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| Regulation | **Comment** |
| 105 CMR 125 | **Change the title of the regulations to Licensing of Radiologic Technologist and Limited X-ray Machine Operators. Job titles are important because they provide a clear and concise way to describe an individual's role, responsibilities, and level within an organization. They contribute to workplace hierarchy, helping employees and stakeholders understand the individuals areas of expertise.** **Referring to an individual licensed to create medical images of limited anatomic areas can lead to confusion and ambiguity.****A Radiologic Technologist is certified and registered with the American Registry of Radiologic Technologists (ARRT)or Nuclear Medicine Technology Certification Board (NMTCB).****An individual licensed by the state to practice in limited aspects of medical imaging is not educationally prepared or clinically competent to meet the qualifications to become a certified Radiologic Technologist.**  |
| 105 CMR 125.001 | **Add Limited X-ray Machine Operator to distinguish between a fully licensed Radiologic Technologist and a Limited X-ray Machine Operator.** |
| 125.002(D) | **There is no certification agency for limited x-ray machine operators. Practice Standards for Limited X-Ray Machine Operators have been established by the American Society of Radiologic Technologists.**  |
| 125.002(E) | * **Strike out the “al” suffix as it is unnecessary as we are known as Radiologic Technologists and is inconsistent with terminology throughout the regulations**
* **Strike out “shall work under the supervision of a radiologist and”**
* **There are numerous scenarios where a Radiologic Technologist works independently - physicians office, surgical center, or pain management center-and does not work with a radiologist and carries out the medical imaging orders of a licensed healthcare provider.**
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| 125.003 | **Change definition to:Limited X-Ray Machine Operator (LXMO) means the individual who assists a licensed practitioner or Radiologic Technologist during static radiographic procedures by performing diagnostic radiographic procedures, as prescribed by a licensed practitioner, of a specific area of anatomical interest based on limited education, training and licensure/certification within the individual’s scope of practice.** **This definition is consistent with the ASRTPractice Standards for Medical Imaging and Radiation Therapy**  |
| 125.003: Definitions - Radiologic Technologist  | **Strike out: Limited Scope of Practice in Radiography.****An individual licensed by the state to practice in limited aspects of medical imaging is not educationally prepared or clinically competent to meet the qualifications to become a certified Radiologic Technologist.**  |
| 125.003: Definitions -Computed Tomography (CT) | **Fix American Society of Radiologic Technologists**  |
| 125.003: Definitions - Mammography | **Fix American Society of Radiologic Technologists** |
| 125.004 | **Keep the “A” and undo the numbering as an inspector would site: 125.004(A)(1) andA). Put Limited X-ray Machine Operator at the bottom of the list - 9 - so that nothing in the section has to be renumbered.** |
| 125.004 | **Change title of section to:Licensing Disciplines and in “A”, strike out “to Radiologic Technologists” as a clear distinction should be made between a fully licensed technologist and a limited machine x-ray operator.** |
| 125.005 | **Add Limited X-ray Machine Operator in section title. Separate criteria more clearly identifies titles and scope of practice.** **Create section “B” that clearly defines the criteria for a Limited X-ray Machine Operator:(B) An applicant for licensure as a Limited X-Ray Machine Operator shall at the time of application:** * **(1)  Be at least 18 years of age; and** **(2)Have successfully completed a four-year course of study in a** **secondary school approved in Massachusetts, or hold a high school diploma from another state, or have passed an approved equivalency test; and** **(3) Have successfully completed a course of study that adheres to the ASRT Limited X-Ray Machine Operator Curriculum and ARRT Limited Scope of Practice in Radiography Content Specifications at an education program approved by the Department; and** **(4) Have successfully passed the examination for LimitedX-Ray Machine Operator offered by the department and administered by ARRT or other national or international certifying board approved by the Department;** **(a) Minimum passing score shall be 80%**
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|  | **(b) The applicant shall have three attempts to achieve a passing score.**1. **Separate criteria more clearly identify titles and scope of practice**
2. **The minimum standards for education and training should be included in the regulations.**
3. **Radiologic Technology degree programs have external accreditation to ensure that minimum didactic and clinical standards of the profession are met. There is no external oversight or accreditation of limited scope training.**
4. **Does the RCP have adequate staffing and expertise to evaluate curriculum from training programs? Will an Advisory Committee be utilized and consulted for such a review?**
5. **Minimum passing score of 80% is consistent with NH regulations**
6. **Limit exam attempts to be consistent with ARRT requirements**
