time of feedback, employees were prompted to select “concur,” “concur with comments,” and “non-concur.”

Comments: The American Association of Physicists in Medicine commented via the Federal Register, agreeing that the Medical Physics Practice Guidelines (MPPG) are guidelines for best practices in medical physics. The organization also noted that in conjunction with its sister organization, the American College of Radiology, they also publish the American Association of Physicists in Medicine/American College of Radiology Technical Practice Standards that are also used to maintain high quality and safe radiation oncology.

The American Association of Physicists in Medicine also encouraged VA to continue only employing certified Therapeutic Medical Physicists who maintain an active, current, full, and unrestricted certification from the American Board of Radiology, the American Board of Medical Physics, or the Canadian College of Physicists in Medicine and who participate in continuing education. The American Association of Physicists in Medicine also stated that VA is understaffed for Therapeutic Medical Physicists, which could impact implementation of the national standards of practice.

Response: VA qualification standards, as more specifically described in VA Handbook 5005, Staffing, Part II, Appendix G48, require a full, active, and unrestricted certification from the American Board of Radiology, the American Board of Medical Physics, or the Canadian College of Physicists in Medicine. Qualification standards will not change as a result of this national standard of practice.

VA is following the MPPG from the American Association of Physicists in Medicine in its national standard of practice for Therapeutic Medical Physicists because the MPPG are more current than other guidelines like the Technical Practice Standards from the American Association of Physicists in Medicine/American College of Radiology and based on the consensus best medical physics practice standards.

Qualification standards and standards of practice cannot be lowered related to any concerns regarding staffing. VA needs the flexibility to hire qualified health care professionals from any state to meet the staffing needs of a VA medical facility where recruitment or retention is difficult. This flexibility is especially beneficial in recruiting spouses of active service members who frequently move across the country and can be subject to delays in starting new employment due to the need to meet additional state requirements such as a certificate, license, or registration to practice in the new state.

Certification Body Feedback

March 14, 2023, VA sent letters to the American Board of Radiology, the American Board of Medical Physics, and the Canadian College of Physicists in Medicine to inform them of VA's intent to follow the Medical Physics Practice Guidelines, as established by the American Association of Physicists in Medicine, for the national standard of practice for Therapeutic Medical Physicists and provided them with an opportunity to discuss the proposed national standard of practice with VA.

Comment: The American Board of Medical Physics was supportive of VA's effort to develop a national standard of practice for Therapeutic Medical Physicists. It agreed with VA's proposal to follow MPPG from the American Association of Physicists in Medicine, but asked VA to clarify

that the MPPG is a minimum practice guideline for Therapeutic Medical Physicists. The American Board of Medical Physics suggested adding the definition of a Qualified Medical Physicist to the national standard of practice. The American Board of Medical Physics suggested that VA consider Nuclear Regulatory Commission (NRC) regulations for medical physics practices, as well as requiring additional training from the certification bodies or the NRC for special procedures such as brachytherapy and gamma knife stereotactic procedures. It also suggested that VA consider the qualifications for radiotherapy centers indicated by the American College of Radiology or the American Society for Radiation Oncology's APEX accreditation for radiotherapy facilities. Finally, it suggested allowing individuals with the American Board of Medical Physics's Magnetic Resonance Imaging in Physics certification, rather than its Radiation Oncology Physics certification or the American Board of Radiology's certification, to be able to use magnetic resonance-guided linear accelerator (MR-LINAC) as this is a possible area of variance.

Response: The MPPG serve as minimum practice guidelines for Therapeutic Medical Physicists. Because all VA Therapeutic Medical Physicists are certified by the American Board of Radiology, the American Board of Medical Physics, or the Canadian College of Physicists in Medicine, they are qualified to perform all radiotherapy procedures, including MR-LINAC procedures. Regarding standards for radiotherapy centers from the American College of Radiology and the American Society for Radiation Oncology, national standards of practice are standards of clinical practice and not facility standards for radiotherapy centers.

