



The Ohio Society of Radiologic Technologists

Sunset Review Committee

Radiation Advisory Committee

May 10, 2016

Chairman Jordan and members of the Sunset Review Committee, thank you for the opportunity to provide testimony in opposition to the sunset of the Radiation Advisory Council. The Ohio Society of Radiologic Technologists (OSRT) is the professional association for the Radiologic Science and Medical Imaging technologists in Ohio and an affiliate of the American Society of Radiologic Technologists.

It is apparent from the February 23, 2016 testimony presented by the Ohio Department of Health that the department believes the Radiation Advisory Council (RAC) provides a valuable service. It is also clear that the RAC is funded through radiation registration and licensee fees. These two important points indicate that the current structure of the RAC is working well and is fiscally sound. The Ohio Society of Radiologic Technologists concurs that the RAC has been a valuable asset to the healthcare community.

The department further acknowledges that "radiation control is a highly sensitive public health issue." The use of radiation transcends many professions and areas including research institutions, industrial testing, manufacturing, veterinary and medical diagnosis, medical treatment and clinical trials. The utilization of the Radiation Advisory Council has assured that rules are workable to all the areas of interest and provides radiation safety in these varied environments.

The sole reason presented for recommending the sunset of the RAC is to transition these duties to an ad hoc committee system. The OSRT is opposed to this action.

The elimination of the RAC would result in a less formalized process which the OSRT considers less inclusive and contrary to an environment open to the communities of interest. The RAC holds four quarterly public meetings occurring on the third Friday of January, April, July, and October each year. The creation of an ad hoc committee system would make it more difficult for interested parties to attend as the dates and times would be set as needed. The membership of the RAC is published with the terms of appointment and the criteria for appointment is clearly prescribed by statute. An ad hoc committee would not provide this level of assurance and transparen-

cy. Additionally, with the elimination of the RAC there would be no statutory requirement in place that would require the use of ad hoc committees. That said, if the RAC was eliminated, we do believe the current Department of Health leadership would continue to reach out to stakeholders. However, future leaders of the department may not take that position and this is a serious concern for our membership and our patients.

The OSRT concurs with the Ohio Department of Health that the RAC has been valuable. In addition, the OSRT has found the RAC to be transparent and open to input from the radiation community. The transition to an ad hoc system would be detrimental to participation by the communities of interest and could make the process less accessible for those wishing to participate. The Ohio Society of Radiologic Technologists believes that the sunset of the Radiation Advisory Council would decrease the transparency of the rule making process and make it more difficult for individuals to participate and provide input into the process. The process would seem more secretive and less transparent. Therefore, we strongly oppose sunseting ORC 3748.20, the Radiation Advisory Council.

Thank you for your consideration.