

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, June 26, 2014 8:50:07 AM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, June 25, 2014 7:30 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 25, 2014 - 19:30

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Micheal

Last Name: Ruthemeyer

Title:

Organization you are affiliated with:

City: HOUSTON

State: Texas

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

OPPOSED.....I oppose the recommendation to remove X-ray Technologist Licensure based on the concept that some other non-governmental body will be able to take this on. To my knowledge all accrediting bodies refer to State X-Ray Licensure to set the accrediting requirements. If there is no Texas State X-ray Licensure then the accrediting body cannot regulate who performs x-rays. Additionally, to my knowledge there is no legal requirement requiring doctor's offices to be accredited by any body, and as such then anyone could perform x-rays without any training in Texas.

Recently, Texas has enacted new regulations requiring physicians who want to perform invasive fluoroscopy in Texas to acquire 8 hours of classroom instruction and 2 hours of hands on training.

It makes absolutely no sense for physicians who administer radiation to have additional training, yet remove the licensure and training requirements for x-ray technologists who actually administer the majority of radiation dose in the State of Texas.

By removing Texas' legal authority to regulate who can legally perform x-rays in the State of Texas and just hoping that some accrediting body that actually has no "legal" authority to enforce any requirement there will be no requirements, and more importantly no legal ramifications for those who chose not to voluntarily follow the accrediting body's "recommendations."

Any Alternative or New Recommendations on This Agency: My recommendation is that they actually strengthen the current X-Ray Technologist Licensure.

My Comment Will Be Made Public: I agree