

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Medical Physicist Licensure
Date: Thursday, June 19, 2014 5:15:26 PM

From: Philip, Podimannil S
Sent: Thursday, June 19, 2014 2:10 PM
To: Sunset Advisory Commission
Subject: Medical Physicist Licensure

Dear Sunset review committee:

I am contacting you as a licensed medical physicist (MP0482) concerning the Sunset Staff Review published in May 2014. I am concerned that the information in the report does not accurately reflect the current environment of professional regulations and health care in Texas or the importance of licensure in protecting Texans from unnecessary exposure to radiation.

The report suggests that the programs are unnecessary because; (1) deregulation would have little impact on health and safety, (2) they cover professionals that operate in a highly regulated environment, (3) they have 'regulation' provided by another body or through private sector accreditation, and (4) they generate little regulatory activity.

I would like to address each of the areas to provide you with additional information that is not reflected in the report.

1. The report states "deregulation would have little impact on health and safety." Texas is very fortunate to be home to some of the most advanced imaging and treatment facilities in the world. In order for equipment used in these facilities and elsewhere in Texas to operate safely, highly trained individuals are required to assure the safe use of the equipment. Professional regulations are essential. Worldwide there have been some very serious injuries associated with radiation emitting equipment. Currently, licensed medical physicists are required to provide annual performance evaluations on the equipment to assure that they meet regulatory standards. Without such requirements these annual quality assurance measures might not be performed or be performed by others with less or no qualifications. Licensure in Texas requires medical physicists to meet educational and experience requirements and to pass an examination of their knowledge in the specialty field in which they intend to practice.
2. The report states the medical physicist licensure program is a "profession that operates in a highly regulated environment." The truth is that only a portion of the physics works are supervising by other agencies and accrediting bodies.
3. The third item in the report to be addressed is the view that medical physicists "have 'regulation' provided by another body or through private sector accreditation." I am not aware of any duplication of professional accountability for medical physicists in another regulatory body or accreditation that meets the equivalent standards for a licensed professional with the exception of

the MQSA requirements. In fact accreditation is not required for several types of medical imaging services or for radiation therapy. For some, imaging and radiation therapy accreditation is voluntary and does not require the medical physicists involved to have any specific qualifications. Without licensure there would be no requirement to use experienced, knowledgeable medical physicists. Also, it is only through licensure that all medical physicists practicing in Texas must meet continuing education requirements as some board certified individuals are not required to meet continuing education requirements.

4. The last rationale for sunset, medical physicists “generate little regulatory activity.” The Texas licensure law was written and enforced to protect citizens from individuals with little or no knowledge of radiation equipment from providing services that could in fact harm them. Licensed medical physicists must meet minimum educational and board certification requirements to obtain a license. To maintain their Texas license, medical physicists must meet continuing education requirements each renewal cycle (which is quite consistent with other medical professionals). Medical physicists are essential for patient safety in diagnostic imaging (radiology), nuclear medicine and radiation therapy. Professional licensure helps to assure that well qualified individuals provide these services

Sincerely,

Podimannil Samuel Philip
License number MP 0482