On Friday, August 12, 2016, the State Board of Proprietary Schools voted to recommend that the State Board of Community Colleges initiation revocation of Priority Nursing College’s proprietary license. Pursuant to 2B SBCCC 200.4, this initial recommendation and the Office of Proprietary Schools' investigative report is presented to the Community Colleges Board for consideration and action.
INVESTIGATIVE REPORT:

PRIORITY NURSING COLLEGE

The North Carolina State Board of Proprietary Schools submits this Investigation Report to the North Carolina State Board of Community Colleges, pursuant to 2B SBCCC 200.2 and Article III, Chapter 150B of the North Carolina General Statutes.

SBCC
09/16/2016
SUMMARY

Report Overview:

1. Copy of Amended Documentation of Noncompliance ........................................ Page 3
2. The laws or rules allegedly violated and a detailed description of how the proprietary school allegedly violated each of the specified laws .............................................. Page 9
3. Description of investigative process ............................................................ Page 17
4. Recommendation of revocation with a supporting rationale for revocation rather than for suspension .................................................................Page 18
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Investigation Overview:

1. Investigation - Documentation of Noncompliance issued June 6, 2016; Amended Documentation of Noncompliance issued June 27, 2016
2. Witnesses Interviewed – 19
3. Student Records Reviewed – 12
4. 5+ hour interview with school administrator

Recommendation Overview:

1. Alleged violations in Amended Documentation of Noncompliance: 5
2. Unsubstantiated violations: 2
3. Substantiated violations that do not rise to level of revocation: 1
4. Substantiated violations that rise to the level of revocation: 2
5. Recommendation to State Board of Proprietary Schools: License Revocation
PART 1: COPY OF AMENDED DOCUMENTATION OF NONCOMPLIANCE

On June 27, 2016, the Office of Proprietary Schools presented the following Amended Documentation of Noncompliance and Notice of Investigation to the administrator of Priority Nursing College.

AMENDED DOCUMENTATION OF NONCOMPLIANCE AND NOTICE OF INVESTIGATION: PRIORITY NURSING COLLEGE

The North Carolina State Board of Proprietary Schools submits this Amended Documentation of Noncompliance to the North Carolina State Board of Community Colleges, pursuant to 2B SBCCC 200.2 and Article III, Chapter 150B of the North Carolina General Statutes.

Proprietary School: Priority Nursing College
1050 Revolution Mill Drive
Greensboro, NC 27405

Administrator/Director: Douglas Wilson

Pursuant to rules adopted by the North Carolina State Board of Community Colleges, a copy of this document as compiled has been presented to the following:

1. Chair of the North Carolina State Board of Proprietary Schools
2. NCCCS Executive Vice President
3. NCCCS General Counsel
4. NCCCS Director of Marketing and Public Affairs

Pursuant to rules adopted by the North Carolina State Board of Community Colleges, a copy of this document as compiled will be presented to the Chief Administrator of the proprietary school at issue within five (5) business days of documenting the noncompliance with the individuals above.

Submitted this 27th day of June, 2016

Scott Corl, Executive Director
Office of Proprietary School
AMENDED DOCUMENTATION OF NONCOMPLIANCE AND
NOTICE OF INVESTIGATION: PRIORITY NURSING COLLEGE

The North Carolina State Board of Proprietary Schools submits this Amended Documentation of Noncompliance to the North Carolina State Board of Community Colleges, pursuant to 2B SBCCC 200.2 and Article III, Chapter 150B of the North Carolina General Statutes.

I. Receipt of Complaint/Evidence of Noncompliance and Investigation

The State Board of Proprietary Schools ("SBPS"), by and through its Executive Director of the Office of Proprietary Schools ("OPS") shall initiate and conduct an investigation of a proprietary school subject to Article VIII, Chapter 115D of the North Carolina General Statutes for either of the following:

(1) The SBCC, acting by and through the NCCCS President or the SBPS receives a written complaint alleging that a proprietary school subject to Article VIII of Chapter 115D has failed to comply with either the requirements of the law or the rules adopted by the SBCC; or

(2) If the State Board of Community Colleges ("SBCC"), acting by and through the State Board of Proprietary Schools ("SBPS"), has evidence that a proprietary school subject to Article VIII, Chapter 115D of the North Carolina General Statutes has failed to comply with either the requirements of law or the rules adopted by the SBCC.

If the SBCC, acting by and through the SBPS, has evidence that a proprietary school failed to comply with either the requirements of the law or the rules adopted by the SBCC, the SBPS shall document all of the evidence of noncompliance in a document to be titled, "Documentation of Noncompliance."

EVIDENCE OF NONCOMPLIANCE

1. School administrator Doug Wilson may have violated N.C.G.S. § 115D-90(c)(12), by not maintaining good reputation and character.

§ 115D-90. License required; application for license; school bulletins; requirements for issuance of license; license restricted to courses indicated; supplementary applications.

§115D-90(c)(12) – The school's administrators, directors, owners and instructors are of good reputation and character.

2. School administrator Doug Wilson may have violated 2A SBCCC 400.1(c)(1), by not maintaining good moral character.

2A SBCCC 400.1 Administration

(c) The chief administrator shall have the following qualifications:

(1) Be a person of good moral character.
Documentation of possible violation:

On May 27, 2016, OPS Executive Director Scott Corl ("Corl") was contacted by a law enforcement officer with the city of Greensboro. Corl was advised that Doug Wilson, school administrator of Priority Nursing College, was arrested and charged with stalking, trespassing, and filing a false police report. The charges stemmed from an incident that occurred at approximately midnight on May 24th, at the residence of one of the school's female students. Wilson called 911 after becoming involved in a physical confrontation with two males at the residence, but according to the officer, Wilson was not honest about why he was in the area at that time of night.

Corl then contacted Wilson, who confirmed the incident took place in the immediate vicinity of the female student's residence and that he was charged with the offenses—but specifically denied any wrongdoing. He stated that the female student began a 9-month Medical Assisting program approximately three weeks ago. According to Wilson, NCWorks paid a portion of the tuition cost for this student and sponsored all other students (6) in the class. Wilson cancelled classes for Wednesday (5/25/16) and Thursday (5/26/16). Wilson admitted to Corl that he was not honest when initially questioned by police. When asked if he was advised by the magistrate to have no contact with the student, Wilson stated "yes."

Corl then spoke to the student, who confirmed she was sponsored by NCWorks. She also stated that she informed her NCWorks counselor about the incident and that she would not return to the school out of concern for her safety.

On this same date, Corl was contacted by a representative with the Guilford County Workforce Development Board. This entity was aware of the incident and the pending criminal charges against Wilson. Corl was advised they would be meeting with students about possibly withdrawing from the school, and that the allegations may jeopardize Priority Nursing College's participation in NCWorks going forward.

Wilson provided rosters and contact information for students and former faculty to Corl upon request and confirmed that no students attended class Tuesday, May 31st through Thursday, June 2nd. On June 2, 2016, Corl contacted the Guilford County Workforce Development Board and confirmed that it was removing all NCWorks students from the school and that it would no longer sponsor students to attend Priority Nursing College.

On June 3, 2016, Corl learned that the female student filed a restraining order against Wilson.
3. Priority Nursing College may be in violation of 2A SBCCC 400.7, by not having the financial resources available to equip and maintain the school or classes.

2A SBCCC 400.7 Financial Stability

A school licensed under G.S. 115D, Article 8, shall have sufficient finances to establish and carry out a program of education on a continuing basis.

Documentation of possible violation:

Priority Nursing College has been a licensed proprietary school since approximately 2004. The school administrator/director is a registered nurse. The school currently operates a single program (Medical Assisting) and has an insurance bond as required by statute.

Although the school has provided sufficient finances to establish and carry out a program of education on a continuing basis for more than a decade, it has reduced its offerings to a single program since approximately January, 2014. At the same time, the school appears to have become reliant upon the NCWorks program for student sponsorship. All students (7) currently enrolled in the Medical Assisting program were sponsored through NCWorks. Moreover, a review of rosters since that time show that NCWorks sponsored 14 of 16 students enrolled into the program. On June 2, 2016, the Guilford County Workforce Development Board confirmed to Corl that it was removing all NCWorks students from the school and that it would no longer sponsor students to attend Priority Nursing College. As a result, there is an immediate concern regarding whether the school will have sufficient finances to establish and carry out a program of education on a continuing basis.

4. Priority Nursing College may be in violation of §115D-93(c)(9), by failing to provide and maintain adequate standards of instruction.

§ 115D-93. Suspension, revocation or refusal of license; notice and hearing; judicial review; grounds.

§115D-93(c)(9) – That the licensee has failed to provide and maintain adequate standards of instruction or an adequate and qualified administrative, supervisory or teaching staff.

Documentation of possible violation:

Priority Nursing College has institutional accreditation with the Accrediting Body of Health Education Schools (ABHES). Students that complete the school’s Medical Assisting program are qualified to sit for the American Association of Medical Assistants (AAMA) certification exam and the National Center for Competency Testing (NCMA) certification exam. The Medical Assistant program is comprised of 16 courses that
provide students with a minimum of 760 total hours of instruction. Students are required to complete a 160-hour clinical.

The license renewal application Priority Nursing College submitted for fiscal year July 1, 2015 – June 30, 2016, identified two instructors for the Medical Assistant program, including Wilson, a registered nurse. In August, 2015, OPS approved an additional instructor.

Since initiating the current investigation on June 6, 2016, OPS has confirmed that the second instructor left the school in or about Summer, 2015. In addition, OPS interviewed the third instructor, who specifically denied teaching any full courses at the school. This individual advised OPS that she had not taught at the school since briefly substituting for Wilson sometime during Fall, 2015. Thus, Wilson has become the lone instructor of the Medical Assisting program.

To date, OPS has interviewed a total of 11 former and currently-enrolled students—all were unanimously highly critical of Wilson’s teaching. This was in direct contrast to positive reviews given for the instructor who left the school. Common criticisms of Wilson included: poor preparation, failure to provide course syllabi, little-to-no advanced notice about topics to be covered in class or test dates, inability or failure to fully answer student questions, and extended disappearance from class on more than one occasion. Several students commented to the effect that it appeared Wilson was learning the material as he was teaching it to them. None would recommend the school to other prospective students.

5. Priority Nursing College may be in violation of 2A SBCCC 400.11(a)(2) and (a)(4) by not maintaining current, complete, and accurate records showing student progress and attendance and/or student account ledgers.

2A SBCCC 400.11 Student Records

(a) A school licensed under G.S. 115D, Article 8, shall maintain current, complete, and accurate records to show the following:…

(2) Progress and attendance including date entered, dates attended, subjects studied, and class schedule…;

(4) All student account ledgers shall include, at a minimum, monies owed and paid by each student, and refunds issued by the school.

Documentation of possible violation:

OPS visited Priority Nursing College on June 6, 2016. At that time, Wilson turned over the files of the 7 currently-enrolled students. Upon review, the files did not appear to maintain current and accurate records of student attendance and academic
progress, and did not appear to contain student account ledgers showing monies owed and paid by each student. It was the understanding of OPS that Wilson turned over the entirety of records maintained for each student. If such records were solely recorded and maintained electronically, that information was not provided to OPS on June 6th.

II. Request to Provide Written Response:

Pursuant to 2B SBCCC 200.2(c), it is requested that the chief administrator or other agent of Priority Nursing College submit a written response within ten (10) business days of receiving this Notice. The response must be signed and directed to the Executive Director of the Office of Proprietary Schools on behalf of the State Board of Proprietary Schools:

Scott Corl, Office of Proprietary Schools
North Carolina Community College System Office
5001 Mail Service Center
Raleigh, NC 27699-5001
PART 2: THE LAWS OR RULES THE PROPRIETARY SCHOOL ALLEGEDLY VIOLATED AND A DETAILED DESCRIPTION OF HOW THE PROPRIETARY SCHOOL ALLEGEDLY VIOLATED EACH OF THE SPECIFIED LAWS

I. UNSUBSTANTIATED VIOLATIONS:

The following alleged violations as contained in the foregoing Amended Documentation of Noncompliance and Notice of Investigation were not substantiated by evidence collected during the investigation.

*Allegation #5: Priority Nursing College may be in violation of 2A SBCCC 400.11(a)(2) and (a)(4) by not maintaining current, complete, and accurate records showing student progress and attendance and/or student account ledgers.*

The allegation above arose from initial review of seven (7) student files obtained from Wilson on June 6, 2016. The files did not appear to maintain current and accurate records of student attendance and academic progress, and did not appear to contain student account ledgers showing monies owed and paid by each student. At the time, it was the understanding of OPS that Wilson turned over the entirety of records maintained for those students. Due to these concerns, the original Documentation of Noncompliance and Notice of Investigation was amended to include this possible violation.

The evidence obtained through the investigation did not substantiate this alleged violation. Wilson subsequently provided OPS with electronic documentation to include attendance, academic progress and accounting ledgers for the 7 student files obtained on June 6, 2016. Such documentation was also evident in review of five (5) additional student files (students who had completed the program) obtained by OPS during a campus visit on June 27, 2016.

*Allegation #2: School administrator Doug Wilson may have violated 2A SBCCC 400.1(c)(1), by not maintaining good moral character.*

This issue was first presented to the Office of Proprietary Schools on May 27, 2016, during a telephone call from a Police Sergeant with the City of Greensboro. OPS was advised that Doug Wilson, school administrator of Priority Nursing College, was arrested and charged with stalking, trespassing, and filing a false police report. The charges stemmed from an incident that occurred at approximately midnight on May 24, 2016, at the residence of one of the school’s female students. Wilson called 911 after becoming involved in a physical confrontation with two males at the residence, but according to the officer, he was not honest when initially questioned by the police. OPS then contacted Wilson, who confirmed his arrest—but he specifically denied any wrongdoing. Wilson did admit that he was not honest when initially questioned by
Police. When asked if he was advised by the magistrate to have no contact with the student, Wilson stated “yes.”

“Good moral character” describes behaviors in which applicants have been involved and details requirements for consideration for certain benefits or positions. The term is primarily associated with immigration law but government agencies often make it a requirement for a particular position of employment or licensure in a particular occupation or profession. In relation to immigration law, conviction of an offense involving moral turpitude can establish a lack of good moral character. North Carolina statutes do not define a crime of moral turpitude but it is defined in case law as “act[s] of baseness, vileness, or depravity in the private and social duties that a man owes to his fellowman or to society in general.” Dew v. State ex. rel. North Carolina Dept. of Motor Vehicles, 127 N.C. App. 309 (1997) (quoting Jones v. Brinkley, 174 N.C. 23, 27 (1917)). In general terms, moral turpitude refers to conduct that is considered contrary to community standards of justice, honesty or good morals.

The original court date for these offenses was July 6, 2016. That court date was continued to August 24, 2016. [See attached North Carolina Court System Offenses Query Reports dated 6/1/2016 and 7/13/16: Case Numbers 2016076649-50 CR.] Conviction of filing a false police report could establish proof that Wilson’s conduct was contrary to community standards of justice, honesty and good morals. Such a conviction could also establish an additional statutory violation of §115D-93(c)(5): “That the applicant or licensee has pleaded guilty, entered a plea of nolo contendere or has been found guilty of a crime involving moral turpitude by a judge or jury in any state or federal court.” Finally, any such conviction would likely impact Wilson’s nursing license. Thus, while evidence concerning Wilson’s reputation and character was collected during the investigation as presented below, this specific alleged violation is considered unsubstantiated pending the final outcome of the criminal proceedings.

