

Department of Legislative Services
Maryland General Assembly
2026 Session

FISCAL AND POLICY NOTE
Third Reader - Revised

Senate Bill 915
Finance

(Senator Mautz)

Health

State Board of Physicians - Delegation of Duties - Alterations

This bill requires an individual to be registered as a limited X-ray machine operator with the Maryland Board of Physicians (MBP) to perform certain X-ray machine operations that previously could be performed without a license, and places conditions on the performance of X-ray duties by a physician assistant (PA). An individual seeking registration or renewal must apply, pay the registration/renewal fee, and complete any other requirements established by MBP. An applicant must also complete a criminal history records check. MBP may set reasonable registration and renewal fees, set to approximate the cost of maintaining the registration program. If an individual was denied a license by MBP, the individual is not eligible for registration. The term of a registration may not exceed three years. The bill outlines penalty provisions for violations. The bill also recodifies provisions related to delegation of duties by a physician to a registered cardiovascular invasive specialist (CIS) or a supervised medical graduate.

Fiscal Summary

State Effect: MBP can handle any registration applications using existing budgeted resources and staff. Penalties and registration fees are not expected to materially impact State revenues.

Local Effect: None.

Small Business Effect: Minimal.

Analysis

Bill Summary:

Limited X-ray Machine Operator Registration

Under the bill, certain duties that could previously be performed without a license instead require an individual to be registered as a limited X-ray machine operator with MBP.

The duties must be performed under the supervision of a licensed physician or radiographer who is on-site and able to provide immediately available direction, and must be performed by an individual who has registered with MBP and attests to successfully completing:

- at least six months of clinical care experience;
- a limited X-ray education program, or the first year of an accredited radiologic technologist program in good standing with MBP;
- at least 150 hours of didactic training delivered by a radiologic technologist certified by the American Registry of Radiologic Technologists (AART), providing instruction in radiographic anatomy, procedures, pathology, digital image acquisition and display, fundamentals, ethics, and laws of health care, human anatomy and physiology, image production and analysis, imaging equipment and radiation production, medical terminology, and patient care;
- at least 480 hours of clinical training; and
- at least five competencies in each specified body part under the direct supervision of a radiologic technologist certified by ARRT.

The individual must also have successfully achieved a passing score, as determined by MBP, on the AART examination for limited scope of practice in radiography or an alternative examination approved by MBP.

If the applicant completed the first year of an accredited radiologic technologist educational program, the program director must provide an attestation directly to MBP stating the applicant meets or exceeds these requirements.

Once registered, an individual must complete at least 24 hours of approved continuing education credits during the two years immediately preceding the expiration of a registration.

Physician Assistants

A PA may perform X-ray duties in the medical office of a patient care team physician if (1) the PA has completed a course that includes radiographic studies of the extremities of at least 20 separate patients; (2) the X-rays are limited to the extremities; (3) the X-rays are performed under the direct supervision of a collaborating physician or radiologist; (4) the X-rays are performed using a mini C-arm or similar low-level radiation machine to perform nonfluoroscopic X-ray procedures; and (5) the PA obtains MBP approval of the X-ray duty as an advanced duty under the collaboration agreement.

The bill also repeals a provision allowing the delegation of limited X-ray duties (nonfluoroscopic procedures of the extremities, anterior-posterior, and lateral, not including the head) to a PA under a collaboration agreement.

Penalty Provisions

Under MBP, a disciplinary panel may issue a cease-and-desist order or obtain injunctive relief against an individual for representing to the public by title, description of services, methods, procedures, or otherwise that an individual is authorized to practice limited X-ray machine operation.

In accordance with MBP regulations, a physician's office that employs an individual authorized to perform X-ray duties without a license is responsible for ensuring that all requirements of the bill are met for each X-ray performed. If an unregistered individual performs X-ray duties without meeting the requirements of the bill, MBP may impose a civil penalty of up to \$5,000 for each violation on the physician's office where the violation occurred, and \$1,000 for each violation on the individual who committed the violation.

Subject to current hearing provisions, a disciplinary panel may deny a registration to any applicant, reprimand any registrant, place any registrant on probation, or suspend or revoke a registration on the affirmative vote of a majority of the quorum of a disciplinary panel, if the applicant or registrant violates any one of 28 disciplinary grounds.

Except as otherwise provided under the Administrative Procedure Act, before MBP or a disciplinary panel takes any disciplinary action, it must give the individual against whom action is contemplated an opportunity for a hearing before MBP or the disciplinary panel.

If, after a hearing, a disciplinary panel finds there are grounds to reprimand any registrant, place any registrant on probation, or suspend or revoke a registration, the panel may impose a fine subject to MBP's regulations in addition to reprimanding the registrant, placing the registrant on probation, or suspending or revoking a registration. In addition to any

sanction, a disciplinary panel may require a registrant to comply with specified terms and conditions. MBP must pay any fines collected into the State general fund.

