



Massachusetts Society of Radiologic Technologists

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Testimony for Public Hearing
Board of Registration in Podiatry
On Behalf of the Massachusetts Society of Radiologic Technologists
June 5, 2015

Good Morning and thank you for this opportunity to voice my concern regarding 249 CMR 4.01, the Board of Registration in Podiatry's interpretation of current regulations and the current practice of podiatric assistants taking x-rays.

My name is Patricia Willett, I am a radiologic technologist and educator, certified by the American Registry of Radiologic Technologists and licensed to practice by the Commonwealth of Massachusetts. I am here today as a representative of the Massachusetts Society of Radiologic Technologists (MSRT). The MSRT is a professional membership organization that serves as the voice for more than eight thousand licensed radiologic technologists in Massachusetts. We are a state affiliate of the American Society of Radiologic Technologists (ASRT) with a membership of more than 150, 000 technologists nationwide.

We recognize that it is within the scope of practice for licensed podiatrists to take radiographs however, they cannot designate that responsibility to podiatric assistants or other individuals who do not have the equivalent knowledge and competence to perform radiographic images. This practice has the potential to compromise the health and safety of the residents of the Commonwealth due to the potential effects of ionizing medical radiation. Any person who is administering ionizing radiation must have adequate education and training to create optimal radiographic images and provide proper radiation protection to both the patients and healthcare workers.

The current practice of podiatric assistants performing medical imaging is in conflict with 105 CMR 125.000 and 105 CMR 120.403. These regulations were established to ensure that only educationally prepared and clinically competent professionals are performing procedures that utilize ionizing radiation, so that patients can be assured that they are receiving the best possible care with the lowest radiation exposure. The department of Public Health has notified this Board that they do not recognize podiatry assistants as qualified individuals to take x-rays. As this board reviews current regulations 249 CMR 2.00 – 7.00, we expect that the qualifications of individuals who are operating equipment that produces ionizing radiation will be identified and the regulations will be revised. Many other states have established education and certification criteria for podiatric assistants who perform radiographic procedures. To name just a few, Wisconsin, Florida, Delaware, Maine and New Jersey currently have regulations specifically related to radiographic imaging in podiatric medicine.

Thank you for your time and consideration, I appreciate the opportunity to testify. The resources of the MSRT and ASRT are available to assist you in establishing qualifications and we look forward to working with you to be certain that this board accomplishes its' mission to promote the public health in podiatric medicine, and protect the safety of the citizens of the Commonwealth.

Sincerely,

Patricia Willett, BS, RT(R)(CT)

Past President and State Delegate, Massachusetts Society of Radiologic Technologists

ASRT Committee on R.T. Advocacy Region 9 Sub-Committee Member

cc

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