

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 12:36:55 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Monday, June 09, 2014 11:20 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 - 11:20

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Alison

Last Name: Creed

Title: Radiographer

Organization you are affiliated with: TSRT

City: Krum

State: Texas

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

I am completely outraged that you would even consider to discontinue the Medical Radiologic Technologist Licensure Program. You suggest in your proposal that ionizing radiation is not a public health concern and recommend that there should be NO regulation from either DSHS or the TDLR! Even the FDA puts forth great effort to minimize radiation dose in the Health care industry by recommending proper training and education as oppose to relying on "x-ray technicians" to be working "in conjunction with several other highly trained healthcare professionals". What if there are no other employees in that facility trained in Radiologic Technology? Places such as urgent care centers or individual clinics may only have one person performing x-rays and the supervisors, while highly trained in the medical field, may have not a clue about radiation safety. Radiation control in the Healthcare environment is, as you deny, a critical public health function. I am currently licensed with ARRT and the State of Texas and work with pediatric orthopedics. I consistently have to repeat radiographs that patients bring because they are not diagnostic. Those are usually done at urgent care or primary care facilities and it is usually by an NCT or LMRT whose education is next to nothing.

Have you research the effects of ionizing radiation? Is your purpose population control? If so not regulating radiation would be completely effective. Did you know that exposure to ionizing radiation can result in radiation induced genetic or somatic effects?

Instead of deregulating Medical Radiologic Technologist maybe you should minimize the licenses in the field of radiology be getting rid of NCTs and LMRTs. This would reduce cost as well as provide a safer environment for the public in general.

Any Alternative or New Recommendations on This Agency:

Do away with licenses such as Non-Certified Technician (NCT) and Limited Radiologic Technologist (LMRT) and strictly regulate Medical Radiologic Technologist Licensure making sure that facilities providing x-ray services are

employing only Medical Radiologic Technologist.

My Comment Will Be Made Public: I agree