

G.S. 150B-21.3A Report for 21 NCAC 65, Board of Recreational Therapy Licensure												
Agency - Board of Recreational Therapy Licensure												
Comment Period - 4/17/2024-6/19/2024												
Date Submitted to APO - November 26, 2024												
Subchapter	Rule Section	Rule Citation	Rule Name	Date and Last Agency Action on the Rule	Agency Determination [150B-21.3A(c)(1)a]	Required to Implement or Conform to Federal Regulation [150B-21.3A(d1)]	Federal Regulation Citation	Public Comment Received [150B-21.3A(c)(1)]	Agency Determination Following Public Comment [150B-21.3A(c)(1)]	RRC Determination of Public Comments [150B-21.3A(c)(2)]	RRC Final Determination of Status of Rule for Report to APO [150B-21.3A(c)(2)]	OAH Next Steps
	SECTION .0200 – REQUIREMENTS FOR PRACTICE	21 NCAC 65 .0203	LICENSED RECREATIONAL THERAPIST STANDARDS OF PRACTICE	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 21, 2018	Necessary	No		Yes	Necessary	One or more comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .0204	LICENSED RECREATIONAL THERAPY ASSISTANT STANDARDS OF PRACTICE	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 21, 2018	Necessary	No		No	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .0205	SUPERVISION OF A LICENSED RECREATIONAL THERAPY ASSISTANT	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 21, 2018	Necessary	No		Yes	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
	SECTION .0300 – REQUIREMENTS FOR LICENSURE	21 NCAC 65 .0301	MINIMUM LEVEL OF EDUCATION AND COMPETENCY FOR LICENSED RECREATIONAL THERAPIST	Amended Eff. August 1, 2022	Necessary	No		Yes	Necessary	One or more comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .0302	MINIMUM LEVEL OF EDUCATION AND COMPETENCY FOR LICENSED RECREATIONAL THERAPY ASSISTANTS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 21, 2018	Necessary	No		Yes	Necessary	One or more comments with merit	Necessary and must be readopted	Agency must readopt
	SECTION .0400 - APPLICATION	21 NCAC 65 .0401	APPLICATION PROCEDURES FOR LICENSED RECREATIONAL THERAPIST AND LICENSED RECREATIONAL THERAPY ASSISTANT	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 21, 2018	Necessary	No		Yes	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .0501	LICENSURE FEES	Amended Eff. August 1, 2022	Necessary	No		Yes	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
	SECTION 0600 - CONTINUING EDUCATION REQUIREMENTS	21 NCAC 65 .0601	CONTINUING EDUCATION REQUIREMENTS FOR LICENSED RECREATIONAL THERAPIST AND LICENSED RECREATIONAL THERAPY ASSISTANT	Amended Eff. March 1, 2020	Necessary	No		Yes	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .0602	RENEWAL REQUIREMENTS FOR LICENSED RECREATIONAL THERAPIST AND LICENSED RECREATIONAL THERAPY ASSISTANT	Amended Eff. March 1, 2020	Necessary	No		Yes	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .0603	CHANGE OF ADDRESS OR NAME REQUIREMENTS FOR LICENSED RECREATIONAL THERAPIST AND LICENSED RECREATIONAL THERAPY ASSISTANT	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 21, 2018	Necessary	No		Yes	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .0604	LRTA RENEWAL SUPERVISION REQUIREMENT	Eff. March 1, 2016	Necessary	No		No	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
	SECTION .0700 – REINSTATEMENT	21 NCAC 65 .0701	REINSTATEMENT OF LAPSED LICENSE	Amended Eff. August 1, 2022	Necessary	No		Yes	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .0801	INACTIVE STATUS	Amended Eff. March 1, 2020	Necessary	No		Yes	Necessary	One or more comments with merit	Necessary and must be readopted	Agency must readopt
	SECTION .0900 - RECIPROCITY	21 NCAC 65 .0901	ENDORSEMENT	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 21, 2018	Necessary	No		Yes	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .0902	MILITARY ENDORSEMENT	Amended Eff. March 1, 2020	Necessary	No		Yes	Necessary	One or more comments with merit	Necessary and must be readopted	Agency must readopt
	SECTION .1000 - REVOCATION, SUSPENSION OR DENIAL OF LICENSURE	21 NCAC 65 .1001	COMPLAINTS AND REPORTS	Pursuant to G.S. 150B-21.3A, rule is necessary without substantive public interest Eff. October 21, 2018	Necessary	No		Yes	Necessary	One or more comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .1002	INVESTIGATIONS	Eff. October 1, 2017	Necessary	No		No	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .1003	LETTER OF NOTIFICATION	Eff. October 1, 2017	Necessary	No		Yes	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .1004	UNAUTHORIZED PRACTICE	Eff. October 1, 2017	Necessary	No		No	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .1005	VIOLATIONS	Eff. October 1, 2017	Necessary	No		No	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt

