

June 7, 2021

The Honorable Freddie Rodriguez
State Capitol (Room 2188)
P.O. Box 942849
Sacramento, CA 94249

Dear Assemblyman Rodriguez:

On behalf of the Society of Nuclear Medicine and Molecular Imaging (SNMMI), I am writing to you today to express our opposition of AB 1273. For more than 50 years, SNMMI has successfully followed a mission of educating professionals, policy makers, and the general public about the nuclear medicine and molecular imaging. With over 17,000 members worldwide, SNMMI represents nuclear medicine and molecular imaging professionals, including physicians, physicists, pharmacists, and technologists, all of whom are committed to the advancement of the field. Additionally, the SNMMI-Technologist Section (SNMMI-TS) advocates for best practices in evidence-based science that promote the highest quality in patient care and safety by supporting standards for education and training for NMTs as defined by the Joint Review Committee on Educational Programs in Nuclear Medicine (JRCNMT).

With new technology and medical imaging equipment, it is important for medical professionals to have a comprehensive knowledge and understanding of radiation biology. The misuse, overuse, and/or inappropriate handling of radiologic technology can be detrimental to both, the patient and to the nuclear medicine technologist (NMT). Improper use of equipment can result in faulty images which, in turn, can lead to a misdiagnosis or false interpretation of patient conditions. In order to prepare knowledgeable, competent, and qualified professionals, the educational content and course competencies are expanding and increasingly complex. In addition, one must graduate from an accredited Nuclear Medicine program in order to sit for the national certification from the Nuclear Medicine Technologist Certification Board (NMTCB).

Most accredited programs are at the baccalaureate level, and some are converting to a master's level due to the complexity of the field and the volume of material that must be taught in order to perform nuclear medicine technology. Educational programs require extensive didactic education in the fundamentals of nuclear medicine, radiation biology, radiopharmaceuticals, and radiation physics. Additionally, clinical competency requirements must be successfully completed under the direct supervision of a qualified NMT. It would be extremely challenging to meet all of these educational requirements via an apprenticeship model. As a point of reference, Arizona recently passed a law that would allow some junior college programs to offer baccalaureate degrees due to the academic rigor and the number of required hours that a student must take (120 hours). Nuclear

Medicine Technology was one such program, and as such students that graduate from a Nuclear Medicine associate's program in Arizona are now awarded a baccalaureate degree.

Of serious concern, AB 1273 prohibits state agencies, specifically, the California Department of Public Health-Radiologic Health Branch (CDPH-RHB) from approving accrediting agencies that do not allow wages to be paid, and does not appear to limit the type of paid work that a student can perform. This is a significant problem as the JRCNMT prohibits students from earning wages for clinical hours performing duties as a nuclear medicine technologist while in training. This injunction prevents unqualified individuals from being employed as NMTs during training, deterring them from administering radioactive substances, adjunctive medications (when applicable) and monitoring the physiological/metabolic responses to such agents, without appropriate supervision.

California has only three accredited nuclear medicine programs, which will presumably close if AB 1273 is accepted into law, as the JRCNMT does not allow students to be paid for services as a nuclear medicine technologist while enrolled in an NMT educational program. California nuclear medicine students would no longer be able to take the NMTCB national certification board and could not be hired in any other state to practice nuclear medicine technology.

To alleviate the impending shortage of healthcare workers, the Society suggests that California develop a grant program to offset the costs that are associated with obtaining an education in an allied health career. This would encourage those who may otherwise be limited by financial barriers to pursue these allied health professions. The state's health care learning grant would offset the educational costs, encouraging interest and enrollments into health care programs. Additionally, many professional societies like the SNMMI offer scholarships and grants for students enrolled in educational programs to help lessen some of the financial burden associated with education.

We respectfully request that you reconsider your support of AB 1273 and not support its enactment.

Respectfully,

A handwritten signature in black ink, appearing to read "Tina Buehner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tina M. Buehner, PhD, CNMT, FSNMMI-TS
President SNMMI-TS