



August 28, 2025

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609

**RE: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

To the Rules Review Commission:

As a doctor in this state, I am writing to object to the North Carolina State Board of Dental Examiner ("Dental Board")'s adoption of two new rules, 21 NCAC 16F.0111 and 21 NCAC 16V.0103, and its amendment of 21 NCAC 16A.0101, which were voted on at the Dental Board's July 11, 2025 meeting (the "Supervision Rule Changes"). The Supervision Rule Changes were adopted by the Dental Board despite objections raised by commentators.

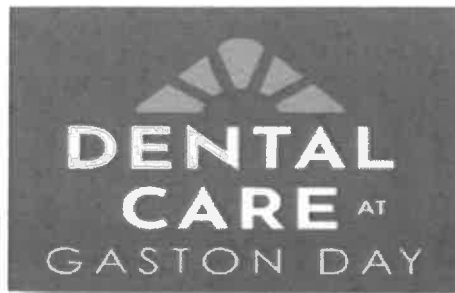
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As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,

Matthew Diansel, DDS MS





August 28, 2025

Rules Review Commission

1711 New Hope Church Road

Raleigh, North Carolina, 27609

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

RE: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110

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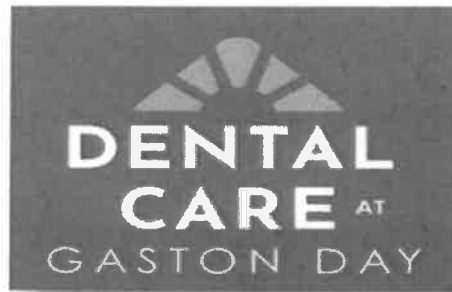
Best Regards,

A handwritten signature in cursive script that reads "Chyna Wyche". The signature is written in dark ink and is positioned above the printed name.

Chyna Wyche, DDS

1917 Hoffman Rd

Gastonia, NC 28054



August 28, 2025

Rules Review Commission

1711 New Hope Church Road

Raleigh, North Carolina, 27609

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

RE: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110

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Best Regards,

A handwritten signature in dark ink, appearing to read "Carolyn Belyshev DDS", written over a horizontal line.

Carolyn Belyshev, DDS

1917 Hoffman Rd

Gastonia, NC 28054

**Farmington  
Village**  
DENTAL CARE

August 28, 2025

Via U.S. Mail and email

Rules Review Commission

1711 New Hope Church Road

Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,



Patricia Rodriguez, DDS





August 28, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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Best regards,

  
Madhuri Katta DDS, MHA  
Associate Dentist  
1608 Autumn Ridge Dr  
Durham, NC.

August 28, 2025

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1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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Best regards,



[Name, Title, Home Address]

Brian Cahill, DDS  
700 Altadora Crescent  
Macon, NC 27559



August 28, 2025

Rules Review Commission  
1711 New Hope Church Road  
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Best regards,

Olivia Dunning, DDS  






*Combining the Love of Art & the  
Science of Dentistry to Create Beautiful Smiles*

*J. GREGORY MAYES, DDS  
LISA H. MAYES, DDS*

August 28, 2025

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Best regards,

J. Gregory Mayes, D.D.S.  
Dentist  
912 Havens Edge Ct.  
Apex, NC 27523



August 28, 2025

Via U.S. Mail and email

Rules Review Commission

1711 New Hope Church Road

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To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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Best regards,

A handwritten signature in black ink, appearing to read "Marlene Beeson", written over a horizontal line.

Marlene Beeson, DDS



August 28, 2025

**Via U.S. Mail and email**

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1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

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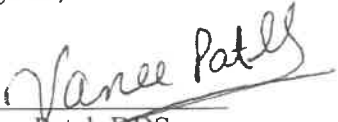
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Best regards,

  
\_\_\_\_\_  
Dr. Vanee Patel, DDS  
1513 Salem Village Dr.  
Apex, NC 27502

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---

[Name, Title, Home Address]

August 28, 2025

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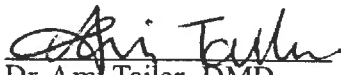
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Best regards,

  
Dr. Ami Tailor, DMD  
812 Berwick Valley Ln  
Cary, NC 27513





August 28, 2025

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1711 New Hope Church Road  
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Best regards,

A handwritten signature in black ink, appearing to read "Mengchi Steven Yang", is written over a horizontal line.

