

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, May 01, 2018 3:30:58 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Tuesday, May 01, 2018 3:05 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: Troy

Last Name: Moran

Title: Director of Health Sciences

Organization you are affiliated with:

Email:

City: Fort Worth

State: Texas

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

I SUPPORT the TMB Staff recommendation, found on Page 5, to create a medical radiologic technology Radiologist Assistant (RA) certificate. Which will establish in statute an advanced-level medical radiologic technologist (MRT) certificate and define the term "radiologist assistant" as an individual who holds an advanced-level MRT certificate. Require that radiologist assistants only practice under the supervision of a radiologist, and require the Board of Medical Radiologic Technology, with approval of the Medical Board, to adopt rules for education and training, practice restrictions, and supervision levels required for radiologist assistants.

In the 2016 Sunset Review of the Texas Medical Board (TMB), the Texas Sunset Commission (TSC) unanimously approved a decision regarding recognition of the radiologist assistant (RA).

The statutory amendment for this recommendation were added to HB 3040 and SB 315 for the 85th regular session of the Texas Legislature. The previously approved TSC recommendation for the RA should again be considered and previously submitted statutory language added to legislation in the 2019 Texas Legislative Session.

RAs are often unable to obtain credentials at Texas hospitals because they are not recognized in statute like other healthcare professionals working in a hospital. Hospitals cannot distinguish between the education level, qualifications, supervision levels, and scope of practice because RAs are not recognized in statute or rules. There are also no set disciplinary procedures for RA who violate ethical or practice standards and no way to track the RA's supervising radiologist or radiology group."

Any Alternative or New Recommendations on This Agency:

In order for Texans who are formally educated to be more than just a radiographer, but not fortunate enough to

become radiologists, this recognition would allow for the hiring of well trained, well educated, radiology assistants. Additionally, these individuals would contribute to the states infrastructure rather than taking their six-figure salaries and families elsewhere. Moreover, this would allow radiologists and hospitals alike, the ability to properly bill for the services of RAs. That is what it has all come down too and why radiology groups/hospitals are not able to onboard highly trained professionals specializing in diagnostic imaging. For some unknown reason, people seem to think that PAs and/or nurses are qualified to deliver high doses of radiation or have been trained in areas of radiation safety, while PAs and nurses alike have no clue as to what they are doing. Shame to those who think they know what is best in the delivery of ionizing radiation by those not formally educated in our profession.

Keeping in mind that most hospital growth is due to the aging population and specialized procedures are increasing across the country as a sign of baby boomers living longer lives. There is a looming shortage of radiologists, technologists, and educators on the horizon and if something is not done soon to address this matter the population will suffer. All of this in addition to the normal procedures that are needed on a daily basis.

I hope administrators/law makers realize the importance of not having a plumber do their taxes. Well, the same goes here. Only specially trained individuals in the delivery of ionizing radiation should be allowed to "hit the button."

My Comment Will Be Made Public: I agree