From:

Massachusetts Society of Radiologic Technologists
info@msrt-ma.org
March 25, 2025

Subject: Public Hearing on Proposed Amendments to 105 CMR 125.000

Dear Members of the Department of Public Health,

On behalf of the **Massachusetts Society of Radiologic Technologists (MSRT)**, we appreciate the opportunity to provide comments on the proposed revision to **105 CMR 125.000**, which introduces a **Limited Scope of Practice** in medical imaging.

The MSRT is a nonprofit professional organization representing approximately 8,000 certified technologists across Massachusetts. Our mission is to uphold high ethical and educational standards, ensuring that all citizens receive quality medical imaging and radiation therapy services from highly qualified and competent Radiologic Technologists.

We understand that the intent of this initiative is to decrease barriers to entry into the field while maintaining standards for patient safety and quality care. However, we have significant concerns regarding the implementation of limited scope licensing for the following reasons:

Lack of a Seamless Pathway for LXMO to Become Certified Radiologic Technologists (RTs)

The Joint Review Committee on Education in Radiologic Technology (JRCERT) accreditation standards require all students to complete a full radiologic technology program. Advanced placement is not allowed, meaning there is no direct pathway for Limited X-Ray Machine Operator (LXMO) licensees to become fully credentialed Radiologic Technologists.

Limited Workforce Impact Based on Other States' Experiences

A survey conducted by the MSRT of other states allowing limited scope practice found that, on average, limited scope licenses constitute only about 5% of the total certified technologists in radiography. These states continue to face staffing shortages, indicating that adding a LXMO license is unlikely to significantly impact workforce availability.

Questionable Financial Benefit of Hiring LXMOs

Newly graduated Radiologic Technologists in Massachusetts currently earn a starting wage of $30–$36 per hour. While LXMOs may be hired at a lower pay rate, their restricted scope of practice limits their ability to perform a wide range of procedures, making their overall benefit to healthcare facilities questionable.

Limitations in Scope of Practice

LXMOs are not permitted to perform key imaging procedures, including:

- Fluoroscopy
- Procedures utilizing contrast media
- Mobile and remote imaging

Furthermore, certification in mammography, Computed Tomography (CT), and other advanced imaging modalities require completion of a full radiologic technology program and certification in Radiography, Nuclear Medicine, or Radiation Therapy, which LXMOs do not meet.

Negative Impact on Hospital-Based RT Positions and Clinical Training

Integrating LXMOs into hospital settings could diminish employment opportunities for fully credentialed Radiologic Technologists (RTs) and further restrict clinical placement opportunities for radiologic technology students. Accredited RT programs already face challenges in securing sufficient clinical training sites due to strict accreditation requirements for staffing and student supervision. An increased reliance on LXMOs may reduce available training slots, potentially leading to program closures. This, in turn, would worsen the existing RT shortage by limiting the pipeline of newly certified technologists entering the workforce.

Importance of Job Titles in Professional Identity and Career Progression

Job titles are important because they provide a clear and concise way to describe an individual's role, responsibilities, and level within an organization. They help establish professional identity, set expectations for job duties, and facilitate communication both internally and externally. Job titles also play a key role in career progression, salary benchmarking, and recruiting efforts by ensuring consistency in job classifications across industries. Additionally, they contribute to workplace hierarchy, helping employees and stakeholders understand reporting structures and areas of expertise. Individuals licensed to perform in a limited capacity of medical imaging should not be referred to as Radiologic Technologists. Doing so can lead to confusion and ambiguity. A **Radiologic Technologist** is certified and registered with the American Registry of Radiologic Technologists (ARRT)or Nuclear Medicine Technology Certification Board (NMTCB). We request that the title of **Limited X-ray Machine Operator (LXMO),** which is consistent with the ASRT Practice Standards for Medical Imaging and Radiation Therapy be used.

