

**Testimony of Michael Cox**

Owner and President, Unicon Medical Physics LLC

Before the Ohio House of Representatives General Government Committee

November 13, 2025

Re: Addressing the proposed HB-59 redefinition of "Certified Radiation Expert"

Good morning, Chair Ray, Vice Chair LaRe, Ranking Member Brent, and esteemed members of the House General Government Committee. My name is Michael Cox, and I am the Owner and President of Unicon Medical Physics, a small business specialized in diagnostic and medical health physics based in Cincinnati and operating throughout all of Ohio. I am also an Ohio Certified Radiation Expert, am board-certified by the American Board of Radiology, and am a member of the American Association of Physicists in Medicine and the Health Physics Society.

The goal of "revising and streamlining occupational regulations to better accommodate the state's workforce" (H. B. No. 59) is admirable, and deregulation is good when eliminating professional and administrative barriers without compromising safety and excellence in the workforce. Unfortunately, the proposed redefinition of "Certified Radiation Expert" (CRE) would significantly increase, not reduce, the professional barriers for current CREs by requiring that all be certified by the American Board of Radiology or the American Board of Medical Physics.

This redefinition would eliminate the current education and experience pathway, as well as other certifying boards, making approximately one third of current diagnostic and mammographic CREs in Ohio ineligible, and consequently facing either unemployment or finding their scope of practice significantly reduced. Furthermore, the healthcare costs to simply maintain existing radiation quality control programs would increase proportionally due to the reduced numbers of qualified individuals available.

These consequences are very real to me, since 3 of my 4 full-time employees would be negatively impacted by this redefinition, and I would be forced to either slash salaries or even positions as a result of these employees being defined as unqualified to do the work they have been doing with excellence for decades. These consequences to us would have an outsized and significant impact on healthcare in Ohio through the dozens of hospitals, including several major healthcare systems, and hundreds of urgent cares, clinics, and specialty offices that we service. This demonstrates how important my 3 non-board-certified, but very qualified, physicists are to ensuring safe and effective medical imaging in Ohio.

Finding new employees who could meet the proposed redefinition would also be a challenge since there is a national shortage of physicists possessing these board certifications. Consider as an example the American Association of Physicists in Medicine, which is the primary professional organization for medical physicists practicing in the United States. Of its current 9948 members, only 46% possess one of the certifications required by the proposed redefinition, while 47% of its members possess no certifications at all.

One solution would be to simply allow all current CREs to be grandfathered into the new definition. However, this would merely postpone, not eliminate, the negative consequences just described.

The best solution, which both avoids the negative outcomes while still accomplishing the goal of streamlining occupational regulations, would be to keep the current education and experience pathway in the proposed CRE redefinition and make individual facilities responsible for verification and documentation in lieu of Ohio issuing certificates. Inspectors could then look over the documentation during inspections without Ohio being responsible for managing an entire certification program for radiation experts.

Thank you, Chair Ray, Vice Chair LaRe, Ranking Member Brent, and members of the Committee. I would be happy to answer any questions at this time.



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