

## Interpreting Physician Overview

### Key Words/Related Topics

#### Discussion:

In order to independently interpret mammograms, one must qualify as an interpreting physician. To do this, one must have either qualified as an interpreting physician under the interim regulations prior to April 28, 1999, OR after April 28, 1999, have documented all of the following requirements:

1. Have a valid State license to practice medicine.
2. Be Board Certified in Diagnostic Radiology by an FDA-approved body or have 3 months of formal training in mammography.
3. Have 60 category I CME credits in mammography with at least 15 obtained in the 3 years immediately prior to qualifying as an interpreting physician.
4. Have interpreted, under direct supervision, 240 mammographic examinations from in the 6 months immediately prior to qualifying as an interpreting physician OR if the physician passed his/her certifying board in diagnostic radiology at the first allowable time the 6 month period could have been anytime in the last two years of the residency program. See Sample Residency Letter – Interim Regulations and Sample Residency Letter – Final Regulations.

After meeting all the initial requirements, ALL interpreting physicians must:

1. Maintain continuing education (15 category I CME's/36 months).
2. Maintain continuing experience (960 examinations/24months).
3. Physicians failing to maintain the continuing requirements must requalify prior to performing independent mammographic interpretation.
  - (a) Continuing education: Must bring total up to 15 CME's/3 years.
  - (b) Continuing experience: Interpret 240 examinations under direct supervision or interpret a sufficient number, under direct supervision, to bring total to 960/24 months, whichever is less.
4. Maintain a valid State license to practice medicine.

All interpreting physicians shall participate in quality assurance activities as described in 900.12(d)(1)(ii).

Each mammographic facility shall designate one interpreting physician to be the lead interpreting physician, who is responsible for ensuring that the facility's quality assurance program meets the requirements of 900.12(d-f). 21 C.F.R. 900.2(x).

Each mammographic facility shall also designate at least one interpreting physician to be the audit interpreting physician(s), who is/are responsible for analyzing the medical outcomes audit. The reviewing interpreting physician may or may not be the lead interpreting physician. 21 C.F.R. 900.12(f)(3).

Physicians in training may work at facilities as long as they are under the direct supervision of a qualified interpreting physician.

#### Interpreting Physician Qualification Worksheet

*This worksheet may be used by facilities to help ensure that their personnel meet all applicable requirements prior to providing mammography services.*

Initial Qualifications Met Before 4/28/99  
(INTERIM)

Need: \_\_\_ Valid license (any State)

Need one of the following:

\_\_\_ ABR, AOBR, or RCPSC

\_\_\_ Two months of training

Need: \_\_\_ 40 hours CMEs

(attestation allowed if CMEs obtained prior to 10/1/94)

Initial Qualifications Met After 4/28/99  
(FINAL)

Need: \_\_\_ Valid license (any State)

Need one of the following:

\_\_\_ ABR, AOBR, or RCPSC

\_\_\_ Three months of training

Need: \_\_\_ 60 hours Category 1 CMEs of which 15

were earned in the past three years

Need: \_\_\_\_ 240 patient exams in any 6 month period  
(attestation allowed if the exams were completed prior  
to 10/1/94)

Need one of the following:

\_\_\_\_ 240 patient exams in prior 6 month period  
\_\_\_\_ Certified at first allowable time & 240 patient  
exams in the last two years of residency

**START DATE** \_\_\_\_\_

(The later of 10/1/94 or date the last initial qualification was completed)

\_\_\_\_ 8 hours initial training in additional mammographic modality used (if applicable)

DATE COMPLETED \_\_\_\_\_

Continuing Qualifications

All of the following:

\_\_\_\_ 960 patient exams in the 24 months prior to the current date  
(applicable 24 months after start date)

\_\_\_\_ 15 Category I CMEs in the 36 months prior to the current date  
(applicable 36 months after start date)

#### Key Words:

Qualified Instructor, Personnel, Interpreting Physician, Interim Regulations, Direct Supervision,  
Initial Qualifications, Continuing Education, Continuing Experience, Quality Assurance

#### Related Topics:

Acceptable Documents for Interpreting Physicians

Annual Quality Control Tests

Daily Quality Control Tests

Direct Supervision of Interpreting Physicians

Interpreting Physician's Initial Training – 60 hours of medical education

Interpreting Physician's Responsibilities

Medical Outcomes Audit Program

Quality Assurance Program

Quarterly Quality Control Tests

Sample Residency Letter – Interim Regulations

Sample Residency Letter – Final Regulations

Semiannual Quality Control Tests

Weekly Quality Control Tests