
From: Robyn Klose <robyn@ncdentalu.com>

Sent: Tuesday, October 28, 2025 10:45 AM

To: Bobby White <bwhite@ncdentalboard.org>; Betty Sines <bsines@ncdentalboard.org>

Subject: Request for Temporary Rule Change and Course Approval - NC Dental U Radiology Instructor Certification Course

Dear Mr. White and Members of the Board,

I hope this message finds you well. On behalf of NC Dental U, I am submitting the attached materials for your review and consideration.

We are requesting the Board's review and approval of a temporary rule change under G.S. 150B-21.1 that would allow AGD PACE approved providers to offer the *Dental Radiology Instructor Certification Course*. As outlined in the attached proposal, there are currently no CODA accredited institutions in North Carolina including UNC, ECU, HPU, or any community college able to provide this course, creating a statewide shortage of qualified radiology instructors for proprietary dental assisting programs.

NC Dental U has been an AGD PACE approved provider since 2016, with current approval extending through October 31, 2029 (Provider ID #355240), and is prepared to begin offering this certification course immediately upon Board approval.

Attached for your review are:

1. Executive Summary: Radiology Instructor Certification Proposal
2. Formal Letter Request for Temporary Rule Change and Course Approval
3. Course Syllabus & Learning Outcomes
4. AGD PACE Provider Approval Letter (2025-2029)

All instructional materials, including the instructor workbook, presentation slides, and final examination, are available for Board review upon request.

Thank you for your time and consideration. Please don't hesitate to contact me if any additional documentation or clarification is needed during the review process.

Warm regards,

Robyn Klose

Director | NC Dental U

Provider ID #355240 | AGD PACE Approval 2016–2029

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Robyn Klose

Founder/Director/RDH



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NC DENTAL U – EXECUTIVE SUMMARY

Request for Temporary Rule Change and Course Approval Radiology Instructor Certification Course

Purpose of Request

NC Dental U respectfully requests that the North Carolina State Board of Dental Examiners:

1. Adopt a temporary rule change under G.S. 150B-21.1 to allow AGD PACE approved providers to offer the Dental Radiology Instructor Certification Course; and
2. Review and approve NC Dental U's proposed Radiology Instructor Certification Course for Proprietary School Instructors for immediate implementation under this temporary authority.

Background and Current Challenge

Under 21 NCAC 16H .0105(b)(6), instructors of dental radiography must either be employed by or certified through a CODA accredited institution.

Currently, no CODA accredited dental school or institution in North Carolina including UNC, ECU, HPU, or any community college is able to offer the required Dental Radiology Instructor Certification Course. This has created a statewide shortage of qualified instructors for proprietary dental assisting programs and an immediate barrier to compliance with Board requirements.

About NC Dental U

- AGD PACE approved provider since 2016, with approval extending through October 31, 2029 (Provider ID #355240).
- PACE approval reflects adherence to national standards in course design, instructor qualifications, and continuing education quality assurance.
- Experienced in delivering Board recognized continuing education programs across North Carolina.

Proposed Temporary Rule Addition

(C) An instructor who has successfully completed a Board approved Dental Radiology Instructor Certification Course offered by an AGD PACE approved provider, provided the course syllabus, learning outcomes, and instructor credentials are submitted to and approved by the Board.



Radiology Instructor Certification Course Overview

- Aligns fully with the didactic and laboratory standards in 21 NCAC 16H .0105(b)(2).
- Focuses on radiation safety, digital imaging, error recognition, and corrective instruction techniques.
- Instructor requirement: minimum three (3) years of experience teaching dental radiology in a CODA accredited or Board-recognized program.
- Course materials, objectives, and assessments are prepared and available for Board review.

Justification for Temporary Rulemaking

1. Imminent need: to maintain continuity of instructor certification statewide.
2. Regulatory gap: no active CODA based course currently available.
3. Board oversight preserved: all course content and instructors submitted for prior approval.

Immediate Readiness

NC Dental U is ready to begin offering this certification course upon approval. This proposal ensures public safety, educational quality, and access to qualified instruction supporting both the dental workforce and compliance statewide.

Contact

Robyn Klose

Director | NC Dental U

Provider ID #355240 | AGD PACE Approval 2016 – 2029

877-432-3555 | robyn@ncdentalu.com



NC Dental U

Date: October 28, 2025

To:

North Carolina State Board of Dental Examiners
Attn: Radiology Committee and Executive Director
2000 Perimeter Park Drive, Suite 160
Morrisville, NC 27560

**Re: Request for Temporary Rule Change and Course Approval – NC Dental U
Radiology Instructor Certification Course**

Dear Members of the Board and Radiology Committee,

On behalf of NC Dental U, I respectfully submit this combined request for:

1. A temporary rule change under G.S. 150B-21.1 to allow AGD PACE approved providers to offer the Dental Radiology Instructor Certification Course; and
2. Board review and approval of the proposed NC Dental U Radiology Instructor Certification Course for Proprietary School Instructors under the modified rule.

