

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Monday, June 23, 2014 8:08:00 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Saturday, June 21, 2014 12:03 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Saturday, June 21, 2014 - 12:02

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Bonnie

Last Name: Clinebell

Title: Radiologic Technology Program Coordinator/Instructor

Organization you are affiliated with: Southwest Texas Junior College

City: Uvalde

State: Texas

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

I am writing to strongly and vehemently oppose the discontinuance of the Medical Radiologic Technologist Licensure Program and the repeal of licensure standards in the state of Texas.

I am an educator and a Registered Technologist in Radiography and Mammography (RT(R)(M)(ARRT)) with almost 21 years of experience and am licensed in two states (Texas and New York). I have been awarded a Master of Science degree in Radiologic and Imaging Science from Thomas Jefferson University, Philadelphia, PA. I am also a concerned citizen of the state of Texas.

My understanding of the proposal to discontinue licensure and repeal licensure standards is based on the fact that Radiologic Technology is a highly regulated environment, there is a private accreditation process (ARRT) and there is little regulatory activity.

Yes, the administration of radiation for medical imaging purposes and equipment utilized is regulated through numerous federal and state agencies however; the ARRT is not an "accreditation process". If you refer to the ARRT website (www.rrt.org), you will see that the ARRT tests, certifies and annually registers Radiologic Technologists. There is currently no federal oversight for Radiologic Technologists. Licensure provides the regulatory environment needed for Radiologic Technologists at the state level and helps to ensure that patients are receiving quality medical imaging services by technologists that have met rigorous educational, clinical and ethical standards.

Please note that individual certification by the ARRT is VOLUNTARY, it is NOT MANDATORY. Technologists may initially be certified by the ARRT to gain state licensure but then have the option to not renew annual registration of that initial certificate. Although many employers require ARRT certification and continued

registration of that certificate as a requisite of employment, not all do. The ARRT does require continuing education and compliance with their standards for annual registration of a certificate.

Ionizing radiation is a KNOWN CARCINOGEN. Licensure standards of technologists assists in keeping patient exposure to ionizing radiation “as low as reasonably achievable (ALARA)”, a concept that is ingrained in first semester Radiologic Technology student’s minds that is carried with them throughout their career. As students, technologists are taught how to optimize technical factors to minimize radiation exposure to the patient while achieving quality images for proper diagnosis. Uneducated and unlicensed personnel do NOT understand the intricacies behind achieving the goal of ALARA while still producing optimal images.

State licensure of Radiologic Technologists provides a means for the state to penalize individuals that do not treat patients according to professional standards, that do not administer ionizing radiation appropriately and for those who choose to practice outside the scope of practice of a technologist.

State licensure is the first line of defense in the protection of Texas citizens, which includes YOU and your family, from individuals that are untrained and uneducated in performing medical imaging procedures.

Radiologic Technologists are the third largest category of healthcare professionals only surpassed in number by physicians and nurses (www.arrt.org). State licensure and continued licensure standards are vital in ensuring quality patient care. Medical imaging procedures can be lifesaving. Contrarily, medical imaging procedures can cause considerable harm and even death if not performed properly by qualified, licensed individuals. Discontinuation of licensure and repealing licensure standards would increase medical errors, the misadministration of radiation and radiation dose to patients. The safety of Texas residents seeking medical imaging procedures will be compromised. There is no way to completely eliminate the risk of radiation exposure to individuals or harm to a patient caused by medical errors. But, we can reduce these risks by maintaining licensure and licensure standards for medical imaging professionals in the state of Texas.

Respectfully submitted,

Bonnie S. Clinebell, MS, RT(R)(M)(ARRT)

Medical Imaging professional and concerned resident of the state of Texas

Any Alternative or New Recommendations on This Agency: Continue with current state licensure and licensure standards.

My Comment Will Be Made Public: I agree