

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, June 27, 2014 1:33:23 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 27, 2014 10:39 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 27, 2014 - 10:38

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Eugenia

Last Name: Brandt

Title: Director State Affairs

Organization you are affiliated with: American College of Radiology

Email: ebrandt@acr.org

City: Washington, DC

State: District of Columbia

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

RE: 2014 Texas Sunset Advisory Commission Report Dear Chairwoman Nelson:

The American College of Radiology (ACR), representing more than 35,000 diagnostic radiologists, interventional radiologists, radiation oncologists, nuclear medicine physicians and medical physicists, appreciates the opportunity to comment on the 2014 Texas Sunset Advisory Commission Report restructuring the Department of State Health Services (DSHS) in a manner that would include the discontinuation of the Texas Board of Licensure for Professional Medical Physicists and the Medical Radiologic Technologist Certification Program.

The ACR develops and publishes a wide variety of practice parameters and technical standards regarding the practice of medical imaging and treatment of patients throughout the United States. The ACR is also a designated accrediting body for medical imaging facilities under both the federal Medicare Improvements for Patients and Providers Act (MIPPA) and the Mammography Quality Standards Act (MQSA). In fact, the ACR accredits the great majority of facilities regulated by both federal laws and for many years, the ACR has been a strong advocate for state licensure of medical personnel. Included below are relevant excerpts from ACR's Digest of Council Actions:

STATE LICENSURE OF MEDICAL RADIOLOGICAL PHYSICISTS "The American College of Radiology strongly supports the concept of state licensure and certification mechanisms for medical radiological physicists; adopted 1989, 1999, 2009 (Res. 1-i) STATE LICENSURE OF RADIOLOGIC TECHNOLOGISTS The American College of Radiology supports licensure, certification, or other appropriate methods designed to assure the qualifications of all persons operating equipment emitting ionizing radiation; adopted 1986, 1996, 2006 (Res. 52-j)."

It is important to point out that national certification for medical physicists and radiologic technologists allows practitioners a way to increase their competency through a course of study and exams, and to advertise their completion of this course of study; however, national certification does not provide any safeguards for the patients as it does not restrict entry into the field. We firmly believe that state licensure is a necessary measure because it offers some degree of control over behavior of those engaged in providing medical care within the state. We write to caution you against removing this safeguard. State licensure encourages better adherence to safety protocols, urges dissemination of best practices, and directly promotes continuous quality improvement of medical care.

We strongly urge you to reconsider and to withdraw the staff recommendation to eliminate licensure programs for both medical radiologic technologists (MRTs) and licensed medical physicists (LMPs) by DSHS. Continuation of these programs will ensure the continued oversight of these important healthcare professions, maintain standards of practice for LMPs and MPTs, and protect the safety and welfare of the public.

Again, the ACR appreciates the opportunity to offer input and we thank you in advance for your consideration.

Sincerely,

e-signature

Bibb Allen, Jr., MD, FACR
Chair, ACR Board of Chancellors

e-signature

Richard A. Geise, PhD, FACR
Chair, ACR Commission on Medical Physics

Any Alternative or New Recommendations on This Agency: The American College of Radiology respectfully urges you to reconsider and to withdraw the staff recommendation to eliminate licensure programs for both medical radiologic technologists (MRTs) and licensed medical physicists (LMPs) by DSHS.

My Comment Will Be Made Public: I agree