



Arkansas Department of Health

4815 West Markham Street • Little Rock, Arkansas 72205-3867 • Telephone (501) 661-2000
Governor Asa Hutchinson
José R. Romero, MD, Secretary of Health

PUBLIC COMMENT REPORT Proposed Amendments to Rules Pertaining to Radiologic Technology Licensure

PUBLIC COMMENTS:

Public comment period expired Monday, March 21, 2022.

Comment #1:

From: Crystal Vigue
Sent: Wednesday, March 2, 2022 10:36 AM

I received the notice of proposed adoption of revisions and would like to comment. I have been an RT for almost 10 years and have actively worked in my field. First I would like to comment on ACT 725 of 2021, I feel it is unfair to offer Fee Waiver to a select group. Many of us have paid our Fees even in financial hardship, I speak from personal experience. My personal opinion on the other ACTs listed in the Notice I received are also of concern to me personally. If we are giving work permits and handing out LT Licenses that hurt those of us that are RTs, if i decided to look for work elsewhere it will become hard for me to find work when they can hire LTs at a smaller pay scale. I went to school for 4 years and hold my AR state Licensure and an ARRT. Thank you for your time and consideration.

Response #1:

The amendments to the Rules for Radiologic Technical Licensure are required by the Arkansas Legislature under Acts 725 of 2021 (“Workforce Expansion Act of 2021” for the fee waiver program), 135 of 2021 (“Arkansas Occupational Licensing of Uniformed Service Members, Veterans, and Spouses Act of 2021”), and 811 of 2021 (“Earn and Learn Act”) and taken directly from the law.

Comment #2:

From: Maureen Sandoval
Sent: Wednesday, March 2, 2022 3:11 PM

I do not agree with ACT 725 of 2021, ACT 746 of 2021 and ACT 811 of 2021. You should not have you license fee waived if you are on government assistant. And I definitely do not agree that if you finish an approved apprenticeship than you get a license. You should have to take a test. I feel like it will be handed out to easily.



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Response #2:

The amendments to the Rules for Radiologic Technical Licensure are required by the Arkansas Legislature under Acts 725 of 2021 (“Workforce Expansion Act of 2021”), 746 of 2021 (granting licensure for persons with work permits), and 811 of 2021 (“Earn and Learn Act”) and taken directly from the law.

Specifically, under Act 811 of 2021, once an individual completes an apprenticeship program that has been approved by the United States Office of Apprenticeship or the Arkansas Department of Workforce Services and the individual completes the other requirements (including examinations, fees, background checks, if applicable), then the individual is eligible for a license under the Rules.

Comment #3:

From: Becky Roberts
Sent: Monday, March 21, 2022 9:24 AM

RE: ACT 811 of 2021

I think it would be beneficial to have licensees complete a radiologic apprenticeship program if they are to be licensed. I do not agree with someone being able to be limited licensed and falling under a physician’s license only. The person needs to have proper training that a physician is normally not able to provide for them. Just because the state says a physician can do an X-ray does not mean they know how to position, set a good technic, and not overexpose patients. I think the state is more concerned with payments of licenses than the individual being knowledgeable about the field. I am old enough to remember when the state implemented the licensure for us. At the time, I recall it was supposed to be for our job security and to have people that are educationally trained performing X-rays, but it has turned into an avenue for revenue for the state. In the real world, there are individuals that should not be performing X-rays because they are not trained appropriately but have a “license”. This is especially true at clinical sites. Bone Densitometry is another example of this. Employers just want a body to do the exams and generally do not care if someone actually knows the appropriate way of performing the exams or has any training. Bone Density is very precise and should be performed according to ISCD protocols but yet almost anyone can do these according to the state. This lack of training with a limited license also interferes with our job security as RT’s.

Response #3:

The amendments to the Rules for Radiologic Technical Licensure are required by the Arkansas Legislature under Acts 725 of 2021 (“Workforce Expansion Act of 2021”), 746 of 2021 (granting licensure for persons with work permits), and 811 of 2021 (“Earn and Learn Act”) and taken directly from the law.



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Specifically, under Act 811 of 2021, once an individual completes an apprenticeship program that has been approved by the United States Office of Apprenticeship or the Arkansas Department of Workforce Services and the individual completes the other requirements (including examinations, fees, background checks, if applicable), then the individual is eligible for a license under the Rules.

With regard to your concerns for limited scope licensure on bone densitometry or other exemptions to the licensure requirements for licensed practitioners, the State Medical Board, State Board of Dental Examiners, State Board of Chiropractic Examiners, State Board of Podiatric Medicine, and related medical professional boards regulate the scope of practice and training requirements for applying ionizing radiation or administer radiopharmaceuticals. The State Board of Health and the Arkansas Department of Health do not regulate the practice of medicine.

No Public Hearing was held.

AGENCY RESPONSE: Proceed to adoption.