March 24, 2025

To: Massachusetts Department of Public Health

Re: Written Testimony for Limited Scope Practice in Radiography, Date of Hearing 3/26/25

Dear Members of the Massachusetts Department of Public Health,

My name is Debra A. Desmarais, MBA, CRA, RT(R)(M), and I am the Executive Director for Radiology Imaging Services at Southcoast Health. I am writing this letter in regard to the current recommended changes to the MA Licensure requirements for Radiologic Technologists on the proposed amendments to 105 CMR 125.0000 Licensing of Radiologic Technologists. I sincerely appreciate the opportunity to provide my perspective and insight on this important patient care issue.

As the Executive Director for Imaging Services at Southcoast Health, I am also a registered Radiologic Technologist in radiography and mammography, past president of the MSRT and I have over 50 years’ experience in the field of radiology. I am opposed to the development of limited licensure in the commonwealth.

Developing a limited scope practice inclusive of limited education and training will not be sufficient to prepare an individual to acquire the knowledge and skills necessary to apply appropriate radiation safety principles, acquire quality images along with the skills necessary to adjust technical factors to improve image acquisition and develop a solid understanding of the principles and effects of radiation dose, all which impact one’s ability to produce quality radiographs to aid in the diagnosis and treatment of patients.

The scope of practice of a radiographer includes assessment skills to correlate the patient’s condition with the requested imaging procedure/exam, analytical ability to determine the appropriate technical factors based on the anatomy to be demonstrated along with the patient’s habitus and condition, a minimum of two years of academic training, the ability to evaluate the quality of an acquired image along with the knowledge needed to make any modifications to improve image quality and the ability to implement changes to image acquisition to ensure a quality exam.

I do not believe that a limited scope radiography license will afford a candidate the needed knowledge and experience required to produce diagnostic images at the appropriate radiation dose to keep the patient safe. Acquiring the skills necessary to produce quality radiographs is not something that can be learned in a condensed training program and will put the public at risk for increased radiation dose due to an inadequate foundation of the principles of radiation exposure and its effects on patient care.

In my position as the Executive Director of a multi-hospital system, I see no place for a limited scope individual in the hospital setting, in an orthopedic office or in an urgent care facility.

I appreciate the opportunity to share my thoughts and position on this key piece of legislation that is being evaluated in the commonwealth and the potential negative impact that it can have on the practice of radiography in the state of Massachusetts.

In conclusion, I strongly oppose this change to the licensure of Radiologic Technologists and urge the Department to NOT adopt these changes to the current licensure requirements due to the negating impact this will have on patient care and safety.

Thank you for your time and consideration of the important patient safety issue.

Respectfully,

Debra A. Desmarais, MBA, RT(R)(M), ARRT

Debra A. Desmarais, MBA, CRA, RT(R)(M), ARRT

Executive Director, Radiology Imaging Services

Southcoast Health

And

Past President, MSRT