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Massachusetts Department of Public Health

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 Lisett Reyna Verdecia, 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.

In my opinion the Limited Scope Radiography Licensure in the long run is not going to help the patients, technologists or the businesses. It’s going to be low quality patient care because technologists need the proper knowledge of physics and not be a button pusher. Regarding businesses, how are business owners going to handle the burden of relying on only one or two persons qualified to take abdomens, ribs or any other exams that are not listed on the limited license? On the patient side, how are limited technologists going to perform exams that maybe they learned on the site but are not really licensed for? Are they going to perform the exams without the proper training and schooling?

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,

Lisett Reyna Verdecia