

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, June 20, 2014 9:14:57 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Friday, June 20, 2014 8:41 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 20, 2014 - 08:41

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Tim

Last Name: Burns

Title: Radiology Manager

Organization you are affiliated with:

City: Dallas

State: Texas

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

I strongly oppose the recommendation to eliminate licensing requirements for Radiology Technologists. Reasons I oppose this are: #1 Licensure for radiologic technologists ensures that patients are being treated by individuals who have met education and certification standards. #2 Licensed radiologic technologists administer ionizing radiation, a known carcinogen, in the lowest dose possible to patients in order to create medical images and to treat cancers and other illnesses. Unlicensed personnel do not know how to administer low doses of radiation and still achieve quality images or effective treatments. #3 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.

The State of Texas has done what is right for the public by mandating that Radiologic Technologists be licensed, ensuring the technologists are held to specific standards of radiation specific training and continuing education and that only qualified technologists are administering radiation. The comment that we have federal oversight is not entirely accurate, as it relates to the technologists credentials. By removing the licensing requirement for Radiologic Technologists you minimize the value of our profession to the public and recognition as healthcare professionals who provide high quality diagnostic and therapeutic exams. This will create a loophole for unqualified people to work in an environment that will be potentially hazardous to the patients and public we serve.

Any Alternative or New Recommendations on This Agency: Continue the requirement for licensed Radiology Technologists. The public would want the reassurance that only qualified, credentialed, and properly licensed technologists are performing their exams that require radiation. This can only be achieved through proper licensing.

My Comment Will Be Made Public: I agree