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**To:** [DPH-Testimony, Reg (DPH)](mailto:RTestimony@MassMail.State.MA.US)

**Subject:** Public Hearing: Proposed amendments to 105 CMR 125.000 Licensing of Radiologic Technologists.

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To the Members of the Department of Public Health,

Thank you for the opportunity to comment on the proposed changes to 105 CMR 125.000 Licensing of Radiologic Technologists regulations and the introduction of a Limited Scope of Practice in Radiography discipline

I am have been a licensed Radiologic Technologist since the inception and of Licensure in Massachusetts and in the profession for over 40 years, I had been a long time member of the MA. Advisory Commission for the Licensing of Radiologic Technologist in Massachusetts ,a two time President of the Massachusetts Society of Radiologic Technologists, President and Chairman of our National Professional organization of the American Society of Radiologic Technologists as well serving 8 years as a trustee and president of the professions national certification agency , the American Registry of Radiologic Technologists

**I** understand that the intent of this initiative is to decrease barriers to entry into the field while maintaining standards for patient safety and quality care. However, we have significant concerns regarding the implementation of limited scope licensing for the following reasons:

1. **Regulatory Oversight and Advisory Commission on Radiologic Technologist Licensing Review:** One of my main concerns is that the proposed revision were developed without consultation or input with the Advisory Commission on Radiologic Technologist Licensing, as required by MGL111.5L, which has not been convened since 2018. A collaborative approach is essential to ensuring that all perspectives are considered and that any updates align with the highest standards of radiologic practice. I strongly recommend that the Department of Public Health reconvene the Advisory Commission before moving forward with any changes to the proposed amendments, and changes.
2. **Job Titles in Professional:** A **Radiologic Technologist** is certified and registered with the American Registry of Radiologic Technologists (ARRT)or Nuclear Medicine Technology Certification Board (NMTCB). I recommend that the title of **Limited X-ray Machine Operator (LXMO**), be used which is consistent with the ASRT Practice Standards for Medical Imaging and Radiation Therapy be used. If included in the regulations all requirements and standards will need to follow the ASRY Practice Standards and ARRT Certification requirements . Limited X-Ray Machine operators will not be Radiologic Technologists as they will not be fully licensed and certified as the Radiologic Technologist must be. There sections and titles should be separate in the Regulations.
3. **Lack of Pathways for LXMO to Become Certified Radiologic Technologists :** While there may be a potential for the LXMO to progress to a fully Licenses Radiologic Technologists there are no pathways currently and there would need to be significant work and financial resources to accomplish it
4. **Worksite Limitations**: There would be significant limitations if the LXMOs would

be considered for work in a hospital as they are not permitted to perform key imaging procedures, important in this setting and include: Fluoroscopy, Procedures utilizing contrast media, Imaging of the ribs, sternum, abdomen, hip, and pelvis and Mobile and remote imaging,.

1. **Regulation Development**: Should the Department of Public Health decide to proceed with implementing limited scope licensing, significant revisions are necessary to ensure that scope of practice and educational requirements are clearly defined while maintaining high standards for patient care and radiation safety.

My hope is that the Radiation Control Program will be committed to working collaboratively to develop solutions that enhance workforce capacity without compromising patient radiation exposure safety or the integrity of the radiologic technology profession.

I would welcome the opportunity to join a working group to address the regulation edits or any related projects.

Thank you

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