

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, November 17, 2016 12:15:13 PM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, November 17, 2016 11:56 AM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: Kristin

Last Name: Barron

Title:

Organization you are affiliated with:

Email:

City: San Antonio

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I am opposed to the recommendation listed under Issue 3 to abolish the limited medical radiologic technologist certification. According to American Society of Radiologic Technologists (ASRT) limited x-ray machine operator's curriculum, "the knowledge and cognitive skills underlying the intelligent performance must be equivalent to that of the general radiographer." LMRT's have didactic and clinical training equivalent to a minimum of 1500 hours. LMRT programs also include 600 of clinical hours in the field with direct patient care. It is impossible for NCT's to have the level of training in 120 hours to provide a high level of quality care as it relates to accurate patient radiographic positioning, radiation safety, and patient protection. In addition, without a clinical training requirement or competency assessment, there are no quality controls in place to evaluate the level of clinical competency and provides a lower level of care which can compromise the overall safety of the patient. Every patient deserves to have the most qualified and trained radiographers performing diagnostic radiographic examinations.

Any Alternative or New Recommendations on This Agency:

Streamline internal processes with the TMB in regards to licensure. 1) Do not require applicants to submit a request to take the LMRT Exam. Auto generate approval once a temporary license is issued. 2) Make the LMRT exam pass or fail for all of the modules at once, vice being able to pass different sections of the exam which is not only a nightmare for the TMB but for employers as well. 3) There are 3 levels of background checks. 1. FBI, 2. NPDB Self Query and 3) the From L (Professional History ) required before a permanent license is issued from the permanent licensure process. The FBI back ground check should be sufficient. 4) Do not make it so difficult to get court/police documents for those with backgrounds. Most agencies will not send sealed records directly to the TMB unless the TMB requests them.

Applicants are encouraged to report all infractions, however getting the paperwork in the manner the TMB requires is very difficult. 5) Create a grading process that allows the TMB to grade the LMRT exam electronically and immediately vice having the TMB to get the data from the ARRT, and then decide if a candidate passed or failed. Normal waiting time for a candidate to get exam results back is two weeks. This is unsatisfactory with the technology we have at our fingertips.

Taking away the LMRT licensure will only encourage employers to use loop holes such as the Hardship Exemption Title 25, Part 1, Chapter 140, Subchapter J, Rule 140.520 of the Texas Administrative Code which allows for persons to perform radiologic procedures without any formal training thus causing an increase of paperwork (administrative burden) that will be incurred from the Hardship Exemption application process, which is the chief complaint in the reasons for abolishing the LMRT Certification.

My Comment Will Be Made Public: I agree