

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, December 09, 2016 1:04:09 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, December 09, 2016 10:44 AM
To: Sunset Advisory Commission
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: William

Last Name: Tobin

Title: Radiology Director

Organization you are affiliated with: East Texas Medical Center

Email: btobin@etmc.org

City: Tyler

State: Texas

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

re: NCT technologists currently enrolled in a Rad tech 2 year program & changes eliminating them from our work
force;

This letter was written to the TMB in May and submitted 3x's.
I've not yet had response to any of my inquiries.

Texas Medical Board
P.O. Box 2029
Austin, TX 78768-2029

To whom it may concern,

I'd like to bring to your attention a detail as it relates to licensure that your division may or may not be aware of. In the transition of the radiological technologist licensure to fall under the jurisdiction of the Texas Medical Board, there may have been an omission of a technologist category that had previously existed with Texas Department of State Health Services MRT program.

In the past, East Texas Medical Center had been able to supplement our radiology department staff with NCT credentialed technologists.

In my experience, there have always been two categories of NCT technologists.

Currently the Texas Administrative Code Rule 140.518 Mandatory Training Programs for Non-Certified Technicians seems to (only) outline the certificate program graduate.

It primarily focuses on classroom hours. It does not mention clinical hours.

Also note that it does require dark room and processing of film education. In most if not all facilities, film and wet processing has been eliminated with the advent of electronic imaging. Also, the application itself requests a copy of the certificate of completion.

We do not employ the certificate NCT technologists. The certificate NCT technologist does not fit our institution and may be better geared towards a physician's office or a clinic.

We have however employed (another type of) NCT licensed individuals who completed their first year of the two year program in the Tyler Junior College Radiologic Technology program. It's been a requirement that they remain enrolled while working towards their MRT license.

After their first year, they were able to obtain NCT licensure through the Texas Department of State health services MRT program by submitting a letter from the school delineating their training and completing the appropriate application. Please see the attached letter from Nathan Stallings, program chair of Tyler Junior College radiologic technology program.

This NCT status was temporary and would lead to permanent and long-term employment as the employee achieved their MRT licensure. It became more of an externship for them to polish their clinical skills; all while working with MRT licensed and ARRT registered technologists.

We considered this our entry-level on our clinical ladder. It's worked well for us retaining long term technologists and circumventing the technologist shortage.

It seems that the ability to continue with this type of career path for our first year Radiologic Technology Students has been eliminated with the current structure under the Texas Medical Board.

Please advise if there is a process in place that would allow us to continue with the practice that we have been following for many years.

Any help would be greatly appreciated as the technologist shortage continues to worsen over time.

Respectfully,

William "Bill" Tobin
Radiology Director
East Texas Medical Center
Tyler, TX 75701

When these students completed the 2 year program, they were strong in their roles and better technologists because their year of NCT work. It gave us a better level of competency in this facility and in the region. They were "trauma ready" and could readily work as a technologist. I ask that this "omission" be addressed and the change recognized as to it's impact to that skill set as well as the availability of technologists, a field in which we are experiencing a significant staffing shortage that is magnified further by this change.

Thank you-Bill Tobin

Any Alternative or New Recommendations on This Agency:

Reinstate the NCT enrolled in the 2 year radiologic technology program as was previously in place with the dept of health.

My Comment Will Be Made Public: I agree