

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, November 30, 2016 8:10:27 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, November 30, 2016 5:59 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: Tyrone

Last Name: Carter

Title: Practice Administrator

Organization you are affiliated with: Urgent and Family Care

Email: tcarter@austinurgentcare.com

City: Austin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

I was just informed that there are recommendations for the TMB to LMRT certifications and allow work to be performed by MRT's and NCT's. From my understanding the NCT program only requires the students to complete 120 hours of classroom work and does not have a clinical component. LMRTs have 1500 hours of training; 900 hours didactic and 600 clinical training.

The LMRT program also includes 600 hours of clinical hours in the field with direct patient care which is very beneficial especially in this field. We have been utilizing LMRT's in our facility for the last 10 years because they are well trained regarding patient care and the 600 hours that they do in our facility as a intern provides them with the actual hands on experience to prepare them for success.

With that being said; UFC is 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."

As I mentioned previously; 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. I hope that you will reconsider this action as it will effect so many health organizations and not to mention hinder patient care.

Thank you for your time.

Any Alternative or New Recommendations on This Agency: Keep the LMRT program.

My Comment Will Be Made Public: I agree