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Senator Katherine Klausmeier
123 James Senate Office Building
11 Bladen Street
Annapolis, Maryland 21401

Re: Opposition to SB0830 - Radiation Therapy, Radiography, Nuclear Medicine Technology, and Radiology Assistance - Limited Licensed Radiologic Technologist

Dear Senator Klausmeier,

I am writing to strongly oppose SB0830, 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.
2. 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. The introduction of Limited Licensed Radiologic Technologists does not alleviate the job shortage, but in fact, causes greater shortages in hospital radiographer positions, particularly in the advanced imaging departments of cat scan, MRI, mammography, and interventional and cardiology catheterization labs, which are in dire need of staff.
3. Patient safety concerns: The limited scope of practice outlined in SB0830 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, for example.

4. Potential long-term impacts: We have a robust mechanism for licensure for the field of radiography in this state already. If you open the door for the job category of Limited Licensed Radiologic Technologist, you can never close it. These less-trained workers will be able to perform about 50% of the studies that are currently designated to be performed by a licensed radiographer only. Outpatient and urgent care centers will never hire a full radiographer if they can hire a Limited Licensed Radiologic Technologist. Even hospitals will hire less radiographers forever more. Job opportunities for radiographers will decrease and will never recover after the shortage is over. Radiography programs will never be at full capacity as once was. This will decimate the radiography profession in Maryland, a profession that takes three years of comprehensive training and an associate degree, and patients will be at harm. Do not cheapen our profession, especially when it is not needed.

I respectfully urge you to reconsider the implications of SB0830 and to withdraw support for this legislation. My biggest concern as a licensed Radiographer of 8 years is that there isn't a possibility that a mere 50 hours of training will prepare you to become an x-ray technologist. It took my coworkers and I 2 years of hard, intense training. Not only will this put patients at severe risk of increased doses of radiation due to incompetent technologists, this will also affect our work flow in the hospitals. We will essentially have to work beside untrained technologists, it will cause increased stress, and a decline in staffing in Radiology departments.

Thank you for considering my concerns regarding SB0830. 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,

Brittaney Mullins RT(R)