Andrew Parnanen R.T. (R)(CT) ARRT

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Dear Members of the Massachusetts Department of Public Health, my name is Andrew Parnanen, and I am an Xray/CT technologist at Heywood and Lowell General hospitals. I am submitting this written testimony in relation to the public hearing on proposed amendments to 105 CMR 125.000 Licensing of Radiologic Technologists, scheduled for March 26, 2025. I appreciate the opportunity to provide my perspective on this important issue.

I stand in opposition to the proposed amendments listed above. As a father of 3, I would want any imaging and patient care on my family members and loved ones to be provided by professionals held to the same standards that have been in place for 30 years.

It's difficult to understand the DPH's efforts to credential individuals with less education, to perform imaging exams using carcinogenic ionizing radiation and provide patient care, when these credentialing efforts are viewed from the perspective of patient safety.

I would ask members of this committee if they would prefer to see themselves or their family members cared for by a Limited Scope Radiographer, or by a Radiographer who has satisfied the time, effort, and educational requirements that are currently in place.

The apparent staffing shortage in Massachusetts, in our industry, could be remedied by closer communication between \*all\* employers in need of radiologic technologists, and the post secondary institutions responsible for educating future imaging professionals.

As the creation of urgent care clinics, and different public health emergencies, have placed demands on the talent pool from the same source of radiographers, the placement of radiologic technologist students in all possible employment venues could be encouraged to help increase the number of imaging professionals graduating from established schools. Locally, there are no imaging students on clinical rotation in urgent care clinics, while these clinics are drawing from imaging talent that was educated clinically in a hospital setting.

The expansion of current post secondary educational institutions to remedy the radiologic technologist shortage would preserve the quality of patient care for all residents of the commonwealth. Please adopt policies preserving the educational integrity of radiologic technologists and improving the quality of patient care provided to all Massachusetts residents, rather than progressing these proposed RT licensing regulations. Thank you.

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