

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#); [Brittany Roberson](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Monday, June 09, 2014 5:24:03 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Monday, June 09, 2014 5:11 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 - 17:10

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Kameka

Last Name: Rideaux

Title: Radiographer and Radiation Therapist

Organization you are affiliated with: Texas Society of Radiologic Technologist

City: Houston

State: Texas

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

I am Opposed to the Texas Sunset Commission report regarding the deregulation of radiologic technologists. The Texas Society of Radiologic Technologists (TSRT) wants to make our position known regarding the Sunset Advisory Commission Report. We strongly oppose any efforts to deregulate radiologic technologists in the state of Texas. Medical imaging procedures can be lifesaving, but conversely cause considerable harm to patients. The Sunset Advisory Report asserts that deregulation of Medical Radiologic Technologists would have little impact on public health and safety. Radiologic technologists are at the forefront of patient safety and quality. It is our view that deregulation of radiologic technologist recommended by the Sunset Advisory Committee would increase the risk of medical errors and misadministration of radiation.

The failure to pass the Consistency, Accuracy, Responsibility and Excellence (CARE) bill, which would establish national certification standards, has positioned radiologic technologists to be regulated at the state level.

Presently, no federal oversight exists for radiologic technologists; therefore the state of Texas now serves as the last line of defense for consumers of healthcare. In reality, there are healthcare facilities that fail to operate under the guidelines of a nationally recognized accreditation programs. Despite the intentions of the commission to mitigate issues, it will only create a healthcare environment that compromises the safety of patients. TSRT would like to highlight these three points listed below:

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

Licensed radiologic technologists administer ionizing radiation, a known carcinogen, in the lowest dose possible to patients in order to create medical images and to treat cancers and other illnesses. Unlicensed personnel do not

know how to administer low doses of radiation and still achieve quality images or effective treatments.

Licensure for radiologic technologists preserves the state's right to penalize 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.

While there is no way to totally eliminate risk, we can reduce the risk for patients receiving medical imaging procedures or radiation treatments in the state of Texas through the licensure of professionals

Any Alternative or New Recommendations on This Agency: I recommend that we be moved under the Texas Department of Licensing and Regulation.

My Comment Will Be Made Public: I agree

**Meeting of the Texas Sunset Advisory Commission**

**June 24-25, 2014**

**TSRT Statement in Support of Continuance of the Texas Medical Radiologic Technologist Certification Program**

**Kameka Rideaux, MBA RT(R)(T)**

**TSRT President**

Senator Nelson and Members of the Sunset Advisory Commission:

The Texas Society of Radiologic Technologists (TSRT) is a state organization representing medical imaging and radiation therapy professionals in Texas. We appreciate the opportunity to comment during this review process. TSRT wants to request that the committee reconsider any efforts to discontinue the licensure program for radiologic technologists in the state of Texas.

Medical imaging procedures can be lifesaving, but conversely can cause considerable harm to patients if not administered properly. The Sunset Advisory Report asserts that discontinuing state licensure of Medical Radiologic Technologists would have little impact on public health and safety. Radiologic technologists are at the forefront of patient safety and quality. It is our view that discontinuing the state licensure of radiologic technologist recommended by the Sunset Advisory Committee would increase the risk of medical errors and misadministration of radiation.

Unfortunately, there are no established national standards to regulate radiologic technologist, this must be regulated at the state level. Texas is the last line of defense for consumers of healthcare in this state. There are healthcare facilities in Texas that do not operate under the guidelines of nationally recognized accreditation programs.

“Most Texans assume that the person delivering radiation therapy treatments or taking their x-rays are qualified professionals”. We have an opportunity to ensure that our citizens are treated or imaged by qualified radiologic technologists.

The sunset committee asserts that many other technical positions in the healthcare field are staffed by practitioners such as anesthesiologist assistants and dialysis, surgical, and laboratory technicians whose professions are not state-regulated.

Let's examine this; currently Texas is number 1 in the nation for Clinical laboratory improvement amendments sanctioned labs for six years. In 2012, 7 Texas labs had their Clinical laboratory improvements amendments licenses revoked or suspended, which means these labs had significant deficiencies that were neglected for 2-3 years before being closed? Four of these labs were pediatric clinics. This represents high risk to public health and inadequate regulation.

To suggest that other allied health professionals should follow the under-regulated standards set for laboratory professionals is dangerous.

- Licensure for radiologic technologists ensures that patients are being treated by individuals who have met education and certification standards.
  
- Licensed radiologic technologists administer ionizing radiation, a known carcinogen, in the lowest dose possible to patients in order to create medical images and to treat cancers and other illnesses. Unlicensed personnel do not know how to administer low doses of radiation and still achieve quality images or effective treatments.
  
- Licensure for radiologic technologists preserves the state's right to penalize 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.

While there is no way to totally eliminate risk, we can reduce the risk for patients receiving medical imaging procedures or radiation treatments in the state of Texas through the licensure of professionals.

On behalf of the licensed and registered technologist in Texas, please maintain regulation of medical radiologic technologists under the Department of State Health Services (DSHS) or transfer regulation to Texas Department of Licensing and Regulation.

Sincerely,  
Kameka Rideaux, MBA, RT(R)(T)  
TSRT President