



State of New Jersey

DEPARTMENT OF HEALTH  
OFFICE OF EMERGENCY MEDICAL SERVICES  
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[www.nj.gov/health](http://www.nj.gov/health)

JUDITH M. PERSICILLI, RN, BSN, MA  
Commissioner

June 16, 2021

Thomas Eppler

**Re: Notice of Proposed Revocation of EMT-Instructor Certification  
Notice of Proposed Revocation of Onsite Learning Associates, LLC, Training  
Agency Authorization  
Investigation Control # 2020-0217V  
EMS ID # 501162**

Dear Mr. Eppler:

The New Jersey Department of Health (the Department) is vested with the responsibility of carrying out the provisions of N.J.S.A. 26:2H-1 et seq., Health Care Facilities Planning Act, which was enacted, in part, to assure that all hospital and related health care services rendered in the State of New Jersey are of the highest quality. As defined at N.J.S.A. 26:2H-2b, health care services include any pre-hospital care rendered by Basic Life Support (BLS) personnel. In addition, N.J.S.A. 26:2K-7 et seq., Emergency Medical Services Act, authorizes the Department to certify Emergency Medical Technicians (EMT). In furtherance of the objectives set forth in the statutes, the Department has adopted regulations that govern the training, certification, and professional conduct of EMTs, EMT-Instructors, EMT candidates, and EMT-Instructor Aides. (See: N.J.A.C. 8:40A-1.1 et seq.)

The Department's Office of Emergency Medical Services (OEMS) supports and ensures access to quality continuing education programs for Emergency Medical Services (EMS) professionals. Initial and ongoing education and training for EMTs is vital to protecting the health of our communities. In New Jersey, EMTs are required to obtain education in accordance with N.J.A.C. 8:40A to maintain and continually develop their professional skills and competencies.

On November 12, 2020, the OEMS received an anonymous complaint that you were conducting EMT Refresher classes, on behalf of Onsite Learning Associates, LLC, in a manner that violated N.J.A.C. 8:40A. The complaint specifically outlined the following:

1. On July 12, 2020, you conducted an EMT Refresher A class, at Vineland EMS, in which the students did not participate in psychomotor skills practice or evaluations and were dismissed from the class at approximately 12:35 p.m. This class was scheduled to end at 5:00 p.m.
2. On July 26, 2020, you conducted an EMT Refresher B class, at Vineland EMS, in which the students did not participate in psychomotor skills practice or evaluations and were dismissed from the class at approximately 1:15 p.m. This class was scheduled to end at 5:00 p.m.

3. On August 9, 2020, you conducted an EMT Refresher C class, at Vineland EMS, in which students did not participate in psychomotor skills practice or evaluation and were dismissed from the class at approximately 12:00 p.m. This class was scheduled to end at 5:00 p.m.; and
4. On August 26, 2020, you conducted an EMT Refresher B class, at the Atlantic County Fire Academy, in which students did not participate in psychomotor skills practice or evaluation and were dismissed from the class at 1:20 p.m. This class was scheduled to end at 5:00 p.m.

Consistent with its regulatory authority and OEMS policy, the OEMS opened an investigation into this matter. Upon opening the investigation, the OEMS investigators confirmed that you are currently certified as an EMT-Instructor. Specifically, you have been a certified EMT-Instructor since 2002. OEMS also confirmed that you are the owner and operator of OnSite Learning Associates, LLC, which is an OEMS authorized training agency, pursuant to N.J.A.C. 8:40A-3.1. Additionally, the OEMS confirmed that you logged into your Instructor Provider account at [www.njems.us/admbls](http://www.njems.us/admbls) and applied to conduct an:

