

906 Cherry Hill Road
Street, MD 21154
ephelan@ccbcmd.edu
443-840-2807
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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,

My name is Erin Phelan, and I have been a licensed radiographer for 34 years and a radiography educator for the past 18 years. I strongly oppose Senate Bill 0830. Not only is it dangerous to the health of all Marylanders, but we have also been working on far better solutions to the radiographer shortage in our area.

My program's advisory board consists of all local employers, including LifeBridge, University of Maryland, Medstar, and others. Not once did these institutions suggest limited scope techs. What was suggested was to increase enrollment as much as possible, which we accomplished by establishing 25 new clinical placements for radiography students. Last fall, we increased our incoming cohort from the pandemic classes of 18 students to 41. Moreover, in 2021, we created an Introductory radiography course which serves at least 150 college students a year, to get them interested in the radiography profession. This online, asynchronous course is very popular and almost anyone can take it. Since its inception, 261 students have passed this course.

Another initiative we have been working on with Advanced Radiology is to train Medical Assistants as advanced "tech aids," who can interview patients, help them with exams, and provide patient care. We currently have medical assistant students in clinical rotations for this cooperative enterprise as a pilot program. Radiology-specific tech aides and Radiography program students are extra pairs of hands in busy departments and increasing the amount of each are tantamount to alleviating the shortage, as is bringing back temporary licensure.

Our efforts over the past few years are safer and wiser solutions than the proposed bill, which will only take away applicants to radiography programs and create an even worse shortage. The need for qualified radiographers in CAT scan, MRI, and mammography is even greater than urgent care centers, and this bill will reduce the number of people able to perform your next mammogram.

I am writing to express my strong opposition to SB0830, currently under consideration in the Maryland General Assembly. As a concerned citizen and resident of Maryland, I believe that this proposed legislation poses significant risks and challenges that must be addressed.

The State of Maryland does not need the profession of Limited Licensed Radiologic Technologist. While other states have larger rural areas, our state has many educational programs that can address radiologic technologist shortages when they occur in a cyclical nature over the years. I strongly believe that the introduction of such a job category will introduce significant danger to the community. Here is why:

1. Limited Licensed Radiologic Technologists are trained in about a quarter of the time that licensed Radiographers are. This results in a decrease of skills in delivering ionizing radiation to the public. Since the availability of CT in hospitals and offices has increased over the years, the amount of radiation delivered to patients has increased dramatically. Limited Licensed Radiologic Technologists will increase the amount of radiation to patients significantly, as skills needed to become competent in radiography take eighteen months to two years. Many repeat x-rays will be taken. For example, ambulance drivers do not have the scope of practice to deliver narcotics to patients, and certified nursing assistants are not allowed to deliver medication, but Limited Licensed Radiologic Technologists will be allowed to deliver harmful ionizing radiation to patients?
2. Employers have created their own radiographer shortages over the past few years. Some hospitals limited or blocked clinical rotation experiences for radiography students during the COVID years. In turn, radiography programs were limited in the number of students admitted, which decreased the number of radiographers graduated into the community. The Community College of Baltimore County has been working tirelessly in admitting more students since 2023, by doubling the number of clinical rotation experiences. The CCBC Medical Imaging Advisory Board just voted in October 2023, to keep up the high numbers of admission for at least another two years to circumvent the radiographer shortage. We are already working on solutions.
3. Employers also are not keeping up with radiographer salaries. Young graduates particularly are chasing the money and are not being attracted to hospitals and

offices that are not raising salaries, even with record-breaking profits for mega healthcare corporations.

4. 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. CCBC Radiography students receive over 75 hours of radiation protection education, for example.
5. We have a mechanism for licensure for 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 they once were. 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 was present at the Groundbreaking Ceremony for the Carol Diane Eustis Center for Health Professions on the Community College of Baltimore County's Essex campus. You were one of the dignitaries present, breaking ground for our state-of-the-art building for our state-of-the-art allied health programs. Please do not let one of those programs suffer because of short-sighted business interests. I am working on many solutions for corporate partners to get through this dip of a never-ending cycle of supply of radiographers in the community. We have always gotten through the lower part of this cycle just fine and will swing back to full capacity soon – without the need of this can of worms proposed in SB0830.

Thank you for considering my perspective on this matter. I respectfully urge you to withdraw SB0830 and to prioritize the well-being and interests of Maryland residents.

Sincerely,

Erin Phelan

Erin Phelan, MA, RT(R), CNMT