



Massachusetts Society of Radiologic Technologist  
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February 29, 2024

Mr. Jack Priest  
Director Radiation Control Program  
Bureau of Climate and Environmental Health  
MA Department of Public Health  
529 Main St., Suite 1M2A  
Charlestown, MA 02129

Dear Director Priest,

The Massachusetts Society of Radiologic Technologist (MSRT) was recently made aware of a proposed licensing change which would allow medical assistants to perform imaging procedures, including the use of fluoroscopy.

The MSRT strongly opposes this proposed change to the current Massachusetts Radiologic Technologist Licensing regulations. The MSRT is concerned that allowing non-physician health care professionals, i.e. ... medical assistants, to use ionizing radiation without requiring the same educational requirements as a registered radiologic technologist, poses a safety risk to the patients of Massachusetts.

The MSRT is an affiliate of the American Society of Radiologic Technologists (ASRT). The ASRT is the leading professional organization for the medical imaging and radiation therapy community. Here in Massachusetts, the MSRT represents nearly 9,000 licensed imaging and therapy professionals, currently practicing in our state.

All registered radiologic technologists adhere to national standards set forth by the American Society of Radiologic Technologists (ASRT), the American Registry of Radiologic Technologists (ARRT) / Nuclear Medicine Technology Certification Board (NMTCB).

In accordance with M.G.L. c. 111, § 5L, **“no person shall perform the duties of a Radiologic Technologist without holding a current license from the department”**.

Section 5L also outlines educational requirements for obtaining a radiologic technologist license in the state of Massachusetts. Because of this statutory language, it is improper to grant medical assistants the ability to work as a radiologic technologist via regulatory change. We



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acknowledge that medical assistants are an important part of the healthcare system, but they do not meet the educational standard required for licensure.

Significant advances in technology have resulted in reduced patient radiation dose during radiographic procedures, opening the door to this change in clinical practice. The radiation protection methods implemented by registered and certified licensed radiologic technologists remain an essential component of high-quality and safe medical imaging procedures.

Additionally, MA regulation **105 CMR 120.405(K) Operator Qualifications**: A Registrant of a facility shall include ensuring that only the following healthcare providers shall be allowed to operate fluoroscopic x-ray systems:

- (a) licensed physicians who are board-certified in radiology
- (b) licensed physicians who are not board-certified in radiology provided that they have been trained in the following subjects:
  - 1. *Principles and operation of the fluoroscopic x-ray system*
  - 2. *Biological effects of x-ray*
  - 3. *Principles of radiation protection*
  - 4. *Fluoroscopic outputs*
  - 5. *High level control options*
  - 6. *Dose reduction techniques for fluoroscopic x-ray systems*
  - 7. *Application requirements of 105 CMR 120.000*
- (c) radiologic technologists who are licensed in accordance with 105 CMR 125.000 and have been trained in the safe use of fluoroscopic x-ray systems
- (d) physician assistants who are licensed in accordance with M.G.L. c. 112, § 9I, and 263 CMR 3.00: Registration of Individual Physician Assistants, and who meet the requirements of 105 CMR 120.405(K)(2)

Furthermore, the American College of Radiology (ACR) and American Association of Physicists in Medicine (AAPM) Technical Standard for Management of the Use of Radiation in Fluoroscopy Procedures states “Radiologic Technologists must have received formal training in radiation management. Those assisting with fluoroscopy for FGI procedures should undergo a



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formal authorization process, administered by the facility. Additionally, those assisting with fluoroscopy should be thoroughly trained in radiography of the organ systems involved in a fluoroscopic procedure. Certification by the ARRT or unrestricted state license is required for radiologic technologists”.

The MSRT opposes the utilization of unlicensed individuals to perform medical imaging procedures, including fluoroscopy.

The MSRT recognizes the Massachusetts Radiation Control Program for their attentiveness to providing patients’ access to safe and quality health care services that meet national education and clinical standards. We strongly recommend that only those licensed health care professionals, utilizing ionizing radiation, be allowed to perform medical imaging procedures. This will ensure patient safety and high-quality imaging is maintained.

If you have any additional questions, please do not hesitate to contact me at 617-538-8516 or [info@MSRT-MA.org](mailto:info@MSRT-MA.org).

Sincerely,

Erin M. Peterson BS R.T. (R)(ARRT)

President

Massachusetts Society of Radiologic Technologists