



## SOCIETY OF DIAGNOSTIC MEDICAL SONOGRAPHY

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March 22, 2017

The Honorable Tony Thurmond  
Chair, Assembly Labor and Employment Committee  
P.O. Box 942849  
Sacramento, CA 95814-0015

*Delivered via email*

**RE: OPPOSITION TO ASSEMBLY BILL 387**

Dear Assembly Member Thurmond:

I am writing on behalf of the California members of the Society of Diagnostic Medical Sonography (SDMS) to express strong opposition to Assembly Bill (AB) 387. The bill would require healthcare employers to pay allied health students minimum wage during any clinical training that is required for licensure, registration, or certification. Although AB 387 may be well-intentioned, its passage will significantly harm students, patients, educational programs, and ultimately lead to shortages of allied health professionals.

Many allied health professions require students to participate in clinical or experiential training at a medical facility (e.g., hospital, clinic, diagnostic lab, physician's office, etc.) to obtain a degree or qualify for licensure, certification, or registration. Medical facilities are critical partners in the education and training of allied health professionals as they are uniquely poised to provide the needed clinical experience. Educational programs accredited by the Commission on Accreditation of Allied Health Education Programs (CAAHEP – [caahep.org](http://caahep.org)) must be non-discriminatory and in compliance with federal and state statutes, rules, and regulations for all activities associated with the program, including clinical experience, student and faculty recruitment, student admission, and faculty employment practices.

Sonography students who are completing the required "supervised work experience" (i.e., clinical experience) are not qualified to work unsupervised, but rather are learning hands-on skills and techniques under the guidance of experienced sonographers. Opportunities for students to learn many of the required clinical skills (e.g., abnormal pathology, image acquisition and optimization, patient and healthcare provider interactions, etc.) are essential to the educational process and simply cannot be replaced by didactic courses.

It appears the premise of AB 387 is that medical facilities are using students completing clinical experience to fill positions so that the facility does not have to pay certified and registered personnel. However, the reality is that medical facilities who voluntarily accept students could lose much more money than they would ever save. For example, when a student sonographer is present, the amount of time required to complete a sonographic examination is increased because of the training and mentoring provided by the facility's sonographers and physicians to the student sonographer. As a result, the facility may be unable to schedule and perform as many procedures, which could decrease their revenue.

In addition, sonographers serving as clinical instructors at the medical facility have a significantly increased administrative burden as they document, evaluate, and provide feedback to the educational program regarding the student's performance. Certainly, as students become more experienced, the time required for direct supervision may decrease, but the student is still not qualified to work unsupervised and will require time to discuss cases, unusual findings, techniques, etc. The amount of time required to provide clinical experience is the most common reason cited by medical facilities who choose not to allow students in their facility.

If the facility receives a benefit from hosting students during their clinical time in the facility, it is in knowing that they are helping to support the educational and healthcare systems. In some cases, the facility may also identify sonography students who might be good future employees (once they are certified and registered sonographers). AB 387 will simply take away these benefits by eliminating clinical experience opportunities in many facilities. Legislation that encourages, rather than discourages, medical facilities to provide clinical experience opportunities to allied health students is needed.

According to the U.S. Department of Labor, employment of sonographers is projected to grow 24 percent from 2014 to 2024, much faster than the average for all occupations. A 2015 study conducted by the SDMS, showed that the median salary for sonographers in California was \$46.25/hr (\$96,200/yr). As imaging technology evolves, medical facilities will continue to use ultrasound to replace more invasive, costly procedures and the clinical experience opportunities for sonography students in healthcare facilities must be available to meet the state's growing needs.

Again, **the SDMS strongly opposes AB 387 and respectfully asks that you vote "NO" on AB 387.** Thank you for helping to protect the patients that sonographers serve in California. The SDMS is available to provide any assistance needed as this bill is considered by the California State Assembly. Please feel free to contact me at 800-229-9506 x184 or [dkerns@sdms.org](mailto:dkerns@sdms.org).

Sincerely,



Donald E. Kerns, JD, CAE  
Chief Executive Officer/Executive Director

Cc: Assembly Labor & Employment Committee Members and Staff

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#### **About the SDMS**

The Society of Diagnostic Medical Sonography ([sdms.org](http://sdms.org)) is a professional membership organization founded in 1970 to promote, advance, and educate its members and the medical community in the science of diagnostic medical sonography. With over 28,400 members, the SDMS is the largest association of sonographers and sonography students in the world.

#### **About Diagnostic Medical Sonography**

Diagnostic medical sonographers use special imaging equipment that directs sound waves into a patient's body to assess and diagnose various medical conditions. For more information, visit the SDMS Career Center at [sdms.org/resources/careers](http://sdms.org/resources/careers) and the U.S. Department of Labor, Bureau of Labor Statistics at [bls.gov/ooh/Healthcare/Diagnostic-medical-sonographers.htm](http://bls.gov/ooh/Healthcare/Diagnostic-medical-sonographers.htm).