**MEMORANDUM IN OPPOSITION**

**A7753, Tapia**

***Establishment of Limited-Scope Radiographers in the Urgent Care Setting***

The New York State Radiological Society is opposed to A7753, Tapia, which would establish limited-scope radiographers in the urgent care setting. This legislation would authorize individuals licensed as limited-scope radiographers to practice radiography at urgent care centers under direct supervision of a licensed practitioner. The Society is primarily concerned that this legislation will compromise patient safety in urgent care settings by allowing individuals who lack sufficient training to position patients and apply radiation to obtain X-ray images.

Radiologic technologists, commonly referred to as RTs, are medical professionals specially trained to operate diagnostic imaging equipment. This includes using tools like X-rays, magnetic resonance imaging (MRI), and computed tomography (CT) scans. Their primary role is capturing clear and accurate images of the human body, aiding physicians in diagnosing ailments ranging from broken bones to complex diseases. RTs typically receive an associate or bachelor’s degree, which includes detailed curriculum focused on anatomy, physiology, medical terminology, radiation protection, and radiographic procedures. ALARA is an integral part of this curriculum.

ALARA, meaning As Low as Reasonably Achievable, is the guiding principle of radiation safety. ALARA is based on the idea that any amount of radiation exposure, big or small, can increase negative health effects for an individual, including cancer. ALARA dictates that every effort should be made to reduce the patient’s exposure to radiation. Numerous regulatory agencies recognize and require adherence to ALARA as the fundamental standard of radiation safety.

RTs receive specialized training that prepares them for the responsibilities of their role and provides them with the knowledge and skill necessary to minimize the radiation dose to the patient. In other states where they are authorized, limited scope radiographers need only a high school diploma or equivalent. Limited radiographer training programs can be as little as 6 weeks conducted entirely online. Given the significant risks of radiation exposure, the minimal training of limited scope radiographers presents significant patient safety concerns.

The sponsor’s memo for this bill states “an unbelievable amount of [RTs have] left the medical field due to profound pandemic-related shifts in the health-care workforce, with the remaining individuals preferring to work in hospitals with highly competitive salaries.” Current data does not indicate a seismic shift of RTs leaving the medical field. The U.S. Bureau of Labor Statistics’ latest data from 2022 shows that New York ranks #4 in the nation for having the highest employment level of RTs.

It is accurate that many RTs choose to seek employment in hospitals. Data from the American Association of Radiologic Technologists (AART) shows higher employment of RTs in settings that provide market rate compensation and opportunities for career advancement. The average annual salary for a NY-based RT is approximately $80,000. AART data shows that nationally, clinic-based RTs earn 20% less than hospital-based RTs. Sacrificing patient safety to allow hiring of lesser trained and less expensive individuals to protect the financial bottom line of urgent care clinics is unreasonable and irresponsible.

The New York State Radiological Society is concerned that this legislation would weaken patient safety standards with regard to radiation exposure. For this reason, we are opposed to A7753, Tapia and urge its defeat.