Per the American Association of Physicists in Medicine, a Qualified Medical Physicist is an individual who is competent to provide clinical services in one or more of the subfields of medical physics. However, since this national standard of practice applies only to Therapeutic Medical Physicists and not to any other subfields, VA is not adding Qualified Medical Physicists to its national standard of practice. Additionally, Therapeutic Medical Physicists is the occupation title at VA; however, Therapeutic Medical Physicists certified by the American Board of Radiology, the American Board of Medical Physics, or the Canadian College of Physicists in Medicine—as VA Therapeutic Medical Physicists are required to be—are Qualified Medical Physicists. Therapeutic Medical Physicists at VA are in compliance with all States. Qualification standards for Therapeutic Medical Physicists at VA, as outlined in Handbook 5005, Staffing, Part II, Appendix G48, dated July 8, 2015, will not change as a result of the national standards of practice.

VA Handbook 5005, Staffing, Part II, Appendix G48, dated July 8, 2015, sets the minimum training and certification requirements for VA Therapeutic Medical Physicists. VA ensures all Therapeutic Medical Physicists have the appropriate education and training to perform their job duties, including to perform special procedures such as brachytherapy and gamma knife stereotactic procedures. Thus, the National Standard of Practice does not require additional training from the certification bodies or the NRC. Any specialized training and certifications are supplementary and optional for VA Therapeutic Medical Physicists who are interested in advancing their skills. VA Therapeutic Medical Physicists are qualified to perform all advanced radiotherapy procedures.

Comment: The American Board of Radiology was supportive of VA's draft national standard of practice for Therapeutic Medical Physicists and VA's intent to follow the MPPG for VA Therapeutic Medical Physicists. It also shared its requirements for certification and noted that some advanced treatment modalities may carry the expectation that Therapeutic Medical Physicists receive additional training. The American Board of Radiology also indicated that Therapeutic Medical Physicists must register with the NRC in order to perform brachytherapy and therefore, VA should consider including in its national standard of practice for Therapeutic Medical Physicists a statement concerning this NRC requirement.

“[We] applaud the announcement that the VA’s proposed standards will be consistent with Medical Physics Practice Guidelines. . . [as they are] arguably the most widely recognized and definitive standards of clinical practice for therapeutic medical physicists in the United States.”—Comment from the American Board of Radiology

Response: VA Handbook 5005, Staffing, Part II, Appendix G48, dated July 8, 2015 sets the minimum training and certification requirements for VA Therapeutic Medical Physicists. VA ensures all Therapeutic Medical Physicists have the appropriate education and training to perform their job duties.

Additionally, Therapeutic Medical Physicists certified by the American Board of Radiology, the American Board of Medical Physics, or the Canadian College of Physicists in Medicine are eligible by the terms of certification to register with the NRC. Furthermore, as a Federal department, VA has authority to use radiation under its National Health Physics Program, which provides regulatory oversight for the NRC master materials license issued to VA.

State Licensing Board Feedback

On March 14, 2023, VA sent letters to the four State licensing boards for Therapeutic Medical Physicists with the proposed national standard of practice and provided them an opportunity to discuss the proposed national standard of practice with VA. VA has not received any comments from the State boards as of the posting of this report in December 2023. VA is always receptive to State feedback.

Feedback Across Five Areas

All commenters had the opportunity to provide responses to the five areas on which VA solicited feedback, and VA responds to any questions or concerns raised by the commenters in response to those areas below.

VA received comments from employees that were supportive of the draft national standard of practice, as well as comments that were not responsive to the specific national standard of practice.

1. Are there any required trainings for the aforementioned practices that we should consider?

Comments: Multiple VA employees mentioned additional training that may be required for Therapeutic Medical Physicists who perform special procedures, such as brachytherapy (internal radiation), gamma knife radiosurgery, stereotactic body radiation therapy, high dose-rate brachytherapy afterloader, and permanent radioactive seed implants should be included within the draft standard of practice. One employee indicated that Therapeutic Medical Physicists must register with the NRC in order to perform brachytherapy and therefore, VA should consider including in its national standard of practice for Therapeutic Medical Physicists a statement concerning this NRC requirement.

