

NOTICE OF SUMMARY SUSPENSION AND PROPOSED REVOCATION

June 9, 2000

Mr. Eric Jason Dillon

Re: Notice of Summary Suspension and Proposed Revocation:
New Jersey Paramedic Certification #T-2366
Investigation Control #00-C-079

Dear Mr. Dillon:

The New Jersey Department of Health and Senior Services is vested with the responsibility of carrying out the provisions of N.J.S.A. 26:2K-7, et seq., which govern the provision of advanced life support services within the State of New Jersey. This law establishes a scheme that permits certain individuals, once certified, to perform advanced life support services. In furtherance of the objectives set forth in the statute, the Department of Health and Senior Services has adopted regulations which govern the training and certification of advanced life support personnel such as yourself. See, N.J.A.C. 8:41-1.1, et seq.

On June 8, 2000 staff of this Department's Office of Emergency Medical Services (GEMS) was made aware of a possible problem with your Paramedic certification as issued by The National Registry of Emergency Medical Technicians (NREMT). According to officials at Underwood Memorial Hospital (Underwood), you recently made application for employment as a Paramedic with that hospital. When asked for proof of certification, you presented Underwood officials with a NREMT card that reflected an expiration date of March 31, 2003. Knowing that NREMT cards are issued for two-year certification periods, Underwood staff became suspicious and contacted NREMT officials in Ohio, who confirmed that your NREMT Paramedic certification (#P0840472) expired effective March 31, 2000, and has not been renewed.

OEMS staff has subsequently contacted NREMT officials and has also confirmed that your NREMT Paramedic certification expired effective March 31, 2000. In addition, the NREMT card which you presented to Underwood officials lacks the words "NREMT 1970-1998" in the upper right hand corner, further confirming the fact that the NREMT card that you presented is fraudulent.

As the agency responsible for certifying Paramedics, it is this Department's obligation to ensure the health and safety of the public with whom you may come into contact. If there is any justifiable reason for this Department to believe that your continued certification as a Paramedic poses a threat to the public health and safety, it is our obligation to initiate proceedings for the immediate suspension of that certification. Specifically, N.J.A.C. 8:41-4.18(d), in relevant part, states:

"A pre-hospital ALS provider may be suspended by the Department during the course of an investigation of allegations, if the department demonstrates that public safety and health require such an interim suspension."

OEMS staff can come to no other conclusion but that the NREMT certification card that you presented to Underwood officials is, in fact, fraudulent. Your failure to maintain current certification with the NREMT is sufficient reason to warrant a summary suspension of your New Jersey Paramedic certification because, in accordance with N.J.A.C. 8:41-4.150), your New Jersey certification is granted solely on the basis of reciprocity with the NREMT certification. Therefore, please be advised that your New Jersey Paramedic certification is immediately suspended. In addition, please be advised that you may not, under any circumstances, act in the capacity of or perform the duties of a Paramedic with Underwood or any other Mobile Intensive Care program or provider in New Jersey during this period of suspension.

Pursuant to N.J.A.C. 8:41-2.8 and N.J.A.C. 8:41-4.18(d), you are entitled to appeal to the Commissioner of Health and Senior Services for an expedited hearing before the Office of Administrative Law to contest this summary suspension. If the summary suspension is upheld at the Office of Administrative Law, you have the right to apply for injunctive relief in the Superior Court of New Jersey.

Your appeal for an expedited hearing on this matter must be submitted in writing and must be accompanied by a response to the charges contained herein. Please include the control number noted above (i.e., #00-C-079) on your correspondence, and forward your request to:

New Jersey Department of Health & Senior Services
Office of Legal & Regulatory Affairs
P.O. Box 360, Room 805
Trenton, NJ 08625-0360
Attn: Mrs. Carole Slimm

Furthermore, pursuant to N.J.A.C. 8:41-4.18(a), the Department may suspend, revoke or refuse to issue or reissue the certification or cancel an endorsement of any prehospital ALS provider upon receipt of a complaint and subsequent investigation for the following:

2. Deceptive or fraudulent procurement of certification, recertification or endorsement credentials;
13. Failure to complete continuing education and performance standards as required by this chapter; and

18. Any other action deemed by the Department to pose a threat to public health and safety.

Therefore, in accordance with N.J.A.C. 8:41-4.18(a)2, 13 and 18, it is the intention of this Department to revoke your New Jersey Paramedic certification, thereby rendering you ineligible to practice as a Paramedic within the State of New Jersey. Pursuant to N.J.S.A. 26:2K-9, N.J.A.C. 8:41-2.8 and N.J.A.C. 8:41-4.18(e) you are entitled to a hearing before the Office of Administrative Law to contest this proposed revocation. Your request for a hearing on this matter must be submitted in writing within 30 days from the date of this Notice, and must be accompanied by a response to the charges contained herein.

Finally, please note that failure to submit a request for a hearing by July 8, 2000 shall result in the automatic revocation of your New Jersey Paramedic certification, effective 12:00 a.m. on July 9, 2000. If you have any questions concerning this matter, please do not hesitate to contact Mr. James Mondoro, Case Investigator, OEMS at (609) 633-7777.

Sincerely,
Gerard C. Muench, Jr., MPA, MICP
Director
Office of Emergency Medical Services

c: Mr. Wagoner, NREMT
Ms. Dubbs, PA Dept. of Health
Mrs. Slimm, L&RA
Ms. Barreto, DAG
Ms. Halupke, OEMS
Mr. Dinetz, OEMS
Mr. Mondoro, OEMS
Ms. Saunders, OEMS

CERTIFIED MAIL #
RETURN RECEIPT REQUESTED

NOTICE OF REVOCATION

July 10, 2000

Mr. Eric Jason Dillon

Re: Notice of Revocation of Paramedic Certification #T-2366
Investigation Control #00-C-079

Dear Mr. Dillon:

By Notice dated June 9, 2000 you were advised that this Department was proposing to revoke your certification to practice as a Paramedic within the State of New Jersey. A copy of that Notice is attached hereto.

You were also advised that if you planned to contest the proposed revocation, you were required to submit a written request for a hearing, and that failure to submit such a request by July 8, 2000 would result in the automatic revocation of your Paramedic certification, effective 12:00 a.m. on July 9, 2000.

Having not received such a request, please be advised that effective July 9, 2000, your certification to practice in New Jersey as a Paramedic was and is hereby revoked. Finally, please be advised that notice of this revocation will be sent to The National Registry of Emergency Medical Technicians.

If you have any questions, please contact Mr. James Mondoro, Supervisor of Advanced Life Support Services and Enforcement, Office of Emergency Medical Services at (609) 633-7777.

Sincerely,
Gerard C. Muench, Jr., MPA, MICP
Director
Office of Emergency Medical Services

c: NREMT
Mr. Mondoro, OEMS
Ms. Halupke, OEMS
Mr. Dinetz, OEMS
Ms. Saunders, OEMS

Enclosure
CERTIFIED MAIL #
RETURN RECEIPT REQUESTED