G.S. 150B-21.3A Report for 21 NCAC 65, Board of Recreational Therapy Licensure												
Agency - Board of Recreational Therapy Licensure												
Comment Period - 4/17/2024-6/19/2024												
Date Submitted to APO - November 26, 2024												
Subchapter	Rule Section	Rule Citation	Rule Name	Date and Last Agency Action on the Rule	Agency Determination [150B-21.3A(c)(1)a]	Required to Implement or Conform to Federal Regulation [150B-21.3A(d1)]	Federal Regulation Citation	Public Comment Received [150B-21.3A(c)(1)]	Agency Determination Following Public Comment [150B-21.3A(c)(1)]	RRC Determination of Public Comments [150B-21.3A(c)(2)]	RRC Final Determination of Status of Rule for Report to APO [150B-21.3A(c)(2)]	OAH Next Steps
		21 NCAC 65 .1006	SANCTIONS	Eff. October 1, 2017	Necessary	No		No	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt
		21 NCAC 65 .1007	HEARINGS	Eff. October 1, 2017	Necessary	No		No	Necessary	No comments with merit	Necessary and must be readopted	Agency must readopt

Agency	Rule	Name	Type of Comment	Comment	Agency Response
<b>Copy all columns in this row to the right of this yellow cell and paste in new rows</b>			Select One		
<b>Environmental Management Commission</b>	Update This	Update This	Select One		
Western Piedmont Community College	21 NCAC 65 .0302	Katharine Wright, MS, LRT, CTRS Department Head--Allied Health Program Coordinator--Recreational Therapy Assistant Western Piedmont Community College 828-448-3536	Public Comment as defined in G.S. 150B-21.3A (a)(5)	The current rule (21 NCAC 65 .0302) only requires 9 semester hours of RT content courses at the assistant level. I recommend changing the requirement to 12 semester hours (or 4 content courses). This change reflects consistency across recreational therapy education. A recent change initiated by NCTRC (and adopted by NCBRTL) increased the required content courses for the therapist-level practitioner from 5 to 6. Increasing the content courses at the assistant-level from 3 to 4 is necessary	Merit- NCBRTL Board Members agree with this comment and will pursue a rule change from 9 semester hours to 12 semester hours for LRTAs as it reflects the profession's growth.

				to remain consistent with respect to professional education. Thank you for your consideration of my comment.	
Western Carolina University	21 NCAC 65.0203	Jennifer Hinton Department: Health Sciences Program: Recreational Therapy Rank: Associate Professor Title: Program Director and Clinical Coordinator Work Phone: 828.227.2715 Work Email: jlhinton@wcu.edu Office address: HHSB 442	Public Comment as defined in G.S. 150B-21.3A (a)(5)	It's now \$35 for non-members. I wonder if we want to not put in exact costs but rather just put in where it can be acquired?	Merit- NCBRTL Board agrees with this comment. Update the SOP purchase costs- ATRA Members is \$28.00 and Non-ATRA members \$35.00

Western Carolina University	21 NCAC 65.0301	Jennifer Hinton Department: Health Sciences Program: Recreational Therapy Rank: Associate Professor Title: Program Director and Clinical Coordinator Work Phone: 828.227.2715 Work Email: jlhinton@wcu.edu Office address: HHSB 442	Public Comment as defined in G.S. 150B-21.3A (a)(5)	Six courses	No Merit- NCBRTL Board has already made this change to .0301- Amended Eff. August 1, 2022
Western Carolina University	21 NCAC 65.0301	Jennifer Hinton Department: Health Sciences Program: Recreational Therapy Rank: Associate Professor Title: Program Director and Clinical Coordinator Work Phone: 828.227.2715 Work Email: jlhinton@wcu.edu Office address: HHSB 442	Public Comment as defined in G.S. 150B-21.3A (a)(5)	Coursework for a degree seems repetitive	Merit- NCBRTL Board agrees- this is redundant since degree requirements are stated above. It adds to the confusion about specialization. The Board favors removing the phrase "for a degree or specialization in RT."
Western Carolina University	21 NCAC 65.0301	Jennifer Hinton Department: Health Sciences Program: Recreational Therapy Rank: Associate Professor Title: Program Director and	Public Comment as defined in G.S. 150B-21.3A (a)(5)	I think that changing these to the new NCTRC domains could be helpful (APIED (doc is part of eval) and add professionalism	Merit- APIED is one part of the Standards of Practice, and the Board prefers that all standards be upheld/recognized, not just the APIED steps. The Board would like to change