1. EMT Refresher A class on July 12, 2020 from 8:00 a.m. until 5:00 p.m. at Vineland EMS. The class identification number assigned to you was 137733.
2. EMT Refresher B class on July 26, 2020 from 8:00 a.m. until 5:00 p.m. at Vineland EMS. The class identification number assigned to you was 137734.
3. EMT Refresher C class on August 9, 2020 from 8:00 a.m. until 5:00 p.m. at Vineland EMS. The class identification number assigned to you was 137791.
4. EMT Refresher B class on August 26, 2020 from 8:00 a.m. until 5:00 p.m. at the Atlantic County Fire Academy. The class identification number assigned to you was 137580.
5. EMT Refresher A class on November 8, 2020 from 8:00 a.m. until 5:00 p.m. at Vineland EMS. The class identification number assigned to you was 138254.
6. EMT Refresher B class on November 15, 2020 from 8:00 a.m. until 5:00 p.m. at Vineland EMS. The class identification number assigned to you was 138255.
7. EMT Refresher A class on November 27, 2020 from 8:00 a.m. until 5:00 p.m. at the Ventnor VFW. The class identification number assigned to you was 138246.
8. EMT Refresher B class on November 28, 2020 from 8:00 a.m. until 5:00 p.m. at the Ventnor VFW. The class identification number assigned to you was 138247.
9. EMT Refresher C class on November 29, 2020 from 8:00 a.m. until 5:00 p.m. at the Ventnor VFW. The class identification number assigned to you was 138248.

On November 15, 2020, OEMS investigators attempted to audit your EMT Refresher B class number 138255 scheduled from 8:00 a.m. until 5:00 p.m. at Vineland EMS. Prior to arriving at Vineland EMS, the OEMS investigators made note that at 9:42 a.m. you had already marked

nineteen of the twenty-five registered students as successfully completed in the [www.njems.us/admbls](http://www.njems.us/admbls) system.

At 11:33 a.m., after arriving at Vineland EMS, OEMS investigators conducted surveillance and noted that there were approximately fourteen vehicles parked in the parking lot adjacent to the Vineland EMS building. At 11:59 a.m., investigators witnessed multiple individuals exit the Vineland EMS building, enter their vehicles and leave. At 12:15 p.m., investigators witnessed the last vehicle leave the parking lot. According to your schedule, the class was supposed to break for a 30-minute lunch break from 11:45 a.m. to 12:15 p.m. Investigators continued to conduct surveillance from their vehicle, to allow time for students to return from lunch.

At 1:16 p.m., investigators were granted access into the Vineland EMS building by the on-duty EMS personnel. Upon entering the building, the Vineland EMS personnel confirmed that there was an EMT Refresher B class number 138255 being conducted at the building that day, but it had since concluded. The Vineland EMS personnel asked the OEMS investigators to wait in the classroom, until the Vineland EMS Supervisor (RS) returned. At 1:32 p.m., investigators were greeted by RS who also confirmed EMT Refresher B class number 138255 was held at the building and had since concluded.

On November 15, 2020 at 1:42 p.m., an OEMS investigator telephoned you and left a voicemail advising you that they were at Vineland EMS and requested a return telephone call. At 1:43 p.m., you logged into your Instructor Provider account at [www.njems.us/admbls](http://www.njems.us/admbls) and changed the class completion status for eighteen students, who were previously marked as "Successfully Completed", to "Incomplete". One student remained marked as "Successfully Completed". However, OEMS investigators received correspondences from students showing that they were provided successful completion certificates, issued by you, for this class.

Additionally, on November 15, 2020 at 1:46 p.m., you sent an email with subject line "PROBLEM", to all the registered students stating "DUE THE STATE SHOWING UP AND A HEALTH ISSUE WE WILL HAVE TO MAKE UP THE SECOND HALF OF THE CLASS, PLEASE CALL ME."

On November 15, 2020 at 3:07 p.m., an OEMS investigator emailed you to request copies of all documentation pertaining to EMT Refresher B class number 138255 be provided to the Department no later than close of business on November 16, 2020. The email specifically requested the following documentation:

1. Student registrations.
2. Copies of students' CPR cards.
3. Student sign-in sheets.
4. Student sign-out sheets.
5. Students' skills practice sheets.
6. Students' skills evaluation sheets.
7. Cognitive examinations.

8. Summative examinations.
9. Template.
10. Course syllabus.
11. Lesson plan.
12. Pre-scripted scenarios for practice and evaluation.
13. Examinations with answer keys.
14. Instructor and Instructor Aide sign-in sheet.
15. Instructor and Instructor Aide sign-out sheet.
16. Payroll logs for all instructors and instructor aides.
17. Students' class evaluations.

