March 26, 2025

William Anderson

Office of General Counsel

Department of Public Health

250 Washington Street

Boston, MA 02108

**RE: ARRT Supports Proposed Massachusetts Rulemaking Creating ‘Limited Scope of Practice in Radiography’ provided an Exam and Passing Score Requirement is Incorporated**

Dear Mr. Anderson Esq.,

The American Registry of Radiologic Technologists (“ARRT”) is a national, voluntary certification organization that develops and administers standards to assess the qualifications of individuals in medical imaging and radiation therapy. It was founded in 1922 and is incorporated as a not-for-profit under the Internal Revenue Code Section 501(C)(6). ARRT currently certifies and registers more than 350,000 individuals nationwide as Registered Technologists in 15 disciplines, including Radiologic Technology and Radiation Therapy. ARRT also administers examinations for Limited Scope of Practice in Radiography in individual states.

ARRT is pleased to have the opportunity to review regulations which proposes language updates that support the creation of a Limited Scope of Practice in Radiography, as referenced as new language in 105 CMR 125.003 definitions, also known as Limited X-ray Machine Operators (“LXMO”), as is consistent with our industry standard. We are generally supportive of this change provided clarifying language can be added requiring the addition of successfully passing an examination approved by the Department. ARRT suggests the addition of the following.

**ARRT Proposed Addition to the New Language in 105 CMR 125.005- ‘Qualifications and Application for Radiologic Technologist License’:**

(B) **An applicant for a Limited Scope of Practice in Radiography may apply to practice in up to two of the following procedure specialties: chest, extremities, skull/sinuses, spine, or podiatric radiography, by submitting appropriate course of study in these procedure specialties to the Department and by achieving a passing score set by the Commonwealth of Massachusetts on the Limited Scope of Practice in Radiography Examination administered by ARRT or other national or international certifying board approved by the Department.**

**ARRT Proposed Clarification to 105 CMR 125.002-.004- ‘General Provisions’ and ‘Scope of Practice':**

There is not a national certifying agency for LXMO at this time, there is only state licensure in the states that have chosen to do so (125.002). Therefore, in ‘Scope of Practice’ as part of the licensure in name being issued could lead to confusion when there is scope of practice standards outside of licensure (125.004).

ARRT supports that any healthcare professional who performs medical imaging procedures, including Limited Scope of Practice of Radiography, should be educationally prepared and clinically competent to ensure that patients are receiving safe, high-quality medical imaging that minimizes dose to ionizing radiation. ARRT is in support of the proposed regulation that recognizes those who perform Limited Scope of Practice in Radiography procedures in your state. However, updating the language to include an examination requirement and a passing score is an important step in supporting healthcare professionals who have completed appropriate training and assessment of knowledge to perform Limited X-ray Machine Operators clinical procedures.  Finally, clarification in both ‘General Provisions’ and ‘Scope of Practice’ to promote transparency and accuracy, as previously mentioned, is also recommended.

We thank you for your support and look forward to a positive outcome. Please do not hesitate to contact me at (651) 687-0048, ext. 3121, if I can provide further information.

Sincerely,

A close-up of a signature

AI-generated content may be incorrect.

Liana Watson, DM, R.T.(R)(M)(S)(BS)(ARRT), RDMS, RVT, FASRT, CAE

CEO