3/17/2025

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 Celina Frost RT(R), and I am here today to speak in **SUPPORT** of adding the Limited X-ray Machine Operator licensure pathway to the state of Massachusetts. As a Director of Radiology, and Program Director of two successful LXMO programs in both New Hampshire and Massachusetts, I have witnessed first-hand that implementing this licensure pathway will have a significant positive impact on the community.

Limited X-ray Machine Operators play a crucial role in the delivery of quality diagnostic imaging, in urgent care clinics, and a variety of other healthcare facilities. These professionals are highly trained to perform specific diagnostic imaging procedures safely and effectively. The addition of this licensure pathway will help support the current workforce by providing clear pathways for career advancement and ensuring that communities have access to skilled professionals who can meet their healthcare needs.

One point I want to emphasize is the importance of avoiding overly restrictive regulations in the licensing process. While ensuring safety and competence is paramount, overly stringent regulations could create barriers to entry for individuals interested in pursuing a career in radiology, ultimately limiting the available workforce. We need to develop a licensure framework that allows for growth and opportunity, encouraging the next generation of healthcare professionals to enter and thrive in this vital field.

Tighter regulations that require additional unnecessary certifications, higher educational requirements, or extensive training hours may have unintended consequences, including making the process more expensive and time-consuming for prospective workers. This could hinder workforce development, especially in underserved areas of the state where healthcare access is already a challenge. By setting reasonable standards and offering clear pathways to licensure, we can ensure that we are not only providing safe care to our patients but also fostering an inclusive environment for aspiring professionals.

In conclusion, I urge the Department of Public Health to move forward with the establishment of the Limited X-ray Machine Operator licensure in Massachusetts, while keeping the regulatory

framework accessible and conducive to workforce growth. By doing so, we can ensure that our state has a well-trained and capable workforce that can meet the growing demands of our healthcare system.

Thank you for your time and consideration. Sincerely,

Celina Frost RT(R)

Director of Compliance and Radiology