After no response, the investigator emailed you again at 8:07 p.m., to request all documentation pertaining to EMT Refresher B class number 138255 be provided to the Department no later than close of business on November 16, 2020. After failing to acknowledge or respond to the first two requests, an OEMS investigator emailed you a third time, at 8:19 p.m. on November 16, 2020 to request all documentation pertaining to EMT Refresher B class number 138255.

On November 15, 16, and 17, 2020, OEMS investigators interviewed thirteen (13) students via telephone. The telephone interviews revealed that you held an EMT Refresher B class, assigned class number 138255, on November 15, 2020. You dismissed the class before noon, without practicing or evaluating any psychomotor skills or evaluating the cognitive competency of each student individually. In fact, these interviews and documentation suggests you attempted to cover this up by encouraging the students to lie to the investigators.

On November 23, 2020, The IS Division for the City of Vineland provided OEMS investigators with security camera footage of the classroom at Vineland EMS, for which you conducted EMT Refresher C class number 137791 on August 9, 2020, EMT Refresher A class number 138254 on November 8, 2020, and EMT Refresher B class number 138255 on November 15, 2020. Although requested, security camera footage was not available for any classes held prior to August 9, 2020, at Vineland EMS. The security camera footage confirms that:

1. on August 9, 2020, EMT Refresher C class number 137791 started class at 8:10 a.m., students were given a break from 8:47 a.m. to 9:04 a.m., 9:40 a.m. to 9:51 a.m., 11:30 a.m. to 11:35 a.m. and were then dismissed at 11:58 a.m. Security footage shows the last person leaving the classroom at 12:03 p.m. and no additional movement in the classroom until 4:19 p.m., when someone shut the lights off to the classroom. There was no additional movement in the classroom that evening. This footage also verified that no

psychomotor skills practice or psychomotor evaluations were conducted, and you were the only instructor present.

- a. The EMT Refresher C class number 137791 application you submitted to the Department was scheduled to start at 8:00 a.m. and conclude at 5:00 p.m. According to your application your class schedule included:
  - i. Lecture from 8:00 a.m. to 9:30 a.m.
  - ii. Cognitive examination from 9:30 a.m. to 10:00 a.m.
  - iii. Psychomotor skills review from 10:00 a.m. to 10:30 a.m.
  - iv. a 15-minute break from 10:30 a.m. to 10:45 a.m.
  - v. Psychomotor skills practice from 10:45 a.m. to 12:05 p.m.
  - vi. a 45-minute lunch break from 12:05 p.m. to 12:50 p.m.
  - vii. Psychomotor skills practice from 12:50 p.m. to 2:10 p.m.
  - viii. a 15-minute break from 2:10 p.m. to 2:25 p.m.
  - ix. Psychomotor skills evaluation from 3:25 p.m. to 4:25 p.m.
  - x. Lecture and psychomotor skills from 4:25 p.m. to 5:00 p.m.
2. on November 8, 2020, EMT Refresher A class number 138254 started class at 8:00 a.m., students were given a break from 9:16 a.m. to 9:33 a.m., 11:27 a.m. to 12:37 p.m. and were then dismissed at 1:36 p.m. Security footage shows the last person leaving the classroom at 1:49 p.m. and no movement in the classroom from 1:49 p.m. until 2:16 p.m., when someone shut the lights off to the classroom. There was no additional movement in the classroom that evening. Footage also verified that no psychomotor skills practice or psychomotor evaluations were conducted, and you were the only instructor present.
  - a. The EMT Refresher A class number 138254 application you submitted to the Department was scheduled to start at 8:00 a.m. and conclude at 5:00 p.m. According to your application your class schedule included:
    - i. Lecture from 8:00 a.m. to 10:00 a.m.
    - ii. a 15-minute break from 10:00 a.m. to 10:15 a.m.
    - iii. Cognitive examination 1 from 10:15 a.m. to 10:45 a.m.
    - iv. Psychomotor skills review from 10:45 a.m. to 11:45 p.m.