II. SUBSTANTIATED VIOLATIONS THAT DO NOT RISE TO THE LEVEL OF RECOMMENDING PROPRIETARY LICENSE REVOCATION:

The following alleged violation as contained in the foregoing Amended Documentation of Noncompliance and Notice of Investigation was substantiated by evidence collected during the investigation. However, due to the nature of the violation, it does not rise to the level of recommending revocation of the school’s proprietary license to operate one or more programs—at this time.

Allegation #3: Priority Nursing College may be in violation of 2A SBCCC 400.7, by not having the financial resources available to equip and maintain the school or classes.
This allegation arose from a telephonic conversation initiated by a representative of the Guilford County Workforce Development Board on May 27, 2016. OPS was advised that the criminal charges against Wilson for stalking, trespassing and filing a false police report could prohibit NCWorks from sponsoring students at the school. This was significant because NCWorks had sponsored nearly all students enrolled at the school since approximately January, 2014. On June 2, 2016, the Guilford County Workforce Development Board confirmed that it was removing all NCWorks students from the school and would no longer sponsor students to attend Priority Nursing College.

Investigation

Wilson did not deny these allegations in the attached written response. [See attached response from Wilson to the original Documentation of Noncompliance dated June 15, 2016. NOTE: Confidential information redacted.] Rather, he provided corrective actions to include: increasing student scholarships, additional payment plan options for students, increasing program offerings at the school, and seeking Title IV funding. Wilson also provided documentation of the most recent checking account statement for the school (May 2016) and the most recent school investment account statement (May 2016), verifying access to a reserve of funds to maintain the school’s financing at least on a short-term basis.

Conclusion

There is genuine concern for the school’s long-term financial health. However, the school has been continuously licensed since 2004. It was able to operate before NCWorks existed. The school also appears to have access to a pool of money to meet immediate fixed monthly rent and overhead expenses, which Wilson stated was approximately $1,600. Finally, the school has a current and active insurance bond.

Although the totality of the circumstances favor granting the school an opportunity to prove it is viable without NCWorks funding, it would require increased oversight by OPS to include: submission of a detailed financial improvement plan, monthly financial reporting, documentation that regular monthly school expenses are being paid, and any other measure deemed appropriate by the State Board of Proprietary Schools. It would also be recommended that the Proprietary Board review the school’s cooperation and progress during regularly-scheduled meetings.

III. SUBSTANTIATED VIOLATIONS THAT RISE TO THE LEVEL OF RECOMMENDING PROPRIETARY LICENSE REVOCATION:

The following alleged violations as contained in the foregoing Amended Documentation of Noncompliance and Notice of Investigation were substantiated by evidence collected
during the investigation. Due to the nature of the violations, recommending revocation of the school's proprietary license to operate one or more programs is appropriate.

**Allegation #1: School administrator Doug Wilson may have violated N.C.G.S. § 115D-90(c)(12), by not maintaining good reputation and character.**

This issue was first presented to the Office of Proprietary Schools on May 27, 2016, during a telephone call from a Police Sergeant with the City of Greensboro. OPS was advised that Doug Wilson, school administrator of Priority Nursing College, was arrested and charged with stalking, trespassing, and filing a false police report. The charges stemmed from an incident that occurred at approximately midnight on May 24, 2016, at the residence of one of the school's female students. Wilson called 911 after becoming involved in a physical confrontation with two males at the residence, but according to the officer, he was not honest when initially questioned by the police. OPS contacted Wilson, who confirmed his arrest—but specifically denied any wrongdoing. Wilson did admit that he was not honest when initially questioned by police. When asked if he was advised by the magistrate to have no contact with the student, Wilson stated “yes.”

**Investigation**

The first point of contact about this incident came from law enforcement—not Wilson. This individual expressed great concern regarding the circumstances surrounding this incident and the fact that it involved a teacher-student relationship. OPS was advised that Wilson was not honest with police when they initially interviewed him, and he was subsequently charged with stalking, trespassing and filing a false police report. [See attached North Carolina Court System Offenses Query Reports dated 6/1/2016 and 7/13/16: Case Numbers 2016076649-50 CR.] OPS contacted Wilson, who confirmed his arrest, but specifically denied any wrongdoing. Wilson did admit that he was not honest when initially questioned by police.

OPS then immediately contacted the female student, who specifically stated that she refused to return to the school out of fear for her safety. OPS subsequently interviewed all remaining students (6) enrolled in the program at the time of this incident. Each independently stated that they refused to return to the school for the same reason. Finally, all seven confirmed attending a meeting on or about June 1, 2016, in which they collectively informed NCWorks representatives that they would not return to the school out of fear for their safety.

As part of its investigation, OPS interviewed a representative with the Guilford County Workforce Development Board and also a legal representative with the City of Greensboro. They confirmed that the female student immediately notified them about the incident and her fear of Wilson. They further confirmed that the remaining students informed NCWorks that they did not want to return to the school. On June 7, 2016, the City of Greensboro formally terminated the relationship between the Guilford County NCWorks Career Center and Priority Nursing College. Wilson rejected this decision, stating his belief that the withdrawal of the students “was influenced and orchestrated by NCWorks by applying pressure to most if not all of the students to withdraw from our
program with the threat of cutting off funding for those students.” [See attached email and letter from the City of Greensboro to Wilson dated June 7, 2016, and response email and letter from Wilson to the City of Greensboro dated June 17, 2016. NOTE: Confidential information redacted.]

OPS also conducted two lengthy interviews (approximately 5 hours total) with Wilson at his school. Wilson stated that he used the information on the female student’s enrollment application to locate what he believed to be her residence. According to Wilson, he was driving around the student’s neighborhood that evening (May 24, 2016) to determine the type of housing she lived in. Wilson stated that he was being “pressed by NCWorks” to make sure the students they sponsored could pay the portion they would owe to the school. Wilson stated that he stopped and exited his vehicle that evening (in the immediate proximity of the female student’s residence) to urinate. After doing so, Wilson said “my plan was to walk by her house and walk back to my truck,” when he became involved in an altercation with two male individuals at the residence—there are conflicting versions of what happened during the events leading to Wilson’s arrest. Wilson acknowledged that the female student in question did not have to make a payment to the school until July, and admitted that he purposely visited the area late at night (around midnight) to avoid possible recognition of his vehicle.

According to Wilson, he was unfamiliar with the area the female student lived in, despite the fact that she resided approximately “8 -10 minutes” from him. Wilson denied any information or action by the female student that would establish doubt about her ability to make the July payment: the student’s enrollment agreement showed she was college-educated, not a dependent, and she had gainful employment. Wilson also stated that he had a prior conversation with the student about making the July payment and her student file contained a signed agreement acknowledging it. When asked what would happen if the student did not make the July payment, Wilson stated he could use the information that she (potentially) lived in a lower-income neighborhood to “work out a payment plan with her.” During the course of the initial interview on June 6, 2016, Wilson admitted to driving by the home of another female student approximately one week prior to his arrest under similar circumstances. Wilson stated he was also unfamiliar with this area—though this student lived “about 3 miles” from his home.

OPS received Wilson's written response to the initial Documentation of Noncompliance and Notice of Investigation on June 17, 2016. The response details Wilson’s version of events the evening of his arrest and maintains that he was “carrying out my duties as Administrator and Director of the school in completing a part of our assessment (Housing) of the student’s ability to pay their required portion of the student tuition as agreed upon by the student, Priority Nursing College and NCWorks.” [See attached response from Wilson to the original Documentation of Noncompliance dated June 15, 2016. NOTE: Confidential information redacted.]

As of the submission of this report, the criminal charges against Wilson for stalking, trespassing and filing a false police report are set to be heard August 24, 2016. A separate No-Contact Order taken out by the female student against Wilson was denied and dismissed on June 17, 2016.
Conclusion

A common definition of "reputation" is the estimation in which a person or thing is held, especially by the community or the public generally. "Character" refers to the mental and moral qualities distinctive to an individual. Being arrested out of an incident occurring late at night at what was believed to be the home of a female student clearly establishes a red flag for Wilson's reputation and character. Evidence gathered during the investigation further establishes that school administrator Doug Wilson violated N.C.G.S. § 115D-90(c)(12), by not maintaining good reputation and character.

- Wilson has not maintained good reputation and character with the students of the school. The most recent students (7) enrolled at Priority Nursing College (dating to November, 2015) at the time of the incident leading to Wilson's arrest have stopped attending the school and have specifically refused to return out of fear for their safety. When students provide a physical address to educational institutions, there is not an expectation that it will be used by instructors or school administrators for the purposes Wilson did. That Wilson himself understood the inappropriateness of his actions is evident by the fact that he purposely visited the area late at night to avoid recognition of his vehicle and, moreover, he was not honest when initially questioned by the police. Even assuming Wilson had a legitimate reason for viewing the housing students lived in, he could have easily done so through other public sources such as Google Maps. Regardless, if Wilson had such concerns about the student's ability to pay, he should have resolved it prior to her enrollment. The impact on potential students is unknown, but the criminal charges against Wilson are public in nature and it is notable that the school has had no new enrollment since this incident occurred on May 24th.

- Wilson has not maintained good reputation and character with NCWorks, the Guilford County Workforce Development Board and the City Attorney of Greensboro. Wilson admittedly became dependent upon NCWorks for the sponsorship of students in or about January, 2014. As detailed in the attached letter from the Greensboro City Attorney, Guilford County NCWorks will no longer sponsor students at Priority Nursing College. Wilson's response to this is telling. Although he is without question assumed innocent until proven guilty in a court of law, Wilson failed to take any responsibility for the impact his actions had on his students and did not acknowledge or address the requested refunds. Rather, his sole focus is challenging the decision to end the sponsoring relationship. [See attached email and letter from the City of Greensboro to Wilson dated July 22, 2016, and response email and letter from Wilson to the City of Greensboro dated July 25, 2016.]

- Wilson has not maintained good reputation and character with local law enforcement. Wilson admits that he was charged with stalking, trespassing and filing a false police report, but denies any wrongdoing. These charges are currently pending with a court date of August 24, 2016. Regardless, character and reputation are not required to be proven beyond a reasonable doubt. Wilson admitted that he was not honest when initially questioned by police. To the knowledge of OPS, two officers and a Sergeant are involved in the investigation of this incident. Given the charge of filing a false police report, it is assumed their
collective opinions of Wilson’s good reputation and character are not positive. It can also be anticipated that they will share these opinions with prosecutors, the judge and the courtroom at large if this case is brought to trial.

Whether a court ultimately finds Wilson’s actions to establish the elements necessary to be convicted of a crime is irrelevant. Wilson’s good reputation and character are impugned nonetheless.

_Allegation #4: Priority Nursing College may be in violation of §115D-93(c)(9), by failing to provide and maintain adequate standards of instruction._

On June 6, 2016, OPS presented Wilson with a Documentation of Noncompliance and Notice of Investigation. Specific feedback from interviews OPS conducted with all students (7) enrolled at the school at the time of Wilson’s arrest, as well as additional interviews with students (4) who had recently completed the Medical Assisting program led OPS to amend the original Notice. The Amended Documentation of Noncompliance and Notice of Investigation in Part 1 of this report was presented to Wilson at his school on June 27, 2016.

Investigation

The license renewal application Priority Nursing College submitted for fiscal year July 1, 2015 – June 30, 2016, identified two instructors for the Medical Assistant program, including Wilson, a registered nurse. In August, 2015, OPS approved a third instructor.

On June 6, 2016, Wilson advised OPS that the second instructor left the school in or about Summer, 2015. OPS tried unsuccessfully to contact this instructor, but subsequently interviewed the third instructor, who specifically denied teaching any full courses at the school. This individual advised OPS that she had not taught at the school since briefly substituting for Wilson sometime during Fall, 2015. Thus, Wilson has become the lone instructor of the Medical Assisting program.

OPS initially interviewed a total of 11 students (all students (7) enrolled at the school at the time of Wilson’s arrest, and four (4) students who had recently completed the Medical Assisting program). All 11 were unanimously highly critical of Wilson’s teaching. This was in direct contrast to positive reviews given for the instructor who left the school. Common criticisms of Wilson included: poor preparation, failure to provide course syllabi, little-to-no advanced notice about topics to be covered in class or test dates, inability or failure to fully answer student questions, and extended disappearance from class on more than one occasion. Several students commented to the effect that it appeared Wilson was learning the material as he was teaching it to them. None would recommend the school to other prospective students.

Wilson failed to provide a written response to this allegation as presented in the foregoing Amended Documentation of Noncompliance. However, OPS discussed this criticism with Wilson during a second interview on June 27, 2016. Reiterating his response to the City of Greensboro, Wilson alleged NCWorks was directing the students to make negative comments. OPS then requested a list of students who were not sponsored by NCWorks. Wilson provided a list of 26 former students the following
day. Telephone numbers were provided for 24 students; phone numbers and email addresses were provided for the other 2 students. OPS subsequently attempted to contact all 26 students:

- The phone numbers for 6 students were no longer correct or in service;
- For the 2 students with a provided email address, OPS left multiple voicemails and also emailed the students—but neither responded;
- OPS left multiple voicemails for the 18 remaining students;
- OPS was able to interview 4 students (all completed unrelated programs several years prior). One student could not recall or confirm Wilson as her instructor; two students provided positive feedback about Wilson; but one other student expressed very negative comments about Wilson’s teaching and her experience at the school.

Wilson also provided OPS with two sets of student evaluations. For the three most recent students enrolled at the school in Spring, 2016 (including the female student herein), he provided American Heart Association Emergency Cardiovascular Care (ECC) course evaluations. For the four students who completed the course in Fall, 2015, Wilson produced their Student Evaluation Forms. [See attached ECC course evaluations (3) and Student Evaluation Forms (4).]

According to a representative with the Guilford County Workforce Development Board, three sponsored students were scheduled to take a Medical Assisting certification exam on or about June 23, 2016. OPS was advised that one student passed the exam and two failed.

Conclusion

Evidence gathered during the investigation establishes that school administrator Doug Wilson violated §115D-93(c)(9), by failing to provide and maintain adequate standards of instruction. Wilson is currently the lone instructor at the school. The 11 students enrolled in the Medical Assisting program since approximately January, 2014, unanimously expressed very negative comments about Wilson’s teaching and their experiences at the school to include: poor preparation, little-to-no advanced notice about topics to be covered in class on a daily basis or test dates, inability or failure to fully answer student questions, and extended disappearance from class on more than one occasion. Several students commented to the effect that it appeared Wilson was learning the material as he was teaching it to them. None would recommend the school to other prospective students. Wilson did not provide evidence to support his allegation that the negative comments were being directed by NCWorks, and while negative comments could be anticipated from the 7 students enrolled at the time of the incident leading to Wilson’s arrest, the other 4 students originally interviewed had already completed their instruction. Wilson did provide Student Evaluation Forms for these 4 students, but it is unclear as to whether the feedback is for Wilson, the instructor who left the school (during the summer of 2015), or both. [See attached Student Evaluation...
Finally, these concerns were not alleviated through subsequent interviews with prior students who were not sponsored by NCWorks or the recent certification test results.

PART 3: DESCRIPTION OF INVESTIGATIVE PROCESS

I. INITIATION OF INVESTIGATION:

The decision to investigate Priority Nursing College arose from a telephone call OPS received from law enforcement on May 27, 2016, advising that Doug Wilson, school administrator of Priority Nursing College, was arrested and charged with stalking, trespassing, and filing a false police report. The incident leading to Wilson's arrest took place late in the evening (around midnight) in the immediate vicinity of what was believed to be a female student's residence. OPS subsequently contacted Wilson and the female student. Wilson confirmed the criminal charges but denied any wrongdoing. The female student advised OPS that she immediately reported the incident to NCWorks and stated that she refused to return to the school out of concern for her safety. On June 2, 2016, a representative with the Guilford County Workforce Development Board advised OPS that it was removing all NCWorks students from the school and that it would no longer sponsor students to attend Priority Nursing College.

