

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: Wednesday, June 04, 2014 5:19:36 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 04, 2014 3:59 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 4, 2014 - 15:58

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Vicki

Last Name: Sanders

Title: Assistant Professor/ Radiologist Assistant Program Clinical Coordinator

Organization you are affiliated with:

City: Wichita Falls

State: Texas

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

I OPPOSE the plan for discontinuation of the Medical Radiologic Technologist Licensing Program stated in Issue 3 of the Sunset Advisory Commission's May 2014 report.

Anyone administering a dose of ionizing radiation to patients should be licensed in the state to ensure they have met minimum education and competency requirements, they have not have their national certification revoked or have been under ethical sanctions, and there are no acts of reported misconduct that might potentially harm the patient.

There are no federal standards on the education and regulation of radiologic technologists. Although The Joint Commission is starting to require radiologic technologists to have ARRT national certification for the use of ionizing radiation, many hospitals do not have to be accredited by The Joint Commission and may elect to be accredited by other organizations with lower standards, leaving patients exposed to untrained workers that prescribe a dose of radiation that has been documented to cause biological damage if used incorrectly.

Outpatient facilities, outpatient surgical centers, mobile radiography companies, etc. do not have to abide by any certification requirements for their radiologic technologists to ensure that they are competent and capable to perform examinations safely. The exposure of the patient to ionizing radiation is only one part of this professionals responsibility, radiologic technologists must also make sure that the procedure perform is technically adequate and positioned correct for the radiologist to give an accurate medical diagnosis. Radiologic technologists are responsible to ensure that other healthcare workers, family, visitors, etc. are protected from medical radiation. The only way that the patients of Texas are assured that the person performing their radiologic examination is safe, competent, and has met continuing education and certification standards, is that all personnel using ionizing radiologic equipment are licensed by the State.

Any Alternative or New Recommendations on This Agency: My first recommendation is not to discontinue to the Medical Radiologic Technology Program. If the program must be discontinued by the DSHS, my second suggestion would be to move the licensure of radiologic technologists to the Texas Department of Licensing and Regulation. My last suggestion is for the State of Texas to make a Board of Radiologic Technologist Examiners, like the Board of Nurse Examiners, to oversee the licensing of those individuals that use ionizing radiation.

My Comment Will Be Made Public: I agree