



Massachusetts Society of Radiologic Technologists

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This testimony is submitted by the Massachusetts Society of Radiologic Technologists (MSRT) on behalf of its membership. The MSRT appreciates having had the opportunity to collaborate and consult with the staff of the Radiation Control Program and Department of Public Health in preparation of the proposed revisions to 105 CMR 125.000. We are in agreement with the intent of these revisions to address advances in the field of medical imaging and to reflect current practice standards that are not addressed in the current regulations. We have carefully reviewed the proposed revisions and have identified several items that require revision or clarification in the document that is currently posted for public comment.

We request the following substantive revisions:

125.003 Definitions.

Proposed:

Radiologic Technologist means the individual who practices radiologic technology in Radiography, Nuclear Medicine, Radiation Therapy, Mammography, Computed Tomography, Positron Emission Tomography, Single Photon Emission Computed Tomography, or any combination thereof.

Radiologist Assistant/Radiology Practitioner Assistant means those Radiologic Technologists who have successfully completed an educational program recognized by the Department for Radiologist Assistant/Radiology Practitioner Assistant and who may perform non-invasive and invasive radiology procedures using image guidance as appropriate and follows the Practice Standards for Medical Imaging and Radiation Therapy, Radiologist Assistant Practice Standards as published by the American Society of Radiologic Technologists and/or the Certification Board for Radiology Practitioner Assistants.

Recommended Revisions:

1. Remove "Single Photon Emission Computed Tomography" from definition of Radiologic Technologist.
2. Clarify title of Radiologist Assistants in the definition.
3. Add a definition for Advanced Practice Discipline.
4. Reference the most current version of practice standards.

Radiologic Technologist means the individual who practices radiologic technology in Radiography, Nuclear Medicine, Radiation Therapy, Mammography, Computed Tomography, Positron Emission Tomography, or any combination thereof.

Radiologist Assistant means those Radiologic Technologists who have successfully completed an educational program recognized by the Department for Radiologist Assistants or Radiology Practitioner Assistants and who may perform non-invasive and invasive radiology procedures using image guidance as appropriate and follows the most current version of Practice Standards for Medical Imaging and Radiation Therapy, Radiologist Assistant Practice Standards as published by the American Society of Radiologic Technologists.

Advanced Practice Discipline means the practice of medical imaging or radiation therapy by a Radiologic Technologist who is certified and licensed in Radiography or Nuclear Medicine or Radiation Therapy and who has received additional education, training and certification in Computed Tomography (CT) or Positron Emission Tomography (PET) or Radiologist Assistant or Nuclear Medicine Advance Associate in accordance with the most current version of the Practice Standards for the specific discipline as published by the American Society of Radiologic Technologists, the Society of Nuclear Medicine and Molecular Imaging, or equivalent publication approved by the Department.

Rationale for revisions:

1. The identification of Single Photon Emission Computed Tomography (SPECT) in is not needed in the definition of Radiologic Technologist. SPECT is currently identified in the practice standards for all Nuclear Medicine Technologists and separate licensing is not required.
2. The medical imaging community uses the term “Radiologist Assistant” to refer to advanced practice radiographers and recognizes ARRT registered radiologist assistants and CBRPA certified radiology practitioner assistants using this term. This change will allow the RCP to identify one license category that recognizes the qualifications of individuals who have acquired certification from either the ARRT or CPRPA and follow the practice standards for Radiologist Assistants published by the ASRT.
3. Advanced Practice Discipline is not currently defined.
4. Throughout the definitions all references to the practice standards should identify **the most current version** of these documents.

125.004: Radiologic Technologist Licensing Disciplines

Proposed:

- (A) The Department shall issue licenses to Radiologic Technologists in one or more of the following disciplines:
1. Radiography;
 2. Nuclear Medicine;
 3. Radiation Therapy;
 4. Mammography, which also requires a license in Radiography;
 5. Computed Tomography, which also requires a full license in Radiography, and/or Nuclear Medicine, and/or Radiation Therapy;

6. Radiologist Assistant/Radiology Practitioner Assistant, which also requires a full license in Radiography;
7. Positron Emission Tomography, which also requires a full license in Nuclear Medicine or Radiography;
8. Nuclear Medicine Advanced Associate, which also requires a full license in Nuclear Medicine.

