

From: [Sunset Advisory Commission](#)
To: [Brittany Roberson](#); [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 05, 2014 10:03:37 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 05, 2014 9:12 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 - 09:11

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Jessyca

Last Name: Wagner

Title: Radiologic Technologist, Assistant Professor

Organization you are affiliated with:

City: Ponder

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or

Opposed: I am writing to oppose Issue 3 in the May 2014 report. As a national and state registered medical radiologic technologist, I highly disagree with the decision to remove the state licensing for MRTs and medical physicists.

In the report it is stated as being low risk to the public, and this is true, as long as there are qualified, nationally registered technologists performing the exams. If the state regulations are going away, there needs to be a condition of the technologists being nationally registered through the American Registry of Radiologic Technologists (ARRT). Limited license technicians and non-commissioned technicians are not given the proper training to safely administer radiation to the public without having some kind of standard and regulating body. It cannot be left up to the hospitals to require regulation, because not all technologists work in hospitals. There are mobile companies, technologists in doctor's offices, etc. These technologists don't have a governing body overseeing their regulation and licensing, unless they are ARRT certified. Also, hospitals that are accredited by the Joint Commission are required to have ARRT registered technologists, but not all hospitals are accredited by the Joint Commission and those that are accredited by other agencies may not hold the same standards. The bottom line is that even if the state gets rid of the state license itself, there needs to be a regulation and standard that all technologists in the state of Texas must be ARRT registered and no longer allow non-commissioned or limited licensed technicians to practice in the state without receiving their degree and ARRT registry. The ARRT has made it a policy beginning January 1, 2015, all ARRT candidates must have an academic degree of associates or higher to be registry eligible. This is a standard that should be upheld throughout every state and require that all techs must be ARRT registered. Also, medical physicists are responsible for ensuring that the equipment used to administer the radiation to the public is within functional limits and safe for use. This should definitely require a license and standardization in order to protect the public and ensure the physicists working on the equipment are qualified and up to date.

Any Alternative or New Recommendations on This Agency:

I propose one of two things:

1. Transition the MRT and medical physicist licenses over to the TDLR if they can no longer be held by the DSHS so that there can be continued monitoring and regulation.
2. Set standards to be upheld if the license is dissolved, such as the aforementioned ARRT standards, etc.

My Comment Will Be Made Public: I agree