

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, June 18, 2014 1:25:06 PM

---

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, June 18, 2014 1:21 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 18, 2014 - 13:21

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Stephen

Last Name: Klash

Title: CEO & President

Organization you are affiliated with: VT Medical Physics

City: Sachse

State: Texas

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

Taking away Medical Physicist licensure will hurt the Medical Physicist profession in Texas. Without licensure and the requirements for overseeing TMP license Medical Physicists, any physicist can come in to this state (with zero - 25+ years experience) and offer their services for non-brachytherapy related procedures (I am writing from a Therapeutic Medical Physicist standpoint). Without a minimum standard, facilities will look to hire the cheapest physicist, regardless of ability, thus threatening safety of patients. Prior to having the requirement that a detailed oversight program is to be in place for TMP physicists to work, LMP physicists would hire new graduates and stick them in jobs and never review their work (I have seen this in-state and know of a physicist who "oversaw" non-certified physicists in multiple states).

Without any requirements for CE's there is no reason for a physicist to bother keeping their skills up. Thus Texas would become like Arizona was years ago, in which anyone who has had some experience in a radiation related field (X-ray Tech, Rad Therapist) would hire themselves out as a physicist. This created a lot of problems during state inspections in AZ.

As far as other agencies' requirements or rules being enough for Medical Physicist to follow, thus rendering TX licensure remote, that is far from true. ACR, ASTRO and ACRO accreditation does not require a physicist to be present at a facility. Dosimetrist and therapists can perform the physicist duties. Only when brachytherapy procedures are performed is a physicist required to be present (this requirement is in the TX regulations).

Any Alternative or New Recommendations on This Agency: An alternative would be to have a thorough review of the Medical Physicist program and, if the

physicist(s) are doing a great job, their licensure renewal can be moved back from every 2 years to 5 years (keep the CE requirement at 24 hours). If it is determined that the physicist is doing a bad job during the year(s) prior to his/her licensure renewal, the renewal goes back to 2 years. Physicists who do an average job stay at 2 years (or 5 years) and a 2 year renewal physicist who does a bad job goes on a year-by-year review and could be banned for 2 years from having a license if he/she doesn't show improvement in their program to bring it up to an acceptable level. This could be published so facilities can utilize it in their hiring process.

My Comment Will Be Made Public: I agree