Regulatory Oversight and Advisory Commission on Radiologic Technologist Licensing

The proposed revision was developed without consultation with the Advisory Commission on Radiologic Technologist Licensing, as required by MGL111.5L, which has not been convened since 2018. A collaborative approach is essential to ensuring that all perspectives are considered and that any updates align with the highest standards of radiologic practice. The MSRT strongly urges the Department of Public Health to reconvene the Advisory Commission before moving forward with these amendments.

MSRT's Recommendations

Should the Department of Public Health decide to proceed with implementing limited scope licensing, we believe significant revisions are necessary to ensure that scope of practice and educational requirements are clearly defined while maintaining high standards for patient care and safety. The MSRT has compiled a document with detailed suggested edits to the proposed revision. These updates emphasize the importance of maintaining educational expectations and reinforcing the value of the current credentials held by radiologic technologists.

The MSRT remains committed to working collaboratively with the Radiation Control Program to develop solutions that enhance workforce capacity without compromising patient safety or the integrity of the radiologic technology profession. We would welcome the opportunity to join a working group to address this or any related projects.

Thank you for your time and consideration of our concerns. We look forward to further discussion on this important matter.

Erin M Peterson, BS, RT(R) (ARRT)

Chair of the Board
Massachusetts Society of Radiologic Technologists

Item Needing Revision to Proposed Amendment	Rationale
LICENSING OF RADIOLOGIC TECHNOLOGISTS AND LIMITED X-RAY MACHINE OPERATORS	1) Job titles are important because they provide a clear and concise way to describe an individual's role, responsibilities, and level within an organization. They help establish professional identity, set expectations for job duties, and facilitate communication both internally and externally. Job titles also play a key role in career progression, salary benchmarking, and recruiting efforts by ensuring consistency in job classifications across industries. Additionally, they contribute to workplace hierarchy, helping employees and stakeholders understand reporting structures and areas of expertise. 2) Referring to an individual licensed to create medical images of **limited** anatomic areas can lead to confusion and ambiguity 3) A **Radiologic Technologist** is certified and registered with the American Registry of Radiologic Technologists (ARRT)or Nuclear Medicine Technology Certification Board (NMTCB) **Radiologic Technologist areas of certification and registration include** • Bone Densitometry (BD) • Breast Sonography (BS) • Cardiac Interventional Radiography (CI) • Computed Tomography (CT) • Magnetic Resonance Imaging (MR) • Mammography (M) • Nuclear Medicine Technology (N) • Nuclear Medicine Advanced Associate (NMAA) • Nuclear Cardiology Technologist (NCT) • Positron Emission Technology Certification (PET) • Radiation Therapy (T)

	• Radiography (R) • Registered Radiologist Assistant (R.R.A.) • Radiology Practitioner Assistant (RPA) • Sonography (S) • Vascular Interventional Radiography (VI) • Vascular Sonography (VS) 4) An individual licensed by the state to practice in limited aspects of medical imaging is not educationally prepared or clinically competent to meet the qualifications to become a certified Radiologic Technologist.
Section Title **125.005: Qualifications and** Application for Radiologic Technologist and Limited X-ray Machine Operator (LXMO) License	1) Job titles are important
125.001: Scope and Purpose 105 CMR 125.000 sets out the requirements to obtain and maintain a license to practice as a Radiologic Technologist or Limited X-ray Machine Operator in the Commonwealth of Massachusetts. The purpose of 105 CMR 125.000 is to establish minimum standards necessary for an individual to become licensed as a Radiologic Technologist or Limited X-ray Machine Operator and to specify enforcement procedures for violations of 105 CMR 125.000.	1) Job titles are important
125.002: General Provisions (D) ~~Standards of Ethics.~~ Radiologic Technologists and LXMO shall abide by the Standard of Ethics set forth by each corresponding certification agency and/or professional society.	1) There is no certification agency for limited x-ray machine operators. Practice Standards for Limited X-Ray Machine Operators have been established by the American Society of Radiologic Technologists.
125.002: General Provisions move this back to where it came from (E) A Radiologic~~al~~ Technologist, including those licensed in an advanced practice discipline, ~~shall work under the supervision of a radiologist and~~ may not interpret images, make diagnoses, or prescribe medications or therapies.	1) "al" suffix is unnecessary and inconsistent with terminology throughout the document 2) There are numerous scenarios where a radiologist is not available, and the Radiologic Technologist works independently, to carry out the medical imaging orders of a licensed health care provider.

