I am a Massachusetts radiologic technologist specializing in (insert radiography, radiation therapy, NMT) and a member of the Massachusetts Society of Radiologic Technologists. The MSRT is a nonprofit professional organization that serves as the voice for more than 8,000 licensed radiologic technologists and radiation therapists in Massachusetts. MSRT is a state affiliate of the American Society of Radiologic Technologists with a membership of more than 153,000 technologists nationwide.

I am contacting you regarding an issue that is important to all Massachusetts patients. Medical imaging plays a vital role in diagnosing disease and injury in patients; however, the benefit of imaging examinations also comes with risk. The majority of medical imaging involves the use of ionizing radiation, a known carcinogen that must be carefully and judiciously utilized in patient care. Imaging examinations performed by radiologic technologists who have concentrated education and clinical competence with a focus on radiation safety and the operation of equipment lead to fewer repeated exams and faster delivery of care to patients.

In the coming weeks the Massachusetts Legislature will be considering ways to reduce health care costs. I strongly urge you to ensure that any bills proposing the changes to reduce costs are clear in their definitions and intent. As a lawmaker, please ensure bills that would allow nurse practitioners and certified registered nurse anesthetists to supervise or perform "diagnostic tests" clearly state that performance or supervision of "diagnostic imaging tests" are not included in this definition.

The MSRT supports the position of the American College of Radiology, The Massachusetts Medical Society and the Massachusetts Radiologic Society related to "Team Based Health Care." MSRT supports the current bills that promote a physician-led patient care delivery system and strongly believe that nursing regulations as related to the use, and supervision of the use, of ionizing radiation in medicine should continue to be evaluated and promulgated jointly by the Board of Registration in Nursing and the Board of Registration in Medicine.

An expansion of the role of advanced practice registered nurses that includes the performance or supervision of any procedure utilizing radiation will not reduce healthcare costs, and may ultimately increase costs due to the inappropriate use of diagnostic imaging. Diagnostic medical imaging incorrectly performed could potentially threaten patients' health and safety and may require additional medical intervention, adding to health care costs paid by patients and insurers.

In 2016, the Veterans Administration (VA) completed an extensive evaluation of services and the role of nurse practitioners as health care providers. In their final report, the VA clearly stated that "All radiology studies are formally performed and read by individuals who are credentialed in radiology. This rulemaking will not change this practice. In order to avoid confusion, we are amending [proposed] &#167;17.415(d)(1)(i)(B) by removing 'performing, supervising, and interpreting imaging studies' and replacing it with 'Order laboratory and imaging studies and integrate the results into clinical decision making.'

I hope that the Massachusetts Legislature will recognize the unique qualifications and expertise of radiologists and radiologic technologists and that you will help ensure that high quality imaging procedures continue to be safely administered to all patients. Thank you for taking the time to consider my concerns, I am always available to answer any questions you may have.