

Burgos, Alexander N

From: Rules, Oah
Sent: Monday, June 12, 2023 8:36 AM
To: Ascher, Seth M
Cc: Burgos, Alexander N
Subject: FW: [External] NC Proposed Ruling Objection Letter

From: Juily Walker <juilyelizabeth@yahoo.com>
Sent: Friday, June 9, 2023 10:25 PM
To: Rules, Oah <oah.rules@oah.nc.gov>
Subject: [External] NC Proposed Ruling Objection Letter

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To whom it may concern:

I am reaching out to express my objection to the proposed ruling 21 NCAC 16H. DENTAL RADIOLOGY COURSE AND EXAMINATION REQUIREMENTS. This ruling would require a 6:1 student to teacher ration instead of the current 15:1 ratio.

Currently I am teaching my 8th semester as a dental assistant instructor. The course I teach has a maximum capacity of 15 students and we meet for 10 weeks every Saturday. Each class consists of a 4 hour lecture and a 4 hour clinic with the exception of class 9, where students have an all day clinic. In addition, class 2 is dedicated to learning all things dental radiology. By the end of the course, students will have taken a minimum of 200 X-rays and completed 96 hours of job shadowing and training.

Every class I teach as a solo instructor has a strict checklist and guide. This ensures each student is comprehending every lesson and practicing essential hands on skills. One of the most important of these skills is taking X-rays and understanding dental radiology. Students are given the opportunity to learn both conventional and digital X-rays. By the end of the course each student has the ability to take diagnostic quality X-rays and is prepared to work in the dental field.

Working as a dental assistant for the past 10 years has enabled me to become extremely organized and an exceptional multitasker. With these skills, I am able to manage each student and their needs to ensure they are fully prepared to start their dental career. Under the current student to teacher ratio I have had the opportunity to teach 120 dental assisting students. If the student to teacher ratio is changed this will dramatically decrease class size and limit how many students I am able to help each year. I ask that you reconsider this proposal as it will not change the quality of the class I teach; it will only limit the number of students who have access to this course.

Please do not hesitate to reach out if I can be of any assistance regarding this decision. Thank you for your consideration. I look forward to hearing your reply.

Best regards,

Juily Walker

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Burgos, Alexander N

From: Rules, Oah
Sent: Wednesday, June 7, 2023 3:58 PM
To: Ascher, Seth M
Cc: Burgos, Alexander N
Subject: FW: [External] Accelerated Academy: NC Proposed Ruling Objection Letter
Attachments: NC Proposed Ruling Objection Letter.pdf

From: Elizabeth Donahue <elizabeth@acceleratedacademy.us>
Sent: Wednesday, June 7, 2023 3:55 PM
To: Rules, Oah <oah.rules@oah.nc.gov>; dauna@brocklerlawfirm.com
Subject: [External] Accelerated Academy: NC Proposed Ruling Objection Letter

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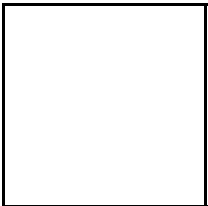
Hello,

Please find my objection letter attached to this email.

Best,

Elizabeth Donahue

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Accelerated Academy

| DENTAL ASSISTING

Elizabeth Donahue
133 Aspen Square, Ste. H
Denham Springs, LA 70726
844-727-3755

05/05/23

NC Office of Administrative Hearings
1711 New Hope Church Rd
Raleigh, NC 27609

VIA EMAIL: oah.rules@oah.nc.gov
dauna@brocklerlawfirm.com

To Whom it May Concern:

I am writing to ask for a review of the proposed ruling 21 NCAC 16H.0105 DENTAL RADIOLOGY COURSE AND EXAMINATION REQUIREMENTS made by the North Carolina Board of Dental Examiners, which is currently in the public notice phase.

I have concerns regarding the newly proposed ruling and requirements. Accelerated Academy hires instructors who have been in Dental Assisting for over twenty years but do not hold the UNC Chapel Hill Radiology Certification. The availability of this course is concerning as the course is only held one time per year and Accelerated Academy is only permitted to enroll three instructors per course. Accelerated Academy would love to have all of our instructors certified by the North Carolina Board of Dental Examiners' requirements, but how could we fulfill this only being able to send three instructors at a course held one time per year? If the need to hold the UNC Chapel Hill Radiology Certification is going to be an instructor requirement for licensing, please open additional class dates throughout the year and allow for more than three instructors to be enrolled.

Please consider my concerns regarding the UNC Chapel Hill Radiology Course or revisit including other Radiology Certification programs for instructors to attend.

Thank you for your time,

Elizabeth Donahue
Communications Manager – North Carolina
Phone: 225-335-8283
Email: administration@acceleratedacademy.us

Burgos, Alexander N

Subject: FW: [External] Rulemaking Coordinator of Board of Dental Examiners OBJECTION letter
Attachments: NC proposed ruling OBJECTION letter.docx

From: Angie Leblanc <angie@acceleratedacademy.us>
Sent: Tuesday, May 30, 2023 11:21 AM
To: dauna@brockerlawfirm.com; doug@brockerlawfirm.com
Cc: Ascher, Seth M <seth.ascher@oah.nc.gov>
Subject: [External] Rulemaking Coordinator of Board of Dental Examiners OBJECTION letter

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I respectfully submit this letter for review of the 21 NCAC 16H .0105 Proposed ruling currently in the public notice phase.

