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To: Commissioner Robert Goldstein and Members of the Public Health Council

From: Nalina Narain, Bureau Director, Bureau of Environmental Health

Date: February 12, 2025

RE: Informational Briefing on Proposed Amendments to 105 CMR 125.000, *Licensing of Radiologic Technologists*

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## **I. Introduction**

The purpose of this memorandum is to provide the Public Health Council (PHC) with information about proposed amendments to 105 CMR 125.000, *Licensing of Radiologic Technologists*. This regulation sets out the requirements to obtain and maintain a license to practice as a Radiologic Technologist (RT) in the Commonwealth of Massachusetts. These regulations were last updated in February 2017.

The Massachusetts healthcare system continues to face severe capacity challenges, including a high volume of emergency department (ED) visits, particularly during the summer months. To address this, the Executive Office of Health and Human Services has advanced policy changes to promote the redirection of patients not needing emergency-level care to urgent care providers.

The Department of Public Health's Bureau of Climate and Environmental Health is amending these regulations to authorize a new "Limited Scope of Practice in Radiography" license. This update is designed to address the ongoing concerns listed above by expanding capacity in urgent care centers, reducing pressure on emergency departments for non-emergency care, and fostering career advancement opportunities for radiologic technologists. The new license type will be subject to the same licensing fees as all other existing radiologic technologist licensing categories.

The growing demand for radiologic technologists is driven by several factors, including technological advancements that have expanded medical imaging options, requiring more specialized expertise. Additionally, the shift from hospital-based to community-based healthcare models, such as satellite clinics and smaller hospitals, has spread radiologic technologists thin

across multiple locations, reducing their hours at each. Moreover, patients are becoming more informed and expect advanced analytics in routine care, further increasing pressure on the healthcare system to meet these rising demands.

The U.S. Bureau of Labor Statistics forecasts a 6% employment growth for radiologic technologists from 2022 to 2032, with an average of 15,700 annual openings nationwide. Many of these openings will result from workers leaving the field or switching careers. This could strain the capacity of existing radiologic technologists as some pursue more specialized, higher-paying positions. The creation of a Limited Scope of Practice in Radiography license aims to alleviate these pressures and provide greater career advancement opportunities within the field.

To address these challenges, the Department recommends amendments to 105 CMR 125.000, outlined below. In developing these proposed amendments, the Department consulted with the American Registry of Radiologic Technologists (ARRT), which sets national standards, the American Society of Radiological Technologists (ASRT), the Massachusetts Society of Radiologic Technologists (MSRT), and referred to similar models established by New Hampshire and Texas.

## **II. Proposed Amendments**

A new Limited Scope of Practice in Radiography license will allow more individuals to qualify as x-ray machine operators in limited capacities, upon meeting new licensing requirements proposed in these amendments.

*There are three major categories of proposed amendments:*

1. **Create Limited Scope of Practice in Radiography licensing disciplines (105 CMR 125.003 and .004):** Creates a new definition and licensing discipline referred to as “Limited Scope Practice in Radiography.”
2. **Add qualifications and an application for Radiologic Technologist License (105 CMR 125.005):** Outlines the following requirements to qualify for a license as a Limited Scope of Practice in Radiography:
  1. Be at least 18 years of age; and
  2. Have obtained a high school diploma or passed an approved equivalency test; and
  3. Successfully completed a course of study in limited scope radiologic technology approved by the Department; and
  4. Successfully passed the Limited Scope of Practice in Radiography Examination, administered by AART on behalf of the Department, in up to two of the following procedure specialties: chest, extremities, skull/sinuses, spine, or podiatric radiography.

3. **Clarify continuing education requirements (105 CMR 125.009):** Changes were made to reorganize this section to improve understanding and clarify language.

Language was also added to outline CEU requirements for individuals with a Limited Scope of Practice in Radiography license. CEUs must be obtained through a provider approved by the Department. All Limited Scope licensees are required to obtain a minimum of 24 CEUs during each two-year license renewal cycle in the following areas:

1. Ten CEUs must be in the discipline in which the individual is licensed,
2. Two CEUs must be in radiation safety;
3. The remaining CEUs must be earned in topics directly related to health care practice, radiation safety, or their specialty.

*Miscellaneous and Technical Amendments:*

Other proposed amendments improve readability and clarify existing regulatory requirements. The redline of the regulation attached to this memo also includes detailed comments throughout, explaining these proposed amendments.

**III. Next Steps**

The Department intends to conduct a public hearing and comment period and then return to the PHC to report on testimony and any recommended changes to the proposed amendments.

The proposed amendments to 105 CMR 125.000 are attached to this memorandum.