Re: Licensing of Radiologic Technologists

From: Andrew Najjar, Massachusetts Health Physics Consultant, 65-0907

To: William Anderson, Office of the General Counsel, Department of Public Health

Mr. Anderson,

I am writing to you regarding the oral testimony given at the public hearing held on March 26, 2025 at 10:00 a.m. regarding the proposed amendments to 105 CMR 125.000 *Licensing of Radiologic Technologists*.

As a health physics consultant registered with the Commonwealth of Massachusetts and a health physicist certified by the American Board of Health Physics, I would like to express my concern regarding the proposed amendments to 105 CMR 125.000, specifically with the lack of input from relevant subject matter experts.

My concern relates to the lack of a collaborative approach forming these proposed amendments. Massachusetts General Law Part I Title XVI Chapter 111 Section 5L calls for an Advisory Commission for Radiologic Technologists to meet on a quarterly basis (or more frequently). Additionally, Massachusetts General Law Part I Title XVI Chapter 111 Section 4F calls for an Advisory Council on Radiation Protection to meet at least twice a year. My concern regarding these proposed amendments would be greatly alleviated had these advisory councils been active, considered the proposed amendments, and endorsed said amendments. Bypassing these requirements seems unethical and does not set the Commonwealth up for success in achieving excellence in patient care. There will be future proposed amendments to these and other related regulations and it is imperative that these councils are active and functioning so as to serve their purpose in advising the Commissioner of the Department of Public Health and the Governor of Massachusetts respectively.

It is my recommendation that both of these advisory councils, consisting of relevant subject matter experts, are called to order to review the proposed amendments before moving forward with implementation. Had these councils endorsed these proposed amendments, my concern would be addressed.

Thank you for your consideration.

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Health Physics Consultant