

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#); [Brittany Roberson](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 05, 2014 12:45:45 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 05, 2014 11:46 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 5, 2014 - 11:45

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Gary

Last Name: Morrison

Title: Radiologic Technologist

Organization you are affiliated with: TSRT, ASRT, ARRT, AEIRS

City: Wichita Falls

State: Texas

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

3 The Unmanageable Scope of DSHS' Regulatory Functions Reduces Needed Focus on Protecting Public Health

If the deregulation of radiologic technologists is permitted to occur, the only assurance of a qualified individual delivering this potentially harmful ionizing radiation will be found in Texas prisons. It seems that the prison system will be the only place where a properly credentialed individual will be legislatively-mandated if this deregulation is permitted to occur.

Your report erroneously states that there is adequate credentialing & accrediting oversight of the profession. Given the number of accrediting organizations out there, oversight is very hit or miss. The main accrediting organization, The Joint Commission (TJC), at this time has no requirement of hiring only radiologic technologists credentialed by the American Registry of Radiologic Technologists (ARRT). They are initiating this requirement next year but that will only impact facilities accredited by them. It will have no impact on facilities that are only Medicare/Medicaid-accredited or who are accredited by some other mechanism or for those who are not accredited at all.

It seems strange to me that an athletic trainer will have to be licensed by the state but not the person responsible for safely delivering ionizing radiation to YOUR loved-ones - radiation that could cause serious harm, deep tissue burns & genetic damage that could affect future generations such as your grandchildren or great-grandchildren.

Any Alternative or New Recommendations on This Agency: Leave it as is or transfer it to its own Board of Radiologic Technologists Examiners under the Board of Medical Examiners as we tried to have legislated in the past.

My Comment Will Be Made Public: I agree