



## Massachusetts Society of Radiologic Technologists

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*Testimony for Joint Committee on Consumer Protection & Professional Licensure  
On Behalf of the Massachusetts Society of Radiologic Technologists  
Licensing, Employment Regulation, and Secondary Metals and Dealings Hearing  
July 18, 2017*

Mr. Chairman and members of the Committee, My name is Patricia Willett. I am a radiologic technologist, certified by the American Registry of Radiologic Technologists and licensed to practice by the Commonwealth of Massachusetts. Thank you for this opportunity to contribute to this dialogue on sonography credentialing.

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 and radiation therapists 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.

The practice of sonography is performed by a segment of health care professionals responsible for the administration of high-frequency sound waves and other diagnostic techniques for diagnostic, therapeutic or research purposes. A sonographer performs sonographic procedures at the request of and for interpretation by a licensed independent practitioner. They use complex medical equipment to complete these procedures, however this technology is ineffective in the wrong hands. Any person who is performing medical imaging procedures must have adequate education and training to create optimal images. The quality of any medical imaging procedure is directly linked to the skill and competence of the person performing it. Individuals must have extensive education and training to perform the exam correctly. Unqualified personnel are a danger to patients. An improperly performed scan can

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lead to the need for repeat imaging, increased healthcare costs and even worse, can result in misdiagnosis.

The MSRT supports the intent of H.3545 but we respectfully recommend several revisions;

**Terminology:** We recommend removing “vascular technologist” in most places (except in the list of other titles sometimes used when referring to a sonographer). The United States Department of Labor considers the vascular technologist/vascular sonographer to be a subset or a specialty area within the diagnostic medical sonography profession. We have also suggested inclusion of “echocardiographer,” which is a term often used to refer to a cardiac sonographer. We also recommend removing “sinologist” – while “sonologist” is sometimes used to refer to physicians who perform or interpret sonography images, neither term is used to describe a diagnostic medical sonographer.

**Certification/Credentialing Organizations:** The American Registry of Radiologic Technologists (ARRT) is primarily a certification/credentialing organization for radiologic imaging and radiation therapy personnel, the organization has three sonography-related certification examinations and credentials (i.e., Sonography, Breast Sonography, and Vascular Sonography). Therefore, the ARRT should be included in the list of recognized sonography certification/credentialing organizations.

**Accredited Laboratories:** The MSRT recommends changes to the list of organizations that accredit sonography laboratories – the Intersocietal Accreditation Commission (IAC) is the entity that accredits both vascular and cardiac sonography laboratories. They are no longer referred to as the “Intersocietal Accreditation Commission for Vascular Laboratories” (IACVL) or “Intersocietal Accreditation Commission for Echocardiography Laboratories” (IACEL). We would also point out that the American College of Radiology does have an accreditation program for sonography laboratories. However, their standards for vascular sonography accreditation do not require certification for those who are performing vascular sonography examinations and would not fit well with the goal of this bill.

**Medical Purpose:** The MSRT suggests the addition of the term “for a medical purpose” – while this should be unnecessary as a result of the Federal Food and Drug Administration’s warning about “entertainment” (non-medical) ultrasounds, we continue to see a proliferation of fetal imaging businesses including some located in Massachusetts. Hopefully this is not occurring within the Medicaid program, but the addition of this language makes it clear that there must always be a medical purpose for the examination, not an entertainment purpose.

On behalf of the medical imaging professionals of the Commonwealth, thank you for this opportunity to address this legislation.

Respectfully,

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