- v. a 30-minute lunch break from 11:45 p.m. to 12:15 p.m.
  - vi. Psychomotor skills practice from 12:15 p.m. to 2:45 p.m.
  - vii. a 15-minute break from 2:45 p.m. to 3:00 p.m.
  - viii. Psychomotor skills evaluation from 3:00 p.m. to 4:30 p.m.
  - ix. Cognitive examination 2 from 4:30 p.m. to 5:00 p.m.
3. on November 15, 2020, EMT Refresher B class number 138255 started class at 8:06 a.m., students were given a break from 9:18 a.m. to 9:38 a.m. and were then dismissed at 11:56 a.m. Security footage shows the last person leaving the classroom at 12:09 p.m. and no movement until OEMS investigators appeared at 1:16 p.m. OEMS investigators left the classroom at 1:32 p.m. and there was no movement in the classroom until 3:38 p.m., when someone shut the lights off for the classroom. There was no additional movement in the classroom that evening. Footage also verified that no psychomotor skills practice or psychomotor evaluations were conducted. Additionally, footage revealed the EMT-Instructor Aide assisting you reviewed the cognitive examination with the entire class, instead of evaluating the students' cognitive knowledge individually.
- a. The EMT Refresher B class number 138255 application you submitted to the Department was scheduled to start at 8:00 a.m. and conclude at 5:00 p.m. According to your application your class schedule included:
    - i. Lecture from 8:00 a.m. to 10:00 a.m.
    - ii. a 15-minute break from 10:00 a.m. to 10:15 a.m.
    - iii. Cognitive examination 1 from 10:15 a.m. to 10:45 a.m.
    - iv. Psychomotor skills review from 10:45 a.m. to 11:45 p.m.
    - v. a 30-minute lunch break from 11:45 p.m. to 12:15 p.m.
    - vi. Psychomotor skills practice from 12:15 p.m. to 2:45 p.m.
    - vii. a 15-minute break from 2:45 p.m. to 3:00 p.m.
    - viii. Psychomotor skills evaluation from 3:00 p.m. to 4:30 p.m.
    - ix. Cognitive examination 2 from 4:30 p.m. to 5:00 p.m.

On November 24, 2020 at 1:09 p.m., an OEMS investigator received a telephone call from you, in which you stated that you were unable to provide the requested documentation for class

number 138255 due to personal reasons but you would speak with the Department in the near future about this issue. Additionally, you requested the Department cancel previously approved:

1. EMT Refresher A class number 138246, scheduled to be conducted at the Ventnor VFW on November 27, 2020 from 8:00 a.m. to 5:00 p.m.
2. EMT Refresher B class number 138247, scheduled to be conducted at the Ventnor VFW on November 28, 2020 from 8:00 a.m. to 5:00 p.m.
3. EMT Refresher C class number 138248, scheduled to be conducted at the Ventnor VFW on November 29, 2020 from 8:00 a.m. to 5:00 p.m.

On December 1, 2020 at 6:34 p.m., an OEMS investigator emailed you requesting the status of documentation for EMT Refresher B class number 138255. The investigator also requested all documentation pertaining to EMT Refresher C class number 137791 and EMT Refresher A class number 138254. The email specifically requested the following documentation:

1. Student registrations.
2. Copies of students' CPR cards.
3. Student sign-in sheets.
4. Student sign-out sheets.
5. Students' skills practice sheets.
6. Students' skills evaluation sheets.
7. Cognitive examinations.
8. Summative examinations.
9. Template.
10. Course syllabus.
11. Lesson plan.
12. Pre-scripted scenarios for practice and evaluation.
13. Examinations with answer keys.
14. Instructor and Instructor Aide sign-in sheet.
15. Instructor and Instructor Aide sign-out sheet.

16. Payroll logs for all instructors and instructor aides.

17. Students' class evaluations.

You finally provided OEMS investigators with the requested documents for Refresher C class number 137791 held on August 9, 2020, Refresher A class number 138254 held on November 8, 2020, and Refresher B class number 138255 held on November 15, 2020. You provided the Department with the following documents:

1. EMT Refresher C class number 137791 held on August 9, 2020.
  - a. A class sign-in sheet which included fourteen (14) student signatures and three (3) instructor signatures. The instructors listed were TE, JF, and JB. TE and JF are New Jersey certified EMT-Instructors.
  - b. EMT Refresher test answer sheet and skills verification check marks for all fourteen (14) students.
    - i. The skills verification check marks for students, MG and JW, included additional marks, not included on the forms for other students.
  - c. You did not include:
    - i. Student registrations.
    - ii. Copy of CPR certifications.
    - iii. Student sign-out sheet.
    - iv. Instructor/Instructor aide sign-out sheet.
    - v. Individual student skills practice or evaluation forms, completed, and signed by a New Jersey certified EMT-Instructor.
    - vi. A cognitive or summative examination with the answer key.
    - vii. Class template.
    - viii. Class syllabus.
    - ix. Class lesson plan.
    - x. Pre-scripted scenarios for practice and evaluation.
    - xi. Payroll records.
    - xii. Student evaluations.