Recommended Revisions:

A2: Identify that a NM license includes PET imaging

A6: Identify the license category as "Radiologist Assistant" as described in 125.003 Definitions

A7: Clarify that an additional license in PET is required **only** for individuals with a primary Radiography or Radiation Therapy license.

(A) The Department shall issue licenses to Radiologic Technologists in one or more of the following disciplines:

- 1. Radiography;*
- 2. Nuclear Medicine/PET;*
- 3. Radiation Therapy;*
- 4. Mammography which also requires a full license in Radiography;*
- 5. Computed Tomography, which also requires a full license in Radiography, or Nuclear Medicine, or Radiation Therapy;*
- 6. Radiologist Assistant which also requires a full license in Radiography;*
- 7. Positron Emission Tomography, which also requires a full license in Nuclear Medicine or Radiography or Radiation Therapy*
- 8. Nuclear Medicine Advanced Associate, which also requires a full license in Nuclear Medicine.*

Rationale for revisions:

A2: Positron Emission Tomography (PET) is currently identified in the practice standards for all Nuclear Medicine Technologists and separate licensing is not required for individuals who hold certification in Nuclear Medicine from the ARRT or NMTCB.

A7: Any individual whose primary certification is Radiography or Radiation Therapy must obtain PET certification through the NMTCB and an additional license in PET.

A6: The medical imaging community uses the term "Radiologist Assistant" to refer to advanced practice radiographers and recognizes ARRT registered radiologist assistants and CBRPA certified radiology practitioner assistants using this term. This will allow the RCP to identify one license category that recognizes the qualifications of individuals who have acquired certification from either the ARRT or CPRPA and follow the practice standards for Radiologist Assistants as published by the ASRT.

125.005: Application for License

Proposed:

- (A) To practice Radiologic Technology in the Commonwealth of Massachusetts, an individual must:
1. Be currently certified or registered by a Board recognized by the Department, as specified in 105 CMR 125.005 (C); and
 2. Obtain a Radiologic Technologist license from the Department, unless specifically authorized by the Department to practice without a license.
- (B) An applicant for a license shall submit to the Department by hand delivery or by mail:
1. *a completed application on a form provided by the Department;*
 2. *a copy of the current Board certification or registration; and*
 3. *the appropriate fee established by the Executive Office of Administration and Finance.*
- (C) The following national, or international, certifying boards are recognized by the Department:
- American Registry of Radiologic Technologists
 - American Society of Clinical Pathologists
 - Australian Institute of Radiography
 - British College of Radiographers
 - Canadian Association of Medical Radiologic Technologists
 - Certification Board for Radiology Practitioner Assistants
 - Nuclear Medicine Technologists Certification Board
 - or other such boards recognized by the Department.

Recommended Revisions:

- A1:** Change certified “or” registered to certified “and” registered,
A2: Remove the provision that the department can authorize an individual to practice without a license
C: Identify that the ACRT should review any additional certifying boards.

- (A) To practice Radiologic Technology in the Commonwealth of Massachusetts, an individual must:*
1. *be currently certified and registered by a Board recognized by the ACRT, as specified in 105 CMR 125.005 (C); and*
 2. *obtain a Radiologic Technologist license from the Department.*
- (B) An applicant for a license shall submit to the Department by hand delivery or by mail:*
1. *a completed application on a form provided by the Department;*
 2. *a copy of the current Board certification and registration; and*
 3. *the appropriate fee established by the Executive Office of Administration and Finance.*

(C) The following national, or international, certifying boards are recognized by the Department:

American Registry of Radiologic Technologists

American Society of Clinical Pathologists

Australian Institute of Radiography

British College of Radiographers

Canadian Association of Medical Radiologic Technologists

Certification Board for Radiology Practitioner Assistants

Nuclear Medicine Technologists Certification Board

--or other such boards deemed eligible by the ACRT and the department.

