

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, June 18, 2014 1:14:31 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Wednesday, June 18, 2014 1:00 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Wednesday, June 18, 2014 - 12:59

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Linda

Last Name: Stephenson

Title: RT (R) CVT

Organization you are affiliated with: Director - CVC Cath Lab

City: Tyler

State: Texas

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

Linda H. Stephenson, RT( R ) CVT

Testimony of Linda H. Stephenson  
and on behalf of the  
Medical Radiological Technologists of the state of Texas

**IN OPPOSITION OF THE SUNSET ADVISORY COMMISSION'S STAFF REPORT- ISSUE 3-  
RECOMMENDATION TO DISCONTINUE MEDICAL RADIOLOGIC TECHNOLOGIST LICENSING.**

Before the Texas Sunset Commission Public Hearing

To: Sen. Nelson, Rep. Price, Sen. Birdwell, Rep. Burkett, Sen. Hinojosa, Rep.  
Dutton, Sen. Patrick, Rep. Gonzales, Sen. Schwertner, Rep. Raymond, Dr.  
Buckingham, Mr. Luce

An educated, highly trained, licensed, radiologic technologist (RT), also known as medical radiation technologist or as radiographer, performs imaging of the human body for diagnosis or treating medical problems or issues. Radiologic technologists work in hospitals, clinics, and private practice. A radiologic technologist uses his or her expertise and knowledge of patient handling, physics, anatomy, physiology, pathology and radiology to assess

patients, develop optimal radiologic techniques and evaluate resulting radiographic images.

Thirty-nine states currently recognize and have legislation on those delivering a dose of radiation to achieve optimal radiographic images or treat patients. By maintaining licensing of RTs in Texas, it ensures that all patients are receiving care in radiology from highly qualified, trained individuals that have passed national certifications, met ethical requirements, and have had the necessary training required to deliver a proper dose of radiation. And, as you all know, radiation is a known carcinogen. As diagnostic imaging increases due to the increasing age of our population, more complex studies are being used to diagnose illness. State licensure of radiologic technologists should remain in force to protect the health and safety of all 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 has no way to protect its citizens from untrained individuals administering damaging, even lethal doses of radiation.

Licensed radiologic technologists provide radiologists, cardiologists, neurologists, surgeons and other healthcare providers with technically consistent, correctly positioned images, which improve the consistency and accuracy of the providers' diagnosis. Licensed radiologic technologists perform CT exams, MRI studies, Cardiac catheterizations, radiation therapy, nuclear therapy, vascular studies and pediatric exams. All licensed radiologic technologists have the knowledge to adapt procedures and technical factors to each individual patient's needs. Our training allows us to evaluate the patient's medical status, patient's history, underlying pathologic processes, and physical factors to create a quality diagnostic image or therapy that is truly individualized for that patient.

Unlicensed personnel have the potential to provide 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 potential damage to human tissue. Trained individuals always take into account the specific safety issues involved in administration of ionizing radiation. Could you possibly imagine the implications of untrained lay people performing radiologic exams in a pediatric office, or pediatric offices all over the great state of Texas? Do any of you realize that every female child is born with all the ova she will ever have, and if these ova are not protected from unnecessary radiation exposure the chances of her ova being damaged are very likely? These are but a few things Medical Radiological Technologists are taught in school. We all know proper shielding techniques. We all know just how to properly position that area of the body to get the exact exam necessary with the least exposure...on the first try. Deregulation would leave the people of Texas open to huge risks, and I urge you all to reconsider this terrible decision.

Would you subject your 2 year old daughter or granddaughter to numerous repeated radiation exposures by an untrained, unlicensed individual? Of course you wouldn't. You would insist on someone who is trained specifically to care for your child and her particular needs. Please allow us to care for your children, your families, and your selves. We have the training and the knowledge to keep you safe.

Kindest Regards,

Linda H. Stephenson, RT ( R ) CVT

Any Alternative or New Recommendations on This Agency: If the Texas Sunset Advisory Commission wishes DSHS to discontinue the Medical Radiologic Technologist Licensure Program due to saturation of the department, I suggest they transfer the program to the Texas Department of Licensing and Regulation for all further management.

My Comment Will Be Made Public: I agree