



June 25, 2014

Senator Jane Nelson, Chair  
Texas State Sunset Advisory Commission  
PO Box 13066  
Austin, TX 78711

Via email: [sunset@sunset.state.tx.us](mailto:sunset@sunset.state.tx.us)

Dear Senator Nelson:

The American Society for Radiation Oncology (ASTRO) is disappointed that the Sunset Advisory Committee's May 2014 Staff Report on the Department of State Health Services recommends discontinuing the licensing and regulation of radiologic technologists and medical physicists.

ASTRO is the largest radiation oncology society in the world, with more than 10,000 members who specialize in treating patients with radiation therapies. As the leading organization in radiation oncology, biology and physics, the Society is dedicated to improving patient care through education, clinical practice, advancement of science and advocacy. ASTRO's highest priority has always been ensuring patients receive the safest, most effective treatments.

Radiologic technologists (or radiation therapists) and medical physicists work as part of a highly trained radiation therapy team to administer daily radiation treatments under the radiation oncologist's prescription and supervision.

Licensed radiologic technologists administer ionizing radiation, a known carcinogen, in the lowest dose possible to patients to treat cancers and other illnesses. Unlicensed personnel do not have formalized education to administer low doses of radiation and still achieve effective treatments. Radiologic technologists are trained in how to properly position a patient to ensure that the radiation is delivered to its intended target. They maintain daily treatment records and, in conjunction with the medical physicist, check the treatment machines to make sure they are working properly. Certified radiation therapists go through a two- to four-year educational program following high school or college. By passing a special examination, radiation therapists may be certified by the American Registry of Radiologic Technologists. Licensure for radiologic technologists ensures that patients are being treated by individuals who have met education and certification standards to provide quality treatments.

Qualified medical physicists work directly with the radiation oncologist during treatment planning and delivery. They help ensure that complex treatments are properly tailored for each patient. Medical physicists are responsible for equipment software and systems acceptance testing, maintenance and commissioning, and for developing and directing quality control

AMERICAN SOCIETY FOR RADIATION ONCOLOGY

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programs for equipment and procedures. Proper equipment testing ensures that the prescribed radiation is accurately delivered. Medical physicists follow college with additional graduate training in medical physics to receive a master's or doctoral degree. In some cases, a medical physicist will complete an additional one- or two-year training program at a hospital. Medical physicists preferably are certified by the American Board of Radiology or the American Board of Medical Physics. Licensed medical physicists are held to a higher standard and are required to submit license renewal documentation of continuous medical education, similar to that of physicians.

Finally, licensure for radiologic technologists and medical physicists preserves the state's right to provide disciplinary action for individuals who may not treat patients according to professional standards or administer radiation correctly. Without licensure, the state cannot protect its citizens from untrained individuals.

ASTRO strongly supports licensing and regulation of radiologic technologists and medical physicists and believes that it is imperative that the State of Texas continue the licensing and regulation of these integral members of the radiation oncology treatment team. ASTRO strongly urges the Sunset Advisory Committee to retract their recommendation to discontinue the licensing and regulation of radiologic technologists and medical physicists. The state must act on behalf of its citizens to ensure they will continue to receive their cancer treatment from highly skilled, trained and certified personnel. If you have any questions or need additional information, please contact Cindy Tomlinson, ASTRO senior manager for security and safety, at 703.839.7366 or [cindy@astro.org](mailto:cindy@astro.org).

Sincerely,



Laura I. Thevenot  
Chief Executive Officer

CC: Representative Walter T. ("Four") Price, IV, Vice-chair, Texas State Sunset Advisory Commission