

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 19, 2014 1:44:58 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Thursday, June 19, 2014 10:46 AM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 19, 2014 - 10:45

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Jefferson

Last Name: Sickles

Title: Radiologic Technologist

Organization you are affiliated with: Texas Society of Radiologic Technologists

City: Houston

State: Texas

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

Issue 3

The Unmanageable Scope of DSHS' Regulatory Functions Reduces Needed Focus on Protecting Public Health.

Key Recommendations

- Discontinue 19 regulatory programs currently housed at DSHS.
- Transfer 12 regulatory programs from DSHS to the Texas Department of Licensing and Regulation, and reconstitute associated independent boards as advisory committees.

I am strongly opposed to the above recommendation in the interest of public safety. The use of ionizing radiation in medical imaging requires extensive knowledge and responsibility to prevent unnecessary exposure to known carcinogens. State licensure ensures that personnel working in this critical area have the training and competency to safely image patients. Licensed technologists receive extensive instruction in proper exposure methods and understand their responsibility to achieve the optimal image using the lowest radiographic technique possible. Moreover, licensure provides the state of Texas with the authority to sanction licensed technologists who fail to meet the standards of practice. Removing this important safeguard exposes the health care consumer to unnecessary radiation exposure risks and eliminates the state's ability to take punitive action against non-compliant or incompetent technologists.

Any Alternative or New Recommendations on This Agency: I strongly urge the commission to abandon this course of action. It is in the interest of the general public to maintain state licensure and regulatory control over the radiologic profession in Texas.

My Comment Will Be Made Public: I agree