

November 16, 2016

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

Dear Mr. Levine,

Thank you for the opportunity to comment on the Sunset Staff Report. I am writing to express our concerns on the following rule, under Part 9 Texas Medical Board, for training licensure of medical physicists:

*§160.10 (c) Each training license may be renewed annually up to four times. The licenses do not have to be for consecutive years.*

Our Imaging Physics Residency Program has a pathway that combines clinical and research training with a period of 3 years. The residents enrolled in the program are recognized as M.D. Anderson Fellows in Medical Physics. The Fellows are required to practice medical physics with the training license during the whole period of 3 years. At the end of the Fellowship, they will fulfill the requirement for taking the American Board of Radiology (ABR) Part 2 and Oral examinations.

Under the current ABR requirement, trainees are able to take the Part 2 exam in August if they complete the residency training by 8/31 of the same year. If they pass the Part 2, they will then take the Oral in the following May. The ABR permits a candidate six years to complete this process after finishing the residency.

In my opinion, the TMB rule §160.10 (c) puts unnecessary limits to the opportunities for our Fellows to become ABR-certified medical physicists after their residency training. Their clinical training plus the time between the schedule of two exams will require at least four years of the training license. If they failed or conditioned in any of the exams by more than once, according to the rule, they would lose their license and not be able to obtain further training in order to complete the board exams. I would like to emphasize that they would be allowed by the ABR to be re-examined, should this situation happen, and it would be this rule that prevented them from taking the opportunity within the state of Texas.

As one of the best Imaging Physics Residency Programs in the country, we strive to provide best education to generate medical physicists in highest quality. I hope the Sunset Commission will consider recommending extension of training licenses for medical physics trainees so that they will have opportunities to complete the board certification while they are allowed based on ABR's rules.

Sincerely,



Ho-Ling Anthony Liu, Ph.D.  
Professor, Department of Imaging Physics  
Director, Imaging Physics Residency Program