

Kyle C. Luttrell, MS  
17875 Armbruster Rd.  
Grand Rapids, OH 43522  
Kyle@amprinc.com  
Ohio CRE: #531

11-Nov-2025

Ohio Department of Health  
246 North High Street  
Columbus, OH 43215

Subject: Concerns Regarding New Board Certification Requirement for Certified Radiation Experts

Dear Ohio Department of Health,

I am writing to express my concern about the new law (HB 59 Sec. 3748.01 B) requiring board certification for all Certified Radiation Experts in Ohio. While I fully support the Department's mission to ensure the highest standards of safety and quality in radiation services, I believe this new requirement places an unnecessary hardship on long-serving, experienced professionals who have been certified and practicing competently for decades. Many leading accreditation agencies (ie. American College of Radiology, The Joint Commission, Intersocietal Accreditation Commission) do not require a medical physicist to be board certified to perform physics services, and alternative pathways to certification are sufficient.

I have worked as a certified radiation expert in Ohio for nearly 10 years. Throughout that time, I have maintained all required continuing education, upheld rigorous professional standards, and contributed to the safety and effectiveness of radiation practices across our state. The newly mandated board certification, however, was not part of the original radiation expert certification process, and retroactively imposing this requirement disregards the extensive experience and proven competency of established practitioners.

This change could unintentionally disenfranchise many qualified experts, reduce the available workforce, and disrupt services across hospitals, clinics, and other facilities that rely on experienced radiation professionals for accreditation and quality control.

I respectfully urge the Ohio Department of Health to consider implementing a grandfather clause for currently certified and practicing radiation experts. Such a provision would maintain the Department's commitment to safety and excellence while recognizing and preserving the expertise of long-standing professionals who have served Ohio faithfully for many years.

Thank you for your attention to this important matter and for your continued efforts to support both patient safety and professional integrity in our field.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Luttrell MS', with the initials 'MS' written in a smaller font to the right of the signature.

Kyle C. Luttrell, MS  
Medical Physicist  
OH CRE: #531