March 7, 2025

William Anderson

Office of the General Counsel

Department of Public Health

250 Washington Street

Boston, MA 02108

**RE: 105 CMR 125.000: Licensing of Radiologic Technologists**

Dear Mr. Anderson:

On behalf of the Massachusetts Urgent Care Association, please accept this written testimony to express our SUPPORT of the proposed amendments to 105 CMR 125.000 adding a new Limited Scope of Practice in Radiography discipline for a licensed Radiologic Technologist (RT). The creation of this new license discipline will enhance access to community-based providers, improve patient care, answer workforce demands, and reduce strain on emergency departments. Community-based providers like Urgent Care Centers (UCCs) and their patients would significantly benefit from medical professionals becoming Limited Scope RTs and allow access to appropriate services within their communities.

UCCs provide care for non-life or -limb threatening illness and injury on a walk-in basis. All of our centers are open seven days a week, nights, weekends and holidays. All of our centers are staffed by Massachusetts state-licensed providers and offer medical examination, diagnosis, and treatment for non-life or limb threatening illnesses and injuries, and onsite evaluation services, including radiology and laboratory services. Our UCCs are staﬀed by Physicians, Physician Assistants and/or Nurse Practitioners, EMTs, nurses, paramedics, and LPNs who are clinically supported by Medical Assistants and, in many cases, an RT.

According to the American Society of Radiologic Technologists (ASRT), the vacancy rate for radiographers surged to 18.1% in 2023—three times higher than in 2021—marking the highest recorded rate since ASRT began monitoring workforce trends in 2003. This shortage is severely aﬀecting smaller and more independent practices. Smaller healthcare providers in particular are running out of solutions to address RT staffing challenges beyond that of curtailing or eliminating their radiology services and redirecting patients to additional sites (often with higher costs of care) and adding financial burden onto the entire healthcare system–potentially forcing a compromise of patient care.

Limited Scope Licensure presents a solution to this problem that preserves patient safety and care quality, improves patient compliance and outcomes, keeps overall healthcare costs low, and ensures RTs can utilize their full scope of expertise in the areas where that expertise is most needed. Thirty-five states have already implemented Limited Scope Licensure. Adopting these regulations in the Commonwealth puts Massachusetts more in line with effective healthcare administration. It will ease the burden on the RT labor pool and free up more RTs to work in higher-acuity sites of care.

These regulations will help ensure that UCCs can continue to provide on-site imaging, thereby reducing patient referrals, alleviating emergency department congestion, and improving overall healthcare system efficiency. They also will provide clear education and examination criteria so that limited-scope radiographers are adequately trained to perform safe and effective imaging procedures. Crucially for our staff, this proposal will also create new employment pathways, fostering workforce growth and professional advancement in healthcare.

The expansion of Limited Scope Licensing also creates opportunities for our RTs to work in training, supervisory, and quality assurance roles which creates new professional growth trajectories for those RTs interested in practicing in the Urgent Care setting.

As it relates to education and examination criteria, we caution the Department against creating unintended barriers to entry through the “course of study” approval process by, for example, mandating that Limited Scope Licensure require a certificate program through an accredited community college. While this may be one viable pathway, requiring this is would severely limit the number of students able to get into the pipeline and would severely extend the length of time that a student needs to be in a program. Our UCCs have had long-standing success in New Hampshire, Maine, and other jurisdictions with implementing high-quality programs like *Control the Dose*, which have prepared our Limited Scope X-Ray Techs not only for licensure, but also for successful careers in this practice area.

We thank the Department for taking the initiative to address this critical issue and urge you to consider the positive impact of these new Limited Scope of Practice in Radiography regulations on our industry. In so doing, you will enable UCCs to continue our mission of providing accessible, cost-effective, and convenient care to patients across the commonwealth.

Thank you for your consideration. Should you have any questions, we would welcome the opportunity to discuss this with you further.

Sincerely,

James Brennan

Jim Brennan

Massachusetts Urgent Care Association



Gareth Dickens

ConvenientMD Urgent Care