2. EMT Refresher A class number 138254 held on November 8, 2020.
  - a. A student sign-in sheet which included eighteen (18) student signatures.
  - b. A student sign-out sheet which included eighteen (18) student signatures.
  - c. An instructor sign in sheet with three (3) instructor signatures. The instructors were TE, CM, and RS. TE and CM are New Jersey certified EMT-Instructors, RS is not.
  - d. EMT Refresher test answer sheet and skills verification check marks for all eighteen (18) students.
  - e. You did not include:
    - i. Student registrations.
    - ii. Copy of CPR certifications.
    - iii. Instructor/Instructor aide sign-out sheet.
    - iv. Individual student skills practice or evaluation forms, completed, and signed by a New Jersey certified EMT-Instructor.
    - v. A cognitive or summative examination with the answer key.
    - vi. A second examination answer sheet for each student.
    - vii. Class template.
    - viii. Class syllabus.
    - ix. Class lesson plan.
    - x. Pre-scripted scenarios for practice and evaluation.
    - xi. Payroll records.
    - xii. Student evaluations.
    - xiii. You did not include individual skills practice or evaluation forms, completed, and signed by a New Jersey certified EMT-Instructor.
3. EMT Refresher B class number 138255 held on November 15, 2020.
  - a. A student sign-in sheet which included nineteen (19) student signatures.

- b. A student sign-out sheet which included nineteen (19) student signatures.
- c. An instructor sign-in sheet which included three (3) instructor signatures. The instructors listed were TE, CC, and MG. TE was the only New Jersey certified EMT-Instructor and MG was a student in this class.
- d. EMT Refresher test answer sheet and skills verification check marks for all nineteen (19) students.
- e. You did not include
  - i. Student registrations.
  - ii. Copy of CPR certifications.
  - iii. Instructor/Instructor aide sign-out sheet.
  - iv. Individual student skills practice or evaluation forms, completed, and signed by a New Jersey certified EMT-Instructor.
  - v. A cognitive or summative examination with the answer key.
  - vi. A second examination answer sheet for each student.
  - vii. Class template.
  - viii. Class syllabus.
  - ix. Class lesson plan.
  - x. Pre-scripted scenarios for practice and evaluation.
  - xi. Payroll records.
  - xii. Student evaluations.

After reviewing the class documents, student records, and video surveillance the OEMS found no evidence of an individual cognitive evaluation, psychomotor skills practice, psychomotor skills evaluations, or verification of CPR certification for students registered in EMT refresher class numbers 137791, 138254, and 138255. Additionally, no evidence of additional EMT-Instructors or EMT-Instructor aides were identified in Refresher C class number 137791 or Refresher A class number 138254. Yet, the sign-in sheet identified additional instructors.

As you are aware, EMTs are required to obtain 24 core continuing education credits in order to maintain their certifications. See N.J.A.C. 8:40A-7.5. One way to obtain these credits is for an EMT to attend a Core 13 program, which is also known as Refresher Courses A, B, and C. N.J.A.C. 8:40A-9.5. Each course offers 8 continuing education credits and is 8 hours in length,

for a total of 24 hours of education and 24 credits. Ibid. As such, OEMS approved you to conduct EMT Refresher A class number 137733 offered on July 12, 2020 from 8:00 a.m. until 5:00 p.m. at Vineland EMS, EMT Refresher B class number 137734 offered on July 26, 2020 from 8:00 a.m. until 5:00 p.m. at Vineland EMS, EMT Refresher C class number 137791 offered on August 9, 2020 from 8:00 a.m. until 5:00 p.m. at Vineland EMS, EMT Refresher B class number 137580 offered on August 26, 2020 from 8:00 a.m. until 5:00 p.m. at the Atlantic County Fire Academy, EMT Refresher A class number 138255 offered on November 8, 2020 from 8:00 a.m. until 5:00 p.m. at Vineland EMS, and EMT Refresher B class number 138255 offered on November 15, 2020 from 8:00 a.m. until 5:00 p.m. at Vineland EMS, each was approved as an 8-hour course that afforded 8 core credit hours to each EMT student who successfully completed the course.