Between May 27, 2016, and June 1, 2016, the Office of Proprietary Schools contacted and interviewed potential witnesses who corroborated concerns of noncompliance with either the requirements of the law or the rules adopted by the State Board of Community Colleges.

On June 6, 2016, OPS presented Wilson with a Documentation of Noncompliance and Notice of Investigation documenting all of the evidence of known noncompliance. Based on additional evidence, OPS presented Wilson with the foregoing Amended Documentation of Noncompliance and Notice of Investigation on June 27, 2016.

II. INVESTIGATION:

The Office of Proprietary Schools presented Wilson with a Documentation of Noncompliance and Notice of Investigation on June 6, 2016. Wilson provided a written response to the Notice on June 17, 2016. Based on additional concerns, Wilson was presented with the foregoing Amended Documentation of Noncompliance and Notice of Investigation on June 27, 2016. A total of nineteen (19) individuals were interviewed, including: 1) the seven students enrolled at the school at the time of the incident leading to Wilson's arrest; 2) four students who completed the Medical Assisting program immediately prior to those seven students; 3) a currently-approved instructor for the school; 4) four prior students of the school who were not sponsored by NCWorks; 5) a representative with the Guilford County Workforce Development Board; 6) the Chief
Deputy City Attorney for the City of Greensboro; and 7) a Sergeant with the Greensboro Police Department. In addition, the Office of Proprietary Schools conducted two lengthy in-person interviews (totaling approximately 5 hours) with the school's administrator. OPS also reviewed 12 student files and correspondence between the City of Greensboro and Wilson.

PART 4: RECOMMENDATION OF REVOCATION OF THE PROPRIETARY SCHOOL'S LICENSE TO OPERATE ONE OR MORE PROGRAMS WITH A SUPPORTING RATIONALE FOR REVOCATION RATHER THAN FOR SUSPENSION

Priority Nursing College has been a licensed proprietary school since 2004. During that time, it appears to have enjoyed a good reputation in the community and turned out hundreds of healthcare professionals. Unfortunately, the school has encountered serious issues with regard to its current operations. These problems have become so severe, that the State Board of Proprietary Schools can only carry out its statutory obligation of protecting proprietary school students by initiating revocation of the school's proprietary license.

The State Board of Proprietary Schools should initiate license revocation rather than suspension for the following specific reasons:

1. **Nature and severity of violations:**

   School administrator Doug Wilson violated N.C.G.S. § 115D-90(c)(12), by not maintaining good reputation and character. Wilson used the information provided on an enrollment application to visit what he believed to be the residence of a female student. Although Wilson challenges the facts as to what occurred after arriving at the residence sometime around midnight, he was arrested and charged with stalking, trespassing and filing a false police report. Regardless of whether he is ultimately convicted of a criminal offense, Wilson has failed to maintain good reputation and character with the students enrolled at the school; failed to maintain good reputation and character with NCWorks, the Guilford County Workforce Development Board and the Chief Deputy City Attorney of Greensboro; and failed to maintain good reputation and character with local law enforcement.

   Wilson also violated §115D-93(c)(9), by failing to provide and maintain adequate standards of instruction. The 11 students enrolled in the Medical Assisting program since approximately January, 2014, unanimously expressed very negative comments about Wilson’s teaching. No students would recommend the school. Wilson provided no evidence to support his allegation that the criticisms were directed by NCWorks, and interviews with additional students and recent certification test results did not alleviate this concern.

   The foregoing are serious violations of licensing standards that are not easily or immediately correctable.
2. **Actions of school since receiving Notice of Investigation:**

As required by the rules adopted by the State Board of Community Colleges, the Notice of Investigation requested a written response from the school within ten (10) business days of receiving the Notice. Wilson provided a written response to the original Notice, but failed to provide a written response to allegations 4 and 5 as contained in the foregoing Amended Documentation of Noncompliance. But, Wilson did provide specific documentation in response to these allegations and he was cooperative throughout the investigation. Wilson’s actions, however, underscore why license revocation is more appropriate than suspension.

Wilson has continuously displayed an inability or failure to appreciate the ramifications of his actions. As echoed in his responses to this Office and the City of Greensboro, he instead appears to believe this issue will be resolved exclusively by the outcome of the legal proceedings he faces. Despite the fact that it was immediately evident that all of the students refused to return to the school due to his actions and arrest, Wilson has taken the position that they remain enrolled at the school and he continues to record them as absent and demand payment from them. [See attached letter and withdrawal form from Wilson to student dated July 19, 2016. NOTE: Confidential information redacted.] Wilson has also failed to acknowledge or make any attempt to reimburse NCWorks for the sponsorship of the students. He instead continues to demand that the City of Greensboro reverse its decision to no longer sponsor students at his school. In sum, Wilson has shown a blatant disregard to the consequences of his actions—especially as they relate to his students.

3. **Statutory Authority:**

Pursuant to North Carolina General Statute §115D-93(c), the State Board of Community Colleges, acting by and through the State Board of Proprietary Schools, “shall have the power to refuse to issue or renew any such license and to suspend or revoke any such license theretofore issued in case it finds one or more of the following:”

§115D-93(c)(1) - That the applicant for or holder of such a license has violated any of the provisions of this Article or any of the rules promulgated thereunder.

§115D-90(c)(12) - The school’s administrators, directors, owners and instructors are of good reputation and character.

§115D-93(c)(9) - That the licensee has failed to provide and maintain adequate standards of instruction or an adequate and qualified administrative, supervisory or teaching staff.

Wilson violated §115D-93(c)(1) by and through his violation of the provision in §115D-90(c)(12) to maintain good reputation and character. Wilson also violated §115D-93(c)(9) by failing to provide and maintain adequate standards of instruction or an adequate and qualified administrative, supervisory or teaching staff.
4. **Policy:**

"The State Board of Community Colleges, acting by and through the State Board of Proprietary Schools, shall have general supervision over proprietary schools in the State, the object of said supervision being to protect the health, safety and welfare of the public by having the proprietary schools maintain adequate, safe and sanitary school quarters, sufficient and proper facilities and equipment, sufficient and qualified teaching and administrative staff, and satisfactory programs of operation and instruction, and to have the school carry out its advertised promises and contracts made with its students and patrons." (North Carolina General Statute §115D-89(c)).

The seven students enrolled at the time of the incident leading to Wilson's arrest sought to improve their lives through the completion of the Medical Assisting program. Wilson's actions and arrest were the direct cause of them leaving the school. These students did not make that decision in a vacuum and fully recognized they would be sacrificing the time lost by the disruption of their learning and also the time, difficulty and expense of locating another program in their area. Rather than acknowledging this and doing everything he could to make the students as whole as possible, Wilson has done nothing on their behalf. The Guilford County NCWorks program was also impacted by Wilson's actions. NCWorks invested thousands of dollars to train the students at Wilson's school, only to find that it had to locate alternate programs for them and invest additional money toward their training. Wilson has not only failed to even acknowledge or address NCWorks' reimbursement request, he astonishingly continues to challenge the City of Greensboro's decision to terminate the relationship between Priority Nursing College and the NCWorks Career Center of Guilford County.

**CONCLUSION AND RECOMMENDATION**

The recommendation herein is not made lightly. Establishing and building a successful business is daunting and arduous, and Wilson has devoted the last 12 years of his professional career to his school. Priority Nursing College does not have a history of student complaints or compliance issues with this Office. In most every other scenario, corrective measures to bring the school into compliance would be favored. But the specific facts in this instance dictate otherwise.

For the reasons provided herein, it is the recommendation of this Office that initiation of revocation of the proprietary license of Priority Nursing College is a proper and necessary action for the State Board of Proprietary Schools to fulfill its statutory obligation of protecting proprietary school students. The Board should also pursue available options to reimburse applicable students and the NCWorks Career Center of Guilford County.
ATTACHMENTS:

1. North Carolina Court System Offenses Query Reports dated 6/1/2016 and 7/13/16: Case Numbers 2016076649-50 CR.
2. Written response from Wilson to the original Documentation of Noncompliance dated June 15, 2016.
4. June 17, 2016 email from Wilson to Corl, providing a copy of Wilson's written response to the City of Greensboro.
6. July 25, 2016 email and letter from Wilson to the City of Greensboro.
7. Three (3) ECC Course Evaluation forms and four (4) Student Evaluation Forms provided by Wilson to the Office of Proprietary Schools.

Respectfully submitted this 12th day of August, 2016.

Scott Corl, Executive Director
Office of Proprietary Schools
Attachment 1:

North Carolina Court System Offenses Query Reports dated 6/1/2016 and 7/13/16: Case Numbers 2016076649 -50 CR.
Arraigned Offenses for Case Number: 2016076649 CR  
Arraigned Defendant Name: WILSON, DOUGLAS, PALMER  
County: GUILFORD  
Court Date: 07/06/2016  
Session: AM  
Court Room: GB1B

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<th>Statute</th>
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<td>5381</td>
<td>Misdemeanor MISDEMEANOR STALKING</td>
<td>14-277.3A(C)</td>
</tr>
<tr>
<td>5362</td>
<td>Misdemeanor FALSE REPORT TO POLICE STATION</td>
<td>14-225(A)</td>
</tr>
</tbody>
</table>

<< Back
Arraigned Offenses for Case Number: 2016076650 CR  
Arraigned Defendant Name: WILSON, DOUGLAS, PALMER  
County: Guilford  
Court Date: 07/06/2016  
Session: AM  
Court Room: GB1B

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<tr>
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<td>Misdemeanor FIRST DEG TRESP ENTER/REMAIN</td>
<td>14-159.12</td>
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<td>Misdemeanor FALSE REPORT TO POLICE STATION</td>
<td>14-225(A)</td>
</tr>
</tbody>
</table>

<< Back
Arraigned Offenses for Case Number: 2016076650 CR
Arraigned Defendant Name: WILSON, DOUGLAS, PALMER
County: GUILFORD
Court Date: 08/24/2016
Session: AM
Court Room: GBIC

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<tr>
<td>5708</td>
<td>Misdemeanor FIRST DEG TRESP ENTER/REMAIN</td>
<td>14-159.12</td>
</tr>
</tbody>
</table>

<< Back
Attachment 2:

Written response from Wilson to the original Documentation of Noncompliance dated June 15, 2016.
Priority Nursing College

1050 Revolution Mill Dr
Greensboro, NC 27405
Phone 336 272-4952
Fax: 336 338-7300

Email: sales@prioritynursingcollege.com
Web: www.prioritynursingcollege.com

June 15, 2016

Scott Corl, Executive Director :Office of Proprietary Schools
State Board of Proprietary Schools
North Carolina Community College System Office
5001 Mail Service Center
Raleigh, NC 27699-5001

In response to N.C.G.S 115D-90 © (12)115D-90

Douglas Wilson (owner, administrator, director, and instructor) and Gail Orr (adjunct instructor) are of good reputation and character. Douglas Wilson has been operating/instructing at Priority Nursing College since 2004. Out of the 12 years that Priority Nursing College has been operating this is the only incident where our good reputation and character have been challenged. Neither the school nor Douglas Wilson has been proven guilty of any crimes. We have graduated numerous students who have gone on to become professionals in the healthcare field; nursing assistants, phlebotomists, EKG Technicians, medication aides, medical assistants. On the night of May 24, I was carrying out my duties as Administrator and Director of the school in completing a part of our assessment (Housing) of the student’s ability to pay their required portion of the student tuition as agreed upon by the student, Priority Nursing College and NC Works. I was chased onto the property (redacted) by 2 men. I ran for fear of my life when chased, jumped over the fence at (redacted) until I got to the street, I continued to run up the street. 2 guys drove up from behind in their car. The guys got out of their car, yelled “Are you a narc” and assaulted me on someone else’s property; after the assault I went to a neighbor’s house and called 911. The guys who assaulted and robbed me, later attempted to use my ATM/credit cards to obtain funds at several locations while I was at the police scene.
In response to 2A SBCC400.1(c) (1)

On the night of May 24, I was carrying out my duties as Administrator and Director of the school in completing a part of our assessment (Housing) of the student’s ability to pay their required portion of the student tuition as agreed upon by the student, Priority Nursing College and NC Works. I was chased onto the property by 2 men. I ran for fear of my life when chased, jumped over the fence until I got to the street, I continued to run up the street. The guys got out of the car yelled “Are you a narc” and assaulted me on someone else’s property; after the assault I went to a neighbor’s house and called 911. The guys who assaulted and robbed me, later attempted to use my ATM/credit cards to obtain funds at several locations. “See locations attached”

I was charged with making a misleading report and per police report “stated that while in the area of orange street was the victims of an unprovoked assault when upon further investigation was the perpetrator of a trespassing and stalking to hinder and obstruct the law enforcement officer in the performance of his duty, investigating said occurrence and to the true nature of the events that had occurred”. It was an unprovoked attack as I stated to the police officer. The officer said that it was a provoked assault. I have reported to the police that I was assaulted and my keys and wallet stolen. I have financial records that report the attempted use of my ATM/credit cards.

When talking about the incident to Mr. Corls, I told him that when asked by the officer if I knew anyone in the area, I responded that I did not. The student admitted to falsifying her registration application in recording an incorrect address on her registration form as to where she lived (On the 50 (c) she filed). The student did not live at the address of the alleged incident.

The reason for being in the neighborhood at that time was to assess what type of housing/neighborhood the student lived in and to help assess the student’s ability to make scheduled payments of tuition (We were heavily pressured by NC Works to come up with a plan to insure that students did pay their student proportion of tuition due; please see our guidelines and NC Works proposed payment plan). At no time before, during or after school have I made any inappropriate comments to the student or completed any action which would make the student or any other student feel unsafe. The only interest I had that night was related to the student’s ability to pay her tuition as part of the proposed payment plan initiated by NC Works and agreed upon by Priority Nursing College and the student. I did not commit any crimes.

On June 3, I voluntarily informed Mr. Corls of information regarding the 50 (c) filed by the student on June 2 against me. I believe that this civil charge was filed on May 31 because I called the division of detectives to inquire about the assault that I received and to follow-up of the robbery (My keys and wallet were stolen and ATM/credit cards were used to attempt to obtain money from several locations).
I have faithfully run the school with respect and dignity without incident for 12 years. Priority Nursing College has never been denied a renewed license since our beginning in 2004. I regret that this tragedy has happened to PNC but want you to know that I never performed any wrongdoings in carrying out my professional duties as the administrator/director/instructor of the school since the start of the school. I have served to the best of my ability in making decisions and performing actions that affect the school in a positive way. I have always upheld the integrity of the school to the highest regard and will continue.

The chief administrator (Douglas Wilson) is of good moral character. Over the many years my goal was to assist students in any way I could to helping them obtain their goal of becoming a certified nursing assistant, med aide, EKG technician, phlebotomist, or medical assistant. I have tried to the best of my ability to see that these students succeeded. I have never been accused by any student of inappropriate behavior in 14 years of teaching to include teaching at the community college.

In response to 2A SBCCC 400.7 Financial Stability

Priority Nursing College has been operating since 2004 in the community and triad. Assisting many students with new health careers. We look forward to continuing to offer prospective students a chance for growth opportunities in healthcare.

