Massachusetts Society of Radiologic Technologists
P.O. Box 2821
Duxbury, MA 02331-2821
Phone: 781.422.3962

info@msrt-ma.org
www.msrt-ma.org

November 30, 2016

This testimony is submitted by the Massachusetts Society of Radiologic Technologists (MSRT) on behalf of its' membership. The MSRT appreciates the opportunity to provide comment on the proposed revisions to 105 CMR 127.000.

We have carefully reviewed the proposed revision and suggest that Massachusetts has an opportunity to take the lead in revising this regulation to surpass the federal minimum requirements and reflect the current standards of practice in mammography by requiring that all facilities utilize digital image acquisition for all mammography procedures. Digital mammography is recognized as the gold standard of care, offering superior image quality and lower patient dose. Since there are currently no facilities in the state performing film screen mammography, no hardship would result with this change.

We suggest the following updates to the proposed revision to achieve this goal.

- **Revise 127.017: (B) to read:**

The image acquisition and image receptor systems and their individual components shall be specifically designed for digital mammography. Film-screen mammography is prohibited.

- **127.005 Definitions:**

  Add
  - **Digital Mammography** also called full-field digital mammography (FFDM), is a mammography system in which the x-ray film is replaced by electronics that convert x-rays into images of the breast.
  - ***Breast tomosynthesis*,** also called three-dimensional (3-D) mammography and digital breast tomosynthesis (DBT), is an advanced form of breast imaging where multiple images of the breast from different angles are captured and reconstructed ("synthesized") into a three-dimensional image set.

  Remove
  - **Xeromammography** should be removed from the definitions as this technique has not been utilized since the 1980's

  Revise
  - **Image receptor** means any device, ~~such as a fluorescent screen or radiographic film~~, which transforms incident x-ray photons into a visible image or into another form which can be made into a visible image by further transformation.

- **Optimization** means the initial selection of operating parameters and equipment set-up process within the mammography facility in which a balance between the minimum patient dose and the maximum diagnostic information is achieved. This process involves the selection and evaluation of all the equipment in the mammographic system through a joint undertaking by the Responsible Physician, the Medical Physicist, the Mammography Radiologic Technologist and the Interpreting Physician. Such equipment includes but is not limited to: ~~film, screens, cassettes~~, digital image receptors, image processing and image display systems, grids, kilovolt peak (kVp), milliamperage (mA), exposure time, and filtration, ~~processor, and view boxes~~.

- Throughout the document replace the term "film" as it refers to the recorded image with the term "image"

- Throughout the document remove reference to quality control testing related to film, screens, darkroom, view boxes and film density.

    - The removal of quality control testing requirements for these components can be replaced by revision to **127.019 (14)** to read:

"All mammography facilities shall follow the manufacturers recommendation for quality control of all components used for digital image acquisition, digital image processing and digital image display."

Typographical error:

127.016, and 127.019 (10) (e); **3mg** should be **3mGy** or 3 milliGray

Respectfully submitted by:

Darren Sack, BS, RT(R)
Chairman of the Board
188 Brook Street
Plympton, MA 02367
dsack@partners.org
Tel. (617) 459-3643

Patricia Willett BS, RT(R)(CT)
State Delegate,
Co Chair Governance Committee
2 Murray Court
Groveland, MA 01834
pwillett@necc.mass.edu
Tel. (978) 994-0501