

**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 1:53:26 PM

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

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Thursday, June 19, 2014 1:30 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Thursday, June 19, 2014 - 13:30

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Melanie

Last Name: Wilbanks

Title: R.T. (R)(ARRT)

Organization you are affiliated with:

City: Cypress

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:  
To whom it may concern:

I strongly oppose the recommendation that Texas discontinue the Medical Radiologic Technologist Licensure Program. This recommendation places harmful radiation in the hands of untrained and uneducated individuals.

Radiology Technologists are required to attend accredited schools by the American Registry of Radiologic Technologists. We are taught to do no harm using the least amount of radiation to provide diagnostic quality images for our patients. We also adhere to strict ethics and rules set by the ARRT. This provides the patient with a safe environment for diagnostic testing.

An unlicensed practitioner would not be required to follow these same rules or regulations. Nor would the unlicensed individual without the same education or experience have the knowledge to practice patient safety with regards to radiation.

There appears to be a new trend of urgent care facilities training their medical assistants to perform radiographic exams on patients, including the pediatric population. It is unsafe and extremely dangerous that an individual with no formal radiographic education is allowed to expose vulnerable patients such as children with something that can be dangerous and carcinogenic.

Radiology Technologists, do more than take pictures. We produce ionizing radiation (a known carcinogen) for the use of obtaining a diagnostic image or treating a cancer. This requires the knowledge of the physics behind the equipment and the creation of the actual radiation used. The unlicensed

person would not have the education to perform properly and competently resulting in injury or very possibly death to the innocent patient.

Licensure for Radiology technologists preserves the right to penalize individuals who are practicing dangerously or inappropriately and taking away that license would take this right away. Taking away our licensure devalues the education and the credibility that all 28,000 registered radiology technologists in the state of Texas worked so hard to earn and the medical field that we are all so passionate about.

Any Alternative or New Recommendations on This Agency: Use licensed professional to perform radiologic procedures.

My Comment Will Be Made Public: I agree