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 4:06:37 PM

-----Original Message-----
From: sundrupal@capitol.local [mailto:sundrupal@capitol.local]
Sent: Monday, June 23, 2014 9:49 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 - 21:48

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Marie

Last Name: Racine

Title: Radiation therapist and educator

Organization you are affiliated with:

City: El Paso

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:
June 21, 2014

Marie L.A. Racine, MSRS, R.T. (R)(T)

El Paso, TX

On behalf of self

Dear Texas Sunset Commission:

I am a radiation therapist and an educator in radiation therapy technology writing in OPPOSITION of the Sunset Advisory Commission's Staff Report – Issue 3-recommendation to discontinue medical radiologic technologist (MRT) licensing.

I have been an educator in the radiologic sciences for 35 plus years and a certified radiologic technologist by the American Registry of Radiologic Technologists (ARRT) beginning in radiography (1961) then crossed over into radiation (1967). I am currently an educator for a radiation therapy associate degree program. Notably, I could be retired however, because I strongly support and advocate education and training so that our patients (citizens of Texas) are x-rayed or treated by individuals who meet education and certification standards.

Also, I have served in several capacities for my professional associations and was appointed to the MRT Advisory Board when the Act was implemented in 1987. Then I was re-appointed several times and served as Chair for all but two years of my tenure. I share this to emphasize the importance of licensing and regulating radiologic technologist. Before 1987, there were no Texas State requirements or proof of educational or training standards or other requirements. Unqualified personnel did not have formalized education to administer:

low doses of radiation,
they lacked knowledge on how to evaluate patient's medical status,
obtaining appropriate history,
underlying pathologic processes,
and physical factors to create a quality diagnostic image or radiation therapy that should be individualized for that patient.

As a result many imaging procedures both in hospitals, clinics and private practices were known to be performed by unqualified personnel. Unlicensed personnel increased the potential for inconsistent or improperly positioned images, reducing the diagnostic effectiveness of exams and increasing the need for repeat imaging procedures. Repeat imaging increases radiation exposure and medical costs.

Also there was no mechanism in place to provide disciplinary action for individuals who may not have treated patients according to professional standards or administer radiation correctly. Without licensure, the state could not protect the citizens from untrained individuals.

While we (the Board) developed the Rules for the Act we were appraised to many examples of inconsistent and inaccurate practices. Once the Act had been implemented and enforced we started to see the results of individuals and practices benefiting from more technically consistent and correctly performed radiologic procedures. Subsequently, Texas citizens have been allowed to experience imaging and treatments by licensed RTs who are highly trained individuals that have passed national certification, met ethical requirements, and have had the necessary training required to deliver a proper dose of radiation, a known carcinogen.

It is imperative that the State of Texas continue the licensing and regulation of radiologic technologist.

Licensure for radiologic technologists ensures that patients are being treated by individuals who have met education and certification standards.

Licensure for radiologic technologists administer ionizing radiation, a know carcinogen, in the lowest dose possible to patients to create medical images, therapeutic high dose to treat cancers and other illnesses. As diagnostic imaging increases due to the increasing age of the population, more complex studies are being used to diagnose illness; state licensure of radiologic technologist should remain to protect the health and safety of Texas citizens.

Licensure for radiologic technologists preserves the state's right to provide disciplinary action for 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.

Licensed radiologic technologists provide radiologists and other healthcare providers with technically consistent, correctly positioned for procedures and other pertinent factors ensuring consistent diagnostic and therapeutic outcomes.

Licensed radiologic technologists adapt procedures and technical factors to each individual patient's needs. The radiologic technologists' training allows for technologist and therapist to evaluate the patient's medical and physical status, other pertinent related

factors to create quality diagnostic studies or radiation therapy treatment that is indeed individualized for that patient.

Thank you for your time and consideration of my strong recommendation that the State of Texas continue the licensing and regulations of RTs and other health professionals performing any ionizing procedures on our Texas citizens.

Sincerely,
Marie L.A. Racine, MSRS, R.T. (R)(T)

Any Alternative or New Recommendations on This Agency: enforcement of NCTs

My Comment Will Be Made Public: I agree