Dr. Mengchi Steven Yang, D.D.S.

12723 Lindrick Ln

Charlotte, NC 28277

August 28, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

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I am writing to express my concerns regarding the proposed rule that would require dentists in North Carolina to be "supervised" unless they are practice owners. This provision is problematic, as the vast majority of licensed dentists in the state hold unrestricted licenses and should not be subject to supervisory requirements by dentists other than the Board of Dental Examiners themselves.

I respectfully object to the proposed Supervision Rule Changes for several reasons: they appear to exceed the authority granted to the North Carolina State Board of Dental Examiners by the General Assembly; they are vague and ambiguous; they do not appear to be reasonably necessary to implement and pose a restrictive, undue oversight on dentists working for professional corporations to which other dentists are not subject.

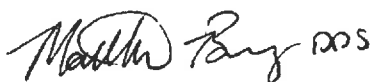
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Best regards,

Dr. Matthew Bright

337 Rose Walk Ln.

Carrboro, NC 27510

A handwritten signature in black ink that reads "Matthew Bright" followed by the year "2025". The signature is written in a cursive, flowing style.

**Via U.S. Mail and email**

Rules Review Commission

1711 New Hope Church Road

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To: oah.rules@oah.nc.gov

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(N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

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The Supervision Rule Changes require that any dentist who is not a practice owner be placed under "supervision" by another dentist. This is unreasonable and unjustified, as nearly all licensed dentists in this state hold unrestricted licenses and should not be subject to oversight by peers in order to practice.

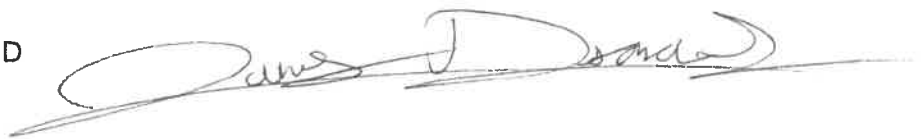
I object to these changes on the grounds that they:

- Exceed the authority granted to the Dental Board by the North Carolina General Assembly;
- Are unclear and ambiguous in scope;
- Are not reasonably necessary to implement or interpret North Carolina law; and
- Were not adopted in compliance with the procedural requirements of N.C. Gen. Stat. Chapter 150B, Article 2A, Part 2.

Pursuant to N.C. Gen. Stat. § 150B-21.3(b2), I respectfully request legislative review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,

Jamison Richards, DMD  
General Dentist  
909 Green Ash Lane  
Cary, NC 27513

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Best regards,



Justin Kauffman, DDS  
Dentist- Sardis Dental Care  
200 Farm Quarter Road  
Unit D  
Mooresville, NC 28115

August 28, 2025

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Best regards,

  
Collin Moore, DDS  
195 Winged Foot Ct  
Winston-Salem, NC 27107

August 28, 2025

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As a doctor in this state, I am writing to object to the North Carolina State Board of Dental Examiner ("Dental Board")'s adoption of two new rules, 21 NCAC 16F.0111 and 21 NCAC 16V.0103, and its amendment of 21 NCAC 16A.0101, which were voted on at the Dental Board's July 11, 2025 meeting (the "Supervision Rule Changes"). The Supervision Rule Changes were adopted by the Dental Board despite objections raised by commentators.

The proposed rule would require dentists in NC to be "supervised" unless the dentist is a practice owner. This is absurd since virtually all dentist licensees have unrestricted licenses and should not need to be "supervised" by other dentists. I object to the Supervision Rule Changes because they are outside the authority granted to the Dental Board by the North Carolina General Assembly, unclear and ambiguous, not reasonably necessary to implement or interpret North Carolina law, and because they were not adopted in accordance with N.C. Gen. Stat. Chapter 150B, Article 2A, Part 2.

