

From: [Sunset Advisory Commission](#)
To: [Brittany Roberson](#); [Janet Wood](#)
Subject: FW: Sunset Advisory Commission Staff Report - DSHS
Date: Friday, June 06, 2014 4:00:51 PM

From: Christi Carter
Sent: Friday, June 06, 2014 3:45 PM
To: Sunset Advisory Commission
Subject: Sunset Advisory Commission Staff Report - DSHS

Ms. Teleki,

My name is Christi Carter and I am an educator in a Radiologic Science Program and also an MRT. I am also one of the 400 surveys that you received regarding the DSHS in November and I have many questions regarding the State's plan on regulating the personnel that will be operating radiation producing equipment.

The Texas Administrative Code Title 25 Part 1 Chapter 289 Subchapter E paragraph 5 states that "Individuals who operate radiation machines for human use shall meet the appropriate credentialing requirements of rules issued in accordance with the Medical Radiologic Technologist Certification Act, Texas Occupations Code, Chapter 601." But since you have proposed the Discontinuation of this Program, how will the State regulate who will operate these machines? There will be no need to worry about our hospitals or imaging centers as they are also under The Joint Commission rules. But there will be nothing that will regulate some of the emergency clinics and the thousands of doctor's offices across the state. These offices will be able to allow anyone from the receptionist to the lab tech to the medical assistant to take an x-ray. Without proper education, the public will be put at risk by those individuals not trained in radiation physics, radiographic positioning techniques, radiation safety, etc.

If the Commission follows through with this discontinuation, there will be no governance of individuals operating radiographic equipment. To prevent potential harm to citizens of the State of Texas, I believe the legislators must amend the above sentence from the TAC 25 to read "Individuals who operate radiation machines for human use shall be registered by the American Registry of Radiologic Technologists, students of an accredited radiography program leading to an ARRT certification or be licensed by the State of Texas as a doctor of medicine, osteopathy, podiatry, dentistry or chiropractic".

Has the Commission considered those that are currently taking x-rays on members of the community that are not regulated by a national body? Have you reviewed the Non-Certified Technician licensure? or the Limited-Medical Radiologic Technologist? The LMRT and the NCT have no national governing body to license.

Please consider my concerns and feel free to contact me if you would like to discuss this further.

Christi Carter