

June 20, 2014

Madam Chair and members of the Sunset Advisory Commission,

Thank you for the opportunity to speak to the commission today on behalf of the Joint Review Committee on Education in Radiologic Technology, located in Chicago. My name is Kelly Ebert and I am the Assistant Director, and a radiation therapist. The JRCERT is the only agency recognized by the United States Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA), that programmatically accredits traditional and distance delivery educational programs in radiography, radiation therapy, magnetic resonance, and medical dosimetry. My comments are specifically directed toward the Sunset Advisory Commission Staff Report of May 2014, issue number 3, titled "The Unmanageable Scope of the Department of State Health Services Regulatory Functions Reduces the Needed Focus on Protecting Public Health."

The JRCERT has grave concerns regarding the elimination of licensure in Texas. We stand in opposition to the deregulation of radiography and radiation therapy licensure in Texas. My colleagues representing other organizations testifying today will address the risk associated with exposure to ionizing radiation. I would like to focus my comments on the need for well-monitored educational programs.

The Texas Medical Radiologic Technologist Certification Program, established in 1988, has served the residents of Texas well. Educational requirements originally established in this program ensure the quality of the imaging and therapeutic specialists who will function in the professions. Without well educated practitioners, residents of Texas will be subjected to suboptimal radiologic procedures and therapeutic treatments, all leading to potentially negative effects from radiation exposure.

It is programmatic accreditation of educational programs that ensures that future radiographers and radiation therapists obtain the knowledge, skills, and integrity needed to make critical decisions when performing diagnostic and therapeutic procedures. It is credentialing and licensing that assures that radiographers and radiation therapists possess the educational foundation necessary to practice in the field. Without licensing, individuals who have not received the appropriate education can be employed to perform all types of radiologic and therapeutic procedures. Deregulation and reduction of monitoring and oversight of the profession threatens the public safety of the people of Texas. JRCERT programmatic accreditation, hand-in hand with Texas state licensure, assures quality education that ultimately protects patients and students.

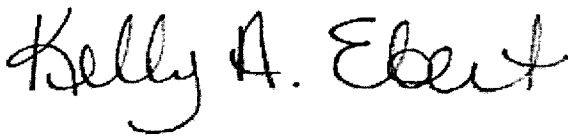
Current Texas licensing law requires programs in medical radiologic technology to be accredited. Programmatic accreditation assures that programs meet acceptable levels of quality based on standards developed by the profession. JRCERT Standards were developed by a

national consensus of professionals in the field. We develop evaluation criteria and conduct peer evaluations to assess whether our standards have been met. Programmatic accreditation requires that students be taught radiation protection, for themselves and for their patients, prior to exposing any patient to ionizing radiation. Programmatic accreditation also requires that students be continually supervised by a qualified practitioner who has been educated in the intricacies of practicing in this technologically advanced profession.

In the past, nearly all imaging and therapeutic procedures were performed in highly regulated environments such as hospitals or medical centers. Healthcare delivery has changed dramatically in the past few years. Patients are no longer routinely admitted to a hospital for diagnoses, imaging procedures or therapeutic radiation. In today's health care world, the shift is to move patients from the regulated inpatient environment to a less expensive, less regulated outpatient environment. The JRCERT accredits 80% of all radiography and 83% of all radiation therapy programs in the state of Texas. These programs utilize clinical settings for student experiential education. Over half of the clinical education facilities in Texas are non-hospital, less regulated facilities. As healthcare delivery continues to evolve, the result will be future practitioners receiving clinical education in facilities where they may not learn the minimum standard of care.

The JRCERT acknowledges the process and criteria involved in evaluating the exclusion of Medical Radiologic Technologists from the licensing process in Texas. We do not agree that regulation of this type of educational environment will be adequately subsumed by another regulatory agency to assure that the people of Texas will continue to be protected from the dangers of ionizing radiation. We go on record voicing our opposition to this move and feel that the elimination of the state licensure requirement will cause a clear threat to the health, safety and welfare of the residents of Texas. The continued inclusion of medical radiologic technologists in the licensure process in Texas, along with programmatic accreditation, will ensure highly trained and qualified practitioners who service the citizenry of Texas for the years to come.

Respectfully,

A handwritten signature in black ink that reads "Kelly A. Ebert". The signature is written in a cursive, flowing style.

Kelly A. Ebert, MPA, RT(T)
JRCERT
Assistant Director

The JRCERT promotes excellence in education and elevates quality and safety of patient care through the accreditation of educational programs in radiography, radiation therapy, magnetic resonance, and medical dosimetry.