



Leading Radiology Forward
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TO: The Honorable Joseline A. Pena-Melnyk, Chair
The Honorable Bonnie Cullison, Vice Chair
Members, House Health and Government Operations Committee

FROM: Steve Forthuber, President Eastern Operations

DATE: March 1, 2024

RE: **Favorable with Amendments:** House Bill (HB) 934 -- *Radiation Therapy, Radiography, Nuclear Medicine Technology, and Radiology Assistance - Limited Licensed Radiologic Technologist*

RadNet leads the nation in outpatient diagnostic imaging services with nearly 400 centers in eight states. RadNet has a major presence in Maryland and our Eastern Operations are headquartered in Baltimore. You may know us locally as Advanced Radiology, Community Radiology Associates, and American Radiology Associates with over 60 imaging centers throughout the state. RadNet employs nearly 1,000 Radiologic Technologists (RT) in total across all of our Maryland imaging centers.

HB 934 would create a limited licensed radiologic technologist who would be permitted to perform x-ray examinations of select anatomic area(s) after completing: (1) a total of 50 hours of education and clinical training and (2) successfully passing an examination. If passed, HB 934 would go into effect on October 1, 2024.

RTs are highly trained and skilled professionals who play a critical and an integral role in the patient radiologic care team. In contrast to HB 934, RTs have had to successfully complete an 18 to 25-month accredited Radiology program full-time consisting of: (1) 600 to 700 hours of coursework in patient positioning, radiation safety, technology, medical physics, trauma, medical terminology among many other areas and (2) nearly 2,000 hours of hands-on clinical training under the direction of an experienced RT who was specially credentialed as an instructor. RTs then must: (1) pass a rigorous examination administered by the American Registry of Radiologic Technologists (ARRT), (2) obtain a license from the Maryland Board of Quality Assurance in Radiology, and (3) complete at least 24 hours of continuing medical education (CME) every 24 months. The RT designation is the start of a successful and meaningful career in radiology.

RadNet, like many other medical imaging providers, is affected negatively by the current serious shortage of RTs in Maryland and across the nation. Moreover, we heard from stakeholders who need a ready supply of individuals who could perform a limited range of x-ray procedures. Therefore, we appreciate that the bill is trying to offer solutions. Accordingly, RadNet proposes to amend HB 934 by: (1) creating a Limited X-ray Machine Operator (LXMO) designation and (2) adding concrete solutions that would grow the supply of RTs. (See Appendix for details.)

In conclusion, the shortage of RTs in Maryland requires a thoughtful, multifaceted solution that meets the various healthcare providers' need for medical imaging; but does so in the best interests of Maryland patients. RadNet stands ready to work with members of the General Assembly, its leadership, and other stakeholders towards comprehensive approach that puts Maryland patients first.

RadNet appreciates the opportunity to provide this statement before House Health and Government Operations Committee.

Appendix

Solutions for Addressing the Shortage of Radiologic Technologists in Maryland

1. Create a Limited X-ray Machine Operator (LXMO):

- Education and clinical training:
 - Clinical training of LXMO candidates conducted under the personal supervision of a Maryland-licensed Radiologic Technologist
 - Completed a LXMO course consisting of:
 - At least 640 hours of clinical training in the following anatomic areas:
 - Upper Extremity & Pectoral Girdle – 240 hours
 - Lower Extremity – 240 hours
 - Chest – 160 hours
 - At least 260 hours of didactic training consisting of:
 - Medical Terminology
 - Fundamentals
 - Ethics & Laws of Health Care
 - Image Production and Analysis
 - Imaging Equipment and Radiation Production
 - Human Anatomy and Physiology
 - Radiation Protection and Radiobiology
 - Digital Image Acquisition and Display
 - Patient Care in Radiologic Sciences
 - Achieve a passing score of the ARRT limited scope of practice examination
- Post-Training Clinical practice:
 - Supervision: Work under the indirect supervision of a Maryland-licensed Radiologic Technologist or physician with radiation safety training who are immediately available for consultation
 - Continuing education: Require 24 hours of continuing education every two years; including radiation safety and positioning
- Require consumer disclosure that a LXMO is being used to perform the exam
- Consistent with Board of Physicians amendments:
 - Effective date of the legislation: October 1, 2025
 - Sunset after three years

2. Increase the Supply of RTs through Access to Training and Awareness:

- Ensure that there are “bridge programs” available to move from LXMO to full RT licensure
- Work towards a “limited student licensure” to permit RT students who have completed their first year to work in a healthcare facility under the supervision of a licensed practitioner (RT or radiologist)
- Seek Maryland guidance and support to promote radiologic technologist career paths within all Maryland high schools
- Encourage tuition assistance and employer incentives