The investigation revealed that you are in violation of N.J.A.C. 8:40A-9.5 because EMT Refresher C class number 137791 offered on August 9, 2020, EMT Refresher A class number 138254 offered on November 8, 2020, and EMT Refresher B class number 138255 offered on November 15, 2020 did not provide 8 hours of instruction to the students in attendance. In fact, each course was only 3-4 hours in length at most. Yet, you provided the students who attended these courses with certificates of completion and approved them for 8 core continuing education credits, in violation of N.J.A.C. 8:40A-9.2. The investigation also revealed that you are in violation of N.J.A.C. 8:40A-9.1(a) because you failed to provide proof that all course attendees were in possession of an EMT and CPR certification.

Furthermore, you did not maintain the appropriate instructor to student ratios for EMT Refresher C class number 137791 offered on August 9, 2020, EMT Refresher A class number 138254 offered on November 8, 2020, and EMT Refresher B class number 138255 offered on November 15, 2020. Pursuant to N.J.A.C. 8:40A-9.3(b)(5), Core 13 programs (a.k.a. Refresher Courses A, B, and C) require "an EMT-Instructor to student ratio of 1:6, or a ratio of 1:10 if the EMT-Instructor is assisted by an EMT-Instructor Aide." There were:

1. fourteen (14) students in attendance for EMT Refresher C class number 137791 offered on August 9, 2020, which would have required, at a minimum, two instructors and one instructor aide for the class. You were the only New Jersey EMT-Instructor present.
2. eighteen (18) students in attendance for EMT Refresher A class number 138254 offered on November 8, 2020, which would have required, at a minimum, three instructors or two instructors and two instructor aides for the class. You were the only EMT-Instructor present.
3. nineteen (19) students in attendance for EMT Refresher B course number 138255 offered on November 15, 2020, which would have required, at a minimum, two instructors and two aides or three instructors and one aide for the course. During this class you were the only New Jersey EMT-Instructor present and were assisted by an EMT-Instructor Aide.

Moreover, for the above referenced courses, you failed to provide the students with psychomotor skills practice, psychomotor skills evaluations, and individual cognitive evaluations. As you should be aware, the Core 13 program (Refresher Courses A, B, and C) is the National Emergency Medical Services Scope of Practice, National Emergency Medical Services Education Standards and the National Emergency Medical Services Core Content (formerly

known as the EMT-Basic Refresher National Standard Curriculum) promulgated by the National Highway Traffic Safety Administration of the United States Department of Transportation. N.J.A.C. 8:40A-1.3. Pursuant to these standards, psychomotor skills, practices, and evaluations must be conducted for the students attending the refresher program<sup>1</sup>. Indeed, the psychomotor skills component of the refresher program reinforces old and new healthcare practices. However, the students who attended the above courses were not provided with psychomotor practice, psychomotor evaluation, or individual cognitive evaluations. Thus, the students who attended the above courses were not provided with the appropriate education and evaluation necessary to determine their level of understanding and competence in all skills and knowledge approved within the National Emergency Medical Services Scope of Practice, National Emergency Medical Services Education Standards and the National Emergency Medical Services Core Content and required by the Department's rules.

In addition to failing to provide the students with psychomotor skills practices, psychomotor skills evaluations, and individual cognitive evaluations, the investigation also revealed that you falsified your records by adding instructor signatures to the sign in sheet when these instructors were not present. Specifically, OEMS reviewed your documentation and found that you provided sign-in sheets containing instructor signatures that were falsified, in an attempt to portray appropriate instructor to student ratios and avoid having OEMS detect your lack of appropriate ratios.

Additionally, only after investigators arrived on site at the Vineland EMS Building on November 15, 2020 to audit EMT Refresher 138255 and attempted to contact you, did you change the completion status of the students from complete to incomplete and sent them an email. OEMS finds that you made efforts to avoid having OEMS detect the lack of psychomotor skills, improper instructor to student ratios, and early dismissal in an attempt to willfully obstruct the investigation.