		<p>Clinical Coordinator</p> <p>Work Phone: 828.227.2715</p> <p>Work Email: jlhinton@wcu.edu</p> <p>Office address: HHSB 442</p>		and administration).	<p>"related to the "APIE(D) Process" to "related to the Standards of Practice." The Board would also like to update course titles to include professionalism, administration/management, and documentation.</p>
Western Carolina University	21 NCAC 65.0301	<p>Jennifer Hinton</p> <p>Department: Health Sciences</p> <p>Program: Recreational Therapy</p> <p>Rank: Associate Professor</p> <p>Title: Program Director and Clinical Coordinator</p> <p>Work Phone: 828.227.2715</p> <p>Work Email: jlhinton@wcu.edu</p> <p>Office address: HHSB 442</p>	Public Comment as defined in G.S. 150B-21.3A (a)(5)	Is it potentially appropriate to incorporate CARTE wording here? On page 19 of the Standards and Guidelines, they have suggested additional curriculum competencies listed as: a) Motor Learning, b) Counseling, Group Dynamics and leadership, c) first aid and safety, d) pharmacology, e) health care organization and delivery; legal aspects of health care.	No Merit- since not all schools have CARTE accreditation

Western Carolina University	21 NCAC 65.0301	Jennifer Hinton Department: Health Sciences Program: Recreational Therapy Rank: Associate Professor Title: Program Director and Clinical Coordinator Work Phone: 828.227.2715 Work Email: jlhinton@wcu.edu Office address: HHSB 442	Public Comment as defined in G.S. 150B-21.3A (a)(5)	Can we put in writing here that the university supervisor needs to be licensed? I know it's implied because we have to be licensed to teach, but it may provide emphasis for admins who try to have non-RT faculty supervising RT internships.	No Merit- the rule states that the University supervisor shall be licensed .0301, C 3 B. Education/teaching/ instruction is a part of the practice, and all practicing RTs must be licensed as referenced in section 22 definitions.
Western Carolina University	21 NCAC 65.0301	Jennifer Hinton Department: Health Sciences Program: Recreational Therapy Rank: Associate Professor Title: Program Director and Clinical Coordinator Work Phone: 828.227.2715 Work Email: jlhinton@wcu.edu Office address: HHSB 442	Public Comment as defined in G.S. 150B-21.3A (a)(5)	The CTRS should have the registered trademarked (R with a circle), as does NCTRC, each time it is used.	No Merit- current rules do trademark CTRS. NCTRC is not a trademark

Western Carolina University	21 NCAC 65.0501	Jennifer Hinton Department: Health Sciences Program: Recreational Therapy Rank: Associate Professor Title: Program Director and Clinical Coordinator Work Phone: 828.227.2715 Work Email: jlhinton@wcu.edu Office address: HHSB 442	Public Comment as defined in G.S. 150B-21.3A (a)(5)	Are the current fees sufficient for continuing the business of the organization?	No Merit- some fees were increased in 2022. The board will review some fees in the future as apart of the strategic plan
Western Carolina University	21 NCAC 65.0601	Jennifer Hinton Department: Health Sciences Program: Recreational Therapy Rank: Associate Professor Title: Program Director and Clinical Coordinator Work Phone: 828.227.2715 Work Email: jlhinton@wcu.edu Office address: HHSB 442	Public Comment as defined in G.S. 150B-21.3A (a)(5)	Has any consideration been made for requireing specific types of CE over the two-year period, such as ethics? It may not go into this iteration, but could be a consideration for moving the field forward.	No Merit at this time. Yes, consideration has been made, but NCBRTL is not ready for implementation at this time.
Western Carolina University	21 NCAC 65.0601	Jennifer Hinton Department: Health Sciences Program: Recreational Therapy Rank: Associate Professor Title: Program Director and	Public Comment as defined in G.S. 150B-21.3A (a)(5)	These ("thank you" letters) are sometimes difficult to provide, especially for conferences outside of NC. Is there an	No Merit- Documentation for presentations shall be in the form of letter or email from the sponsoring body stating the licensee's name, date, content, and the length of