Priority Nursing College will likely be seeking Title IV funding within the next 2 weeks. In the interim, PNC will offer increased scholarships to prospective students to assist with tuition. In addition payment plans will be offered. PNC has submitted the last statement received from its banking center along with its current value of stocks received from its brokerage account. Priority Nursing College may also activate its current inactive phlebotomy program.

Douglas Wilson
Director
Attempted Use of my Personal Credit Card, ATM Card and Business Card.

My personal credit card

Was attempted at the cash points 1941 Coliseum Blvd which is part of the Credit Union.

1. $200 attempted x1 at 12:33 am
2. $300 attempted x4 at 12:33 am
3. $80 attempted x5 at 12:33 am

The personal credit card was also tried at Citgo 31151081 3512 Kivett Dr High Point NC 27620. Phone 336 886-2009. I spoke to Dustin and he said would contact his Mgr to sit up a time to view camera. Antonio is the Mgr.

Attempted $1.00 x 4 at this location May 25th at 2:19 am.

My personal ATM card

1. May 25 at 2:19 am $95. Attempted at Shell Station, Greensboro store 584 58701
2. May 25th at 1:42 am of $100. happened at Family Fare on Church St. 2750 North Church st
3. May 25th at 1:38 pm $91. at Circle K 101 pisgah church rd, Greensboro NC
4. May 25th at 1:42 pm $100. Family fare 2750 N Church St
5. May 25th at 1:44 pm $100. Family Fare 2750 N Church St
6. May 25th at 2:19 pm $95.00 Shell station in Greensboro, store # 584 58701
6. May 25th at 12:44am $40. 1941 Coliseum Boulevard /Cashpoints

Business Debt Card Attempts:

Attempted to purchase through paypal which was blocked at 1:46am on May 25. 1 888 221-1161
Guidelines to Improve Student Payments Portion Received:

Priority Nursing College will evaluate the following when assessing student ability to pay student portion of tuition:

1. Priority Nursing College will look at student income, work status (part-time, full-time, working when needed, not working, retired, disabled, etc).
2. Dependant or Independent: Does the student live at home/rely on parents/have dependants?
3. Housing: Is the student living above or below poverty/living conditions? How much of the student income goes to the household, i.e., rent, food, childcare, clothing?
4. Healthcare: Does the student have medical expenses that they are contributing a substantial amount to each month? Does the student contribute to health expenses for a family member?
5. Transportation: How does the student commute to school; personal vehicle, bus, family, etc? Does the student have monthly car payments? How far does the student commute?

Priority Nursing College will implement the following to insure student portion payments are made:

1. When the student enrolls in the program, give them the proposed/created payment form from NC works explaining what their expected portion is, to include the date of the student expected payment and consequences of not making the payment as scheduled.
2. Meet with students 1 on 1 regarding their financial obligation to the school.
3. At the completion of each course, meet with the student to discuss financial obligations and immediate payments due if any. Remind students that if they are due a payment to the school, to pay what they can, even if they can't make the whole payment. Ask about the student's plan to continue to make payments in the future, as so the student will stay on schedule in making payments. Ask the student if they plan to get any balloon income payments i.e. tax refunds.
4. The student may be able to receive educational grants from their workplace or housing complex. May sure student is aware of possibility of any supplements from housing or employment. They would need to contact their employer or housing director.
5. If a student does not make the expected payment on the arranged date, get the next expected date for payment from the student and inform the student of the importance of making the payments as scheduled. Inform the student that NC works or other funding agencies may require them to make their payment before the funding agency will continue to pay on their behalf for continued funding.
Provider: Priority Nursing College

<table>
<thead>
<tr>
<th>Term Date</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>Certification Exam</th>
<th>Totals</th>
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<tr>
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<td>4/19/16 - 6/30/16</td>
<td>7/1/16 - 9/23/16</td>
<td>9/26/16 - 12/30/16</td>
<td>1/2/17 - 3/17/16</td>
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<td>$2,623.04</td>
<td>$2,107.80</td>
<td>$125.00</td>
<td>$9,660.60</td>
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<td>$800.00</td>
<td>$800.00</td>
<td>$0.00</td>
<td>$2,400.00</td>
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<td>NCWorks Scholarship</td>
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<td>$125.00</td>
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<td>Student Balance</td>
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<td>$489.70</td>
<td>$99.47</td>
<td>$0.00</td>
<td>$938.36</td>
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</table>

Provider agrees to allocate all in-school scholarships to the total cost of tuition equally over the total number of terms for the training. All NCWorks Career Center WIOA funding will be applied equally over the course of the funding year, not to exceed maximum allowable amounts, as outlined in the Local Training Policy. Student agrees that they are fully responsible for the remaining balance of the tuition, as well as any additional costs that may be incurred throughout the training program participation. Student further agrees that all outstanding balances must be paid in full by the end of each term in order to receive continued WIOA funding.
## INVESTMENT REPORT
April 1, 2016 - May 31, 2016

### Fidelity Account

**ACCOUNT NUMBER:**

**Your Account Value:**

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<th>This Period</th>
<th>Year-to-Date</th>
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<td>Subtractions</td>
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<tr>
<td>Change in Investment Value *</td>
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<td>Ending Account Value **</td>
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<tr>
<td>Ending Account Value Incl. AI</td>
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* Appreciation or depreciation of your holdings due to price changes plus any distribution and income earned during the statement period.

** Excludes unpriced securities.

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Brokerage services provided by Fidelity Brokerage Services LLC (FBS), Member NYSE, SIPC (800) 544-6666. Brokerage accounts carried by National Financial Services LLC (NFS), Member NYSE, SIPC.
Your Business Investment Account
for May 1, 2016 to May 31, 2016

PRIORITY NURSING COLLEGE INC

Account summary

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<th>Description</th>
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<td>Beginning balance on May 1, 2016</td>
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<tr>
<td>Deposits and other credits</td>
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<tr>
<td>Withdrawals and other debits</td>
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<tr>
<td>Service fees</td>
<td>-10.00</td>
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<tr>
<td>Ending balance on May 31, 2016</td>
<td>$20,000</td>
</tr>
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</table>

Annual Percentage Yield Earned this statement period: 0.02%
Interest Paid Year To Date: $0.05

Banking at your fingertips

Our Mobile Banking app¹ can help you gain more control.

Text BizAPP to 226526 to download the app.² By texting us, you agree to receive an automated text message reply. Not a condition of purchasing any products or services.

¹ The Mobile Banking app is available on iPad, iPhone, and Android devices.² For the text message, supported carriers include: Alltel, AT&T, Cellular One, T-Mobile, Virgin Mobile, US Cellular, Verizon Wireless. Message and data rates may apply. Text STOP to 226526 to cancel and text HELP to 226526 for help. ARGAMCOW 1 3SM-02-16-0413B

SBCC
09/16/2016
### PERSONAL INFORMATION

1. **Name:**
   - Last
   - First
   - Middle
   - Former
   - City
   - Greenboro
   - State NC
   - Zip 27405

2. **Address:**
   - (Insert Address)

3. **Telephone:** (Home, Cell, Work)
   - (Insert Telephone)
   - **Security Number:**

4. **E-mail address:**
   - (Insert E-mail Address)

5. **Employment status:**
   - Full-time
   - Part-time
   - Unemployed

6. **Employer:**
   - (Insert Employer)

7. **Gender:**
   - **Female**
   - **Male**

8. **Race:**
   - **White**
   - **Black**
   - **Indian**
   - **Hispanic**
   - **Asian**
   - **Other**

9. **Date of birth:**

10. **Are you dependent on your parents?**
    - **Yes**
    - **No**

    If yes, list name and address of nearest relative:

### EDUCATIONAL INFORMATION

12. **Status:**
    - **Currently enrolled in high school**
    - **High school graduate**
    - **GED graduate**
    - **Adult high school graduate**
    - **Did not graduate**

13. **Last high school attended:**
    - (Insert School Name)

14. **High school graduation/expected graduation date:**

15. **If GED/Adult High School graduate, where earned:**

16. **If GED/AHS graduate, last school attended prior to earning GED/AHS:**

17. **Highest grade or degree completed:**
    - Circle one:
    - Grade or degree completed:

18. **List all colleges or schools attended beyond high school:**
    - (Insert College or School Name)

### RESIDENCY

19. **U.S. citizen:**
    - **Yes**
    - **No**

    **Resident:**
    - **Non-immigrant**

    For non-citizen, country of origin:

    If non-immigrant, type of visa:

20. **North Carolina legal resident:**
    - **Yes**
    - **No**

    County:

    Have you resided in North Carolina for the past 12 months?
    - **Yes**
    - **No**

    If no indicate where you resided and for what reason:

### STUDENT STATUS

22. **Purpose for enrolling:**
    - **Obtain degree**
    - **Obtain diploma**
    - **Obtain certificate**
    - **Take courses**
    - **With degree**
    - **Take courses**
    - **Transfer with Degree**
    - **Personal enrichment only**
    - **Job**
    - **Promotion/ better job**
    - **Undecided**

23. **Intended program of study:**
    - (Please include one program only)

24. **Quarter/year intending to enter:**
    - Summer (Aug 24 - Nov 7) 20
    - Fall (Nov 8 - January 30, 2020)
    - Winter (January 31 - April 16, 2020)
    - Spring (April 17 - June 30, 2020)

25. **Intend to take classes:**
    - **Day**
    - **Evening**
    - **Both day and evening**

26. **How did you hear about us?**
    - **From Friend**

I certify that the information given on this application is correct and complete. I understand that providing false or incomplete answers may result in my disqualification from my enrollment at Priority Nursing College. I agree to abide by the rules and regulations of the school where I am admitted as a student.


Signature

Date

*This is voluntary information, used for Federal reporting and has no bearing on admission to the School. Priority Nursing College is an Affirmative Action/Equal Opportunity School.*

LICENSING BY NORTH CAROLINA COMMUNITY COLLEGE SYSTEM
STATE OF NORTH CAROLINA
GUILFORD County

In The General Court Of Justice
District Court Division

Name And Address Of Plaintiff

GREENSBORO, NC 27405

VERSUS

Name And Address Of Defendant

DOUGLAS PALMER WILSON

NO-CONTACT ORDER
FOR STALKING OR
NONCONSENSUAL SEXUAL CONDUCT

This matter was heard by the undersigned district court judge, the court has jurisdiction over the parties and subject matter, and the defendant has been provided notice of the hearing.

The Court hereby finds that:

☐ 1. (If this block is checked, skip to the Order portion of the Order) This Order is entered by default for the remedy sought in the complaint because the defendant failed to ☐ file an answer ☐ appear at this hearing and the allegations in the complaint are sufficient to justify a no-contact order for stalking or nonconsensual sexual conduct.

☒ 2. Present at the hearing were: ☐ the plaintiff, represented by Jason Keith

☒ 3. The plaintiff has suffered unlawful conduct by the defendant in that:

☐ 4. Other:

CONCLUSIONS

☐ 1. The defendant committed acts of unlawful conduct against the plaintiff.

☒ 2. The plaintiff has failed to prove grounds for issuance of a no-contact order.

ORDER

It is ORDERED that:

☐ 1. The defendant shall not visit, assault, molest, or otherwise interfere with the plaintiff.

☐ 2. The defendant cease stalking the plaintiff.

☐ 3. The defendant cease harassment of the plaintiff.

☐ 4. The defendant not abuse or injure the plaintiff.

☐ 5. The defendant not contact the plaintiff by telephone, written communication, or electronic means.

☐ 6. The defendant not enter or remain present at the plaintiff's residence, place of employment, and other places listed below at times when the plaintiff is present.

List Other Places Where Defendant Ordered Not To Be

(Over)
1. Other: (specify)

8. The terms of this Order shall be effective until [ ] one (1) year from the date of this Order.
   [ ] (specify date and time if less than one year)

9. The Order is denied and the case is dismissed.

[ ] 12-17-16

12:40

NOTICE TO DEFENDANT: A KNOWING VIOLATION OF A CIVIL NO-CONTACT ORDER SHALL BE PUNISHABLE AS CONTEMPT OF COURT, WHICH MAY RESULT IN A FINE OR IMPRISONMENT. THE COURT MAY FIND YOU IN CIVIL OR CRIMINAL CONTEMPT.

I certify this Order is a true copy.

6-17-16

CERTIFICATION

NOTE TO CLERK: G.S. 50C-9 provides: "The clerk of court shall deliver on the same day that a civil no-contact order is issued, a certified copy of that order to the sheriff." The statute also provides that a copy of the order shall be issued promptly to the police department of the municipality of the victim's residence, or the sheriff and any county police department if the victim does not live in a municipality with a police department.

RETURN/CERTIFICATE OF SERVICE WHEN DEFENDANT NOT PRESENT AT HEARING

I certify that this No-Contact Order For Stalking Or Nonconsensual Sexual Conduct was received and served as follows:

[ ] By delivering to the defendant named above a copy of this Order.
[ ] By leaving a copy of this Order at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.

[ ] By mailing a copy of this Order to the defendant by [ ] registered mail. [ ] certified mail (return receipt). [ ] designated delivery service.

[ ] Defendant WAS NOT served for the following reason.

NOTE TO CLERK: G.S. 50C-9(b) provides: "If the [defendant] was not present in court when the order was issued, the [defendant] may be served in the manner provided for service of process in civil proceedings in accordance with Rule 4(j) of the Rules of Civil Procedure."
Attachment 3:

June 7, 2016 email with letter and spreadsheet attachments from the City of Greensboro to Wilson.
Mr. Wilson,

Please read the attached very important letter. Your prompt attention to this matter would be greatly appreciated.

Becky Jo Peterson-Buie  
Chief Deputy City Attorney  
City of Greensboro  
Post Office Box 3136  
Greensboro, North Carolina 27402  
(336) 373-2320  
(336) 373-2078 (fax)  
www.greensboro-nc.gov

Please note that email sent to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.
June 7, 2016

VIA FIRST CLASS MAIL AND E-MAIL
Mr. Douglas Wilson, Director
Priority Nursing College
1050 Revolution Mill Drive
Greensboro, NC 27405

Dear Mr. Wilson:

As you know, the City of Greensboro, through the Guilford County Workforce Development Board, is responsible for NCWorks Career Center-Guilford County. NCWorks Career Center-Guilford County paid Priority Nursing College $6,966.72 for three students to start medical assistant training on May 5, 2016. On May 25, 2016 charges were taken out against you for stalking and first degree trespass at the home of one of your students, Ms. [Redacted]. On June 2, 2016, a civil 50C Order was served on you by the Guilford County Sheriff's Department ordering you to have no contact with Ms. [Redacted] while the lawsuit is pending. On May 25, 2016 you also admitted to the Greensboro Police Department that you trespassed at the home of a second student, [Redacted]. The tuition for both of the aforementioned students was paid for by NCWorks Career Center-Guilford County in May, 2016.

Due to your actions on May 25, 2016, and complaints lodged by current and former students of your institution, the City has determined to end the relationship between Priority Nursing College and NCWorks Career Center-Guilford County. Therefore, send a full refund in the amount of $6,966.72 to NCWorks Career Center-Guilford County for the three students paid for in May 2016, [Redacted], and [Redacted], no later than Friday, June 17, 2016.

