**Megan Dolan**

**191 Fays Ave**

**Lynn, MA 01904**

**(781) 654-7658**

**megandolan42@gmail.com**

**To: Massachusetts Department of Public Health**

**Subject:** 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 Megan Dolan, 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.

I oppose these changes for a variety of reasons. Firstly, I believe that completing the full Radiologic Technology program is essential to prioritizing patient care and safety. Following the completion of an R.T. program all of the students are well-rounded and able to think critically and on their feet. I, as well as all of my fellow students, have dedicated two years of our lives to complete this program, which included three months during the summer of working 40 hours per week. Those clinical hours during the summer were in addition to all of the clinical shifts that we partake in throughout a typical school year. Joining this program put a strain on finances and home life for many, but we all knew it would be worth the reward in the end. The time and effort that all of us put into becoming successful radiologic technologists is something that we are all proud of and find that the full program’s curriculum is necessary in preparing us to deliver the best healthcare and diagnostic imaging as possible.

When I heard about this proposed amendment it made me saddened and fearful that the passing of it would take jobs away from all of the techs who have worked tirelessly, day after day, to get to this point in our education and career. I am beyond excited to start my career in just a few short months, and am deeply passionate about how completing a full program is essential for any hospital or office. I don’t think that hiring a limited license tech would be beneficial in that there will always be something they are not trained nor certified to do. If a limited license tech is only able to test for two procedural specialties, who is going to be monitoring what those specialties are and whether or not they are performing outside of their scope of practice? I believe this is a Pandora’s Box that Massachusetts should keep closed. I believe that the real benefit will come from opposing this proposed amendment because not only will the radiologic techs of Massachusetts feel protected, but so will our patients.

Massachusetts is known for its high standards in patient care. People fly to Boston from all over the world in order to receive the incredible healthcare that this state has to offer. Lowering qualifications for individuals performing X-ray exams risks compromising the safety and effectiveness of diagnostic imaging. It also compromises the careers that radiologic technologists have dedicated their time and heart to. 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,

Megan Dolan