



Compliance Report: 40-Hour Limited Scope X-Ray Training

Prepared for: Executive Team, Office Managers, Students

Provider: MI Limited Rad Group

Subject: Program Alignment with Michigan Rule 333.5212

Executive Summary

The MI Limited Rad Group 40-hour curriculum has been developed to meet and exceed the stringent educational requirements mandated by the State of Michigan for non-radiologic technologists. This program fulfills the training requirements necessary for individuals to operate diagnostic X-ray equipment under the "Limited Scope" designation.

I. Regulatory Framework

In Michigan, X-ray operator qualifications are governed by **Rule 333.5212 (Rule 212)** of the Ionizing Radiation Rules. Under this rule, individuals who are not ARRT-registered must complete a minimum of **40 hours** of training that includes both **didactic and clinical** components [Michigan Administration Code](#) (Rule 333.5212(3)).

II. Curriculum Alignment & Gap Analysis

The following table demonstrates how the MI Limited Rad Group curriculum satisfies the specific subject matter requirements outlined in **Rule 333.5212(3)(a-g)**.

State-Mandated Subject	Rule Citation	MI Limited Rad Group Module Alignment
Fundamentals of Healthcare	333.5212(3)(a)	Module 1.4a: Regulatory framework & MI 5212 Module 1.5a: Ethical considerations in imaging
Medical Terminology	333.5212(3)(b)	Module 3.2b: Anatomic landmarks reference Module 4.1–4.7: Procedure-specific terminology



Patient Care & Management	333.5212(3)(c)	Module 3.1a: Patient assessment & screening Module 3.1b: Infection control in imaging suites
Human Anatomy & Physiology	333.5212(3)(d)	Module 4: Deep-dive anatomy for all core exams Module 6.1: Clinical identification of anatomy
Imaging Production & Evaluation	333.5212(3)(e)	Module 1.3a: Image quality factors & focal spot Module 2.3b: Post-processing & artifact recognition
Equipment & Radiation Production	333.5212(3)(f)	Module 2.1a: X-ray production system overview Module 2.2a: Collimation, filtration, & beam restriction
Radiation Protection & Radiobiology	333.5212(3)(g)	Module 1.1a: Basic radiation physics Module 1.2a: Dose, risk, and ALARA principles

III. Scope-Specific Clinical Competency

Michigan law requires specific instruction and clinical training for the operator's intended scope. Our program provides comprehensive coverage for the three primary limited categories:

- **Chest (PA/Lateral):** Addressed in **Module 4.1** and verified via hands-on competency in **Module 6.1**.
- **Extremities (Upper/Lower):** Detailed in **Modules 4.2–4.6**, including specialized positioning for shoulders, knees, and ankles.



- **Spine (C/T/L-Spine):** Covered in **Module 4.7**, including respiration techniques and anatomical landmarks.

IV. Verification of Competency

Per **Rule 333.5212(3)**, a training program must include a clinical component. Our program concludes with **Module 6: In-Person Lab**, which requires a final competency exam (Module 6.2). This ensures that every student can "perform each target exam under observation" before receiving a certificate of completion.

V. Certification

The State of Michigan requires that training be conducted by qualified individuals. To ensure the highest standard of instruction and regulatory compliance:

1. **Instructor Credentials:** All training is developed and led by a Registered Radiologic Technologist (R.T.(R)(ARRT)). This aligns with industry "gold standards" for radiologic education.
2. **Official Certification:** Upon successful completion, students are issued a formal Certificate of Completion.
3. **Audit-Ready Documentation:** Per State requirements, each certificate will include:
 1. The student's legal name and a Unique Student ID Number for tracking.
 2. The Instructor's Name and ARRT Registration Number.
 3. Detailed dates of training and a breakdown of topics covered.
 4. The Instructor's signature, verifying the student has met the 40-hour requirement.

VI. Compliance Timeline

As per the Michigan Department of Labor and Economic Opportunity (LEO), operators currently working under a "Statement of Assurance" have a deadline of **March 13, 2027**, to complete a formal 40-hour program. Adopting this curriculum now ensures the facility is ahead of the regulatory deadline.



VI. Professional & National Standards Alignment

While **Michigan Rule 333.5212** provides the legal framework, the MI Limited Rad Group curriculum is built upon the **ARRT Content Specifications for Limited Scope Radiography**. This ensures that the training is not only state-compliant but also aligns with national best practices recognized by the **MSRT**.

By following these higher standards, your facility ensures a higher level of "Standard of Care," significantly reducing the risk of medical errors and liability.

