

Written Testimony before the Texas Sunset Commission Public Hearing

June 25, 2014

Room E1.036, Texas Capitol Extension

TO: Sen. Nelson, Rep. Price, Sen. Birdwell, Rep. Burkett, Sen. Hinojosa, Rep. Dutton, Sen. Patrick, Rep. Gonzales, Sen. Schwertner, Rep. Raymond, Dr. Buckingham, Mr. Luce

FROM: Ernest Franklin, Baylor Scott & White Health

RE: **Sunset Advisory Commission's staff report, Issue 3- Recommendation to discontinue medical radiological technologist licensing.**

I am writing today on behalf of Baylor Scott & White Health to express my concerns regarding the recommendation proposed in the Sunset Advisory Commission's staff report to deregulate medical radiological technologists, or x-ray techs.

Baylor Scott & White Health was created Oct 1, 2013 with the merger of Baylor Health Care System and Scott & White Healthcare, each with over 100 years of Texas experience in healthcare delivery. Baylor Scott & White Health is the largest not-for-profit health care system in Texas with 34,000 employees, 2500 employed physicians and scientists, 6000 affiliated physicians, 43 hospitals, 500 patient care sites, a regional non-profit Health Plan offering all insurance products and two academic health centers teaching medical students, residents/fellows, nursing and allied health practitioners. The system has 5.3 million patient encounters annually.

The proposal by the Commission is problematic for the following reasons:

1. There is no other local, state, or federal regulation or license for medical radiology technologists. Other than the federal guidelines for being able to assess radiation dose, CMS and the Joint Commission defer to state regulatory bodies and only inspect for content of job descriptions. Removal of the state license would create a clinical quality hazard with untrained staff irradiating patients.
2. Equipment would still be inspected by the state, but the equipment is not error proofed enough allow untrained staff to irradiate patients.

3. Enactment of this proposal would also remove the safety mechanism of diagnostic physicists overseeing radiation administration, leading to increased preventable risk to patients.

Licensure of medical radiological technologists in Texas ensures that all patients are receiving care in radiology from highly trained individuals that have passed national certifications, met ethical requirements, and have had the necessary training required to deliver a proper dose of radiation, a known carcinogen. State licensure of radiologic technologists should remain in place to protect the health and safety of Texas citizens.

Sincerely,

A handwritten signature in black ink, appearing to read "Ernest Franklin, IV, MD, MBA". The signature is fluid and cursive, with a large initial "E" and "F".

Ernest Franklin, IV, MD, MBA

VP, Surgical and Ancillary Services

Baylor Scott & White Health