

**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:** Thursday, June 12, 2014 1:03:42 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 12, 2014 9:38 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 12, 2014 - 09:37

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Cedric

Last Name: Jolivet

Title: TSRT Past President and Board Chair

Organization you are affiliated with: TSRT

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I strongly oppose any efforts to deregulate radiologic technologists in the state of Texas. Medical imaging procedures can be lifesaving, but conversely cause considerable harm to patients. The Sunset Advisory Report asserts that deregulation of Medical Radiologic Technologists would have little impact on public health and safety. Radiologic technologists are at the forefront of patient safety and quality. It is my view that deregulation of radiologic technologist licensure recommended by the Sunset Advisory Committee would increase the risk of medical errors and misadministration of radiation.

Any Alternative or New Recommendations on This Agency: Maintain the licensure. While there is no way to totally eliminate risk, we can reduce the risk for patients receiving medical imaging procedures or radiation treatments in the state of Texas through the licensure of professionals.

My Comment Will Be Made Public: I agree

**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:** Thursday, June 12, 2014 5:14:24 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 12, 2014 4:35 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 12, 2014 - 16:35

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Cedric

Last Name: Jolivet

Title: Medical Radiographer

Organization you are affiliated with:

City: Houston

State: Texas

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

I am writing in OPPOSITION of the Sunset Advisory Commission's Staff Report- Issue 3- recommendation to discontinue medical radiologic technologist licensing.

It is imperative that the State of Texas continue the licensing and regulation of radiologic technologist.

- Licensure for radiologic technologists ensures that patients are being treated by individuals who have met education and certification standards.
- Licensed radiologic technologists administer ionizing radiation, a known carcinogen, in the lowest dose possible to patients to create medical images and to treat cancers and other illnesses. Unlicensed personnel do not have formalized education to administer low doses of radiation and still achieve quality images or effective treatments.
- Licensure for radiologic technologists preserves the state's right to provide disciplinary action for 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.
- Licensed radiologic technologists provide radiologists and other healthcare providers with technically consistent, correctly positioned images, which improve the consistency and accuracy of the providers' diagnosis. Unlicensed personnel increase the potential for inconsistent or improperly positioned images, reducing the diagnostic effectiveness of exams and increasing the need for repeat imaging procedures. Repeat imaging

increases radiation exposure and medical costs.

- Licensed radiologic technologists adapt procedures and technical factors to each individual patient's needs. The radiologic technologists' training allows for technologists to evaluate the patient's medical status, patient's history, underlying pathologic processes, and physical factors to create a quality diagnostic image or therapy that is truly individualized for that patient.

Any Alternative or New Recommendations on This Agency: Maintain Texas Medical Licensure Program

My Comment Will Be Made Public: I agree