Comparative Standards Alignment Table

Subject Area	MI Rule 333.5212	MSRT / ARRT Standard	MI Limited Rad Group Module
Radiation Safety (ALARA)	✓ Required	★ Core Pillar	Module 1.2
Image Evaluation	✓ Required	★ Core Pillar	Module 1.3 & 2.3
Patient Care & Ethics	✓ Required	★ Core Pillar	Module 3.1 & 1.5
Anatomy & Positioning	✓ Required	★ Core Pillar	Module 4 & 6
Radiation Physics	✓ Required	★ Core Pillar	Module 1.1 & 2.1
Clinical Competency	✓ Required	★ Required	Module 6.2 (Final Lab)
ARRT-Credentialed Lead	<i>Encouraged</i>	★ Mandatory	Verified: R.T.(R)(ARRT)



VII. Key Competitive Advantages:

- **National Rigor:** Our curriculum follows the ARRT's "Limited Scope of Practice in Radiography" blueprint, which is the benchmark used by 35+ states for licensure.
- **MSRT Advocacy:** As the state's professional society, the MSRT emphasizes the importance of training led by registered professionals. By having an **ARRT-registered instructor**, this program provides the professional oversight the MSRT advocates for to protect Michigan patients.
- **Future-Proofing:** Should Michigan ever move toward a mandatory state licensing exam (as many states have), your staff will already be trained on the national material required to pass.

VIII. ****Regulatory Note: Initial Certification vs. Continuing Education****

To ensure the facility remains in full compliance with Michigan's evolving radiation safety standards, it is important to distinguish between the two different regulatory requirements for X-ray operators:

1. **Initial 40-Hour Training (Rule 333.5212):**

The State of Michigan does not "pre-approve" or "license" specific 40-hour training programs. Instead, the law puts the legal onus on the facility to verify that their chosen training program meets all state-mandated categories (Anatomy, Physics, Protection, etc.) and is taught by a qualified instructor. By choosing our program—developed and led by an ARRT-registered technologist—the facility satisfies its duty to verify that the training is of the highest professional caliber.

2. **Biennial Continuing Education (Rule 333.5213):**

Unlike the initial training, the 12 CE credits required every 24 months must be accredited by a Recognized Continuing Education Evaluation Mechanism (RCEEM), such as the ASRT.

Our Commitment to Your Compliance:

While our 40-hour course fulfills your immediate legal requirement for staff certification, we are currently in the process of obtaining ASRT/RCEEM accreditation for our upcoming "Compliance Vault" modules. This ensures that the ongoing continuing education we provide will meet the state's strict accreditation standards for biennial renewals, keeping your facility compliant both now and in the future.



VIII. The Compliance Vault (Coming Soon)

To ensure your facility remains compliant long after the initial 40-hour training, we will be offering a specialized **Post-Certification Compliance Program**. This is a managed, private learning environment designed to act as your facility's **Digital Compliance Vault**.

We are currently in the development phase of our **Digital Compliance Vault & CE Portal**. This platform is designed to transition your staff from their initial 40-hour certification into their long-term 12-credit biennial requirement.

- **ASRT/RCEEM Approval Pending:** We are actively working through the **ASRT (American Society of Radiologic Technologists)** approval process. This ensures that the supplemental education provided in the "Vault" will carry **Category A CE Credits** recognized both by the State of Michigan and the ARRT.

Key Administrative Benefits:

- **Drip-Feed CE Credits:** To maintain high standards and satisfy Michigan's ongoing continuing education requirements, staff receive automated CE credits delivered monthly over a two-year period.
- **Administrator Dashboard:** Your management team receives a dedicated login to monitor staff progress in real-time. You will never have to wonder if your team is up-to-date.
- **Inspector-Ready Documentation:** In the event of a state inspection or MIOSHA audit, the administrator can instantly export and print education records and certificates for every staff member.
- **Automated Record-Keeping:** Eliminates the risk of lost paper certificates or expired training credentials.

Facility Investment:

We will be offering this compliance insurance for a flat annual fee, ensuring your facility stays "audit-ready" 365 days a year.

- **Tier 1:** Up to 5 Staff Members
- **Pricing:** \$49/month (Billed annually at \$588)



VII Conclusion: A Partnership in Compliance

The MI Limited Rad Group 40-hour program is designed to provide more than just a certificate of completion; it provides a foundation of clinical excellence. By aligning our curriculum with Michigan Rule 333.5212, ARRT National Standards, and MSRT professional guidelines, we ensure your staff is trained to the highest possible standard of safety and diagnostic quality. Our use of an ARRT-registered instructor ensures that your facility is backed by professional-grade oversight, significantly reducing the liability associated with medical imaging.

Next Steps: Securing Your Limited Scope X-ray Certification and "Digital Compliance Vault"

To move forward with securing your facility's regulatory standing, we recommend the following:

1. **Program Enrollment:** Finalize the 40-hour training dates for your staff to meet the 2027 state deadline.
2. **Optional Compliance Automation:** Activate your Digital Compliance Vault subscription **once our digital compliance vault is live**. For \$49/month (billed annually), we will set up your administrator portal, giving you instant access to staff education records, CE training and the "Inspector-Ready" printing suite for up to 5 members.