# 3/25/2025

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# 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 Nicole Kolsky, 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 fear the quality of patient safety may diminish as companies may employ limited license techs and informally cross train them to take x-rays of anatomy they are not licensed to do so. Proposed amendment #2 (105 CMR 125.005) point #4 states a limited scope license will allow a person to practice radiography in “up to two of the following procedure specialties…”. Language in the proposition leaves out pertinent areas like the abdomen, pelvis, and the pediatric population, all of which are abundant in urgent care and other healthcare offices and are more radiosensitive. Being so limited leaves room for

great error and I fear companies may take advantage if wording is not specific. I fear a limited license without specificities in these areas has the potential to be harmful.

Massachusetts is known for its high standards in patient care. Lowering qualifications for individuals performing X-ray exams risks compromising the safety and effectiveness of diagnostic imaging. 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, Nicole