

**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 5:13:41 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 19, 2014 2:36 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 19, 2014 - 14:36

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Steven

Last Name: Donahoe

Title: Radiologic Technology Educator

Organization you are affiliated with: Angelina College

Email: sdonahoe@angelina.edu

City: Lufkin

State: Texas

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

Dear Texas Sunset Commission,

I am a radiologic technologist, radiography program instructor, and radiography program clinical coordinator. I am writing in OPPOSITION of the Sunset Advisory Commission's Staff Report – Issue – 3 concerning the recommendation to discontinue medical radiologic technologist licensing. I have been in the profession for 18 years. I have been a radiography educator for the last 10 years. One of the courses I teach is radiobiology and radiation protection.

The definition of radiation protection is extremely specific. Radiation protection is universally defined as effective measures employed by radiation workers to safeguard Patients, Personnel, and the General Public from unnecessary exposure to ionizing radiation. This would include any radiation exposure that does not benefit a person regarding diagnostic information for medical needs or any radiation exposure that does not enhance the quality of the study for the purposes of diagnosis.

Exposure to ionizing radiation is cumulative over an individuals' lifetime.

Any exposure, regardless of the dose amount, has the potential to cause somatic damage, genetic damage, and malignancy. It is the job of the radiographer to use optimal technical exposure factors in order to limit exposure as much as possible.

Licensure for radiologic technologists helps to ensure that patients are being treated by individuals that have met educational and certification requirements. Licensure also helps to ensure that radiographers are properly trained in proper anatomical positioning, general patient care, and radiation protection. Licensed radiologic technologists adapt procedures and technical exposure factors to each individual patient's needs. Unlicensed personnel increase the potential for improperly positioned images, compromising the diagnostic effectiveness of the exam and

increasing the need for repeat images. This results in an increase in unnecessary radiation exposure and increased medical costs. Without licensure, the state would lose the right to penalize individuals who do not perform according to professional standards or administer radiation correctly. Texas would be unable to protect its citizens from untrained individuals.

Discontinuing medical radiologic technologist licensing would be detrimental to the patients, personnel, and the general public of Texas.

Thank you for your time and consideration of my concerns.

Sincerely,

Steven Donahoe

Any Alternative or New Recommendations on This Agency: Keep licensure

My Comment Will Be Made Public: I agree