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October 14, 2025

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Shanah Black  
Rulemaking Coordinator  
Division of Health Service Regulation  
Via email: [dhsr.rulescoordinator@dhhs.nc.gov](mailto:dhsr.rulescoordinator@dhhs.nc.gov)

Re: Public Comment submitted by the North Carolina Nurses Association regarding proposed Radiation Protection Rules 10A NCAC 15 Section .0600

Dear Ms. Black:

Pursuant to G.S. §150B-21.3A, the North Carolina Nurses Association (NCNA) respectfully objects to 10A NCAC 15.0601, 10A NCAC 15.0602, and 10A NCAC 15.0604 as currently drafted.

While we fully support and appreciate efforts to provide for safe utilization of radiation equipment, NCNA was surprised to learn that rules were being proposed that entirely exclude some Advanced Practice Registered Nurses (APRNs) from utilizing fluoroscopy in the future, despite it being within their current scope of practice. We were equally surprised to learn that the draft rules would place requirements on Nurse Practitioners over and above both current statute and N.C. Board of Nursing rules.

Regulation of APRNs and determination of their scope of practice does not fall within the purview of the N.C. Radiation Protection Commission. It is our hope that these proposed changes were oversights and that the Division of Health Service Regulation will consult with the Board of Nursing to bring the proposed rules back in line with current APRN practice in our state.

In addition, the proposed changes would reduce access to quality care and increase costs due to the significant changes to how many hospitals and ambulatory centers already routinely utilize APRNs. Current practice has an established record of efficacy and safety for patients. During a time of unprecedented healthcare costs, access gaps, and provider shortages, it does not seem prudent for North Carolina to do anything to curtail the ability of providers to operate within their existing scope. Although perhaps unintended, this would be the result if the proposed rules are enacted as written.

NCNA respectfully goes on the record in opposition to these draft rules in their current form and would strongly recommend consultation with the North Carolina Board of Nursing to identify language that maintains the current ability of APRNs to engage in fluoroscopy.

Respectfully,

A handwritten signature in cursive script that reads "Tina C. Gordon".

Tina C. Gordon, MPA, CAE, FACHE  
CEO, North Carolina Nurses Association