

All About Limited X-ray Operators



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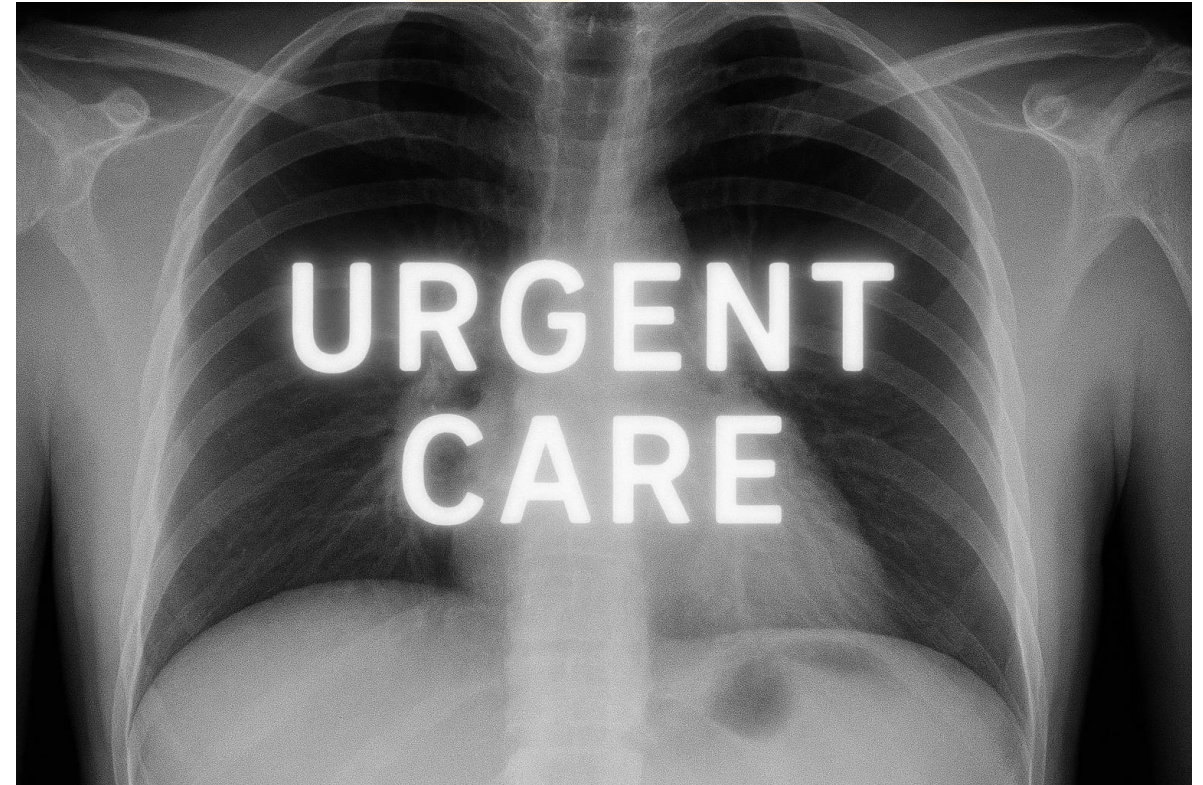
A Little About Me!

- Harpers Ferry, WV | Wife & son | Outdoor enthusiast
- 14 years in radiology | ARRT (R)(CT)
- MBA | Certified Radiology Administrator
- “Grew up” in the hospital, oversaw multi-site imaging departments
- Director of Radiology, PM Pediatric Care (since 2022)
- Advocate for limited X-ray licensure & the urgent care industry
- Extremely passionate about urgent care and the important place that it holds in our healthcare ecosystem



Some Stats

- There are ~15,000 urgent care centers across the nation
- 85% of these have XR capability.
- We typically see around 200 million patients in urgent care annually
- Around 11%, ~22 million, of those patients require an XR



- Source: Journal of Urgent Care Medicine. Most Frequently Occurring X-ray Views in Urgent Care (2016).
- Source: Urgent Care Association (UCA), Talking Points for Urgent Care Association (UCA) Capitol Hill Advocacy Day (personal communication, 2026).

Quick Poll



How many of you have X-ray in your facilities?

How many of you have trouble keeping X-ray available due to lack of qualified professionals to image patients?

How many of you lose patient volume due to X-ray being unavailable?



The Business Case for XR in UC

The Tangible...VOLUME

Can any of us afford to lose 11% of our volume?