		<p>Clinical Coordinator</p> <p>Work Phone: 828.227.2715</p> <p>Work Email: jlhinton@wcu.edu</p> <p>Office address: HHSB 442</p>		alternative for this?	presentation to confirm completion of the presentation.
Western Carolina University	21 NCAC 65.0601	<p>Jennifer Hinton</p> <p>Department: Health Sciences</p> <p>Program: Recreational Therapy</p> <p>Rank: Associate Professor</p> <p>Title: Program Director and Clinical Coordinator</p> <p>Work Phone: 828.227.2715</p> <p>Work Email: jlhinton@wcu.edu</p> <p>Office address: HHSB 442</p>	Public Comment as defined in G.S. 150B-21.3A (a)(5)	Are there other ways that we can do some regulation for online training? Maybe needing to provide the credentials of the person giving the training? Some of them listed by non-professional-association providers aren't even being led by CTRS.	No Merit- at this time there is not a way to track down all the online training and track it.
Western Carolina University	21 NCAC 65.0603	<p>Jennifer Hinton</p> <p>Department: Health Sciences</p> <p>Program: Recreational Therapy</p> <p>Rank: Associate Professor</p> <p>Title: Program Director and Clinical Coordinator</p> <p>Work Phone: 828.227.2715</p> <p>Work Email: jlhinton@wcu.edu</p> <p>Office address: HHSB 442</p>	Public Comment as defined in G.S. 150B-21.3A (a)(5)	Do you really still give us our passwords? Maybe the initial one?	No Merit- once licensed a LRT/LRTA can log in and change contact information at any time.

UNC Wilmington	Rules 21 NCAC 65 .0602, .1003	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Come nt as defin ed in G.S. 150B- 21.3A (a)(5)	Overall, should these include his/her/their pronouns (i.e., more inclusive pronouns)?	Merit- The Board would like to refer to RRC- Has this been established in 150B? The Board is willing to make pronoun changes to "applicant" or "licensee" within the rules.
UNC Wilmington	Rules 21 NCAC 65 .0205	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Come nt as defin ed in G.S. 150B- 21.3A (a)(5)	Currently, is there a standardized training for supervision? Is this what is currently being developed via "the manual"?	No Merit— SOP includes supervision as defined under (a). Most LRTAs are employed at state- operated centers. The Board will review/consister this type of trainign to be developed in the future.
UNC Wilmington	Rules 21 NCAC 65 .0205	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Come nt as defin ed in G.S. 150B- 21.3A (a)(5)	G)-This has been violated by a few internship supervisors we've had (academic and organizational). How is this upheld? Is there penalty for violating this?	No Merit- comment refers to a student, not an LRTA. This person is confusing rule .0205 Supervision of a Licensed Recreational Therapy Assistant and the educational requirements for internship in .0301 Minimum Level of Education and Competency for Licensed Recreational Therapist. Disciplinary actions would be taken if there were violations.

UNC Wilmington	Rules 21 NCAC 65 .0205	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Come nt as defin ed in G.S. 150B- 21.3A (a)(5)	(H) While I understand every TR/RT program is different, due to risk/safety regarding provider-to- patient ratios, or lack thereof, I feel we should set a standard ratio for programming and preferably a max amount. Ratios are a top focus for other healthcare professions too, at this time. Nursing continues to push bills to support this and I feel we should too.	No Merit- NCBRTL does not have the authority to regulate agencies caseloads.
UNC Wilmington	Rules 21 NCAC 65 .0301	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Come nt as defin ed in G.S. 150B- 21.3A (a)(5)	3- To clarify, does this mean that no university/college program should exist that does not lead to certification? The reason I ask is that I've heard RT/TR educators discuss minors or tracks that do not require the field work and/or internship. I have many negative	No Merit- The license is a higher credential and not a certification. We have no control over NCTRC certification and education programs outside North Carolina. Current North Carolina RT/TR programs meet NCBRTL Licensure requirements.

				feelings regarding this...	
UNC Wilmington	Rules 21 NCAC 65 .0302	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Comment as defined in G.S. 150B-21.3A (a)(5)	4)- is this current?	No Merit- yes it is current.
UNC Wilmington	Rules 21 NCAC 65 .0302	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Comment as defined in G.S. 150B-21.3A (a)(5)	4)- I feel this should be changed, elevated, but can we? In our RT program, students must replicate any class/experience where they've earned lower than a C-.	No Merit- not all schools use letter grades for internships. Some still use pass/fail.
UNC Wilmington	Rules 21 NCAC 65 .0401	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Comment as defined in G.S. 150B-21.3A (a)(5)	(2)-Clarification needed: is this stating that both the initial application and initial fee for licensure are required? If so, revise for clarity.	No Merit- refer back to .0501 C refers to the initial application fee.
UNC Wilmington	Rules 21 NCAC 65 .0601	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email	Public Comment as defined in G.S. 150B-21.3A (a)(5)	(d)- Does this statement indicate that content for trainings can/may be approved if not already approved by	No Merit- all continuing education is reviewed for approval based on renewal requirements .0601 and .0602.

