



NORTH CAROLINA COMMUNITY COLLEGE SYSTEM
R. Scott Ralls, Ph.D.
President

August 7, 2015

VIA EMAIL AND US MAIL
Nadine Pfeiffer, Rule-making Coordinator
Division of Health Service Regulation
2701 Mail Service Center
Raleigh, NC 27699-2701

**RE: Proposed Adoption of Health Care Personnel Registry Rule
10A NCAC 130 Nurse Aide I Registry**

Dear Ms. Pfeiffer:

Please accept this letter in support of the proposed rule requiring state-approved training in order to be listed on the Nurse Aide I Registry.

First and foremost, we applaud the rule’s impact on public safety. Without question, Nurse Aides are playing an increasingly vital role in health care. This is especially true for elderly and disabled Americans. Mandatory training will help ensure that such caregivers can perform necessary skills—rather than simply memorizing the proper steps to challenge the state exam. The proposed rule will also bring North Carolina in line with the overwhelming majority of other states that have adopted similar requirements.


We also express our support because of the rule’s potential to reduce consumer complaints regarding unlicensed “test prep” programs. Since the Proprietary Board’s establishment in 2012, we have received numerous complaints that typically originate from the following scenario:

A student wishing to re-enter the workforce pays several hundred dollars to an unlicensed Nurse Aide test-prep school. After completing the program and passing the state exam, the student applies for work; seeks to further their education at a community college or university; or attempts to register with NCBON to take the Nurse Aide II exam. The student learns that they are required to complete state-approved Nurse Aide training. The student then requests and is denied a refund. The student eventually contacts DHHS or our office to complain, but we have no oversight over such unlicensed programs.

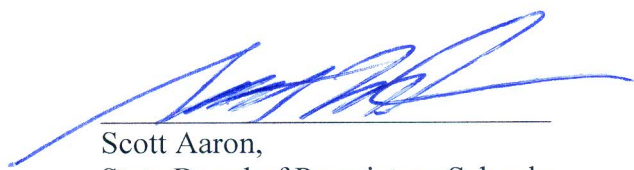
We anticipate the proposed rule will draw criticism from unlicensed and unapproved Nurse Aide “test-prep” programs. However, it is the position of the State Board of Proprietary Schools that these businesses fall under the licensing requirements of Article

8, Chapter 115D of the General Statutes. Regardless, any such opposition is easily rebutted by the proposed rule's overriding positive impact on public safety.

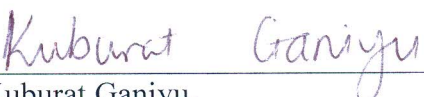
Sincerely,



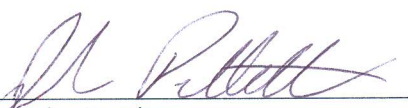
Bob Hodge, Chair
State Board of Proprietary Schools



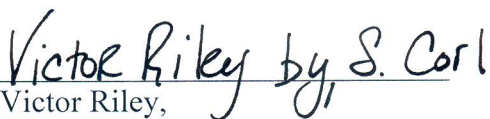
Scott Aaron,
State Board of Proprietary Schools



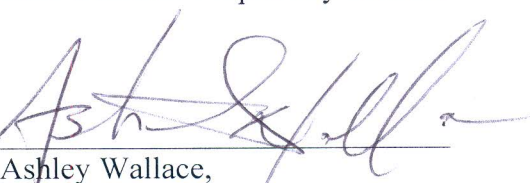
Kuburat Ganiyu,
State Board of Proprietary Schools



Dr. John Pettitt
State Board of Proprietary Schools



Victor Riley,
State Board of Proprietary Schools



Ashley Wallace,
State Board of Proprietary Schools