

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Friday, June 20, 2014 1:01:14 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Friday, June 20, 2014 11:41 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Friday, June 20, 2014 - 11:40

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Cynthia

Last Name: McCauley

Title:

Organization you are affiliated with:

City: Houston

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: I support the Texas Sunset Advisory Commission's recommendation for the discontinuance of the Medical Radiologic Technologist Licensure Program and repeal of licensure standards in Texas. The creation of this program resulted in many LMRT programs cropping up in the state of Texas, in which students paid large amounts of money to complete their education with these programs and not be able to find a job upon "graduation." Facilities that receive reimbursement from Medicare must have ARRT licensed technologists; if you have an ACR accreditation you also have to have ARRT registered technologists. The only place a person with a LMRT license can go to work is possibly a physician's office. An LMRT working in a physician office will only be performing exams that result in very low limits of ionizing radiation to be imparted to a patient. This is very different than someone that works in a cath lab or other fluoro area in which large amounts of radiation is emitted during an exam, thus requiring an ARRT registered technologist trained in the proper use of ionizing radiation. As an educator and an imaging director I feel that students attending these limited licensure programs are being dupped into thinking they would be fully qualified to act as a radiologic technologist when completing training. ARRT requires that technologists continually update their knowledge with their continuing education requirements. TDSHS requiring the same thing is simply a duplication of something that is already required by our national credentialing agency. There are many technologists whose reporting periods do not coincide with the ARRT reporting periods, thus requiring all 24 hours of continuing education to be completed in a short few months in order for the training to be accepted by both entities. It is unreasonable to think that technologists will spend money and take their time to duplicate continuing education efforts just because the two reporting periods do not coincide. With all the government regulations and accreditations now required for reimbursements, almost all facilities require ARRT registered technologists be hired. The TDSHS MRT licensure program is simply not necessary; The American Registry of Radiologic Technologists is the national licensing board for the profession, and their JCERT certified

programs do an excellent job of training technologists in the proper use of ionizing radiation. ARRT trumps TDSHS LMRT program by leaps and bounds.

Any Alternative or New Recommendations on This Agency: Please allow this program to sunset.

My Comment Will Be Made Public: I agree