

**Testimony in Support of SB 236 before the  
Senate Health, Human Services and Medicaid Committee  
Chairman Dave Burke**

**By  
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Chairman Burke, Vice-Chair Huffman, ranking member Antonio and members of the Senate Health, Human Services and Medicaid Committee, my name is Paul Geis and I am a medical physicist at University Hospitals in Cleveland. I am involved in the technical side of radiation therapy for our health system's cancer patients. I am also a member of the Radiation Generating Equipment Committee (REC) that provides guidance to the Ohio Department of Health (ODH) on radiation regulations and serve on the Board of the Ohio Radiological Society.

Thank you for the opportunity to testify today in support of SB 236. I want to thank Senator Huffman for sponsoring this legislation. My comments are specifically in reference to proposed changes in the bill contained on page 4.

Senate Bill 236 makes a simple, but important change to Ohio law. For years, Ohio has been tied to a set of regulatory recommendations referred to as the Suggested State Regulations (SSR) - more commonly called the "SSR's".

For the most part, the SSR's make sense and are adopted without issue in Ohio. Occasionally, however, there are suggested rules that add an unnecessary burden and sometimes unreasonable cost to health care providers and other users of radiation generating equipment. Often in these cases, the advisory and medical community agree the suggested rules don't make sense.

But, because the statute is clear that ODH shall use standards no less stringent than the SSRs,

the director is forced to adopt them. The change we're seeking would allow ODH to "consider" the SSR's for adoption, rather than require it.

We expect little change from the current rule revision process. Ohio's Radiation Protection program has been recognized as one of the best in the country. Both the Radiation Generating Equipment Committee and its parent Radiation Advisory Council that serve ODH have radiation experts from all over Ohio: radiologists, physicists, and other professionals who understand the risks of radiation use and how to mitigate them. These groups review every rule with ODH management.

We believe there are sufficient checks and balances in the current review process. The mandate to follow the SSR's adds nothing but cost to radiation safety practices in Ohio.

Thank you for the opportunity to testify in support of Senate Bill 236. I would be happy to answer any questions you may have.

Respectfully submitted,

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