

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#); [Brittany Roberson](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, June 09, 2014 12:37:53 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 09, 2014 11:00 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 9, 2014 - 10:59

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Geoffrey

Last Name: Ibbott

Title: Professor and Chairman, Department of Radiation Physics

Organization you are affiliated with: UT MD Anderson Cancer Center

City: Houston

State: Texas

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

My comments are in response to the recommendation from the Sunset Advisory Commission Staff Report to eliminate the Medical Physicist and Radiologic Technologist Licensure programs. An argument made by the staff is that eliminating the program would have "little impact on public health and safety". This argument is not supported by the facts. The impact on the health and safety of the public would in fact be significant, and was clearly demonstrated by (among other publications) a series of articles in the New York Times in 2010 by Pulitzer Prize-winning author Walt Bogdanich, entitled "Radiation offers new cures, and ways to do harm". The articles list a number of serious radiation errors, many made by individuals who were unqualified or were working in inadequate facilities, which resulted in serious injury or death of patients.

Another argument made by the staff is that regulation is provided by "another state or local regulatory program, or private sector accreditation". Several other states offer licensure for medical physicists or radiologic technologists, but none has reciprocity with Texas. Radiologic technologists are certified by the American Registry of Radiologic Technologists, while medical physicists are certified by the American Board of Radiology.

However, without a state licensure program, there is no requirement that medical facilities hire only certified medical physicists or registered radiologic technologists. It is true that institutions such as the MD Anderson Cancer Center value certification and recruit only properly qualified staff. But many smaller facilities, citing the higher salaries demanded by qualified individuals, are willing to sacrifice quality and safety to save costs.

Maintaining the licensure program might be the only way to assure the protection of patients and the provision of high-quality radiologic and radiation therapy services in some of these facilities. The State of Texas should not jeopardize health care by eliminating these programs.

Any Alternative or New Recommendations on This Agency: Retain the medical physicist and radiologic technologist licensure programs.

My Comment Will Be Made Public: I agree