Rationale for revisions:

A1: In order to be “current” one must be “certified” (passed the examination) and “registered” (current on CE). This clarification will be consistent with the requirement for license renewal as stated in 125.010

A2: There should be no instance where the department authorizes any individual to practice without a license. Review and consideration of special circumstance that may result in the granting of a license to practice should be conducted by the **Advisory Commission on Radiologic Technologist Licensing** consistent with MGL 111 5L and not individual RCP staff members.

C: Review and consideration of recognition of additional certifying boards that may result in the granting of a license to practice should be conducted by the **Advisory Commission on Radiologic Technologist Licensing** consistent with MGL 111 5L and not individual RCP staff members.

125.006: Requirements for Licensure in an Advanced Practice Discipline

Proposed:

(A) To work in an advanced practice discipline, a radiologic technologist must obtain a license from the Department that authorizes the individual to work in the specified advanced practice discipline. To be licensed in Massachusetts in an advanced practice discipline, the applicant must:

- (1) Have a current Massachusetts Radiologic Technologist license;
- (2) Have successfully passed the ARRT or NMTCB exam in the advanced practice discipline; and
- (3) Submit to the Department documentation of certification or registration in the advanced practice discipline.

(B) Radiologic Technologist may work in the following advanced practice disciplines upon completion of the corresponding training and upon receiving a license from the Department to practice in that advanced practice discipline:

- (1) A Computed Tomography Technologist (CT Technologist) shall have passed the Computed Tomography examination administered by the ARRT.
- (2) A Mammography Radiologic Technologist (Mammographer) shall have passed the Mammography Technologist examination administered by the ARRT.
- (3) A Radiologist Assistant/Radiology Practitioner Assistant shall have passed the Radiology Assistant examination administered by the ARRT.
- (4) A Positron Emission Tomography (PET) Radiologic Technologist shall have passed the Positron Emission Tomography examination administered by the NMTCB.
- (5) A Nuclear Medicine Technologist shall have passed the Nuclear Medicine Advanced Associate examination administered by the NMTCB.

Recommended Revisions:

A2: Add the CBRPA examination for Radiologist Assistants

A3: Change certified “or” registered to certified “and” registered

B1: Add the NMTCB examination for certification in CT

B3: Add the CBRPA examination for Radiologist Assistants

B4: Clarification of PET exam requirement

B5: Correctly identify the advanced practice discipline of Nuclear Medicine Advanced Associate (NMAA) for Nuclear Medicine Technologists.

(A) To work in an advanced practice discipline, a radiologic technologist must obtain a license from the Department that authorizes the individual to work in the specified advanced practice discipline. To be licensed in Massachusetts in an advanced practice discipline, the applicant must:

- (1) Have a current Massachusetts Radiologic Technologist license;*
- (2) Have successfully passed the ARRT or NMTCB or CPRPA exam in the advanced practice discipline; and*
- (3) Submit to the Department documentation of certification and registration in the advanced practice discipline.*

(B) Radiologic Technologist may work in the following advanced practice disciplines upon completion of the corresponding training and upon receiving a license from the Department to practice in that advanced practice discipline:

- (1) A Computed Tomography Technologist (CT Technologist) shall have passed the Computed Tomography examination administered by the ARRT or the NMTCB.*
- (2) A Mammography Radiologic Technologist (Mammographer) shall have passed the Mammography Technologist examination administered by the ARRT.*
- (3) A Radiologist Assistant shall have passed the Radiology Assistant examination administered by the ARRT or radiology practitioner assistant examination administered by the CBRPA.*

- (4) *A Positron Emission Tomography (PET) Radiologic Technologist with a primary license in Radiography or Radiation Therapy shall have passed the Positron Emission Tomography examination administered by the NMTCB.*
- (5) *A Nuclear Medicine Advanced Associate shall have passed the Nuclear Medicine Advanced Associate examination administered by the NMTCB.*

Rationale for revisions:

A2: The CBRPA is identified in section 125.005 C but was omitted in this section

A3: In order to be “current” one must be “certified” (passed the examination) and “registered” (current on CE) This clarification will be consistent with the requirement for license renewal as stated in 125.010

B1: Advanced certification exams are available through the both ARRT and NMTCB

B3: The CBRPA is identified in section 125.005 C but was omitted in this section

B4: Positron Emission Tomography is currently identified in the practice standards for all Nuclear Medicine Technologists and separate licensing is not required for individuals who hold certification in Nuclear Medicine from the ARRT or NMTCB. Any individual whose primary certification is Radiography must obtain PET certification through the NMTCB and an additional license in PET.

B5: The advanced practice discipline of NMAA for Nuclear Medicine Technologists was incorrectly titled Nuclear Medicine Technologist

125.008: Temporary Licensing of Radiologic Technologists

Proposed:

(A) Minimum Licensure Application Requirements. An individual who does not meet the licensure requirements specified in 105 CMR 125.005, may apply for a temporary license to practice radiologic technology in Massachusetts for a period not to exceed one year,

- 1) the individual is at least 18 years of age; *and*,
- 2) the individual has either:
 - a) successfully completed all requirements of a JRCERT/JRCNMT accredited or equivalent program prior to application for examination and has provided proof of completion of said requirements to the Department; and
 - b) has been determined to be eligible for examination by the American Registry of Radiologic Technologists, Nuclear Medicine Technology Certification Board or other certifying agency recognized by the Department, as set forth in 105 CMR 125.005

Recommended Revision:

A2 a: Change JRCERT/JRCNMT to JRCERT ”or ”JRCNMT

(A) Minimum Licensure Application Requirements. An individual who does not meet the licensure requirements specified in 105 CMR 125.005, may apply for a temporary

license to practice radiologic technology in Massachusetts for a period not to exceed one year,

- 1) the individual is at least 18 years of age; and,*
- 2) the individual has either:*
 - a) successfully completed all requirements of a JRCERT or JRCNMT accredited or equivalent program prior to application for examination and has provided proof of completion of said requirements to the Department; and*
 - b) has been determined to be eligible for examination by the American Registry of Radiologic Technologists, Nuclear Medicine Technology Certification Board or other certifying agency recognized by the Department, as set forth in 105 CMR 125.005*

Rationale for revision:

A2a: The use of “/” in formal writing can be ambiguous and could lead to confusion.

125.009: Continuing Education

Proposed:

(A) Continuing Education Requirements:

- 1) Must be obtained through a provider approved by the Department. All licensees are required to obtain a minimum of 24 CEUs during each two-year license renewal cycle. Individuals licensed as a Radiologist Assistant or a Nuclear Medicine Advanced Associate are required to obtain a minimum of 50 CEUs during each two-year license renewal cycle.
- 2) For individuals licensed in one discipline:
 - (a) 10 CEUs must be in the discipline in which the individual is licensed;
 - (b) two CEUs must be in radiation safety; and
 - (c) the remaining 12 CEUs must be earned in topics directly related to health care practice, radiation safety, or their specialty.
- 3) For individuals licensed in two or more disciplines:
 - (a) four CEUs must be in each discipline in which the individual is licensed;
 - (b) two CEUs must be in radiation safety, and the remaining CEUs must be earned in topics directly related to health care practice, radiation safety, or their specialty.
- 4) For individuals licensed as Mammography Radiologic Technologists, 12 CEUs must be in Mammography, two- CEUs must be in radiation safety, four CEUs in Radiography, and the remaining CEUs must be in topics directly related to health care practice, radiation safety, Radiography or Mammography.
- 5) For individuals licensed as a Radiologist Assistant, 50 CEUs must be included in the ARRT’s Continuing Education Requirements, including two in radiation safety.
- 6) For individuals licensed as a Nuclear Medicine Advanced Associate, 50 CEUs must be included in the NMTCB’s Continuing Education Requirements, including two in radiation safety.