Response: This national standard of practice does not contain an exhaustive list of all tasks and duties that a Therapeutic Medical Physicist can or must perform. Therapeutic Medical Physicists certified by the American Board of Radiology, the American Board of Medical Physics, or the Canadian College of Physicists in Medicine are eligible by the terms of certification to register with the NRC. VA Handbook 5005, Staffing, Part II, Appendix G48, dated July 8, 2015, sets the minimum training and certification requirements for VA Therapeutic Medical Physicists. VA ensures all Therapeutic Medical Physicists have the appropriate education and training to perform their job duties. Any specialized training and certifications are supplementary and optional for VA Therapeutic Medical Physicists who are interested in advancing their skills. However, as a Federal department, VA has authority to use radiation under its National Health Physics Program, which provides regulatory oversight for the NRC master materials license issued to VA.

Comment: One employee suggested that a Commission on Accreditation of Medical Physics Education Programs (CAMPEP) accredited degree be required for Therapeutic Medical Physicists at VA.

Response: VA qualification standards for Therapeutic Medical Physicists, as more specifically described in VA Handbook 5005, Staffing, Part II, Appendix G48, dated July 8, 2015, require a master's degree or higher in a physics, science, or engineering discipline recognized by an accredited college or university. Qualification standards also require a certification, which itself requires a degree from a CAMPEP accredited program. VA reiterates that the qualification standards are not changing as a result of the national standards of practice.

Comment: One employee suggested that VA include information on maintenance of certification in the draft national standard of practice.

Response: Employment at VA as a Therapeutic Medical Physicist requires an active, current, full, and unrestricted certification, as outlined in VA qualification standards. VA Handbook 5005, Staffing, Part II, Appendix G48, dated July 8, 2015. VA reiterates that the qualification standards are not changing as a result of the national standards of practice.

2. Are there any factors that would inhibit or delay the implementation of the aforementioned practices for VA health care professionals in any State?

Comment: One employee suggested that obtaining a relevant State license should be part of the new employee onboarding process. Another employee asked for clarification of the State license requirements.

Response: VA Handbook 5005, Staffing, Part II, Appendix G48, dated July 8, 2015, sets the minimum training and certification requirements for VA Therapeutic Medical Physicists. VA qualification standards for Therapeutic Medical Physicists require a certification from the American Board of Radiology, the American Board of Medical Physicists, or the Canadian College of Physicists in Medicine. While four States require licensure for Therapeutic Medical Physicists, VA's qualification standards do not. VA ensures all Therapeutic Medical Physicists have the appropriate education and training to perform their job duties. VA qualification standards will not change as a result of this national standard of practice.

Comment: Two employees asked whether job descriptions or functional statements would be changed and when the qualification standards will be updated for Therapeutic Medical Physicists at VA.

Response: VA qualification standards will not change as a result of this national standard of practice. VA's current qualification standards for Therapeutic Medical Physicians require certification by the American Board of Radiology, the American Board of Medical Physicists, and the Canadian College of Physicists in Medicine and thus do not require updates at this time. Because the practice of Therapeutic Medical Physicists at VA will not change as a result of this national standard of practice, neither job descriptions nor functional statements for VA Therapeutic Medical Physicists will change.

3. Is there any variance in practice that we have not listed?

The comment related to this request for information, from the American Board of Medical Physics, is addressed above.

4. What should we consider when preempting conflicting State laws, regulations, or requirements regarding supervision of individuals working toward obtaining their license or unlicensed personnel?

Comments: One employee noted the exclusion of health professions trainees from the draft national standard of practice for Therapeutic Medical Physicists, affirming that supervision from individuals with the appropriate license or certification is required. They also stated that health professions trainees coming to VA for clinical training must be from accredited programs.

Response: The national standard of practice for Therapeutic Medical Physicists does not apply to students, residents, trainees, or otherwise non-credentialed staff. Only certified employees are impacted by the national standard of practice. The appointment of non-credential staff is governed by VA qualification standards. VA Handbook 5005, Staffing, Part II, Appendix G48, dated July 8, 2015.