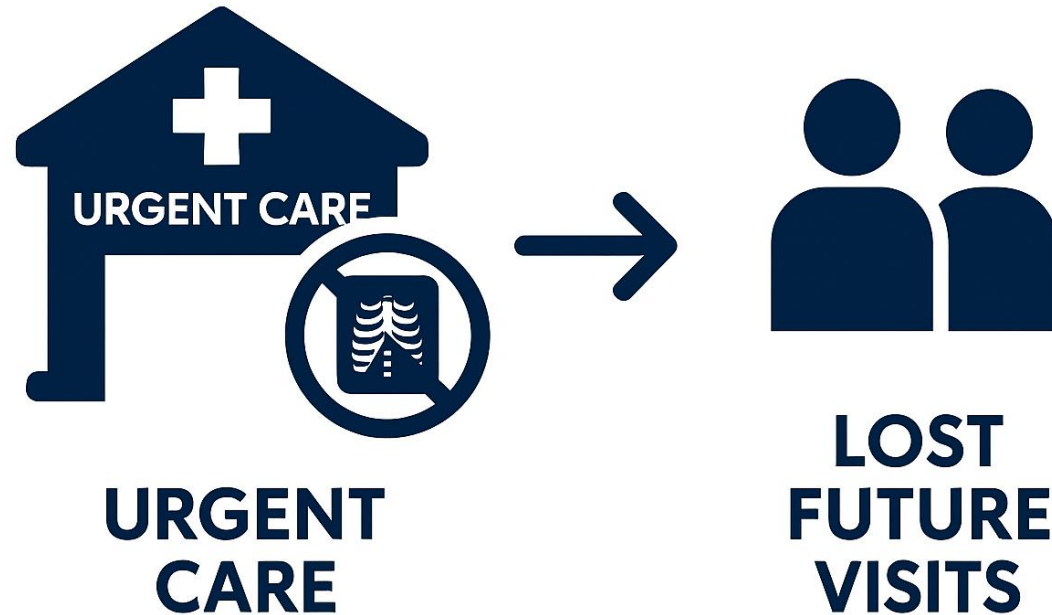
avg. reimbursement per visit (x) 11% of volume=\$\$\$

• Source: Journal of Urgent Care Medicine. Most Frequently Occurring X-ray Views in Urgent Care (2016).

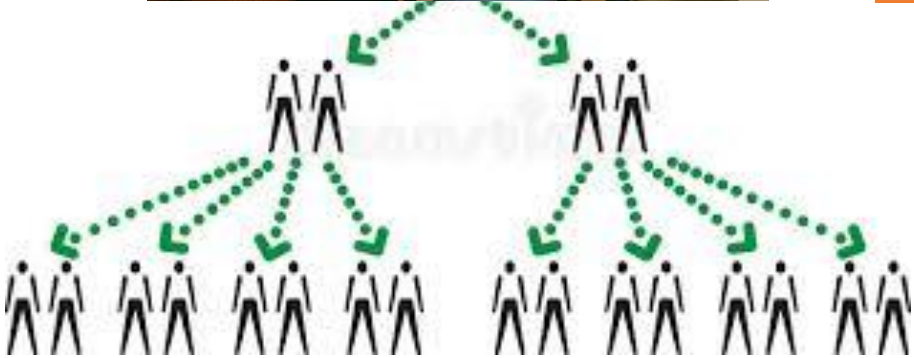
The Less Tangible...RETURN VISITS

- How often do your patients return to your UC?
- If XR is unavailable the first time they visit, it's unlikely they return
- Visit revenue is lost not only for the initial visit, but also for any future visits