As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,

  
Anna Grace Patrick, DDS  
6000 Grandover Village Rd  
High Point, NC 27407

[Date]

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

**RE: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

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As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,

*Jade Lim*, Associate Dentist  
[Name, Title, Home Address]

1015 adams park drive  
Charlotte, NC 28262

[Date]

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,

Octavia Miller Dentist  
[Name, Title, Home Address]  
500 W Trade St.  
Unit 1002  
Charlotte NC 28202



## Burgos, Alexander N

---

**From:** Adam Woll <adam.woll@wellsfamilydentalgroup.com>  
**Sent:** Thursday, August 28, 2025 8:22 AM  
**To:** rrc.comments; Rules, Oah  
**Subject:** [External] Dental Rule Amendment Overreach

You don't often get email from adam.woll@wellsfamilydentalgroup.com. [Learn why this is important](#)

**CAUTION:** External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

### Dear Members of the Rules Review Commission,

I am writing to respectfully express my concern regarding the proposed regulation that would require dentists practicing within group practices to be supervised holding the owner or lead dentist responsible for the professional conduct of their associates, including being subject to possible discipline. I request that these rules, 21 NCAC 16A.0101, 21 NCAC 16F.0111 and 21 NCAC 16V.0103 be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

With full respect for the Board's mission to protect the public and uphold the integrity of dentistry in North Carolina, I believe this proposal represents unnecessary overreach. Each dentist practicing in North Carolina is educated, trained, and licensed by the NC State Board to independently diagnose and treat patients. Furthermore, every dentist maintains their own professional liability coverage and is held to the same standards of competence and ethical conduct as their peers. Requiring additional supervision of licensed professionals simply because they practice in a group setting, undermines the autonomy granted by licensure. It also unfairly places undue risk and responsibility on practice owners for actions outside of their direct control. This approach does not enhance patient protection but rather discourages collaborative practice models that many communities rely upon for access to care.

Adam M Woll DDS  
303 Northwood Dr  
Raleigh NC 27609

--

**Adam Woll, DDS, FICOI, FAGD**  
**Chief Dental Officer, Wells Family Dental Group**  
[adam.woll@wellsfamilydentalgroup.com](mailto:adam.woll@wellsfamilydentalgroup.com)  
**919-266-5332**



August 28, 2025



**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

**RE: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

To the Rules Review Commission:

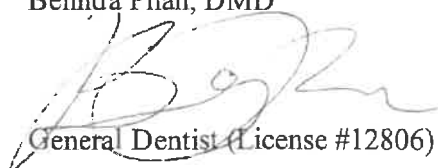
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As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,

Belinda Phan, DMD



General Dentist (License #12806)

8815 Fazio Dr, Wilmington NC 28411



August 28, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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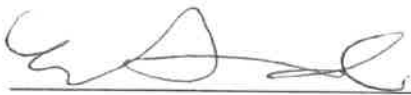
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Best regards,



Ellen Denmead DDS, General Dentist, 15009 Lucia Riverbend Hwy, Stanley, NC 28154

August 28, 2025

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Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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Best regards,

Jamal Bajwa, DMD, 503 dragby Ln Raleigh  
[Name, Title, Home Address] NC, 27603



## DENTAL CARE OF HAMPSTEAD

August 28, 2025

**RE: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

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Best regards,

Dr. Amanda Grass, DMD

15 West Ridge

Surf City, NC 28445

August 28, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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Best regards,



[Name, Title, Home Address]

Madison Fox DDS Lic #13008

Address: 414 W Peace St. Raleigh, NC 27603

August 28, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

**RE:     Objection to North Carolina State Board of Dental  
Examiners Rule Changes (N.C. Gen. Stat. §  
150B.21.3(b2) and 26 NCAC 05 .0110**

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Best regards,

  
Aaron J Groves DDS

408 Celtic Ash St.  
Sneads Ferry, NC, 28460

August 28, 2025

Via U.S. Mail and email

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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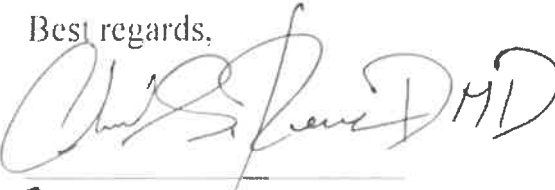
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Best regards,

  
Chad S. Reese DMD

805 Pine Valley Ct.  
Jacksonville, NC 28546



August 28, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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Best regards,

  
[Name, Title, Home Address]

JACOB HARTLEY DMD  
4701 STUBBINS HALL CT  
WAKE FOREST, NC 27587

August 28, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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Best regards,

A handwritten signature in dark ink, appearing to read 'Olutoyosi Coker', is written over a horizontal line.