NCWorks Career Center-Guilford County paid Priority Nursing College a total of $15,175.24 for four students that started training on November 19, 2015, [Redacted], [Redacted], [Redacted], and [Redacted]. The aforementioned four students that started their training program on November 19, 2015 have complained that the students that began training on May 5, 2016 were put in their class for training. NCWorks Career Center-Guilford County did not expect you to merge the class that started on November 19, 2015 with the class that started on May 5, 2016 because the training is scheduled for eleven months. NCWorks Career Center-Guilford County, as well as the students that began training in May 2016 and November 2015, have serious concerns about the quality of their training. The November 19, 2015 students are also aware of the May 25th incident and have expressed concerns for their safety. In light of the concerns the students have indicated their intent to withdraw from the class. Consistent with the decision above, NCWorks Career Center-Guilford County will not provide further sponsorship for any of the seven students. NCWorks Career Center also paid $25,224.48 for five students that began their training as follows: [Redacted] and [Redacted] began their training on May 5, 2015; and [Redacted] and [Redacted] began their training on January 12, 2015. The aforementioned students completed their training.
Letter to Mr. Douglas Wilson  
June 7, 2016  
Page 2

Three of the aforementioned students that finished their training have complained that Priority Nursing College has failed and refused to provide them with the necessary documentation needed to sit for the national exam. The remaining two students have taken the national exam but did not pass.

Send the transcripts for the three students paid for in May 2016, and for the four students that began their training in November 2015, to NCWorks Career Center-Guilford County. The transcripts are needed in order to determine what work has been completed and what is needed in order for the students to finish their training. Finally, send the transcripts of the five students that completed their training in order for NCWorks Career Center-Guilford County to assist the students with steps needed to pass the national exam they will take on June 23, 2016.

In light of your actions on May 25, 2016 and our concern for the quality of the training provided to the students paid for by NCWorks Career Center-Guilford County, this is official notice that Priority Nursing will be removed from the eligible training providers with NCWorks Career Center-Guilford County. Attached for your information is a chart showing payments made by NC Works to Priority Nursing College.

Your cooperation in this very important matter would be greatly appreciated. Please have your attorney contact me if there are questions concerning this letter.

Sincerely,

Becky Jo Peterson-Buie  
Chief Deputy City Attorney

Attachments: 1

Cc: Lillian Plummer, Executive Director, Guilford County Workforce Development Board  
Chris Wilson, Assistant City Manager  
Scott Corl, Executive Director, North Carolina Community College System
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$10,000.00 $8,836.68 $12,196.76 $6,338.56 $6,966.72 $3,027.72 $47,366.44 $9,719.24 $57,085.68

and were previously enrolled with Priority Nursing prior to seeking assistance from us. The two had self paid $4,160 prior to us providing financial assistance to them. Neither students have passed national exam to date has taken the NCCT. and as part of 2 training policies that limited maximum funding amounts to them, as approved by the Local Area. and are scheduled to sit for national exam 6/23/16.
Attachment 4:

June 17, 2016 email from Wilson to Corl, providing a copy of Wilson's written response to the City of Greensboro.
Mr. Corl,

Please find our response to the City attached.

Thanks
Douglas Wilson
Director
Priority Nursing College
June 17, 2016

Ms. Becky Jo Peterson-Buie
Chief Deputy City Attorney
City of Greensboro, NC 27402

Response to Allegations and Requests Regarding Priority Nursing College:

These charges of trespassing/stalking/50C are allegations by the Greensboro Police Department and (50c allegation). I have stated and maintained that I, Douglas Wilson, have not committed any crimes against any person, place or property. It is my hope that the city of Greensboro will reverse the steps toward penalizing individuals/institutions based on an allegation/s that has not yet went through the court system and therefore a determination of guilt or innocence has yet to be determined. Because of the action taken in the letter received from the City attorney dated June 7, 2016, I believe that Priority Nursing College & Douglas Wilson has already been judged, and found guilty by the City, even though the allegations are yet to be proven in a court of law, evidenced by the steps taken to end the relationship between NC Works and Priority Nursing College.

In your letter you state “due to your actions on May 25, 2016 and complaints lodged by current and former students of your institution, the City has determined to end the relationship between Priority Nursing College and NC Works Career Center-Guilford County”. No allegations of wrongdoings have not been substantiated in a court of law. No court rulings have taken place regarding any of the alleged charges. All the allegations of wrongdoing are alleged by one student: A civil 50C order (has not been to court), or the Greensboro Police Department; trespassing and stalking (have not been to court). You also stated that I admitted to the Greensboro Police Department of trespassing upon the home of another student. I did not admit to the Greensboro Police Department of trespassing upon the home of another student nor did I trespass at the home of any students. This is Libel and a malicious attempt to discredit Priority Nursing College as a credible institution that has been serving the community since 2004 and against it Chief officer; Douglas Wilson, who has served as the Administrator/Director/Instructor since 2004 as a person of good moral character.

Update: June 17, 2016 by the State of North Carolina by the honorable Judge Angela C. Foster listed under her conclusions: The plaintiff has failed to prove grounds for issuance of a no-contact order and under order listed #9. The Order is denied and the case is dismissed. (See attachment: NOTICE OF HEARING ON NO-CONTACT ORDER FOR STALKING OR NONCONSENSUAL SEXUAL CONDUCT).
Emails sent to Students:

Priority Nursing College has sent emails to all students (Except because of pending court proceedings) regarding the May 25 incident and reassured them that Douglas Wilson was acting in the best interest of the school and that he committed no wrongdoing. The email sent reads “During the past week you may have heard information regarding me at the school, I assure you I was acting in the best interest of the school and will continue to carry out my legal and professional responsibilities of the school in manner that best represents the school and community. I am more than willing to sit down with you and discuss moving forward. You are a great student and I would like to see you succeed.”

Complaints:

A formal complaint was lodged against Mr. Christopher Rivera, Project Director of NC Works Career Center-Guilford County, on February 13, 2016 by Priority Nursing College (See attachment). I requested to receive the outcome of the complaint prior to May 24 but never received a follow-up with Ms. Plummer; Executive Director NC Works (See attached email dated Feb 15, 2016. See letter dated Feb 13, Complaint).

I believe the alleged charges by and the Greensboro Police Department led to the rush to judgment by the City of Greensboro to find Priority Nursing College guilty of alleged allegations, and at the same time provided an opportunity for the City to discontinue the already strained relationship that Priority Nursing College and NC Works had. I believe in the steps taken by the City to discontinue its relationship with Priority Nursing College, it has failed to provide due diligence to Douglas Wilson and Priority Nursing College and taken away the presumed right of innocence until proven guilty of all allegations. The course of action that the city has decided to take by-passes the due process of the law that is supposed to be afforded to all individuals that until proven guilty by a court of law a presumption of innocence prevails. Priority Nursing College was not given an opportunity to respond to the determination of the City to end the agreement with Priority Nursing College and the ultimate removal of Priority Nursing College as an eligible provider but was instead penalized by letter sent by the City attorney ending the relationship between Priority Nursing College and NC Works. Priority Nursing College has not been afforded due process by the City, State and Federal law and will seek to protect our institution from what we consider illegal and unfair treatment of a Small Minority Owned Business from unfair business practices by the City of Greensboro.

Furthermore Priority Nursing College had reached out to the Executive Director/Ms Lillian Plummer on May 2, 2016 by email (see attached email dated May 2, 2016) and requested a copy of the Policies/Procedures and Guidelines for eligible providers so that Priority Nursing College would be in compliance when serving as an eligible provider. Priority Nursing College never received any Policies and Procedures / Guidelines for eligible providers from Ms. Plummer or representative of NC Works.
Regarding Enrollment:

I met with Mr. Christopher Rivera (Project Director, NC Works Career Centers-Guilford County) in May 2015 when we were initially being approved as an eligible provider for NC Works. He asked about our enrollment process. He was told that PNC has a continuous enrollment program which means that students can enroll at various points in the curriculum of an ongoing program. Our Medical Assistant program consists of 16 individual courses. Regardless of when a student enrolls in the program, all 16 individual courses must be completed in order to successfully complete the Medical Assistant program by each student.

In our meeting, Mr. Rivera also asked if students owed money at the completion of the program what would happen. I informed Mr. Rivera that if a student did owe money at the completion of their program, the certificate of completion for the program would be withheld until the student's financial obligation to the school was met and this information is in their enrollment agreement which the student signs upon enrollment.

Based on the information given to Mr. Rivera, Priority Nursing College students were able to apply for funding from NC Works.

At the conclusion of the meeting; no Policies/Procedures/Guidelines were covered or given to Priority Nursing College regarding eligible providers. No expectations were given verbally or written regarding outcomes/placement rates that Priority Nursing College should or would need to follow related to its completers and the continued participation as an eligible provider for NC Works.

Priority Nursing College Status Changed from Active to Inactive:

March 8, 2016. Priority Nursing College was placed on inactive status as an eligible provider for NC Works by Ms. Plummer (Executive Director, NC Works Development Board). The reason for being placed on inactive status given by Ms. Plummer - she requested documents about student finances be sent to her and she never received those documents- In our interpretation of her email (February 15, 2016 email. Attached), we were to bring the documents to the upcoming scheduled meeting March 2 (later cancelled by her and rescheduled).

Priority Nursing College learned of being placed on inactive status as an eligible provider March 8, 2016 upon hearing from a student who went to NC Works to apply for funding for education to attend Priority Nursing College. An NC Works representative told the prospective student that Priority Nursing College applicants were no longer eligible to apply for financial assistance. I contacted Ms. Plummer on March 8, 2016 to ask why our potential students could no longer apply for eligibility to get financial assistance. Ms. Plummer replied that she had not received the requested documents from Priority Nursing College. I informed Ms. Plummer that my interpretation of the requested documents based on her email, was that we were to bring the documents to the meeting; not by email. Once I obtained clarification of delivery method requested by Ms. Plummer, I informed her that I would scan and send the documents immediately by email. Ms Plummer's response was to just bring them to the meeting on March 16 instead of emailing them. Our attorney advised us to send the documents immediately by email in which we did. Once the documents were sent, I asked for confirmation, which I received from Ms. Plummer.
On March 16, 2016, I, Mr. Rivera, Lillian Plummer, Valerie Thompson-Horton and our attorney met for a meeting at NC Works called for by Ms. Plummer. This meeting was scheduled to discuss the accounting activity of monies received on behalf of the students sponsored by NC Works; Priority Nursing College being put on Inactive status along with any other concerns that NC Works voiced. The complaint about Mr. Rivera was also discussed. In the meeting, Mr. Rivera inquired again about what would happen if the student owed money to the school after they completed the program. Again Mr. Rivera was told that the certificate would be withheld until the student completed their financial obligations to the school. This was confirmed by our attorney. At the conclusion of the meeting and review of the documents requested by NC Works/discussions regarding concerns of the program, Priority Nursing College status was returned to Active status as an eligible provider for NC Works and students who wish to attend PNC could start applying for eligibility for sponsorship again per Ms. Plummer.

I received an email from Ms. Plummer dated April 11, 2016 (See email dated April 11) stating “all sponsorships be referred to her for review until such time as I understand the manner in which we are funding your program to include certification outcomes and placement results”. Our response: We sent estimated cost documents and updates to students April 12, 2016 (See attached email dated April 12, 2016). Another update on student status was sent April 22, 2016 (see email dated April 22).

Our next start date for new students entering the MA program was April 19, 2016. 4 students had applied and met all eligibility requirements to get funding through NC Works. The students were awaiting Mr. Rivera’s final approval and were calling the school a few days prior to April 19 because they had not yet received final approval by Mr. Rivera and were very concerned about missing the April 19 deadline. By April 19 no approvals for the 4 students had been approved by Mr. Rivera. I was told by multiple students that they had contacted representatives of NC Works i.e. Richard Wright and others including the NC Department of Commerce regarding their approval for funding and were told by NC Works representatives that they had met all the eligibility requirements but were awaiting final approval by Chris Rivera. I was also told that a NC Works representative, Richard Wright, informed students while they were waiting for final approval to choose another school other than Priority Nursing College to attend.

On May 4 Ms. Plummer sent Priority Nursing College an email (Attached May 4, 2016). In the email she mentioned that all students in the Medical Assistant program have been sponsored by NC Works (which is not true). Priority Nursing College has enrolled medical assistant students since 2013. NC Works started sponsoring PNC students in May 2015. Ms. Plummer also indicated that 4 students were presently under consideration. In this email (Attached May 4, 2016), Ms Plummer states that NC Works will not sponsor any additional students until PNC can provide some performance outcomes and there is a review of the training policy application as it was intended. It goes on to state that they have made exceptions to our process to pay the student share for the three completers and do not intend to continue that practice.
It is worth noting that Priority Nursing College provided payment plans/agreements to NC Works that the 3 completers had agreed to pay on their own behalf to the school by signed signature when they enrolled to PNC. After documentation was provided to NC Works about the 3 student agreements to pay their own due portion, NC Works voluntarily made the decision to make the students' last payment.

Priority Nursing College believes that NC Works had already planned not to sponsor any more students before the May 25 incident as evidenced by the email dated May 4 sent by Ms. Plummer. Priority Nursing College had previously requested a copy of the Polices/Procedures/Guidelines for eligible providers on May 2. PNC never received any Polices/Procedures/Guideline so that it could in fact stay in compliance as being an eligible provider. Priority Nursing College did upon request provide the requested information regarding student outcomes/placement (Attached email dated April 12) to Ms. Plummer and once the information was supplied to Ms. Plummer; 3 of the 4 four students that were awaiting approval, eventually received sponsorship by NC Works.

PNC believes the withdrawal of most of the 7 students (most tuition due was to be paid by NC Works) was influenced and orchestrated by NC Works by applying pressure to most if not all of the students to withdraw from our program with the threat of cutting off funding for those students. I believe this to be a form of bullying and injustice to those students who did wanted to continue in the program.

Paid Used Tuition, Registration, Books:

* has used tuition in the amount of $573.79; CPR Training $55.00; books in the amount of $282.00; school Logo $20; registration fee $100.00 totaling $1,030.79

* has used tuition in the amount of $585.50; school Logo $20; CPR Training $55.00, books in the amount of $282.00; registration fee $100.00 totaling $1,042.50

* has used tuition in the amount of $585.50; CPR training $55.00; books in the amount of $282.00; School Logo $20; registration fee $100.00 totaling $1,042.50

National Exams:

Two students that have taken the national exam have informed me that they did indeed past the national examination. As of this date, out of all the students funded in whole or part by NC Works who has successfully completed the MA program and sit for national testing only 1 student did not pass the national examination.

The students who successfully completed the program at Priority Nursing College have been given all the documentation needed to sit for national certification.
Policies/Procedures/Guidelines Requested:

May 2, 2016 I sent an email to Ms. Plummer asking her to send PNC a copy of the Policies/Procedures and Guidelines for eligible providers from NC Works so that Priority Nursing College could ensure it is following all policies and procedures for eligible providers. Priority Nursing College never received a copy of Policies and Procedures/ Guidelines for Eligible Providers.

Transcripts:

The students would need to request a transcript. In addition; [redacted], [redacted], [redacted] and [redacted] have financial obligations to the school that must be successfully met prior to the release of their transcripts.

In Closing, Priority Nursing College respectfully requests a reversal to the City determination to end the relationship with Priority Nursing College and be placed back on the Eligible Provider list as an Active Eligible Provider. We believe the allegations by one student and very vague complaints by current and former students reported by NC Works are baseless and lack merit. Priority Nursing College believes that it has been treated unjust and unfairly and a rush to judgment by the City to terminate Priority Nursing College’s relationship with NC works and from being an eligible provided has been made.

