

**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 10, 2014 8:02:24 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, June 09, 2014 7:52 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Monday, June 9, 2014 - 19:51

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Dillon

Last Name: Pyron

Title: BS, RT(R)

Organization you are affiliated with: self

City: Austin

State: Texas

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

The recommendation to eliminate licensing for radiographic technologists ignores some significant facts about the profession. Not all technologists work in a healthcare facility that receives frequent or even occasional inspection by Federal or State authorities. Improper x-rays can result in two different situations, but with similar undesirable endings. Without the proper training and credentials the person taking the x-rays may cause severe injury through over exposure, which may not become evident for years. Or an improperly exposed image may cause the physician to not see or misinterpret the patients condition. In many situations the technologist operates in an environment where there are no other qualified x-ray technologist present and the potential for inspection by State or Federal organizations is low. While by no means a devious intent, pricing pressures on small medical practices might result in someone being hired to "also" take x-rays.

Using CRT and MRI as examples ignores that fact that these are, in fact, used in large facilities and typically require extensive training beyond that provided to an x-ray technologist just to operate the equipment. But these technologists account for less than half of all technologists in Texas, and they may also operate in areas where these skills are not called for.

Without a licensing requirement, many small doctors offices might wind up saving the salaries spent on a licensed technologist by using someone with little or no training. Taking x-rays may look easy, but the training is actually quite extensive and intense.

Depending on a requirement such as ARRT registry begs the question of how the State will verify that. The licensing process for the individual is neither onerous nor time consuming but provide, I believe, an additional assurance to the public that the person their x-rays is, in fact, well qualified to perform the task. In addition, it

enables the State to sanction individuals who do not act in the best and safest interests of the public.

Respectfully,  
Dillon Pyron, BS, RT(R)

Any Alternative or New Recommendations on This Agency: Medical licensing is not an appropriate area to depend on market forces to ensure the safety of the public.

My Comment Will Be Made Public: I agree