**From:** Kristina Prinzivalli

**To:** [DPH-Testimony, Reg (DPH)](mailto:RTestimony@MassMail.State.MA.US)

**Subject:** Re: Opposition to Proposed Amendments to 105 CMR 125.000

**Date:** Tuesday, March 25, 2025 7:16:43 PM

**Attachments:** image001.png

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03-26-2025

Kristina Prinzivalli

190 Boston Street, Middleton MA 01949 [kprinziv01@northshore.edu](mailto:kprinziv01@northshore.edu)

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 Kristina Prinzivalli, 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.

Why should Massachusetts allow other medical professionals to perform radiography when only fully licensed radiologic technologists have the specialized training necessary to ensure patient safety and accurate results? Fully licensed technologists are essential to maintaining high standards of care and minimizing the risk of misdiagnosis or harm.

Radiologic

technologists undergo rigorous education and certification to properly operate imaging equipment, understand radiation safety, and position patients correctly. Allowing unqualified individuals to perform these procedures could jeopardize patient health and undermine the integrity of diagnostic imaging. Only licensed radiologic technologists should be trusted with this

critical responsibility to ensure the highest quality care.

Central to our training is the ALARA (As Low As Reasonably Achievable) principle, which focuses on minimizing radiation exposure to both patients and healthcare workers while still ensuring high-quality diagnostic images. Radiologic technology programs teach students how to precisely calculate and adjust radiation doses, taking into account factors such as the patient's size, age, and medical condition. In addition to mastering the technical aspects of operating imaging equipment, students are trained in the use of protective measures like lead shielding and proper patient positioning to reduce unnecessary exposure. This rigorous education ensures that only licensed radiologic technologists have the expertise needed to safely and effectively perform radiographic procedures.

Massachusetts has long been recognized for having some of the best healthcare in the nation, with a strong commitment to patient safety, advanced medical practices, and highly trained professionals. This reputation has been built over years of maintaining rigorous standards and ensuring that every patient receives the highest quality of care. Allowing unqualified individuals to perform radiographic procedures would undermine this legacy and jeopardize the safety and well-being of patients for the sake of convenience or cost-saving measures. To preserve the excellence of Massachusetts' healthcare system, it is crucial that we

continue to trust only fully licensed radiologic technologists to carry out these critical tasks, ensuring that patient care remains both safe and effective. I urge the Commonwealth to keep our citizens safe, and keep radiologic technologists thriving in our fields.

Best Regards, Kristina Prinzivalli