

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, June 23, 2014 8:02:11 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 20, 2014 5:42 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 20, 2014 - 17:41

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Niki

Last Name: Allen

Title: medical radiology technologist

Organization you are affiliated with: Oklahoma Department of Veterans Affairs

City: Claremore

State: Oklahoma

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I oppose the Sunset Commission's recommendations to DSHS to eliminate its medical radiology technology program. Enforcing licensure requirements of radiology technologists ensures that patients are receiving the best care possible when they are having diagnostic exams performed. Licensed, certified radiology technologists are not only clinically trained, but they are also scholastically trained in radiation biology, physics, radiation protection and machine instrumentation. Currently, I work as a radiology technologist at a facility in Oklahoma. Our state doesn't require licensure with the health department nor do they require individuals to be educated and certified with the American Registry of Radiology Technologists. Therefore, a facility can choose and many of them do choose to cross train lab technicians and clinical secretaries to perform complex radiology exams with patients. Put yourself in a patient's position. Would you want a cross trained, non-certified, non-licensed lab technician or secretary to perform your CT scan? How about one of them performing a difficult X-ray exam of your spine after you've been in an accident? If DSHS is forced to eliminate its MRT program, patients could face these scenarios. By enforcing licensure, certification, and education requirements for radiology technologists, DSHS is ensuring that MRTs and facilities are being held responsible for their actions. By enforcing these requirements, DSHS also makes a clear distinction between the scopes of practice for NCT, LMRT, lab technician and MRT. The goal of MRT regulation is to promote patient safety. The reduction in cost that your agency (Sunset Commission) believes will occur is not worth a patient's safety or well-being.

Any Alternative or New Recommendations on This Agency: If Sunset Advisory Commission is looking for opportunities to cut costs, it would be more beneficial to review professions that require licensure but don't require one to administer or practice patient care.

My Comment Will Be Made Public: I agree