March 24, 2025

William Anderson

Office of the General Counsel

Department of Public Health

250 Washington Street

Boston, MA 02108

**RE:** **105 CMR 125.000: Licensing of Radiologic Technologists**

Dear Mr. Anderson:

My name is Ashley Clark, and I am a licensed Limited X-ray Machine Operator (LXMO) with ConvenientMD in New Hampshire. Please accept this letter as written testimony to express my SUPPORT of the proposed amendments to 105 CMR 125.000 adding a new Limited Scope of Practice in Radiography discipline for a licensed RT. The creation of this new license discipline will create new career pathways into our profession, address workforce demands, enhance access to community-based providers, improve patient care, and reduce strain on emergency departments.

As an LXMO, I am acutely aware of the staffing challenges faced by healthcare providers in the Commonwealth. The shortage of RTs is severely aﬀecting smaller and more independent practices. They are quickly running out of solutions to address staffing challenges beyond curtailing or eliminating radiology services and redirecting patients to other sites. These obstacles result in an additional financial burden onto the entire healthcare system–potentially forcing a compromise of patient care.

Limited Scope Licensure presents a solution to this problem that preserves patient safety and care quality, improves patient compliance and outcomes, keeps overall healthcare costs low, and ensures RTs like me can utilize our full scope of expertise in the areas where it is most needed. It will ease the burden on the RT labor pool and free up more RTs to work in higher-acuity sites of care. This licensing expansion also creates new career pathways for healthcare workers that reduces barriers to entry into our profession.

I thank the Department for taking the initiative to address this critical issue and urge favorable passage of the proposed amendments. Thank you for your consideration.

Sincerely,

Ashley Clark

ConvenientMD