Olutoyosi Coker, DMD

100 McNaughton Ct

Garner, NC 27529

**Michael Riccobene, DDS**

Riccobene Associates Family Dentistry  
3434 Kildare Farm Rd, STE 350  
Cary, NC 27518

**08-27-25**

**To:**

North Carolina Rules Review Commission  
1711 New Hope Church Road  
Raleigh, NC 27609

Dear Commissioners,

I'm writing to share concerns about the proposed rules 21 NCAC 16A.0101, 21 NCAC 16F.0111 and 21 NCAC 16V.0103 from the NC Dental Board, which would make practice owners liable for violations committed by other licensed professionals in their offices. I request that these rules, 21 NCAC 16A.0101, 21 NCAC 16F.0111 and 21 NCAC 16V.0103 be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision. I believe this rule doesn't meet several of the standards outlined in NCGS 150B-21.9.

**Authority:** The rule seems to go beyond what the General Assembly has authorized. Current laws already allow disciplinary action when a supervising dentist knowingly directs violations to the Dental Practice Act. This new rule would hold owners accountable even when they're not supervising or involved in the care, which feels like a stretch of the Board's authority.

**Clarity:** The following language is ambiguous.

(b) the dentist:

13 (ii) ratified the violation by express or implied consent or approval; or

HOW DO YOU DEFINE IMPLIED CONSENT?

14 (iii) knew or should have known of the violation committed by someone required to be under

15 the dentist's supervision or direction and permitted it to occur on a reoccurring basis or

16 following a previous similar violation.

HOW DO YOU DETERMINE “SHOULD HAVE KNOWN” OF THE VIOLATION.

17 (2) An owner of a dental practice or professional entity commits unprofessional conduct if reoccurring violations

18 under subsection (1)(a) occur at a facility, unless there had been a designation of a responsible dentist manager for the

19 facility prior to the violations.

The language around “reoccurring violations” is vague. It’s not clear whether this means repeated mistakes by one person or unrelated incidents across different providers and locations. That kind of ambiguity makes it hard for practice owners to know what’s expected or how to stay compliant. Additionally, the notion of implied consent is also ambiguous.

**Necessity:** Licensed dentists and hygienists are individually responsible for their clinical decisions. Holding an owner liable for someone else’s independent actions doesn’t improve patient safety—it just creates confusion and risk for business owners who aren’t involved in the treatment.

This rule could have serious consequences for multi-location practices and group dental models. For all these reasons, I respectfully ask the Commission to object to this rule and refer it for legislative review as set out in N.C.G.S. 150B-21.3. A more balanced and clearly defined approach would better serve both the public and the dental profession.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Riccobene".

Michael Riccobene, DDS

Caleb Crowe  
2039 Merrimac Dr Fayetteville NC 28304

8/24/2025

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

Re: Rules on Petitions that the State Board of Elections passed at its June 24<sup>th</sup> 2025 board meeting) ( 08 NCAC 22 .0104 (C).  
08 NCAC 22 .0105 PETITION CIRCULATORS.  
08 NCAC 22 .0305 GENERAL PURPOSE AND INTENT OF THE NEW PARTY)

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

I am objecting to:

08 NCAC 22 .0104 (C). (This goes far, and above current law and it will take much longer to petition. The intent of all political parties is understood to be to run and elect candidates to office and influence law. )

08 NCAC 22 .0105 PETITION CIRCULATORS. (This is a violation of an individual's First amendment rights, and it also places a new party at a disadvantage by making public a list of its volunteers. In addition, it will make it much more difficult circulating a petition as multiple individuals won't be able to circulate the same petition sheet. This makes it difficult when working a multi-person event where multiple counties attend.

08 NCAC 22 .0305 GENERAL PURPOSE AND INTENT OF THE NEW PARTY

This rule is confusing and sets up a situation where members of the two major parties can choose to keep a small party from every satisfying this requirement. The state board is very vague with this rule as to what it will accept and not accept and what if the state board does not agree with what the party has done or said to meet the requirement of general purpose and intent. This part of NC law is old and outdated and was meant to stop the spread of the Communist party and communism in America as I understand its history.

Furthermore, Multiple Parties have begun their petition drives and changing the rules in the middle of their drives is unfair to those parties.

