

# **SB 915 State Board of Physicians - Delegation of D**

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Position: FAV



Maryland  
Hospital Association

**Senate Bill 915- State Board of Physicians - Delegation of Duties - Alterations**

**Position: *Support***

March 3, 2026

Senate Finance Committee

**MHA Position**

On behalf of the Maryland Hospital Association's (MHA) member hospitals and health systems, we appreciate the opportunity to comment in support of Senate Bill 915.

This bill builds on legislation passed during the 2024 legislative session to allow students who complete the first year of an accredited radiologic technologist program to perform limited X-rays of the chest, extremities, and spine under supervision in physician offices and urgent care centers.

SB 915 would expand access to care in Maryland. In Q3 2025, Maryland hospitals reported a 11.4% vacancy rate for radiologic technologists (RT). These specially trained health care workers are critical in hospital environments, where they can perform specific radiologic procedures on high acuity patients. Currently, RTs are utilized in hospitals and outpatient settings. Given the shortage, this means there are outpatient settings, like urgent care centers, where there is no access to X-ray services. The previously passed legislation was meant to allow medical assistants to receive additional training to perform X-rays on low acuity patients. Expanding this statute to include radiologic technologist students who have completed their first year of school similarly allows an individual with training to perform limited scope X-rays.

SB 915 could also support students on their journey to become an RT. The training generally takes two years of full-time school. Offering a limited scope licensure exception could allow interested individuals to earn an income while gaining experience. This earn-while-you-learn model has proven effective and could help attract more RTs to Maryland hospitals and support them while they complete their training.

SB 915 offers an immediate solution that can quickly expand the RT workforce, while also strengthening the pipeline of future fully licensed RTs.

For these reasons, we ask for a *favorable* report on SB 915.

For more information, please contact:

Jane Krienke, Assistant Vice President, Government Affairs & Policy

[Jkrienke@mhaonline.org](mailto:Jkrienke@mhaonline.org)

**RadNet response SFC SB915 student RT\_FINAL.pdf**

Uploaded by: Michael Mabry

Position: FAV



Leading Radiology Forward  
10461 Mill Run Circle, Suite 1020  
Owings Mills, MD 21117

TO: The Honorable Pamela Beidle, Chair  
The Honorable Antonio Hayes, Vice Chair  
Members, Senate Finance Committee

FROM: Steve Forthuber, President Eastern Operations

DATE: February 27, 2026

RE: **Favorable:** Senate Bill (SB) 915 -- *State Board of Physicians – Delegation of Duties – Alterations*

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RadNet leads the nation in outpatient diagnostic imaging services with over 400 centers across the United States. We have a major presence in Maryland with our Eastern Headquarters being in Baltimore and having over 60 imaging centers throughout the state. RadNet employs nearly 1,000 Radiologic Technologists (RT) in total across all of our Maryland imaging centers.

SB 915 would create a pathway for students in radiologic technology programs who have completed successfully their first year of training to practice as limited x-ray machine operators (LXMO) under Md. Code, Health Occ. § 14-306. If passed, SB 915 would go into effect on October 1, 2026.

RadNet, like many other medical imaging providers, is affected negatively by the current serious lack of RTs in Maryland and across the nation. Moreover, we heard from stakeholders who need a ready supply of individuals who could perform a limited range of x-ray procedures. Patient access to care is decreased and care postponed by delays in scheduling exams and cancellations due to lack of RT availability. Healthcare costs increase from higher wages and more overtime. RadNet hosted a summit in September, 2024 in Maryland that was attended by over 100 RTs and industry thought-leaders to discuss and identify solutions to the RT supply problem. We learned that barriers to becoming an RT included: educational affordability, lack of entry-level roles and career progression, and limited opportunities to work in the field while pursuing their education.

SB 915 is part of the solution to the need for more RTs in Maryland. By allowing students in accredited radiologic technology programs to work as LXMOs while pursuing their RT degree, the workforce of qualified imaging professionals is expanded, thereby increasing patient access and timely patient care. Plus, the RT profession is made more attractive to those considering a career in healthcare.