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Angie LeBlanc
Compliance Manager
225-480-0033
angie@acceleratedacademy.us
www.acceleratedacademy.us

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I am writing to ask for a review of the proposed ruling 21 NCAC 16H.0105 DENTAL RADIOLOGY COURSE AND EXAMINATION REQUIREMENTS made by the North Carolina Board of Dental Examiners, which is currently in the public notice phase.

The concern in reading this proposed ruling is that there are still extremely vague portions that do not give adequate direction on how to achieve the requirements being put in place. All of my concerns revolve around the instructors teaching the proposed ruling. The qualifications of an instructor are only vaguely stated. (6) (A) revolves around CODA-accredited school courses; (6) (B) is what is extremely vague for proprietary schools that also would like to set our students up for success as dental assistants in NC. I will break down (6)(B) in portions below:

- 1) An instructor who has “taken and passed a radiology instructor’s certification course” taught by an instructor of dental radiography at a CODA-accredited institution..... What constitutes a radiology instructor’s certification course: what content makes up this course? Is there a list of approved schools or courses offering this specific course that can be supplied by the board? If the board is requiring this, should it regulate or monitor who and how often these courses are offered so that this requirement can be met?
Suggestions: A list of approved courses that meet this description posted on the board’s website. Board review of the existing courses to make sure that courses are accessible often and following the vision of the board so that it is delivering what is required. Clear description of what this course entails so more CODA programs can offer a board approved course to the public. Enforcement that programs offer this course timely to meet demand in attendance.
- 2) “and has completed three hours of continuing education in the area of radiology every other year.” Who maintains these records? Is this to be kept in an instructor’s file and “produced upon the request of the board”? What constitutes an approved



CE course? Should the Board provide a description of what the course should be or provide a list of approved sponsors/courses for the acceptable CE hours ... or can the existing CE hours descriptions and lists that are currently on the board website under dentists and dental hygienists be used? Suggestion: clarify where to find a list of approved courses, where to store this information, and provide a description of what constitutes an approved course.

I am writing these objections from the perspective of a proprietary school operating dental assisting schools in your state that give students an alternative opportunity to longer, often more costly degree programs, to gain meaningful employment. We are a needed facet in this industry; but feel the Board has been extremely detailed in what they expect the students to know regarding radiology, but very vague in helping alternative programs to CODA schools provide quality instruction of the very content it is trying to protect and disseminate. Those following (6)(B) of this ruling need clear guidance on how to comply with the ruling.

Respectfully submitted,

Angie LeBlanc

Angie LeBlanc
Compliance Manager
Accelerated Academy, LLC



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The concern in reading this proposed ruling is that there is not enough opportunity for an instructor to attend and pass a radiology instructor's certification course to meet the required 6:1 ratio. The only approved instructor radiology certification course is the *Educational and Clinical Application for Proprietary Radiology Educators* at UNC-Chapel Hill. There is limited opportunity for proprietary schools to enroll instructors in this course, to stay compliant with the board's requirements. Due to UNC-Chapel Hill not providing set dates for when the course is offered, it is difficult to enroll instructors in a timely manner. UNC-Chapel Hill limits seat availability to 3 people, per course. Only offering the course once a year, the last-minute announcement of the course date and the lack of seat availability hinders institutions from enrolling the necessary number of instructors to meet the 6:1 ratio. I would propose that UNC be held accountable to offer more than one course a year to meet demand or post the course dates in advance and offer a larger class capacity.

The requirement (3) states

"The laboratory portion of the course shall have no more than six students per instructor..."

The requirement (6B) states

"An instructor who has taken and passed a radiology instructor's certification course taught by an instructor of dental radiography at a CODA-accredited institution, and has completed three hours of continuing education in the area of radiology every other year."

I would like to propose for the student: teacher ratio to be re-evaluated based off the lack of opportunity for teachers to attend an approved radiology course.



I am writing objections from the perspective of a proprietary school operating dental assisting schools in your state. Accelerated Academy has been successfully hosting dental assisting schools in the state of North Carolina since 2019. North Carolina has been one of the fastest growing states in our company due to the increased interest of doctors wanting to host our program to assist with the need of hiring dental assistants. Over the past four years, we have invested all attention to our operations to ensure we are providing an educational lecture environment, with a hands-on clinic approach with a 15:1 ratio of students to instructors while staying in compliance and ensuring our students have the necessary skills to work as a dental assistant.

We are a needed facet in this industry but feel the Board has proposed guidelines that will make it impossible for us to have enough instructors, with the right requirements to teach the number of students that enroll in our program throughout the state of North Carolina.

Respectfully submitted,

Emily Jenks