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**Subject: Licensing of Radiologic Technologists**

Dear Members of the Massachusetts Department of Public Health,

My name is Susan Whittier, and I am a Registered Radiologic Technologist and Program Director at Quinsigamond Community College Radiologic Technology program. I am submitting this written testimony in relation to the public hearing on proposed amendments to 105 CMR 125.000 Licensing of Radiologic Technologists. scheduled for March 26, 2025. I appreciate the opportunity to provide my perspective on this important issue.

Patient safety and diagnostic accuracy must remain the top priorities in medical imaging. Radiologic Technologists undergo extensive education and clinical training to ensure proper imaging techniques, radiation safety, and high-quality diagnostic results. In contrast, Limited-Scope X-ray Machine Operators (LXMOs) receive significantly less training, which raises concerns about image quality, increased radiation exposure, and potential misdiagnoses. Poorly positioned or low-quality images can lead to repeat exposures, unnecessary delays in care, and increased healthcare costs.

As an educator of Radiologic Technologists who consistently has issues obtaining clinical sites for training Radiologic Technologists and understanding the limitations of a LXMO there are many concerns regarding proper training and clinical site placements for this new level of worker. Who will be training the full license technologists if many facilities have LXMO licensed individuals? This will only compound the shortage issue; it will not eliminate it. As an experienced tech with 32 years in this industry, this is a step backwards instead of forward and seems like the only benefit to this proposal is a cost saving measure for Urgent Care facilities who just don’t want to pay a Radiologic technologist what they deserve. When learning about the proposal there seems to be a lot of holes in this proposal that need to be filled prior to gaining my support.

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.

Thank you for your time and consideration.

**Sincerely,**  
Susan Whittier MPH RT(R)(M)(BS)