LACK OF X-RAY AVAILABILITY



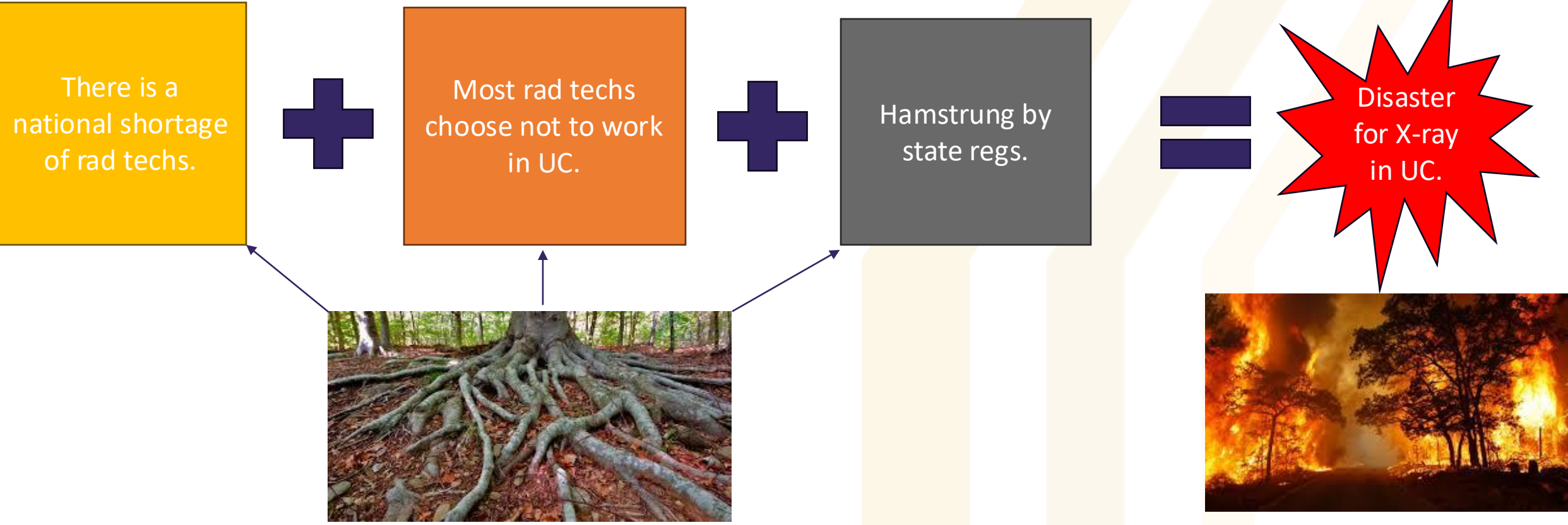
The Intangible...COMMUNITY REPUTATION





Why do we struggle to find rad techs in urgent care?

Let's Get to the Root Cause



The National Shortage of Rad Techs

Pre Pandemic Shortage
-8.5%

Factors Worsening the Shortage
-Workforce shifts
-High compensation packages
-Increasing patient volumes

