

From: [Sunset Advisory Commission](#)
To: [Janet Wood](#)
Subject: FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Tuesday, June 24, 2014 3:53:30 PM

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From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]
Sent: Tuesday, June 24, 2014 12:10 PM
To: Sunset Advisory Commission
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 24, 2014 - 12:09

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: Mary

Last Name: Willis

Title: R.T.(R)(MR)

Organization you are affiliated with: ARRT, ASRT, MRT, SMRT, BS&W Radiologic Technology

City: Killeen

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed: Recommendation 3.2 – De-licensure of Radiologic Technologists (RTs). If state licensure can prevent physicians from training anyone they want to take radiographs, be it nurses, front desk staff or even themselves, then licensure is a MUST!!! There is logic behind the training of nationally registered RTs. The rationale for completing mandatory clinic experience and an exhaustive 2-year educational degree program is this: Comprehension of Radiation Safety is a misunderstood necessity in our medically valuable career-field. Just because patients cannot see, feel or smell radiation at the time of exposure does not mean they are not vulnerable to often horrific and death related radiation injuries. Bottom-line: With no regulatory State oversight or “PENALTY” to deter physicians, hospitals or privately operated urgent care and mobile units from using non-certified RTs, de-licensure of RTs will result in potentially serious health injuries to the Texas public exposed to incorrect radiation doses, administered by un-trained individuals. While there is merit for the Sunset Commission to review this recommendation, I believe that de-licensure of Radiologic Technologists in Texas, at this time, would be a severe lapse in the Commission member’s judgment based on recorded severity of damage that radiation, in the “wrong-hands,” can do to the human body, particularly the unborn fetus.

Any Alternative or New Recommendations on This Agency: Be proactive at ensuring the safety of the Texas General Public by retaining State regulatory oversight in whatever form, or whichever State run Department can ensure the most optimum outcome. With a recorded Texas DSHS revenue of over one million dollars from Radiologic modality licensing fees alone, there would appear to be some latitude to continue the program effectively.

My Comment Will Be Made Public: I agree