

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, June 19, 2014 1:39:54 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 19, 2014 9:28 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 19, 2014 - 09:27

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Miguel

Last Name: de la Guardia

Title: Radiation Safety Officer

Organization you are affiliated with: Cook Children's Medical Center

Email: Miguel.delaguardia@cookchildrens.org

City: Fort Worth

State: Texas

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

It is my understanding that the Texas Sunset Advisory Commission has developed a report recommending the discontinuance of the Medical Radiologic Technologist Licensure Program. Eliminating licensure requirements for radiologic technologists is not in the best interest of the State or patients who are administered radiation for diagnostic or therapeutic purposes for the following reasons:

- 1) Licensure for radiologic technologists ensures that patients are being treated by individuals who have met education and certification standards.
- 2) Licensed radiologic technologists are better trained to keep patient exposure to ionizing radiation (a known carcinogen) as low as possible by optimizing techniques for medical imaging, treatments for cancers and other illnesses.
- 3) Unlicensed personnel are under no requirement to stay current in their field in order to know the latest techniques on minimizing radiation exposure while achieving quality images or effective treatments.
- 4) 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.

I hope for the sake of patients that the State keeps the Medical Radiologic Technologist Licensure Program.

Sincerely - Miguel de la Guardia

Any Alternative or New Recommendations on This Agency: Keep the licensure program, as the alternative is a

danger to public health.

My Comment Will Be Made Public: I agree

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Opposition to the discontinue medical radiologic technologist licensing
Date: Monday, June 23, 2014 3:27:41 PM

From: Miguel de la Guardia
Sent: Monday, June 23, 2014 3:26 PM
To: Sunset Advisory Commission
Subject: Opposition to the discontinue medical radiologic technologist licensing

I am a nuclear medicine technologist and the Radiation Safety Officer at Cook Children's Medical Center in Fort Worth. Let me take this opportunity to state my OPPOSITION to the Sunset Advisory Commission's Staff Report - Issue 3 - recommendation to discontinue medical radiologic technologist licensing.

Licensing of Radiologic Technologists (RT) ensures that all patients are receiving radiological examinations and treatments from highly-trained individuals.

- 1) Licensed RTs lower patient exposure to ionizing radiation, a known carcinogen, by optimizing technique for medical imaging and treating cancers and other illnesses.
- 2) Unlicensed personnel do not have the training or understanding needed to minimize radiation exposure while achieving quality images or effective treatments.
- 3) Licensure for RTs 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.
- 4) Licensure ensures that patients are being treated by individuals who have met educational and certification standards.
- 5) Licensed RTs provide technically consistent and correctly positioned images, which improve the accuracy of the radiologist's diagnosis and minimizing the need to repeat images which increases radiation exposure to patients and medical costs.
- 6) Licensed radiologic technologists adapt procedures and technical factors to each individual patient's needs. The radiologic technologist's training allows for technologists to evaluate the patients' medical status, history, underlying pathologic processes, and physical factors to create a quality diagnostic image or therapy that is truly individualized for each patient. Unlicensed personnel do not have the educational background to critically appraise the individual patient's situation and adapt to the needs of the patient.

I strongly urge the Sunset Advisory Commission's to reconsider its recommendation to discontinue medical radiologic technologist licensing.

Sincerely – Miguel de la Guardia

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[I-131 mIBG Therapy Program](#)

