25 March 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 Olivia Nardone, 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 the implementation of this amendment for the wellbeing of patients, the lack of ability to monitor which exams a limited license technologist is completing, and convenience for the patient.

The patient is in the care of the technologist for every exam. Only having a limited knowledge with technique, positioning, and radiation safety, a limited license will only provide a minimum education. This is at the expense of the patients coming to these facilities for care.

In a two year radiologic technology program, you are fully immersed in the action of x-ray. You are able to learn each exam and then prove your proficiency. In a limited scope license, you are only responsible for the two procedures you specialized in which creates gray areas at facilities that have a variety of exams ordered. This brings up the question how will the exams and images be monitored for proof of compliance to the rules of a limited license.

In regards to convenience for the patient, it is inequitable for them to go to an urgent care and not be able to get their abdomen x-rayed because they do not have a technologist to complete that. They would then have to go to another urgent care or even the emergency room. This takes the convenience out of urgent care or off site facilities.

Overall, I understand the idea behind having an extra career opportunity that could help the radiology workforce. On the other hand, this limited scope license is bound to cause problems in the future regarding monitoring, the patients safety, and convenience.

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,

Olivia Nardone