Douglas Wilson
Priority Nursing College
Director
Mr. Wilson:

I think it is time to sit face-to-face and discuss the nature of the complaints that have been received. I will have my Assistant, Ms. Comer, try to find a time that we can meet that will accommodate both your schedule, Mr. Rivera, and Ms. Valerie Horton. Ms. Comer is out today and will work on this tomorrow.

In the interim, please pull for us an accounting of the actually charges for all of the students that we have sponsored. Please include the amount students owe or owed when completing the training. Any other pertinent information you can provide will be appreciated.

That is fine. I would like to ensure that the complaint against Mr. Rivera is filed and would like a copy of its findings when completed. I also would like to know if I would need to address the complaint to his immediate supervisor or if addressing it to you was the correct procedure for filing complaints.

Thank you.

Doug Wilson
Director

Please forward me something in writing that addresses the specific complaints that you have against Mr. Rivera. From our telephone conversation, I understood that you were concerned that he told you he would address the student complaints with
February 13, 2016

Ms. Lillian Plummer: Director
342 N. Elm St - Suite 8
Greensboro, NC 27401

Complaint: Regarding Mr. Rivera

Good Afternoon Ms. Plummer:

I called you on 2/10 about a concern I had with an email and phone call with Mr. Rivera. I am forwarding you the email. In the email Mr. Rivera subjects it “Student Complaints” (one student), but in the email it goes on to say numerous calls from customers but does not indicate what the nature of the other numerous calls from customers are. I believe this is a malicious attempt to make any reader of the email (Ms. Debbie Normandia included) see Priority Nursing College in a negative light and an attempt to build a foundation to start the process to pursue termination of ResCare services with Priority Nursing College. I also believe the concern was from one student and not numerous students as implied.

As I stated to you on 2/10, once I received the email (2/9), I called Mr. Rivera to address the concerns (I did not get any previous voicemails from him regarding complaints, although he said he tried to leave one but was unable to). In our conversation he said he wanted to discuss some concerns that he had received from customers. He mentioned a student that thought that she did not have a balance with the school, and he wanted to make sure that the money from ResCare was being used toward sponsored students tuition. I assured Mr. Rivera that it was being used for the student’s tuition and that the students received statements as to how much ResCare had paid towards their tuition. Mr. Rivera was also told that the students sign an enrollment agreement form before starting the program.

The second concern was that the students were not receiving all of their books from the school. I informed Mr. Rivera that the student did receive every book that she was supposed to receive for the MA program. I also told Mr. Rivera that Priority Nursing College has supplement books (reference materials) that the school uses but these are not books given to students, they are only to be used as references for class purposes.

Third concern was about a 1098 form not being given to the student (This is an internal school issue and should solely be addressed by the school). I told Mr. Rivera we don’t give out 1098 forms but we do give out statements regarding what the student has paid and ResCare payments. After talking with Mr. Rivera and discussing the concerns, Mr. Rivera seemed to be satisfied.
with the responses to the concerns but then stated “Doug I just want to give you a heads up that this will be going in front of the board for review and doing the review period you may not be able to get sponsorships for students”. He also asked about how many students are currently being sponsored.

Based on the email and conversation I had with Mr. Rivera, I believe Mr. Rivera had already come to a foregone conclusion as to what his next steps would be before talking with me about the concerns.

Priority Nursing College feels that it is being treated in an improper and unjust manner and believes that an attempt to deny Priority Nursing College due process has been made by Mr. Rivera.

Thanks for looking into this concern.
Douglas Wilson
Director
(336) 272-4952
Priority Nursing College/Request for Policies and Procedures Guidelines for Eligible Provider...

Douglas Wilson <prioritynursing@bellsouth.net>  May 2 at 3:32 PM

To: Lillian Plummer

Please send us a copy of the Policies/Procedures and Guidelines for eligible providers so that Priority Nursing College can ensure it is following all policies and procedures for eligible providers.

Thanks
Doug Wilson
Director
Priority Nursing College

Click to reply all
SBCC
09/16/2016

Student complaints (6)

Christopher Rivera: Hi Doug, I have been at  

Douglas Wilson: Hi Chris, I have not received  

Douglas Wilson: On Tuesday, February 9, 20  

Douglas Wilson: On Tuesday, February 9, 20  

Plummer, Lillian: <Lillian.Plummer@greenboro-nc.gov> Feb 15 at 11:21 AM  

To: Douglas Wilson  

CC: Christopher Rivera; Thompson-Horton, Valerie; Comer, Sharline  

Mr. Wilson:  

I think it is time to sit face-to-face and discuss the nature of the complaints that have been received. I will have my Assistant, Ms. Comer, try to find a time that we can meet that will accommodate both your schedule, Mr. Rivera, and Ms. Valerie Horton. Ms. Comer is out today and will work on this tomorrow.  

In the interim, please pull for us an accounting of the actually charges for all of the students that we have sponsored. Please include the amount students owe or owed when completing the training. Any other pertinent information you can provide will be appreciated.  

Douglas Wilson  

Plummer, Lillian: <Lillian.Plummer@bellsouth.net> Feb 15 at 11:37 AM  

To: Plummer, Lillian  

Mr. Plummer,  

That is fine. I would like to ensure that the complaint against Mr. Rivera is filed and would like a copy of its findings when completed. I also would like to know if I would need to address the complaint to his immediate supervisor or if addressing it to you was the correct procedure for filing complaints. Thank you.  

Doug Wilson  

Director  

Plummer, Lillian: <Lillian3|Plummer@greenboro-nc.gov> Feb 15 at 12:05 PM  

To: Douglas Wilson  

Please forward me something in writing that addresses the specific complaints that you have against Mr. Rivera. From our telephone conversation, I understood that you were concerned that he told you he would address the student complaints with  

https://us-mg5.mail.yahoo.com/neo/launch?partner=sbc&.rand=4t9h0ppotz20o  

3/12/2016
I have requested that future referrals for sponsorship be referred to me for review until such time as I understand the manner in which we are funding your program. I would first like to know the results of the three students that we provided additional funding, to include certification outcomes and placement results.

I have also reviewed the three requests that are currently under consideration and will send you a written decision on funding within the next couple of days. After you receive my interpretation of an appropriate funding approach, then I suggest that we schedule another meeting to confirm how we will do business under the current policies.

Please note that email sent to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

To Douglas Wilson
Subject: Request for Sponsorship
Date: Apr 11 at 2:30 PM

Mr. Wilson,

I have requested that future referrals for sponsorship be referred to me for review until such time as I understand the manner in which we are funding your program. I would first like to know the results of the three students that we provided additional funding, to include certification outcomes and placement results.

I have also reviewed the three requests that are currently under consideration and will send you a written decision on funding within the next couple of days. After you receive my interpretation of an appropriate funding approach, then I suggest that we schedule another meeting to confirm how we will do business under the current policies.

Please note that email sent to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.
Good Morning Ms. Plummer:

I know that you are very busy, so I wanted to send you an email instead of calling this early.

I am responding to your email. To address the results of the 3 students that additional funding was supplied on their behalf.

1. Ms. Plummer, Mr. Wilson, I have requested that the school be aware of an exam the student who received a list of job contacts and was instructed to keep in contact with the school for future job referrals.

2. Ms. Plummer received her certificate on March 17. Ms. Plummer had already informed us that they would pay her remaining balance. Mrs. Wilson did receive a list of job contacts and was instructed to stay in contact with the school for future job referrals.

3. Ms. Plummer was the first of the three to receive her certificate after ReseCare informed us that they would pay her remaining balance. Mrs. Plummer did receive a list of job contacts and was instructed to stay in contact with the school for future referrals. Ms. Plummer indicated that she would be taking the national exam and was told to contact the school to give results of examination.

At this date, none of the 3 students have contacted Priority Nursing College to inform of certification results or employment. We try to continuously stay in contact with our students and will keep attempting to contact them for results on testing and employment. We will also send the students job contacts as employers contact us, or any information we feel may be beneficial to the student on their path to employment and success.

I am sending you copies of documents that we have given our potential students for the April 19 class to better inform them of costs associated...
I am sending you copies of documents that we have given our potential students for the April 19 class to better inform them of costs associated with the program; Please see attached documents and explanation:

I have attached Document 1-Titled: Estimated Cost of the April 19 Program. This document was given to the students to give them an estimate of what their cost would be per term.

I have also attached Document 2-Titled: Estimated Cost Overall of the April 19 Program to include Scholarships and Sponsorships: This document was given to the students to give them an estimate of what their costs would be after Sponsorships and Scholarships applied and gives them the expected amount that they would be required to pay out of pocket.

Per our meeting on March 16, it was requested by ResCare to give the students more information on what their cost would be so students could make a more informed decision about their education. By giving students Estimated Cost Documents, Priority Nursing College is making the students more informed and therefore being put in a better position to make decisions that are in their best interest.

Thanks for working with us as we continue to provide the best and brightest students, the education they deserve.

If you have any other questions, I am more than happy to answer any and all questions to facilitate the best working business relationship between Priority Nursing College and ResCare.

Sincerely,
Douglas Wilson
Director
Priority Nursing College
Priority Nursing College

1050 Revolution Mill Dr
Greensboro, NC 27405
Phone 336 272-4952
Fax: 336 336-7300

Email: nnltr@prioritynursingcollege.com
Web: www.prioritynursingcollege.com

Estimated Cost of Tuition & Supplies for the MA Program:

April 19-June 30, 2016
Medical Math, Pharmacology, Phlebotomy Concepts, Keyboarding: $1,685.24 Registration $100.00, Books $399.00, CPR $55.00, Criminal Background Check $20, Urine Drug Screen $42.00, Logo $20. ($10 each). Total cost for this term: $2,322.24

Items needed that the school does not sell:
*Uniforms $45.00 (Estimated price of at least 2 uniforms) Tennis shoes or nurse shoes (Estimated at $45.00) Stethoscope/BP Cuff $25.00, (Estimated) Watch with second hand $10.00 (Estimated)
Immunizations (MMR, Varicella, TB, Tetap, FLU, Price vary depending on what you need)

July 1-September 23, 2016:
Medical Office Business Procedures I, Medical Office Business Procedures II, Medical Billing & Collections, Introduction to Medical Assisting, Medical Law & Ethics, Medical Terminology $2,482.52.

September 26-December 30, 2016:

January 2-March 17, 2017:
Medical Assistant Certification Review, Medical Assisting Internship, $2,107.80
Medical Assistant Exam $125.00.
Priority Nursing College

1050 Revolution Mill Dr
Greensboro, NC 27405
Phone: 336-272-4952
Fax: 336-338-7300

Email: tblisi@prioritynursingcollege.com
Web: www.prioritynursingcollege.com

Estimated Cost of Tuition & Supplies for the MA Program:

April 19 - June 30, 2016
Medical Math, Pharmacology, Phlebotomy Concepts, Keyboarding: $1,686.24 Registration $100.00,
Books $399.00, CPI $55.00, Criminal Background Check $10, Urine Drug Screen $12.00, Legals $20. ($10 each). Total cost for this term: $2,322.24

Items needed that the school does not sell:
*Uniforms $45.00 (Estimated price of at least 2 uniforms) Tennis shoes or nurses shoes (Estimated at $45.00) Stethoscope/BP Cuff $25.00, (Estimated) Watch with second hand $10.00 (Estimated)
Immunizations (MMR, Varicella, TB, Typh, Flu, Prices vary depending on what you need)

July 1 - September 30, 2016:
Medical Office Business Procedures I, Medical Office Business Procedures II, Medical Billing &
Collections, Introduction to Medical Assisting, Medical Law & Ethics, Medical Terminology
$2,482.52

September 26 - December 30, 2016:
Anatomy and Physiology: Body Structures, Anatomy & Physiology: Organs & Systems, Medical Office
Clinical Procedures I, Medical Office Clinical Procedures II, $2,623.04. If ResCare paid the 2,482.52 there
would be $3,517.48 remaining to be applied to this term. $2,623.04 - $1,517.48 leaving the student with
a balance of $1,105.56. The in school scholarship would then apply and would pay off the $1,105.56
balance

January 2 - March 17, 2017:
Medical Assistant Certification Review, Medical Assisting Internship, $2,107.90
Medical Assistant Exam $125.00. Total $2,232.80-$1,294.46 = $938.34 Remaining Balance for student.
Priority Nursing College Student Updates: (7)

Douglas Wilson, Director, Priority Nursing College

To: Ms. Plummer

CC: admin@priortynursingcollege.com

Good Afternoon Ms. Plummer,

I spoke to you on 4/15/16. She has had 3 job interviews. She is currently waiting to take the national exam. She called this morning: (4/22/16). Update on her status with testing; Still waiting to test.

I spoke with last week and she is also waiting to take the exam. She stated that she is working with getting a job with her daughter’s doctor office, that they like her and are very interested in her working there.

I have left voicemails for, but no response.

No students that have requested financial assistance from the WIOA have signed loans with Priority Nursing College.

If you have any questions, I am more than happy to answer them.

Sincerely,

Doug Wilson
Priority Nursing College
Director

(336) 272-2952

Ms. Plummer,

It means that they have registered to take the exam and are awaiting a test date from the testing agency.

Thanks.

Doug Wilson
Priority Nursing College
Director

[Conversation continuation]
Sponsorship - Priority Nursing (5)

Plummer, Lillian <Lillian.Plummer@greensboro-nc.gov>
To: "Douglas Wilson"
CC: Thompson-Horton, Valerie; 'Christopher Rivera'

Mr. Wilson:

We have given serious consideration to the applications of the individuals who have requested sponsorship from the NCWorks system. There are several areas of concern that we have discussed:

- To date we have provided sponsorship for ten students who have either completed or are close to completion of the training. The three students that have completed either have not taken their exams or we have not seen the results. This means we have no outcome data related to the training, credentialing, or subsequent employment.
- Students who participate in the training must pay a portion of the training in order to receive the letter of completion required to take the credential exam. It is not the intent nor our practice of sponsoring students who must go into debt in order to take your training.
- As you indicated in a prior discussion, your Certified Medical Assistant training students have all been sponsored by the NCWorks system. This means that if we are not sponsoring or have to reduce our sponsorship, the trainees have an even greater burden in participating.
- We currently have under consideration sponsorship for four students who have communicated that they cannot start the class until they have been approved, confirming that we are your primary or only source of trainees. After careful consideration we have worked through a sponsorship model to assist the four students under consideration.

This model is based on the premise that:

1. we will fund the cost of the first term in full and will assist with extraordinary costs (ie uniforms, shoes) if purchased in the first quarter,
2. we will provide an equal scholarship over each the next three terms contingent upon you applying the $2400 in-school scholarship in the same equal share formula,
3. the student pays their balance during the first three quarters or in a manner that the student share is paid in full prior to completion of the training and prior to the last installment of the NCWorks scholarship, and
4. This model is spelled out in the attached spreadsheet and will apply only to the four students currently waiting a sponsorship decision.

Please be advised that NCWorks will not sponsor any additional students until you can provide some performance outcomes and there is a review the training policy application as it was intended. Please review the attached spreadsheet and contact me if you have questions or concerns. I believe this process is fair and in the best interest of the students. We have already made exceptions to our process to pay the student share for the three completers, and do not intend to continue that practice. Nor will we provide sponsorship in situations that create a hardship for persons who are in come to our system because of barriers and/or economic challenges.

Should you have questions, please contact me. I am working on a time sensitive project, but will get back to you within 24 hours so that the students are not out of limbo.

Please note that email sent to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.
Attempted Use of my Personal Credit Card, ATM Card and Business Card.

Was attempted at the cash points 1941 Coliseum Blvd which is part of the Credit Union.

