

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, June 27, 2014 9:06:48 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 26, 2014 2:51 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 26, 2014 - 14:51

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: William

Last Name: West

Title: President & Chief Medical Physicist

Organization you are affiliated with: West Physics Consulting, LLC

City: Dallas

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I do NOT support sunseting medical physicist licensure in Texas.

As a company providing medical physics services in Texas and throughout the U.S., my firm sees first-hand the improvement in patient safety and healthcare quality when qualified medical physicists evaluate image quality and radiation safety on diagnostic imaging equipment on a regular basis. I concur with the AAPM position on this matter and removing licensure for medical physicists will absolutely jeopardize the quality of medical care and patient safety in Texas. As other states are movings TOWARDS medical physicist licensure or already have it (such as California, New York and Florida), due to their own realization that having unqualified people doing this work results in poor quality and greater danger, it would be a crying shame and a disservice to the citizens of the state to head in the other direction on this issue. Medical physics is a highly technical profession, similar in complexity to specialist physicians, and existing accreditation programs are all still entirely voluntary for facilities and their credentialing requirements for medical physicists are still very spotty. For example, the largest accrediting body, The Joint Commission, currently has NO standards for medical physicists. As such, the contention that other bodies regulate this space properly is factually and grossly incorrect. In other states without either physicist licensure or very strong credentialing requirements, it truly is "the Wild West" and very low-qualified personnel conduct many of these activities, adding very little value for facilities or patients. Texas has the right approach today and needs to stick with it.

Our company recently placed a physicist staff member in Dallas and is planning to add more in the State if they are needed, so supply of qualified personnel is NOT an impediment right now. We have 5 Texas-certified physicists on staff and only 1 is currently needed in Texas, so we have 4 more who could be called upon at any time if demand were higher. Facilities saying they are having a hard time finding qualified physicists simply are not looking enough. We run the largest nationwide firm, serve all of Texas, and have ample availability and we know of other firms in the same situation.

Any Alternative or New Recommendations on This Agency: Keep the current requirements intact, which have served the State very well for many years.

This is NOT the type of profession where you want unlicensed or unqualified personnel performing services. Our profession is a "pinch point" in the delivery of quality medical care. That is, each diagnostic medical physicist typically tests tens or, for consultants, hundreds of imaging scanners per year, which in turn scan tens of thousands of patients. If even one facility uses an unqualified physicist or "so-called" physicist for this testing, the image quality and radiation safety of tens of thousands of patients will be affected. These complex scanners, which cost hundreds of thousands or millions of dollars, need to be checked by a highly-trained independent (not the manufacturer or servicer, who has a conflict of interest in identifying problems on their own product or from their service) physicist to protect the patients' interests in the State. Licensure is absolutely necessary to ensure this is done expertly and properly. Accreditation standards are getting better, but they are still not close to being able to take the place of the existing Texas Medical Physicist Licensure process.

My Comment Will Be Made Public: I agree