

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, November 18, 2016 8:05:08 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, November 17, 2016 3:45 PM  
To: Sunset Advisory Commission  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS MEDICAL BOARD

First Name: Greg

Last Name: Yardley

Title: Radiology Technologist

Organization you are affiliated with: College of Health Care Professions

Email:

City: Houston

State: Texas

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

As a radiology technologist it is my responsibility to make sure the patient I am imaging "receives the least amount of radiation, which means, making every reasonable effort to maintain exposures to ionizing radiation as far below the dose limits as practical, consistent with the purpose for which the LICENCED activity is undertaken, taking into account the state of technology, the economics of improvements in relation to state of technology, the economics of improvements in relation to benefits to the public health and safety, and other societal and socioeconomic considerations" (United States Nuclear Regulatory Commission).

Taking away the LMRT license will ensure that unregistered, untrained medical personal will be performing diagnostic medical x-rays who have no idea or understand the harm that x-rays can cause.

You must ask yourself: Who do you want performing an x-ray on your child, who is very vulnerable to x-ray exposure? Some one who is licensed and registered? Or some one who spent a few hours in a class?

Also as an experienced Radiology technologist you don't just push a button and get an image. Positioning the anatomy being imaged is an art form and takes much time and Practice. It is imperative that you are taught and practice and perform in a clinical setting to help you learn the proper positioning and radiation procedures proving you are qualified to use radiation equipment.

If the LMRT license is eliminated be reassured that healthcare personal who have not been trained in proper radiation protection will be exposing you and your children with unnecessary radiation. Elimination of LMRT will give the physician an out from needing to higher a proper trained radiology technologist and I will guarantee he will just have his medical assistant performing the x-rays who has know idea what they are doing.

**NOT HAVING LICENCED RADIOLOGY TECHNOLOGIST OR LIMITED RADIOLOGY TECHNOLOGIST IS CRIMINAL.** The wise thing to do is getting rid of the NCT certificate because the lack of classroom training and clinical competency assessment does not align with educational and clinical standards related to the field of radiography as does the LMRT.

It is all about RADIATION EXPOSURE, you must be trained and tested and licensed to use anything that produces radiation. The NCT program does not meet ALARA ( as low as (is) reasonably achievable) standards.

Therefore I am greatly opposed to eliminating the LMRT license.

Any Alternative or New Recommendations on This Agency:

Being licensed by the International Society of Clinical Densitometry (ISCD) to perform Dual-energy X-ray absorptiometry (Also called DXA, DEXA, Bone Density) needs to be seriously considered.

Osteoporosis, bone loss is a very well ignored disease however, people tend to not relate osteoporotic hip fractures to a 30% mortality rate within a year after fracture. Which cost the tax payers millions.

What does this have to do with being licensed to perform DXA's scans? 1) It uses x-ray that in it self should require you to be registered and licensed to use it. 2) It is documented at up to 30% of DXA scans are perform, analyzed, or interpreted incorrectly. That is not an acceptable percentage when you are dealing with human lives.

The same thing will happen to radiology technologist that has happened to DXA if you eliminate the LMRT license. None registered, trained and properly educated individuals will be performing you X-rays and who knows what you will get.

My Comment Will Be Made Public: I agree