To the Esteemed Members of the Health and Government Operations Committee,

I am reaching out to express my strong opposition to HB0934, presently under review in the Maryland General Assembly. As a concerned citizen and Maryland resident, I am deeply troubled by the potential risks and challenges posed by this proposed legislation.

The introduction of the Limited Licensed Radiologic Technologist profession in Maryland raises significant concerns regarding public safety and the integrity of our healthcare system. I wish to emphasize several reasons why advancing this bill would be ill-advised:

- Insufficient training and qualifications: Limited Licensed Radiologic Technologists undergo notably abbreviated training compared to licensed Radiographers, raising doubts about their ability to safely administer ionizing radiation. Given the increasing prevalence of radiation-based medical procedures, it is essential to prioritize the expertise and competence of healthcare professionals in delivering such treatments. The proposed bill lacks requirements for accredited training programs or continuing education, unlike fully licensed radiographers who are mandated to undergo at least 24 hours of biannual continuing education. Additionally, fully licensed radiographers who obtained their license post-2011 are obligated to take a Continuing Qualifications Requirements exam every decade to ensure their knowledge remains current.
- 2. Concerns for patient safety: The limited scope of practice outlined in HB0934 may expose patients to unnecessary risks by permitting individuals with inadequate training to conduct radiographic procedures. Safeguarding the highest standards of patient care and safety should be paramount in any legislative action pertaining to healthcare professions. The proposed bill's definition of "Practice limited license radiologic technology" indicates a narrow focus on specific areas of the human body for radiographic procedures, which may lead to inadequate protection for patients. Furthermore, the absence of competency-based clinical learning in SB0935 raises concerns about the quality of exams and potential harm to patients due to poor image quality and increased radiation exposure.
- 3. Potential long-term consequences: Maryland already boasts a robust licensure mechanism for radiography. Introducing Limited License Radiographers could lead to a reduction in available jobs for fully licensed radiographers, potentially diminishing enrollment in Radiologic Technology programs and exacerbating workforce shortages in advanced modalities. This could ultimately result in decreased access to essential services such as mammography and computed tomography.

4. Alternative approaches to address shortages: Maryland has effective educational programs and strategies in place to tackle workforce shortages in radiologic technology. Initiatives like expanding clinical rotation experiences and increasing admission numbers to radiography programs offer proactive solutions without compromising patient safety. One suggestion is to offer limited licensure to radiography students after their first year of education, enabling them to address short-term staffing shortages while pursuing full licensure. This approach could also incentivize enrollment in radiologic technology programs, ensuring a steady supply of fully trained and licensed radiographers in the future.

In conclusion, I respectfully urge you to reconsider support for HB0934 and instead pursue a collaborative approach prioritizing the safety and well-being of Maryland residents while addressing workforce shortages through proven, sustainable methods.

Sincerely,

Mia Martin