Mary Tang

171 Spring St, Medford MA, 02155

marytang95@gmail.com

Cell: 781-866-3402

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To: Massachusetts Department of Public Health

Subject: Written Testimony for Massachusetts Radiologic Technologist Licensure Changes

Dear Members of the Massachusetts Department of Public Health,

My name is Mary, and I am currently a senior medical radiography student at Bunker Hill Community College. I am writing this testimony in relation to the public hearing on proposed amendments to 105 CMR 125.000 Licensing of Radiologic Technologists. I am writing to express my strong opposition to the proposal for limited scope radiography in Massachusetts. As someone who deeply values patient safety and the integrity of medical practices, I believe that such a proposal poses serious risks that could undermine both.

One of the most critical issues with limited scope radiography is the potential compromise of patient safety. Radiologic imaging requires precise training and skill to accurately interpret and apply imaging techniques. Limiting the scope of practice for radiologic technologists (RTs) to certain procedures increases the risk of incorrect imaging, improper radiation exposure, and potentially missed diagnoses. Inadequate training and experience in interpreting radiographic images can lead to mistakes that could jeopardize a patient’s health.

Radiographers are an essential part of the healthcare team, and their education and expertise play a significant role in ensuring high-quality imaging results. Limiting their scope of practice may result in less comprehensive imaging. This would diminish the overall quality of care that patients receive and creates a significant gap in healthcare standards.

A key reason why I oppose limited scope radiography is that proper education and certification are crucial for anyone working in the field of radiology. As a student, first-hand, I understand the importance of education for the field. Radiologic technologists spend a minimum of 2 years learning about radiation safety, anatomy, patient care, and proper imaging techniques. Limiting the scope of practice would diminish the importance of this extensive education, and could ultimately result in a lack of qualified professionals in the field which would look really bad, especially in the state of Massachusetts where the education and healthcare system both are highly valued.

If the scope of radiography is limited, it could set a dangerous precedent for the future of the profession. It would likely reduce the perceived value of radiologic technology training. The radiologic technologist profession deserves respect for its vital role in diagnosing patients and limiting its scope undermines that role.

Rather than restricting the scope of radiography, I urge Massachusetts lawmakers to consider ways to improve training and expand opportunities for radiologic technologists. Investments in continued education, support for advanced certifications, and maintaining high standards for training would help ensure that the healthcare system provides the best possible care without compromising patient safety.

In conclusion, I oppose the implementation of limited scope radiography in Massachusetts because of the potential risks to patient safety, the degradation of care quality, and the undervaluing of radiologic technologists’ critical skills. I urge you to reconsider this proposal and work toward solutions that prioritize comprehensive education, safety, and the highest standards of medical care.

Thank you for your time and consideration.

Sincerely,

Mary Tang

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