1. $200 attempted x1 at 12:33 am
2. $300 attempted x4 at 12:33 am
3. $80 attempted x5 at 12:33 am

The personal credit card was also tried at Citgo 31151081. 3512 Kivett Dr High Point NC 27620. Phone 336 886-2009. I spoke to Dustin and he said would contact his Mgr to sit up a time to view camera. Antonio is the Mgr.

Attempted $1.00 x 4 at this location May 25th at 2:19 am.

My personal ATM card

1. May 25 at 2:19 am $95. Attempted at Shell Station, Greensboro store 584 58701
2. May 25th at 1:42 am of $100. happened at Family Fare on Church St. 2750 North Church St
3. May 25th at 1:38pm $91. at Circle K 101 pisgah church rd, Greensboro NC
4. May 25th at 1:42pm $100. Family fare 2750 N Church St
5. May 25th at 1:44pm $100. Family Fare 2750 N Church St
6. May 25th at 2:19pm $95.00 Shell station in Greensboro, store # 584 58701
6. May 25th at 12:44am $40. 1941 Coliseum Boulevard /Cashpoints

Business Debt Card Attempts:

Attempted to purchase through paypal which was blocked at 1:46am on May 25. 1 888 221-1161

Also stolen $35.00 cash
In the General Court Of Justice
District Court Division

NO-CONTACT ORDER
FOR STALKING OR
NONCONSENSUAL SEXUAL CONDUCT

This matter was heard by the undersigned district court judge, the court has jurisdiction over the parties and subject matter, and the defendant has been provided notice of the hearing.

The Court hereby finds that:

☐ 1. (If this block is checked, skip to the Order portion of the Order.) This Order is entered by default for the remedy sought in the complaint because the defendant failed to ☐ file an answer ☐ appear at this hearing and the allegations in the complaint are sufficient to justify a no-contact order for stalking or nonconsensual sexual conduct.

☑ 2. Present at the hearing were: ☑ the plaintiff, represented by Jason Keith

☐ 3. The plaintiff has suffered unlawful conduct by the defendant in that:

☐ 4. Other:

CONCLUSIONS

☐ 1. The defendant committed acts of unlawful conduct against the plaintiff.

☑ 2. The plaintiff has failed to prove grounds for issuance of a no-contact order.

ORDER

☑ 1. The defendant shall not visit, assault, molest, or otherwise interfere with the plaintiff.

☐ 2. The defendant cease stalking the plaintiff.

☐ 3. The defendant cease harassment of the plaintiff.

☐ 4. The defendant not abuse or injure the plaintiff.

☐ 5. The defendant not contact the plaintiff by telephone, written communication, or electronic means.

☐ 6. The defendant not enter or remain present at the plaintiff's residence, place of employment, and other places listed below at times when the plaintiff is present.

List Other Places Where Defendant Ordered Not To Be

(Over)

AOC-CY-52A, Rev. 10/15
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SBCC
09/16/2016
7. Other: (specify)

8. The terms of this Order shall be effective until [ ] one (1) year from the date of this Order.
   [ ] (specify date and time if less than one year)

9. The Order is denied and the case is dismissed.

Date: 09-17-16

Time: 12:40

Name of District Court Judge (type or print): Angela C. Foster

Signature of District Court Judge:

NOTICE TO DEFENDANT: A KNOWING VIOLATION OF A CIVIL NO-CONTACT ORDER SHALL BE PUNISHABLE AS CONTEMPT OF COURT, WHICH MAY RESULT IN A FINE OR IMPRISONMENT. THE COURT MAY FIND YOU IN CIVIL OR CRIMINAL CONTEMPT.

CERTIFICATION

I certify this Order is a true copy.

Date: 09-17-16

Deputy CSC

Clerk Of Superior Court

NOTE TO CLERK: G.S. 50C-9 provides: "If the defendant was not present in court when the order was issued, the defendant may be served in the manner provided for service of process in civil proceedings in accordance with Rule 4(J) of the Rules of Civil Procedure."

RETURN/CERTIFICATE OF SERVICE WHEN DEFENDANT NOT PRESENT AT HEARING

I certify that this No-Contact Order For Stalking Or Nonconsensual Sexual Conduct was received and served as follows:

Date Served

Time Served

Name Of Defendant

☐ By delivering to the defendant named above a copy of this Order.

☐ By leaving a copy of this Order at the dwelling house or usual place of abode of the defendant named above with a person of suitable age and discretion then residing therein.

Name And Address Of Person With Whom Copies Left

☐ By mailing a copy of this Order to the defendant by ☐ registered mail. ☐ certified mail (return receipt). ☐ designated delivery service.

☐ Defendant WAS NOT served for the following reason.

Date Received

Signature Of Deputy Sheriff Making Return

Date Of Return

Name Of Sheriff (type or print)

Date Mailed

County Of Sheriff

Signature Of Clerk

County Of Sheriff

Deputy CSC

Assistant CSC

Clerk Of Superior Court

NOTE TO CLERK: G.S. 50C-9(b) provides: "If the defendant was not present in court when the order was issued, the defendant may be served in the manner provided for service of process in civil proceedings in accordance with Rule 4(J) of the Rules of Civil Procedure."

AOC-CV-524, Side Two, Rev. 10/15
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SBCC
09/16/2016
Attachment 5:

July 22, 2016 email and letter from the City of Greensboro to Wilson.
Mr. Wilson,

Attached is the City of Greensboro’s response to your letter dated 6/17/16. Your cooperation in this matter would be greatly appreciated.

Sincerely,

Becky Jo Peterson-Buie
Chief Deputy City Attorney
City of Greensboro
Post Office Box 3136
Greensboro, North Carolina 27402
(336) 373-2320
(336) 373-2078 (fax)
www.greensboro-nc.gov

Please note that email sent to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.
July 22, 2016

VIA FIRST CLASS MAIL AND E-MAIL
Mr. Douglas Wilson, Director
Priority Nursing College
1050 Revolution Mill Drive
Greensboro, NC 27405

Dear Mr. Wilson:

This will acknowledge receipt of your letter dated June 17, 2016. Please be advised, the City of Greensboro stands by its position to end the relationship between Priority Nursing College and NCWorks Career Center-Guilford County.

Sincerely,

[Redacted]
Becky J. Peterson-Buie
Chief Deputy City Attorney

cc: Lillian Plummer, Executive Director, Guilford County Workforce Development Board
Chris Wilson, Assistant City Manager
Jim Westmoreland, City Manager
Tom Carruthers, City Attorney
Scott Curl, Executive Director, North Carolina Community College System
Attachment 6:

July 25, 2016 email and letter from Wilson to the City of Greensboro.
Ms. Peterson,

Please read the attached request.

Thank You
Doug Wilson
Director
Priority Nursing College

On Monday, July 25, 2016 7:08 AM, Douglas Wilson <prioritynursing1@bellsouth.net> wrote:

Ms. Peterson,

Please read the attached request.

Thank You
Doug Wilson
Director
Priority Nursing College

On Friday, July 22, 2016 4:22 PM, "Peterson-Buie, Becky" <Becky.Peterson-Buie@greensboro-nc.gov> wrote:

Mr. Wilson,

Attached is the City of Greensboro's response to your letter dated 6/17/16. Your cooperation in this matter would be greatly appreciated.

Sincerely,

Becky Jo Peterson-Buie
Chief Deputy City Attorney
City of Greensboro
Post Office Box 3136
Greensboro, North Carolina 27402
(336) 373-2320

SBCC
09/16/2016
Please note that email sent to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.
Priority Nursing College

1050 Revolution Mill Dr
Greensboro, NC 27405
Phone 336 272-4952
Fax: 336 338-7300
Email: sales@prioritynursingcollege.com
Web: www.prioritynursingcollege.com

July 25, 2016

Ms. Becky Jo Peterson-Buie
Chief Deputy City Attorney
City of Greensboro, NC 27402

Ms. Peterson

Priority Nursing College would like to file an appeal to the city determination to end its relationship with Priority Nursing College. We are requesting appeal procedures to include filing complaints/grievances against this determination and the City of Greensboro. Please forward all information that PNC will need in order to file properly and person/s of contact names and locations of whom the appeal/complaints/grievances should be addressed. Our attorney is Ken Keller, who sat in with our previous meeting with NC Works.

Thank you

Douglas Wilson
Director
Priority Nursing College
Attachment 7:

Three (3) ECC Course Evaluation forms and four (4) Student Evaluation Forms provided by Wilson to the Office of Proprietary Schools.
ECC Course Evaluation
for ACLS, BLS for Healthcare Provider
and PALS Classroom Courses

Please answer the following questions about your Instructor.

My Instructor:
1. Provided instruction and help during my skills practice session
   a. Yes
   b. No
2. Answered all of my questions before my skills test
   a. Yes
   b. No
3. Was professional and courteous to the students
   a. Yes
   b. No

Please answer the following questions about the course content.
1. The course learning objectives were clear.
   a. Yes
   b. No
2. The overall level of difficulty of the course was
   a. Too hard
   b. Too easy
   c. Appropriate
3. The content was presented clearly.
   a. Yes
   b. No
4. The quality of videos and written materials was
   a. Excellent
   b. Good
   c. Fair
   d. Poor
5. The equipment was clean and in good working condition.
   a. Yes
   b. No

Please answer the following questions about your skill mastery.
1. The course prepared me to successfully pass the skills session.
   a. Yes
   b. No
2. I am confident I can use the skills the course taught me.
   a. Yes
   b. No
   c. Not sure

3. I will respond in an emergency because of the skills I learned in this course.
   a. Yes
   b. No
   c. Not sure
4. I took this course to obtain professional education credit or continuing education credit.
   a. Yes
   b. No

Optional questions:
Have you previously taken this course via another method, such as in a classroom or online?
Which learning method do you prefer and why?

______________________________

______________________________

______________________________

Were there any strengths or weaknesses of the course that you would like to comment on?

______________________________

______________________________

______________________________

What would you like to see in future courses developed by the AHA?

______________________________

______________________________

______________________________

Upon completion:
Please email this form to

Instructor or Training Center

or mail to
American Heart Association
ECC Training Department
7272 Greenville Ave.
Dallas, TX 75231

SBCC 09/16/2016
ECC Course Evaluation
for ACLS, BLS for Healthcare Provider and PALS Classroom Courses

Please answer the following questions about your Instructor:

My Instructor:
1. Provided instruction and help during my skills practice session
   a. Yes
   b. No

2. Answered all of my questions before my skills test
   a. Yes
   b. No

3. Was professional and courteous to the students
   a. Yes
   b. No

Please answer the following questions about the course content.
1. The course learning objectives were clear.
   a. Yes
   b. No

2. The overall level of difficulty of the course was
   a. Too hard
   b. Too easy
   c. Appropriate

3. The content was presented clearly.
   a. Yes
   b. No

4. The quality of videos and written materials was
   a. Excellent
   b. Good
   c. Fair
   d. Poor

5. The equipment was clean and in good working condition.
   a. Yes
   b. No

Please answer the following questions about your skill mastery.
1. The course prepared me to successfully pass the skills session.
   a. Yes
   b. No

2. I am confident I can use the skills the course taught me.
   a. Yes
   b. No
   c. Not sure

3. I will respond in an emergency because of the skills I learned in this course.
   a. Yes
   b. No
   c. Not sure

4. I took this course to obtain professional education credit or continuing education credit.
   a. Yes
   b. No

Optional questions:
Have you previously taken this course via another method, such as in a classroom or online?
Which learning method do you prefer and why?

Were there any strengths or weaknesses of the course that you would like to comment on?

What would you like to see in future courses developed by the AHA?

Upon completion:
Please email this form to

or mail to
American Heart Association
ECC Training Department
7272 Greenville Ave.
Dallas, TX 75231

Instructor or Training Center

KJ0920 HC 5/11 © 2011 American Heart Association

SBCC
09/16/2016
ECC Course Evaluation
for ACLS, BLS for Healthcare Provider and PALS Classroom Courses

Please answer the following questions about your Instructor.

My Instructor:
1. Provided instruction and help during my skills practice session
   a. Yes
   b. No

2. Answered all of my questions before my skills test
   a. Yes
   b. No

3. Was professional and courteous to the students
   a. Yes
   b. No

Please answer the following questions about the course content.

1. The course learning objectives were clear.
   a. Yes
   b. No

2. The overall level of difficulty of the course was
   a. Too hard
   b. Too easy
   c. Appropriate

3. The content was presented clearly.
   a. Yes
   b. No

4. The quality of videos and written materials was
   a. Excellent
   b. Good
   c. Fair
   d. Poor

5. The equipment was clean and in good working condition.
   a. Yes
   b. No

Please answer the following questions about your skill mastery.

1. The course prepared me to successfully pass the skills session.
   a. Yes
   b. No

2. I am confident I can use the skills the course taught me.
   a. Yes
   b. No
   c. Not sure

3. I will respond in an emergency because of the skills I learned in this course.
   a. Yes
   b. No
   c. Not sure

4. I took this course to obtain professional education credit or continuing education credit.
   a. Yes
   b. No

Optional questions:

Have you previously taken this course via another method, such as in a classroom or online? Which learning method do you prefer and why?

Did you learn more in the classroom because skills are demonstrated better in class?

Were there any strengths or weaknesses of the course that you would like to comment on?

What would you like to see in future courses developed by the AHA?

Upon completion:

Please email this form to

or mail to

Instructor or Training Center
American Heart Association
ECC Training Department
7272 Greenville Ave.
Dallas, TX 75231

SBCC
09/16/2016
STUDENT EVALUATION FORM

Course: [Course Name]
Instructor: [Instructor Name]
Program: [Program Name]
Date: [Date]

The following is a list of items relative to the instructor of this course. This survey should be anonymous; thus do not sign or identify you on this form. Comments will be summarized and the instructor will be furnished with a summary of all evaluations.

1. Was the instructor knowledgeable of the subject taught?
   - [D] Yes
   - [D] No
   If no explain:

2. Did the instructor explain the competencies required for successful completion of this course and how you will be graded?
   - [D] Yes
   - [D] No
   If no explain:

3. Was the subject matter presented in a logical and concise manner?
   - [D] Yes
   - [D] No
   If no explain:

4. Did this class start and end on time?
   - [D] Yes
   - [D] No
   If no explain:

5. Did the instructor display professionalism and a positive attitude toward students?
   - [D] Yes
   - [D] No
   If no explain:

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6. Is the instructor approachable and available for assistance outside of class?
   - Yes  
   - No
   
   If no explain: ________________________________

7. Was a detailed syllabus on the course provided to you on the first day of class?
   - Yes  
   - No
   
   If no explain: ________________________________

8. Were books received the first day of class?
   - Yes  
   - No
   
   If no explain: ________________________________

9. Were the results of your tests handed back in a timely manner?
   - Yes  
   - No
   
   If no explain: ________________________________

10. OVERALL EVALUATION OF TEACHER (Please rate your instructor on a scale between 1 and 5, with 5 being the best).
    
    5 Superior
    4
    3 Average
    2
    1 Inferior

   Comments:

11. OVERALL EVALUATION OF COURSE (Please rate your course on a scale between 1 and 5, with 5 being the best).
    
    5 Interesting & Helpful
    4
    3 Average
    2
    1 Boring

   Comments:
Priority Nursing College, 1050 Revolution Mill DR
Studio IA: 336 272-4952

STUDENT EVALUATION FORM

Course:                      Program: Medical Assistant
Instructor: Doug Wilson     Date: 10/7/15

The following is a list of items relative to the instructor of this course. This survey should be anonymous; thus do not sign or identify you on this form. Comments will be summarized and the instructor will be furnished with a summary of all evaluations.

