



NMTCB

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The Nuclear Medicine Technology Certification Board

Freddie Rodriguez
California State Assembly
State Capitol- Room 2188
PO Box 942849
Sacramento, CA 94249

RE: Comments Regarding California AB1273

June 2, 2021

Dear Mr. Rodriguez,

The Nuclear Medicine Technology Certification Board (NMTCB) respectfully submits this letter to the California State Assembly in opposition of the legislative efforts to pass California AB1273, specifically the Earn and Learn Concept.

To explain, NMTCB was formed for the purpose of creating and maintaining examinations for nuclear medicine technologists (NMTs). NMTCB's Certified Nuclear Medicine Technologist (CNMT) credential is accredited by the National Commission of Certifying Agencies (NCCA), which demonstrates that this certification meet the national standards and maintain the essential elements of a high-quality certification program. NMTCB currently credentials over 23,000 nuclear medicine technologists worldwide. At present, there are 1,391 individuals in the State of California who hold a nuclear medicine credential from NMTCB.

In order for an individual to be considered eligible to sit for NMTCB's nuclear medicine technology certification exam, an applicant must complete an accredited nuclear medicine technology program culminating in a Certificate, Associate, Baccalaureate, or Master's degree. Accreditation is a voluntary process which may be undertaken by schools to demonstrate their dedication to the highest standards of the nuclear medicine profession. The organization responsible for the accreditation of nuclear medicine technology educational programs is the Joint Review Committee on Educational Programs in Nuclear Medicine Technology (JRCNMT), whose standards and policies prohibit students from being paid or working in the role of a technologist while enrolled in an educational program.

Obtaining clinical experience is a necessary and integral factor for students to obtain clinical competency. Educational programs must have structured clinical training sufficient to provide clinical competency in radiation safety, instrumentation, clinical procedures, and radiopharmacy. If a student is paid during their clinical rotation, that person may be treated like an employee and not as a student – which means they may not be provided adequate supervision. Supervision is critical for quality education, assessment of competence and, most important of all, for patient safety.

It is unclear within AB1273 whether the educational programs or the medical facilities would be responsible for the expense of student's wages. This would be a large financial burden for either entity. Passage of this bill could potentially force the closure of nuclear medicine technology programs that are unable to provide compensation for their students in the clinical setting, resulting in an even larger shortage of technologists available to work in the State of California.

Therefore, NMTCB does not support AB1273 due to the negative impact such legislation will likely have upon nuclear medicine technology educational programs. NMTCB respectfully requests that you reconsider moving forward with this legislation as the impact of this bill would be far reaching.

Please feel free to contact me with any questions regarding this communication.

Sincerely,

A handwritten signature in blue ink that reads "Katie Neal". The signature is written in a cursive, flowing style.

Katie Neal, BS, MS
NMTCB Executive Director
board@nmtcb.org