**Subject: Licensing of Radiologic Technologists**

My name is Lynne Davis, and I am a Registered Radiologic Technologist. I am submitting this written testimony on March 24, 2025, connected to the hearing on **Licensing of Radiologic Technologists** scheduled for March 26, 2025. Thank you for this forum of civil discourse. I oppose implementing limited-scope radiography in Massachusetts and this is why.

Whenever it becomes more challenging to hire Registered Radiologic Technologists, the Department of Public Health turns to the limited-scope Xray Machine Operator as a viable way to manage the shortage of qualified technologists. A less qualified technician/operator is not the answer. Registered Radiologic Technologists:

* undergo extensive education and clinical training to ensure proper imaging techniques, radiation safety, and high-quality diagnostic results.

In contrast, Limited-Scope X-ray Machine Operators (LXMOs):

* receive significantly less training, which raises concerns about image quality, increased radiation exposure, and potential misdiagnoses.

Poorly positioned or low-quality images can lead to:

* repeat exposures, unnecessary delays in care, and increased healthcare costs.

Once a Limited Scope Xray Machine Operator is allowed to expand their role in a physician’s office, it quickly expands to the limited operator being asked to/required to perform more imaging than their expanded license provides them training to do. This goes unchecked along with the unchecked image quality and increased exposure to the patient of exams they are not qualified to do.

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. Don’t cut corners in imaging quality and radiation protection which can lead to patient misdiagnoses.

I stand in full support of the Massachusetts Society of Radiologic Technologists (MSRT) and their recommendations to uphold proven and 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.

Thank you for your time and consideration.

Sincerely, Lynne Davis, RT(R)

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