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Mr. Dale Kleven

Administrative Rules Coordinator

Department of Safety and Professional Services

Division of Policy Development

PO Box 8366

I am a clinical instructor with the University of Wisconsin Hospital and Clinics School of Radiologic Technology and President Elect of the Wisconsin Society of Radiologic Technologists. I strongly support the continued licensure of radiographers and issuance of permits to limited x ray machine operators. I would like to provide the following input regarding modification of RAD 5 rules and the formulation of the RAD 7 rules.

**Background: Verification of Continuing Education**

As written in RAD 5.01 (2) the regulations for limited x ray machine operators require that applicants for renewal of their permit provide a signature attesting to the completion of the required 12 credits of continuing education each biennium. Licensed radiographers are required to complete 24 continuing education credits per RAD 5.01 (1), while RAD 5.01 (4) requires the Board to “accept active certification by the American Registry of Radiologic Technologists” as proof of continuing education compliance. While the limited x ray machine operator may attest to compliance with a signature, licensed radiographers must both attest to compliance with continuing education requirements and maintain membership in a national registry that verifies this compliance.

Since the limited x ray machine operator is not certified by the American Registry of Radiologic Technologists and continuing education verification only applies in cases of audit or investigation for alleged misconduct (RAD 5.04) there is a significant difference between methods of verification for licensed radiographers and limited x ray machine operators.

**Recommendation**

To verify compliance, the state could require that the limited x ray machine operator submit the subject, number and type of credits and credit verifying agency on their biennial permit application. In this way the state can verify that each limited x ray machine operator is complying with the requirements of the law.

**Background: Reinstatement of LXMO permit**

In creating the Statement of Scope for RAD 7 relating to late renewal or reinstatement of a license or permit, both the radiographer and limited x ray machine operator should be held to the standards of ARRT Article VI, Section 6.03 (a) (b) (c) (d) Education and/or Examination Requirements for Reinstatement. Where the American Registry of Radiologic Technologists registered licensed radiographer has a clear path for reinstatement provided by the Registry, the limited x ray machine operator does not have this level of guidance. RAD 7 can address this discrepancy. In this way the state can verify that LXMO holders are meeting the same requirements that ARRT registered radiographers must follow to maintain state licensure.

**Recommendation**

Should the limited x ray machine operator apply for reinstatement of permit prior to the end of a biennium up to six months past the end of a biennium, proof of 12 continuing education credits meeting the proper criteria should be included on the application form

Should the limited x ray machine operator apply for reinstatements of permit more than six months after a biennium, the applicant shall be required to retest under the RAD 3.05 Reexamination rules

I thank the Radiography Examining Board for the opportunity to provide this input. As an educator and WSRT Board member, I feel that the verification of continuing education and bringing the limited x ray machine operator reexamination rules into closer compliance with licensed radiographers will help more readily verify the qualifications of limited x ray machine operators and help to ensure that proper patient care is delivered to the citizens of Wisconsin.

Sincerely,

Daniel Vander Meulen

Clinical Instructor

University of Wisconsin School of Radiologic Technology

President Elect, Wisconsin Society of Radiologic Technologists

5236 Brandenburg Way

Madison, WI 53718