125.003: Definitions ~~**Limited Scope of Practice in Radiography**~~ **Limited X-ray Machine Operator** ~~**means the individual who practices radiologic technology in up to two of the following procedure categories: chest, extremities, skull/sinuses, spine, or podiatric radiography**~~ **Limited X-Ray Machine Operator (LXMO) means** the individual who assists a licensed practitioner or Radiologic Technologist during static radiographic procedures by performing diagnostic radiographic procedures, as prescribed by a licensed practitioner, of a specific area of anatomical interest based on limited education, training and licensure/certification within the individual's scope of practice. **Fluoroscopy, Contrast Media, Mobile and Remote Imaging are prohibited.**	(1) Definition is consistent with the ASRT Practice Standards for Medical Imaging and Radiation Therapy (2) Fluoroscopy, Contrast Media, Mobile and Remote Imaging are **not** included in the ASRT curriculum or ARRT examination for limited scope practice (3) How will the limited scope of practice be monitored by the department (4) Penalty for non-compliance should be identified
125.003: Definitions Radiologic Technologist means the individual who practices radiologic technology in Radiography, Nuclear Medicine, Radiation Therapy, Mammography, Computed Tomography, Positron Emission Tomography, ~~**Limited Scope of Practice in Radiography**~~, or any combination thereof.	(1) An individual licensed by the state to practice in limited aspects of medical imaging is not educationally prepared or clinically competent to meet the qualifications to become a certified Radiologic Technologist.
125.003: Definitions Computed Tomography (CT) means the practice and performance of those activities, actions, duties, and responsibilities contained within and defined by the *Practice Standards for Medical Imaging and Radiation Therapy, Computed Tomography Practice Standards*, as published by the American Society of Radiologic~~al~~ Technologists or equivalent publication approved by the Department. For the purposes of 105 CMR 125.000, licensing in CT refers to Diagnostic CT, and excludes CT exams performed for therapeutic radiation treatment planning of delivery (CT simulators), or for calculating attenuation coefficients for Nuclear Medicine and PET studies (PET-CT and SPECT-CT), or dental cone beam CT, or Cone Beam CT utilized for external beam radiation therapy planning.	1) American Society of Radiologic Technologists

125.003: Definitions Mammography means the practice and performance of those activities, actions, duties, and responsibilities contained within the *Practice Standards of Medical Imaging and Radiation Therapy, Mammography Practice Standards*, as published by the American Society of Radiologic~~al~~ Technologist~~s~~ or equivalent publication approved by the Department	1) American Society of Radiologic Technologists
125.004: ~~Radiologic Technologist~~ Licensing Disciplines ~~(A)~~ The Department shall issue licenses ~~to Radiologic Technologists~~ in one or more of the following disciplines. **(A) Limited ~~Scope of Practice in Radiography~~ X-Ray Machine Operators** (~~1~~**B**) Radiography (~~2~~**C**) Nuclear Medicine (~~3~~**D**) Radiation Therapy (~~4~~**E**) Mammography, which also requires a **full** license in Radiography (~~5~~**F**) Computed Tomography, which also requires a full license in Radiography, and/or Nuclear Medicine, and/or Radiation Therapy (~~6~~**G**) Radiologist Assistant which also requires a full license in Radiography or Radiation Therapy (~~7~~**H**) Positron Emission Tomography, which also requires a full license in Nuclear Medicine, Radiography or Radiation Therapy (~~8~~**I**) Nuclear Medicine Advanced Associate, which also requires a full license in Nuclear Medicine	1) Titles are important
125.005: Qualifications and Application for Radiologic Technologist or Limited X-ray Machine Operator License	1) Titles are important
(A) An applicant for licensure as a Radiologic Technologist shall at the time of application: **(1) Be at least 18 years of age; and** **(2) Have successfully completed a four-year course of study in a secondary school approved in Massachusetts, or hold a high school diploma from another state, or have passed an approved**	1) Separate criteria more clearly identify titles and scope of practice

