From: Sunset Advisory Commission
To: Janet Wood
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, June 18, 2014 1:13:06 PM

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From: sundrupal@capitol.local [mailto:sundrupal@capitol.local]
Sent: Wednesday, June 18, 2014 1:13 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 18, 2014 - 13:12

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Shelley

Last Name: Pearson

Title: Program Director - Radiologic Technology

Organization you are affiliated with: Blinn College

City: Bryan

State: Texas

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

I am writing to strenuously object the removal of state licensure for Medical Radiologic Technologists. After reading the documents, it is apparent the Commission misunderstands or has a misperception of 'outside regulations'.
There is no national licensure requirement for radiologic technologists, there is a recognized private organization that certifies and maintains a national registry of certification if a person so chooses but it has no governmental affiliation or authority to require its certification.
(https://www.arrt.org/State-Licensing/Licensing-vs-Certification-Registration)
Thus, eliminating state licensure for individuals responsible for administering radiation to the public is extremely irresponsible and poses a threat to the health of Texas citizens. This is especially concerning with the recent Texas Administrative Code additions regarding radiation safety as well as existing code with training requirements for other non- radiologic technology professionals such as RN's and Podiatry Techs who perform radiographic procedures. (See Texas Administrative Code §289.227 and Title 25, Part 1, Ch.40 rule 140.522) In addition, most accreditation entities such as The Joint Commission do not require licensed diagnostic technologists in general imaging and explicitly exclude general diagnostic technologists from the verbiage of standards. In fact, The Joint Commission has adopted rules for Computed Tomography (CT) technologists and Nuclear Medicine Technologists but have postponed final implementation until at least 2015 to assess the need for more radiation safety training.
(http://www.jointcommission.org/standards_information/prepublication_standards.aspx).
Personally, I have three points of reference from which to speak as an expert in this discussion:
First and foremost, as a licensed Radiologic Technologist, I have the educational background to make informed assessments and decisions regarding proper positioning and use of lowest amount of radiation possible to produce a quality image. This is crucial as our profession transitions to a digital environment where image appearance on the

computer monitor does not correlate with the amount of radiation received as traditional film would be too “light or dark” depending on amount of radiation received. This alone takes the only non-education based reference from a lay-person “pushing the button”. Also radiation safety is constantly in the news, primarily for overexposure issues – See California) and is of great public concern, thus the criteria for discontinuance of standards for licensure as having “little impact on public health or safety” is grossly negligent from a public safety point of view.

Second as an educator for the past 10 years, I cannot begin to describe the amount of knowledge a qualified technologist must learn and retain. It is difficult to compress the necessary information from the American Society of Radiologic Technologist’s Radiography Curriculum (ASRT) (2012) and essential professional content specifications identified by the American Registry of Radiologic Technologists (ARRT) in 2014 into two years. In fact, the ASRT Position Statement of Resolution C-07.09.2007 that the associate degree is the entry-level for radiographers. Without licensure requirements, prospective technologists would no longer have the impetus or need for formal education. The idea that zero training would be required for anyone operating radiation producing equipment, never mind the entire patient care/procedural essentials, is truly frightening.

Finally, I spent four years working in Alaska which is a non-licensure state.

They require licensure to cut hair but not perform radiation producing images. It was very enlightening as one of the few technologists in my geographic region with a license, I would frequently receive calls from other facilities on how to correct issues. One instance really shocked me and as an educator and public speaker, I still relay the story 15 years later.

While working, I had a “technician” at a clinic call and ask my advice on how to adjust for a skull radiograph on an 8 year old child. She said she had taken the “picture” 8 times and couldn’t get it to “come out right”. Her mentality was that of someone using a digital camera and pushing different buttons to get a better picture. The child was the one who suffered, and without state licensure, the parents had no recourse. The patient was eventually transported by air medi-vac at considerable expense for additional studies because there was no common language for me to assist.

I would ask everyone on the Sunset Commission that before making your decision, ask whether you are willing to trust the person performing the x-ray on you or your child when they disappear behind the LEAD wall to select parameters and make the exposure given the fact that you will be taking away the guarantee of any minimum knowledge requirements.

I conclude by saying I understand the lack of manpower and ability to follow up on complaints, the overall scope of having an additional state license mechanism has compounded this issue of oversight. It is not necessary for Texas to have its own licensure just code requiring some form of minimal nationally recognized license. For example, the State of Colorado does not require a state license but does require national, “Colorado radiation control regulations require registration from ARRT, NMTCB or ISCD; no license is issued by the state” (http://www.asrt.org/main/standards-regulations/state-legislative-affairs/individual-state-licensure-info)

At the very least The Sunset Commission should consider tabling the MRT component until a state law or administrative code can be enacted requiring national general licensure ensuring the safety of Texas citizens.

Any Alternative or New Recommendations on This Agency:

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This link has detailed information on how licensure is maintained in each state and may offer insight on possible solutions to the oversight dilemma.

My Comment Will Be Made Public: I agree