

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: Monday, June 09, 2014 12:39:02 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 09, 2014 10:03 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 9, 2014 - 10:02

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Carlton

Last Name: Bruce

Title: MSA, RT(R)(CT)

Organization you are affiliated with: Electra Memorial Hospital

City: Electra

State: Texas

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

I FIRMLY OPPOSE any deregulation of the medical radiologic technologist program for cost saving measures related to state budgets for the following reasons.

- 1) Licensure standards for radiologic technologists ensures that the public is being treated by individuals that have met the highest educational and certification standards available.
- 2) Licensed radiologic technologists administer ionizing radiation, a known carcinogen, in the lowest possible dose in order to create diagnostic medical images. It is a commonly known fact that unlicensed personnel do not have the requisite education or ability to function in this manner.
- 3) Licensure preserves that state's right to penalize individuals who may not treat patients according to professionals standards or administer radiation in incorrectly. Without licensure, the state cannot protect the public-at-large from totally incompetent, untrained individuals.

It is amazing to me that the State of Texas is even approaching a subject such as this during a time that other organizations are creating more stringent standards in the area of medical radiology. I find it quite dichotomous that the Texas State Department of Health Services would even consider such deregulation while at the same time introducing stricter standards in the areas of computed tomography and fluoroscopy. Do you have any idea who performs these exams? If you deregulate the licensure requirement, the state of Texas will have incompetent people performing these exact same exams that you demand tighter regulatory control over. This make very little sense to me. It should be an all-or-nothing approach.

Any Alternative or New Recommendations on This Agency: If the State of Texas wants to ensure the public's protection from medical radiation overexposure, they must maintain some form of licensure requirement over the people performing these exams. If the state wants to step away from the state licensure requirement, they must demand these people maintain a national certification with the national accrediting body, The American Registry of Radiologic Technologists. This is the only cost-saving measure that I see available to the Texas DSHS. You must demand that ALL medical radiologic technologists in the State of Texas maintain certification in good standing with our national accrediting body.

My Comment Will Be Made Public: I agree