****Background and Immediate Need****

Under the current rule 21 NCAC 16H .0105(b)(6), instructors of dental radiography must either be employed by a CODA accredited institution or have received certification to teach dental radiography from one.

At this time, there is no CODA accredited dental school or institution in North Carolina including UNC, ECU, HPU, or any community college that is able to offer the required Dental Radiology Instructor Certification Course. This has resulted in a statewide shortage of qualified instructors for proprietary dental assisting programs and an immediate barrier to compliance with Board requirements.

****Proposed Temporary Rule Amendment****

To address this urgent gap, NC Dental U proposes that the Board adopt the following temporary amendment to 21 NCAC 16H .0105(b)(6) (additions in bold):

- (6) The didactic and laboratory portions of the course shall be taught by:
- (A) an instructor of dental radiography at an institution accredited by the Commission on



Dental Accreditation (“CODA”), or

(B) an instructor who has received certification to teach dental radiography from a CODA accredited institution, and has completed three hours of continuing education in the area of radiology every other year, **or**

** (C) an instructor who has successfully completed a Board-approved Dental Radiology Instructor Certification Course offered by an AGD PACE-approved provider, provided the course syllabus, learning outcomes, and instructor credentials are submitted to and approved by the Board. **

This temporary rule would remain in effect until a permanent rule can be adopted through the standard rulemaking process, allowing immediate relief while maintaining full Board oversight.

****About NC Dental U and Course Design****

NC Dental U has been an AGD PACE approved provider since 2016, with current approval extending through October 31, 2029 (Provider ID #355240). PACE approval confirms adherence to rigorous national standards in continuing dental education covering course design, instructor qualifications, evaluation methods, and continuous program improvement.

Our proposed Radiology Instructor Certification Course is designed to:

- Prepare educators to teach dental radiography effectively within proprietary school environments;
- Align fully with the didactic and laboratory standards defined in 21 NCAC 16H .0105(b)(2);
- Emphasize radiation safety, digital imaging, error recognition, and corrective instruction techniques; and
- Require all instructors to possess a minimum of three (3) years of experience teaching dental radiology in a CODA accredited or Board recognized program.

All course materials, objectives, and evaluations are available for submission and review upon request.

****Justification Under G.S. 150B-21.1 (Temporary Rulemaking)****

This request satisfies the statutory criteria for temporary rulemaking because:

1. There is an imminent need to ensure the continuity of dental radiography instructor certification in North Carolina.
2. The absence of any active CODA based instructor certification course has created a significant regulatory and workforce barrier.
3. The proposed temporary rule maintains Board review and approval for all course content and providers, preserving educational integrity and public protection.



****Request for Board Action****

NC Dental U respectfully requests that the Board:

1. Adopt a temporary rule change under G.S. 150B-21.1, allowing Board approved AGD PACE providers to offer the Dental Radiology Instructor Certification Course; and
2. Review and approve NC Dental U's proposed course for implementation immediately upon rule adoption.

NC Dental U is prepared to begin offering this certification course immediately upon approval, ensuring that proprietary schools and their faculty have access to a compliant, high-quality pathway for radiology instructor certification.

****Conclusion****

This proposal upholds the Board's commitment to public safety, educational quality, and workforce readiness, while providing a practical solution to an urgent statewide need. We appreciate your thoughtful consideration and welcome the opportunity to present this proposal at your next scheduled Board or Committee meeting.

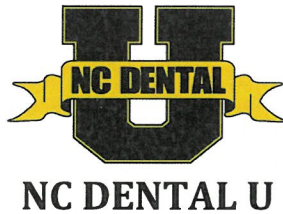
Respectfully submitted,

Robyn Klose

Director, NC Dental U

Provider ID #355240 | AGD PACE Approval: 2016 – 2029

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Dental Radiology Instructor Certification Course

Syllabus, Learning Outcomes & Grading Summary

Course Overview

The NC Dental U Dental Radiology Instructor Certification Course is designed to prepare qualified dental professionals to teach dental radiography in proprietary and private dental assisting programs. This course emphasizes the didactic, laboratory, and instructional methods necessary to safely and effectively educate future dental assistants in digital radiography, radiation biology, image evaluation, and error correction.

Course Duration: 15 hours total (7 hours lecture / 8 hours lab)

Delivery Method: In-person and hands-on instruction

Course Type: Continuing Education ; Instructor Certification

Provider: NC Dental U, AGD PACE Provider #355240 (Approved 2016–2029)

Learning Objectives

- Demonstrate advanced knowledge of dental radiographic techniques, including paralleling and bisecting methods.
- Identify and explain common radiographic errors and instruct students on proper corrective actions.
- Apply principles of radiation biology and protection, including ALARA and infection-control standards.
- Evaluate full-mouth series (FMX) for diagnostic quality, exposure accuracy, and anatomical identification.
- Integrate educational methodology for teaching dental radiology in classroom and laboratory environments.
- Demonstrate competency in digital imaging systems, sensor handling, and quality assurance.
- Apply North Carolina Board standards and rules relevant to dental radiography instruction and certification.



