

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, November 17, 2016 1:49:06 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, November 17, 2016 1:09 PM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: Amber

Last Name: Harris

Title: LMRT Program Director

Organization you are affiliated with: College of Healthcare Professions

Email: aharris@chcp.edu

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: We are 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: Abolish NCT licensure, as the knowledge and training does not meet radiologic professional standards, nor is it conducive to providing quality patient care and radiation safety to the general public.

My Comment Will Be Made Public: I agree