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Dear Members of the Massachusetts Department Public of Health,

My name is Karen Farris and I am a licensed Radiologic Technologist and a former employee of the Radiation Control Program. I am submitting this testimony in opposition to the implementation of Limited Scope Radiography in Massachusetts.

I believe the proposed amendments should be tabled until either the positions in MGL Chapter 111 Section 5L are filled and convened or as we have done in the past, create a working group.

Developing a Limited X-ray Machine Operator license without proper education and clinical training will not be sufficient to prepare individuals to have the skills needed to acquire quality images and apply appropriate Radiation Safety principles. Patient safety and diagnostic quality must remain the top priority in medical imaging. Radiologic Technologists undergo extensive education and clinical training to ensure proper imaging techniques, Radiation Safety, and high quality diagnostic results. Contrast that to Limited Scope X-ray Machine Operator who receives significantly less training, which raises concerns about image quality, increased radiation exposure, and potential misdiagnosis. Poorly positioned or low-grade images can lead to repeat exposures, unnecessary delays in care, and increased healthcare costs.

Massachusetts is known for its high standards in patient care. We have had other countries and other states look at our regulations when making amendments. Lowering qualifications for individuals performing x-ray exams risks compromising the safety and effectiveness of diagnostic imaging. Again, a limited license will not provide individuals the knowledge and experience to produce a diagnostic image and follow the principals of ALARA.

Therefore, if the Department of Public Health decides to proceed with the proposed amendments, I offer the following comments.

Sincerely,

Karen Farris, MHA, RT(R)(M)(ARRT) 1 Fernview Ave

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