

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, April 11, 2018 3:31:34 PM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, April 11, 2018 3:00 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: Jon

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State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I submit a new recommendation to be added to those embodied in the current Staff Report. The recommendation is given below, in the next section.

Any Alternative or New Recommendations on This Agency:

I urge that a change be made to the Medical Physicists Scope of Practice (TAC Title 22, Part 9, §160.17) to allow an additional specialty in Magnetic Resonance Imaging (MRI). There are currently specialties in Diagnostic, Therapy, Nuclear Medicine, and Health Physics.

The Scope of Practice now treats MRI as part of Diagnostic Medical Physics, which also includes all x-ray and ultrasound imaging modalities. This was appropriate at the time the scope of practice was originally defined, but MRI imaging has both expanded in its applications to medical imaging and in its degree of complexity. Now it is a highly specialized field requiring dedicated, special expertise and training to master its details. As a consequence, people that invest the required effort to become true experts in this field tend to be highly specialized and will not necessarily have in depth-experience with x-rays or ultrasound. This imposes an unnecessary burden on them when it comes to licensure, since to become board certified in Diagnostic Physics they have to master, in addition to their actual specialty, a broad range of material (x-ray imaging, radiation safety, radiation shielding, etc.) that will not have any application in MRI physics .

There is at least one specific Board Certification in MRI, available through the American Board of Medical Physics, which is available to validate that individuals are qualified to independently practice as Medical Physicists in MRI. If the Scope of Practice was enlarged by adding an MRI specialty tied to this Board Certification, physicists certified by this way could become licensed to practice MRI Physics in the State of Texas. This would allow highly qualified (and highly specialized) physicists to provide independent services, thus benefiting the individuals involved, the medical industry within Texas, and the citizens of Texas.

Adopting the proposed change would place MRI Medical Physics in the same position as Nuclear Medicine Medical Physics (one of the specialties currently endorsed by the Scope of Practice). In both cases, the covered modalities and the training necessary to become expert in the associated practice of Medical Physics are distinct from x-ray Diagnostic Medical Physics. In both cases, specific Board Certifications are available to verify that the practitioners are qualified individuals.

I urge you to consider making this change to the Scope of Practice.

My Comment Will Be Made Public: I agree