

Written Testimony Submitted by:
Jessica Shirkey
100 Woodmans Court
Essex, MD 21221
jshirkey@cCBCMD.edu
443-840-2017

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

Position: **Oppose**

Honorable Senators,

I am writing to strongly oppose SB0830, currently under consideration in the Maryland General Assembly. As a concerned radiologic technologist, educator, citizen, and resident of Maryland, I believe that this proposed legislation presents significant risks

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.
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.
3. **Increase shortages across advanced modalities:** Limited scope radiographers are not eligible to perform advanced imaging procedures, creating greater shortages in the advanced imaging departments of Computed Tomography, Magnetic Resonance Imaging, Mammography, Interventional Procedures, and Cardiac Catheterization. All of which are also suffering from staff shortages.
4. **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.

5. **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.

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,

Jessica Shirkey BSMI ARRT RT(R)(MR)