- (B) Each licensed Radiologic Technologist must maintain documentation of CEUs obtained for the current renewal cycle and previous renewal cycle at each workplace where employed as a Radiologic Technologist and shall make such records available to Department inspectors upon request. Acceptable evidence of CEUs includes certificates of attendance and/or certificates of completion of CEU activities from any approval agency recognized by the Department, as set forth in 105 CMR 125.005(C).
- (C) Six (6) CEUs will be awarded for a valid Advanced Cardiac Life Support (ACLS). Advanced level CPR certification is limited to the following: Advanced Cardiac Life Support (ACLS), Pediatric Advanced Level Support (PALS), Instructor or Instructor Trainer. Only one certification may be submitted during a licensing cycle. A copy of a valid certificate issued by the Red Cross, the American Heart Association, or the American Safety and Health Institute will be accepted. CEU credit is not available for basic CPR (BLS/BLS with AED, Healthcare Provider CPR).
- (D) A Radiologic Technologist who becomes certified by a certifying board recognized by the Department in 105 CMR 125.005(C) in the following disciplines during a renewal cycle will be credited with 24 CEUs in recognition of having obtained that certification. A notarized copy of the certificate must be submitted to the Department in order to receive the CEUs from the Department. Such disciplines include:
- Cardiac-Interventional Technology
 - Vascular-Interventional Technology
 - Mammography
 - Computed Tomography
 - Bone Densitometry
 - Nuclear Cardiology through the NMTCB
 - PET through the NMTCB
- (E) The licensing cycle for CEUs is defined by the Radiologic Technologist's birth month. CEU requirements begins on the first day of the individual's birth month, in the year the license is renewed, through the last day of the month prior to the individual's birth month, 24 months later.
- (F) Probation Status:
- 1) A Radiologic Technologist who fails to meet the CEU requirements during a licensing cycle will be placed on probation. In order to be removed from probation the technologist must obtain, within three months from the expiration date of the license, the number of CEUs lacking from the CEUs needed and any penalty CEUs assessed against the licensee.
 - 2) The penalty CEUs will be equal to the number of CEUs that were lacking in the licensing cycle. The CEUs submitted to satisfy the probation

requirements cannot be used to fulfill the current licensing cycle. In addition, the technologist shall be required to obtain the necessary 24 CEUs by the end of the licensing cycle to remain in compliance with 105 CMR 125.009(A) (1).

- 3) Licensees on probation must comply with these requirements within three months of being put on probation or will be subject to enforcement action in accordance with the provisions of 105 CMR 125.000. Radiologic Technologists who are on CEU Probation will have “CEU Probation” indicated on their license. Once the CEU requirements are satisfied, “CEU Probation” will be removed from the license.

Recommended Revisions:

A1: Clarify that review of CEU providers will be conducted by the department in consultation with the ACRT as listed in section **A1a** below

C: Remove instructor and instructor trainer

D: Remove section **(D)** recognizing advanced certification examinations as proof of CEU’s, and re-letter the remaining sections

(A) Continuing Education Requirements:

1) Must be obtained through a provider approved by the ACRT and the Department. All licensees are required to obtain a minimum of 24 CEUs during each two-year license renewal cycle. Individuals licensed as a Radiologist Assistant or a Nuclear Medicine Advanced Associate are required to obtain a minimum of 50 CEUs during each two-year license renewal cycle.

a. CEU approval agencies recognized by the ACRT and the Department include:

- American College of Radiology (ACR)*
- American Healthcare Radiology Administrators (AHRA)*
- American Institute of Ultrasound in Medicine (AIUM)*
- American Roentgen Ray Society (ARRS)*
- American Society of Nuclear Cardiology (ASNC)*
- American Society of Radiologic Technologists (ASRT)*
- Association of Vascular and Interventional Radiographers (AVIR)*
- Canadian Association of Medical Radiation Technologist (CAMRT)*
- Massachusetts Society of Radiologic Technologists (MSRT)*
- Medical Dosimetrist Certification Board (MDCB)*
- Radiological Society of North America (RSNA)*
- Society of Diagnostic Medical Sonography (SDMS)*
- Society of Nuclear Medicine and Molecular Imaging (SNMMI)*
- Society of Interventional Radiology (SIR)*
- Society of Vascular Technology (SVT)*
- Other agencies recognized by ACRT and the department*

