

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, June 30, 2014 4:36:43 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 30, 2014 3:10 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 30, 2014 - 15:09

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Joseph

Last Name: Mahoney

Title: Licensed Medical Physicist

Organization you are affiliated with: Grove Consulting Inc

City: Myersville

State: Maryland

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

Dear Sunset Review Committee,

As a licensed medical physicist in the State of Texas, I am deeply concerned by the consideration being given to possibly eliminating licensure for Medical Physicists.

Radiation safety, radiation measurement, and radiation treatment planning is a field that has an enormous impact on public health, and it little understood by the general population. Without maintaining a base level of qualification, few radiology personnel could distinguish an underqualified or unethical person claiming to practice medical physics until they cause a problem or fail to prevent a problem.

While Texas is currently one of the most restrictive states with regard to who is allowed to perform medical physics services, any perceived shortage is be better addressed by allowing junior physicists or physicist assistants to perform certain tasks traditionally done by a licensed physicist, rather than eliminating licensure altogether. The Texas Board of Professional Medical Physicists is already considering such measures.

The only reason to remove licensure for medical physicists would be to force down the expense of contracting a physicist by deliberately attracting people to the field with less training and understanding of radiation people who are all too happy to sell their signature. Certainly, anyone could go through the motions of calibrating sophisticated radiation producing equipment or designing treatment protocols, and facilities wouldn't know the difference until something went terribly wrong. Licensure exists to prevent as many accidents and unnecessary radiation exposure to the public. As many biological radiation effect take 15-30 to manifest. The long-term cost of improper oversight of medical radiation would be hard to evaluate until our children's generation.

Having a board of licensure ensures not only that Medical Physicists in Texas are properly trained, but it also holds them accountable for their professional behavior. In at least one other state that I have worked in, there exists a conflict of interest in which a Medical Physicist might be tempted to approve a malfunctioning piece of

equipment in order to avoid the displeasure of their employer or client. The threat of potential losing one's license is a powerful deterrent for such unethical behavior.

The role of both therapeutic and diagnostic licensed medical physicists are critical to public health. Elimination of licensure for these professionals would be a deliberate lowering of our standards for safety and quality of treatment with regard to medical radiation, and I strongly advise against it.

Sincerely,

Joseph Mahoney, MS, DABR

Licensed Medical Physicist

License Number MP10394

Any Alternative or New Recommendations on This Agency: I recommend addressing ongoing issues at the meeting in September.

My Comment Will Be Made Public: I agree