

November 28, 2016

Dear Sunset Commission:

I am Candice Donohue from The College of Health Care Professions, and serve in the role of Externship Coordinator. We have been in business in the Dallas area for 25 years.

Please accept this letter in opposition of the recommendation as identified by Issue 3 of the Sunset Advisory Commission to abolish the limited license certificate and programs and to eliminate the dual registration for the NCT's.

There are many concerns regarding this recommendation to abolish LMRT's in the state of Texas and allow the work to be performed by MRT's and NCT's. Primarily, the main issue is related to quality of patient care and safety of the patient. Medical Radiologic Technologists (MRT's) and Limited Medical Radiologic Technologists (LMRT's) are both health care professionals that require extensive didactic coursework, clinical practicum experience, and a board licensure examination. Non-certified Technicians (NCT's) are not licensed professionals and do not have the required coursework and training to perform radiographic examinations. According to the ASRT Position Statements (June 2016), "The American Society of Radiologic Technologists opposes the employment or utilization of uncertified or unlicensed individuals to administer ionizing or nonionizing radiation for diagnostic or therapeutic procedures. This is a breach of responsibility of the health care industry in providing quality patient care."

1. Education and Training

- a. The NCT program only requires the students to complete 120 hours of classroom work and does not have a required clinical component. The lack of classroom training and clinical competency assessment does not align with educational and clinical standards related to the field of radiography.
- b. LMRT's have didactic and clinical training equivalent to a minimum of 1500 hours: 900 hours didactic and 600 Clinical training. The training includes intense academic focus in Radiation Protection, Equipment Operation and Quality Control, Image Acquisition and Evaluation, Patient Care and Education, and Radiographic Procedures.

2. Patient Safety

- a. Patient Comprehensive educational programs such as the LMRT and MRT provide the educational foundation that is needed regarding radiation safety, radiation protection, image acquisition, patient positioning, anatomy and physiology, and image evaluation.
- b. Patient safety can be impacted by poor technique, inadequate positioning which can lead to repeat examinations and jeopardizes quality health care. NCT's do not have a clinical training requirement or competency assessment which results in no quality controls in place to evaluate the level of clinical knowledge, clinical competency, and provides a lower level of care which can compromise the overall safety of the patient.

3. Facility Demand

- a. Limited medical radiologic technologists are in demand and employed by urgent care facilities and free-standing imaging centers as well as other medical facilities, and it is believed that elimination of this licensure will have a negative impact on the community.

**Every patient deserves to have the most qualified and trained radiographers performing diagnostic radiographic examinations.**

Sincerely,

