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To: Massachusetts Department of Public Health

Subject: Written Testimony for Limited Scope Radiography (105 CMR 125.00) – March 26, 2025

Dear Members of the Massachusetts Department of Public Health,

My name is Joseph Mansell and I am the Program Director for the Radiologic Technology program at 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.

Radiologic Technologists undergo extensive education and clinical training to ensure proper imaging techniques, radiation safety, and high-quality diagnostic results. People pursuing a limited license must have a similar education in order to ensure proper radiation safety practices. I question if the training will be much shorter than what a fully licensed technologist would receive. If the training is not much different than a fully licensed technologist will there be enough applicants to grow a program at a community college? I do know that the New Hampshire Technical Institute where most of the rad techs in New Hampshire are trained do not have a program for limited licensed technologists.

One would think that a limited operator would help Urgent Care Centers with their imaging needs. However, since limited license technologists are only permitted to practice 2 out of 5 anatomic categories this would not be very helpful. In addition, since abdomen, ribs, and pelvis x-rays do not fall under these categories, I’m not sure how helpful would a limited licensed technologist would be. I have heard of people taking X-rays for private physicians without a license and I believe the limited license technologist will be pressured to take exams they have not been properly trained for. I questions how will this be monitored?

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,

Joseph Mansell, MS, RT(R)