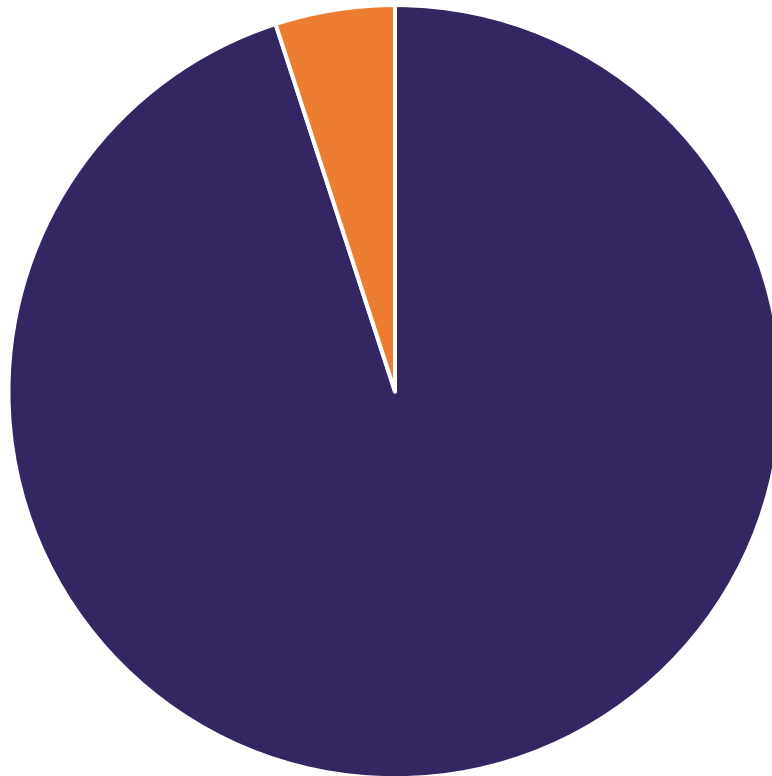
Record High Vacancy Rates
-18.1%

Long Term Outlook
-15,400 positions

- Source: American Society of Radiologic Technologists. (2021). Radiologic sciences workplace and staffing survey report. <https://www.asrt.org/docs/default-source/research/staffing-surveys/radiologic-sciences-workplace-and-staffing-survey-2021.pdf>
- Source: American Society of Radiologic Technologists. (2025, July 24). ASRT staffing and workplace survey shows vacancy rate increases near record highs, aligning with overall health care profession trends. <https://www.asrt.org/main/news-publications/news/article/2025/07/24/asrt-staffing-and-workplace-survey-shows-vacancy-rate-increases-near-record-highs-aligning-with-overall-health-care-profession-trends>
- Source: U.S. Bureau of Labor Statistics. (n.d.). Radiologic technologists. U.S. Department of Labor, Occupational Outlook Handbook. <https://www.bls.gov/ooh/healthcare/radiologic-technologists.htm>

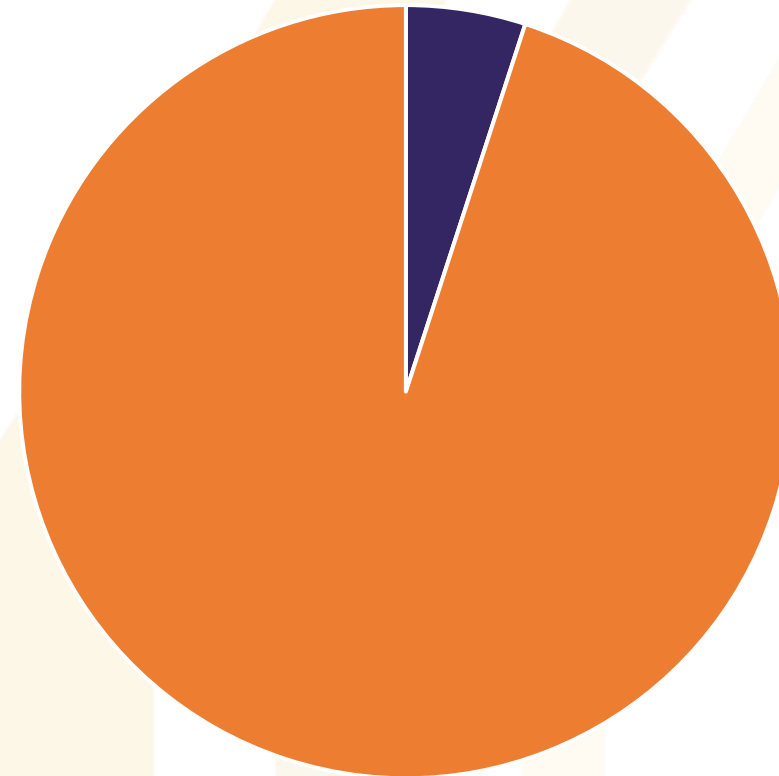
Rad Techs Don't Want to Work in UC- Some Complicated Pie Charts Tell the Story

Rad Tech Working Outside of Urgent Care



■ Rad Tech Tasks ■ Non Rad Tech Tasks

Rad Techs Working in Urgent Care



■ Rad Tech Tasks ■ MA Like Tasks

In Some Places, We are Hamstrung



What is the answer????



The Limited X-ray Operator

KEY FEATURE	DESCRIPTION
Education Requirements	Didactic and clinical training, often followed by ARRT Limited Scope Exam
Scope of Practice	Restricted to specific anatomical areas
Permitted Imaging	Plain radiography only
Typical Background	Often MA, RN, APP, or related medical experience
Training Options	May be provided internally in certain workplaces

Benefits of the Limited Operator for Urgent Care and Beyond

BENEFITS OF LIMITED X-RAY OPERATORS

Train new and existing staff to perform basic X-rays regularly sought in urgent care



RTs can more properly utilize the full scope of their skill set in areas where that expertise is needed most (reducing strain on the market)



Financial benefits (XR techs are expensive)



Lower healthcare costs



An additional pathway for employment and advancement within the health professions

