



Board of Physicians

Wes Moore, Governor · Aruna Miller, Lt. Governor · Harbhajan Ajrawat, M.D., Chair

2024 SESSION POSITION PAPER

BILL NO.: SB 830 - Radiation Therapy, Radiography, Nuclear Medicine Technology, and Radiology Assistance - Limited Licensed Radiologic Technologist

COMMITTEE: Finance

POSITION: Letter of Support with Amendments

POSITION & RATIONALE:

The Maryland Board of Physicians (the Board) is respectfully submitting this letter of support with amendments for Senate Bill (SB) 830 - Radiation Therapy, Radiography, Nuclear Medicine Technology, and Radiology Assistance - Limited Licensed Radiologic Technologist. SB 830 would establish a regulatory and licensing system for limited licensed radiologic technologists under the Board of Physicians. The Board thanks Senator Klausmeier for sponsoring SB 830 and looks forward to continuing to work with the Sponsor and stakeholders on this bill.

The Board supports establishing a limited-scope radiologic technologist option in Maryland and other initiatives to strengthen the struggling healthcare workforce and decrease emergency room wait times. However, the Board believes that a license is not the most effective regulatory option. The Board suggests that SB 830 be amended to remove “limited licensed radiologic technology” as a new license category and instead implement a Limited-Scope Radiologic Technologist Registration, with a sunset provision to re-evaluate in three years.

Licensure requires that the fees for a license are set at a rate to cover the cost of licensure. As many of the costs of licensing are fixed no matter how many people apply for the license, when a smaller number of people apply for the license, it can result in high fees for applicants and can be an additional barrier to licensure. A registration differs from a license because there is no Board verification of credentials required; therefore, the Board would not need to expend any additional resources. Given the fact that we are unsure if the population will be large enough to support licensure, the Board believes that registration is the most cost-effective and streamlined way to address limited-scope radiologic technologists at this time.

In addition, the Board is aware of proposed amendments to include chiropractors, advanced practice registered nurses, and podiatrists as authorized supervisors. The Board recommends removing these practitioners because they are not health occupations that are regulated by the Board under Title 14 of the Health Occupations Article, and are regulated by the Board of Chiropractic Examiners, the Board of Nursing, and the Board of Podiatric Medical Examiners. Therefore, any supervisory authority granted to practitioners in those health occupations must be

implemented in their specific practice acts.

The Board is also aware of proposed amendments to include physician assistants (PA) as authorized supervisors. Granting supervisory authority for PAs is incongruent with existing statutory limitations for PAs performing X-ray duties. PAs are limited in the ability to conduct X-ray procedures, may not perform X-rays of the chest or spine, and may perform only “nonfluroroscopic X-ray procedures of the extremities, anterior-posterior and lateral, not including the head,” *See* Health Occupations, § 14-306(e)(2)(iii) and (3)2.A; § 15-302(c)(2)(ii). Delegating supervisory authority to health practitioners with more limited scope in performing X-ray duties than the practitioner they are authorized to supervise conflicts with existing statutory provisions.

In general, SB 830 also needs amendment to clearly state the type of supervision required. It is the recommendation of the Board that supervisors are physically present on-site or on the facility premises and able to respond in person.

The Board would also like to note the effective date of enactment, October 1, 2024. The bill requires the completion of an educational program with a certain amount of clinical and didactic hours. The Board is unaware of any education program in Maryland that satisfies this requirement. Therefore, the Board suggests reconsidering the effective date to allow local educational programs to be established that meet the requirements of this bill.

Thank you for your consideration. For more information, please contact Matthew Dudzic, Manager of Policy and Legislation, 410-764-5042, or Madeline DelGreco, Health Policy Analyst, 443-591-9082.

Sincerely,

A handwritten signature in cursive script that reads "Singh Ajrawat".

Harbhajan Ajrawat, M.D.
Chair, Maryland Board of Physicians

The opinion of the Board expressed in this document does not necessarily reflect that of the Maryland Department of Health or the Administration.