

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, June 24, 2014 4:11:09 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, June 23, 2014 7:17 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 23, 2014 - 19:16

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: FRANCIS

Last Name: OZOR

Title: DIRECTOR, MEDICAL RADIOLOGIC TECHNOLOGY PROGRAM

Organization you are affiliated with: LONE STAR COLLEGE - MONTGOMERY

City: CONROE

State: Texas

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

My name is Dr. Francis Ozor, and I am the Director of Lone Star College - Montgomery, Medical Radiologic Technology program. I support state licensure, and am opposed to the deregulation of Medical Radiologic Technologists for the following reasons:

1. Ionizing radiation has a high potential to cause cancer and adverse genetic/somatic effects if improperly administered by incompetent, improperly trained, and unregulated medical imaging providers.
2. The Joint Review Committee on Education in Radiologic Technology (JRCERT) is the agency recognized by the United States Department of Education and the Council on Higher Education Accreditation to accredit educational programs in radiography, radiation therapy, and medical dosimetry. Not all medical imaging educational programs are accredited by the JRCERT because many of them are not willing to meet the agency's accreditation standards. Deregulation will give the like of these JRCERT unaccredited educational institutions the green light to proliferate, and this will have a huge negative impact on public health and safety.
3. An important goal of many JRCERT unaccredited educational institutions is to make profit with little concern on the training of highly competent medical imaging professionals who are knowledgeable in handling and administering ionizing radiation.
4. The JRCERT does not regulate the hiring of medical imaging professionals. Although major hospital may operate in a highly regulated environment, there are numerous outpatient clinics, doctor's offices, and stand-alone imaging centers that do not. Many of these are probably wishing for deregulation to become a reality to enable them hire inappropriately trained, unregulated persons, AT LOW WAGES, to deliver ionizing radiation to patients.

5. Regulation/licensure promotes the hiring of appropriately trained medical imaging professional, and this would result in better patient protection against the hazards of ionizing radiation.
  6. The bulk of consumers do not have access to enough information to enable them to make informed choices regarding the medical imaging industry/field or the qualifications of medical imaging technologists. Many of the consumers may not have the luxury of time or resources that would grant them access to the information necessary for making informed decision. Most consumers of medical imaging are sick patients whose greatest desire is to receive quality care from qualified professionals. Deregulation has a high potential to result in the proliferation of persons who are not qualified to provide that quality care.
  7. In a nut-shell, deregulation of Medical Radiologic Technologists will have a huge negative impact on public health and safety. Please don't do it.
- Licensure is a good policy that promotes good radiation protection and quality medical imaging services.

Any Alternative or New Recommendations on This Agency: Keep state licensure, and continue to regulate Medical Radiologic Technologists in the State of Texas.

My Comment Will Be Made Public: I agree