It is with the above reasons and others that I am requesting a formal legislative review and delayed effective date should the rules review commission pass the rules as written.

Thank you for your consideration.  
Caleb Crowe *Caleb Crowe*

To the Rules Review Commission:

I am writing to object to the North Carolina State Board of Dental Examiner ("Dental Board")'s adoption of two new rules, 21 NCAC 16F.0111 and 21 NCAC 16V.0103, and its amendment of 21 NCAC 16A.0101, which were voted on at the Dental Board's July 11, 2025 meeting (the "Supervision Rule Changes"). The Supervision Rule Changes were adopted by the Dental Board despite objections raised by commentators.

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Best regards,



8/27/25

Gray McGinnis

Vice President, Government Relations

Association of Dental Support Organizations

## Burgos, Alexander N

---

**From:** Brett Wells <brett.wells@wellsfamilydentalgroup.com>  
**Sent:** Wednesday, August 27, 2025 2:04 PM  
**To:** rrc.comments; Rules, Oah  
**Subject:** [External] Dental Rule Amendment Overreach

You don't often get email from brett.wells@wellsfamilydentalgroup.com. [Learn why this is important](#)

**CAUTION:** External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

### Dear Members of the Rules Review Commission,

I am writing to respectfully express my concern regarding the proposed regulation that would require dentists practicing within group practices to be supervised holding the owner or lead dentist responsible for the professional conduct of their associates, including being subject to possible discipline. I request that these rules, 21 NCAC 16A.0101, 21 NCAC 16F.0111 and 21 NCAC 16V.0103 be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

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L Brett Wells DDS  
3009 Granville Dr  
Raleigh, NC 27609



**L. Brett Wells, DDS**

CEO / President

Wells Family Dental Group / LOREN

Mobile (919)360-0097 | [brett.wells@wellsfamilydentalgroup.com](mailto:brett.wells@wellsfamilydentalgroup.com)



## Burgos, Alexander N

---

**From:** Wes Hinson <wes.hinson@wellsfamilydentalgroup.com>  
**Sent:** Wednesday, August 27, 2025 2:10 PM  
**To:** rrc.comments; Rules, Oah  
**Subject:** [External] Dental Rule Amendment

You don't often get email from wes.hinson@wellsfamilydentalgroup.com. [Learn why this is important](#)

**CAUTION:** External email. Do not click links or open attachments unless verified. Report suspicious emails with the Report Message button located on your Outlook menu bar on the Home tab.

### Dear Members of the Rules Review Commission,

I am writing to respectfully express my concern regarding the proposed regulation that would require dentists practicing within group practices to be supervised holding the owner or lead dentist responsible for the professional conduct of their associates, including being subject to possible discipline. I request that these rules, 21 NCAC 16A.0101, 21 NCAC 16F.0111 and 21 NCAC 16V.0103 be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

With full respect for the Board's mission to protect the public and uphold the integrity of dentistry in North Carolina, I believe this proposal represents unnecessary overreach. Each dentist practicing in North Carolina is educated, trained, and licensed by the NC State Board to independently diagnose and treat patients. Furthermore, every dentist maintains their own professional liability coverage and is held to the same standards of competence and ethical conduct as their peers. Requiring additional supervision of licensed professionals simply because they practice in a group setting, undermines the autonomy granted by licensure. It also unfairly places undue risk and responsibility on practice owners for actions outside of their direct control. This approach does not enhance patient protection but rather discourages collaborative practice models that many communities rely upon for access to care.



#### Wes Hinson

Director of Operations

Wells Family Dental Group

mobile (919)349-5553 [wes.hinson@wellsfamilydentalgroup.com](mailto:wes.hinson@wellsfamilydentalgroup.com)



August 26, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

**RE: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

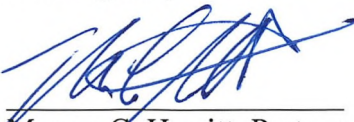
To the Rules Review Commission:

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I object to the Supervision Rule Changes because they exceed the authority granted to the Dental Board by the North Carolina General Assembly, are unclear and ambiguous, are not reasonably necessary to implement or interpret North Carolina law, and because they were not adopted in accordance with N.C. Gen. Stat. Chapter 150B, Article 2A, Part 2.