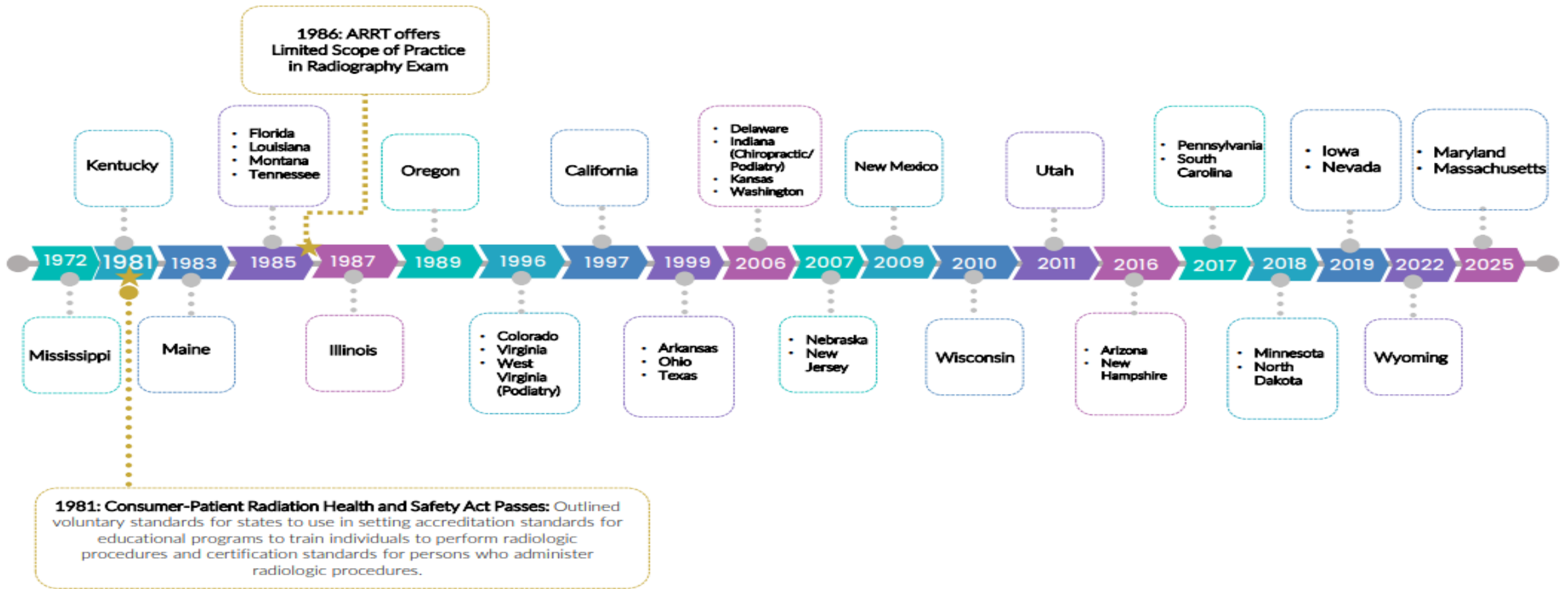


Increase access to radiography services


History of Limited X-ray Operators


Limited Scope X-ray Timeline by State


This timeline shows when each state introduced a Limited Scope Pathway for Diagnostic X-ray.