equivalency test; and **(3) Have successfully completed a course of study as a Radiologic Technologist at an education program approved by the Department; and** **(4) Have successfully passed the certification examination for ~~full~~ Radiologic Technologist ~~or Limited Scope of Practice in Radiography~~ administered by ARRT, NMTCB or other national or international certifying board approved by the Department; and** **(5) ~~Except for Limited Scope of Practice in Radiography~~, have a valid certification or registration from ARRT or other national or international certifying board approved by the Department**	
ADD (B) **(B)** An applicant for licensure as a Limited X-Ray Machine Operator shall at the time of application: (1) Be at least 18 years of age; and (2) Have successfully completed a four-year course of study in a secondary school approved in Massachusetts, or hold a high school diploma from another state, or have passed an approved equivalency test; and **(3) Have successfully completed a course of study that adheres to the ASRT Limited X-Ray Machine Operator Curriculum and ARRT Limited Scope of Practice in Radiography Content Specifications at an education program approved by the Department; and** **(4) Have successfully demonstrated clinical competency under the supervision of a licensed Radiologic Technologist; and** (5) Have successfully passed the examination for Limited X-Ray Machine Operator offered by the department and administered by ARRT or other national or international certifying board approved by the Department; **a. The minimum passing score for the examination shall be 80%** **b. The applicant will have 3 attempts to achieve a passing score**	1. Separate criteria more clearly identify titles and scope of practice 2. It is imperative that the minimum standards for education and training be included in the regulations. 3. Radiologic Technology degree programs have external accreditation to ensure that minimum didactic and clinical standards of the profession are met. There is no external oversight or accreditation of limited scope training. 4. Does the RCP have adequate staffing and expertise to evaluate curriculum from training programs? Will an Advisory Committee be utilized and consulted for such a review? 5. Minimum passing score of 80% is consistent with NH regulations 6. Exam attempt limitation is consistent with ARRT requirements

125.005: Qualifications and Application for Radiologic Technologist License This section requires editing but should not be removed (C) ~~(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~~. ~~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.~~ (C) To practice as a Radiologic Technolog~~y~~ist 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. The following national or international certifying boards are recognized by the Department: American Registry of Radiologic Technologists (ARRT) ~~British College of Radiographers~~ Health and Care Professions Council (HCPC) Canadian Association of Medical ~~Radiologic~~ Radiation Technologists (CAMRT) Certification Board for Radiology Practitioner Assistants (CBRPA) Nuclear Medicine Technologists Certification Board (NMTCB) or other such boards recognized by the Department.	1) Identifying the three major national certification boards (ARRT, NMTCB and CBRPA) provides transparency and reference to the high standards of education and clinical competence expected by the department for licensure as a Radiologic Technologist in Massachusetts. 2) These three international certification boards are identified as meeting or exceeding the qualifications set by our national boards. a. Medical Radiation Practice Board of Australia (MRPBA) b. Health and Care Professions Council (HCPC) c. Canadian Association of Medical Radiation Technologists (CAMRT) Recognition of these international certifications that are not transferable to the U.S. national certification boards is an advantage to individuals educated and certified in these countries that is not be available in many other states.