As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,



Marcus C. Hewitt, Partner  
Fox Rothschild, LLP

Susan F. Vick  
9642 NC Hwy 97W  
Rocky Mount, NC 27801

8/27/25

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina 27609

Re: Notice of Objection to Proposed Rule  
North Carolina State Board of Dental Examiners (NCSBDE)

Dear Members of the Rules Review Commission:

I am an attorney licensed to practice law in North Carolina, as well as a registered lobbyist. I have worked on issues emanating from rules imposed by the NCSBDE for many years and was previously a named plaintiff in a legal proceeding to require the NCSBDE to produce public records regarding passage rates for the NC dental exam and a testing preparatory course business offered by board members of the NCSBDE. I am also familiar with the U.S. Supreme Court case decided in 2015 regarding the anti-competitive behavior of the NCSBDE.

Please accept this letter as my objection to the proposed rule by the NC State Board of Dental Examiners that you will consider on Thursday, August 28, 2025. The proposed rule would impose an unprecedented layer of peer-to-peer dentist supervision by the NCSBDE, particularly as to multi-site dental practices.

This proposed rule is not necessary. There is already a long-standing, statutory mechanism in place to properly regulate dentists licensed in North Carolina as set forth in N.C.G.S. Sec. 90-41. This rule would saddle the NC dental industry with additional administrative costs that will be passed along to patients. Additionally, the rule takes aim at multi-site practices that are competition to traditional dental practices.

Dental practices with multiple sites can offer greater access for patients (office hours and open 5-days of the week); economies of scale/buying power relative to office supplies and services; and can offer young dentists graduating with school debt an entry into the profession that does not include having to incur more debt to purchase a retiring dentist's practice/building.<sup>1</sup> These concepts benefit patients by improving access and costs.

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<sup>1</sup> There are numerous practices for sale on the NC Dental Society's website  
<https://www.ncdental.org/member-center/classifieds-for-sale-lease>

**I request that these rules, 21 NCAC 16A.0101, 21 NCAC 16F.0111 and 21 NCAC 16V.0103 be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.**

Thank you for your attention to this matter.

Respectfully,

Susan F. Vick

August 25, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

**RE: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

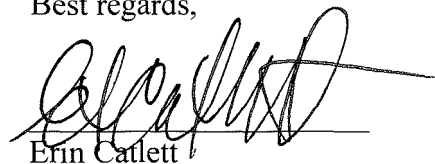
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As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,



Erin Catlett

August 25, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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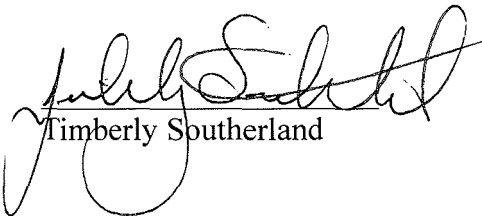
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Best regards,



Kimberly Southerland

August 25, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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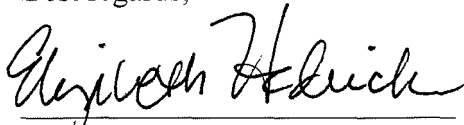
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As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,

  
Elizabeth Hedrick



Rules Review Commission

1711 New Hope Church Road,

Raleigh, North Carolina, 27609

[oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

Dear Members of the Rules Review Commission,

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With full respect for the Board's mission to protect the public and uphold the integrity of dentistry in North Carolina, I believe this proposal represents unnecessary overreach. Each dentist practicing in North Carolina is educated, trained, and licensed by the NC State Board to independently diagnose and treat patients. Furthermore, every dentist maintains their own professional liability coverage and is held to the same standards of competence and ethical conduct as their peers.

Requiring additional supervision of licensed professionals simply because they practice in a group setting, undermines the autonomy granted by licensure. It also unfairly places undue risk and responsibility on practice owners for actions outside of their direct control. This approach does not enhance patient protection but rather discourages collaborative practice models that many communities rely upon for access to care.

I urge the Board to reconsider this proposal and to reaffirm the principle that each licensed dentist in North Carolina is individually accountable for their own professional conduct. A fair and balanced regulatory framework should both protect the public and respect the independence of all licensed practitioners.

Thank you for your time, careful consideration, and continued service to the citizens of North Carolina.

