**3/25/2025**

**Emma LeBel**

**3 Pamela Circle, Stoneham MA 02180**

**emmalebel99@yahoo.com**

**To: Massachusetts Department of Public Health**

**Subject:** Opposition to the Limited Scope Radiography Licensure (105 CMR 125.00) – March 26, 2025

Dear Members of the Massachusetts Department of Public Health,

My name is Emma LeBel, and I am a graduating Radiologic Technology student from North Shore Community College. I am submitting this written testimony in opposition to the implementation of proposed amendments to 105 CMR 125.000 Licensing of Radiologic Technologists scheduled for March 26, 2025.

I truly believe that these changes would have a detrimental impact on the radiography world. To start, as a current student there is more that goes into taking an x-ray than just pressing a button and seeing someone's anatomy. There are serious dangers to taking x-rays with little schooling. There are very sensitive anatomies that can be affected by insufficient practice causing genetic issues, skin issues and other physical harm. These limited positions will not help the efficiency of a patient's visit. These limited technologists are able to do only two practices versus the full body a normal tech can do. What would happen if a patient came in with an issue that isn’t on the list of things that are in the limited techs scope of practice? I believe the two or more years of schooling to obtain a normal license in radiologic technology is more than enough to provide adequate training for safety purposes and with such a quick schooling process the amount of techs in the trade will only grow and have full capabilities and hold more value than that of a limited tech. There is no price you can put on the safety of patients and their quality of care, regardless if a limited tech saves employers a few dollars is it worth the possibility of issues arising in the future that can be prevented with the full scale technologist.

Massachusetts is known for its high standards in patient care. Lowering qualifications for individuals performing X-ray exams risks compromising the safety and effectiveness of diagnostic imaging. I stand in full support of the Massachusetts Society of Radiologic Technologists (MSRT) and their recommendations to uphold strong professional standards for radiologic imaging.

I urge the Department of Public Health to carefully consider these concerns and ensure that any changes to radiologic licensing regulations prioritize patient well-being and maintain the integrity of our profession.

Sincerely,

Emma LeBel