

**RESTRICTED DELIVERY CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Before the Iowa Department of Public Health

<p>IN THE MATTER OF:</p> <p>Christina M. Brown 3412 Davis Avenue Sioux City, IA 51106-2261</p> <p>Certification #: PM-05-1604-08</p>	<p>Case Number: 17-12-06</p> <p style="text-align: center;">NOTICE OF PROPOSED ACTION</p> <p style="text-align: center;">SUSPENSION/PROBATION</p>
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Pursuant to the provisions of Iowa Code Sections 17A.18, 147A.7, and Iowa Administrative Code (I.A.C.) 641—131.7, the Iowa Department of Public Health is proposing to **SUSPEND** your EMS certification until the listed terms and conditions in this proposed action are met and then place your certification on **PROBATION** for a period of two years following successful completion of the terms and conditions.

The department may suspend or place on probation an EMS certification when it finds that the applicant or certificate holder has committed any of the following acts or offenses:

131.7(3) The department may deny an application for issuance or renewal of an emergency medical care provider certificate, including endorsement, or may impose any of the disciplinary sanctions provided in subrule 131.7(2) when it finds the applicant or certificate holder has committed any of the following acts or offenses:

a. Negligence in performing emergency medical care. IAC 641-131.7(3)a.

b. Failure to follow the directions of supervising physicians or their designee. IAC 641-131.7(3)b.

c. Rendering treatment not authorized under Iowa Code chapter 147A. IAC 641-131.7(3)c.

e. Professional incompetency. Professional incompetency includes, but is not limited to:

(1) a substantial lack of knowledge or ability to discharge professional obligation within the scope of practice. IAC 641-131.7(3)e(1).

(2) a substantial deviation from the standards of learning or skill ordinarily possessed and applied by other emergency medical care providers in the state of Iowa acting in the same or similar circumstances. IAC 641-131.7(3)e(2).

f. Knowingly making misleading, deceptive, untrue or fraudulent representations in the practice of the profession or engaging in unethical conduct or practice harmful or detrimental to the public. Proof of actual injury need not be established. IAC 641-131.7(3)f.

s. Willful or repeated violations of Iowa Code chapter 147A or these rules. IAC 641-131.7(3)s

The following incident resulted in issuance of this proposed action:

In October of 2017 you administered 1 ml of epinephrine intravenously to a patient when the 2017 Iowa Adult and Pediatric Statewide EMS Treatment Protocols for Asthma and COPD require the administration of epinephrine intramuscular. Additionally, you administered 1 ml of Solu-Medrol intravenously. You received no documented online or offline medical direction to deviate from the established protocol.

In October of 2017 you administered two separate 6 mg doses of Adenosine to a patient with a heart rate of 122. The 2017 Iowa Adult and Pediatric Statewide EMS Treatment Protocols for Cardiac Arrhythmias allows the administration of Adenosine in a patient with Symptomatic-Rates greater than 150. You received no documented online or offline medical direction to deviate from the established protocol.

In November of 2017 you administered three separate doses of Fentanyl (100 mcg + 50 mcg + 50 mcg) for a total of 200 mcg of Fentanyl. The 2017 Iowa Adult and Pediatric Statewide EMS Treatment Protocols for Pain Control allows the administration of Fentanyl to a maximum of 100 mcg. You received no documented online or offline medical direction to deviate from the established protocol.

You have previously been the subject of disciplinary action sanctioned by the Department. You received a letter of warning on January 20, 2010, a suspension on May 6, 2013 and a citation and warning on July 3, 2013.

Your Suspension shall be subject to the following terms and conditions. Once the following requirements are successfully completed, you may apply with the Bureau of Emergency and Trauma Services for rescission of the suspension of your certification:

- a. You shall successfully complete a paramedic refresher course at an Iowa authorized EMS training Program. This course shall be in addition to those required for renewal of your certification. You are responsible for all costs associated with this requirement.
- b. You shall successfully complete the National Registry cognitive exam for paramedics. This course shall be in addition to those required for renewal of your certification. You are responsible for all costs associated with this requirement.
- c. You shall successfully complete the National Registry practical exam for paramedics. This course shall be in addition to those required for renewal of your certification. You are responsible for all costs associated with this requirement.

If you successfully complete the above terms, you may apply for reinstatement of your certification. Following Department approval your certification will be under probation and shall be subject to the following terms and conditions:

- a. You shall submit quarterly reports to the Department (filed no later than January 10, April 10, July 10, and October 10) which shall include the following information:
 - i. The time period covered by the report
 - ii. Verification that you have complied with the terms of probation as specified in this Notice.
- b. You shall make a personal appearance before the Department upon request. You shall be given reasonable notice of the date, time, and place of appearance.
- c. You shall obey all federal, state, and local statutes and rules governing the provisions of emergency medical services.

- d. You shall notify any current or prospective employer, to include direct supervisors, service directors and medical directors, of the terms, conditions and restrictions imposed by this notice. Within fifteen days of this notice taking effect, or of undertaking new employment, your direct supervisor, service director and medical director shall report to the Department, in writing, acknowledging that the employer and medical director have read this document and understands it.
- e. You shall notify any EMS training program you enroll in for courses leading to certification or endorsement of the reasons for this probation. Within fifteen days of this notice taking effect, or entering an EMS training program, the training program director and medical director shall report to the bureau, in writing, acknowledging that the training program and medical director have read this document and understands it.
- f. You shall notify the bureau of any change in address within one week of said change.
- g. In the event you violate or fail to comply with any of the terms or provisions of your probation, the department may initiate appropriate action to revoke or suspend your certification or to impose other appropriate discipline.
- h. This Notice shall be part of the permanent record of the Department and shall be considered by the bureau in determining the nature and severity of any disciplinary action to be imposed in the event of future violations.

You have the right to request a hearing concerning this notice of disciplinary action. A request for a hearing must be submitted in writing to the Department by certified mail, return receipt requested, within twenty (20) days of receipt of this Notice of Proposed Action. The written request must be submitted to the Iowa Department of Public Health, Bureau of Emergency and Trauma Services, Lucas State Office Building, 321 East 12th Street, Des Moines, Iowa 50319. If the request is made within the twenty (20) day time limit, the proposed action is suspended pending the outcome of the hearing. Prior to, or at the hearing, the Department may rescind the notice upon satisfaction that the reason for the action has been or will be removed.

If no request for a hearing is received within the twenty (20) day time period, the disciplinary action proposed herein shall become effective and shall be final agency action.



Rebecca Curtiss, Bureau Chief
Iowa Department of Public Health
Bureau of Emergency

2/22/2018
Date