Respectfully,

Pauline Cahill, DDS

*Pauline Cahill*



**.Comments Opposing Dental Board Rule Changes Regarding "Unprofessional Conduct" and Supervision of Dental Practices and Objection Requesting Legislative Review of any Adopted Rule**

**Submitted by Stephen W. Petersen, D.D.S., J.D.  
August 26, 2025**

Please accept this as my comments and objection to the proposed rule on supervision (21 NCAC 16V.0103). The proposed rule is not "reasonably necessary" as required by N.C. Gen. Stat. §§ 150B-21.9 and 21.10.

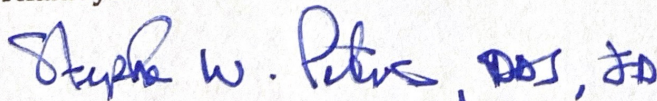
The basis of my opinion is that I graduated from both dental school and law school at the University of North Carolina at Chapel Hill and then took and passed the licensing board examinations in both disciplines. My understanding was that after successfully completing both of those licensing board examinations, I was qualified to practice dentistry without the need to be supervised by another dentist.

In addition, in both professions I practiced in a partnership arrangement. In my dental partnership, I was unaware of any statutory authority, with the exceptions of N.C. Gen. Stat. § 90-41(a)(21) and § 90-41(a)(6), that I had any obligation to supervise my partners or any appropriately licensed associates who worked for us.

The new proposed rule seems to impose an obligation on dental practice owners that does not exist in the current statutes. If the Board of Dental Examiners wishes to expand the obligations of dental practice owners, the Board should proceed through the legislature rather than attempt to make an end run through the Rules Review Commission.

If the Commission disagrees with my opinion, and adopts the proposed rule, please accept this letter as my objection under NCGS §§ 150B-21.3(b) and (b)(3) requesting review of the new rule by the legislature.

Thank you.

A handwritten signature in blue ink that reads "Stephen W. Petersen, D.D.S., J.D." with a stylized flourish at the end.

Stephen W. Petersen, D.D.S., J.D.



Alexis Pasca

141 Park at North Hills Street Apt. 455  
Raleigh NC 27609

August 26<sup>th</sup>, 2025

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

**Re: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

To the Rules Review Commission:

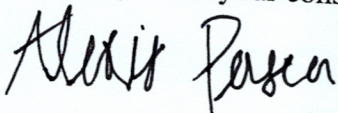
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Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.



Alexis Pasca



Harrison Benson

104 E Rowan Street  
Raleigh NC 27609

August 26<sup>th</sup>, 2025

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

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Thank you for your consideration.

Harrison Benson

A handwritten signature in black ink, appearing to read "HBenson", with a long horizontal flourish extending to the right.



Katherine Benson  
104 E Rowan Street  
Raleigh NC 27609

August 26<sup>th</sup>, 2025

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

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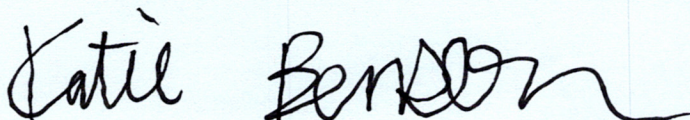
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Thank you for your consideration.

Katherine Benson

A handwritten signature in black ink that reads "Katie Benson". The signature is written in a cursive, flowing style.



Kamryn Earle

500 W. North Street  
Raleigh NC 27603

August 26<sup>th</sup>, 2025

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

**Re: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

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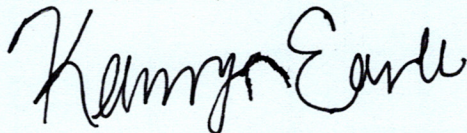
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Thank you for your consideration.

A handwritten signature in black ink that reads "Kamryn Earle". The signature is written in a cursive, flowing style.

Kamryn Earle



Kendall T. Conger  
9 N Harrington Street  
Raleigh, NC 27603

August 26<sup>th</sup>, 2025

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

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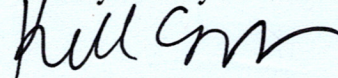
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Thank you for your consideration.