1. Was the instructor knowledgeable of the subject taught?
   D Yes  D No
   If no explain: ________________________________________________

2. Did the instructor explain the competencies required for successful completion of this course and how you will be graded?
   D Yes  D No
   If no explain: ________________________________________________

3. Was the subject matter presented in a logical and concise manner?
   D Yes  D No
   If no explain: ________________________________________________

4. Did this class start and end on time?
   D Yes  D No
   If no explain: ________________________________________________

5. Did the instructor display professionalism and a positive attitude toward students?
   D Yes  D No
   If no explain: ________________________________________________
6. Is the instructor approachable and available for assistance outside of class?
   - D Yes
   - O No

   If no explain: ________________________________

7. Was a detailed syllabus on the course provided to you on the first day of class?
   - D Yes
   - O No

   If no explain: ________________________________

8. Were books received the first day of class?
   - D Yes
   - O No

   If no explain: ________________________________

9. Were the results of your tests handed back in a timely manner?
   - D Yes
   - O No

   If no explain: ________________________________

10. OVERALL EVALUATION OF TEACHER (Please rate your instructor on a scale between 1 and 5, with 5 being the best).
    - 5 Superior
    - 4 Average
    - 3 Inferior

   Comments: ________________________________

11. OVERALL EVALUATION OF COURSE (Please rate your course on a scale between 1 and 5, with 5 being the best).
    - 5 Interesting & Helpful
    - 4 Boring
    - 3 Average

   Comments: ________________________________
Priority Nursing College, 1050 Revolution Mill DR
Studio 1A: 336 272-4952

STUDENT EVALUATION FORM

Course: [Course Name]
Instructor: [Instructor Name]
Program: [Program Name]
Date: [Date]

The following is a list of items relative to the instructor of this course. This survey should be anonymous; thus do not sign or identify you on this form. Comments will be summarized and the instructor will be furnished with a summary of all evaluations.

1. Was the instructor knowledgeable of the subject taught?
   - [ ] D Yes
   - [ ] D No
   If no explain: ____________________________________________________________

2. Did the instructor explain the competencies required for successful completion of this course and how you will be graded?
   - [ ] D Yes
   - [ ] D No
   If no explain: ____________________________________________________________

3. Was the subject matter presented in a logical and concise manner?
   - [ ] D Yes
   - [ ] D No
   If no explain: ____________________________________________________________

4. Did this class start and end on time?
   - [ ] D Yes
   - [ ] D No
   If no explain: ____________________________________________________________

5. Did the instructor display professionalism and a positive attitude toward students?
   - [ ] D Yes
   - [ ] D No
   If no explain: ____________________________________________________________

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6. Is the instructor approachable and available for assistance outside of class?
   - D Yes
   - O No
   If no explain: ________________________________________________________________

7. Was a detailed syllabus on the course provided to you on the first day of class?
   - D Yes
   - O No
   If no explain: ________________________________________________________________

8. Were books received the first day of class?
   - D Yes
   - O No
   if no explain: ________________________________________________________________

9. Were the results of your tests handed back in a timely manner?
   - D Yes
   - O No
   if no explain: ________________________________________________________________

10. OVERALL EVALUATION OF TEACHER (Please rate your instructor on a scale between 1 and 5, with 5 being the best).
    5 Superior
    4
    3 Average
    2
    1 Inferior
    Comments: ___________________________

11. OVERALL EVALUATION OF COURSE (Please rate your course on a scale between 1 and 5, with 5 being the best).
    5 Interesting & Helpful
    4
    3 Average
    2
    1 Boring
    Comments: __________________________

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Priority Nursing College, 1050 Revolution Mill DR
Studio 1A: 336 272-4952

STUDENT EVALUATION FORM

Course: ___________________________ Program: CMA
Instructor: Doug Wilson Smith

Date: 3/2/16

The following is a list of items relative to the instructor of this course. This survey should be anonymous; thus do not sign or identify you on this form. Comments will be summarized and the instructor will be furnished with a summary of all evaluations.

1. Was the instructor knowledgeable of the subject taught?
   - D Yes   D No
   If no explain: ________________________________

2. Did the instructor explain the competencies required for successful completion of this course and how you will be graded?
   - D Yes   D No
   If no explain: ________________________________

3. Was the subject matter presented in a logical and concise manner?
   - D Yes   D No
   If no explain: ________________________________

4. Did this class start and end on time?
   - D Yes   D No
   If no explain: ________________________________

5. Did the instructor display professionalism and a positive attitude toward students?
   - D Yes   D No
   If no explain: ________________________________

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6. Is the instructor approachable and available for assistance outside of class?
   - Y: Yes  O: No
   If no explain: ____________________________________________________________

7. Was a detailed syllabus on the course provided to you on the first day of class?
   - Y: Yes  O: No
   If no explain: ____________________________________________________________

8. Were books received the first day of class?
   - Y: Yes  O: No
   If no explain: ____________________________________________________________

9. Were the results of your tests handed back in a timely manner?
   - Y: Yes  O: No
   If no explain: ____________________________________________________________

10. OVERALL EVALUATION OF TEACHER (Please rate your instructor on a scale between 1 and 5, with 5 being the best).
    - 5: Superior  4: Average  3:  2:  1: Inferior
    Comments: ____________________________________________________________

11. OVERALL EVALUATION OF COURSE (Please rate your course on a scale between 1 and 5, with 5 being the best).
    - 5: Interesting & Helpful  4:  3:  2:  1: Average  Boring
    Comments: ____________________________________________________________
Attachment 8:

July 19, 2016 letter and withdrawal form from Wilson to student.
July 19, 2016

Request for payment:

Tuition for the Spring Term amount due: $1,686.24

The $1,200 in-house scholarship is no longer a part of your tuition due to the school withdrawing you from the program. (Please read the Scholarship application rules) Your last day of the term was June 16th ending in the Keyboarding/Computer Concepts/Career Development course. Since you did not withdraw from the program (An email and letter via postal service was sent on June 3rd regarding your excess absences and withdrawal procedures) PNC kept you enrolled until July 18 according to school policy. With the spring term ending on June 16, you are responsible for the full payment of $1,686.24 for the term. Because PNC continued your enrollment from July 11-July 14, your summer tuition balance is $234.20. Your total balance is $1,920.44

Please pay promptly.

Douglas Wilson
Director
Official School Withdrawal Form

Name: __________________________ SSN: __________________________

Address: __________________________ Street __________________________ City __________________________ State/Zip Code __________________________

Date of Birth: __________________________ Age: __________________________

Telephone: __________________________

Last course completed: Pharmacology

Course withdrawing from: MED Office

Business Proc I

School Address: 1050 Revolution Mill Dr, Greensboro NC 27405

Street __________________________ City __________________________ State/Zip Code __________________________

Last Date of School Attendance: May 24, 2016

Date of Referral: __________________________

Reason for Withdrawal:

School has withdrawn student due to excess absences. Student was sent an email and letter via postal service.

On June 3, 2016 regarding excess absences and advised to read the policy regarding absences and withdrawal procedures in the enrollment agreement.

Signature of Superintendent/Designee __________________________ Date July 18, 2016
Priority Nursing College

1050 Revolution Mill Dr
Greensboro, NC 27405
Phone 336 272-4952
Fax: 336 338-7300
Email: sales@prioritynursingcollege.com
Web: www.prioritynursingcollege.com

July 7, 2016

Scott Corl, Office of Proprietary Schools
North Carolina Community College System
5001 Mall Service Center
Raleigh, NC 27699-5001

Priority Nursing College Response to Amended Documentation of Noncompliance and Notice of Investigation:

115D-93
Priority Nursing College only has one active program: Medical Assisting. The other two programs that we have; Phlebotomy and Nurse Aide II have been inactive prior to leaving the school June 2015 and are currently inactive. The last phlebotomy class taught was December 2013 and there have been no Nurse Aide II programs taught in the history of the school. I am the program supervisor and lead instructor for the MA program.

Priority Nursing sent in its renewal package before the stated deadline with additional revisions submitted at a later date with the audited financial statement submitted last, on June 22, 2016, via email to complete the renewal package to be licensed for the upcoming 2016-2017 fiscal year. Our renewal was approved.

We were institutionally accredited by Accrediting Bureau of Healthcare Schools August 2015. The MA program is the only program that the school can offer under our approved institutional accreditation.

I have been a registered nurse for 21 years and have worked in many different environments to include ambulatory and non-ambulatory settings. I have served as staff, as well as in supervisory positions. I have been teaching in a non-formal environment since becoming a registered nurse in 1995. I started teaching formally at Guilford Technical Community College in 2002 and have been teaching theory and fundamentals of healthcare every since.

I believe in a hands on approach and our students get plenty of laboratory experience in the classroom as well as theory. (See example of skills check off sheets, quizzes, tests, homework, class work assignments)
Ms. has been a fill in instructor for the school, we periodically email her when we request for relief staffing. (See emails). When did do relief staffing, she was given a lesson plan for the students to follow and a course syllabi. All students receive course syllabi prior to the beginning of any new course (See attached syllabi for each course). At present because there was only one program being taught with 7 students in the program, myself and Ms. as adjunct instructor could easily handle the program with 7 students. As lead instructor and only one program currently ongoing, Monday-Thursday 8am-1pm, I was the only needed full-time instructor. Ms. was never instructed or asked to teach a full class. Ms. was hired as a fill in instructor. I have taught much larger classes in the past. If an emergency arose where I would have to be out and Ms. was not available, I could always cancel and reschedule the class. Priority Nursing College will eventually hire additional instructors when enrollment is up.

I teach my students what they need to know in order to work in the real world once they complete the program. A course syllabus is provided with every course (See all syllabi attached that is given at the beginning of every class also see syllabi mentioned in email to ).

I have been teaching medical assistant since 2011 as an approved medical assistant instructor with no complaints from students. (Please see student surveys, extern affiliate surveys, student graduate surveys and employer surveys. Also see emails from and ). Before this incident brought a Christmas card and chocolate covered pretzels to me & wished me and my son happy holidays and stated how much she was enjoying the program. Please see testimonials in the school catalog as well as list of students who enjoyed the program.

Priority Nursing College has a board of highly qualified individuals who are current in the field. We meet once a year to discuss trends and the board offers the school recommendations to make the curriculum/program better. This is a great help to PNC in keeping it informed of new trends and material so that PNC can relay the information to its students to have the best informed and prepared students for employment.

Even though I have been teaching medical assisting since 2011 as the sole instructor of the Medical Assistant program ( joined us in September 2013) I review the material daily prior to teaching the class so that I am mentally prepared to teach. This involves reading over the material myself and anticipating any questions from the class, preparing lesson plans, tests, quizzes, class work, checkoffs and homework for the next day. Prior to each test a study guide is given to better prepare the student for the test in addition to a review of the chapter being tested. (See study guide and review)

I am always in class unless I'm getting student grades together or providing one on one student progress sessions or doing something else regarding student instruction/preparation. In the event I am away from class, the students are given assignments to work on in class.
I have been teaching since 2002 and am not here to be a favorite teacher but a teacher who gets the needed information to the students that they need to know in order to work as medical assistants. My method may be stern yet is effective as evidenced by the praise from externship sites and employers. (See surveys of clinical externship affiliate, employer surveys, graduate surveys and student surveys)

The school has been licensed by the NCCS since 2004 and is accredited by Accrediting Bureau of Health Education Schools and the policies/procedures/syllabi/instructors have been found competent and approved by NCCS and the Accrediting Bureau of Health Education Schools and awarded Accreditation by ABHES for the medical assistant program. I have also been found competent and have been approved by the North Carolina Community College System consecutively for over 10 years to be competent to teach as evidenced by continued renewal of our school license. I have included a list of students that have previously taken my classes. (See list of students who enjoyed class and contact #). If needed I can provide more as many students have taken my classes and comeback for more classes including [redacted] and [redacted] complete Med Aide and then Medical Assistant; [redacted] completed Nurse Aide and then Medical Assistant).

Priority Nursing College has provided all the documentation requested of NC Works and OPS to ensure that all funding was applied to each student funded as intended as well as progress/attendance records and financial documents. I have scanned the documents taken on 6/6/2016 by OPS and reviewed by Office of Proprietary Schools. (See attachments reviewed by OPS of each student file taken, [redacted]. See progress/attendance/financial documents).

I have taught over a thousand students and no complaints. (I included an attachment of some of the students that probably have enjoyed my teaching, most of these students are the first ones in our alphabetical listing, if I need to supply more, I will be happy to)

See attached surveys from [redacted] and [redacted] prior to the allegations.

There was only one class at the time of the alleged incident on May 25. The class had seven students. I am more than capable of instructing 7 students. At this time, it is not necessary to have additional instructors. [redacted] can be contacted if needed. If there is an emergency at the school, class can be rescheduled for another day. As mentioned earlier Priority Nursing College will eventually hire additional instructors when enrollment is up.

115D-93(c) (9)

Priority Nursing College only has one active program: Medical Assisting. I am the Program Supervisor and lead instructor for the MA program; approved through the NC Community College System and the Accrediting Bureau of Health Education Schools through 2019. [redacted] is the Adjunct Instructor. [redacted] is our clerical assistant. Priority Nursing College has been teaching healthcare programs since 2004 and never received a complaint regarding standards of instruction or qualifications of its staff.
2A SBCCC 400.11

The student attendance records are placed in the student files as the student complete courses. Mr. Corl was shown the student roster that is checked each day the student attends class on 6/27/2016. (This is a requirement of our accrediting agency as well). Every student record that was taken and reviewed by Mr. Corl contained progress notes/financial docs and past attendance records. No refunds were issued. (Amounts paid and due). The charts taken did not contain current attendance records as I have used them to continually take the attendance through June 23, 2016. (See attachment: Attendance kept by instructor) (See attachment, •••••••••••••••••••••••

Note: Upon receiving the files back from Mr. Corl, I could not locate the progress note for or and am including those. Both students received their evaluation for pharmacology. The progress note for the 3rd student, was available.

The amount of money owed by the student is documented in the records taken and reviewed by Mr. Corl. (See Attachments) See enclosed records recorded electronically.

Please find enclosed course curriculum given to each student at the beginning of the program. (Curriculum)
See list of supporting documents:

1. 7 Requested student account ledgers
2. Syllabi given at the beginning of each course
3. Electronic progress notes/grades
4. Scanned progress notes from student files
5. Curriculum given to [redacted]
6. Curriculum given to [redacted]
7. Curriculum given to [redacted]
8. Curriculum given to [redacted]
9. Attendance kept by instructor
10. List of students who enjoyed the class
11. Student Surveys, Employer surveys, clinical extern affiliate surveys,
12. [redacted] Externship progress notes (example)
13. MA program courses
14. Standards of Progress
15. NCCS approval of one program: Inactive programs-Phlebotomy/Nurse Aide II
16. Grievance policy
17. Advisory board/MA program
18. [redacted] Example of student chart, study assist
19. Emails regarding syllabi/course outline/lesson plans to [redacted]
20. Emails to [redacted]: Externship Manager regarding student progress
21. Clinical externship affiliate survey
22. Email to prepare the students for upcoming Medical Office Clinical Procedure course
23. Email to student who missed class to follow-up on missed class and homework assignment
24. Email response to student passing the national exam
25. Email response from student after being informed of my medical emergency
26. Testimonials from past students
27. Emails sent to Mr. Corl regarding requested documents and clarification of requested documents.

Douglas Wilson
Priority Nursing College
Director

SBCC
09/16/2016