

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 10:02:42 AM

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

From: sundrupal@capitol.local [mailto:sundrupal@capitol.local]
Sent: Thursday, June 05, 2014 9:41 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 - 09:40

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Robert

Last Name: Comello

Title: Associate Professor

Organization you are affiliated with: Midwestern State University

Email: robert.comello@mwsu.edu

City: Wichita Falls

State: Texas

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

I have just read Issue 3 and would like to comment against the deregulation of Medical Radiologic Technologists and Medical Physicists. I would argue that deregulation of these two programs will have a large impact on public health and safety. It is stated that a reason for this decision is these occupations work in an environment that is already highly regulated by accrediting bodies. That is not entirely true. Hospitals accredited by the Joint Commission are required to have ARRT registered technologists.

Not all hospitals are accredited by the Joint Commission. You must be diligent in knowing what other hospital accrediting agency require regarding these occupations. Also, outpatient clinics, doctor's offices and mobile medical imaging companies are few examples where accreditation does not exist but the radiographer and physicist work.

A most compelling reason to not deregulate is the fact that a registered radiographer is taught how to take a radiograph by using the least amount of ionizing radiation for a diagnostic image. Registered radiographers must take classes in Radiation Biology to understand interactions with ionizing radiation that occur within the body which could be harmful. Registered radiographers also must take a course in Radiation Protection. This course conveys all the necessary information that will be useful in protecting the patient, radiologist and the radiographer from harmful radiation which, in turn, keeps exposure to a minimum. These two courses along with the other courses the radiographer must take to become registered results in an increase in not only public but patient health and safety as well. What should be the focus of concern is the over use of Limited X-ray Machine Operators (LXMO's) and Non-certified Technicians (NCT's). These two examples administer ionizing radiation but do not have the intense training and knowledge required of a registered technologist.

I did address medical physicists, too. I would like to say that this is a very important occupation and not all of them work in highly regulated accredited hospital. Some can be independent contractors. The physicist determines if a machine is emitting the correct amount of radiation that the radiographer has chosen for that particular study. I do not need to go into why that is important.

I ask the Advisory Commission to open up meaningful dialogue regarding these issues I have addressed before making a decision.

Any Alternative or New Recommendations on This Agency:
I recommend the Commission consider the following:

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.

Set appropriate standards to be upheld if the license is dissolved.

My Comment Will Be Made Public: I agree