

CONTRIBUIÇÃO Nº XXXXX	
Identificação	
Autor da Contribuição: Mahé-Dominique Becker Categoria: Instituição de Ensino Instituição: TriStar Educação Email: tatiane.pastre@tristareducacao.com.br	Documento: ---- Trecho a discutir ou aspecto não previsto que se propõe abordar: Parágrafo 48 Tipo de Contribuição: Sugestão de Alteração Arquivo anexo: ---
Contribuição	
Texto sugerido para alteração ou inclusão: (48) Renovação periódica de 5% da biblioteca de imagens a fim de evitar sua memorização: I - Módulo Treinamento - no mínimo, anualmente; e II - Módulo Avaliação - no mínimo, a cada 2 (dois) anos.	
Justificativa: I. Training modules image library update: Instead of a 5% annual update, consider: <ul style="list-style-type: none"> Increasing the minimum required library size if memorization is a concern Exempting libraries from updates if their total size is at least three times the minimum (e.g., 39,000+ images) Harmonize with EU regulation 2015/1998 regulations: 10% update on min. image amount of 1000 images with at least 250 different forbidden items, i.e. 100 images. Removing the update requirement entirely Additional context and reasoning: <ul style="list-style-type: none"> The mandatory annual update of 5% of the library could discourage larger libraries, as updates scale with the total number of images. The current 5% update rule may unintentionally penalize providers with larger libraries by increasing their update burden. This could discourage providers from offering more images, despite larger libraries being beneficial for reducing memorization. This contradicts the goal of reducing memorization risk since larger libraries inherently lower that risk The mandated training time (15 minutes per week, table Appendix D) and typical training image analysis speed (15 seconds per image) suggest screeners view around 3,120 images per year. This is significantly lower than the 13,000-image requirement (table Appendix C), making memorization unlikely The current requirement for the training module image library is 13,000 images. Given that screeners analyse an estimated 3,120 images per year, the existing library size is more than sufficient to prevent memorization II. Tests (Assessment) modules image library update: Instead of enforcing strict update requirements, consider: <ul style="list-style-type: none"> Removing the update requirement entirely or extend it to at least 5 years Monitoring test data for 1–2 years before deciding on necessary adjustments Using real performance data to determine if updates are needed, rather than assuming they are Additional context and reasoning: <ul style="list-style-type: none"> The risk of memorization in certification/recertification tests is low since screeners take these tests infrequently (every 2–3 years) and regularly analyse thousands of images in their daily work. So the need for updates is unclear. A data-driven approach would be more effective in determining whether updates are necessary. For cross referencing the exam results between different users and their performance it is crucial to maintain the same test for a certain period of time. 	

