

Mr. Ken Levine
Director, Sunset Advisory Commission
P.O. Box 13066
Austin, TX 78711

Dear Mr. Levine,

Thank you for this opportunity to comment on the Sunset Staff Report. I wish to comment on one aspect of the new recommendations for medical physicists.

The Texas Medical Board has implemented modified rules, possibly based on their experience with other groups of license holders that are unfairly affecting the training opportunities for medical physicists in Texas. The specific rule permits holders of Training Licenses to request a maximum of four annual renewals following the first one-year term, meaning that a Training License has a maximum term of five years.

A medical physicist must complete a residency program to be eligible to take the certification exams offered by the American Board of Radiology. Such residencies are typically 2, 3 or 4 years in length (at MD Anderson, we offer programs of different lengths to accommodate the inclusion of research experience with the mandatory 24 months of clinical experience.) Unlike physicians, who are licensed when they complete medical school, a medical physicist must hold a Training License during the term of a medical physics residency. If a resident completes a 4-year program, his or her license then will expire one year after completing the residency, during which time he or she must pass both the ABR Part 2 and Part 3 (oral) exams (the Part 1 exam can be taken during graduate school.) The ABR permits a candidate six years to complete this process after finishing the residency but the state effectively allows graduates of a 4-year residency only one year.

Ideally, of course, we'd like to hope that our residency graduates pass both exams on the first attempt, but the ABR's own data show that this is frequently not the case; the passing rates are about 70% to 80% for the best-prepared candidates, for both the Part 2 and oral exams. While candidates are preparing to be re-examined, they are advised to continue to work, under supervision, in a clinical environment. But again, the state's rules effectively prevent this. At an institution like MD Anderson, trainees without licenses lose their medical staff credentials, so are prohibited from the clinic. The result is that a graduate of a 4-year residency who fails either exam even once, will probably have to leave the state and seek work elsewhere. This hardly seems like a sustainable outcome, and will ultimately adversely affect our training programs, which are arguably among the best in the country.

I hope that you are able to introduce these comments during the hearing on December 8. I further hope that the Sunset Commission will consider recommending extension of Training Licenses for medical physicists to allow them opportunities to pass the ABR exams that are consistent with the ABR's own rules.

Sincerely yours,

CC: Robert Blech
Nikos Papanikolaou, PhD
Charles Beasley, PhD



Geoffrey S. Ibbott, Ph.D.
Professor and Chairman, Department of Radiation Physics
UT MD Anderson Cancer Center