Instructor Qualification Requirement

All instructors must have a minimum of three (3) years of experience teaching dental radiology in a CODA-accredited or Board-recognized program and must maintain current continuing education in radiology and infection control.

Grading Criteria (Modeled After UNC Radiology Certification Standards)

To successfully complete the course, participants must achieve a minimum passing score of 80% in each component:

Component	Description	Minimum Passing Score
Screening FMX Evaluation	Demonstrate accurate exposure and diagnostic interpretation of a full-mouth radiographic series	80%
Lecture / Written Examination	Assess knowledge of radiation safety, technique principles, and instructional methodology	80%
Clinical Evaluation FMX	Perform and evaluate a full-mouth series on a manikin to demonstrate teaching and technical proficiency	80%

Course Outcome

Upon successful completion, participants will receive a Dental Radiology Instructor Certification recognizing them as qualified to teach dental radiography in North Carolina proprietary and Board-recognized dental assisting programs.



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September 19, 2025

Provider ID# 355240
NC Dental U
Robyn Klose
123 Capcom Avenue Ste 4
Wake Forest, NC 27587

Via email: robynrdh@gmail.com

Dear Ms. Klose:

Congratulations! On behalf of the Academy of General Dentistry (AGD), I am pleased to inform you that **NC Dental U**, provider ID # **355240**, has received approval from the AGD Program Approval for Continuing Education (PACE) Council. Please use your provider ID number on all correspondence. The approval period extends from **11/1/2025 to 10/31/2029**. Check your listing on the [Find a PACE Approved Provider](#) page of the AGD Website. E-mail PACE@agd.org if there are any corrections or updates to your information. The PACE Council noted the following concerns with your application and will expect to see improvements in each of the areas listed below if you reapply for approval in the future:

Sample Documentation: The council expects to see completed samples of all requested documentation, including an instructor affidavit of image authenticity, in future applications. Completed samples should be from courses completed in the past twelve months and listed on your list of courses.

Please review the current [PACE Program Guidelines](#) available on the AGD Website. PACE Standard XI requires all PACE providers to submit CE credits for **AGD member** attendees to the AGD within 30 days of course completion. **Reminder, all approved providers must submit CE through the AGD Website.** To read more about this please log on to www.agd.org. Enter **355240** as your username/member as your username/member ID and use the password you were assigned when you completed your application. Next, click on the word Education on the blue horizontal menu and then *PACE -Approved Providers* under the **LEARN** heading. In the righthand menu you can choose to upload a CSV roster or submit a roster online. You can review the three options for submitting CE to the AGD on the [PACE Provider Resources](#) page. If you have questions about online rosters, CSV file uploads or API submissions, please email the AGD at PACE@agd.org

The AGD requires that you use the AGD PACE Logo and the following approval statement on all publicity and attendance verification forms:



NC Dental U
Nationally Approved PACE Program Provider for FAGD/MAGD credit.
Approval does not imply acceptance by
any regulatory authority or AGD endorsement.
11/1/2025 to 10/31/2029.
Provider ID# 355240

Once logged onto the AGD website you can [download the AGD PACE logo](#) from the PACE area of the website. Please reference the [AGD PACE Logo Usage Guidelines](#) to ensure you use the logo correctly. Approved providers have permission to use the AGD PACE Logo on their publicity and attendance verification materials. The AGD PACE logo and approval statement cannot be included on any other materials developed by the provider. Under no circumstance do approved providers have permission to use the AGD logo on any materials. Using the AGD logo is a trademark violation and could result in withdrawal of approval. The terms "accreditation," "accredited" or "certified" must not be used in conjunction with PACE approval.

Approved providers have the obligation, if requested, to allow one monitor at least one time per year to monitor one of their programs. Details on the AGD monitoring program can be found in the PACE Program Guidelines.

AGD e-mails approval renewal notices to providers approximately eleven months and six months before their expiration date. All nationally approved PACE Providers are required to pay an annual non-refundable maintenance fee in addition to the non-refundable application fee. Providers will receive an e-mail invoice for this fee approximately 90 days prior to each due date. To learn more about PACE visit the PACE section of AGD Website often. This section is designed to help you manage your program.

Thank you again for your commitment to providing quality continuing dental education.

Sincerely,

Ronald D. Giordan, DDS, MAGD

Ronald D. Giordan, DDS, MAGD

Chair, Program Approval for Continuing Education (PACE) Council