ADD (D) **~~(C)~~ An applicant for a Limited ~~Scope of Practice in Radiography~~ X-ray Machine Operator license may apply to practice in up to two of the following procedure specialties: chest, extremities, skull/sinuses, spine, or podiatric radiography, by submitting appropriate course of study in these procedure specialties to the Department.** **Fluoroscopy, Contrast Media, Mobile and Remote Imaging are excluded.**	1) Fluoroscopy, Contrast Media, Mobile and Remote Imaging are not included in the ASRT Curriculum or ARRT examination content specifications
125.006: Requirements for Licensure in an Advanced Practice Discipline do not move ~~(D) A Radiologist Assistant shall work under the supervision of a radiologist and may not interpret images, make diagnoses, or prescribe medications or therapies.~~	1) This statement is specific to the Radiologist Assistant Scope of Practice and is a requirement of American College of Radiology Accreditation. Specific to RA required by ACR
125.008: Temporary Licensing of Radiologic Technologists **Add** **(B) Temporary Licenses will not be issued for Limited X-ray Machine Operators**	
125.009: Continuing Education (A) Continuing Education Requirements ~~(1)~~ CEUs must be obtained through a**n agency** ~~provider approved~~ **recognized** by the Department. **Except as otherwise provided in 105 CMR 125.009(A),** ~~A~~all licensees ~~are required to~~ **shall** obtain a minimum of 24 CEUs during each two-year license renewal cycle. **The following requirements apply to specific disciplines:** **(**~~2~~**1)** ~~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.~~ ~~**Limited Scope of Practice in Radiography**~~ **Limited X-ray Machine Operator** ~~**Individuals licensed as a Limited Scope of Practice in Radiography**~~ **Limited X-ray Machine Operator**	1) There is no "discipline" specific to limited practice 2) Will the department monitor CE content specific to license area (chest, extremity, skull etc.)

shall obtain the required 24 CEUs during each two-year license renewal cycle as follows: **(a) ten CEUs must be in the ~~discipline of Limited Scope of Practice in Radiography;~~** discipline in which the individual is licensed **and** **(b) two CEUs must be in radiation safety; and** **(c) the 12 remaining CEUs must be earned in topics directly related to health care practice, radiation safety/radiation protection, or their specialty.** **(2) Radiologic Technologist (Single Discipline)** ~~For i~~Individuals licensed in one discipline **shall obtain the required 24 CEUs during each two-year license renewal cycle as follows**: (a) ten CEUs must be in the discipline ~~in which the individual is licensed~~**of Radiologic Technology; and** (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**/radiation protection**, or their specialty. (3) **Radiologic Technologist (Multiple Discipline)** ~~For i~~Individuals licensed in ~~two or~~ more **than one** discipline~~s,~~ **shall obtain the required 24 CEUs during each two-year license renewal cycle as follows**: (a) four CEUs must be in each discipline in which the individual is licensed~~,~~**; and** (b) two CEUs must be in radiation safety**/radiation protection**~~,~~**; and** (c) the remaining CEUs must be earned in topics directly related to health care practice, radiation safety, or their specialty. (4) **Mammography Technologist** ~~For i~~Individuals licensed as **a** Mammography Radiologic Technologist **shall obtain the required 24 CEUs during each two-year license renewal cycle as follows~~,~~:** **(a)** 12 CEUs must be in Mammography**;~~,~~and** **(b)** two CEUs must be in radiation safety**;~~,~~and**	3) The term "**discipline of Radiologic Technology**" is too broad. The original wording "**in the discipline in which the individual is licensed**" or "**in the area in for which the individual is licensed**" better describes the intent of ensuring that the licensee remains current in their licensed area of practice.

