From:

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Subject: Public Hearing on Proposed Amendments to 105 CMR 125.00

Dear Members of the Massachusetts Department of Public Health,

My name is Erin Peterson and I am the acting Program Director of Radiography Program at Bunker Hill Community College. 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 understand the purpose of these proposed changes is to decrease barriers to enter into the Medical Imaging field while maintaining the standards for patient safety and quality of care, however I have significant concerns about the educational training for the limited scope license.

Currently, full-scope radiography programs in the state of MA maintain high educational standards to the profession through outside accreditation from the Joint Review Commission in Radiologic Technology (JRCERT). The proposed changes do not include specific educational standards for their programs. Additionally, programs are struggling to keep adequate program numbers due to the lack of staffing at clinical sites to support our students.

As an educator, I do believe there is room for a pathway into becoming a full scope radiologic technologist, but currently there is no advance pathway to do so. There are radiology aide working in hospitals in similar roles to medical assistants and they are doing very will in their position while still encouraging them into radiography programs.

Allowing persons with limited education can cause negative effects to the patient population especially in the urgent care centers to which these regulation changes are being driven. It would be important to hear the perspectives of those actively working in UCC to see how it could be more beneficial to have a LXMO.

I strongly oppose the proposed amendments to 105 CMR 125.000 Licensing of Radiologic Technologists.

Sincerely,



Erin M Peterson BS RT (R) (ARRT)