

**TESTIMONY BEFORE THE DEPARTMENT OF PUBLIC HEARING ON PROPOSED AMENDMENTS TO 105CMR 125. LICENSING OF RADIOLOGIC TECHNOLOGISTS MARCH 26, 2025**

The Massachusetts Radiological Society (MRS) is the state chapter of the American College of Radiology (ACR). Our approximately 1500 members and leaders represent diagnostic and interventional radiologists, radiation oncologists and medical physicists in our state. The MRS is devoted to serving patients and society by advocating for radiology professionals to advance the science, social, and economic practice of radiology. The MRS appreciates the opportunity to comment on proposed amendments that would add a new Limited Scope of Practice in Radiography discipline to existing regulations governing Licensure of Radiologic Technicians (RT’s).

The MRS understands and appreciates the Department of Public Health’s (DPH) intent to address workforce challenges by expanding access to RT’s in all care settings, reducing pressure on emergency departments for non-emergency care, and fostering career advancement opportunities for RT’s. Indeed, 39 other states have regulations in place for limited scope licensure of RT’s, and such practitioners represent approximately 5% of the total certified technologists in radiography in those states.

The MRS and the ACR have long advocated for state licensure, certification, and other regulatory protections designed to ensure the qualifications of individuals operating imaging equipment. These policies are grounded in our commitment to safeguarding patients, enhancing diagnostic accuracy, and upholding the highest standards of professional practice. The MRS and the ACR are joined in our support for credentialing by professional guidelines from the American Society of Radiologic Technologists (ASRT), the American Registry of Radiologic Technologists (ARRT), and the American Registry for Diagnostic Medical Sonography (ARDMS)—all of which affirm that comprehensive credentialing and licensure are effective in ensuring competent, ethical, and safe practice. These credentials help to ensure:

* Enhanced Patient Safety: Properly credentialed technologists reduce the risk of medical errors and the need for repeat imaging, improving both patient outcomes and operational efficiency.
* Consistency in Quality of Care: National certification ensures that all technologists meet a recognized standard of training, knowledge, and clinical proficiency, regardless of their background or place of education.
* Recognition of Professional Expertise: Credentials signify a commitment to ongoing education and adherence to evolving best practices, which is critical in fields undergoing rapid technological advancements.

We are pleased to see the inclusion of credentialing, education and training, licensure, competency exams and continuing education requirements in the draft regulations governing limited scope RT’s.

The MRS also appreciates that the proposed regulations retain the following language, now 125.002: General Provisions (E): A Radiological Technologist, including those licensed in an advanced practice discipline, shall work under the supervision of a radiologist and may not interpret images, make diagnoses, or prescribe medications or therapies. Such supervisory requirements and prohibitions on scope of practice for RT’s and limited scope RT’s are important for ensuring patient safety and quality imaging across all practice settings.

Respectfully,

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Additionally, the MRS offers the following comments:

* Ensure clear monitoring requirements and penalties for non-compliance.
* Ensure appropriate capacity for training slots for both limited license and fully licensed RT’s such that valuable clinical training opportunities are available for all categories of licensure. It is our understanding that there are only 14 approved training entities currently in Massachusetts. Broadening the number of training programs and clinical mentorships available would be benficial, especially in urgent care centers where limited license radiology technicians are likely to be employed now that such facilities are licensed.
* To ensure a smooth transition into the workforce for newly licensed limited scope RT’s and coordination between those providers, fully licensed RT’s and the Department of Public Health, the MRS suggests working with the Advisory Commission on Radiologic Technologists Licensing. Although we understand that the statutory Commission has not met since 2018, we believe that such collaboration and communication would be beneficial moving forward.

Thank you for your consideration of these comments.

Respectfully,

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