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| 125.005(C) | **This section should be edited but not removed.**  **(1)  Identifying the three major national certification boards (ARRT, NMTCB and CBRPA) provides transparency and reference to the high standards of education and clinical competence expected by the department for licensure as a Radiologic Technologist in Massachusetts.**  **(2)  These three international certification boards are identified as meeting or exceeding the qualifications set by our national boards.** * + **Medical Radiation Practice Board of Australia** **(MRPBA)**
	+ **Health and Care Professions Council (HCPC)**
	+ **Canadian Association of Medical Radiation** **Technologists (CAMRT)**
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|  | **(3) If an inspector finds a technologist not certified by either the ARRT, NMTCB, or CBRPA or the international boards, and this section is removed, there is no way to cite the technologist.** |
| **125.005(C)(2)** | **(C) Fix Technology to Technologist****(2) strike out Radiologic Technologist****Have 125.005(C)(2) just read: to obtain a license from the Department.**  |
| **125.005 (A)(5)** | **Strike out Except for Limited Scope of Practice in Radiography, and create separate section for Limited X-ray Machine Operators. See comments above.** |
| **125.005(B)** | **Move this section to 125.005(D) so that it follows licensing of a Radiologic Technologist and clearly separates a Radiologic Technologist and Limited X-ray Machine Operator.** |
| **125.006(D)** | **Do not move this regulation out of section for Advanced Practice Discipline. This statement is specific to the Radiologist Assistant Scope of Practice and is a requirement of American College of Radiology Accreditation. Specific to RA required by ACR.**  |
| **125.008** | **Add (B) Temporary Licenses will not be issued to Limited X-ray Machine Operators as there are currently no JRCERT/JRCNMT accredited programs.** |
| **125.009(A)(1)** | **Change Limited Scope to Limited X-ray Machine Operator.**  |
| **125.009(A)(1)(a)** | * **There is no “discipline” specific categories for Limited X-ray Machine Operators. Currently, the MSRT assigns categories in Diagnostic Radiology, CT, Mammography, and Radiation Protection to name a few. There is no specific category for Chest, Spine, or Extremities.**
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| **125.009(2)(a)** | **Keep “in which the individual is licensed”. There is currently no category for Radiologic Technology. The categories are Diagnostic Radiology, Nuc Medicine, and Radiation Therapy. This ensures that the licensee remains current in their licensed area of practice.**  |
| **125.009(B)** | **Should not be removed. The list of CE approval agencies is current and valid. Identifying them in the regulations provides transparency of the standards established for continuing education for Radiologic Technologists. If an inspector finds a CEU like from the AMA, the inspector would have not way to cite the technologist. You can’t cite a policy or a list on the Radiation Control Program’s website.** |
| **125.009(B)** | **The proposed change to 125.009(B) should go back to 125.009(C). Take out licensed Radiologic Technologist and change it to “each licensee”. After “each workplace where employed as a Radiologic Technologist” add “or Limited X-ray Machine Operator”. Distinguish between a Radiologic Technologist and Limited X-ray Machine Operator. An individual licensed by the state to practice in limited aspects of medical imaging do not meet the qualifications of a certified Radiologic Technologist**  |
| **125.009:Probation Status** | **Take out Radiologic Technologist and add licensee. An individual licensed by the state to practice in limited aspects of medical imaging do not meet the qualifications of a certified Radiologic Technologist**  |
| **125.010(A)** | **Take out Radiologic Technologist and add licensee. An individual licensed by the state to practice in limited aspects of medical imaging do not meet the qualifications of a certified Radiologic Technologist**  |
| **125.010(A)(4)** | **Strike out “except for Limited Scope of Practice in Radiography”. This will ensure the public that those with a Limited X-ray Machine Operator have taken a national exam offered by the ARRT and have had similar educational and clinical training. An individual licensed to practice in limited aspects of medical imaging do not meet the qualifications of a certified Radiologic Technologist**  |
| **125.010(C)** | **Strike out Radiologic Technologist and add “licensee"** |
| **125.011(A)** | **Strike out Radiologic Technologist and add “licensee”** |
| **125.011(A)(1)(b)** | **Strike out “except for Limited Scope of Practice in Radiography”. This will ensure the public that those with a Limited X-ray Machine Operator have taken a national exam offered by the ARRT and have had similar educational and clinical training.**  |
| **125.011(A)(2)(c)** | **Strike out “except for Limited Scope of Practice in Radiography”. This will ensure the public that those with a Limited X-ray Machine Operator have taken a national exam offered by the ARRT and have had similar educational and clinical training.**  |
| **125.012:Posting**  | **After “A Radiologic Technologist”, add and Limited X-ray Machine Operator** |
| **125.012(A) and (B)** | **After “A Radiologic Technologist”, add and Limited X-ray Machine Operato**r |
| **125.014** | **Add Limited X-ray Machine Operator to this section** |
| **125.020** | **After “A Radiologic Technologist”, add or Limited X-ray Machine Operator** |
| **125.021(A)(4)** | **Add Limited X-ray Machine Operator to this section** |
| **125.021(A)(4)** | **Change radiologic technology license to “Radiologic Technologist” license.**  |