On the filing of certified docket entries with MBP by the Office of the Attorney General (OAG), a disciplinary panel must order the suspension of a registration if the registrant is convicted of or pleads guilty or *nolo contendere* with respect to a crime involving moral turpitude, whether or not any appeal or other proceeding is pending to have the conviction/plea set aside. After completion of the appellate process, if the conviction has not been reversed or the plea has not been set aside, a disciplinary panel must order the revocation of a registration on the certification by OAG.

Current Law:

X-ray Duties Without Licensure

Chapters 871 and 872 of 2024 altered the circumstances under which an individual may perform X-ray duties without a license. A physician's office that employs an unlicensed individual to perform X-ray duties is responsible for ensuring that all requirements are met for each X-ray examination performed.

These X-ray duties must be performed (1) in the physician's office under the supervision of a licensed physician or radiologic technologist who is on site or able to provide immediately available direction and (2) by an individual who meets specified requirements.

An individual may perform X-ray procedures limited to (1) the chest; (2) the spine, including the cervical spine, lumbar spine, sacroiliac joints, sacrum and coccyx, and thoracic spine; (3) the lower extremities, including toes, the foot, the ankle, the calcaneus, the tibia and fibula, the knee and patella, and the femur; and (4) the upper extremities, including fingers, the hand, the wrist, the forearm, the elbow, the humerus, the shoulder, the clavicle, acromioclavicular joint, and the scapula.

A PA may perform the listed X-ray duties in the medical office of a patient care team physician if (1) the PA has completed a course that includes anterior-posterior and lateral radiographic studies of extremities on at least 20 separate patients under the direct supervision of the delegating physician or radiologist using a mini C-arm or similar low-level radiation machine to perform nonfluoroscopic X-ray procedures; (2) the PA obtains MBP approval of the X-ray duty under the collaboration agreement; and (3) the duties are performed pursuant to a Board-approved delegation agreement that includes a request to perform advanced duties. A collaboration agreement may authorize the delegation of limited X-ray duties (nonfluoroscopic X-ray procedures of the extremities, anterior-posterior and lateral, not including the head).

Specifically, if not licensed as a PA, to perform X-ray duties without a license, an individual must:

- attest to the completion of at least six months of clinical care experience;
- complete a limited scope X-ray educational program consisting of at least 115 hours of didactic training delivered by a radiologic technologist certified by ARRT providing instruction, as specified;
- complete at least 480 hours of clinical training and a minimum of five competencies in each body part specified under the direct supervision of a radiologic technologist certified by ARRT;
- achieve a passing score (as determined by MBP) on the ARRT examination for limited scope of practice in radiography or an alternative examination approved by MBP; and
- register with MBP attesting to completion of each of the above requirements and the completion of at least 24 hours of approved continuing education credits earned during the two-year period immediately following the date of initial registration and every two years thereafter.

If an unlicensed individual performs X-ray duties without meeting the bill's requirements, MBP may impose a civil penalty of up to \$5,000 for each violation of the physician's office where the violation occurred and up to \$1,000 for each violation of the individual who committed the violation.

By October 1, 2029, MBP must report to specified committees of the General Assembly on the number of individuals who have registered to perform limited X-ray duties and its recommendations regarding continuing the registration process or replacing the registration process with a limited licensure category.

Supervised Medical Graduates

Chapter 286 of 2024 authorized a supervised medical graduate to perform delegated duties in accordance with regulations adopted by MBP under "direct supervision" (oversight exercised by a delegating physician who is (1) personally treating the patient; (2) in the same medical office as the patient and the specified graduate; and (3) immediately available to provide assistance and guidance – but not required to be in the presence of the patient and specified graduate – while a delegated duty is being completed). An individual may not practice as a supervised medical graduate for more than two years.

Cardiovascular Invasive Specialists

Chapter 445 of 2019 authorized a licensed physician to delegate duties to a registered CIS assisting in a fluoroscopy under specified conditions. “Registered cardiovascular invasive specialist” means an individual who is credentialed by Cardiovascular Credentialing International or another credentialing body approved by MBP to assist in cardiac catheterization procedures under the direct, in-person supervision of a licensed physician. A CIS may assist a physician in the physician’s performance of a fluoroscopy if (1) the delegated duties are limited to a cardiac catheterization procedure performed in a hospital cardiac catheterization laboratory; (2) the physician is physically present and personally directs each act performed by the registered CIS; (3) the registered CIS has completed the training and education and has the experience required by MBP regulations; and (4) the hospital in which the cardiac catheterization laboratory is located has verified and documented that the registered CIS has completed the specified training and education and has the required experience required by MBP regulations.

It is the responsibility of the hospital, and the physician who is supervising the procedure, to ensure that specified requirements are met for each procedure. MBP may impose a civil penalty of up to \$5,000 for each instance of a hospital’s failure to comply with the specified requirements.

Additional Information

Recent Prior Introductions: Similar legislation has not been introduced within the last three years.

Designated Cross File: HB 1047 (Delegate Hutchinson) - Health.

Information Source(s): Maryland Department of Health; Department of Legislative Services

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