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April 7, 2025

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Via Statutorily Prescribed Email

To: The Honorable Cameron Henry, President, Louisiana Senate

The Honorable Phillip DeVillier, Speaker, Louisiana House of Representatives The Honorable Chairman Patrick McMath, Senate Health & Welfare Committee The Honorable Chairman Dustin Miller, House Health & Welfare Committee

From: Hollie Taranto

Executive Director

Louisiana State Radiologic Technology Board of Examiners

Re: Second Report: Proposed Amendments to LAC 46: LXVI, Chapters 9, 11, and 12 - Limited X-ray

Machine Operator Permit (LXMO)

Pursuant to Louisiana La. R.S. 37: § 3207 and 3220 and La. R.S. 46: § 1127, the Louisiana State Radiologic Technology Board of Examiners submits its second report regarding LAC 46: LXVI, Chapters 9, 11, and 12 – Limited X-ray Machine Operator Permit (LXMO).

A Notice of Intent on the proposed rule amendments was published in the January 20, 2025, issue of the Louisiana Register, Volume 51, No. 1. The Board has received one written public comment from the American Society of Radiologic Technologists (ASRT) in support of this rule change and there were no requests for a public hearing to be held. Because there were no requests for a public hearing, one was not held for the proposed rule amendments. Additionally, no substantive changes were made to the proposed rule amendments since the report provided for in R.S.49:966B-C was submitted.

Unless otherwise directed, the Louisiana State Radiologic Technology Board of Examiners anticipates the adopting of the January 20, 2025, Notice of Intent when it is published as a final rule in the May 20, 2025, issue of the *Louisiana Register*.

Please contact Hollie Taranto at <u>execdirector@lsrtbe.org</u> or (504) 838-5231 if the Board may be of any assistance to you concerning this matter.

Sincerely,

Hollie Taranto

Executive Director

Louisiana State Radiologic Technology Board of Examiners

3108 Cleary Avenue, Suite 207

Hollie Tavanto

Metairie, LA 70002

Cc: Dr. Ralph Abraham, Surgeon General, LDH

Dr. Wyche T. Coleman III, Deputy Surgeon General, LDH

Emily Andrews, Office of the Governor

Andrea Trantham, Editor, Louisiana Register, Office of the State Register

Dr. Røbert Newsome, Chair, LSRTBE



American Society of Radiologic Technologists

Hollie Taranto
Executive Director
Louisiana State Radiologic Technology Board of Examiners
3108 Cleary Avenue, Suite 207
Metairie, LA 70002
Via email: execdirector@lsrtbe.org.

February 6, 2025

Dear Ms. Taranto.

The American Society of Radiologic Technologists is the premier association for the medical imaging and radiation therapy profession representing more than 156,000 medical imaging technologists and radiation therapists across the nation, including 2,125 in Louisiana. With that mission in mind, ASRT is encouraged by the proposed rule changes to Title 46 "Professional and Occupational Standards" Part LXVI. Radiologic Technologists.

ASRT understands the need to address workforce shortages through utilization of limited x-ray machine operators; however, patient safety must take priority. By requiring LXMOs to meet initial educational requirements, pass a standardized competency exam, and have continued education, Louisiana is taking a critical step to ensure Louisianians receive safe, high-quality care from qualified medical imaging professionals in private physician offices and urgent cares.

Additionally, limiting the procedures a LXMO can perform and requiring limited x-ray machine operators to pass a national competency exam, this proposed regulation appropriately balances workforce shortage and patient safety issues while ensuring patients receive high quality care.

ASRT appreciates your commitment to providing patients' access to quality health care services that only individuals that meet national education and clinical standards can provide and looks forward to working with you in the future to achieve this goal. Please feel free to contact me at mcheck@asrt.org or 800-444-2778; Ext 1314 if you have any questions.

Sincerely,

Meredith Check, MPP

Director of Government Relations and Public Policy

American Society of Radiologic Technologists