**From:** Rosa Zappa

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

**Subject:** limited scope of practice license

**Date:** Tuesday, March 25, 2025 12:33:06 PM

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**March 25, 2025 Rosa Khoury**

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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 Rosa Khoury, 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.

Why do you oppose these changes?

A limited scope license for radiologic technologists undermines the quality and safety of patient care by allowing individuals with minimal training to perform complex imaging procedures. Radiologic technology requires a deep understanding of anatomy, radiation safety, positioning techniques, and pathology to ensure accurate diagnostics and minimize radiation exposure. Limiting the scope of licensure encourages inadequate training, increasing the risk of errors that could lead to misdiagnosis, unnecessary radiation exposure, or compromised patient outcomes.

Furthermore, reducing licensing requirements devalues the profession and creates disparities in patient care, as those with limited scope licenses may not have the same level of competency as fully licensed radiologic technologists. Instead of lowering standards, we should prioritize comprehensive education and certification to maintain high-quality imaging services and protect patient health.

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, Rosa Khoury