

**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:** Wednesday, June 11, 2014 10:49:55 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, June 11, 2014 10:49 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 11, 2014 - 10:48

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Susan Jameson

Last Name: Jameson

Title:

Organization you are affiliated with: general public

City: Dallas

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: In your staff report you barely even mention Medical Radiologic Technologists, yet you have decided to discontinue licensing. You touch on radiation safety and inspection of equipment. What you have failed to realize is that even though a machine meets requirements, it is still possible to use extreme amounts of radiation to perform the radiology exam.

Digital equipment makes an image that would have been unacceptable on film an adequate image to the eye. In your recommendation report you say that Radiologic Technologists are supervised to the same level as a person operating a perfusion machine in the operating room and directly supervised by a cardiothoracic surgeon. When a Radiologic Technologist performs an imaging exam, there is not a doctor or radiologist of any kind directly supervising them. Even if a physician was directly supervising the exam, they are not trained to know what amount of radiation is the lowest possible to still obtain a diagnostic exam. Technologists perform the exam completely independantly. The image is sent across a computer network and viewed by a radiologist. On many of the new digital machines, there is no way for the radiologist to verify that the image was obtained using the lowest amount of radiation possible. Education of anyone performing radiology exams is vital.

The only way to ensure education is to require it for licensure. If you remove licensure, you are also removing the requirement that a person much attend an accredited program to receive that education. In your recommendation you also mention that we have a national organization that provides us with credentials. We do have such an organization. The American Registry of Radiologic Technologists (ARRT). There is not a law in the state of Texas that requires people to be credentialed by the ARRT to perform radiology exams. If there were a law that required this credentialing, it would eliminate the need for state licensure. There is a federal law stating that radiologic technologists must meet certain requirements and be credentialed. This same law also has a clause that states that any state does not have to follow the law and can make their own law concerning persons performing radiation exams. By discontinuing licensure of radiologic technologists you are in fact putting the general public at risk. Education and credentialing and licensure are the only way to reduce the risk to public health. Radiation burn and

radiation induced carcinoma is a very real possibility if you have unlicensed, unqualified, and uneducated people allowed to perform xrays, CTs, etc. It would simply be a disservice to our public/patients to not require a person to be qualified and educated. I know you think that other regulations take care of these problems. I guarantee you they do not. Removing licensure gives enough slack in the law that will allow facilities to employ uneducated people to "train" to take xray exams.

Training does not equal education through an accredited program.

Any Alternative or New Recommendations on This Agency:

Oppose issue 3

Do not remove licensure from Medical Radiologic Technologists.

My Comment Will Be Made Public: I agree