

From: [Sunset Advisory Commission](#)
To: [Brittany Roberson](#); [Janet Wood](#)
Subject: FW: Sunset Advisory Commission Staff Report - DSHS
Date: Friday, June 06, 2014 4:00:51 PM

From: Christi Carter
Sent: Friday, June 06, 2014 3:45 PM
To: Sunset Advisory Commission
Subject: Sunset Advisory Commission Staff Report - DSHS

Ms. Teleki,

My name is Christi Carter and I am an educator in a Radiologic Science Program and also an MRT. I am also one of the 400 surveys that you received regarding the DSHS in November and I have many questions regarding the State's plan on regulating the personnel that will be operating radiation producing equipment.

The Texas Administrative Code Title 25 Part 1 Chapter 289 Subchapter E paragraph 5 states that "Individuals who operate radiation machines for human use shall meet the appropriate credentialing requirements of rules issued in accordance with the Medical Radiologic Technologist Certification Act, Texas Occupations Code, Chapter 601." But since you have proposed the Discontinuation of this Program, how will the State regulate who will operate these machines? There will be no need to worry about our hospitals or imaging centers as they are also under The Joint Commission rules. But there will be nothing that will regulate some of the emergency clinics and the thousands of doctor's offices across the state. These offices will be able to allow anyone from the receptionist to the lab tech to the medical assistant to take an x-ray. Without proper education, the public will be put at risk by those individuals not trained in radiation physics, radiographic positioning techniques, radiation safety, etc.

If the Commission follows through with this discontinuation, there will be no governance of individuals operating radiographic equipment. To prevent potential harm to citizens of the State of Texas, I believe the legislators must amend the above sentence from the TAC 25 to read "Individuals who operate radiation machines for human use shall be registered by the American Registry of Radiologic Technologists, students of an accredited radiography program leading to an ARRT certification or be licensed by the State of Texas as a doctor of medicine, osteopathy, podiatry, dentistry or chiropractic".

Has the Commission considered those that are currently taking x-rays on members of the community that are not regulated by a national body? Have you reviewed the Non-Certified Technician licensure? or the Limited-Medical Radiologic Technologist? The LMRT and the NCT have no national governing body to license.

Please consider my concerns and feel free to contact me if you would like to discuss this further.

Christi Carter

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, June 18, 2014 1:16:53 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Wednesday, June 18, 2014 11:57 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 18, 2014 - 11:56

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Christi

Last Name: Carter

Title: Program Director

Organization you are affiliated with:

City: Carrollton

State: Texas

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

I oppose the discontinuation of the Medical Radiologic Technologist Licensing Program as written in the Sunset Advisory Commission's Staff Report- Issue 3. The following bullet points outline my concern:

- Currently the State of Texas has 3 levels of individuals that are allowed through the MRT Program to use radiation in the healing arts. They are: Medical Radiologic Technologist (MRT), Limited Medical Radiologic Technologist (LMRT) and the Non-certified Technician (NCT). The only designation above that is certified by a national agency is the MRT. The LMRT and NCT are only licensed by the state and held to the state licensure laws. Without the MRT Program to govern and license these individuals, there will be no oversight on their training, limitations, and continued education.
In essence, by eliminating the MRT program, you will be allowing anyone, with any skill level, to take an x-ray.
- Patients trust their healthcare provider to ensure that the care that they are receiving is appropriate and delivered with the utmost attention and safety. I teach in a nationally accredited program that is held to a high standard of instruction and operation. Students like mine spend anywhere from 18-24 months to complete a Radiology program. The completion of this program awards the student the ability to take the American Registry of Radiologic Technologists Radiography exam. If we as a profession felt that we could produce a Radiologic healthcare professional in less time, with less required content, we would change the certification standards of our profession. By eliminating the MRT program, you will be removing the standard level of education and skill in the State of Texas required of those using radiation in the healing arts.
- As a profession we have been fighting for federal legislation for minimum education standards and greater

regulation of tracking the radiation dose that each patient receives throughout their lifetime. Currently there are two national campaigns seeking greater regulation of radiation dose:

Image Gently and Image Wisely. Both of these campaigns seek to protect the public from unnecessary radiation exposure and to ensure that each person administering radiation has the appropriate education and knowledge to do so.

Again, by eliminating the MRT Program, the state will not be able to protect its citizens from unnecessary radiation exposure by untrained individuals.

I ask not only as a radiologic technologist and educator but as a daughter, granddaughter, niece, cousin and friend to reconsider the discontinuation of the Medical Radiologic Technologist Licensing Program. I fear that economics will outweigh safety in many doctor's offices and medical clinics and they will hire untrained or under-trained individuals to take the x-rays in their practices.

Thank you for allowing me to comment and I hope that you will consider my comments when making your final decision.

Christi Carter, MSRS, RT(R), CIIP

Any Alternative or New Recommendations on This Agency: None

My Comment Will Be Made Public: I agree