

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, November 17, 2016 1:48:30 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, November 17, 2016 12:49 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: Marilyn

Last Name: Ishler

Title: Director of Education

Organization you are affiliated with: College of Health Care Professions

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State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I am opposed to the recommendation listed under Issue 3 to abolish the limited medical radiologic technologist certification both from an educational perspective and from a personal safety issue. 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 include 600 clinical hours with direct patient care. It is not possible 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.

Without a clinical training requirement or competency assessment, there are no quality controls in place to evaluate the level of clinical competency thereby providing 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: Maintain the current limited license certificate.

My Comment Will Be Made Public: I agree