



State of North Carolina

Department of Justice
PO Box 629
Raleigh, North Carolina
27602

ROY COOPER
ATTORNEY GENERAL

MEMORANDUM

June 13, 2016

TO: Rules Review Commission
Office of Administrative Hearings

FROM: Lauren T. Earnhardt *Lauren J. Earnhardt*
Assistant Attorney General

RE: Agency Response

The Criminal Justice Education and Training Standards Commission has taken very thoughtful consideration in drafting this rule and was asked to provide numerous versions to several members of the General Assembly who provided feedback which has been incorporated.

While this agency agrees with Commission counsel that the proposed rule does repeat portions of 17C-10.1, this repetition is necessary for the law enforcement officers, agencies, and applicants for certification that our agency regulates. This portion of the public, use our rules as a reference guide for how much training is required for an applicant and it would be cumbersome and impractical to require either the law enforcement agency or potential applicant to refer back to the statute for their training requirement. Also, for consistency sake, all rules surrounding this proposed rule give very specific requirements/guidelines to applicants and agencies. A bare bones rule just doesn't seem to fit when viewing the surrounding rules.