

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, June 23, 2014 3:24:17 PM

---

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, June 23, 2014 8:47 AM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 23, 2014 - 08:46

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: kara

Last Name: kline

Title: diagnostic technologist II

Organization you are affiliated with: UT Southwestern

City: richardson

State: Texas

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

I am a radiologic technologist writing in OPPOSITION of the Sunset Advisory Commission's Staff Report- Issue 3- recommendation to discontinue medical radiologic technologist licensing. First and foremost, the fact that this is even a proposed idea is not only insulting to my profession, but also to the patients. I take my job seriously, and I work hard to stay educated and knowledgeable in my profession. Secondly, shouldn't Texas be setting the "gold" standard for the rest of the nation rather than doing the bare minimum, especially in regards to public health and safety? Patients are always asking us about our education and background. From my experience, the majority of the general public are actually highly concerned with radiation exposure, and many of them even ask for our training background and credentials. I personally have witnessed non-certified technicians (NCTs) in the medical field, and it is very concerning to think that the state would even allow someone with so little training to perform tests involving the use of ionizing radiation to the general public. From what I have personally witnessed, NCTs have no idea about the technique factors they are setting and take suboptimal images.

In the Sunset Advisory Commission's Staff Report- Issue 3, it is noted that deregulation would have little to no impact on public safety. I suppose this assumption may hold true in regards to deterministic effects; however, ionizing radiation is also stochastic. An example of a stochastic effect of radiation would be cancer. Although stochastic effects are random, the likelihood of an individual developing cancer from radiation increases with exposure. In fact, the U.S. EPA makes the conservative assumption that an increase in radiation exposure is associated with an increased risk of stochastic effects ([http://www.epa.gov/radiation/understand/health\\_effects.html](http://www.epa.gov/radiation/understand/health_effects.html), 2012). Just because we do not see immediate harmful effects of radiation does and should NOT imply that it cannot be dangerous and have serious, even fatal, long-term effects. Licensed radiologic technologists administer ionizing radiation, a known carcinogen, in the lowest dose possible to patients in order to create medical images and to treat cancers and other illnesses.

Unlicensed personnel do not know how to administer low doses of radiation and still achieve quality images or effective treatments. As I mentioned above, I know this is true from personally witnessing unlicensed personnel taking X-rays.

Licensure for radiologic technologists preserves the state's right to penalize 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. Are you comfortable with an individual with very little to no training performing tests with the use of ionizing radiation to your children and loved ones? Do you want the person caring for your family member to be held to a "gold" standard, or have the bare minimum in regards to regulation and training?

Any Alternative or New Recommendations on This Agency: I strongly suggest increasing regulations in the state of Texas so that only MRTs can take X-rays. I moved to Texas from a different state, and I had never heard of an NCT until I moved here. I thought Texas would have equal to or even better regulations than the state where I previously lived, but I certainly had the wrong impression.

My Comment Will Be Made Public: I agree