



Texas Radiation Advisory Board

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July 20, 2002

Lee S. Anderson, M.D., President
Texas State Board of Medical Examiners
P.O. Box 2018
Austin, TX 78768-2018

Re: 22 TAC Chapter 193.11, Proposed Rules, Standing Delegation Orders

Dear Doctor Anderson and Board Members:

At our meeting earlier today, the Medical Committee of the Texas Radiation Advisory Board discussed your proposed rules pertaining to the use of lasers and more specifically the sections dealing with standing delegation orders.

While we whole-heartedly agreed with the overall plan, we did have one area of some concern. When addressing training for physicians utilizing lasers a minimum number of hours of initial training in laser technology (24 hours) as well as a minimum number of annual continuing education hours in that field (8 hours) were required. However, when discussing the training of the assistants, the topics for initial education were listed with no minimum number of hours delineated. Eight hours of annual continuing education was required.

The members of the Medical Committee felt that to ensure adequate training in laser technology and to aid in evaluation of training during inspections of these facilities, a minimum number of hours of initial training for assistants should be required. The Texas Radiation Advisory Board met later on Saturday, agreed with this assessment and asked that I send a letter to you requesting that addition. We are not proposing a particular number of hours, but merely that some minimum number be established. We are aware that ANSI standards address this issue. They may be of some help if you need additional data.

We appreciate the opportunity to provide input on the rule and hope that our comments are of some assistance. We look forward to working with you on any other issues which may pertain to radiation and radiation safety.

Sincerely,

Original signed

W. Kim Howard, MD
Chair, Medical Committee
Texas Radiation Advisory Board