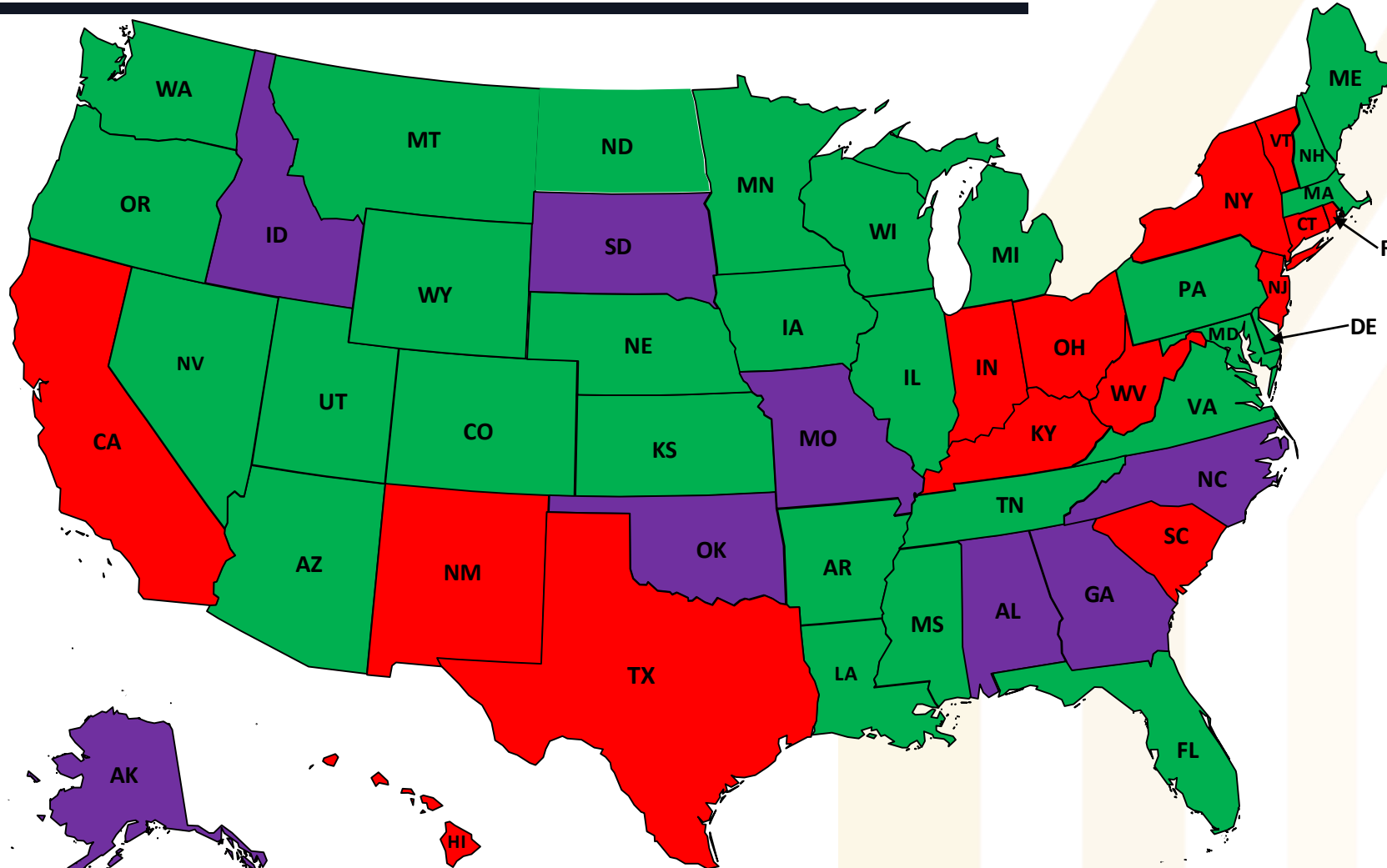


As a UC Org., Where is it Feasible to Incorporate Internal Limited X-ray Training?

Minimal training/no license required 

Feasible to Train Internally to seek licensure 

State regulations don't allow for limited operators or are not conducive to internal training 



**Please, double check with your state before investing time and money.*



How to Implement an Internal Limited XR Training Program

Do you Have the Right Human Resources?



COST CONSIDERATIONS



**Didactic
Program**



**Clinical
Training**



Books



**Retention
& Risk**

- Will the organization pay for licensure/exam fees?
- Will you pay the trainees for the time they spend in the program?
- Will there be an associated pay bump for trainees post licensure?

CHOOSING THE RIGHT PROGRAM



Must meet educational requirements

mandated for limited licensure in the state



- Age of the program
- Competency of instructors
- Virtual vs. in-person learning
- Success with other organizations

Looking for a Limited XR Education Program?

ONLINE COURSES & PLATFORM FOR



Limited Radiography & Continuing Education

Cross-Train Your Clinic Staff in Limited X-Ray

- ✓ Flexible, State-Compliant Education for Medical Limited X-ray Operators.
- ✓ Self-paced online courses for Providers, Medical Assistants, EMTs, and other allied health personnel.
- ✓ Support for your clinical supervisor assisting your students to build real-world skills.
- ✓ Team dashboards to track progress, plus bulk pricing for groups.

