

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, November 17, 2016 1:48:51 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, November 17, 2016 12:53 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: Vicki

Last Name: Sanders

Title:

Organization you are affiliated with:

Email:

City: Wichita Falls

State: Texas

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

Issue 3- Remove LMRTS and eliminate redundant registries for NCTs.

I support the elimination of multiple registries for the NCT into one registry under the Texas Medical Board and the advisory board of the Texas Board of Medical Radiologic Technology.

I am not sure if the Texas Sunset Commission is aware, besides the chiropractic board and podiatric registries for NCTs, there is also a registry for NCTs under the Texas Board of Nursing. I believe that this NCT registry and any other NCT registry, should be placed under the TMB to reduce waste and eliminate redundancy of NCT certifications.

Any Alternative or New Recommendations on This Agency:

I would also like the TSC to consider adding the definition of the "Radiologist Assistant" (RA) and "Radiologist" to the current OC 601 statute with instructions for the TBMRT and TMB to make rules regarding the RA.

RAs and have obtained a Bachelor's or Master's degree through a recognized and accredited university program, as well as clinical training under a radiologist preceptorship.

- RAs works under the supervision of a radiologist to provide safe, efficient care in radiology, and can be especially effective in underserved and rural areas of the state where access to care is a concern.

RAs can be defined as "Registered Radiologist Assistants certified by the American Registry of Radiologic Technologists (ARRT) or Radiology Practitioner Assistants certified by the Certification Board for Radiology Practitioner Assistants (CBRPA) who work under the supervision of the radiologist."

An amendment adding the definitions of RA and radiologists will not increase the number of outstanding licenses. RAs already hold an MRT license, so this change would simply allow the RA to be recognized in statute as and the TBMRT to make rules regarding the RA.

The problem RAs face is that they 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.

Thirty-one (31) other states have recognized RAs, and has come before the Texas legislature in the past 5 legislative session as address in the TMB self-study (p.145) this amendment would be supported by the Texas Society of Radiologic Technologists, the American Registry of Radiologic Technologists, American Society of Radiologic Technologists, Society of Radiology Physician Extenders, and Texas Radiological Society. These organizations represent doctors of radiology, as well as 24,439 medical imaging and radiation therapy technologists in Texas.

Please consider adding the definition of "radiologist assistant" and "radiologist" to the current OC 601 statute. Thank you for your consideration.

My Comment Will Be Made Public: I agree