- 2) *For individuals licensed in one discipline:*
 - a) 10 CEUs must be in the discipline in which the individual is licensed;
 - b) 2 CEUs must be in radiation safety; and
 - c) the remaining 12 CEUs must be earned in topics directly related to health care practice, radiation safety, or their specialty.
 - 3) *For individuals licensed in two or more disciplines:-*
 - a) 4 CEUs must be in each discipline in which the individual is licensed;
 - b) 2 CEUs must be in radiation safety, and the remaining CEUs must be earned in topics directly related to health care practice, radiation safety, or their specialty.
 - 4) *For individuals licensed as Mammography Radiologic Technologists, 12 CEUs must be in Mammography, two- CEUs must be in radiation safety, four CEUs in Radiography, and the remaining CEUs must be in topics directly related to health care practice, radiation safety, Radiography or Mammography.*
 - 5) *For individuals licensed as a Radiologist Assistant, 50 CEUs must be included in the ARRT's Continuing Education Requirements, including two in radiation safety.*
 - 6) *For individuals licensed as a Nuclear Medicine Advanced Associate, 50 CEUs must be included in the NMTCB's Continuing Education Requirements, including two in radiation safety.*
- (B) *Each licensed Radiologic Technologist must maintain documentation of CEUs obtained for the current renewal cycle and previous renewal cycle at each workplace where employed as a Radiologic Technologist and shall make such records available to Department inspectors upon request. Acceptable evidence of CEUs includes certificates of attendance and/or certificates of completion of CEU activities from any approval agency recognized by the Department, as set forth in 105 CMR 125.005(C).*
- (C) *6 CEUs will be awarded for a valid Advanced Cardiac Life Support (ACLS). Advanced level CPR certification is limited to the following: Advanced Cardiac Life Support (ACLS), Pediatric Advanced Level Support (PALS). Only one certification may be submitted during a licensing cycle. A copy of a valid certificate issued by the Red Cross, the American Heart Association, or the American Safety and Health Institute will be accepted. CEU credit is not available for basic CPR (BLS/BLS with AED, Healthcare Provider CPR).*
- (D) *The licensing cycle for CEUs is defined by the Radiologic Technologist's birth month. CEU requirements begins on the first day of the individual's birth month, in the year the license is renewed, through the last day of the month prior to the individual's birth month, 24 months later.*
- (E) *Probation Status:*

- 1) *A Radiologic Technologist who fails to meet the CEU requirements during a licensing cycle will be placed on probation. In order to be removed from probation the technologist must obtain, within three months from the expiration date of the license, the number of CEUs lacking from the CEUs needed and any penalty CEUs assessed against the licensee.*
- 2) *The penalty CEUs will be equal to the number of CEUs that were lacking in the licensing cycle. The CEUs submitted to satisfy the probation requirements cannot be used to fulfill the current licensing cycle. In addition, the technologist shall be required to obtain the necessary 24 CEUs by the end of the licensing cycle to remain in compliance with 105 CMR 125.009(A) (1).*
- 3) *Licensees on probation must comply with these requirements within three months of being put on probation or will be subject to enforcement action in accordance with the provisions of 105 CMR 125.000. Radiologic Technologists who are on CEU Probation will have "CEU Probation" indicated on their license. Once the CEU requirements are satisfied, "CEU Probation" will be removed from the license.*

Rationale for revisions:

A1a: The list of approved CEU providers was reviewed by the RCP and MSRT and should be included in the regulations. Not all CEU providers meet the standards of the profession and confusion will result if the approved providers are not identified. Recognition of approval agencies should occur in consultation with the ACRT, not solely by individual staff members of the department.

