

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, December 06, 2016 8:10:28 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, December 05, 2016 7:23 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: Jody

Last Name: Standiford

Title:

Organization you are affiliated with:

Email:

City: San Antonio

State: Texas

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

I am strongly opposed to the recommendation to abolish the limited medical radiologic technologist certification. According to American Society of Radiologic Technologists, limited x-ray machine operator's curriculum states that "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 900 hours of classroom training and 600 clinical hours in the field with direct patient care. It is impossible 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. Also, without a clinical training requirement or competency assessment there are no quality controls in place to evaluate the level of clinical competency and provides a lower level of care which can compromise the overall safety of the patient. In addition, LMRT's are required to complete 12 hours of continuing education every 2 years to stay informed of the constant changes in radiologic technology and patient care. NCT's are not required to do this which will also compromise patient care. Every patient deserves to have the most qualified and trained radiographers performing diagnostic radiographic examinations. In fact, their lives depend on it.

Any Alternative or New Recommendations on This Agency:

Do not abolish the LMRT certification. The LMRT program provides the comprehensive educational foundation that is needed regarding radiation safety, radiation protection, image acquisition, patient positioning, anatomy and physiology, and image evaluation. All these things are needed to provide quality patient care. NCT's are not trained in this way which can jeopardize patient safety and effect patient diagnosis and treatment. Also, LMRT's are in demand and employed in urgent care facilities, free standing imaging centers, and local doctors offices. These facilities need employees that can safely provide high quality services without the high salary an MRT demands. LMRT's are a valuable asset to the medical industry.

My Comment Will Be Made Public: I agree