

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, June 19, 2014 1:42:41 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 19, 2014 10:01 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 19, 2014 - 10:01

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Linda

Last Name: Boatner

Title: Senior Director, Radiology Imaging

Organization you are affiliated with: Children's Medical Center of Dallas

Email: Linda.Boatner@childrens.com

City: Dallas

State: Texas

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

I do not support the deregulation of licensure for medical radiologic technologists. I have been a radiologic technologist for the last forty-four years. I am currently a licensed Medical Radiologic Technologist. I worked in my profession prior to the time of required licensure for medical radiologic technologists and have seen the level of patient care excellence and safety increase for patients after licensure was put in place. Do not remove this needed control of radiation practices for our patients. Without this licensure in place, anyone can administer radiation with little or no training. Deregulation places the public at a potential, significant risk of harm.

-Licensure for radiologic technologists ensures that patients are being treated by individuals who have met education and certification standards.

-Licensed radiologic technologists lower patient exposure to ionizing radiation, a known carcinogen, by optimizing technique for medical imaging and treating cancers and other illnesses. Unlicensed personnel do not understand how to minimize exposure while achieving quality images or effective treatments.

-Licensure for radiologic technologists preserves the state's right to penalize individuals who may not treat patients according to professional standards or administer radiation correctly. Without licensure, the state cannot protect its citizens from untrained individuals.

There are numerous reasons to not deregulate Medical Radiologic Technologists. Public health and safety is my greatest concern. Licensed MRT's are direct patient care providers in a profession where extensive specialized skills and training are required and a significant potential risk of harm to the public exists from lack of training, education, unprofessional behaviors and incompetence. The lack of a formal state licensure process in Texas would

mean that MRT's unable to secure a license in another state or have those who have lost their license due to incompetence, unprofessional behaviors or criminal activity, will be eligible to work in Texas, without the current review and screening that protects the citizens of Texas, regardless of which healthcare facility the MRT is seeking to join.

I respectfully and strongly request your attention and intervention to prevent deregulation of MRT's in our great state of Texas and for the Medical Radiologic Technologists program to either remain with the DSHS or to be transferred to the Texas Department of Licensing and Regulation.

Respectfully submitted,

Linda Boatner, RT (R)

Any Alternative or New Recommendations on This Agency: I respectfully and strongly request your attention and intervention to prevent deregulation of MRT's in our great state of Texas and for the Medical Radiologic Technologists program to either remain with the DSHS or to be transferred to the Texas Department of Licensing and Regulation.

My Comment Will Be Made Public: I agree