C: CPR Instructor or Instructor training is not required for practice and should not be included to meet the required CEU's

D: Since 2013 by policy, RCP has accepted successful completion of an advanced certification examinations to meet CEU requirements. Since the time of review of these regulations, the ARRT has revised their policy regarding accepting the examination to meet CEU requirements and effective 2018 this practice will be discontinued by the ARRT. To avoid confusion and a discrepancy in CEU requirements we recommend that the RCP also suspend this practice and remove this from the regulations.

125.013: Student Clinical Education

Proposed:

- A) Any student enrolled in approved/accredited education programs in Radiography, Nuclear Medicine, Radiation Therapy, Mammography, PET, or CT is permitted to engage in those clinical activities which constitute the Clinical Education component of the program's approved curriculum, so long as such activities occur:

- 1) Under appropriate levels of supervision as stipulated by program requirements;
 - 2) Only while the student is enrolled in the program; and,
 - 3) Only during and as an integral part of the regularly scheduled clinical education activities.
- B) If for any reason a student must repeat any radiation procedure/exposure, a licensed Radiologic Technologist must directly supervise all activities associated with the repeat radiation procedure/exposure. For the requirements of 105 CMR 125.014, "directly supervise" means that the licensed Radiologic Technologist is present with the student, in the room, overseeing all activities associated with the repeat radiation procedure/exposure.

Recommended Revisions:

A: Replace "approved/accredited education programs" with and approved "and/or" accredited education programs

B: Replace radiation procedure/exposure with radiation procedure "or" exposure.

A) Any student enrolled in approved and/or accredited education programs in Radiography, Nuclear Medicine, Radiation Therapy, Mammography, PET, or CT is permitted to engage in those clinical activities which constitute the Clinical Education component of the program's approved curriculum, so long as such activities occur:

- 1) Under appropriate levels of supervision as stipulated by program requirements;*
- 2) Only while the student is enrolled in the program; and,*
- 3) Only during and as an integral part of the regularly scheduled clinical education activities.*

B) If for any reason a student must repeat any radiation procedure or exposure a licensed Radiologic Technologist must directly supervise all activities associated with the repeat radiation procedure or exposure. For the requirements of 105 CMR 125.014, "directly supervise" means that the licensed Radiologic Technologist is present with the student, in the room, overseeing all activities associated with the repeat radiation procedure or exposure.

Rationale for revisions:

A: Clarification to avoid any ambiguity in interpretation; Specific accreditation is not currently available through the JRCERT or JRCNMT for CT, Mammography or PET.

B: A radiation procedure often requires multiple exposures and direct supervision is required for each repeat exposure to radiation.

125.024: Waiver

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Proposed:

The Department may waive the application of any provision of 105 CMR 125.000 with respect to a particular case when in its opinion the enforcement thereof would do manifest injustice, provided that:

- (A) The party requesting a waiver shall submit written documentation supporting its request; and
- (B) The decision of the Department to grant a waiver shall not conflict with the purpose of 105 CMR 125.000 and shall not pose a risk to public health or safety.

The MSRT recommends removal of 125.024

Rationale for revision:

- The inclusion of such a general waiver of the provisions of DPH regulations does not appear to be consistently found in other existing DPH regulations.
- This broad statement leaves the Radiologic Technologist licensing open to encroachment by other healthcare professionals or other individuals who are not educationally prepared and clinically competent to administer ionizing radiation in the practice of Radiologic Technology.
- If a waiver clause must be included, any waiver of the provisions of 105 CMR 125.000 should be reviewed and approved by the department **and** the ACRT

Typographical error:

125.010: License Renewal

(F)

(2) When renewal is sought more than six months following the expiration of a license, the applicant must submit evidence of having obtained 24 CEUs in accordance with 105 CMR 125.009(A)(1) during the previous renewal cycle, as well as one additional CEU per month following the expiration of the license, and a valid **AART** or NMTCB card.

Revision: ARRT

General Recommended Edits:

- Throughout the document capitalize the title “Radiologic Technologist”
- Throughout the document there are multiple instances of “and/or” and “he/she”. The use of “/” can in some instances lead to confusion, it may be better to use the appropriate conjunction.

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