Kendall Conger



Dr. L. Kendall Conger  
422 Marlowe Road  
Raleigh, NC 27609

August 26<sup>th</sup>, 2025

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

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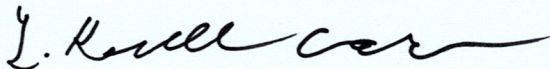
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Dr. L. Kendall Conger



Nelson Freeman

116 N West Street Suite 240  
Raleigh NC 27603

August 26<sup>th</sup>, 2025

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

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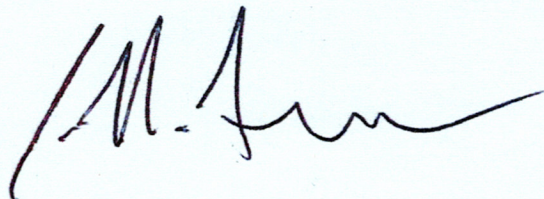
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Thank you for your consideration.

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Nelson Freeman



Peyton Townsend

316 Cooke Street  
Raleigh NC 27601

August 26<sup>th</sup>, 2025

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

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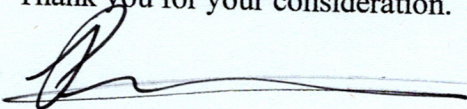
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Peyton Townsend



Parker Townsend

316 Cooke Street  
Raleigh NC 27601

August 26<sup>th</sup>, 2025

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To the Rules Review Commission:

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I object to the Supervision Rule Changes because they are outside the authority granted to the Dental Board by the North Carolina General Assembly, unclear and ambiguous, not reasonably necessary to implement or interpret North Carolina law, and because they were not adopted in accordance with N.C. Gen. Stat. Chapter 150B, Article 2A, Part 2. As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Members of the Commission:

I request that the above rule(s) be reviewed in the upcoming legislative session as set out in N.C.G.S. 150B-21.3. I further request that the rule(s) be subject to a delayed effective date as set out in that same provision.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Parker Townsend", with a long horizontal flourish extending to the right.

Parker Townsend



Susan Conger  
422 Marlowe Road  
Raleigh, NC 27609

August 26<sup>th</sup>, 2025

N.C. Rules Review Commission  
1711 New Hope Church Rd.  
Raleigh, NC 27609

**Re: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

To the Rules Review Commission:

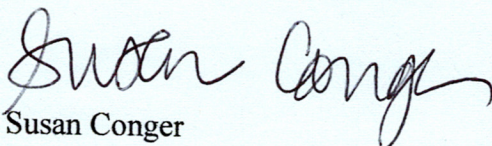
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Thank you for your consideration.

  
Susan Conger



August 27, 2025

**Via U.S. Mail and email**

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

**RE: Objection to North Carolina State Board of Dental Examiners Rule Changes (N.C. Gen. Stat. § 150B.21.3(b2) and 26 NCAC 05 .0110**

To the Rules Review Commission:

As a doctor in this state, I am writing to object to the North Carolina State Board of Dental Examiner ("Dental Board")'s adoption of two new rules, 21 NCAC 16F.0111 and 21 NCAC 16V.0103, and its amendment of 21 NCAC 16A.0101, which were voted on at the Dental Board's July 11, 2025 meeting (the "Supervision Rule Changes"). The Supervision Rule Changes were adopted by the Dental Board despite objections raised by commentators.

The proposed rule would require dentists in NC to be "supervised" unless the dentist is a practice owner. This is absurd since virtually all dentist licensees have unrestricted licenses and should not need to be "supervised" by other dentists. I object to the Supervision Rule Changes because they are outside the authority granted to the Dental Board by the North Carolina General Assembly, unclear and ambiguous, not reasonably necessary to implement or interpret North Carolina law, and because they were not adopted in accordance with N.C. Gen. Stat. Chapter 150B, Article 2A, Part 2.

As authorized by N.C. Gen. Stat. Section 150B-21.3(b2), I request review of the Supervision Rule Changes by the North Carolina General Assembly.

Best regards,



Forrest A. Norman III, DDS

Dentist

6232 Sharon Acres Rd.

Charlotte, NC 28210

08/27/2025

Rules Review Commission  
1711 New Hope Church Road  
Raleigh, North Carolina, 27609,

To: [oah.rules@oah.nc.gov](mailto:oah.rules@oah.nc.gov)

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Best regards,

  
\_\_\_\_\_  
Dr. Brian Milley DMD

8815 Fazio Drive, Wilmington, NC, 28412