CLINICAL TRAINING CONSIDERATIONS



Compliance with state training requirements



Meeting competency volume thresholds



Location for conducting training

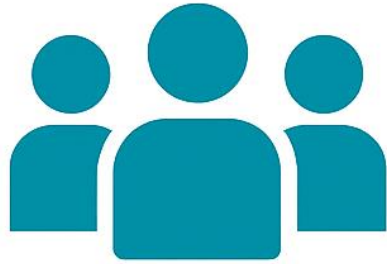


Effect on X-ray patient flow



Integration with normal work schedules

SELECTING TRAINEES: DECISION FACTORS



Operational
need and
staffing
model



Overall
X-ray volume
within
practice



Time and
dedication
of staff
members



Integration
with normal
work
schedules

CONSIDERATIONS FOR ROLLING OUT A LIMITED X-RAY OPERATOR PROGRAM



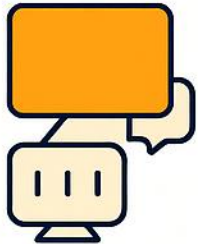
RADIOLOGY LEADERS

Must have a solid understanding of the program, its contents, expected timeline for completion



REGIONAL OPERATIONS

Need to understand requirements that must be met to offer limited operator training in the region, costs and what is expected of them as local leaders



EXISTING RADIOLOGIC TECHNOLOGISTS

The organization will need to manage expectations and feelings; some will think limited operators are being trained to take their jobs, when they are actually being trained to fill gaps in coverage

MONITORING AND EFFECTIVENESS

Post Roll Out



Ensure trainees complete the program and pass their licensure exam



Train limited X-ray techs in the right places, as needed

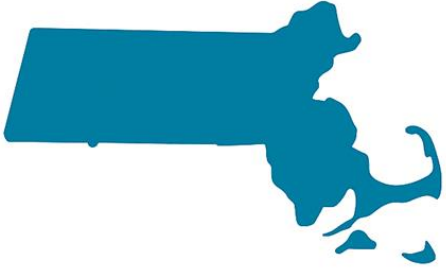
After licensure, monitor image quality and compliance with policies



Advocacy Efforts for Limited Operators

Wins

MASSACHUSETTS



Regulations changed to allow for limited X-ray operators in late 2025

MARYLAND



Law for limited X-ray operators took effect in 2025



Ongoing Efforts



- **Support A2685 and S684!!!**



- **Starting conversations with legislators about limited operators**



SOUTHEAST REGIONAL
URGENT CARE ASSOCIATION

- **Tracking rule changes**
- **Getting a seat at the table for existing legislation**

Opposition to Limited Operators- Claim of a Reduction in Rad Techs

Claims that Introducing Limited XR Operators will Lead to a Reduction in Rad Techs



Data Related to # of First Time Test Takers for The Full Radiography Exam from Two of the Most Recent States to Roll Out Limited Operators.....

Year	NH	NV
2014	48	84
2015	42	78
2016	45	91
2017	59	98
2018	41	91
2019	50	94
2020	53	85
2021	51	111
2022	49	108
2023	52	78
2024		1

• Source: Liana M. Watson, CEO, American Registry of Radiologic Technologists (personal communication, March 8, 2024).

Opposition to Limited Operators: License Won't be Utilized

- Claims That the License Won't be Utilized



Number of Active Limited Licensees in Some States Offering Limited Licensure



• Source: Data compiled in 2024 from direct correspondence with state radiologic licensing agencies and review of publicly available state licensure databases.

Opposition to Limited Operators: Patient Safety

Claims That Limited XR
Operators Create a
Patient Safety Concern



*Limited XR
Operators Have
Been Around
Since the 70's-
No Such
Documented
Concerns*

• Source: Personal observation from extensive literary review.



The Future is Bright for Limited X-ray Operators!

What's Coming?



The American Registry of
Radiologic Technologists®

The ARRT is working to roll out a credential for limited X-ray operators.

This new credential will align the process (not the educational requirements) for becoming a limited operator more closely with that of a radiologic technologist.

Why this Changes the Ballgame...in a Good Way

NATIONAL CREDENTIAL FOR LIMITED X-RAY OPERATORS

A welcomed change for urgent care

NOW

- Varies state by state
- Frustrating differences



FUTURE

- Standardized education & exam
- One national credential



To Sum it Up: Limited X-ray Operators **AMPLIFY** Urgent Care!

- **AMPLIFY Access:** Enable affordable, high-quality care close to home
- **AMPLIFY Efficiency:** Improve workflow and reduce wait times in urgent care centers
- **AMPLIFY Workforce Potential:** Expand the capabilities of existing staff through additional skills

*Limited X-ray operators **AMPLIFY** what urgent care does best: fast, affordable, quality care close to home.*



GET INVOLVED IN STATE ADVOCACY FOR LIMITED X-RAY OPERATORS



If you have questions about limited operators or are interested in joining advocacy efforts, please reach out.

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Q&A



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