(c) four CEUs **must be** in Radiography;~~,~~ and **(d)** the remaining **6** CEUs must be in topics directly related to healthcare practice, radiation safety, Radiography or Mammography. (5) **Radiologist Assistant** ~~For i~~ Individuals licensed as a Radiologist Assistant **shall obtain a minimum of 50 CEUs during each two-year license renewal cycle as follows:**~~.~~ (a) ~~50~~ **48** CEUs must be included in the ARRT's Continuing Education Requirements **and can include advanced level CPR certification specified in 105 CMR 125.009(C);**~~, including two~~ ~~in radiation safety~~ **and** **(b) two CEUs must be in** radiation safety**/radiation protection.** (6) **Nuclear Medicine Advanced Associate** ~~For i~~Individuals licensed as a Nuclear Medicine Advanced Associate~~,~~ **shall obtain a minimum of** 50 CEUs **during each two-year license renewal cycle as follows:** (a) ~~50~~ **48** CEUs must be included in the NMTCB's Continuing Education Requirements ~~including~~ ~~two in radiation safety~~~~,~~**; and** **(b)** two **CEUs must be** in radiation safety**/radiation protection.**	
125.009: Continuing Education **Should not be removed** ~~**(B) CEU approval agencies recognized by the Department will be listed on the Radiation Control Program website. include:**~~ ~~**American College of Radiology (ACR)**~~ ~~**American Association of Medical Dosimetrists (AAMD)**~~ ~~**Association for Medical Imaging Management (AHRA)**~~ ~~**American Institute of Ultrasound in Medicine (AIUM)**~~ ~~**American Society of Nuclear Cardiology (ASNC)**~~ ~~**American Society of Radiologic Technologists (ASRT)**~~ ~~**Association of Vascular and Interventional Radiographers (AVIR)**~~ ~~**Canadian Association of Medical Radiation Technologists (CAMRT)**~~ ~~**Massachusetts Society of Radiologic Technologists (MSRT)**~~ ~~**Medical Dosimetrist Certification Board (MDCB)**~~ ~~**Radiological Society of North America (RSNA)**~~	1) The list of CE approval agencies is current and valid. Identifying them in the regulations provides transparency of the standards established for continuing education for Radiologic Technologists.

~~Section for Magnetic Resonance Technologist of the International Society for Magnetic Resonance in Medicine (SMRT)~~ ~~Society of Diagnostic Medical Sonography (SDMS)~~ ~~Society of Nuclear Medicine and Molecular Imaging (S.N.M.MI)~~ ~~Society of Vascular Ultrasound (SVU)~~ ~~Other agencies recognized by the Department~~. **CEU approval agencies recognized by the Department will be listed on the Radiation Control Program website. include:** **American College of Radiology (ACR)** **American Association of Medical Dosimetrists (AAMD)** **Association for Medical Imaging Management (AHRA)** **American Institute of Ultrasound in Medicine (AIUM)** **American Society of Nuclear Cardiology (ASNC)** **American Society of Radiologic Technologists (ASRT)** **Association of Vascular and Interventional Radiographers (AVIR)** **Canadian Association of Medical Radiation Technologists (CAMRT)** **Massachusetts Society of Radiologic Technologists (MSRT)** **Medical Dosimetrist Certification Board (MDCB)** **Radiological Society of North America (RSNA)** **Section for Magnetic Resonance Technologist of the International Society for Magnetic Resonance in Medicine (SMRT)** **Society of Diagnostic Medical Sonography (SDMS)** **Society of Nuclear Medicine and Molecular Imaging (SNMMI)** **Society of Vascular Ultrasound (SVU)** **Other agencies recognized by the Department**	
(~~C~~**B**) C Each ~~licensed Radiologic Technologist~~ **licensee** 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~~**A**).	1) Each individual or Each licensee 2) An individual licensed by the state to practice in limited aspects of medical imaging do not meet the qualifications of a certified Radiologic Technologist.

(~~F~~D)Probation Status. **(1)** A ~~Radiologic Technologist~~licensee 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.	1) An individual licensed by the state to practice in limited aspects of medical imaging do not meet the qualifications of a certified Radiologic Technologist

125.010 License Renewal (A) To renew a ~~Radiologic Technologist~~ license, the licensee shall submit the following at least 21 calendar days before the current license's expiration date: (1) a renewal application; and (2) evidence of completion of ~~a minimum of 24~~ CEU~~s~~ **requirements as specified in 105 CMR 125.009(A); and** **(3) the renewal fee prescribed by the Executive Office for Administration and Finance, 801 CMR 4.02: Fees for Licenses, Permits, and Services to Be Charged by State Agencies~~.~~; and** **(4) except for ~~Limited Scope of Practice in Radiography~~ Limited X-ray Machine Operator, a valid copy of their ARRT or NMTCB certificate.**	
(~~D~~**C**)The ~~Agency~~ **Department** will not renew the license of a ~~Radiologic Technologist~~ any individual who is in violation of any provision of 105 CMR 125.000 at the time of renewal.	1) Titles are important