



February 24, 2025

Support for Proposed Amendments to 105 CMR 125.000, Licensing of Radiologic Technologists

The Urgent Care Association (UCA) serves as the national voice for Urgent Care centers and providers, advocating for accessible, high-quality healthcare solutions. Our mission is to equip Urgent Care operators and providers with the necessary tools and resources to enhance community healthcare delivery. As part of this commitment, **UCA strongly endorses the proposed amendments to 105 CMR 125.000, Licensing of Radiologic Technologists**, which aim to create a streamlined registration and licensing process for limited-scope radiographers (the "Amendments").

A critical nationwide shortage of radiologic technologists (RTs) is increasingly burdening Urgent Care centers and other healthcare providers. According to the American Society of Radiologic Technologists (ASRT), the vacancy rate for radiographers surged to 18.1% in 2023—three times higher than in 2021—marking the highest recorded rate since ASRT began monitoring workforce trends in 2003. The Urgent Care sector is particularly strained by this shortage, as RTs undergo extensive two-year academic training, covering advanced imaging techniques that are rarely utilized in an Urgent Care setting. Consequently, Urgent Care centers face significant challenges in recruiting and retaining RTs, which impairs their ability to deliver essential diagnostic services, such as X-rays, to their patients.

Under current Massachusetts law, only licensed radiologic technologists or physicians are permitted to conduct radiography, severely restricting the ability of Urgent Care centers to offer on-site imaging services. This limitation forces patients to seek imaging elsewhere, often leading to unnecessary emergency department visits, increased healthcare costs, and prolonged wait times. The proposed Amendments provide an efficient and practical remedy by introducing a limited-scope radiographer licensure pathway. If enacted, Massachusetts will join 35 other states that have successfully implemented similar licensure pathways, enabling individuals who meet defined educational and examination standards—including passing the ARRT Limited Scope of Practice in Radiography Exam—to perform plain radiographs of specific anatomical regions such as the chest, extremities, spine, sacrum, skull, and podiatry.

Adopting a limited-scope licensure pathway in Massachusetts will yield significant benefits, including:

- **Expanding Access to Timely Diagnostic Services:** Ensuring that Urgent Care centers can provide on-site imaging reduces patient referrals, alleviates emergency department congestion, and improves overall healthcare system efficiency.
- **Maintaining Patient Safety and High Standards of Care:** Establishing clear education and examination criteria ensures that limited-scope radiographers are adequately trained to perform safe and effective imaging procedures.



- **Addressing Workforce Shortages and Career Development:** Introducing a limited-scope radiographer role creates new employment pathways, fostering workforce growth and professional advancement in healthcare.
- **Enhancing the Utilization of Radiologic Technologists:** Delegating fundamental imaging tasks to limited-scope radiographers allows fully licensed RTs to concentrate on advanced imaging procedures where their expertise is most needed.

The Urgent Care Association urges the Massachusetts Department of Public Health to adopt these Amendments as a strategic, evidence-based solution to the ongoing radiologic technologist shortage while maintaining the highest standards of patient care. By implementing this licensing framework, Massachusetts can enhance access to vital imaging services, streamline healthcare delivery, and ultimately improve patient outcomes.

We appreciate your time and consideration of this important initiative. Thank you for your dedication to strengthening the healthcare system and ensuring comprehensive, high-quality care for all Massachusetts residents.

A handwritten signature in black ink, appearing to read 'Lou Ellen Horwitz', with a long horizontal flourish extending to the right.

Lou Ellen Horwitz
Chief Executive Officer
Urgent Care Association