		grayc@uncw.edu		IACET? Otherwise, why would a LRT or LRTA submit these?	
UNC Wilmington	Rules 21 NCAC 65 .0700	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Comment as defined in G.S. 150B-21.3A (a)(5)	Reinstatement- In review of this section, are there are any conditions under which reinstatement would never be granted (e.g., violation of state licensure laws, ethics, malpractice, death of a patient, etc.)? Should this be made explicit?	No Merit—This is addressed under disciplinary actions, not reinstatement. Anyone can apply (application process) and either be awarded the LRT or denied. If denied, the disciplinary process would be followed.
UNC Wilmington	Rules 21 NCAC 65 .0801	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Comment as defined in G.S. 150B-21.3A (a)(5)	(c)- Suggested change: 1-3 years	No Merit- The rule is in line with current renewal cycle of every 2 years.
UNC Wilmington	Rules 21 NCAC 65 .0801	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Comment as defined in G.S. 150B-21.3A (a)(5)	(d) items 1, 2, 3- Suggested change: 3-4 years inactive would require either 20 hours of CEUs or 40 hours of supervision by an active CTRS, LRT [either preference of individual or NCBRTL]. Rationale: rapid advances in	No Merit- The board doesn't want to lower standards for someone who wasn't practicing.

				technology, EBPS (capturing singular conditions and comorbidities), and so forth would make someone who had not practiced for 3 years behind current practice. Then, this has an impact on both patient care and the supervision/instruction of interns and junior practitioners.	
UNC Wilmington	Rules 21 NCAC 65 .0901	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Comment as defined in G.S. 150B-21.3A (a)(5)	clarify "Endorsement" meaning.	No Merit- The Board believes this term came from the legislator and is consistent with state language/North Carolina Term of Acceptance and consistent with other occupational licensing boards.
UNC Wilmington	Rules 21 NCAC 65 .0902	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Comment as defined in G.S. 150B-21.3A (a)(5)	(1)- color photograph- Use same language as item #1 on previous section.	Merit- change to "a head and shoulders color photograph of the applicant." However, the last rule written was Military Endorsement, and rules review staff suggested taking out "head and shoulders," that it could be assumed.

UNC Wilmington	Rules 21 NCAC 65 .0902	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Come nt as defin ed in G.S. 150B- 21.3A (a)(5)	(E) and (1)- Use same language as item #1 on previous section.	Merit- change to "a head and shoulders color photograph of the applicant." However, the last rule written was Military Endorsement, and rules review staff suggested taking out "head and shoulders," that it could be assumed.
UNC Wilmington	Rules 21 NCAC 65 .1001	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Come nt as defin ed in G.S. 150B- 21.3A (a)(5)	4- Suggestion: spell out the procedures/pro cesses and consequences.	No Merit- procedures and processes are in rules section .1001- .1007.
UNC Wilmington	Rules 21 NCAC 65 .1001	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Come nt as defin ed in G.S. 150B- 21.3A (a)(5)	5- clarify - the licensing board's final decision regarding penalty/violatio n or what?	No Merit- yes, the decision is in writing and will spell out the result of the investigation as stated in rule .1005 and .1006.
UNC Wilmington	Rules 21 NCAC 65 .1001	Dr. Cara Gray, Associate Professor, McNeill Hall 3008 Wilmington NC Telephone: 910-962-3733 and email grayc@uncw.edu	Public Come nt as defin ed in G.S. 150B- 21.3A (a)(5)	f- Who receives this documentation and/or where is it retained?	No Merit—the violation, agency, and/or supervisor receives documentation, and files are retained at the NCBRTL office. Information is also posted on the website for one year and reported to the National Practitioner Data Bank under the Health Resources

					Services Administration.
UNC Wilmington	Rules 21 NCAC 65.0301	Brent L. Hawkins, PhD, LRT, CTRS, CARSS-II, FDRT Professor Program Coordinator - Recreation Therapy and Assistance Dog Training University of North Carolina Wilmington 3010 McNeill Hall 601 South College Road Wilmington, NC 28403-5625 hawkinsb@uncw .edu Cell: 864-207- 3672 Office: 910-962- 3717	Public Come nt as defin ed in G.S. 150B- 21.3A (a)(5)	B 3- states Commission of Accreditation of Allied Health Education (CAAHEP) but should state Commission on Accreditation of Allied Health Education.	Merit- NCBRTL Board agrees to this technical change- remove "of" and replace with "on."