Pursuant to N.J.A.C. 8:40A-10.2(b) "[t]he Commissioner, or his or her designee, may....suspend, revoke and/or refuse to issue or renew the certification of an EMT or EMT-Instructor for violation of any of the rules set forth in this chapter". This shall include, but is not limited to:

1. Demonstrated incompetence or inability to provide adequate services;
2. Deceptive or fraudulent procurement of certification or recertification credentials and/or documentation;
17. Willful obstruction of any investigation and/or representative of the Department or other agency empowered to enforce the provisions of this chapter or any applicable law, rule and/or regulation;
22. Failure to complete continuing education and performance standards as required by this chapter; and

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<sup>1</sup> [Ems.gov/education.html](http://Ems.gov/education.html)

25. Failure to comply with any part of his chapter, any applicable part of N.J.A.C. 8:40 or 8:41, or any applicable law, rule/or regulation.”

Pursuant to N.J.A.C. 8:40A-3.3(a), a training program’s authorization may be suspended or revoked for:

1. Failure to adhere to the rules. . . ;
2. Failure to strictly adhere to the U.S.D.O.T. EMT National Standards Curriculum. . . ;
3. Failure to maintain required personnel, facilities, resources, finances, records, equipment, and evaluation tools;
6. Refusal to allow Department staff to conduct a site review, inspection and/or evaluation or obstructing Department staff during the course of such site review, inspection and/or evaluation; and
7. Failure to successfully pass a site review, inspection or evaluation.

In order to be effective, EMTs and EMT-Instructors must exercise good judgement, trust each other and be trusted by police officers, fire fighters, doctors and other professionals. Additionally, EMTs are expected to execute many treatment modalities based on their assessments and protocols in challenging situations. They must be able to exercise considerable judgement, problem solving and decision-making skills. The complexity of care delivered by EMS personnel can range from the very basic skills to the exceptionally complex monitoring and interventions for high acuity patients. The competency of these skills must be reviewed, remediated (if necessary) and evaluated on a continuous basis to ensure no harm is brought to a patient. As such, refresher courses are vital for maintaining effective EMTs. By not completing the psychomotor practices and evaluations, failing to provide the required instructor to student ratios, providing less than a half day of instruction for full day refresher courses, and falsifying records you have placed the students and their patients at risk, acted in a negligent capacity as an EMT-Instructor, lack trustworthiness, and demonstrated poor judgement and blatant disregard for the Department’s rules.

Based upon the foregoing, the Department has determined that your EMT-Instructor certification and training program authorization must be **revoked**. The above actions demonstrate that you not only have poor judgement but lack trustworthiness. In short, your behaviors and actions are incompatible with the duties of an EMT-Instructor and EMS training program. **Therefore, as a result of this investigation, it is the intention of the Department to revoke your EMT-Instructor certification and training program authorization.**

Pursuant to N.J.A.C. 8:40A-10.3(b), you may request a hearing before the New Jersey Office of Administrative Law to contest this Department’s decision to revoke your EMT-Instructor certification and training program authorization. Your request for a hearing on this matter must be submitted in writing and must be accompanied by a response to the charges contained herein. **As for your EMT-Instructor certification, you are reminded that you remain under a summary suspension and, as a result, are PROHIBITED from acting in the capacity of an EMT-Instructor.** If you wish to request a hearing, please include control number **2020-0217V** on your correspondence, and forward your request to:

New Jersey Department of Health  
Office of Legal & Regulatory Compliance  
P.O. Box 360  
Trenton, NJ 08625-0360

**Failure to submit a written request for hearing within 30 days from the date of this notice shall be interpreted as an acceptance of this Department's decision to revoke your EMT-Instructor certification and training agency authorization, thereby negating any further appeal rights and converting this action into a final agency decision.** If you have any questions concerning this matter, please contact Ms. Candace Gardner, Chief, Clinical Education and Licensure, at (609) 633-7777 or via email at [Candace.Gardner@doh.nj.gov](mailto:Candace.Gardner@doh.nj.gov).

Sincerely,



Terry Clancy, PhD, RN, NRP  
Director  
Office of Emergency Medical Services

c: Candace Gardner, Chief, Clinical Education and Licensure  
Daniel Kazar, Investigator

SENT VIA REGULAR U.S. AND CERTIFIED MAIL #  
RETURN RECEIPT REQUESTED