Comments: Two employees suggested that Therapeutic Medical Physicists without certification working towards obtaining their certification be hired so long as they are supervised by a Qualified Medical Physicist or a Chief Therapeutic Medical Physicist, respectively.

Response: The qualification standards for Therapeutic Medical Physicists include allowing the hiring of entry level Therapeutic Medical Physicists to work under a Therapeutic Medical Physicist

for a period not to exceed two years. VA Handbook 5005, Staffing, Part II, Appendix G48, dated July 8, 2015.

5. Is there anything else you would like to share with us about these national standards of practice?

The comments related to this request for information, from the American Association of Physicists in Medicine and the American Board of Medical Physics, are addressed above.

Conclusion

VA is not making any changes to the Therapeutic Medical Physicist national standard of practice based on the comments for the reasons described above. VA carefully considered all comments when making this decision.

The final national standard of practice for Therapeutic Medical Physicists will be an appendix to VHA Directive 1900, VA National Standards of Practice and accessible on VHA Publications website at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external) once published. In accordance with VHA's national policy process, the national standard of practice for Therapeutic Medical Physicists will be reviewed and recertified at minimum on a five-year cycle.

Appendix A: Draft National Standard of Practice for Therapeutic Medical Physicists

Appendix A includes the draft national standard of practice for Therapeutic Medical Physicists posted to the Federal Register and within VA on March 14, 2023, for individuals to provide feedback on. The final national standard of practice for Therapeutic Medical Physicists is written into VHA Directive 1900, VA National Standards of Practice, posted at <https://vaww.va.gov/vhapublications/> (internal) and <https://www.va.gov/vhapublications/> (external).

1. Therapeutic Medical Physicists (TMPs) assure the safe and effective use of radiation in radiation oncology. TMPs perform or oversee the scientific and technical aspects of radiotherapy procedures necessary to achieve this objective. In the clinical setting, this involves the use of ionizing or nonionizing radiation in the planning and delivery of radiotherapy treatments. TMPs collaborate with radiation oncologists and monitor equipment to ensure each patient's safety.
2. Therapeutic Medical in the Department of Veterans Affairs (VA) possess the required education and certification from The American Board of Radiology (ABR), the American Board of Medical Physics (ABMP), or The Canadian College of Physicists in Medicine (CCPM) as required by VA qualification standards, as more specifically described in VA Handbook 5005, Staffing, Part II, Appendix G48.
3. This national standard of practice confirms that Therapeutic Medical Physicists practice in accordance with the Medical Physics Practice Guidelines (MPPG) standards from the American Association of Physicists in Medicine (AAPM), available at: <https://www.aapm.org/>. As of August 2021, all Therapeutic Medical Physicists in VA follow this national standard.
4. Although VA only requires a certification, four States require a State license in order to practice as a TMP in that State: Hawaii, Florida, New York, and Texas. As of February 2022, there is no variance in how VA Therapeutic Medical Physicists practice in any State.

Appendix B: VA Under Secretary for Health Letters

Letter	Organization	Responded to VA as of November 2, 2023*
 Letter to the American Association of Physicians in Medicine	American Association of Physicians in Medicine	Yes
 Letter to American Board of Medical Physicians	American Board of Medical Physicians	Yes
 Letter to American Board of Radiology	American Board of Radiology	Yes
 Letter to Canadian College of Physicians in Medicine	Canadian College of Physicians in Medicine	No
 Letter to Florida Advisory Council of Medical Physicians	Florida Advisory Council of Medical Physicians	No
 Letter to Hawaii Department of Health	Hawaii Department of Health	No
 Letter to New York State Committee for Medical Physicians	New York State Committee for Medical Physicians	No
 Letter to Texas Medical Physicians Licensure Advisory Committee	Texas Medical Physicians Licensure Advisory Committee	No

**VA reviewed all comments received and made appropriate revisions to the VA standard of practice for Therapeutic Medical Physicians in light of the comments, to include those that help VA meet its mission and goals through evidence-based practice and alternatives. This final report is a collective response to all comments; however, VA will continue to actively engage with states.*