

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 25, 2014 4:12 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 25, 2014 - 16:12

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Melitta

Last Name: Brown

Title: Radiology Tech

Organization you are affiliated with: DOD

City: Killeen

State: Texas

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

To lose a license professionally is degrading, regardless how. A tech could lose a license by thyself or because of reasons out of the norm. The Texas Sunset Advisory Commission will hold a town hall meeting in six days. Topic of discussion, will the field of Radiology no longer need a license to practice?

Really, why the big fuss over a state license? It's not a necessity for any state to uphold. Thirteen states don't require the field if radiology to hold a license to practice. This includes my home state Nevada.

How will a state license really affect my pay? Looking on the bright side no more ceu's, right? Plus no more state fee... kind of sounds like a win-win.

Not exactly, let's face it, to have a state license means to be accredited.

The Texas Sunset Commission wants the field of radiology to not be accredited? To not be accredited means "not necessarily perform poorly", according to naspaa.org. That's acceptable, to not necessarily perform poorly?

The field of radiology is relatively small, but has a lot of different divisions. There's X-ray, CT, MRI, Nuclear Medicine, Radiation Therapy, Angio, Mammo, PET, and ultrasound. The field of radiology is the use of energy to obtain a pic of the human body. The main energy that is used is radiation. If radiation is used without caution it can and will cause damage to the patient. Damage caused by radiation usually isn't seen immediately.

It can take years for the damaging effects of radiation to cause significant defects to the body. The effects can be, but not limited to birth defects to an unborn child, radiation induced cancer, and worst case scenario death.

After numerous hours on the web researching states who uphold a state license vs ones who don't. On the topic of pay, training, last why would a state want an unlicensed radiology tech? According to Salary.com all of the unlicensed states have reality comparable salaries. For an X-ray tech in Nevada the pay is 26 per hr. The training is varied. Most hospital train new radiology from 3 months up to 2 years. There are techs which receive zero training. According to Eric from Government Affairs at ARRT it's not unforeseeable

for a hospital to hire a high school grad allow them the shoot X-rays on live patients for minimum wage. Why would any state want to have unlicensed Radiology Technologist? It has to do with money. It is cheaper to hire an unlicensed technologist verse a licensed one.

What does all this information really mean? To have an unlicensed technologist means any person off the street can legally give patients radiation. That has to be stopped. We have to continue to educate the field, which means schooling. Going to college and become someone is the American Dream. To learn the science behind radiation is the best way to ensure all of our patients are getting the best possible treatment and care available.

Lastly, on the Nevada ARRT Facebook page has a link from The Joint Commission.

“THE JOINT COMMISSION’S NEW IMAGING STANDARDS “The race to implement reform and effective solutions around radiation dose safety was brought to the forefront when some states took a very progressive initial stance regarding patient safety and quality by creating control measures to govern certain radiology procedures that utilize radiation dose as part of an exam. By creating legislation that mandated the monitoring of radiation dose and reporting of any radiation dose incidents, states such as California and Texas left healthcare providers with no option but to comply with new laws and enhance their radiation safety initiatives. But being compliant doesn’t always equate to a clinically proficient, ”patient first” radiation safety program.

Following the legal reforms, numerous hospitals and healthcare organizations outside of these states quickly embraced the call for radiation dose safety changes by beginning to build more robust radiation safety programs and re-evaluating internal radiation safety practices.”

Texas and California is the standard in Radiation Safety. Both States also have registered Technologist. We owe it to our patients to keep it that way.

To be able to safely give radiation takes background knowledge on how to effectively use radiation without causing harm.

Any Alternative or New Recommendations on This Agency: No

My Comment Will Be Made Public: I agree