



American Society of Radiologic Technologists

Delegate Joseline A. Pena-Melnyk
Chair
Heath and Government Operations Committee
Room 241
House Office Building
Annapolis, Maryland 21401

Re: HB 934- Radiation Therapy, Radiography, Nuclear Medicine Technology, and Radiology Assistance - Limited Licensed Radiologic Technologist

March 5, 2024

Dear Chair Pena-Melnyk,

The American Society of Radiologic Technologists represents more than 156,000 medical imaging technologists and radiation therapists across the nation, including 2,630 in Maryland. Our main mission as an organization is to advance and elevate the medical imaging and radiation therapy profession and to enhance the quality and safety of patient care.

Any program of standards for a limited x-ray machine operator (LXMO), whether that is registration or licensure, must include specific elements to ensure only those who have been appropriately educated and trained are performing medical-imaging procedures under the direct supervision of the appropriate healthcare provider. Any performance standard law must include the following.

Recommendation 1, Supervision: Supervision of LXMOs must only be either licensed physician or a full scope licensed radiologic technologist.

Reasoning 1: Advance Practice Nurses and Physician Assistants do not receive the necessary specialized training in radiation safety, radiobiology, radiation physics, patient positioning, or procedure correction to supervise a LXMO. Often, APRNs and PAs have similar training and experience to LXMO in these specialized areas, negating their capability to clinically supervise. Only licensed physicians and full scope radiologic technologists who have achieved nationally recognized credentials have the advanced knowledge of processes and procedures required for clinical supervision.

Recommendation 2, Continuing Education: All limited x-ray machine operators must complete at least 12 hours of continuing education units in areas specific to radiation safety, and the specific areas of anatomy LXMOs perform procedures.

Reasoning 2: Like every profession, medical imaging technology and best practices change over time. It is critical that all healthcare workers performing any kind of medical imaging continue their education to stay current on patient safety practices and evolving technologies. Full scope technologists are required to complete at least 24 hours of continuing education every 2 years; therefore, it is the recommendation of ASRT that LXMOs complete at least 12 hours of imaging-specific continuing education every 2 years.

Recommendation 3, Initial Education: While it is understandable that LXMOs do not complete the full initial education that a radiologic technologist is required to complete, it is critical that individuals wishing to become limited x-ray machine operators complete formal education directed by a full scope radiologic technologist or a radiologist. Areas of education must include at least 25 hours of image production and equipment operation, at least 15 hours of radiation protection, and at least 10 hours of radiographic procedures in the anatomical area.

Reasoning 3: Performance of medical imaging without baseline knowledge puts patients and healthcare providers at high risk of being overexposed to radiation. While ASRT encourages more initial education, the minimum education hours currently listed in SB 830 are on par with states with similar LXMO laws. Formal education taught by instructors who specialize in medical imaging ensures a level of consistency in quality of care that is critical in a functioning healthcare system. The American Registry of Radiologic Technologists offers content specifications for LXMO, and ASRT highly recommends the state utilize these content specs in forming education requirements

Recommendation 4, Competency Exam: Any final law passed to allow for the creation of limited scope technologists must include the ARRT LXMO exam administered by the state.

Reasoning 4: The American Registry of Radiologic Technologists (ARRT) is a nationally recognized credentialing organization for medical imaging and radiation therapy, which administers credentialing examinations for radiologic technologists. The exams they have made available to states for LXMOs are created and reviewed by subject matter experts and ensure that LXMOs working in the state can prove necessary competency. Without a competency exam, there is no guarantee that every individual training to be a LXMO hold equal skill. Additionally, successfully passing a competency exam allows LXMOs to freely move between facilities without having to retrain or the new facility taking the risk of inadequate training.

Recommendation 5: Because the state of Maryland already license full scope radiologic technologists, ASRT recommends that any statute creating standards for LXMO fall under the same section as the other radiologic technologists rather than for this statute to be under the physician delegating section (14-306).

Reasoning 5: Limited X-ray Machine Operators are part of the medical imaging and radiation therapy profession. For the sake of clarity and consistent statute, LXMOs should live in the same section of statute as the rest of the medical imaging profession. As workers move into the state, it is important that these statutes are understandable. By hiding LXMO under physician delegation, it will create confusion on what is acceptable by law. The common person looks to the section on radiologic technologists for the full breadth of the profession, including LXMO.

Creating consistent standards across all health care facilities is the only way to ensure all patients are receiving the highest quality care and ensure that workers are able to successfully move between health care facilities as they as individuals deem appropriate. Entities that are opposed to initial education standards and the requirement of a competency exam are advocating to allow facilities to determine what is the appropriate education and competency exams. As the state is battling workforce shortages, these recommended standards guarantee that employees are not chained to the facility where they received their training, but have proven competency on a nationally created test, and can move within

the state without fear of being unemployable. These recommended standards ensure employability while maintaining the highest quality patient care possible.

ASRT appreciates your commitment to providing patients' access to quality health care services that only individuals that meet national education and clinical standards can provide and looks forward to working with you in the future to achieve this goal. The ASRT firmly recommends that the scope of practice for radiologic technologists in Maryland is not encroached upon to ensure patient safety and high-quality imaging is performed. Please feel free to contact me at mcheck@asrt.org or 800-444-2778; Ext 1314 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "M Check". The signature is written in a cursive, fluid style.

Meredith A. Check, MPP
Manager of Government Relations and Public Policy
American Society of Radiologic Technologists