We commend Senator Mautz for his leadership on this important healthcare workforce issue and recommend a “favorable” report by this committee.

RadNet appreciates the opportunity to provide this statement before Senate Finance Committee.

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Uploaded by: State of Maryland (MD)

Position: FAV



# Board of Physicians

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

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## 2026 SESSION POSITION PAPER

**BILL NO.:** SB 915 - State Board of Physicians - Delegation of Duties - Alterations  
**COMMITTEE:** Finance  
**POSITION:** Letter of Support

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The Maryland Board of Physicians (the Board) is respectfully submitting this Letter of Support for Senate Bill (SB) 915 - State Board of Physicians - Delegation of Duties - Alterations. SB 915 reorganizes Health Occupations, Section 14-306, Annotated Code of Maryland, authorizes students who have completed the first year of an accredited radiologic technology education program in good standing and who meet all other requirements to apply to register as a limited X-ray machine operator (LXMO) with the Board, and establishes disciplinary grounds for LXMO registrants and applicants.

Currently, the Board is constrained in its ability to take disciplinary action against LXMO registrants and applicants due to a lack of disciplinary grounds in the statute. This means that the Board cannot revoke a registration or register an individual with conditions that protect the public. In addition, since the implementation of the LXMO registration on January 1, 2025, the Board has found that 31% of applicants (4 out of 13) failed to disclose criminal events on their application. However, without disciplinary grounds, the Board is limited in its ability to respond to findings that would constitute grounds for denying an application. This is inconsistent with and contradicts the Board's mission to assure quality health care through effective discipline and creates significant public safety concerns, especially since LXMOs are intended to work outside hospitals and in less-regulated settings, such as urgent cares.

SB 915 effectively addresses the Board's concerns by establishing standard disciplinary grounds for LXMOs. The Board appreciates and supports this addition as a crucial component in fulfilling its mission. SB 915 introduces a pathway to allow more qualified individuals into the workforce while also improving public safety.

Thank you for your consideration. For more information, please contact Madeline DelGreco, Manager of Policy and Legislation, at 410-764-5053.

Sincerely,

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.**

**GR26\_MD\_SB915\_Letterhead.pdf**

Uploaded by: Meredith Check

Position: FWA



## American Society of Radiologic Technologists

Senator Pam Beidle  
Chair  
Senate Finance Committee  
3 East Miller Senate Office Building  
Annapolis, Maryland 21401  
[pamela.beidle@senate.maryland.gov](mailto:pamela.beidle@senate.maryland.gov)

February 27, 2026

Dear Chair Beidle,

The American Society of Radiologic Technologists represents more than 155,000 medical imaging and radiation therapy professionals across the nation, including 2,544 in Maryland. Our main mission as an organization is to advance and elevate the medical imaging and radiation therapy profession and enhance quality, safe patient care. With that mission in mind, ASRT is encouraged by the introduction of Senate Bill 915.

ASRT understands the need to address workforce shortages through utilization of limited x-ray machine operators; however, patient safety must take priority. By requiring limited x-ray machine operators to meet initial educational requirements, and pass a standardized competency exam under SB 915, Maryland is taking a critical step to ensure Marylanders receive safe, high-quality care from qualified medical imaging professionals. In order to align with the nationally-recognized curriculum, ASRT recommends increasing the minimum required didactic education to 150 hours.

Additionally, by limiting the procedures a limited x-ray machine operator can perform and requiring limited x-ray machine operators to pass a national competency exam, SB 915 appropriately balances workforce shortage and patient safety issues while ensuring patients receive high quality care.

ASRT appreciates your commitment to providing patients' access to quality health care services that only individuals who meet national education and clinical standards can provide and looks forward to working with you in the future to achieve this goal. Please feel free to contact me at [mcheck@asrt.org](mailto: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 stylized, with the first letter "M" being large and the last name "Check" written in a cursive-like script.

Meredith Check  
Director of Government Relations and Public Policy  
American Society of Radiologic Technologists