

Delegates Thomas Hutchinson, Joseline A. Pena-Melnyk, Bonnie Cullison, Tiffany T. Alston, Heather Bagnall, Harry Bhandari, Brian Chisholm, Pam Lanman Guzzone, Terri L. Hill, Steve Johnson, Anne R. Kaiser, Kenneth Kerr, Nicholaus R. Kipke, Robbyn Lewis, Lesley J. Lopez, Ashanti Martinez, Matthew Morgan, Teresa E. Reilly, Samuel I. Rosenberg, Kathy Szeliga, Deni Taveras, Jennifer White Holland, and Jamila J. Woods

House Office Buildings  
Annapolis, Maryland 21401

Re: Opposition to HB0934 - Radiation Therapy, Radiography, Nuclear Medicine Technology, and Radiology Assistance - Limited Licensed Radiologic Technologist

Dear Delegates on the Health and Government Operations Committee,

I am writing to strongly oppose HB0934, currently under consideration in the Maryland General Assembly. As a concerned citizen and resident of Maryland, I believe that this proposed legislation presents significant risks and challenges that demand immediate attention.

The introduction of the Limited Licensed Radiologic Technologist profession in Maryland raises serious concerns about public safety and the integrity of our healthcare system. I would like to highlight several reasons why this bill should not be advanced:

1. Limited training and qualifications: Limited Licensed Radiologic Technologists undergo significantly shorter training periods compared to licensed Radiographers, raising concerns about their ability to safely administer ionizing radiation to patients. Given the increasing prevalence of radiation-based medical procedures, it is imperative that we prioritize the expertise and proficiency of healthcare professionals in delivering such treatments. The proposed bill does not require accreditation of training programs, nor does it require continuing education. Fully licensed radiographers are required to obtain at least 24 hours of continuing education biannually. Also, any fully licensed radiographer who has obtained their license starting in 2011 are required to take a Continuing Qualifications Requirements exam similar to the initial board exam every 10 years to ensure that their knowledge, skills and abilities remain current.
2. Patient safety concerns: The limited scope of practice outlined in HB0934 may expose patients to unnecessary risks by allowing individuals with inadequate training to perform radiographic procedures. Ensuring the highest standards of patient care and safety should be paramount in any legislative endeavor related to healthcare professions. The proposed bill states, "Practice limited license radiologic technology means to perform radiographic procedure employing equipment that emits ionizing radiation that is limited to specific areas of the human body." All x-ray machines are the same and can deliver harmful amounts of radiation to patients. With limited training on such machines, the harm to the

community is real. 15 clock hours of radiation protection education is not sufficient to protect patients. Most radiography program students receive over 75 hours of radiation protection education. Moreover, digital equipment in itself does not ensure safer doses - the training of the operator does.

SB0935 does not provide for any competency based clinical learning of procedures, and therefore no evaluation or verification that these individuals will be able to competently perform exams. This will result in poor image quality leading to both a decrease in accuracy of diagnoses, as well as an increase in needed repeat radiographs resulting in increased patient dose.

3. Potential long-term impacts: We have a robust mechanism for licensure for the field of radiography in this state already. Allowing for a Limited License Radiographer will lead to a reduction in the number of available jobs for fully licensed radiographers if medical facilities hired those with limited licenses. Providing a mechanism to obtain a Limited Radiographer License with limited educational needs will potentially decrease the number of students enrolling in our Radiologic Technology programs across the state, jeopardizing the viability of these programs  
The reduced number of fully educated, trained, and licensed Radiologic Technologists will result in a reduction in the number of technologists qualified to get licensed in advanced modalities, such as mammographer and computed tomography, resulting in a shortage of these technologists and a decrease in access to these services.
4. Addressing shortages through alternative means: Maryland already has robust educational programs and mechanisms in place to address shortages in radiologic technologists. Efforts such as expanding clinical rotation experiences and increasing admission numbers to radiography programs demonstrate proactive steps towards alleviating workforce shortages without compromising patient safety. I suggest offering a limited licensure to radiography students after completion of their first year of education. This would not only provide a mechanism to address staff shortages in the short term, but would also ensure that the need for fully trained and licensed radiographers is addressed in the future. After their first year of education, students will have learned the positioning needed for all body parts, plus image production, equipment maintenance and operation, and some radiation protection and safety. This could potentially increase enrollments in Maryland's radiologic technologies programs as students would be able to obtain a job in the field after 1 year while ensuring they remain enrolled in the program since a full license would still be required to work independently.

I respectfully urge you to reconsider the implications of HB0934 and to withdraw support for this legislation. Instead, I encourage a collaborative approach that prioritizes the safety and well-being of Maryland residents while addressing workforce shortages through proven, sustainable methods.

Thank you for considering my concerns regarding HB0934. I trust that you will act in the best interests of our community and uphold the standards of excellence in healthcare delivery that Maryland residents deserve.

Sincerely,

Malachi Thoms